Our Ethical Principles

Our ethical principles are drawn to enlighten us in all kinds of transactions, behaviors and decisions. New Generation Akbank reaches for the future on these principles. As Akbankers, we adhere to the ethical and occupational principles of the banking sector and the professional codes of conduct in all kinds of our way of performing the activities and our behavior. Our objective in all our studies is gaining social benefit by looking after the protection of the environment along with developing banking sector and maintaining trust in the sector. While accommodating ourselves rapidly to the innovations of the digital world, we never give up simplicity and we focus on customer satisfaction in our studies.

Our Basic Values Which Our Ethical Principles are Based on

<table>
<thead>
<tr>
<th>Integrity:</th>
</tr>
</thead>
<tbody>
<tr>
<td>We're honest in our studies and behaviors and in our relations with customers, our colleagues and other stakeholders.</td>
</tr>
<tr>
<td>We do not make sales without our customers’ open request or approval and receive their approvals in all kinds of transactions.</td>
</tr>
<tr>
<td>We state honestly the products we believe as not for the benefit of our</td>
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<table>
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<tr>
<th>Reliability:</th>
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</thead>
<tbody>
<tr>
<td>We know that trust lies behind banking and offer reliable service.</td>
</tr>
<tr>
<td>We keep our words on products and services and sustain our reliability.</td>
</tr>
<tr>
<td>We take measures required for protection of customer assets which we’re obliged to keep.</td>
</tr>
</tbody>
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<table>
<thead>
<tr>
<th>Customer Orientation:</th>
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<tbody>
<tr>
<td>Our customers are in the center of our studies. We first pursue the interests of the customers and work customer satisfaction oriented in customer transactions.</td>
</tr>
<tr>
<td>We get acquainted with our customers and listen them and offer products and services in compliance with their financial needs and expectations. We provide solutions to customer complaints quickly and work proactively to avoid complaints.</td>
</tr>
<tr>
<td>We inform our customers on expectations, risks, advantages, disadvantages, expenses and gains relevant to our Bank’s products and services in time, correctly and explicitly and receive their approvals for all transactions.</td>
</tr>
<tr>
<td><strong>Transparency:</strong></td>
</tr>
<tr>
<td>-------------------</td>
</tr>
<tr>
<td>We make explicit, honest and transparent explanations to our customers, avoid using technical terms which they may not understand and avoid using misleading expressions.</td>
</tr>
<tr>
<td>We inform our customers explicitly, completely, accurately and in time on interests the products and services of our Bank shall provide, risks, expenses and gains which may arise.</td>
</tr>
<tr>
<td>We show care for all agreements, documents and forms submitted to our customers to have contents compatible with the process and to be coherent.</td>
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<tr>
<th><strong>Sustainable Customer Relation:</strong></th>
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</thead>
<tbody>
<tr>
<td>Our priority in our services is contributing in long term and sustainable customer relation.</td>
</tr>
<tr>
<td>We show attention in balancing our short-and long-term revenues for our customers and stakeholders.</td>
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<table>
<thead>
<tr>
<th><strong>Ensure Social Benefit:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>We put social contribution practices into life for sustainable development and social participation.</td>
</tr>
<tr>
<td>We develop social responsibility projects in culture, art, education, etc. fields.</td>
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</table>

<table>
<thead>
<tr>
<th><strong>Pursue Environmental Protection:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>We conduct studies for effective use of natural resources and mitigating our wastes arising from our processes.</td>
</tr>
<tr>
<td>We follow laws and regulations relevant to environment.</td>
</tr>
</tbody>
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<table>
<thead>
<tr>
<th><strong>Impartiality:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>We do not allow subjects involving discrimination as race, gender, religion, ethical origin, nationality, political view, age, disability, marital status, sexual preference, etc. in all our behaviors towards our customers.</td>
</tr>
<tr>
<td>We never involve in discussions on subjects involving discrimination.</td>
</tr>
</tbody>
</table>
We know that rules we have to adhere in our behavior and studies are not limited with those stated in here. Regarding this, we completely comply with **Law on Protection of Personal Data, Social Media Using Policy for Employees, Digital Security Principles, Information Security Regulations, Information Security Code of Practice and Information Risk Management Policies**.

In case we encounter with a situation not written in our ethical principles and relevant regulations, we act in the light of our features based on our principles and consult relevant units for situations we are not sure of.

