

GIFTS AND HOSPITALITY POLICY OF İŞBANK

I. OBJECT AND SCOPE

It is natural and acceptable that the employees of the Bank build social relationships with their customers. However, it is necessary that these relationships do not result in any conflicts of interest. This policy sets forth the legitimate framework of the gifts given or received and the hospitality activities organized in order to strengthen business relationships.

II. DEFINITIONS

Gift refers to products that are given by and among the persons, who are engaged in business relationships in general, without necessitating a material or immaterial return and with the aim of commercial courtesy or thanks.

Conflict of interest refers to any kind of economic or personal interests that are against the interests of the Bank or that might be against the interests of the Bank in scope of changing conditions, and that may influence the decisions of employees or performance of their duties. This kind of a situation must be immediately reported to the supervisor of the employee and the supervisor must immediately take the necessary measures to eliminate such conflict of interest. In some situations, the actions of the employee that may negatively affect the employer may aim at obtaining benefits not for himself, but for a relative or third parties.

III. FOUNDING PRINCIPLES

1. Even where it complies with the law, the employees shall not give or receive gifts for business purposes in violation of the Bank's policy concerning Anti-Bribery and Anti-Corruption.
2. The employees of the Bank shall not accept any gifts from their customers or suppliers, from which their department purchases goods or services, and shall not make any offers to request any gifts.
3. Provided that they are not requested personally by the employee, gifts and promotions that have a nominal value rather than monetary value and are given periodically such as organizers, pens or calendars may be accepted.
4. In exceptional situations, where the will of our employees for not accepting the gift is not recognized by the other party and this poses a risk of damaging the business relationship, gifts that are not of high monetary value may be accepted.
5. The gifts, which are not of high monetary value, shall be recorded at the related Branch/Department by specifying information such as the date of acceptance, type and value of the gift and the customer who has given the gift. On the other hand, there is no need to record the promotional items or gifts that have a nominal value rather than a monetary value.

6. Gifts in cash, precious mines such as gold and diamonds or gifts that are easily convertible to cash shall not be accepted for any reason.
7. Consideration is given in order to avoid any impressions that the gifts accepted cause the person giving the gift to receive a preferential treatment or any privilege, and to avoid this kind of a situation to harm the image of our Bank.
8. The aforementioned provisions shall also apply to gifts given to family members in scope of the relationships of our employees that are built as a result of their duty.
9. The employees of the Bank may participate in entertainment and dinner organizations with the aim of representation and hospitality, provided that these are acceptable, reasonable and modest in the business world. When the employees of the Bank organize entertainments or dinners with the aim of representation and hospitality, the Representation and Hospitality Authorities provided by the Bank shall be used.
10. In case the Bank or any Party acting on behalf of the Bank is hosting the organization, the travel and accommodation expenses of the guests shall be borne by the guests and the travel and accommodation expenses of the Bank's employees to be made for business purposes shall be borne by the Bank. In necessary, reasonable or explicable situations (such as training activities, corporate communication organizations, etc), the costs may be paid by the Bank or the party sending the invitation.
11. Managers may accept gifts that are not of high monetary value from their direct or indirect reports, provided that they do not induce such gifts.

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.