



**KUVEYTTÜRK**

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**KUVEYT TÜRK  
KATILIM BANKASI A.Ş.  
CODE OF ETHICS**

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**KUVEYT TÜRK KATILIM BANKASI A.Ş.**  
**CODE OF ETHICS**

**Related Policies and Regulations**

- 1- Disciplinary Regulations
- 2- Workplace Safety Regulations
- 3- Personnel Regulations
- 4- Related Parties Policy
- 5- Conflict of Interests Policy
- 6- Confidentiality Policy
- 7- Insider Trading Policy
- 8- Corporate Social Responsibility Functioning Policy
- 9- Recruitment Policy

**1. PURPOSE**

Kuveyt Türk Participation Bank is an organization which is faithful to Sound Banking Principles, has ethical values and social responsibility which makes its transactions over CODE OF ETHICS which is established on such ethical values. In parallel with these basic values, both Executive Board and all employees are expected to align with the established ethical principles.

Kuveyt Türk does not tolerate any acts which do not align with the CODE OF ETHICS. Kuveyt Türk does not tolerate illegal behaviours and offenses; and it does not tolerate practices such as fraud, abuse, corruption, forgery, bribe, usurpation, robbery, debit, false statement, deception, conspiracy, conflict of interests which can occur inside and outside the Bank.

Purpose of the Code of Ethics is to ensure that Board of Kuveyt Turk Participation Bank and all of its employees will carry out all the business regarding the bank within/out of the bank pursuant to the ethical principles specified and the "Ethical Banking Ethics Management" practice will be duly and accurately executed.

**2. SCOPE**

The provisions which are given in this CODE OF ETHICS shall cover all employees including the Members of the Executive Board of Kuveyt Türk and its affiliates. All Kuveyt Türk Employees including the Executive Board shall be responsible for aligning with and practicing the rules which are given in this CODE OF ETHICS.

The Executive Board and all employees shall sign this CODE OF ETHICS and undertake to align with the provisions hereof.

In cases of any condition which is not appropriate for the Code of Ethics or is likely to be inappropriate, each Board Member is solely liable to inform the Board.

The Board shall exclusively appoint one Member among the Board Members as its "Board Member Ethics Supervisor".

The Board also takes necessary initiatives and actions to ensure that the Bank's Subsidiaries will comply with the ethical rules in the Code of Ethics.

### **3. ETHICAL STRUCTURE WITHIN THE ORGANIZATION**

#### **3.1 Member of Executive Board in Charge for Ethics**

The Board Member Ethics Supervisor is liable to check the Ethical Banking Activity Reports in order to follow fulfillment of the arrangements to ensure that ethical practices of the Bank and its Subsidiaries will be carried out in accordance with the laws, legislation, and international standards, Bank's Code of Ethics, Ethical Principles and Policies.

- It enables to convey decisions of the Board which are taken about development areas with respect to the Inter-Bank Ethical Practices to the President of the Ethics Committee for the purpose of making them applicable.
- The Board Member Ethics Supervisor may assign President of the Ethics Committee to any matter which is suspected by the Bank or its Subsidiaries for contradiction with the Code of Ethics.

#### **3.2 Ethical Committee**

Ethical Committee shall be responsible for establishing and causing the establishment of an order in order to enable necessary adjustments, follow-up, audit inside the bank in order to ensure the performance of the Bank's ethical practices in alignment with the laws, legislation, international standards, Bank's Ethical Code, Ethical Principles and Policies, ensure the realization of the suggestions of the Member of Executive Board in Charge for Ethics, taking necessary actions in order to ensure the minimizations of the ethical inconsistencies and ensure the formation of satisfying results in terms of the Bank's ethical principles.

Duties and detailed information about the Ethical Committee shall be announced through the "Ethical Committee Policy".

### **3.3 Ethics Officer**

- He shall regularly check the Ethical Inspection Reports and incoming notifications from the Ethical Notification System and report them to the Ethical Committee.
- Ethical Committee shall determine the items of the agendum upon the approval of the Chairman of the Ethical Committee and make the Ethical Committee secretariat.
- He shall follow the practice and implementation of the working decisions which are taken by the Ethical Committee.
- He shall record the incoming requests and notifications from the Ethical Notification System. In case of any requests forwarded about the matters which are explicitly stated in the provisions of the Ethical Code or related Policies, he shall inform the related persons over the registered system.
- In case of any requests or notifications forwarded about the matters which are explicitly stated in the provisions of the Ethical Code which is in relation to the incoming notification from the Ethical Notification System or related Policies, he shall forward the matter to the Ethical Committee or the Disciplinary Committee Secretariat.

### **3.4 Ethical Messengers**

“Ethical Messengers” who can be found in our branches and units shall report their opinions and suggestions about the alignment with the ethical values and principles in the CODE OF ETHICS to the “Ethics Officer”. They shall play an active role in the implementation of the decisions of the Ethical Committee which are forwarded by the Ethics Officer.

## **4. KUVEYT TÜRK ETHICAL VALUES**

Kuveyt Türk Participation Bank created the CODE OF ETHICS within the scope of the ethical values which are adopted by the Executive Board and all employees. The Executive Board and all employees shall be responsible for adopting, practicing and ensuring the practice of the Ethical values. The main Ethical Values of Kuveyt Türk are as follows;

#### **4.1 SOUND BANKING**

Kuveyt Türk shall perform all its products and services in accordance with Islamic Financial Principles. Within this scope, it shall present its new products and services according to the opinions of the Advisory Board. Performing Participation Banking in accordance with Islamic Financial Principles, our company, calls this value “Sound Banking”. The Executive Board and all employees of Kuveyt Türk shall construe Sound banking principles according to the suggestions of the advisory board.

