

CODE OF CONDUCT POLICY



TABLE OF CONTENTS

1. PURPOSE AND SCOPE	1
2. OUR BASIC ETHICS PRINCIPLES	1
3. OBLIGATION TO RAISE ETHICAL ISSUES	1
4. CONDUCT TOWARDS OUR CUSTOMERS	2
4.1 Clarity, Accuracy and Reliability.....	2
4.2 Non-discrimination.....	2
4.3 Realization of Customers' Transactions.....	2
4.4 Know Your Customer.....	3
4.5 Customer Satisfaction.....	3
5. CONDUCT TOWARDS OUR COLLEAGUES	3
5.1 Respect: Non-tolerance of Discrimination, Harassment or Bullying.....	3
5.2 Management Style: Responsibility and Team.....	3
5.3 Occupational Health and Safety.....	4
6. CONDUCT TOWARDS OUR BANK	4
6.1 Compliance with the Legislation.....	4
6.2 Compliance with the Principles of Participation Banking.....	4
6.3 Professional Life.....	5
6.4 Record Creation and Management.....	5
6.5 Cooperation with State Institutions and Organizations.....	5
6.6 Relations with Media.....	5
6.7 Competitor and Competition Relations.....	6
6.8 Protection of Bank's Assets.....	7
6.9 Personal Financing Standards.....	9
6.10 Conflict of Interest.....	9
7. CONDUCT IN SOCIETY	12
7.1 Anti-money Laundering and Prevention of Financing Terrorist Activities.....	12
7.2 Embargoes and Sanctions.....	12
7.3 Fighting Against Bribery and Corruption.....	12
7.4 Our Commitments Regarding the Environment.....	12
7.5 Obligations Related to Tax and Social Security Systems.....	13
7.6 Contribution to Society.....	13
7.7 Political Neutrality Policy.....	13
8. APPLICATION OF THE CODE	13



I. PURPOSE AND SCOPE

Our Code of Conduct Policy, to which we, as Türkiye Finans Participation Bank and its employees, have to obey includes the principles and rules related to working order. The purpose of these principles and rules of conduct is to ensure that we, as our bank and its employees, perform all the work, related to the bank, inside the bank or outside, in accordance with the framework of these principles.

Our Code of Conduct Policy constitutes a whole with Participation Banks Association of Turkey's "Principles of Banking Ethics" and Turkish Capital Markets Association's "Code of Ethics and Standards of Professional Conduct" and they become among the resources which we can benefit from when necessary.

2. OUR BASIC ETHICS PRINCIPLES

We aim to make our understanding of "Principled Banking" dominate our relations with our stakeholders who are our customers, our employees, our shareholders, society, suppliers, and Official and Regulatory Authorities.

For this aim, our basic ethics principles guide us in all our procedure and conduct.

- Integrity** : We stick to the integrity principle in all our works and activities.
- Justice** : We observe and protect the rights of our stakeholders in all circumstances.
- Impartiality** : We act being aware that respect to people is the foundation of success, and we do not discriminate in any circumstances and conditions.
- Reliability** : We provide our customers and all other stakeholders with clear, comprehensible and accurate information, in all services and our transactions, and we provide service in a timely manner, complete and in accordance with the promises made.
- Compliance** : We comply with all legislations, regulations and standards, we offer our service in accordance with our Participation Banking principles.
- Transparency** : Excepting information of a secret nature, we inform the customers and the public fully, accurately and in a timely manner.
- Observing Social Benefit and Respect for the Environment** : Besides profitability, we act with conscious of observing the social Benefit and Respect to Environment in all our activities and we care to provide support for social and cultural activities.

3. OBLIGATION TO RAISE ETHICAL ISSUES

Our Code of Conduct Policy, provides a summary of the principles and rules regarding working order. We know that, the principles and rules we are required to observe in our attitudes and works, are not limited with this summary and it is not impossible to put all the codes of ethics in writing. When we face a situation that is not written here, we act in the light of our basic principles, and we consult with our superiors when we are not sure.

We know that we should comply with the ethical principles in their entirety in order to maintain and perpetuate the success and reputation of our Bank. Unethical behavior of just one of us may imperil our reliability and work before our stakeholders. Hence, we certainly inform our superiors and/or Ethics Line when we come across or suspect a behavior or transaction contradicting with our principles.

Our Bank encourages us to bring forward the situations contrary to ethics, our concerns and questions about discrimination or harassment, and to report the other suspicions for violations of the laws, regulations and policies.

In addition, we are aware that the notifications we made via the Ethics Line will be kept confidential, and that we will not encounter any sanctions due to our notification. If we have certain reservations and if we do not want to mention our name, we know that it is possible to notify without mentioning the name (anonymously).

