



TÜRKİYE İHRACAT KREDİ BANKASI A.Ş.
ANTI-BRIBERY/ANTI-CORRUPTION AND ETHICS POLICY

REGULATORY COMPLIANCE DEPARTMENT
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ANTI-BRIBERY/ANTI-CORRUPTION AND ETHICS POLICY

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Page: 1 of 12

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CONTENTS

1. PURPOSE	4
2. SCOPE	4
3. BASIS	4
4. DEFINITIONS.....	5
5. RISK AREAS WHERE BRIBERY AND CORRUPTION MAY OCCUR	6
6. ETHICAL PRINCIPLES	6
7. OUR BANK'S APPROACH AND COMMITMENT	8
8. LIABILITIES.....	8
8.1. Liabilities of the Bank	8
8.2. Liabilities of Employees and Related Parties/Institutions	9
9. POLICY VIOLATIONS AND SANCTIONS	11
10. REPORTING OF VIOLATIONS.....	11
11. TRAINING	12
12. REVIEW.....	12
13. ENFORCEMENT	12
14. EXECUTION.....	12

1. PURPOSE

(1) With the Anti-Bribery/Anti-Corruption and Ethics Policy (the "Policy"), Türkiye İhracat Kredi Bankası Anonim Şirketi aims to clearly and explicitly state its commitments on anti-bribery/anti-corruption and ethics. The objective is to identify potential actions within this scope, determine rules and responsibilities for prevention, raise employee awareness, and ensure compliance with national and international regulations.

2. SCOPE

(1) The Anti-Bribery/Anti-Corruption and Ethics Policy applies to the following parties:

- All employees of our Bank, including members of the Board of Directors, General Manager, and Senior Managers,
- Employees of both existing and future representative offices and subsidiaries of our Bank, irrespective of their shareholding,
- Companies/business partners and their employees providing services to us,
- Individuals and organizations acting on behalf

of our Bank.

(2) This Policy is an integral part of the Bank's Ethical Principles and Human Resources Regulation, as well as the relevant internal and external legislation.

3. BASIS

(1) This Policy is crafted based on the provisions outlined in the following:

- Banking Law No. 5411,
- Regulation on Corporate Governance Principles of Banks,
- Regulation on Principles of Ethical Behavior of Public Officials and Application Procedures and Principles,
- Convention on Combating Bribery of Foreign Public Officials in International Business Transactions,
- Banks Association of Turkey (TBB) Code of Banking Ethics,
- Our Bank's Human Resources

Regulation.

(2) Within the framework of this Policy, adherence to ISO 37001 Anti-Corruption Management System Standards is also embraced as a guiding principle.

4. DEFINITIONS

(1) For the purposes of this Policy;

a) **Bribery** is defined as: Providing illegal or unjustified benefits,

- Promising or offering an unfair advantage,
- Offering direct or indirect payments or benefits,
- Demanding or accepting the aforementioned for the

same reasons,

- with the aim of influencing our Bank's employees and other related parties to:
- Act in a manner that violates their duties,
- Perform or refrain from doing a job contrary to the requirements of their duties,
- Ensure that their decisions and practices are influenced in favor of themselves or another person.

b) **Corruption:** refers to the misappropriation of assets by the Bank's employees and other related parties during the execution of their duties. It involves obtaining unfair benefits, using their influence or title for this purpose, not fulfilling their duties adequately or at all, and causing harm to the reputation and interests of our Bank.

c) **Ethics:** refers to the values, norms, and rules forming the foundation of individual and social relations. It encompasses the entire set of criteria that morally evaluate concepts such as right/wrong or good/bad.

ç) **Ethical Principles:** refer to the principles that our Bank's employees must adhere to while fulfilling their duties, as well as the regulations regarding the working order.

d) **Gift:** refers to all kinds of goods, rights, and benefits, whether with or without economic value, accepted directly or indirectly. These items refer to factors that affect or are likely to affect the impartiality, performance, judgment, or conduct of the Bank's employees.

e) **Public Official:** refers to a person who participates in the execution of a public activity through appointment, election, or any other means on a permanent, fixed term, or temporary basis.

f) **Conflict of Interest:** refers to the situation in which our Bank's employees and other related parties receive various benefits for themselves, their relatives, friends, or individuals or organizations with whom they have a relationship. This includes financial or other obligations related to them, creating similar personal interests that may affect the impartial and objective performance of their duties.