#### **4.2 JUSTICE**

Kuveyt Türk protects the rights of every addressee under any circumstances without pursuing interests, and it is objective in all cases. It does not confuse the rights of its shareholders, employees and customers. It acts with the conscience that the sense of justice is the most important value which is associated with not only behaviours in the society but also moral and belief rules.

#### **4.3 TRUST**

Kuveyt Türk grounds on living a trust based relationship with its shareholders, employees and customers with the power and support given by its sound capital structure, moral values, professionalism, sense of responsibility and technological infrastructure.

#### **4.4 PROFESSIONALISM**

Kuveyt Türk Executive Board and employees act with a specialized approach which is required for the business by being purified from personal feelings and thoughts and value the requirements of business ethics above everything. Kuveyt Türk Executive Board and all employees make efforts to perform their work in an excellent manner, do not compromise on quality, work in discipline, take responsibility about the work. It knows the need for professionalism in order to reach the targets, it has self-confidence and self-respect and it also approaches others’ feelings and thoughts with sensitivity and respect. It acts with social politeness in every environment.

## **4.5 INNOVATIVENESS**

Kuveyt Türk constantly researches and improves itself in order to reach the best in product, service and ways of working in line with its vision and targets. It acts with the conscience that being open for change without forgetting its roots is the first step for improvement. It aims to create difference by using all facilities required for this age by going beyond the clichés. To this end, it follows sectoral developments and all innovations in the world and our country.

## **4.6 TEAM SPIRIT VALUE PRINCIPLES**

Kuveyt Türk is aware of the fact that it is a big team and that being team increases power. Kuveyt Türk Executive Board and all employees regard each other as a large family and they protect the spiritual links that connect them with each other. They consider individual differences as richness and they know that it is necessary to act together in order to achieve a common purpose.

## **5. GENERAL ETHICAL PRINCIPLES**

Kuveyt Türk provides service in accordance with the below mentioned general ethical principles while practicing the ethical principles which were determined within the framework of the ethical values:

### **5.1 Honesty**

Kuveyt Türk Participation Bank abides by the principle of honesty in its relations during its activities. It strictly conform to the provisions of the legislation in effect in all of its activities.

### **5.2 Objectivity**

Kuveyt Türk Participation Bank treats everybody equally without discriminating between its employees and customers and it avoids prejudiced behaviours. It does not consider differences as nation, religion, status, sex, etc. as a qualification during the execution of the activities.

- Our Bank is obliged to take appropriate steps required to detect and eliminate any discriminating practices and assure equality within its areas of responsibility
- No discrimination may be exercised against the persons benefiting the services offered by our Bank or who have applied for such services or who are willing to obtain information about such services.
- No discrimination is exercised in any the employment process from the job advertisement to the termination of the employment.
- The job applications may not be rejected due to pregnancy, maternity and child care.

### **5.3 Transparency**

All customers are informed explicitly, clearly and comprehensively about the matters such as the rights and liabilities, advantages and risks in relation to the products and services which are offered to them.

### **5.4 Confidentiality**

Kuveyt Türk Participation Bank does not disclose the information regarding other banks and its customers to those other than the bodies which are explicitly authorized by the laws in this regard. The violations by Kuveyt Türk Executive Board and Superior Management in relation to confidentiality shall be taken into consideration and assessed. Necessary actions and methods shall be addressed in the meetings of the Executive Board and Superior Management.

Kuveyt Türk personnel shall never disclose the information about the account relations and transacting parties in Kuveyt Türk and they shall never make discussions about such information and they shall act in accordance with the provisions which are stated in detail in the Confidentiality Policy.

### **5.5 Ethical Perspective**

In case of hesitation of whether the decision to be taken or the practice to be performed is ethical or not while making a decision of performing a practice in any matter, our employees can make an ethical assessment by giving “yes” or “no” answers to the following questions in order to look at the event through “Ethical Perspective”.

In case they answer “no” to even one of the following questions, they should waive from taking that decision or performing that practice. In case of hesitation, they should negotiate the matter with the Bank’s “Ethics Officer”.

**1.Is it legal?**

Is my work legal? Will the results of my decision create an illegal condition?

**2.Is it in alignment with the values of our bank?**

Is it in alignment with the values which are accepted by our Bank? Can it lead to a result which will create a conflict with our values?

**3.Is it in alignment with the Ethical Principles of our Bank?**

Is it in alignment with the General Ethical Principles and areas of implementation in the CODE OF ETHICS of our Bank? Does it contain anything which is against a provision here?

**4. What if it becomes a newspaper headline?**

Can I be proud of myself if the work I do is published as the headline news in tomorrow's issue in the most frequently sold newspaper? Will be proud of what I have done?

**5. Is it in alignment with my own values?**

Is the work I will be doing in alignment with my personal values? Will I feel good after doing it? Can I be proud of what I have done?

**6. AREAS OF IMPLEMENTATION BASED ON OUR ETHICAL PRINCIPLES**

**6.1 Areas of Implementation in relation to Employees**

**6.1.1 General qualifications of the employees**

Kuveyt Türk is attentive to the fact that its employees consist of persons with knowledge, accumulation and responsibility for their duties. It does not employ any personnel who lack the legal conditions which are specified in the legislation including mainly Banking Law numbered 5411.

**6.1.2 Recruitment and career development**

Kuveyt Türk is attentive to providing equal opportunities in both recruitment and career development without discriminating between its employees. Based on the principle of managing human resources in the best manner, it provides its employees with training, courses, seminars etc. in order to make them reach the level of knowledge which is required for the age and banking profession.

In the occupational promotion of its employees, it considers knowledge, skills and individual success as well as commitment to Ethical Principles of Banking and attention to the practice of these principles.