4. CONDUCT TOWARDS OUR CUSTOMERS

Our Bank's customers are at the focus of our activities. In relationships with our customers, we act in accordance with our customer constitution on the basis of creating mutual trust and value, and we act in accordance with our excellent service standards with our professional team.

4.1 Clarity, Accuracy and Reliability

- 4.1.1 Fair pricing for our products and services is our priority.*
- 4.1.2 We provide full, accurate and timely information to our customers regarding our Bank's products and services, as well as possible charges and revenues, and their rights and obligations.*
- 4.1.3 Especially for electronic banking, we explain our customers clearly and in a timely manner the issues they need to pay attention in the products and services they use, the favor they will gain, the costs and possible risks.*
- 4.1.4 We are careful to make open and clear explanations to customers, not to use technical terms that they may not understand, and we do not use exaggerated, misleading statements.*
- 4.1.5 We do not promise customers about products and services that we can not fulfill, we fulfill our promises and we do not allow our credibility to be damaged.*
- 4.1.6 Even including the grounds that will be for the benefit of the Bank, we do not provide incomplete or incorrect information to the customers, in no way, and we avoid behaviors and attitudes which could mean any kind of violation of the rights of the customers.*
- 4.1.7 We are aware that one of the most important elements of gaining a competitive advantage against the competitors is to provide our customers with quality service. We work to understand the customers' needs and expectations correctly and to find accurate solutions for them.*

4.2 Non-discrimination

- 4.2.1 We do not discriminate our customers on the grounds of their races, genders, faiths, religions, ethnic origins, nationalities, political views, ages, disability, marital status etc., and we provide fair and impartial services to our customers within the legislative framework.*

4.3 Realization of Customers' Transactions

- 4.3.1 We ensure all transactions comply with all legislations, regulations and our Participation Banking principles.*
- 4.3.2 We act within the framework of the designated authorizations and restrictions during our realization of all customer transactions, and we contact our superiors on matters exceeding our authorization level.*
- 4.3.3 Except for legal obligations, specifically allowed by the Bank authorities or first-degree relatives (mother, father, spouse and children), we do not make transaction on behalf of our customers, even by a power of attorney.*
- 4.3.4 We do not allow any missing procedures, such as a document, information, signature required by a transaction.*
- 4.3.5 Knowing that we comprise a whole with all our units, we do not provoke any pointless branch competition before our customers.*

4.3.6 *We do not refer to the Bank's administrative / managerial decisions, we do not deliver directly the Bank's internal correspondence to the customer, and we know that these kinds of behaviors could mean the disclosure of banking secrecy in accordance with the Banking Legislation.*

4.3.7 *We take care in the accurate and complete entry of customer information to the system.*

4.4 Know Your Customer

4.4.1 *We recognize our customers and we have enough information about the fields of operation and activities of them, and offer appropriate products and services for their financial needs.*

4.5 Customer Satisfaction

4.5.1 *Within the scope of laws and official applications, we know that it is a principle to ensure customer satisfaction in compliance with the business conduct principles of our Bank.*

4.5.2 *Where customer transactions and requests are beyond our authorizations and responsibilities or fall in areas we are not sufficiently informed on, we transfer the subject to other authorized persons or units.*

4.5.3 *We provide our customers with the best service, and provide utmost care in order not to create customer dissatisfaction in the transactions performed.*

4.5.4 *We try to settle customers' complaints in the fastest way within the framework of our Bank's procedures, and take measures to prevent them repeating.*

5. CONDUCT TOWARDS OUR COLLEAGUES

In our Bank, we aim to create a professional, dignified and happy working environment which allows our employees' professional and personal development, appreciates the skills and experience, respects the diversity, gives value to the variety and has a merit-based progress system.

5.1 Respect: Non-tolerance of Discrimination, Harassment or Bullying

5.1.1 *We respect human rights, people's individual differences and personal characteristics.*

5.1.2 *We do not allow an employee to be exposed to discrimination and harassment about issues such as race, gender, creed, religion, ethnicity, political affiliation, age, disability and etc.*

5.1.3 *We give special importance to the honor and dignity of our employees and we do not allow violation of personality values by all kinds of psychological harassment or damaging personality values by emotional attacks, whoever it comes from.*

5.1.4 *We act to ensure the formation of a professional work environment, within the framework of courtesy and respect boundaries in our relationships with each other.*

5.1.5 *We do not allow behaviors that lead to intimidating, hostile, humiliating or offensive work environment.*

5.2 Management Style: Responsibility and Team

5.2.1 *Instead of negative competition among our employees, we encourage a system which is based on the principles of solidarity and cooperation and in which success is shared.*