5. RISK AREAS WHERE BRIBERY AND CORRUPTION MAY OCCUR

(1) Risk areas susceptible to bribery and corruption, along with the Bank's approach to these issues, are outlined below.

a) Gift: It is imperative that our Bank's employees refrain from directly or indirectly requesting gifts, abstain from accepting gifts even when not on duty, and avoid seeking or receiving loans from individuals and organizations related to their work.

b) Hospitality: The offers of hospitality conveyed to our Bank's employees must not contravene the provisions of this Policy, lead to a conflict of interest, or give rise to situations that may be perceived as such. The principle adopted is that hospitality extended by our Bank to third parties, in cases of business necessity, should be devoid of any intention to confer purely business-related benefits.

c) Facilitation Payments: Our Bank unequivocally rejects offers from related individuals and organizations concerning potential facilitation payments to secure or expedite routine transactions or processes.

ç) Political Activities: It is essential that no corporate or personal payments, gifts, assistance, or donations are made to public officials or politically influential individuals to influence any decisions regarding the continuation of our Bank's activities or during the procurement and/or provision of services that may benefit our Bank.

d) Donations and Charities: All types of in-kind/cash donations and charities are managed by considering the relevant provisions of Banking Law No. 5411 and acknowledging our Bank's status as a public institution.

e) Accuracy of Records: Our Bank meticulously records and preserves all accounting transactions, accounts, invoices, and documents in a comprehensive, precise, transparent, and accurate manner in accordance with current legal regulations. There is a strict policy against falsifying accounting or other commercial records related to any transaction and the associated documents.

6. ETHICAL PRINCIPLES

(1) Our Bank considers ethical principles in all its activities to regulate the attitudes and behaviors of its employees and their relations with individuals, institutions, and organizations both inside and outside the Bank. It is imperative that all our employees observe and adhere to these principles during their duties.

(2) Our Basic Ethical Principles are outlined below.

a) **Reliability:** In all services and transactions, customers receive clear, understandable, and accurate information within a framework of mutual trust.

b) **Impartiality:** No discrimination is made among employees and customers, prejudiced behavior is avoided, and differences such as language, religion, race, financial and social status, gender, etc., are not considered while providing services.

c) **Honesty:** The principle of honesty is adhered to in relations while carrying out activities.

ç) **Transparency:** Customers are informed in a clear, comprehensible, and explicit manner regarding issues such as rights and obligations, benefits, and risks related to the products and services offered to them.

d) **Observing Social Benefit and Respect for the Environment:** All activities are carried out in line with the principles of observing social benefit and respect for the environment.

e) **Combating Laundering of Assets Arising from Crime and Financing of Terrorism:** The Bank, within the framework of international standards/recommendations and national legislation provisions, has adopted the combat against the laundering of assets arising from crime, corruption, and similar offenses as a fundamental principle. In this context, necessary measures are taken, and training programs are organized for the Bank's employees.

f) **Prevention of Information Misuse:** All necessary measures are taken to prevent the misuse of information.

g) **Careful Preservation of Customer Secrets:** Information and documents that are customer secrets, within the scope of the relevant provisions of the Banking Law, shall not be shared with third parties except for the authorities expressly authorized by law and without prejudice to the mandatory provisions of other laws. They shall be kept confidential and carefully preserved, except for cases exempted from the confidentiality obligation specified in the Banking Law.

ğ) **Optimized Use of Resources:** Assets and resources are used in accordance with their purpose; they are protected against possible loss, damage, misuse, abuse, theft, and sabotage.

ı) **No Unfair Advantage:** Under no circumstances should an unfair advantage be granted, or a loss eliminated in a manner that would undermine equal opportunities, regardless of the purpose.

i) **Attention to Behavior and Appearance:** Our Bank's employees act in compliance with ethical principles and take care to ensure compliance with the reputation of the banking profession.