### **6.1.3 Principles of representation and working environment**

Kuveyt Türk makes internal adjustments which stipulate its employees to be conscious about the fact they are representing the bank and they should be clean and well-groomed in alignment with the respectability of the banking profession.

It shall take actions to increase the motivation of its employees and provide services under better conditions, and ensure the creation of a healthy and safe working environment.

Kuveyt Türk Participation Bank has provided necessary conditions for the health and safety of its employees. Within this scope, Workplace Safety Regulations were prepared and Workplace Safety Specialist was employed.

### **6.1.4 Working hours**

Kuveyt Turk takes care to engage employees with an adequate number depending on the workload, organizes its employees in a way that maximum efficiency will be obtained within working hours, and does its best to ensure that the employees do not get out of the working hours and take their annual leaves in a regular manner.

### **6.1.5 Gifts Received and Given**

It is of great importance to avoid the gifts which are sent to our employees for their duties to create suspicion in terms of the objectivity of our corporate judgments and decisions for the third parties. Inappropriate relations with 3<sup>rd</sup> parties which may damage the reputation of Kuveyt Türk Participation Bank can be prevented by the presence of a corporate approach and practice about the acceptance of gifts.

Our employees will not request or accept any gifts, small gifts, invitations or monies for themselves or for others and they will not request or accept individual loans (other than the ordinary loans which are given by the loan organizations at the market rates) from any institutions or persons that do business or would like to do business with or are a competitor of Kuveyt Türk Participation Bank.

Detailed information about Gifts Received and Given are mentioned in the “Conflict of Interests Policy”.

### **6.1.6 Conflict of Interests**

Conflict of interests occurs when the personal interests of one of our employees and the interests of our Bank influence each other. Our employees shall avoid the disputes in which their own personal interests might conflict with the interests of Kuveyt Türk Participation Bank.

The employees of our Bank shall act in accordance with Kuveyt Türk's interests in their relations with customers, suppliers, contractors, competitor financial organizations or all persons, institutions and organizations that do business or would like to do business with Kuveyt Türk as in every phase of their duties. When this is not possible, in case of any transactions or relations which might create any conflict of interests, they shall report it to the Ethics Officer or the Directorate of Human Resources.

Kuveyt Türk shall announce what should be done to avoid encountering conflicts of interests and how to act in case of encountering conflicts of interests to all of its employees through the "Conflict of Interests Policy".

### **6.1.7 Indebtedness**

Our employees should under no circumstances borrow money, provide advantage from, enter into surety relationship with customers, third persons during the implementation of their duties or in relation to such duties.

Considering the characteristics of the finance industry, our employees should not be indebted above their financial power. Our employees should exhibit a balanced and harmonized attitude both in their professional lives and about their personal financial conditions.

Our employees should also be sensitive towards mutual Indebtedness between subordinate-superior in order to ensure avoiding the damage the relationships.

Detailed information about Indebtedness can be found in the "Conflict of Interests Policy".

### **6.1.8 Insider Trading**

The use of the information which cannot be normally known by outsiders but is obtained by exploiting the authorization of access due to an insider's duty and status in the Bank for personal interests is called insider trading.

Kuveyt Türk employees cannot perform any purchase and sale through the information which is obtained from inside with regard to a financial product which will provide advantage on their own account or in favour of their family members or friends, they cannot share the information about the new products and services which have not been released to the market yet or the information about the bank which would influence the share values of the bank with anybody outside the bank.

It is forbidden for our employees to disclose the information which is obtained from inside to anybody else or persons outside the Bank who can make advantage of such information.

Detailed information about Insider Trading is given in the "Insider Trading Policy".

### **6.1.9 Relations with Employees**

The Bank carries its relations with its employees in line with the Basic Principles which are specified in the CODE OF ETHICS.

The Bank is attentive to make its employees consist of persons with knowledge, accumulation and sense of responsibility for their duties and provide them with equal opportunities in both recruitment and career development without discriminating between them. Kuveyt Türk Participation Bank offers its employees training opportunities for their professional and personal development in order to enable them to reach the level of knowledge which is required for the market and banking profession based on the principle of managing human resources in the best manner.

The Bank also considers being attentive to not only the experience, competence and individual performance but also practicing commitment to the Ethical Principles and the principles which are defined in the CODE OF ETHICS in the career development of its employees.

The Bank expects its employees to meet the indicators of behaviours which are determined within the scope of "Alignment with the Values" which is one of the basic areas of competence in the performance competence assessment measurements of its employees.

The Bank is attentive to provide the rights arising from the provisions of the legislation which its employees are subject to in complete and on time. It takes actions to increase the motivation of its employees in all service units, and ensure the creation of a healthy and safe working environment. It is also attentive to employ people in a suitable number for work intensity, and organizes its

employees to receive maximum efficiency from them within the working hours, shows maximum effort about avoiding going out, out of working hours and using annual leaves regularly.

The Bank promotes the activities of its employees in the field of social responsibility at the workplace. Within this scope, it can organize bazaars, donations, social events etc. for charity purposes at the workplace within the knowledge and approval of the Directorate of Human Resources. Employees can share illuminating and sufficient knowledge in relation to the organization that they wish to hold with the Director of Human Resources and hold the activities at the place, time and hour they have mentioned. After the completion of the activity, it is necessary to forward the document/voucher which shows the execution of the donation to the Director of Human Resources.

The Bank expects its employees to avoid unethical behaviours within the scope of the CODE OF ETHICS and enter into unwanted relations with both customers and other interest owners within the scope of the CODE OF ETHICS and/or basic code of conduct.