5.2.2 *While making a decision as part of our responsibility, we take into account related policies and procedures, the Bank's values.*

5.2.3 *We fulfill our responsibilities in accordance with the Bank's management style. We never forget that "Confidence" and "Being Team" are important values:*

- *Mutual respect and support: We behave our colleagues, as we want them to treat us.*

- *Open communication: We listen to the opinions of our colleagues and we provide our team and other people involved in the process, with the information they need to make accurate and timely decisions.*
- *Professionalism: Refraining from personal feelings and thoughts, we act in professional approach required by the business, we make efforts to do the job perfectly, without compromising quality, and we work with discipline and have the responsibility of the job done.*
- *Innovation: We research continuously to achieve the best products, services and our way of doing business, we improve ourselves and we act with the awareness that being open to change is the first step of the development.*
- *Professional improvement and promotion: We improve our team members, determine their information needs and encourage their participation in training activities.*
- *In the process of employee performance evaluation, we are objective and attentive.*

5.2.4 *We know that the progress in our career depends on our performance and merit and we act accordingly.*

5.2.5 *We are willing to share our experience, on our areas of expertise, with other bank employees.*

5.2.6 *We do not have an employee do our personal work unbefitting of his/her job description, authorization and responsibility.*

5.3 Occupational Health and Safety

5.3.1 *As employees, we show the utmost care in complying with all occupational health and safety legislation and our Bank's all occupational health and safety policies for the purpose of ensuring the safety of our workplace.*

5.3.2 *We keep our common working and living areas tidy and clean, and we act with awareness in order not to bother others.*

5.3.3 *We know all emergency plans, and our responsibilities, if any, thereunder, prepared within the framework of the Business Continuity Procedures aimed at the continuity of work by continuing to answer the needs of the market and customers in case of a fire, natural disaster, crisis or emergency situation that may disrupt the continuity of work, and we exercise such responsibilities when required.*

5.3.4 *We are aware that it is prohibited to use or to be under the influence of substances classified as a drug or illegal medicines at our work or during the performance of our work-related jobs.*

6. CONDUCT TOWARDS OUR BANK

We give utmost importance to our responsibilities towards our work and our Bank during our works and activities.

6.1 Compliance with the Legislation

6.1.1 *Banking is a sector that is subject to numerous laws and regulations. We know that we need to ensure full compliance with all laws and rules we are related to.*

6.1.2 *We do our business in the framework of our Code of Conduct Policy together with legislations, secondary regulations and professional standards.*

6.2 Compliance with the Principles of Participation Banking

6.2.1 *We carry out all our products and services in accordance with Participation Banking principles in line with Participation Banking Advisory Council's decisions.*

- 6.2.2** *While supporting productivity, we give financial support, based on strong values we have, to the industry / business fields which do not conflict with the principles of Participation Banking.*
- 6.2.3** *We know the principles of Participation Banking and we act in accordance with Participation Banking principles on all kinds of products and services offered to our customers, at any stage of the relationship of the service, and in any issue.*

6.3 Professional Life

6.3.1 Representation and Work Environment

- 6.3.1.1** *We represent the Bank in the best possible way with our mature, unpretentious and prudent manner, both during on-the-job and off-the-job hours, we avoid behavior and actions that may upset the reputation and image of our Bank, and we act with the awareness of being a respectable banker.*
- 6.3.1.2** *We show a professional attitude in our relations with third parties, such as customers and suppliers within the framework of politeness and respect.*
- 6.3.1.3** *We know the importance of complying with professional and moral principles in all our works and behaviours, and we aim to establish these values in the Bank.*
- 6.3.1.4** *We are aware of the continuous change and development in banking and capital markets. We make effort to improve our knowledge and skills and keep them up to date.*
- 6.3.1.5** *We care about our personal care and get dressed appropriate to the standing of the banking profession.*
- 6.3.1.6** *In all our correspondences, we act according to our common courtesy rules, the requirements of professional life, social norms and ethics.*
- 6.3.1.7** *We avoid all types of illegal activities, and we do not attempt to gamble or bet which do not benefit a banker.*

6.3.2 Business Hours

- 6.3.2.1** *We provide utmost care in terms of compliance with the business hours.*
- 6.3.2.2** *When we need to leave our workplace within the business hours in compulsory cases, we inform our workmates and get permission from our managers.*
- 6.3.2.3** *We provide utmost care to protect rights of our employees in cases where overtime is required and to ensure that they take their annual leaves regularly.*

6.3.3 Statutory Disclosures

- 6.3.3.1** *We inform our manager when we are subject to a legal proceedings or sanctions for any reason.*

