

A&T BANK WHISTLEBLOWING POLICY

1. PURPOSE

The purpose of this Policy is to encourage the employees and stakeholders of Arap Türk Bankası A.Ş. to report any situation that they suspect to be in contradiction with Code of Conduct and Ethical Principles of A&T Bank as well as applicable legislations, regulations, policies, and procedures. It is also aimed to state clearly that employees of Arap Türk Bankası A.Ş., who have reported in good faith, are protected from retaliation actions that might be taken against them.

2. SCOPE

All employees and managers of Arap Türk Bankası A.Ş. are obliged to comply with Personnel Regulation and Disciplinary Regulation as well as this policy, which is an integral part of A&T Bank's Code of Conduct and Ethical Principles.

3. IMPLEMENTATION

3.1 GENERAL PRINCIPLES

A&T Bank places great importance on current legislations and performs its operations honestly and in accordance with the highest ethical standards and supports “open communication” and “accountability” culture in order to prevent unethical or illegal actions.

Therefore A&T Bank expects any of its employees or partners, who has directly or indirectly witnessed any illegal action or unethical event, become aware of them through legal means or suspects of any such situation, to express their concerns and encourages its stakeholders to do so.

A&T Bank carefully evaluates all notices reported to it and aims to investigate the claims as written below. For this purpose, all examinations/investigations are performed as soon as possible after receiving the notice by also taking preliminary evaluation results into consideration.

3.2 AUTHORITIES AND RESPONSIBILITIES

Inspection Council, Compliance and Internal Control Department, , Human Resources Management and Organization Department / Compensation and Benefits Management Unit and Information Security Department shall hereinafter be referred as “**Responsible Units**” and Human Resources Management and Organization Department / Compensation and Benefits Management Unit is responsible to communicate, monitor, ensure the implementation and coordination of and report this Policy and ensure that improving actions are taken.

All employees of A&T Bank are responsible to comply with this Policy and implement relevant procedures and controls in accordance with the requirements of this Policy. Managers are responsible to monitor whether their employees comply with this Policy as well as Personnel Regulation, Disciplinary Regulation and A&T Bank's Code of Conduct and Ethical Principles or not and to train the staff for this purpose in case of necessity.

If there is any discrepancy between this Policy and local legislations, this Policy or legislations, whichever is more restrictive, shall prevail to the extent applicable practices do not contradict with the legislations.

Breach of this policy by an employee may cause significant disciplinary actions, including termination of employment.

3.3 WHISTLEBLOWING SUBJECTS

Any illegal or unethical behavior or action that has occurred in the past or is continuing at the time of whistleblowing or expected to occur in the future, including but not limited to those stated in the following topics, might be the subject of a whistleblowing. (Customer complaints for products and services are not covered by this policy unless they are also the subject of a whistleblowing.)

- a. Actions Against Employees:** A&T Bank provides a safe, peaceful and professional working environment for its employees. Therefore, any action in against of the employees of A&T Bank that may contradict with legislations, ethical principles or applicable policies and may jeopardize safe and peaceful condition of working environment is not tolerated.
- b. Actions Against A&T Bank:** All employees of A&T Bank comply with our basic values and ethical principles while performing their tasks and avoid from any behavior and action that may materially and/or spiritually damage A&T Bank. This is only possible if the values of A&T Bank are internalized and maintained by all employees. Therefore any action of employees of A&T Bank contradicting with our basic values, regardless of their seniority or title, is not tolerated.
- c. Breaches Caused by Partners:** A&T Bank monitors and evaluates the risks associated with Partners in order to ensure compliance with the issues stated in Personnel Regulation, Disciplinary Regulation, A&T Bank's Code of Conduct and Ethical Principles, particularly Anti-Bribery and Corruption Policy, and applicable policies. Any action of our partners in contradiction with our ethical values and applicable policies is not tolerated.
- d. Violations of Special Laws:** A&T Bank complies with the arrangements enacted by competent authorities of the government of the Republic of Turkey and, when these arrangements are not certain, it encourages its employees to receive information from the experts and expects them to always comply with applicable regulations and ethical principles. It is not tolerated to violate national or applicable international legislations, including but not

limited to those pertaining to sanction controls, anti-bribery and corruption, prevention of laundering of criminal proceeds and financing of terrorism, protection of competition and personal data and Capital Market legislations.

Each of above described issues form “Subject of Whistleblowing” and they shall collectively be referred as “Subjects of Whistleblowing”.

3.4 WHISTLEBLOWING METHODS

A&T Bank has developed below mentioned whistleblowing methods in order for submitting the subjects of whistleblowing that contradict with legislation and policies or are concerned.