#### **6.1.10 Drug Use and Social Relations**

It is forbidden for our employees to consume all kinds of drugs and alcoholic substances which might influence their working performance. This prohibition shall also cover being under the influence of these substances which might influence the working performance of the employees at the time they enter into the Bank's premises. It is also forbidden for our employees to deal with activities such as betting, gambling etc. which might damage the Bank's reputation in the public opinion. It is forbidden for all employees to supply gambling instruments, organize or participate in any kinds of gambling activities such as all kinds of property or monetary reward lotteries, buying and selling tickets for such games. Contrary behaviours can be subject to Disciplinary Query.

#### **6.1.11 Account Transactions**

Due to the nature of many positions in the Bank, our employees should process customer account transactions such as converting cheques into money, approving loans etc. Our employees should not have the authorization to process or approve the transactions in relation to their own personal accounts, the accounts of their first degree family members or the accounts on which they might have interests or the accounts on which they have the signatory authorization.

This is including but not limited transactions such as repayment, cancellation or postponement of the expenses, use of internet passwords, approval and increase of loan limits, conversion of the cheques into cash, opening accounts, funds transfer, buying or exchanging etc.

There might be other restrictions as well in relation to the personal accounts, the accounts of the family members or the accounts of the colleagues. It is highly important for our employees to consult to their managers in relation to the authorizations and restrictions in their own work branch or position.

All account transactions should be processed in compliance with the rules and procedures of Kuveyt Türk Participation Bank. Deviation from the procedures will absolutely be within the scope of the disciplinary inquiry because it means the violation of the standards.

#### **6.1.12 Authorization**

Systematic authorizations of the employees are determined within the framework of their task definitions/positions. The employees cannot make transactions out of their own authorizations/task definitions except for the provisional tasks. Giving the employees wrong authorizations which are not related to their tasks does not mean this authorization can be exercised. The employees cannot exercise the authorizations which are not included within their tasks and areas of responsibilities and they shall report the wrong authorizations to the relevant persons or departments. The passwords which are specific for the employees cannot be shared with any other employees or third persons under any circumstances. Necessary disciplinary items will be processed in case the employees perform transactions outside their authorizations.

#### **6.1.13 Commission Revenues and Other Payments**

The payments which cover the fees and commissions are an integral part of our business activities. At all cases, competition should only be based on meeting the requirements of our customers and protecting the prices and quality of our services.

No payment or a different adjustment should be made to violate this article, reduce our ethical standards or infamize the name of the Bank under any circumstances.

#### **6.1.14 Use of Company Assets and Technology**

All kinds of properties, assets, equipments, vehicles, computers, computer programs etc. which belong to or procured by the Bank for its employees to carry out daily works cannot be used by any employees for their own personal interests or the personal interests of others.

The telephones, personal computers, photocopy and fax machines, supplies, post services, e-mails, announcement boards and meeting rooms of the Bank are mainly for the company use. The use of these sources or other sources of the Bank for personal purposes can disrupt the information flow which is very important.

Personal phone calls should be limited to a certain time and the e-mail system which is provided by the Bank should not be used for personal correspondences.

The Bank's internet and intranet system is for transactions, communications and researches in relation to the business. They cannot be used for purposes other than these purposes, to involve the working hours, and/or for obscene, pornographic, terrorism oriented purposes etc.

#### **6.1.15 Assignment Out of Organization**

The Bank's employees cannot be involved in works which directly or indirectly require them to be considered merchants or tradesmen (considered "Commercial Enterprise" or "Tradesman Enterprise"). They cannot act as the member of the executive board and/or auditor in the companies and they cannot work paid or unpaid in any works of the real or legal persons without obtaining written consent other than the Bank's affiliates.

Our employees can receive the proposal to participate in out-of-company activities as speakers or consultants paid or unpaid with the experience they have gained during their working life. Such opportunities should be assessed by the Directorate of Human Resources in order to determine whether there are any conflicts between personal and corporate interests.

Our employees can take tasks outside the company (other than the circumstances which will require them to be considered "Commercial Enterprise" or "Tradesman Enterprise") upon the approval of the Deputy General Manager, related Department Manager and Human Resources.

### **6.1.16 Business Related Communication and Records**

All kinds of written or verbal communication should be made professionally and in compliance with the ethical rules. Things we have said, things we have written and things we have done should clearly reflect the ethical values and expectations of the Bank and mark the presence of a healthy personal judgment. Exaggeration, lexicaphanicism, too short cut expressions, legal speculations, humiliating words and attitudes towards people, companies and their products and services should always be avoided.

Everything said, written and done by our employees should aim to protect and reflect the Basic Principles which are determined by the Bank within the scope of the CODE OF ETHICS. This policy applies for all kinds of communication including voice messages, emails, official notes and reports.

### **6.1.17 Severe Abuse of Authorization**

Actions and behaviours which are considered abuse of authorization shall require the immediate termination of the labour agreement of the employee. Detailed information about the abuse of task and punishments given are announced to the employees in the Disciplinary Regulation.

### **6.1.18 Bribe**

Bribery means to offer a direct or indirect payment or interest to our employees in order to gain benefit; affect the decisions and practices in an illegal manner. It can be seen in many forms such as making cash or non-cash payments, providing valuable gifts, offering an advantage that will gain personal benefit for the employee.

Accepting a gift from a customer or an associated person during an ongoing process is called as a bribe. Therefore, no gift should be accepted from the customers or any person or institution that is associated with this process.

The areas that fall into the bribery scope and the rules to be followed thereof are included in the "Conflict of Interest Policy" and announced to all the employees.

Constant repetition of the faulty operations that will damage the Bank and/or give rise to the customer dissatisfaction may cause the employee firstly to receive verbal and then written warning. In cases where any misrepresentation, alteration and/or negligence is identified in the Bank's general transactions, a senior manager should be immediately notified of this situation.

#### **6.1.19 Mobbing**

The employees cannot apply mobbing (harassment) to each other for any reasons.