7. OUR BANK'S APPROACH AND COMMITMENT

- (1) Our Bank ensures the thorough evaluation and, when necessary, investigation of any instances violating the practices outlined in this Policy against acts of bribery/corruption and the breach of ethical principles. All required processes are carried out within the framework of legal legislation and Our Bank's Human Resources Regulation.
- (2) Our Bank is dedicated to conducting its activities in accordance with fair, honest, legal, and ethical principles. It commits to implementing and continually improving the necessary measures to combat bribery and corruption within its operational framework.
- (3) Our Bank adheres to the relevant legislation in the fight against bribery and corruption, basing its efforts on ISO 37001 Anti-Corruption Management System Standards.
- (4) Operational monitoring and control mechanisms are in place to prevent and detect bribery and corruption risks and potential acts of corruption. Measures are taken, and training programs are implemented to enhance awareness among the Bank's employees, business partners, and other related parties in these areas.

8. LIABILITIES

8.1. Liabilities of the Bank

- (1) Our Bank combats the laundering of assets arising from crime, corruption, and similar offenses in line with international standards/recommendations and provisions of national legislation. This is to ensure and uphold the prestige, reliability, and reputation of the banking profession in society and to safeguard stability and trust in the banking sector.
- (2) Our Bank operates in compliance with legal regulations in all its domestic and international transactions.
- (3) The Bank takes measures to ensure adherence to relevant legislation/standards, especially the provisions of the Regulation on Principles of Ethical Behavior of Public Officials and Application Procedures and Principles, Regulation on Corporate Governance Principles of Banks, TBB Banking Ethical Principles, and ISO 37001 Anti-Corruption Management System Standards.
- (4) Our Bank strictly prohibits all forms of bribery and corruption, including facilitation payments, whether direct or indirect, whether given to the employee or a relative.

- (5) Our Bank prohibits its employees or third parties/institutions from providing gifts to political parties, making political donations, and/or offering gifts and/or hospitality to individuals/candidates with political influence/positions on behalf of our Bank.
- (6) Our Bank assesses risks in accordance with the principles outlined in this Policy and establishes necessary control mechanisms.
- (7) Our Bank evaluates the potential for bribery and corruption in all transactions and activities to reveal or detect instances of bribery and corruption in the present and past.
- (8) Our Bank accepts and applies TBB Banking Ethical Principles as a minimum requirement within a transparent and honest management approach.
- (9) Our Bank fosters a working environment where employees can voice concerns in good faith, without fear of reprisal, and ensures confidentiality is protected.
- (10) Our Bank, to establish institutional infrastructure within the Bank regarding the violation of ethical principles, bribery, corruption, and similar economic crimes, ensures:
 - The active operation of the Anti-Bribery/Anti-Corruption and Ethics Committee,
 - Maintenance of awareness regarding these issues during the execution of internal control and internal audit activities,
 - Establishment and active utilization of notification channels related to these issues,
 - Taking necessary actions for emerging factors.
- (11) Our Bank subjects the act of taking or giving bribes to the most severe penalty of "immediate termination of the contract" within the framework of the provisions of the Human Resources Regulation.

82. Liabilities of Employees and Related Parties/Institutions

- (1) In accordance with the "Regulation on the Principles of Ethical Behavior of Public Officials and Application Procedures and Principles," it is a fundamental principle that employees of our Bank and those conducting business on its behalf should refrain from receiving gifts, giving gifts to public officials, or deriving benefits from their duties. Employees are prohibited from directly or indirectly soliciting gifts, accepting gifts beyond their official duties, and seeking or accepting loans from business owners.

- (2) Employees violating these principles shall be subject to the relevant disciplinary provisions outlined in the Bank's Human Resources Regulation.
- (3) Although not accepting gifts is the basic principle, employees of our Bank may accept gifts that do not belong to them personally, are given to the legal entity and/or unit of our Bank, have a place in the culture and traditions of our country, have a symbolic meaning, and are not continuous, provided that a senior manager is informed and approval is obtained. However, gifts that may lead to a conflict of interest or that may be perceived as such should not be accepted.
- (4) Employees of our Bank and other related parties bear personal responsibility for managing conflicts of interest. Being typically aware of situations that might lead to conflicts of interest, they approach such scenarios with care. They proactively take necessary steps to prevent or address conflicts, promptly informing a senior manager when such situations arise. Additionally, they refrain from engaging in activities that could potentially result in conflicts of interest.
- (5) Employees of our Bank are obliged to comply with this Policy and the internal regulations of our Bank, all applicable legislation regulating bribery, corruption, and similar economic crimes, and the ethical principles of our Bank.
- (6) The managers of all units of our Bank are responsible for taking the relevant measures within the framework of their respective areas of responsibility in order to assess potential risks, create awareness among the employees under their management, and ensure that external service providers and business partners comply with the principles of this Policy.
- (7) Acceptance of gifts by our Bank's employees that may affect/likely to affect their impartiality, performance, decisions, or performance of their duties, participation in invitations/reception offers that are not related to the work directed to them or that exceed the limits required by the job, regardless of who and to whom the offer is made (to themselves, their relatives, friends or persons or organizations with whom they have relations) are prohibited under this Policy.
- (8) Employees of our Bank are obliged to comply with the relevant provisions of the "Regulation on Principles of Ethical Behavior of Public Officials and Application Procedures and Principles" regarding receiving gifts and providing benefits. All employees are obliged to report any suspicious situation or activity related to bribery, corruption, and similar economic crimes related to the Bank's activities or other processes of the Bank's employees, customers, and third parties through the methods specified in the process documents, which are annexed and integral parts of this Policy.