1. **Consult relevant units.**  
   Is behavior / practice / transaction in compliance with legal legislation?  
   No End behavior / practice / transaction and report to Ethics Line  
   Yes

2. **Review our Bank’s policies.**  
   Consult relevant units.  
   Is behavior / practice / transaction in compliance with Our Bank’s Policies?  
   No End behavior / practice / transaction and report to Ethics Line  
   Yes

3. **Consult relevant units.**  
   Does behavior / practice / transaction contradict with moral values, Our Bank’s Values, ethical principles and culture?  
   Yes End behavior / practice / transaction and report to Ethics Line  
   No

4. **Consult relevant units.**  
   Does behavior / practice / transaction cause moral and/or material loss and affect our shareholders negatively?  
   Yes End behavior / practice / transaction and report to Ethics Line  
   No

5. **Action may be taken** for behavior / practice / transaction.
We know that we have to adhere to ethical principles completely to protect success and reputation of our Bank. Accordingly, whenever we encounter with a behavior or transaction against our ethical principles or have a doubt in this respect, we definitely report these contradictions to our superiors and/or Ethics Phone Line. Furthermore, we are confident that our disclosures through this line will be kept secret without leading to any sanctions on our part.

The Banks Association of Turkey’s “Ethical Principles of Banking” and Turkish Capital Markets Association’s “Ethical Principles and Codes of Conduct for Capital Market Employees” which among the ethical principles published by the sectorial occupational organizations are included in the sources we may make use of where necessary. In case of any doubts on the fact that any capital market activity conducted by our Bank is not in compliance with the Turkish Capital Markets Association’s Ethical Principles and Codes of Conduct, please inform such circumstance to spkihbar@akbank.com.
Our Responsibilities for Our Customers
**Being Honest, Transparent, Impartial and Reliable**

- Our customers are in the center of our studies, we primarily protect the customer’s benefits in customer transactions, product and service suggestions.

- Offering to our customer practicable products, services and solutions which are appropriate for their financial needs and expectations by getting to know them and listening to them in carefully and pricing these products and services fairly, transparently and at arm’s length are our priorities.

- We inform our customers explicitly, completely, accurately and in time on factors they have to be careful about our Bank’s products and services offered from all sale channels, benefits they shall provide and risks, expenses and gains which may arise in line with their rights and liabilities.

- We keep away from all kinds of behaviors and attitudes which may mean violation of the rights of our customers.

- We make clear, honest and transparent explanations to our customers. We explain the single or package products or services our customers purchase in detail, we avoid using terms they may not understand and do not use exaggerated and misleading expressions.

- We fairly state to our customers the products which we believe that they shall not be for their benefits; we clearly offer the most appropriate products and price alternatives which provide benefit for our customers.

- We do not sell or renew any service/product without clear demand and approval of our customers, and receive their approval in all kinds of transactions relevant to sale.

- We inform our customers clearly, net and accurately on the content, conditions, gains and liabilities of the organized campaigns.

- We do not give our customers promises which are hard to fulfill regarding the products and services, we do fulfill the promises we give and we do not let our reliability be undermined.

- We take necessary precautions for protecting the customer assets we’re responsible to protect.

- We are well aware that one of the foremost factors rendering our Bank an upper hand against its competition is the quality services we provide.
for our customers, and this constitutes the basis of our customer satisfaction activities.

- We adhere to the rules and principles of the premium marketing campaigns our Bank organizes to increase sales, we are well aware that manipulative transactions as product introduction without any customer demand, including customers who are not within the scope of the campaign in the campaign are against our ethical principles and behave with this conscious.

- We abstain from behaviors which may cause a conflict of interest between our customers and keep our impartiality.

- We offer equal and unbiased service to our customers without making discrimination on subjects as race, gender, religion, ethical origin, nationality, political view, age, disability, marital status, sexual preference, etc. We do not enter into discussions on these subjects.

**Performing Customer Transactions in Compliance with Legislation and Properly**

- We ensure that all our transactions are in compliance with legal and internal legislation and banking principles, and performed accurately and completely.

- We act within the framework of the designated authorizations and restrictions when performing all customer transactions and contact relevant departments of the Bank on matters exceeding our authorization level.

- We do not enter in any transaction other than the portfolio management on the name of our customers, even by proxy.

- We do not allow any missing procedures, such as a document, information or signature required to be obtained from our customers; we clearly and transparently express features and details of the products and services offered.

- We are well aware of the importance of accurate and complete entry of customer information into the system for customer satisfaction.