Mobbing can only be uttered to when it is applied in the workplace, it is continuous and made intentionally, contains targets such as intimidation, leave of employment etc. and results in financial/emotional damage in the victim.

The Bank provides training and informing activities in order to raise its employees' awareness about mobbing.

The employee who thinks that he is exposed to such behaviours which are not in conformity with the Basic Ethical Principles of Our Bank can report this employee of the Bank who applies mobbing to the Directorate of Human Resources by using the address [calisanmemnuniyeti@kuveytturk.com.tr](mailto:calisanmemnuniyeti@kuveytturk.com.tr). All information including the situation he is experiencing, identity details etc. regarding this employee who makes a complaint over this line shall be kept confidential and examination shall be performed by the Employee Satisfaction Committee. As a result of determining the employee who applies mobbing, the employee who applies mobbing will be referred to the Disciplinary Committee.

The practices within the scope of the Labour Law numbered 4857 and the Circular on Prevention of Mobbing at Workplaces numbered 2011/2 shall complement this law.

#### **6.1.20 Personnel Movements**

Kuveyt Türk shall avoid all kinds of practices which can lead to unfair competition in terms of personnel recruitment.

Pursuant to the provisions of the Labour Law and applicable legislation, there is no freedom of contract and movement in personnel recruitment and attention will be given to prevent recruitments from interrupting the services of other banks.

Objective and honest treatment are important while answering the information which is requested from other banks about their former employees.



### **6.1.21 Retaliation**

Any discouraging or preventative concrete and abstract activity that are carried out by the person or parties reported in case of an actual or possible ethics report.

### **6.1.22 Business Intelligence**

If Kuveyt Türk Participation Bank has to gather intelligence on its customers, it shall do so only for business purposes and only to decide on the Bank's products and services. Any information received during such intelligence gathering shall be used only by the authorized persons of the Bank for evaluation, and shall not be shared with any third parties.

## **6.2 Areas of Implementation in Legal Matters**

### **6.2.1 Compliance**

Kuveyt Türk employees shall abide by all international norms and the regulations and standards within the framework of the national legislations to which it is subject to mainly including the Banking Law. The legal legislations in this regard shall be announced to all employees and updated. Questions encountered in relation to Compliance shall be resolved by forwarding them to the Directorate of Compliance. Controls and audit processes in relation to Compliance shall be carried out by the Directorate of Internal Control and Inspection Committee. Contrary processes shall be assessed by the Disciplinary Committee.

### **6.2.2 Fighting against Laundering Proceeds of Crime and Terrorism Financing**

Kuveyt Türk Participation Bank shall adopt fighting against laundering proceeds of crime and terrorism financing as an important principle within the framework of international standards and the provisions of national legislation, and cooperate with both internal and other institutions and organizations and competent bodies in relation to the matter within the framework of the applicable legislation. It shall act within the framework of the "Fighting Against Laundering Proceeds of Crime and Terrorism Financing Policy" and the implementation principles and general principles which are enclosed in this policy.

### **6.2.3 Keeping Accurate Records and Books**

Integrity, accuracy and reliability in all kinds of records, documents and financial tables are of great importance in terms of the continuation of the success and future of the Bank. Therefore, our employees are responsible for ensuring the accuracy and legality of the records, documents and papers in all kinds of transactions that they carry out on behalf of the Bank.

In addition to accounting and audit records, time records, loan papers, phone records, transaction records and all other records which are a part of our daily work flow shall be included within the scope of such documents. All records should reflect the transactions correctly and according to their time and any errors should be promptly corrected.

Constant repetition of the wrong transactions which will damage the Bank and/or lead to customer dissatisfaction can result in primarily verbal warning and then written warning for the employee.

In case any deception, amendment and/or negligence is found in the general operations of the Bank, the superior director should be immediately informed about this.

### **6.2.4 Performance Manipulations and Campaign Irregularities:**

Employees of Kuveyt Turk Participation Bank may not perform any transaction or act in order to realize their specific performance targets against the Code of Ethics. They achieve the relevant targets by carrying out the works which are expected from them within the framework of the Values and Ethical principles. They do not take part in any manipulative act or allow their colleagues to take part in.

The Bank shall not try to gain success in the Campaign by utilizing the terms for participation in a Campaign which is held for domestic or foreign customer for its benefit, fulfilling the terms for participation in the Campaign against the Values and Principles which are covered in the Code of Ethics. It notifies any personnel who acts in this way via the Ethics Notification System.

### **6.2.5 Regulating the Work Expenditures**

When Kuveyt Turk Participation Bank is required to make an expenditure related to its personnel, it may not exercise the authorities and facilities granted to it with the intent of damaging the Bank or breaching the Values and Ethical Principles provided in the Code of Ethics. It keeps a proper record for the relative expenditure and documents for the relative persons. It does not exploit the expenditure facilities granted by the Bank for manipulation or interest relationship.

Kuveyt Türk announces detailed information on the Media and Relationship to all of its employees with "Press Declaration Regulation".

### **6.3 Areas of Implementation in Relations with Customers**

#### **6.3.1 Rules of Protection of Customer Interests**

Kuveyt Türk Participation Bank shall make transactions in line with the Basic Principles which are specified in the CODE OF ETHICS with respect to all kinds of products and services offered to its customers. The Bank shall offer objective and fair service to the customers who receive the same service. The main purpose of the Bank is to meet the requirements of its customers at the highest level. Customer dissatisfaction determines the success or failure of the Bank and it is the best means of advertisement for the products and services offered. Therefore, in every relation established with the customers, transactions shall be made within the framework of accurate, complete and timely information transfer as well as professionalism and politeness within the limits which are specified in the legislation.