6.4 Record Creation and Management

- 6.4.1** *We know that the records and information owned, collected, used, managed by our Bank should be accurate and complete and that we are responsible for the integrity and storage of information, reports and records that are under our control.*

6.5 Cooperation with State Institutions and Organizations

- 6.5.1** *In our relations with public authorities, we act in line with the principles of integrity, accountability and transparency, and we take care in delivering the information, documents and records requested from us for control and supervision purposes accurately, completely and in a timely manner.*

6.6 Relations with Media

- 6.6.1 Use of the Bank's Name**

- 6.6.1.1** *We know that our Bank trademark is one of the most valuable assets of our Bank.*
- 6.6.1.2** *We know the rules and practices regarding the use of trademark and all other brands of our Bank and as a general rule, we do not use our Bank's name, logo or trademark for purposes instead of our business.*
- 6.6.1.3** *We do not cause a loss of reputation of our Bank and trademark with our works and conducts.*

6.6.2 Printed and Visual Media

- 6.6.2.1** *We respond to the information and interview requests from printed media, TV and other media organizations regarding our position at the Bank and our Bank only after receiving the approval of the Bank's authorized persons or the Corporate Communication Department.*
- 6.6.2.2** *We respond to those requests about social / personal life and not about our position, without using the name of our Bank.*

6.6.3 Internet and Social Media

- 6.6.3.1** *When using the Internet and social media we don't forget that we represent "The Bank" and we do not have any connections that is humiliating our Bank and disturbing its reputation.*
- 6.6.3.2** *We do not give harm to respectability of the bank and other financial institutions in media and social media environments, in our profile accounts or sharings with our identity or by hiding our identity or by using deceptive identities; we do not vilify other financial corporations and we do not act in conducts derogating and humiliating business partners, shareholders, employees and customers.*
- 6.6.3.3** *We avoid sharing any printed or visual content that discloses secrets about our Bank, customers or work.*
- 6.6.3.4** *We act in accordance with arrangements like copyrights and fair use, and we do not share any printed or visual content that contradicts with the laws and regulations or includes crime elements.*
- 6.6.3.5** *In our personal publications (articles, internet blogs, books, etc.) including those that are made in the internet environment; we do not use our Bank's name, trademark or logo, we do not include the data originating from our Bank, and we do not make any comments based on such data.*
- 6.6.3.6** *We inform the relevant departments of our Bank and we do not make any ex-officio announcements from our Bank regarding questions, negative or wrong comments, or information released in the social media.*

6.6.4 Non-Bank Organizations and Persons

- 6.6.4.1** *We do not declare any opinion in the name of our Bank and we do not share the confidential information of our Bank without the information and approval of the authorized unit at organizations such as conferences, panels, seminars, etc. which we participate in due to our position at the Bank or as part of our training by the Bank.*
- 6.6.4.2** *At organizations such as training, courses, conferences, seminars, panels, etc. which we participate in off-hours we do not share the confidential information of our Bank, and we do not let our personal views or opinions we declare during our interviews and speeches be perceived as if they belong to our Bank.*

6.7 Competitor and Competition Relations

- 6.7.1** *We do not express any positive or negative opinions about other banks and their services during the performance of our work, and we avoid such positive or negative statements, comments and messages in every kind of environments, including social media and the internet.*
- 6.7.2** *We know that it is unacceptable to intervene with the free market mechanism and with the prices of the products and instruments in these markets, or to have any attempts to disrupt the competitive environment in these markets:*

- *Excluding the limits allowed by the legislations, under no circumstances, we do not enter in agreements with competitors or other person or other establishments – aiming for direct or indirect anticompetitive, disruptive or restrictive purposes or furthermore in agreements currently posing or will pose such effects.*
- *In circumstances such as being in a domineer position single or together with other enterprises in a specific market, we do not abuse such domineer position.*
- *We do not meet and / or exchange information with competitors for jointly determining market and / or competition terms.*
- *During attendances to the association, committee, chamber, professional body etc. meetings along with other private and professional meetings representing the Bank, We avoid any kind of negotiations / meetings and operations which may cause above stated circumstances or may be described as such.*

6.7.3 *In our duties and works, we act in accordance with preserving the confidence to the banking industry and development of the industry and our country's economy, and we avoid actions that may lead to unfair competition.*

6.7.4 *In our publicity and advertisement activities, we conform to legal regulations and public moral, we act honestly and realistically and do not use statements and expressions that disparage other banks or their services or products, and we avoid all actions that will damage the reputation and standing of the banking profession.*

6.7.5 *We exchange accurate, complete and intelligible data with professional organizations within the framework of regulations and the Bank's own principles on condition that not violating any customer or banking secrets.*

