

## I. OBJECT AND SCOPE

This policy sets forth the responsibilities and principles of İşbank (the Bank) regarding human rights and human resources functions.

## II. DEFINITIONS

Human rights refer to untouchable, indispensable and high-quality ethical values that make a person human and that are entitled by such person by birth, notwithstanding any condition or status.

The principle of equal opportunity requires behaving people in a just and unbiased manner, encouraging diversity in both the workplace and the society, and protecting human dignity. Equal opportunity also aims to eliminate the negative effects of injustices that may have been done in the past, and to pursue a constructive and inclusive path that does not allow for discrimination.

Diversity enables an institution, the persons it works with and its employees to benefit from an inclusive working environment and practices. The principle of diversity is based on the fact that people are different from each other in many ways. Understanding, evaluating and effectively managing these differences provides a more efficient participation, which would provide a significant benefit in attaining success at the individual, team and institutional level.

## III. FOUNDING PRINCIPLES

1. The Bank is attentive to fulfilling the requirements of international agreements, to which our country is a party, particularly the United Nations' Universal Declaration on Human Rights and the basic principles of International Labour Organization especially concerning the rights at work, children's and human rights and social justice.
2. The Bank takes all the decisions about its employees regardless of the differences in race, origin, religion, language, sect or any form of belief, sexual orientation / preference, gender, mental or physical disability, age, cultural or social class, view / opinion differences. It repudiates all forms of discrimination towards or among its employees and managers. It takes the necessary measures to increase the workforce diversity, to improve the equality of opportunity and to reduce all kinds of discrimination.
3. The Bank applies a remuneration system independent from religion, language, race, age, class and gender. In this context, it adopts the principle of equal pay for equal work. It applies a transparent and measurable system in remuneration.
4. The Bank oversees gender equality for all of its activities and aims to create opportunities to raise awareness about the issue. It works to ensure that this approach is adopted by all stakeholders throughout the value chain. In its Gender Equality Policy, the Bank describes the principles it follows to uphold gender equality.
5. The Bank respects the right to unionization and collective bargaining. All employees are free to be members of unions and they act on their free will. The Bank supports the use of the right of engaging in union activities and collective bargaining freely and effectively.
6. Receiving employees' opinions, recommendations and evaluations via open, transparent and sincere communication channels available to all of them is an integral part of the Bank's human resources management approach, which encourages participation and creativity of its employees.
7. The Bank continuously encourages its employees to maintain the open communication environment and report all sorts of workplace issues as well as the potential violations. The Bank also informs all employees beginning from the time of employment about the secure communication channel that is established for this purpose. Issues raised by the employees on the communication line, which is accessible online for all employees through the Bank system, are only seen by a limited number of senior managers who are defined in the system. Every issue submitted by the employees are scrutinized promptly and finalized by a detailed investigation, with utmost care for every aspect. The Bank does not tolerate any activity, intimation or opinion that obstructs this open communication environment or the reporting of potential violations with the feelings of retaliation, revenge or retribution. Employees who make notifications to the communication channel in good faith are never subjected to maltreatment due to their notifications.
8. Employees report through the Bank's Ethics Line regarding activities that do not comply or suspected to be inconsistent with İşbank's Ethical Principles and Code of Conduct, Bank policies, internal regulations, national and international legal regulations. The confidentiality of the notifications is essential, and the identity of the person making the notification is kept confidential unless he/she wants his/her name to be disclosed. Employees are not exposed to sanctions such as disciplinary punishment, being in disadvantaged position compared to their peers

and direct/indirect retaliation just because of their reporting.

9. The Bank shares the fundamental human resources processes such as recruitment, career management, compensation management, performance management and cease of employment with its employees in an open and transparent manner.
10. The Bank, thanks to adopting a high performance culture, supports the occupational and individual development of its employees through trainings and continuous feedback.
11. The Bank regularly organizes training activities in order to develop the competences of its employees and foster their individual development.
12. The Bank, in the framework of the legislation and practices related to occupational health and safety, continuously improves its processes with preventive, corrective and protective approaches by providing its employees with healthy and safe working environment.
13. The Bank, by developing banking practices for the disabled, applies and supports the requirements for removing the barriers in front of them, in order to enable a broader inclusion of its disabled stakeholders in life.
14. Making false statements that may harm the honor and dignity of persons, organizations and institutions or making false, derogatory denouncements or complaints with the aim of discrediting those, or charging with a crime without a concrete basis by the way of attacking the rights of persons or institutions protected by law and/or their credibility are serious disciplinary issues in the Bank and if required by law, judicial and official bodies may be notified.
15. The employees of the Bank refrain from any action that may be considered as mistreatment, discrimination or harassment in the workplace. In these kinds of situations, the employees are obliged to notify this issue via the communication channels including Ethics Line provided to them or by applying to the union.
16. Filing a complaint or denouncing about the employees or managers who are involved in actions which are given in principle no. 15, shall not be used against the person filing the complaint or denouncing; the complaint/ denunciation is seriously evaluated and concluded. Necessary administrative sanctions shall be implemented for all kinds of mistreatment, discrimination, and harassment as well as actions aiming to conceal these types of behavior.
17. The employees, as the real owners of İşbank, are responsible for internalizing and implementing the aforementioned principles in their relations with the Bank, their colleagues and third parties, within the frame of trust and honesty.
18. 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.
19. This policy is enforced under the responsibility of the Deputy Chief Executive who is in charge of human resources function.

#### **IV. SUPERVISION/AUDIT**

This policy is executed under the supervision of the Human Resources Committee within the context of Article 19 in the section "III. Founding Principles". 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 Corporate Governance 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.