



# TÜRKİYE KALKINMA VE YATIRIM BANKASI ANONİM ŞİRKETİ

## ETHICAL PRINCIPLES

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## **1. PURPOSE AND SCOPE**

The preparation of these principles and informing all personnel of Türkiye Kalkınma ve Yatırım Bankası A.Ş. by means of these principles has been deemed appropriate and useful in order to regulate business relations by determining the behaviours and transactions that are contrary to the values of the society and individuals, the law and the internal regulations of Türkiye Kalkınma ve Yatırım Bankası A.Ş. (the Bank) in general terms.

Furthermore, these principles specify in detail the behaviours that the personnel are obliged to comply with, the prohibitions that the personnel must carefully observe in the transactions carried out within the framework of the Bank's activities, and the aspects of the attitudes, behaviours and transactions in their relations with the Bank's customers and stakeholders that are contrary to the Bank's principles. The scope of application of this guideline includes not only the permanent staff of our Bank, but also the employees assigned to our Bank by subcontractors as specified in the Human Resources Regulation. In other words, all personnel working within our Bank are responsible and obliged to comply with the ethical principles.

Behaviours and transactions that are contrary to these principles determined by our Bank will be sanctioned within the scope of the Disciplinary Committee practices according to the nature and severity of the consequences they have caused or will cause.

Our Bank also accepts and implements the "Banking Ethical Principles" published by the Banks Association of Turkey, the Regulation on the Principles of Ethical Behaviour and Application Procedures and Principles of Public Officials and the decisions taken by the Turkish Public Officials Ethics Board.

## **2. OUR RESPONSIBILITIES TO THE COMMUNITY**

1. The mission of our Bank is to help the structural transformation of our country in line with sustainable development priorities by meeting the financing and consultancy needs of investors and to work to contribute to the spread of capital to the base. To add value to employees and all other stakeholders with a dynamic, innovative, environmentally and socially sensitive banking approach. For this purpose, all personnel are obliged to carry out their activities in accordance with the Bank's Sustainability Principles.
2. Due care is taken to reduce the environmental impact of our professional activities and to realise our Bank's sustainability goals.

## **3. OUR RESPONSIBILITIES TO OUR CLIENTS**

1. Client weaknesses may not be exploited, even in favour of the Bank, and profit may not be pursued by giving incomplete or incorrect information to the client.
2. Clients may not engage in personal debt exchange, regardless of the reason.
3. The influence obtained from the Bank-Customer relationship may not be converted into a price advantage or any other benefit within the scope of goods/services to be received from customers in line with personal interests.
4. In case of products or services provided personally from customers, care is taken to ensure that these purchases are at market standards and reasonable in terms of price.
5. No gift, money, cheque, property, free holiday, special discount or any other gift, money, cheque, property, free holiday or special discount that would put the Bank and

the recipient under liability may be accepted from customers, subcontractors and consultants.

6. Even if in favour of the customer, no transaction may be made on behalf of the customer without a written customer instruction in transactions where an instruction is mandatory.
7. In business and relations with customers, the Bank acts as a prudent merchant; no benefits may be obtained to the detriment of the Bank or a customer, or in favour of another customer, and no attempts or behaviours may be made to cause this.
8. Personnel may not directly or indirectly accept any inheritance or will from customers (unless they are close relatives or family members). They cannot undertake the duty of being authorised to represent the customer legally and cannot act as a proxy for the customer.
9. In pricing all products and services offered by the institution, personnel are obliged to comply with internal regulations and legal obligations in this regard.

#### **4. OUR RESPONSIBILITIES TO BANKING AND EACH OTHER 3**

1. Behaviour and discourse that may undermine confidence in the banking sector shall be avoided.
2. Behaviour that may cause unfair competition with other financial institutions shall be avoided.
3. While managing the services provided by the Bank, the Bank's trust cannot be abused and behaviours and transactions that may damage the Bank's employment contract / loyalty obligation cannot be carried out.
4. Since the salary and other fringe benefits and all kinds of payments made by the Bank are personal and inexplicable, the salary and fringe benefits cannot be shared with any personnel or third parties.
5. Without discriminating on the basis of language, religion, philosophical belief, political opinion, race, age, physical disability and gender, and without engaging in behaviours and practices that prevent equality of opportunity, the Bank must act in accordance with the requirements of service in an impartial manner.
6. Care is taken to ensure that the rights of the personnel arising from the provisions of the Labour Law and the provisions of the legislation to which they are subject, especially the prevention of unfair termination of the employment contract, are provided in a timely and complete manner.
7. In both recruitment and career development, care is taken to provide equal opportunities without discriminating between personnel on the basis of gender, language, religion, disability, political opinion or any other reason.
8. A safe and healthy work environment is among the basic responsibilities of the Company. The Bank acts in accordance with legal requirements and relevant internal regulations, particularly the Bank's Quality, Customer Satisfaction, Information Security, Environment, Occupational Health and Safety Policy.
9. Personnel may not inflict psychological violence on each other for any reason whatsoever. In order to be able to talk about the existence of psychological violence in the workplace, it must be continuous, deliberate, include goals such as intimidation, dismissal and cause moral damage to the victim. In case such acts are detected, the sanctions required by the legislation are applied.