6.7.6 *We avoid all types of applications that may lead to unfair competition in recruitment.*

6.8 Protection of Bank's Assets

6.8.1 Customer Information

6.8.1.1 *We do not use the customer information which we have due to our capacity as a bank for wrong purposes.*

6.8.1.2 *We know our responsibilities in maintaining the privacy of customer information, we ensure the security of these information, and we share them only with legally authorized persons and organizations.*

6.8.1.3 *We do not take the data containing customer information outside the Bank by transferring them to our personal e-mail address or by various means like copying them to USB, CD etc.*

6.8.1.4 *We do not leave the documents containing critical personal information of the customers (password, card number, mobile phone number, mother's maiden name, etc.) in unsafe environments or we do not send them via internet, e-mail or any other unsecure means, even to the customers themselves.*

6.8.1.5 *We do not carry the personal and financial information belonging to customers out of the Bank for any reason whatsoever.*

6.8.2 Data Belonging to the Bank

6.8.2.1 *We do not leave the information which we learned and which we have due to our profession in unsafe environments, and we do not share them with unauthorized persons inside or outside the Bank in writing, verbally or via electronic devices or instruments for whatsoever purposes.*

6.8.2.2 *We know that the projects, technical infrastructure, regulations, etc. which we have developed based on our capacity are owned by the Bank, and we do not take these and such works outside the Bank by whatsoever means during our employment or after our employment is terminated.*

6.8.2.3 We do not cause any situations that may lead to any speculation or negative assessment regarding our capacity.

6.8.2.4 We do not carry the information, documents or correspondences having the quality of bank secrets or commercial secret out of the Bank for any reason whatsoever; and do not disclose the same to third persons other than those legally authorized.

6.8.2.5 We do not give documents such as display images, forms, contracts, etc. related to our Bank's applications to any person other than our customers or other employees of our Bank.

6.8.3 Information of Stakeholders

6.8.3.1 We give importance to the privacy of the personal and work information of our employees, and we take due measures to prevent access to such information by unauthorized persons.

6.8.3.2 We do not share our personal rights with internal or external persons.

6.8.3.3 We know that the information on our suppliers, project and business partners, and other shareholders are private and confidential, and we do not share such information with unauthorized persons.

6.8.4 Protection from Risks

6.8.4.1 We know that one of the foremost constituents of the banking industry is the efficient risk management. We assess the possible results of our transactions and the risks we have undertaken, and we take care our activities to be in compliance with our Bank's general risk policies and risk management principles.

6.8.4.2 We know that establishing and managing an efficient internal control system for the management of risks is among our prior responsibilities, and we perform the control activities under our responsibility efficiently, without causing any weakness in the control.

6.8.4.3 When supervision, compliance and control staff of the Bank or external auditors work in our branch, region, unit or section, we support them to fulfill their job healthfully and we act in full cooperation with them.

6.8.5 Other Bank Assets

6.8.5.1 We direct the requests from our potential or existing customers to our Bank, and we ensure that our Bank benefits from business opportunities that are legal, appropriate to our policies and that will provide added value to our Bank.

6.8.5.2 We use all resources, instruments, and fixtures of our Bank that are relevant to our job efficiently, productively and economically, and knowing that they are solely for the purposes of our work, and we do not use them for our private needs.

6.8.5.3 We observe the benefit of our Bank during our use of the computers, software and hardware, we do not download licensed or unlicensed programs to our computers, and we do not use or copy the Programs beyond our authority.

6.8.5.4 We know that the passwords used in our Bank's applications are confidential and top secret data, we do not share them with anybody, including our colleagues, and we do not keep them in writing as this poses the risk of their being obtained by others.

6.8.5.5 We use internet access, electronic mail addresses, and electronic communication applications such as Skype, which have been assigned for our use solely, for professional purposes, within the framework of Bank Information Security Policies. We know that the Bank may monitor and record use of its equipment and services, we do not have any expectation of personal privacy when using the Bank's equipment and services.

