



## **ANTI-BRIBERY AND ANTI-CORRUPTION POLICY**

## **ANTI-BRIBERY AND ANTI-CORRUPTION POLICY**

### **1. PURPOSE**

The purpose of this Policy is to establish our Bank's policy on combating bribery and corruption.

### **2. SCOPE AND APPLICATION**

This Policy applies to all operations, activities, and customer services carried out by Anadolubank A.Ş. Headquarters and Branches, as well as Anadolubank A.Ş.'s branches, agencies, representatives, commercial agents, and similar affiliated units operating abroad, to the extent permitted by the legislation and competent authorities of the country in which they operate.

### **3. APPLICATION PRINCIPLES, DUTIES, AND RESPONSIBILITIES**

This Policy is approved by the Board of Directors of our Bank. The responsibility for updating the Policy lies with the Internal Control and Compliance Department, and the Policy is updated by taking into consideration the opinions of the Audit Committee, the Internal Control and Compliance Department-Internal Control Unit, the Risk Management Department, and the Legal Advisory Office, and by assignments made by the Board of Directors. The Departments/Units comprising the Internal Systems Department shall take the necessary measures to ensure the implementation of the principles set forth in this Policy as part of their duties and responsibilities. The Policy shall be reviewed by the Audit Committee and the Internal Control and Compliance Department-Internal Control Unit.

The Anti-Bribery and Anti-Corruption Policy applies to all operations and activities of Anadolubank A.Ş. The implementation, execution, and responsible parties of the rules outlined in the Policy are governed by POL/079 Anadolubank A.Ş. Anti-Bribery and Anti-Corruption Policy, POL/065 Anadolubank Ethics and Integrity Policy, and POL/056 Anadolubank Corporate Policy. The measures taken by our Bank in this regard shall be set out in consideration of these documents.

All employees of Anadolubank A.Ş., as well as external service providers, business partners, and their employees, are required to comply with the provisions of this Policy as part of their duties. The departments authorized by the Board of Directors of Anadolubank A.Ş. are ultimately responsible for the adequate and effective implementation of the Policy in a manner consistent with the scope and nature of the Bank's activities. Other departments of our Bank shall also take the necessary measures to ensure compliance with the principles of the Policy as part of their duties.

### **4. OUR PRINCIPLES REGARDING ANTI-BRIBERY AND ANTI-CORRUPTION**

Anadolubank A.Ş. is committed to complying with all principles and regulations concerning anti-bribery and anti-corruption. All employees of our Bank, external service providers, business partners, and their employees are obligated to act in accordance with anti-bribery and corruption laws, ethical rules, and integrity principles as Anadolubank A.Ş. has a zero-tolerance policy toward bribery and corruption.

#### **4.1. Gifts and Donations**

Bank employees shall comply with the procedures and principles set forth in Anadolubank's Ethics and Integrity Policy when giving gifts or making donations to third parties. The Bank shall take the necessary measures within the framework of the procedures and principles set forth in Anadolubank's Organizational Policy when establishing business relationships with customers and monitoring their operations.

#### **4.2. Relationships with External Service Providers**

All external service providers, including support services, as well as their business partners and employees, are required to comply with this Policy and the ethical principles and integrity rules. If there is any information, report, or suspicion regarding the service provider that is contrary to our Anti-Bribery and Corruption Policy, the service shall be terminated or the business relationship shall not be established.

## **ANTI-BRIBERY AND ANTI-CORRUPTION POLICY**

### **4.3. Banking Transactions That May Be Subject to Bribery and Corruption**

The relevant units of our Bank shall make the necessary efforts to effectively combat bribery and corruption. Potential risks and high-risk services and activities shall be identified, and necessary measures shall be taken. In particular, companies and their partners that have been awarded public tenders and have or will have business relations with our Bank shall be considered high-risk clients in terms of bribery and corruption. Therefore, information about such clients shall be collected to the extent necessary in accordance with this Policy, and their transactions shall be monitored.

### **4.4. Conflict of Interest**

Bank personnel shall take care to ensure confidentiality when using confidential and internal information while performing their duties. The Bank shall take all necessary measures and conduct the necessary audits to prevent its personnel from engaging in any business or transaction that may cause a conflict of interest, subject to the principles set forth in this article.

A “conflict of interest” arises when the personal interests of an employee conflict with the interests of Anadolubank A.Ş. or when the interests of the parties involved conflict with each other, including but not limited to the following cases.

Although a conflict of interest may arise without any unethical or inappropriate behavior, inappropriate conduct that abuses the Bank's trust may also result in a conflict of interest.

This article explains the following conflict of interest cases.

- Conflict of interest arising from investment services and activities;
- Conflict of interest arising from an employee's interests outside the workplace;
- Conflict of interest arising from banking activities and services;
- Conflict of interest involving organizational and corporate matters, etc.

Anadolubank A.Ş. and its affiliates are committed to acting with integrity and fairness when advising clients and acting on their behalf. Bank employees shall be aware of any significant interests they or Anadolubank A.Ş. may have that could influence their actions when providing services to or advice clients outside of standard commercial relationships.

### **4.5. Facilitation Payments**

The Bank does not permit offers of facilitation payments to secure or expedite a routine transaction or process.

## **5. TRAINING**

The Bank provides its employees with the necessary training to combat bribery and corruption. Such training includes information on the procedures and principles set forth in this Policy, as well as training on the prevention of money laundering and financing of terrorism.

## **6. DETECTION AND REPORTING**

The Bank takes the necessary measures and precautions regarding any transactions, requests, and information and documents that may raise suspicion of possible or actual bribery or corruption.

## **ANTI-BRIBERY AND ANTI-CORRUPTION POLICY**

Such detection efforts and measures may be performed using methods applied by the units comprising the Internal Systems Department, and such measures shall be applied by all branches and departments of the Bank.

Bank employees or persons acting on behalf of the Bank are obligated to immediately and directly report any situation that violates the rules set forth in this Policy to the Audit Committee or the Ethics Hotline.

### **7. PENALTIES**

Bank employees who fail to comply with or implement the principles and procedures set forth in this Policy shall be referred to the Disciplinary Committee.

The Bank and any employee involved in such violation or who have been part of such transaction may also face penalties prescribed by other laws prohibiting bribery and corruption in accordance with the Application Procedure for the Prevention of Money Laundering (PRO/033) (additionally, Bank employees may also be subject to the penalties specified in the YON/001 Personnel Regulation).