

I. OBJECT AND SCOPE

It is natural and acceptable that the employees of İşbank (the Bank) build social relationships with their customers.

However, it is essential 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, that may influence the employee during his/her decision making process or while fulfilling his/her duty. 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 Anti-Bribery and Anti-Corruption Policy and Ethical Principles and Code of Conduct.
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 from third parties with whom the Bank has a business relationship including İşbank Group companies, and shall not make any offers to request any gifts.
3. Precious mines such as gold and diamond, cash and products that are easily convertible to cash, gifts like discount/gift voucher and vacation shall not be accepted for any reason.
4. Provided that they are not requested personally by the employee, promotional or souvenir gifts that are given periodically such as organizers, pens or calendars and that are not of a high monetary value may be accepted.
5. In exceptional situations, where the will of the 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 in line with commercial practices and that are not of high monetary value may be accepted.
6. 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 symbolic value rather than a monetary value.
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 the Bank.
8. The aforementioned provisions shall also apply to gifts given to family members in scope of the relationships of the 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 in the business world, reasonable and modest. When the employees of the Bank organize entertainments or dinners with the aim of representation and hospitality, the Representation and Hospitality Provisions 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 covered by the guests and the travel and accommodation expenses of the Bank's employees to be made for business purposes shall be met by the Bank. In necessary, reasonable or explicable situations (training activities, corporate communication organizations, etc.), the costs may be paid by the Bank or the party sending the invitation.
11. Acceptance of gifts that are not of high monetary value by the managers from the employees who directly or indirectly report to them or by employees from their managers is only possible provided that they do not induce such gifts and the purpose is celebration on special occasions.

12. For the behaviors which are identified as violation of the principles of this policy, required disciplinary sanctions, including termination of the contract of employment, are imposed within the framework of the related provisions and procedures of the Bank Legislation and Collective Bargaining Agreement. The judicial bodies shall be notified if required by law.
13. In case of any doubt as to whether the gift is in compliance with the policy, the opinion of the Human Resources Management Division is sought.

IV. SUPERVISION/AUDIT

This policy is executed by the related Head Office division under the supervision of the Human Resources Committee. Compliance with the provisions of this policy is audited within the context of internal audit. Principles to perform the action plans that are required for the elimination of findings detected during the aforementioned audits are determined by the Human Resources Committee.

V. REVISION

At least once in a year, this policy is reviewed by the Human Resources Committee in accordance with the requirements and changing operating conditions. Required revisions and amendments, which are submitted to the Board of Directors by the Human Resources Committee, go into effect with the approval of the Board.

This policy is available on the corporate website of İşbank.

VI. EFFECTIVENESS

This policy has been approved by the Board of Directors and gone into effect on the date of 31.12.2014.