6.9 Personal Financing Standards

6.9.1 Borrowing

- 6.9.1.1 *We act in conscientiousness of being a Banker in our Banking transactions and other financial transactions.*
- 6.9.1.2 *We take care to keep our expenditures in proportion with our income, and we do not borrow beyond reasonable sums.*
- 6.9.1.3 *We do not enter into borrower/lender and warranty relationships with our customers, suppliers or other stakeholders.*

6.9.2 Banking Transactions

- 6.9.2.1 *We take care not to delay providing work or services for our customers while doing our personal banking transactions.*
- 6.9.2.2 *We direct our own cash transactions such as collection or payment, or those of our relatives, to other Bank employees.*
- 6.9.2.3 *We do not enter into or conclude transactions on products and services in which we act as decision-maker in terms of their pricing and approval in our own favor or in favor of our first degree relatives, and we do not allow the application of a different pricing for such products and services.*

6.9.3 Investments and Information Abuse (Insider Trading)

- 6.9.3.1 *We take care that our investments to be medium and long term, and we avoid speculative or high-risk investments more in particular.*
- 6.9.3.2 *We know that the use of the information, that has not been disclosed to the public yet and may affect the value of capital market instruments, for the purpose of gaining benefit for ourselves or for the third parties, and deterioration of equality of opportunity (information abuse) by this way, is contrary to legislative regulations.*
- 6.9.3.3 *While investing on the shares and investment instruments of our Bank, customers, suppliers or the parties whose financial figures we know because of our position, we pay special attention to information abuse issue and we act legally and in accordance with the rules determined by our Bank.*

6.9.4 Premiums

- 6.9.4.1 *We obey exactly to the rules and the principles of the premium campaigns of our Bank to increase sales, we know that the manipulative transactions such as, defining a product without any request from the customer, including the customers to a campaign, who are not covered with the campaign, are contrary to our ethical principles and we act with this conscious.*

6.9.5 Work Related Expenses

- 6.9.5.1 *We always observe the benefit of the Bank in all sorts of expenses and costs related to the Bank and we adhere to the principles of cost-benefit and savings.*
- 6.9.5.2 *We declare the costs and expenses, which we make due to different assignments accurate and timely in accordance with the principles of our Bank.*
- 6.9.5.3 *We use the representation expenses in the framework of determined principles.*

6.10 Conflict of Interest

Conflict of interest can be defined as the conflict between the personal interest of the employee and the interest of the bank when employees take on a task or take a role in the relations of the employees' relatives or related persons, companies and organizations, with the Bank, or can be defined as the formation of a perception in this direction. Based on this definition, we adhere to the designated basic principles listed as below; The possibility of being perceived as a conflict of interest by others, and in case of the emergence, whether it will make a difficult situation both for us as personal and for our Bank.

- *Non-business activities,*
- *Business relationships with parties,*
- *Personal business relationships,*
- *The charities, solidarity and contributions,*
- *Accepting gifts,*
- *Political activities & financial contributions.*

However, we are aware that, the situations that may lead a conflict of interest or be perceived in that way are not limited with these ones.

Therefore, in every transaction and behaviour of us we assess;

- *The possibility of being perceived as a conflict of interest by others, and in case of the emergence, whether it will make a difficult situation both for us as personal and for our Bank,*
- *Whether it will or not affect our impartiality, even if it not, whether it may be perceived as that way,*
- *Whether it will or not adversely affect our Bank and our stakeholders,*
- *Whether it will or not adversely affect our duties and responsibilities.*

6.10.1 Non-Business Activities

6.10.1.1 *We do not take part in any commercial and industrial activities, and we devote all our work to the Bank.*

6.10.1.2 *We know that, getting a task in the Bank's group companies or any non-bank company, is possible only with the Bank's permission.*

6.10.1.3 *While representing our Bank, we do not enter into a competition against the Bank by evaluating an emerging institutional opportunity for our benefit.*

6.10.2 Business Relations with Parties

6.10.2.1 *We only join the events only if the Bank pays the expenses or by paying ourselves for our personal expenses and documenting it, if the workshops, conferences, panels, trainings, seminars, fairs or an invitation and organization under a similar name and scope which are organized by or sponsored by the goods and service provider companies or institutions, even offered to pay all or a part of the expenses of participation, travel and accommodation by these companies. We also inform about the participation fees at the permissions to be received for such visits to abroad.*

6.10.2.2 *We avoid behaviors that are out of normal customer relations with the person or organization who has a business relationship with the Bank, such as exchange of goods for profit and services or providing employment for the relatives etc.*

6.10.2.3 *We take due measures in order not to affect the purchase decisions of any supplier or customer from our Bank. We prevent the actual and perceived conflicts of interest, knowing that the purchase decision is a sensitive process.*

6.10.2.4 *We do not enter into partnerships with customers which could mean conflict of interest.*

6.10.2.5 *We consider the regulations in force, for the gifts of kindness, given to the public employees and authorities, and if we hesitate, we know that we can consult with the Compliance Department or the Legal Advisory Department before giving the gift.*

6.10.2.6 *While fulfilling our duty, we certainly do not accept the proposals which offers benefits for ourselves or our relatives and we notify the Bank's internal authority and managers about the situation.*

