

AKBANK T.A.Ş.

ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

1. VISION:

This Anti-corruption and Anti-bribery Policy basically and primarily aims to ensure compliance with the national applicable laws and regulations, as well as the pertinent international legislative instruments referred to in the body of this document, and the basic regulations, principles, recommendations and criteria published by the relevant international organizations as codes or examples of good practices.

2. PURPOSE

The purpose of this Anti-corruption and Anti-bribery Policy is to assure compliance with the anti-bribery and anti-corruption laws and regulations, and clean banking rules, ethical principles and universal guidelines valid in all countries where our Bank has its business operations, and assure compliance with legal obligations pertaining to prevention of financial crimes, and assess and review our customers, transactions, products and services by a risk-based approach, and determine our strategies, controls, measures and actions, modus operandi and responsibilities related to minimization of probable risks, and increase awareness of all our employees on these issues.

This policy further intends to prevent depositing of criminal revenues originating from bribe and corruption crimes in our Bank for laundering purposes, and to ensure identification and elimination of a working environment which may lead to commission of bribe and corruption crimes among our Bank's employees, customers and business partners as far as possible, and to make sure that all our obligations, liabilities and commitments regarding bribe and corruption crimes are duly performed and fulfilled.

3. DEFINITIONS

Corruption: Refers to abuse of existing resources and authorizations in any entity or organization directly or indirectly for deriving improper personal benefits and interests.

Bribe: Refers to an act of deriving an improper personal benefit in favor of oneself through an agreement entered into with a third party requiring the bribed person to

breach the requirements of his job duties by way of doing or refraining from doing or speeding up or slowing down a job-related act or decision. Bribery and corruption acts may be done by many different ways or means, including, but not limited to:

- Cash payments, or
- Donations to political parties or charity organizations, or
- Commissions received, or
- Social rights or fringe benefits granted unequally and in contradiction with internal regulations, or
- Gifts, or
- Entertainment activities, or
- Other benefits and interests.

Compliance Unit: Refers to a unit comprised of employees in charge of conduct of compliance program and reporting to the Compliance Officer. It is named as Internal Control and Compliance Department / Vice President – Compliance in our Bank’s organization.

Anti-corruption and Anti-bribery Desk: Refers to a sub-unit affiliated to the Compliance Unit, founded for prevention of probable risks and for performance of the duty of management of a control mechanism against abuse of existing resources and authorizations directly or indirectly for personal benefits and interests within our Bank and its business partnerships.

Third Party: Refers to and stands for shareholders, subsidiaries, group companies, existing or potential business partners, suppliers, vendors, or other natural persons or legal entities engaged in outsourced support services.

4. SCOPE

This policy covers and is applicable on Directors, General Manager, Senior Managers and all employees and officers of our Bank; and our Bank’s affiliates and subsidiaries and their employees; and providers of outsourced services to our Bank, also including the support services regulated by the applicable laws, and their employees; and all and

any persons or entities working for or on behalf of our Bank, also including our suppliers, vendors, advisors, lawyers and external auditors; as well as our customers.

5. FOCAL AREAS OF CORRUPTION AND BRIBERY ACTS:

Under this policy, with a view to complying with this policy and handling their work flows in compliance herewith, all business units should take the required actions in their basic focal areas as listed below:

- Acceptance and presentation of gifts, and
- Representation and entertainment activities, and
- Facilitating payments, and
- Donation and grant payments (Political contributions and donations to charity organizations), and
- Abuse of authority, and
- Relations with third parties and business partners, and
- Relations with legal authorities, and
- Sponsorship relations.

Acceptance and presentation of gifts: Gifts are products and services given to persons being a party to existing business relations or having potential business expectations, solely as a matter of commercial courtesy or as an expression of thanksgiving feelings, with no material or moral consideration. Procedures and principles regarding the processes of acceptance and presentation of gifts should be implemented as detailed in the Gift and Entertainment Policy prepared and issued by the Human Resources Management Department.

Representation and entertainment activities: Stand for invitations, entertainments, dinners, corporate communication organizations and training activities organized for representation and entertainment purposes for and among persons being a party to existing business relations or potential business expectations. Procedures and principles regarding the processes of representation and entertainment are detailed in the Gift and Entertainment Policy prepared and issued by the Human Resources Management Department.