- (9) Employees are prohibited from making any transaction to gain an unfair advantage in favor of themselves or another person or organization while performing their duties. Employees may not use their duties and authorities assigned to them for private benefit in a manner that will provide an unfair gain in favor of themselves, their relatives, or any other third persons or entities or that will cause damage to the Bank and/or its customers.
- (10) Persons and organizations acting on behalf of the Bank or providing services to the Bank, including companies, suppliers, consultants, external auditors, and representatives from which the Bank purchases external services, must comply with the relevant legislation and ISO 37001 Anti-Corruption Management System Standards. In case of non-compliance, business relations with the relevant persons and organizations may be terminated.

9. POLICY VIOLATIONS AND SANCTIONS

- (1) Depending on the nature of the matter, employees who violate this Policy may face various sanctions and disciplinary penalties, including immediate termination of the contract.
- (2) Employees reporting incidents contrary to the principles of this Policy in good faith, within the framework of honesty and transparency, shall not face any penalty, ill-treatment, or retaliation for their notification.
- (3) Behaviors contrary to the Policy shall be reported to judicial authorities when legal conditions occur, depending on the nature of the matter.

10. REPORTING OF VIOLATIONS

- (1) The Bank has an "Anti-Bribery/Anti-Corruption and Ethics Committee" in order to protect/enhance the Bank's reputation, protect customers and employees, ensure compliance with ethical principles, and combat corruption/bribery. This Committee operates independently and is directly accountable to the Board of Directors.
- (2) The Committee's primary responsibilities include providing necessary support, direction, and information on the subject, offering guidance, advice, and suggestions to employees to ensure full compliance with ISO 37001 Anti-Corruption Management System Standards by our Bank, and coordinating review and reporting activities.
- (3) The Bank facilitates the reporting of concerns to the Anti-Bribery/Anti-Corruption and Ethics Committee through methods specified in the process documents, which are annexes and integral parts of this Policy.

(4) Notifications are treated with complete confidentiality. After a preliminary evaluation by the Committee Secretariat, matters are either brought to the Committee's agenda or forwarded to the Board of Internal Auditors, depending on the nature of the issue. In all activities, priority is given to acting in accordance with the principle of preventing harm to the notifying party.

11.TRAINING

- (1) Our Bank conducts training sessions for its employees to enhance their awareness and understanding of combating bribery, corruption, and similar economic crimes, as well as ethical principles.
- (2) This Policy is communicated to all employees through the Bank's various communication channels and is made easily accessible on the Bank's intranet portal.

12.REVIEW

- (1) This Policy undergoes regular evaluations to ensure alignment with current organizational changes, business needs, legal and technical regulations, etc. In any case, it is reviewed annually, and any necessary modifications are made and publicly announced on the website.
- (2) The authority to amend this Policy lies with the Office of the General Manager, and the authority to create a new policy superseding or completely repealing the existing Policy belongs to the Board of Directors. The General Manager may leverage the efforts and recommendations of the Anti-Bribery/Anti-Corruption and Ethics Committee for Policy amendments. The Anti-Bribery/Anti-Corruption and Ethics Committee shall report to the Board of Directors on any changes made to the Policy.
- (3) Within the framework of this Policy, the Office of the General Manager is empowered to develop, implement, and ensure the execution of the Bank's internal procedural documents.

13.ENFORCEMENT

- (1) This Policy enters into force as of the date of its publication.

14.EXECUTION

- (1) Provisions of this Policy are executed by the Board of Directors.