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| Compliance Officer | uyumbildirim@atbank.com.tr |
| Head of Inspection Council | teftisbildirim@atbank.com.tr |
| Compliance and Internal Control Department Manager | ickontrolbildirim@atbank.com.tr |
| Information Security Officer | bilgiguvenligi@atbank.com.tr |
| Human Resources Management | etikbildirim@atbank.com.tr |

If an employee or manager directly becomes aware of a subject of whistleblowing and/or the subject of whistleblowing is notified to him/her by another person, he/she must immediately and confidentially report through the whistleblowing methods stated herein in order to ensure that the whistleblown issue is handled in accordance with this policy and all information are consolidated.

The whistleblown issue must include sufficient information and details to ensure that necessary examination or investigation is performed for the subject of whistleblowing. If the whistleblower has any interest regarding the report, this must be declared. (For example, a situation that will be beneficial for the whistleblower would or may occur as a result of the whistleblown issue.) Furthermore, any whistleblowing action of the persons that have whistleblown the issue in good faith despite of being involved to the issue might be considered as a favorable aspect.

If any intentional report that is a lie and/or slander is found or failing or ignoring any situation in contradiction with Personnel Regulation and Disciplinary Regulation as well as A&T Bank’s Code of Conduct and Ethical Principles, applicable legislations and other relevant policies despite of noticing them, this can be considered as a breach of rules and may cause disciplinary actions that may include termination of employment agreement.

3.5 FOLLOW-UP OF WHISTLEBLOWING

Responsible units and authorized persons working in those units are performing an independent task and whistleblown issues are examined by persons that do not cause any conflict of interest. They can periodically evaluate the data available in the system (e.g. type or frequency of events, departments that are regularly reported, etc.) and, if it is necessary, they can work together with other relevant departments and ensure that necessary actions are taken to remove identified compliance risks.

3.6 PRIVACY, ANONYMITY AND INTEGRITY

A&T Bank respects the preference of whistleblowers to stay anonymous. For this reason, any reported information is kept confidential to the extent allowed by applicable legislations and except for below cases:

- The whistleblower clearly consents to the disclosure of information;
- Identity of the whistleblower is required to be disclosed as per the arrangements in force (if the requested information is required for prosecutions initiated by judicial authorities or for legal processes);
- Disclosure of identities prevents or reduces significant threats against the health or safety of whistleblower.

Unjustified disclosure of the identity or identifiable information of the whistleblower in cases other than those listed above is considered as a breach of arrangements for protection of whistleblower and other persons involved in the event.

Although the whistleblower is preferred to provide his/her identity, if such report is made anonymously, it might be more difficult to examine/investigate and it might not be possible to protect the whistleblower in case it is needed to have more information about the subject of whistleblowing. Accordingly and to the extent allowed by applicable legislations, details of the whistleblowing and all other information obtained throughout an examination/investigation process are shared with the persons that are authorized (i) to examine/investigate, (ii) to evaluate the subject, and (iii) to act, provided that they are not identified in the subject of whistleblowing. For the avoidance of doubt, any person, whose name was mentioned in the report/notification, is not authorized to evaluate or access to or be involved in the examination/investigation process.

Examination/investigation must be confidential and the department that is carrying on the examination/investigation is not obliged to inform the whistleblower about the progress and result of examination/investigation.

All persons that have provided information during examination/investigation are obliged to keep both the information they have provided and learned confidential and to protect and

respect to the existence and confidentiality of examination/investigation and the persons involved in the process.

A whistleblower has the following options when reporting an event:

- a. To not to share his/her name and contact details to stay anonymous;
- b. To share his/her name and contact details and allow such information to be shared only with authorized persons. In this case, the whistleblower might be contacted directly to request any information needed during an examination/investigation.

3.7 PROTECTION OF WHISTLEBLOWER

A&T Bank encourages and supports the reporting of concerns. Attention is paid to ensure that a whistleblowing employee feels himself/herself comfortable and safe and does not worry that his/her professional life would be affected adversely as long as he/she acts honestly and in good faith.

Therefore, employment agreement of the whistleblower cannot be terminated due to the whistleblown issue, he/she cannot be suspended or dismissed, he/she cannot be forced to use paid or unpaid leave against his/her will, his/her place of duty cannot be changed and any similar action to penalize the whistleblower cannot be taken after conducting necessary examinations about the whistleblown issue (provided that the measures required to be taken under Disciplinary Regulation are reserved).

A&T Bank never tolerates any retaliation against a whistleblower. Retaliations are accepted as a clear breach of this policy and they are handled under Disciplinary Regulation.

