

**I. OBJECT AND SCOPE**

This policy covers all employees and participations of İşbank (the Bank), the individuals and corporations that act in the name of or provide services to the Bank including outsourcing companies, suppliers, consultants, external auditors and representatives. This Policy aims to enable the compliance of the aforementioned parties with the effective antibribery and anti-corruption regulations, as well as İşbank's Ethical Principles and Code of Conduct.

**II. DEFINITIONS**

Corruption refers to demanding, offering, giving or receiving any kind of unjust gain or unlawful benefit by any stakeholder that obstructs the fulfillment of his responsibilities in compliance with the law.

Bribery refers to obtaining of benefits by a person either directly or indirectly in order to do or not to do an act in relation to the performance of his duties.

**III. FOUNDING PRINCIPLES**

1. Within the framework of international practices, the Bank defines high risk areas where bribery and corruption can occur as follows:

- gifts and hospitality activities
- donations and sponsorships
- facilitation payments
- outsourcing companies and business partnerships
- abuse of title and duty

High risk areas were taken into consideration while establishing the principles of this policy

2. No payments shall be made, no gifts shall be provided and no personal payment, aid or grant shall be given to any state officer, any other person, institution or organization directly/indirectly in order to influence a decision that is related to the continuation of the Bank's activities or that may be beneficial for the institution.
3. It is prohibited for the Bank to make political donations/contributions/spending and a payment of similar in nature, to use the opportunities and facilities it owns in order to contribute to a political party/candidate or institution.
4. The gifts given by the Bank shall not aim at influencing the parties related to a procurement or agreement, to which the Bank is a party.
5. The Bank does not tolerate offering of any facilitation payments by its employees in their relations with the third parties.
6. The donations and sponsorships of the Bank must be in compliance with the effective legislation, İşbank Donation and Contribution Principles and internal regulations of the Bank.
7. The employees of the Bank shall not demand or accept any gifts from third parties including İşbank Group companies, in violation of the provisions of the Bank's Gifts and Hospitality Policy and may not engage in any behaviors that might be interpreted as such. In case a Bank employee believes that his life or liberty is in danger due to an unlawful payment demand, he/she must receive or make such payment and immediately report this situation to his/her supervisor.
8. The employees of the Bank shall not use their duties and authorities, under any circumstances, for the benefit of themselves, their families or third parties in order to obtain personal or private gains.
9. The employees of the Bank, shall not receive or shall not be promised to receive any kind of benefit under any name or title either directly or via an intermediary for themselves, their families or third parties by consciously or intentionally misusing their title or duties through mutual agreement, inducement or compulsion.
10. The Bank carries out research and due diligence, regarding bribery and corruption issues, before building business relationships with the parties stated in the "I. Object and Scope" section of this policy. The Bank does not build any relationship with persons or institutions that have been realized to be engaged in bribery or corruption. In case bribery or corruption claims arise about the persons/institutions with whom the Bank is in relation and the claims are proven with a judicial decision, this business partnership shall be terminated immediately.

11. The Bank records and preserves all kinds of accounts, invoices and documents related to transactions carried out with third parties within the scope of the legal regulations that it has to comply with in terms of accounting and registration system.
12. The individuals and corporations that act in the name of or provide services to the Bank including outsourcing companies, suppliers, consultants, external auditors and representatives must comply with the legislation and all the effective anti-corruption laws.
13. The Bank regularly provides trainings for its employees on the Anti-Bribery and Anti-Corruption Policy. The employees shall sign a document declaring that they would comply with the provisions of the Anti-Bribery and Anti-Corruption Policy and accept the results of any violating actions. Employees use the Ethics Line to report violations of regulations or to consult in case of any doubt regarding that issue.
14. The employees, who refuse to pay bribe or that denounce activities/attempts against the provisions of this policy in good faith and according to honesty and transparency principles, shall not become subject to any punishment and/or maltreatment depending on their behaviour.
15. For the behaviors which are identified as violation of the principles of this policy, required disciplinary sanctions, including termination of the contract of employment, are imposed within the frame of the related provisions and procedures of the Personnel Regulation and Collective Bargaining Agreement. The judicial bodies shall be notified if required by law.

#### **IV. SUPERVISION/AUDIT**

This policy is executed by the related Head Office divisions under the supervision of the Human Resources Committee. Compliance with the provisions of this policy is audited within the context of internal audit. Principles to perform the action plans that are required for the elimination of findings detected during the aforementioned audits are determined by the Human Resources Committee.

#### **V. REVISION**

At least once in a year, this policy is reviewed by the Human Resources Committee in accordance with the requirements and changing operating conditions. Required revisions and amendments, which are submitted to the Board of Directors by the Human Resources Committee, go into effect with the approval of the Board.

This policy is available on the corporate website of İşbank.

#### **IV. EFFECTIVENESS**

This policy has been approved by the Board of Directors and gone into effect on the date of 31.12.2014.