Kuveyt Türk Participation Bank determined the customers' rights in the bank in written in "Customer Satisfaction Policy" and published on its web page. Accordingly, it is obligatory to realize the requests of our customers in line with their rights from our bank.

Kuveyt Türk Participation Bank shall protect the customers' interests and it shall inform its customers in a transparent, honest and clear way while allowing them to use their products and services.

It shall direct its customers not to use the products and services which are not in accordance with their own incomes and living conditions. It shall prevent its customers from using the products and services which will negatively influence their interests apart from their legal rights.

#### **6.3.2 Product and Service Safety**

Kuveyt Türk Participation Bank shall prioritize the safety of its customers in the products and services offered to them. It shall not provide any products or services which might risk or reduce the safety of its customers.

Kuveyt Türk Participation Bank shall also assess the prevention of information transfer the attitudes and behaviours in the general service process as well as the actions regarding protection of the sector specific service environments against all kinds of negative things and all kinds of violations which can lead to

technical damages in the services offered to the customers within the safety policies. Services which are developing in parallel with technological advancements and electronic banking and all necessary technical and legal actions for ensuring transaction security in all kinds of service environments due to changing service channels shall be constantly taken and/or updated. Customer should be constantly informed about the actions taken in relation to these and the actions to be taken by the customers.

### **6.3.3 Informing**

Kuveyt Türk Participation Bank shall assess the customers' questions and problems in relation to the services offered as a part of quality management. It has established several application and notification lines in this regard and it shall inform the customer about the situation by taking actions in relation to the incoming notifications. Customers' questions shall be answered in a transparent and correct manner. The questions which underlie the notifications shall be investigated and necessary actions shall be taken in order to avoid their repetition. The employees shall be informed in order to correct the wrong practices which lead to customer dissatisfaction and prevent their repetition. Channels of communication through which the customers can forward their requests and the customers' method of forwarding such requests are announced to the employees in detail through the "Customer Satisfaction Policy" and shared with the customers on the web page.

### **6.3.4 Honesty in Marketing**

Kuveyt Türk Participation Bank focuses on protecting the rights and welfare of its customers and on ensuring fairness in its marketing operations. It complies with the following ethical principles within the scope of marketing ethics;

- During the offering of the products to the customer, focusing on the customer need and not trying to make the customer use a product that he/she does not need,
- Not giving the customer any misleading information about the product,
- Presenting both the good and the bad aspects of the products to the customer in a transparent manner,
- Not competing unfairly,
- Not defaming the competitors,
- Providing accurate information in publicity and advertising, avoiding sexuality and child abuse,

- Not allowing any content in advertisements that would encourage the customers to purchase more than they need,
- Avoiding any action that would harm the society in the long term,
- Protecting the ecological environment.

#### **6.4 Areas of Implementation with Third Parties**

##### **6.4.1 Competition and Relations with Competitors**

Kuveyt Türk Participation Bank acts by giving information and services which do not contain deceptive information without discrediting its competitors within the framework of professional working rules in Competition and Relations with Competitors.

The Bank shall execute its relationships with other banks within the framework of the extent permitted by the legislation in effect and in the light of the General Ethical Rules which are specified in the CODE OF ETHICS. Within this framework, it shall accurately and systematically implement its information exchange with other banks in every regard.

The Bank cannot enter into harmful competition which can damage both its own structure and other banks and the sector during the execution of its operations. The Bank considers competition as a competition between all banks in the sector which ensures taking independent economic rules in compliance with the legislation. It shall not have any statements and behaviours which can result in unfair competition within the framework of the continuity of the confidence in the sector, the development of the sector and the principles of surveillance of common interests. This shall apply for the legal entity of the Bank as well as all employees. The decisions in this regard shall be taken by the related sector representatives and Marketing Directorates.

##### **6.4.2 Intellectual Property and Commercial Rights of Third Parties**

Kuveyt Türk Participation Bank cannot be in a practice to seize or misuse of the intellectual property rights and commercial rights of the third persons due to its values and respect towards the rights and individual freedoms of the third persons. It shall take necessary actions to avoid being involved in such a situation in an unwanted and uncontrolled way, and it shall make the corrections to protect the rights and properties of the related parties and undertake the necessary responsibility in case of encountering such a situation. All units which buy intellectual property and commercial rights from

the third persons shall be responsible for showing maximum diligence and legally control this process in order to avoid experiencing problems in this regard.

#### **6.4.3 Surveillance of Social Utility and Environmental Impact and Social Responsibility**

Kuveyt Türk is attentive to the surveillance of social utility along with commercial profitability and provision of support for social and cultural activities within the framework of the principles of environmental impact as well as regulations on environment, consumer and public health in all services and operations.

Kuveyt Türk also established “Corporate Management Committee” to ensure alignment to Corporate Management Principles within this framework and follow the actions taken and perform enhancement works in this regard and make suggestions to the Executive Board in this regard.

Kuveyt Türk explains on its web page the information which can be a concern of shareholders and beneficiaries and which does not involve trade secrets pursuant to its principle of disclosure and transparency. It has also created a corporate portal in order to increase in-company communication and rapidly inform its employees.

Kuveyt Türk mentioned its Social Responsibility principles in detail in its “Corporate Social Responsibility Projects Functioning Policy”.

#### **6.4.4 Politics and Relations**

Kuveyt Türk determines a work independent from politics pursuant to its values and working principles and it does not refer its customers or employees politically.

Our employees are not allowed to have an active duty in any political parties. None of our employees can have a concern of political source management works or campaign activities at the workplace and use the company for these activities.

No direct or indirect donations (in cash or otherwise) can be made to provide advantage for the Bank to the political parties, political organizations and the representatives and candidates of such groups on behalf of the Bank. Our employees should avoid the situations which might mean moral and material support to the political parties on behalf of the Bank.