- We pay strict attention in preparing content of all agreements, documents and forms offered to our customers to be compatible with the process and lucid.
Customer Satisfaction Oriented Working

• We render our customers the best service, and provide utmost care to avoid customer dissatisfaction.

• We ensure our flow and procedures to be plain and simple and easily understandable for our customers.

• We are well aware that ensuring customer satisfaction in compliance with laws, official applications and business conduct is a principle.

• Where customer transactions and requests are beyond our authorizations and responsibilities or fall in areas we are not sufficiently informed on, we transfer the subject to other authorized persons or units.

• We try to settle customers’ complaints in the fastest way and take necessary measures to prevent them repeating.

• We evaluate feedback from our customers in the shortest time, and respond in the fastest and explanatory way. We position customer feedbacks as one of the most important input of our continuous development.

• While meeting our customers’ demands and wishes, we assist them to know and use their legal rights.

• We develop and diversify our products and services in a way to offer to our customers the innovations technology has brought in the most efficient way.

• We evaluate effects of our approaches and practices on the customers and markets; and make the best effort to prevent possible risks and give our customers’ benefits prominence.

• We regularly review our products and services and make updating in areas ensuring benefit for our customers.

• We offer training and improvement opportunities to our employees to ensure them to render the best service and provide them to have the highest ethical and professional standards.
Our Responsibilities for Banking and Akbankers

OUR ETHICAL PRINCIPLES
Private for Akbank; cannot be duplicated.
Displaying Attitudes and Behaviors in Compliance with Banking Profession

• We are well aware of the importance of being in compliance with ethical and professional principles in all our studies and behaviors and we take establishing these values in the bank as a goal.

• We direct the requests from our potential or existing customers to our Bank, and we ensure that our Bank benefits from business opportunities posed by such requests that will provide appropriate and added value to our Bank in accordance with laws and the policies of our Bank.

• We are aware that banking and capital markets are in a continuous change and development; we make effort to keep our knowledge and skills up to date and develop them.

• We use all resources, instruments, and fixtures of our Bank that are relevant to our job efficiently, productively and economically, and knowing that they are solely for the purposes of our work; we do not use them for our private needs.

• We represent the Bank in the best possible way both in our business life and private life and avoid attitudes and behaviors that may tarnish the reputation and image of our Bank.

• In all our correspondences, we comply with the common courtesy rules, professional business life requirements, social norms and our ethical principles.

• We take care of our clothing and personal care to suit the prestige of banking.

• We display a professional attitude in our relations with third parties, such as customers and suppliers within the framework of politeness and respect.

• We avoid all types of illegal activities which do not befit a banker, and we do not attempt to gamble or bet.

• We are aware that it is prohibited to use or to be under the influence of substances classified as a drug or illegal medicines at our work or during the performance of our work-related jobs.
• We do not come to work under the influence of alcohol and we do not drink alcohol during work hours.

• In case we are subject to a legal proceedings or sanctions for any reason, we report the situation to our superior.

• We are attentive in keeping our expenditures in proportion with our income, and we do not enter into borrower/lender relationships with our colleagues, customers, suppliers or other stakeholders, and we do not allow our relatives to do so.

• We are aware that information we convey to our Bank within the scope of the Law on Confidentiality of Personal Data have to be accurate and up to date.

Understanding Importance of Team Work

• We are well aware that working shall be more efficient when synergy is created within the team and avoid behaviors which may give harm to team work. We develop empathy in our relationship with each other, we act within the framework of politeness and respect.

• We are well aware that all units of our Bank are integral and we do not create competition between the branches before the customer.

• We are well aware that sharing our experiences in our specialization areas with other employees of our Bank shall develop our Bank.

• We support the professional development of our new, less experienced employees.

• We do not have an employee do our personal work unbefitting of his/her job description, authorization and responsibility.

• We keep our common working and living areas tidy and clean, and we are attentive in preventing disturbance of our colleagues.

• We are well aware that all Akbankers are equal in terms of race, gender, belief, religion, ethical origin, political view, age, disability, etc. without any discrimination. We do not allow our colleagues to expose to discrimination or abuse.

• We know that promotion in our Bank is based on skill and performance, and we act accordingly.

• We avoid mobbing in work place.
Compatibility with Working Hours

- We provide utmost care in terms of compliance with the business hours.
- We inform our colleagues and obtain permission from our superiors when we need to leave our work during working hours.
- We provide utmost care to protect rights of our employees in cases where overtime is required and to ensure that they take their annual leaves regularly.

