

ATKIF YATIRIM BANKASI A.S.

ANTI-BRIBERY AND CORRUPTION POLICY

1. PURPOSE AND SCOPE

The purpose of Aktif Yatırım Bankası A.Ş. Anti-Bribery and Corruption Policy [“Policy”] is to ensure compliance of bank employees with the then-current legal regulations against bribery and corruption as well as to the ethical principles and other international standards. With this policy that we see as an integral part of our other policies as Aktif Bank we take a zero-tolerance approach to bribery and corruption.

2. RESPONSIBILITIES

The implementation and updating of the Policy shall be ensured through assignments made by the Board of Directors.

Employees of our bank are required to comply with the legal regulations and ethical principles have been established and related duties and responsibilities have been written down and approved by the upper management. Managers of all groups of our bank are responsible for assessment of potential risks and compliance of employees, outsource companies and partners to this Policy within their scope of duties.

Bank Supervisory Commission inspects activities of the Bank to be sure that such activities are compliant to related regulations and policies. Also, at the end of inspection, Commission notices competent bodies for improvement of the related policy.

3. DEFINITIONS

Bank: Aktif Yatırım Bankası A.Ş.

Corruption: The misuse of the authority held due to the position held or not fulfilling duties for the purpose of gaining advantage directly or indirectly in an unlawful way.

Bribery: A person’s gaining benefit within the framework of an agreement entered into with a third party so that such person acts in breach of the requirements of his/her duty by performing or not performing a work, speeding up or slowing down.

Legislation: All legal arrangements that banks have to comply while they are conducting business activities.

4. PROCEDURE

4.1. Major Risk Areas

4.1.1. Gifts

A gift is a product generally given as a means of appreciation or commercial courtesy and which does not require a financial payment.

All kinds of gifts given to third parties by the Bank are offered as an act of our goodwill. In order not to cause any conflict of interest or perceived as such, no gift must be neither accepted nor offered except low priced symbolic one given not to the person but his/her company. Actions should be taken for rules and limits of gifts within the context of 04.000.P001 Human Resources Practices Procedure.

4.1.2. Political Donations

It is essential that the Bank does not make any corporate or individual payment, give any gift, provide financial aid or donation to any government official or political party candidate about topics written below;

- Continuity of banking operations
- Service procurement or rendering stage for the benefit of the Bank.
- Influence any decision

4.1.3. Hosting Policy

Hosting activities, such as social events, accommodation and banqueting, may be offered to third parties for establishing a commercial communication network or for developing an existing relationship. Among such third parties, customers, consultants, lawyers, auditors and other companies who have business relationship with the Bank can be mentioned. Such hosting activities offered by Bank should be offered publicly, unconditionally and as an act of good will. Limits, decision authorities and actions should be taken when the limit is exceeded are defined in 18.020.P004 Aktif Bank Expense Management Procedure.

4.1.4. Outsourcing Companies and Business Partners

Outsourcing companies and business partners are required to comply with the principles of the Policy and other relevant regulations. The Bank terminates its relations with the persons or institutions failing to comply with the Policy of the Bank.

Bank does not work with any company having a negative intelligence. In the selection of outsourcing companies and their business partners, having policies equivalent to the Bank's policies and ethical principles are paid regard to. All related units involved in the purchase of an outsourced service are subjected to the Bank's internal audit and compliance with the abovementioned principles is evaluated during audits.

4.1.5. Facilitation Payments

Persons and institutions within the context of this Policy are not allowed to offer facilitation payments in order to guarantee or accelerate a routine transaction or process (obtaining authorization and license, providing document, etc.) with government agencies.

4.2. Correct Recordkeeping

In the context of legal regulations about the accounting and recordkeeping system, all kinds of accounts, invoices or other documents related to dealings with third parties (customers, suppliers, etc.) should be recorded and kept completely, accurately and reliably. Any falsification of commercial or similar records and any false representation should be avoided. Mistakes while keeping accounting records and/or making payments to customers/companies will be exempt from this procedure if no harm is intended.

4.3. Reporting The Cases and Conducts Contrary to The Policy

The Bank employees and the persons acting on behalf of the Bank are obliged to directly report to the Bank Supervisory Commission or Internal Systems Group Head any person or institute acting contrary to the rules of this Policy or any case in violation of the rules by mail or e-mail. By keeping the notifications strictly confidential, employees are kept off from being subject to mistreatment (disciplinary punishment, firing, threatening, mobbing, etc.) in any kind. All notifications both from inside the Bank and outside the Bank are recorded and upper management is informed through frequent reports on results of such notifications. For the reputation of the Bank, strengthen corporate management and in order not to have a negative impression on our employees, customers and stakeholders and 02.030.P005 Notification Line Procedure is established.

4.4. Sanction

Any violation of Anti-Bribery and Corruption Policy may lead to disciplinary action. In light of 04.010.P002 Discipline Procedure, an inspection is conducted by Bank Supervisory Commission. Commission presents the inspection results to Disciplinary Committee that decides the proper sanction and enforces it.

5. DOCUMENTATION

- 02.030.P005 Notification Line Procedure
- 04.010.P002 Discipline Procedure
- 04.000.P001 Human Resources Practices Procedure
- 18.020.P004 Aktif Bank Expense Management Procedure