Our employees cannot make any donations or similar requests from the customers or other employees even if they are on behalf of political unions or several organizations.

None of our employees can request their colleagues to support or protest against any political groups or candidates or publish political notifications. They cannot be involved in the distribution of the political notifications.

#### **6.4.5 Relations with Public Institutions**

Kuveyt Türk Participation Bank can communicate public institutions and organizations at different levels with respect to several activities. It is essential to act in line with the General Ethical Principles which are also considered CODE OF ETHICS in the communications of the Bank. The information, documents and records which are requested for audit and control purposes pursuant to the applicable legislation shall be supplied to the related authorities accurately, in complete and on time. As in the relationships with all other parties, it is necessary to avoid behaviours which might seem to be request of favouritism or influencing the decisions of the opposite party in the communications with public institutions. In Relations with Public Institutions, bank's employees should be behaving to correctly represent the bank in every environment and platform.

#### **6.4.6 Relations with Media**

The Bank considers the General Ethic Principles which are specified in the CODE OF ETHICS in its relationships with press organs. The press relations in relation to the Bank shall be carried out by the Directorate of Corporate Communication and Introduction. All external relations shall be maintained within the procedures which are determined by the Bank. All incoming requests of written and verbal press, reportage requests and all questions shall be promptly referred to the Directorate of Corporate Communication and Introduction.

Our employees shall avoid situations which can result in any speculations, negative assessments in relation to the institution in the Bank's relations with the press and practices and behaviours which can damage the trust, reputation and consistency of the Bank or the sector or create unfair competition.

It is forbidden to establish communication to damage the Bank's reputation in all kinds of information exchange to be made with the Bank on social media channels. Social Media Personnel Behaviours Guide which is published by the Directorate of Corporate Communication shall be taken into consideration in the posts made on social media.

The Bank behaves honestly and realistically, in alignment with legal regulations and general morals in the announcements, notices and advertisements with respect to the introduction and marketing of both its own financial structure and its banking products and services, it avoids all kinds of actions which might damage the reputation of participation banking. It shall not include expressions or inscriptions which discredit other banks or other banks' products and services in its announcements, notices and advertisements.

Kuveyt Türk announces detailed information about Relations with Media to all its employees through "Statement to Press Regulation".

#### **6.4.7 Relations with the Suppliers and Other Parties**

It is essential to establish a relationship model that will reflect the corporate culture of the bank at the best, pursue the supplier rights fairly by taking part in the mutual win-win relationship keeping in mind that the suppliers are the business partners.

The Bank considers the General Ethical Principles set forth in the Code of Ethics in its relations with the suppliers and other interest owners who are not listed in this policy. No action that will affect performance and independence of the core activities shall be taken with the suppliers and/or other parties. The information learned about these parties is kept confidential under the Code of Ethics and not shared with anyone who is not legally authorized.

The Bank employees should always display actions to represent the bank duly in relations with the suppliers at all environments and platforms. All units which are in relation with the suppliers have responsibility thereof.

The transactions should be initiated after the Supplier firms sign the "Supplier's Code of Ethics" issued upon approval of the Ethics Committee. In the event that the services are offered in contradiction with the Supplier's Code of Ethics, this matter should be referred to the Ethics Manager or Ethics Notification System.



## **7. CUSTOMER RELATIONS ETHICAL PRINCIPLES**

Kuveyt Türk offers its products and services to its customers within the scope of ethical principles. Our customers should receive the products and services they need in the desired quality and receive accurate consultancy.

Kuveyt Türk targets high service level and forms its practices and all process on this target. Customer satisfaction and service quality in customer relations are periodically measured and necessary actions are taken.

Kuveyt Türk employees provide necessary service without violating politeness rules within the scope of the ethical principles while serving their customers. Service processes and the behaviours and practices exhibited in these processes are given in detail in “Principles of Practicing Service Standards” document. Regular participation of the employees in the training programs shall be ensured in this direction.

Kuveyt Türk has shared its Customer Ethical Principles with its employees in detail in “Customer Satisfaction Policy”. Customer Rights which are also included in this Policy are also shared with the customers on the web page of the company.

All matters in relation to Customer Relations shall be evaluated by the Customer Services Committee. This Committee shall make decisions about the appearance of new practices and removal of customer complaints as a result of the evaluations.

## **8. FEEDBACK SYSTEM IN RELATION TO CODE OF ETHICS**

All employees who encounter with the violation of the CODE OF ETHICS, suppose any ethical violations or suspect any ethical violations should use the “Ethical Notification System (ENS)” for the analysis and evaluation of such violation without hesitation, without worrying about confidentiality and without any fear.

Kuveyt Türk employees / business partners shall be responsible for reporting any determinations or suppositions about the CODE OF ETHICS by means of mail or email. All notifications will be evaluated in absolute confidentiality under all circumstances. Ethics Officer shall be responsible for keeping the notification confidential.

All notifications submitted are recorded, examined and the results are reported to the senior authorities.

The relevant system is configured on the BOA. All staff have access right. If the relevant persons desire, they are entitled to make notification under the option of "hide my name".

The final decision on investigation of the case, if necessary, conduct of any examination or interrogation, taking precautions for all notifications communicated shall be taken by the Ethics Committee.

#### **Notifications which will be Sent by Mail**

Kuveyt Türk employees / business partners who wish to report the wrong practices of the employees can send their notifications to the address Cumhuriyet Mah. Özgürlük Cad. No:11/A Çayırova KOCAELİ directly on behalf of the Ethics Officer.

#### **Notifications which will be Sent by Email**

Kuveyt Türk employees / business partners who wish to report wrong practices by email can use the electronic mail address [etikbildirim@kuveytturk.com.tr](mailto:etikbildirim@kuveytturk.com.tr) . This electronic mail address is only open for the access by the Ethics Officer, Member of Executive Board in Charge for Ethics and the Chairman of the Inspection Committee and analysis and inquiry inspectors.

