

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY OF İŞBANK

I. OBJECT AND SCOPE

This Policy aims to enable the compliance of the Bank's employees and all business partners that act in the name of or provide services to the Bank with the effective anti-bribery and anti-corruption regulations.

II. DEFINITIONS

Corruption refers to demanding, offering, giving or receiving any kind of unjust gain or unlawful benefit by any stakeholder that obstructs the fulfillment of his responsibilities in compliance with the law.

Bribery refers to obtaining of benefits by a person either directly or through intermediaries in order to do or not to do an act in relation to the performance of his duties.

III. FOUNDING PRINCIPLES

1. No payments shall be made, no gifts shall be provided and no personal payment, aid or grant shall be given to any state officer, political party or candidates or to any other person in order to influence a decision that is related to the continuation of the Bank's activities or that may be beneficial for the institution.
2. The Bank may not use the opportunities and facilities it owns to support a political candidate or institution.
3. The gifts given by the Bank shall not aim at influencing the parties related to a tender or agreement, of which the Bank is a party.
4. The Bank does not tolerate offering of any facilitation payments by its employees in their relations with the third parties.
5. The grants and sponsorships of the Bank must be in compliance with the effective legislation and internal regulations of the Bank.
6. The employees of the Bank shall not demand or accept any gifts from third parties in violation of the provisions of the Gifts and Hospitality Policy and may not engage in any behaviors that might be interpreted as such. In case a Bank employee believes that his life or liberty is in danger due to an unlawful payment demand, he must receive or make such payment and immediately report this situation to his supervisor.
7. The employees of the Bank shall not use their duties and authorities for the benefit of themselves, their families or third parties in order to obtain personal or private gains.

8. The employees, who receive or are promised to receive any kind of benefit under any name or title either directly or via an intermediary for themselves, their families or third parties by consciously or intentionally misusing their title or duties through mutual agreement, inducement or by force, shall be subject to disciplinary action and the issue shall be notified to the judicial bodies if seen necessary by law.
9. The Bank is attentive not to build any relationships with persons or institutions that have been reported to be engaged in bribery or corruption, in its relations with the persons and/or institutions providing services to the Bank with the capacity of proxy and with its business partners, from which it receives services. In case a relationship of this form has been built, this relationship shall be immediately concluded if the engagement in bribery or corruption is proven with a judicial decision.
10. The persons, suppliers or contractors acting in the name of the Bank with the capacity of proxy must comply with the legislation and all the effective anti-corruption laws.
11. The Bank regularly provides trainings to its employees on the Anti-Bribery and Anti-Corruption Policy. The employees shall sign a document declaring that they would comply with the provisions of the Anti-Bribery and Anti-Corruption Policy and accept the results of any violating actions.

IV. EFFECTIVENESS

This policy, which acts as an integral part of İşbank Sustainability Policy, has been approved by the Board of Directors and gone into effect on the date of 31.12.2014.