A&T Bank protects the whistleblowers even if the accuracy of event could not be proven by an examination/investigation, provided that the notification is made in good faith and due to reasonable reasons and not for causing an unjust treatment, damaging or gaining personal benefits. However, if it is found as a result of an examination/investigation that the whistleblower has reported wrong information intentionally and in bad faith, this employee might be subject to a disciplinary process and disciplinary actions. Therefore, it is highly important that whistleblown issues are based on observations and, if possible, can be proven.

3.8 EXAMINATION AND INVESTIGATION

All notices received through whistleblowing methods are evaluated by Responsible Units (Inspection Council, Compliance and Internal Control Department, , Human Resources Management and Organization Department / Compensation and Benefits Management Unit and Information Security Department) based on their subjects.

If the subject of a submitted notification is a highly risky issue that may materially and morally damage A&T Bank or regarding an employee that holds a Manager and higher position, if

necessary, it is shared with senior management (General Manager and relevant Assistant General Manager) by the authorized persons of responsible units that have evaluated the whistleblown issue in order to be evaluated confidentially regardless of anonymity of the whistleblown issue.

Authorized persons working in the responsible unit and senior management determine the initial actions to be taken. If deemed necessary, Disciplinary Committee and other relevant persons are informed. Authorized persons working in the responsible units may take necessary actions in order to prevent similar breaches in future.

If there are information obtained by a whistleblower through illegal means are not taken into consideration during the examination/investigation. All whistleblown issues are evaluated by taking them into consideration carefully and the whistleblower might be informed that the issue is being evaluated by responsible units and authorized persons.

Examinations/investigations are conducted by the departments and persons that have necessary qualification. All appropriate actions are taken to ensure that examination/investigation process is fair and unbiased. Actions, including but not limited to receiving the explanations of evaluated persons for the claims against them and offering them an opportunity to defend themselves are the relevant steps.

If there is any hierarchical or functional conflict of interest or the Inspection Council, Compliance and Internal Control Department or and names of persons working in these departments are included to the reported event in a way to effect objectivity and independent decision making in examinations/investigations, such examination/investigation is carried on through a method to be determined by Audit Committee.

Whistleblown issues are evaluated by the responsible units independently and by using their own internal approaches and processes, based on the content. An examination/investigation report is prepared at the end of evaluation by the unit responsible for whistleblowing. This report is processed to ensure that necessary actions are taken by the management that is responsible for each unit. It is ensured that the notification is concluded as soon as possible by taking the confidentiality of whistleblower and the persons affected from whistleblowing into consideration. If necessary, responsible units may inform and take the opinions of other relevant department(s) during the examination/investigation. In this case the consulted departments share their recommendations as soon as possible and, in any case, in a way so as not to cause any delay in the process.

If it is deemed necessary by taking the condition and effectiveness of examination / investigation into consideration, the whistleblown employees may temporarily be suspended or dismissed. It may also be requested from responsible units to change the place of duty of whistleblower by presenting justified reasons.

The report that is prepared as a result of examination/investigation is submitted to relevant senior levels of A&T Bank. If issues contradicting with ethical principles do also contradict

with the provisions of Disciplinary Regulation and/or the contradicting issue is repeated within the validity period, the issue is directly referred to Disciplinary Committee.

Furthermore, the investigation of whistleblown issues that are not covered by A&T Bank's Code of Conduct and Ethical Principles, but defined in Disciplinary Regulation, is conducted by Inspection Council and/or Compliance and Internal Control Department, based on its subject.

3.9 EXPECTATIONS FROM WHISTLEBLOWER

Whistleblowers are expected to provide as sufficient and detailed information as possible in order to ensure that the whistleblown issue is understood clearly and evaluated correctly and fairly.

Therefore it is expected from whistleblowers to provide the answers of below questions as much as possible in their notifications:

- Name(s) of person(s) whistleblown;
- Detailed information about the issue:
 - When / where / between whom the issue was occurred?
 - How many times it has occurred? Is it repeating? When was the first time it was occurred?
 - If it has not occurred yet, when it is expected to occur?
 - When the whistleblower noticed the issue?
 - Who else is aware of the issue? If the managers are aware of the issue, have they taken any action to prevent it?
 - Has the whistleblower directly witnessed the issue or heard it from someone else?
 - Is there any evidence about the whistleblown issue?

3.10 PROTECTION OF DATA AND STORAGE OF DOCUMENTS

Records about whistleblowing are confidential. These records are kept securely and in accordance with internal regulations of the corporation as well as applicable laws and legislations. These records are stored by units responsible for whistleblowing and only the persons, who need to access such records due to their duties, are allowed to access them.