Maintaining Security and Business Continuity at Business Place

- As employees, we show the utmost care in complying with all health and safety policies for the purpose of ensuring the safety of our workplace.
- We know our Business Continuity Procedures responsibilities to continue meeting market requirements and customer needs and providing business continuity in case of a fire, natural disaster, crisis or emergency situation that may disrupt business continuity and apply when necessary.
Organizing Our Relations with Professional Organizations and Other Banks

• We exchange accurate, complete and intelligible data with professional organizations within the framework of legislations and the Bank’s principles on conditions of not violating any customer or banking secrets or rules on competition.

• We do not express any positive or negative opinions about other banks and their services during the performance of our work, and we avoid such positive or negative statements, comments and sharing in all media, including social media and the internet.

• We know that it is unacceptable to intervene with the free markets and with the prices of the products and instruments in these markets, or to have any attempts to upset the competitive environment in these markets.

• In our work and activities, we behave in accordance with protecting the trust for banking sector and development of the country’s economy, and we avoid actions that may lead to unfair competition.

• In our publicity and advertisement activities, we conform to legal regulations and public moral, we act honestly and realistically and do not use statements and expressions that disparage other banks or their services or products, and we avoid all actions that may give harm to the reputation and standing of the banking profession.

• We avoid all types of practices that may lead to unfair competition in recruitment.
Our Responsibilities for Our Bank

OUR ETHICAL PRINCIPLES
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Protecting Customer Information

• We know that customer and bank information are the most important asset of our Bank; and act with the awareness and conscious of the requirement of legal and internal regulations and that violation of these requires a sanction.

• We act responsibly to ensure information security in both real and digital environment and accommodate fully to relevant regulations.

• We do not use financial and personal customer information we have obtained due to our work out of purpose and do not share with unauthorized persons.

• We know our responsibilities in maintaining confidentiality of customer information, we ensure the security of this information, and we share it only with legally authorized persons and organizations.

• We do not take the data containing customer information outside the Bank for any purpose by sending them to our personal e-mail address or by various means like USB, CD etc.

• We do not leave customer data (password, card number, mobile phone number, mother’s maiden name, etc.) or documents containing such data in unsecure environments, and we do not send them via internet, e-mail or any other unsecure means, even to the customers themselves.

• We do not carry the personal and financial information of the customers out of the Bank for any reason whatsoever.

• We receive approval and consent of customers whose personal data is provided through digital or physical channels and inform the customers clearly and explicitly on data providing and processing.

• In all our practices, we display an approach ensuring completeness, accuracy and currency of customer data and increasing data quality.
Protecting Bank Information

• We do not leave the information which we have or which we learned due to our profession on unsecure media, and we do not share it with unauthorized persons inside or outside the Bank in writing, verbally or via electronic devices or instruments for whatsoever purposes.

• We know that the projects, technical infrastructure, regulations, etc. which we have developed based on our capacity are owned by the bank, and we do not take such works outside the Bank by whatsoever means during our employment or after our employment is terminated.

• We do not cause any situations that may lead to any speculation or negative assessment regarding our position.

• We do not carry the information, documents or correspondences having the quality of bank secrets or commercial secret out of the Bank for any reason whatsoever; and do not disclose the same to third persons other than those legally authorized.

• We do not give documents like display images, forms, contracts, etc. of our Bank’s applications to any person other than our customers or other employees of our Bank.

• We do not share our personal benefits which should only be known by us with other people from our outside the Bank.

• We know the importance of digital security principles in our relations with third parties and behave accordingly.

Protecting Our Stakeholders’ Information

• We give importance to the confidentiality of the personal data of our employees and work information and we take measures to prevent access to such information by unauthorized persons.

• We know that information on our suppliers, projects, business partners and other stakeholders are private and confidential, and we do not share such information with unauthorized persons.

• We sign nondisclosure agreements with third parties which confidential information and customer data at our Bank are shared with on protection of data and ensuring confidentiality and follow the provisions of these agreements.
Compliance with Laws and Regulations

• We are well aware that banking is a sector subject to many laws and regulations and we have to be in compliance with all relevant laws and regulations completely.

• As per our Corporate Policy for Anti-Money Laundering and Combating the Financing of Terrorism; we are aware of our legal obligations and social responsibility in combating money laundering, financing of terrorism, financing of initiatives for drugs and gambling and other financial crimes.