Facilitating payments: Refers to unofficial, improper and trivial payments of small amounts paid to a lower echelon (junior) officer in order to assure, secure or speed up a routine or required act of such officer which has indeed already been legally entitled by the person making the facilitating payment. Such types of improper payments are tracked through notices sent to the Ethical Line.

Donation and grant payments: May be listed as political contributions and donations to charity organizations. Political contributions or activities in the name or on behalf of our Bank are strictly forbidden. As for the donations to charity organizations, compliance with the principles set forth in our Bank's Ethical Principles Policy is obligatory. Processes regarding donation and grant payments are tracked in line with the results of investigations conducted upon notices reported to the ethical line and comments and ideas demanded by the relevant business unit.

Abuse of authority: Means use of job-related authorities for personal interests and benefits in the decision-making process. Such improper acts are tracked through notices reported to the Ethical Line.

Relations with third parties and business partners: Shareholders, subsidiaries, group companies, existing or potential business partners, suppliers, vendors, or other natural persons or legal entities engaged in outsourced support services are accepted and treated as third parties for the purposes of this policy. Relations and activities of our Bank with third parties are tracked in line with the results of investigations conducted upon notices reported to the ethical line and comments and ideas demanded by the relevant business unit.

Relations with legal authorities: Gifts and entertainments that may directly or indirectly be provided to officers of foreign or local legal authorities and official bodies with whom our Bank communicates or interacts due to legal requirements shall be kept limited and restricted only by symbolic and trivial gifts as stipulated in our Bank's Gift and Entertainment Policy. Procedures and principles regarding the processes of acceptance and presentation of gifts and the processes of representation and entertainment should be implemented as detailed in the Gift and Entertainment Policy prepared and issued by the Human Resources Management Department.

Sponsorship relations: These relations may be related to sports, arts, culture, education, entrepreneurship and science fields or in the form of giving support to an activity or organization. Processes regarding sponsorship of our Bank are tracked in

line with the results of investigations conducted upon notices reported to the ethical line and comments and ideas demanded by the relevant business unit.

Accepting or giving bribes for any purpose or motive whatsoever is by no means acceptable. These principles are sought for and enforceable on not only third parties receiving or giving services, but also our Bank's business partners. All activities and relations with all third parties, being stakeholders of our Bank, other than its employees should be conducted fairly, transparently, incorruptibly and in strict compliance with the applicable laws and ethical rules. To directly or indirectly make improper payments to or accept improper payments from both internal and external third parties, legal authorities, business partners and other parties having business relations with our Bank, and to abuse job-related duties and authorities are strictly forbidden.

6. POINTS TO CONSIDER AS A PART OF ANTI-CORRUPTION AND ANTI-BRIBERY ACTIVITIES:

6.1 Keeping Correct Records

All authenticating and certifying documents issued within the focal areas should be appropriately presented, and all records should be kept completely, accurately and reliably, and all such relevant records should be made available and ready in audits and inspections conducted by official authorities and governmental bodies.

6.2 Reporting and Data Protection

An employee acting for and on behalf of the Bank should, whenever he has a suspicion of corruption in the Bank or in a party having relations with the Bank, or is offered a bribe, or is requested to bribe, or is otherwise involved in any illegal or unlawful activity, report the same to the Ethical Line.

6.3 Policy Breaches

In case of a breach of this policy, sanctions are imposed and applied in accordance with the terms and conditions of our Bank's Disciplinary Regulation as a result of inspections conducted by the Anti-corruption and Anti-bribery Desk and the Chair of the Committee of Inspectors.

If and when any policy breach is verified also about the service providers or business partnerships of our Bank, the Chair of the Committee of Inspectors is informed thereabout, and as a result of inspections conducted by the Chair of the Committee of Inspectors, our Bank's business relations with aforesaid service providers or business partnerships are terminated.

6.4 Training Activities

Trainings are an important tool for increase of awareness of our employees. Training activities cover and are performed for all employees of our Bank.

7. MONITORING AND CONTROL ACTIVITIES:

All risky matters and incidents should continuously and permanently be kept under supervision by the Anti-corruption and Anti-bribery Desk and the Chair of the Committee of Inspectors of our Bank.