Electronic mail address [etikbildirim@kuveytturk.com.tr](mailto:etikbildirim@kuveytturk.com.tr) can receive notifications from inside or outside Kuveyt Türk.

#### **Notifications which will be Sent by Phone**

Kuveyt Türk employees / business partners who wish to report wrong practices by phone can send their notifications by calling the Ethics Notification Line no ..... Kuveyt Türk employees / business partners who call the Ethics Notification Line can make their notifications to the answer machine without working hours limit.

The incoming notifications to the Ethical Notification Line can only be listened to by the Ethics Officer, Member of Executive Board in Charge for Ethics and the Chairman of the Inspection Committee and analysis and inquiry inspectors.

#### **Notifications which will be Sent through the System**

Ethics Notifications will be entered in the "Ethics Notifications System (ENS)" as soon as the institution's requests are entered. The information in this area which is open for 24/7 entry can only be analyzed by the Ethics Officer, Member of Executive Board in Charge for Ethics and the Chairman of the Inspection Committee and analysis and inquiry inspectors.

### **Protection of Rights**

After any reporting by any person, the reporter and the reported shall be protected against all forms of retaliation.

#### **Rights of the Reporter**

1. The identity of the reporter may only be disclosed upon the consent of such person or if the reported person has been granted the right to obtain the identity of the reporter by a court decision. In such a case, the Bank must inform the reporter in this regard before disclosing his/her identity.
2. The reporters shall be protected; they shall not be subjected to any retaliation in any way because of the events they have reported. The Bank shall take the necessary measures in this regard.
3. In case any reporter is treated unfairly or mistreated for his/her report or if he/she is too worried/afraid of the occurrence of such situations, he/she may request the Human Resources Department to take preventive measures.
4. It is forbidden to make any retaliation against any reporter acting in good faith. Since any contrary behavior means that the code of ethics and loyalty principles of the Personnel Regulation are violated, any personnel involved in such behaviors shall be punished in accordance with the Discipline Regulation.

## **9. CODE OF ETHICS TRAININGS**

The Bank adds an adequate number of courses, seminars, conferences, workshops and similar training activities into the "Annual Training Program" and implements them with the aim of informing all employees of all the principles and guidelines and ethical rules as specified in the Code of Ethics.

"Ethical Information" on the Code of Ethics shall be provided for all the staff within the relative year.

"Code of Ethics Training" is included in the trainings that will be received by the new personnel.

## 10. CODE OF ETHICS ALIGNMENT TRACKING

Alignment with the principles in relation to CODE OF ETHICS shall be handled by the Directorate of Internal Control and Inspection Committee for evaluation. In the audits and inspections, the status of alignment with the CODE OF ETHICS shall be checked. Information should be given about the alignment with the Audit and Inspection reports.

The suspicious transactions which are not in alignment with the CODE OF ETHICS shall be examined by the Directorate of the Inspection Committee. Inquiry will be started about those concerned if it is detected that such transactions were made as a result of the examination. Inquiry processes shall be carried out by the Directorate of the Inspection Committee. The information which is obtained after the inquiry will be reported to the Ethics Officer. The related matters will be reported by the Ethics Officer to the Ethical Committee.

If the action detected contains a situation which requires support and appreciation, the Ethical Committee will evaluate it and decide what should be done.

In case of any situation which requires punishment after the action detected, the issue will be referred to the Disciplinary Committee. Decision will be taken about whether the result will stay in the Bank or whether criminal complaint will be made. The Disciplinary Committee can request legal opinions from the lawyers of our Bank when necessary.

## 11. GLOSSARY OF TERMS

**Kuveyt Türk:** Kuveyt Türk Katılım Bankası A.Ş

**Executive Board:** Executive Board of Kuveyt Türk Katılım Bankası A.Ş

**Auditing Committee:** Auditing Committee of Kuveyt Türk Katılım Bankası A.Ş

**Employees:** Employees who work paid or contracted in Kuveyt Türk Katılım Bankası A.Ş and its affiliates

**Business Partners:** All persons or organizations that provide all kinds of external services for Kuveyt Türk Katılım Bankası A.Ş and its affiliates against contract

**Sound Banking:** the name by Kuveyt Türk for Islamic financial principles

**Ethics Notification System:** The system application which is provided for making notifications in ethics related matters

**Conflict of Interests:** the situations in which the interests of Kuveyt Türk employee himself, his supporters, the parties with which he has interests or any relationship, third persons or institutions and the interests of our Bank influence each other.

**Ethical Messenger:** persons in our branches and units who submit and report their opinions and suggestions about the alignment with the ethical values and principles in the CODE OF ETHICS which are announced to the whole institution.

**Ethical Perspective:** Making use of all ethical information and related persons and giving priority to ethical behaviour in order to make sure that the decision to be taken or the practice to be conducted is ethic while taking decision or conducting practice in any matter.

**Insider Trading:** The use of the information which cannot be normally known by outsiders but is obtained by exploiting the authorization of access due to an insider's duty and status in the Bank for personal interests is called insider trading.

**Associated Parties:** Persons or enterprises which are associated with Kuveyt Türk" within the scope of the financial tables are called "Associated Parties.

**Affiliate:** Partnership, being a partner, shareholding.

**Bribe:** Bribe is directly or indirectly offering payments and interests to our employees for the purpose of making illegal advantages and influencing decisions and practices.

## **12. EFFECTIVE AND VALIDITY DATE**

This policy and its practicing procedures shall take effect on the date when they are approved by the Executive Board. They shall be revised by the Directorate of Quality and Organization Development and take effect again upon the approval of the Executive Board when necessary.