6.10.3 Personal Business Relationships

6.10.3.1 *We prefer to receive the personal financial services for ourselves and for our relatives from our Bank without requesting any favor or privileged practice.*

6.10.3.2 *Absolutely we do not open a joint account with our customers except for first degree relatives (spouse, child, mother, father and siblings).*

6.10.3.3 *If the business process (eg. employment, etc.), in which we have a decision making position, may result in providing benefits to our relatives, we do not take part in the process to be applied to these people. If we are authorized to loan, we know that we are banned from the evaluation and decision process of credit transactions for ourselves, spouse and the children under our custody, in accordance with the Banking Law Article 51 and for the parties of the other real and legal persons that form a risk group, according to the Banking Law Article 49 and we know that we will notify the Ethics Line in case of any possibility of this issue.*

6.10.4 The Charities, Solidarity and Contributions

6.10.4.1 *We may have duties in professional associations such as Chamber of Commerce, Stock Exchange, or in non-profit associations, foundations, cooperatives, etc. But during these duties, we do not use the Bank's name, facilities and our duties in the Bank in any way.*

6.10.4.2 *Even on behalf of various associations or organizations, certainly we do not request donations or the like from the customers or other employees.*

6.10.4.3 *We know that, permission of the competent authorities, is required for charity and donations to be made on behalf of the Bank.*

6.10.4.4 *We take care that our personal donations for charity organizations will be secret, voluntarily, and in a manner which they cannot be associated with our business.*

6.10.5 Accepting Gifts and Hospitality

6.10.5.1 *As part of our professional activities, we do not accept or request a gift, payment, commission or other personal benefit from our Bank's customers, its suppliers and potential customers or suppliers wishing to establish relationships with the Bank or from the ones performing on behalf of them.*

6.10.5.2 *However, having all the following conditions, the promotional, hospitality based or small gifts traditionally given in commercial activities can be accepted.*

○ *We know that the value of the gift must be reasonable. Gifts having the value of not exceeding 400 TL or equivalent value in foreign currencies can be considered as reasonable. In calculating the value, we consider all the gifts received from the same supplier or customer within the period of the last 6 months.*

○ *We are conscious of requirement for appropriateness to conditions and social traditions of a gift. We do not accept the gifts which could create an impression that intends to influence the decisions that we are responsible to make due to its timing or other reasons,*

6.10.5.3 *Under no circumstances and without considering the value limit, do we accept cash or cash-like gifts (gift cards, coupons, precious metals such as gold, diamonds, etc.).*

6.10.5.4 *In situations contrary to the Clause No 6.10.5.2 where our will of not accepting the gift is certainly not accepted by the other party and when the risk of harming business relationship occurs due to this, if gifts with high tangible value are accepted, by informing our top manager, we notify the situation, by specifying the nature and characteristics of the gift, through the Ethics Line, and we act according to the instructions.*

6.10.5.5 *We observe those accepted gifts not to create any impression of providing privilege or any exclusivity for the giver of the gift or that this situation does not damage the image of our Bank.*

7. CONDUCT IN SOCIETY

In our Bank, we work with the aim of a better future for people. By our activities, it's our responsibility to contribute to the progress and the sustainable development of the society.

7.1 Anti-money Laundering and Prevention of Financing Terrorist Activities

- 7.1.1 In accordance with our Policy for the Prevention of Laundering of the Criminal Proceeds and Terrorism Financing, we are aware of our statutory obligations and our social responsibility in fighting against money laundering, financing of terrorism and other crimes.*
- 7.1.2 We do not compromise our responsibilities due to any customer relationships, and we act in accordance with the procedures designated in our Bank's Policy.*

7.2 Embargoes and Sanctions

- 7.2.1 For limiting the activities with specific countries, organizations and persons, and for the purpose of ensuring the compliance with the economic sanctions and embargoes imposed by the international community and certain legislative bodies, we follow our Bank's procedures and practices.*
- 7.2.2 We do not perform any transaction that is not in compliance with these regulations or that contradicts our policy if applied.*

7.3 Fighting Against Bribery and Corruption

According to Article No 252 of the Turkish Criminal Law, bribery is a public official's act to make a benefit to be gained by a public official or by another person that he/she will designate, either directly or through intermediaries, in order to do or not to do a business related to his performance. Corruption, on the other hand, is the abuse of the authority, owned due to the position, for gaining either direct or indirect profit. Based on these definitions;