## **5. OUR RESPONSIBILITIES TO OUR BANK**

1. The Bank may not engage in private affairs during working hours to the extent and in such a manner as to interfere with the Bank's business.
2. No behaviours or actions may be taken to damage or diminish the Bank's reputation, reliability and image, and no actions may be taken against a third party (including the Bank's customers) which are not based on a justifiable reason and which aim to defame and/or malign the Bank in any way whatsoever.
3. The utmost care is taken in the use of all monetary and non-monetary resources of the Bank. These resources cannot be used for personal use, expenditure, giving gifts, donations and aids. Personnel act in accordance with the Bank's Donation and Aid Policy in this regard.
4. The corporate image cannot be damaged by attributing the bottlenecks that may arise in customer relations to the Bank's policies.

## **6. OUR BUSINESS RELATIONS**

1. Personal financial relations with customers, consultants and persons and organisations (subcontractors) doing business on behalf of the Bank, attempting to gain interest, pursuing interests in the agreements made, means indirect use of the monetary resources of the company.
2. In the event of a conflict of interest or if there is any doubt about whether there is a conflict of interest in any matter, the situation should be shared with a senior manager and the matters specified in our Bank's Conflict of Interest Policy should be followed.
3. Any information obtained in the capacity of being a staff member and the open points of the Bank's system may not be used in a way to provide or attempt to provide benefits to the staff member himself/herself or his/her relatives.
4. The personnel may not take office in another organisation, practice self-employment, engage in trade, operate in a way to create competition in the workplace of another employer, or engage in activities that require being considered a merchant or tradesman according to the Turkish Commercial Code No. 6102.

## **7. OUR RELATIONS WITH THE MEDIA AND EXTERNAL ORGANISATIONS**

1. It is subject to the approval of the General Manager to give a statement to any media organisation, to make an interview, to participate as a speaker in a seminar, a conference, etc. and to determine whether a fee will be received in return. In no way can personal gain be obtained from these activities.
2. The personnel shall not make posts that may damage the image, reputation and reliability of their profession, duty, business and the institution they represent in their use of social media and shall comply with these ethical principles, especially Bank/Customer confidentiality.
3. The personnel shall refrain from behaviours that jeopardise the impartiality of his/her position when making public comments on public policies or participating in public debates about them.
4. The personnel, when using social media, shall avoid any current or potential future interests, conflicts of interest or situations that may create a perception of such interests.
5. The personnel should check the accuracy and timeliness of information within the scope of processing information on social media and should not cause information pollution.

6. The personnel should avoid posts with violent or sexual content and similar disturbing posts in their use of social media.
7. The personnel should consider the benefit of society in their posts.
8. The personnel should avoid all kinds of behaviours and posts that may harm the personal rights of individuals, especially their life, name, honour and dignity, private or family life, professional and economic values.
9. The personnel should not make any kind of intolerant expressions that nurture, defend or advocate any kind of hatred that may lead to discrimination.

In the use of the corporate social media account, the personnel using the account:

1. shall be authorised on behalf of the institution.
2. shall not discriminate on the basis of language, race, ethnic origin, colour, gender, political opinion, philosophical belief, religion, sect, wealth, marital status, health status, disability, age, dress and appearance and similar reasons and shall not delete or block users or their comments.
3. shall not act for personal benefit, political or philosophical opinion or similar purposes.

## **8. CONFIDENTIALITY**

1. Bank personnel are obliged to act in accordance with the legislation and the Bank's policies and procedures regarding the processing of all personal data, including special categories of personal data specified under the Law No. 6698 on the Protection of Personal Data.
2. Personnel keep all kinds of information and documents regarding our customers confidential and keep them carefully, except for the persons and authorities expressly authorised by law to request information and documents.
3. Personnel must treat as confidential any information, invention, invention, business, method, progress, patent, copyright, trademark, trade secret, Bank secret, customer secret or any other innovation, even if not subject to legal protection, and any commercial, financial, technical information to be learnt in writing or verbally,
4. Regardless of the purpose (personal or business-related), no software developed in-house or purchased externally may be used or copied without authorisation or permission.
5. Personnel are personally responsible for working in compliance with the Bank's Information Security Policy.

## **9. LAUNDERING PROCEEDS OF CRIME**

1. It is ensured that the risks that our Bank may be exposed to regarding laundering proceeds of crime and financing of terrorism are mitigated and kept under control by complying with know-your-customer principles and procedures regarding laundering proceeds of crime and financing of terrorism within the scope of the Regulation on Compliance Programme for the Obligations for Prevention of Laundering Proceeds of Crime and Financing of Terrorism and the Bank's Regulation on Combating Laundering Proceeds of Crime and Financing of Terrorism.
2. It is ensured that the personnel's awareness on the fight against laundering proceeds of crime and financing of terrorism is raised and they are informed about legal and administrative obligations.

## **10. ENFORCEMENT**

These Principles shall enter into force on the date of approval by the Bank's Board of Directors.

## **11. EXECUTION**

These Principles are executed by the Board of Directors.