

A&T BANK ANTI-BRIBERY AND CORRUPTION POLICY

1. PURPOSE

The purpose of Anti-Bribery and Corruption Policy (“Policy”) is to ensure compliance of Arap Türk Bankası A.Ş. (A&T Bank) with legal regulations and ethical and professional principles and rules that have been and will be issued in order to prevent bribery and corruption.

2. SCOPE

This Policy covers all Bank employees, including the Board of Directors, agencies, persons acting by proxy, suppliers, contractors, third parties, associated agencies and persons working together with them. This Policy is an integral part of Personnel Regulation and Disciplinary Regulation as well as A&T Bank’s Code of Conduct and Ethical Principles, which are implemented by the Board of Directors and do cover all employees.

3. IMPLEMENTATION

3.1 DEFINITIONS

Bribery is action of a person that is in contradictory with the requirements of his/her duty by doing, not doing, accelerating or slowing down a job and gaining benefit to himself/herself, his/her family, inner circle and/or third persons by reaching an agreement with a third person. The benefit that can be considered as a bribery can be in different forms, such as cash, instruments that can be liquidated easily, gifts, invitation or ticket for an event, debt forgiveness, donations for aiding purposes, etc.

Corruption is the request and offer for and giving or accepting a bribe or any other illegal benefit that causes deviations from legal performance of duties or required behaviors of a person that has directly or indirectly received bribe or an illegal benefit.

3.2 AUTHORITIES AND RESPONSIBILITIES

Board of Directors of the Bank is responsible to create, implement and ensure updating of this Policy. A disciplinary action is taken as a result of actions of the Bank’s employees in contradiction with these principles. Disciplinary Committee is authorized to evaluate such conditions.

The Bank’s employee reports to relevant authorities in accordance with the Bank’s “Whistleblowing Policy” in case he/she suspects or hesitates of any situation, including bribery and corruption. The reported case is examined by responsible unit by keeping the identity of reporting staff and content of the report confidential. If deemed necessary, a feedback is given to the reporting staff at the end of examination.

3.3 MAIN AREAS OF RISK FOR BRIBERY AND CORRUPTION ACTIONS

The Bank aims full compliance with relevant laws, regulations and principles and does not tolerate any action of bribery and corruption regardless of its goals and purpose.

The business relationship with third parties that request to receive service from the Bank through bribery is terminated.

Main areas of risk, at which the actions of bribery and corruption may occur, are defined below in details:

a. Gifts and Entertainment

Gift is a product that do not require any material payment and is usually given for thanking or as a commercial courtesy by customers or persons, with whom there is a business relationship.

Any gift given by the Bank to third persons is offered in good faith, openly and without any condition. Employees pay attention that any gift to be given to customers, suppliers and other persons in special days, such as festivals, new year, etc. are reasonable. Although same principles are valid also for accepting gifts, any non-practical gift that is given to the employee, his/her family, inner circle and/or third parties other than symbolic gifts that are given in compliance with this principle must never be accepted. Employees cannot receive cash or any gift that can be converted to cash from customers, suppliers or third parties. Employees cannot accept or request any gift, entertainment or other presents, which are being offered with the intention to influence the Bank's preferences and decisions.

Entertainment can be offered to customers, advisors, lawyers, auditors and other companies, with whom the Bank has a commercial relationship, in order to establish a commercial relationship network and improve existing commercial relationships. The Bank offers entertainment to third persons in good faith, openly and without any condition.

Even if they comply with the issues stated herein, any entertainment offer and gift that may lead to a conflict of interest or cause any situation that can be perceived like that is not offered or accepted.

The Bank's employees cannot request or accept gifts that are in contradiction with the Bank's Personnel Regulation and Disciplinary Regulation and A&T Bank's Code of Conduct and Ethical Principles as well as provisions of other legislations and cannot behave in a way to mean like that.

b. Donations

Principles on donations and aids are regulated in the Bank's Expenditure and Claim Regulation.

No political donation can be made on behalf of the Bank. The Bank cannot use its facilities and tools to support any political candidate or institution.

c. Outsourcing Companies and Partners

The Bank conducts a due diligence before evaluating the companies and partners, from which it will receive outsourcing services, including support services, and it does not work with persons and organizations, for which there is negative intelligence.

Outsourcing companies and partners are obliged to comply with the principles of this Policy and other applicable regulations. The Bank informs such companies and partners that they have to comply with the rules of this Policy.

Any business relationship with persons and organizations that do not comply with these principles and other regulations is terminated.

d. Facilitating Payments

The Bank does not allow the persons and organizations covered by this Policy to offer any facilitating payment in order to secure or accelerate a routine procedure or process of public authorities.

e. Abusing the Title or Malpracticing

The Bank's employees can never use their positions and authorities in favor of themselves, their family members or third persons in order to gain any personal and private benefit. The Bank's employees cannot provide or promise a benefit directly or by an intermediary or any other mean to themselves, their family members or third persons through mutual agreement, persuasion or forcing by malpracticing their positions or duties knowingly or intentionally.

3.4 POLICY VIOLATIONS AND SANCTIONS

This Policy can be accessed by all employees through the Bank's ECM system. Therefore all employees agree in advance to comply with the articles of this Policy, which is an integral part of their employment agreements, and the results of any contradicting action.

All employees of the Bank are obliged to comply with this Policy, applicable legal regulations and all anti-corruption laws that are currently in force.

If employees of the Bank act in contradiction with the rules provided in this Policy, disciplinary actions that may include termination of employment agreement can be applied based on the nature of the event. Furthermore, there might be criminal liabilities for those that do not comply with applicable legal regulations and anti-corruption laws that are currently in force.

It is not accepted to treat any employee badly since he/she refuses to participate in a bribery or corruption event, reports the breach of principles of this Policy under "Whistleblowing Policy", or expresses his/her concerns about corruption actions that may occur in future.