- 7.3.1 In our relationship with the relevant institutions, we clearly state that all kinds of bribery and corruption are unacceptable for our Bank.*
- 7.3.2 We know that the purpose of fighting against bribery and corruption is ensuring the compliance with applicable anti-bribery and anti-corruption laws and secondary regulations in all countries where our Bank operates, ethical and professional principles and universal rules, and we care about the compliance.*
- 7.3.3 We know that fighting against bribery and corruption covers all Bank employees, including the Board of Directors; subsidiaries, affiliates and their employees; the firms and their employees that we receive external services, including the support services regulated by legislation; persons and organizations acting on behalf of the Bank including suppliers, consultants, lawyers and external auditors.*

7.4 Our Commitments Regarding the Environment

- 7.4.1 We carry out studies to ensure the efficient use of natural resources and that the waste generated by our processes to be reduced to the minimum possible level.*
- 7.4.2 We comply exactly with environmental laws and regulations. We encourage the development of awareness about this issue among our stakeholders. We demand the necessary measures to be taken, in this regard, from the businesses we work with.*
- 7.4.3 We carry out studies in order to support recycling and reusing activities for our employees and other stakeholders and to raise awareness on this issue.*
- 7.4.4 When selecting the services and the expertise to be received from suppliers, we prefer suppliers who utilize from activity / production systems more environment-friendly and socially beneficial.*

7.5 Obligations Related to Tax and Social Security Systems

- 7.5.1** *We carry out our professional activities in such a way as to ensure that our Bank fulfills its tax obligations appropriately. We do not allow activities that may lead to illegal evasion of taxes or that may affect public funding in a negative way.*
- 7.5.2** *We carry out our professional activities in such a way as to ensure that our Bank fulfills its obligations related to the social security system in an appropriate manner.*

7.6 Contribution to Society

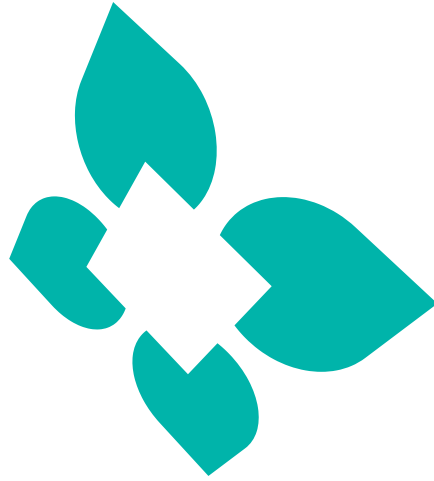
- 7.6.1** *In the context of our Corporate Social Responsibility Policy, we offer quality and diversified products and services that meet the expectations of our stakeholders, support economic growth and social development, and we contribute to the sustainable development of our country through non-profit-oriented social investments.*

7.7 Political Neutrality Policy

- 7.7.** *As a bank, we conduct our business activities in accordance with the principle of political neutrality.*
- 7.7.2** *Our Bank does not provide assistance to political campaigns or donate to the political parties.*
- 7.7.3** *As bank employees, we are not actively involved in any political parties and their extensional organizations, and we avoid any behavior that might imply financial support to them.*
- 7.7.4** *In case we use our legal right to participate in political parties, we know that we must do it on an individual level without using our Bank's resources, doing it out of working hours, avoiding making reference to our Bank and without any overshadowing of professional neutrality and the political neutrality of our Bank.*

8. APPLICATION OF THE CODE

- 8.1** *We know that the understanding, adoption and implementation issues of our Code of Conduct Policy is pursued by Member / Members of the Board of Directors responsible for Ethics, under the control of Compensation and Corporate Governance Committee.*
- 8.2** *It is within the knowledge of us that the cooperation with relevant units for monitoring the effectiveness and implementation of our Code of Conduct Policy, management of the Ethics Line and to placing ethics culture in our Bank is carried out under responsibility of the Compliance Department.*
- 8.3** *As employees, we are aware that we have to internalize these ethical principles and rules in our individual behaviors, to encourage their implementation throughout our Bank, to contribute to the creation of compliance culture, to avoid behaviours contrary to ethical principles and rules, and to notify our superior, Compliance Department or Ethics Line if we are aware of any situation contrary to them.*
- 8.4** *We know that participating in the training of compliance and ethics principles in orientation programs, and awareness trainings in this issue provided annually either in electronic environment or face-to-face are compulsory.*
- 8.5** *We know that we are obliged to declare that we will act in accordance with the principles and rules set forth in our Code of Conduct Policy at the recruitment and during the time we are working if demanded.*
- 8.6** *We know that our Code of Conduct Policy is part of the employment contract of Türkiye Finans Participation Bank Inc.*
- 8.7** *We know that unimplementation of requirements in our Code of Conduct Policy, Labor Law and / or other policies and procedures within the Bank may result in disciplinary actions that may result in the termination of our employment contract.*



turkiyefinans.com.tr / 0850 222 22 44