• We immediately report to the harmonization unit of our Bank within required confidentiality in case any transaction requested from us and wished to be performed at our bank has features to arise suspect in terms of laundering.

• We do not compromise on our responsibilities for any customer relation and we act in compliance with the procedures stated in the Customer Acceptance Policy.

• We know that the records and information owned, collected, used, managed by our Bank should be accurate and complete and that we are responsible for the integrity and storage of information, reports and records that are under our control.

• In our relations with public authorities, we act in line with the principles of integrity, accountability and transparency, and we take care in delivering the information, documents and records requested from us for control and supervision purposes under the laws and regulations accurately, completely and in a timely manner.

Developing Risk Perception and Protecting from Risks

• We are well aware that one of the foremost elements of banking is efficient risk management. We assess the possible results of our transactions and the risks we have undertaken. We take care our activities to be in compliance with our Bank’s general risk policies and risk management principles.

• We know that establishing and managing an efficient internal control system for the management of risks is among our primary
Responsibilities, and we fulfill the control activities under our responsibility efficiently, without causing any weakness in the control.

• We support the internal or external audit studies at our branch, region, unit or department in maintaining their activities on a healthy footing, and we act in full cooperation with them.

• We act very responsibly in avoiding access to web sites which may pose a risk in terms of the bank within the framework of Our Digital Security Principles.

• We know that passwords used in practices of our Bank are private and within the scope of very confidential data, and we don’t share it with anyone including our colleagues and never keep it in written to allow others to have it.

• While using computer software and hardware, we pursue the benefit of the Bank and do not load licensed or unlicensed programs to computers; we do not use or copy unauthorized programs.

• We use applications as internet access, electronic post addresses and communicator allocated for our use within the framework of the determined information security policies.

• We do not share confidential and sensitive information in any interview or correspondence between the Bank and the customer.

• We keep our desks and working areas to keep information under protection properly.

Avoiding Insider Trading

• We know that the use of undisclosed information which may affect the value of capital markets instruments for the purpose of deriving benefits for ourselves or third persons (insider trading) which disrupts the equal opportunities principle is against legal regulations.

• We pay special attention on insider trading issues during investing the stocks and investment instruments of our Bank, our customers, our suppliers, or other parties which we may be informed about due to our position, and act in compliance with legal provisions as well as the rules set by our Bank.
Showing Attention in Our Expenditures Relevant to Our Business

• We always observe the Bank’s benefit in all expenditures and spending for the Bank, and we comply with the benefit-cost and saving principles.

• We declare our spending and expenditures due to various assignments correctly and in time in accordance with our Bank’s principles.

Arranging Our Personal Investments and Financial Transactions

• We avoid banking transactions such as providing guarantees, opening joint-accounts with customers, suppliers and other stakeholders.

• We are attentive in avoiding interruption of working hours or services for our customers while doing our personal banking transactions.

• We direct our own cash transactions such as collection or payment, or those of our intimate friends and relatives to other Bank employees.

• We do not enter into transactions on products and services in which we act as decision-maker in terms of their pricing and approval in our own favor or in favor of our first-degree relatives, and we do not allow a pricing different from the effective pricing for such products and services.

• We show attention for our investments to be medium and long term, and avoid speculative or high-risk investments and perform our derivative transactions to be in compliance with legislation.

• We do not manage portfolios, use credit or conduct transactions by proxy at our Bank in the name and account of others, including our first-degree relatives.
Our Responsibilities Towards Society

OUR ETHICAL PRINCIPLES
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Internalizing Human Rights

• As stated in the United Nations Universal Declaration of Human Rights, European Convention on Human Rights and our Constitution every individual has basic human rights as right to live, to be free, to be secure, to be free from torture and ill-treatment, to have equal and fair trial right, have confidentiality in private life, to have freedom of movement and residence, to get married, to own property, to think and make remarks, to participate in public administration through universal and equal suffrage, to have equal access to public services, to work, rest, have paid leave and social security under fair and equal conditions, to have fair and equal education, to participate in and benefit from scientific, artistic and cultural activities, and freedom of faith and conscience. In this respect, respect for human rights is our first priority.

• We do not accept forced labor practices and child employment at our stakeholders.

Ensuring Social Benefit

• As an extension of the sustainable development and social participation principle, we implement social participation practices in line with the requirements and requests of the physical and social environment we are a part of, and we develop social responsibility projects in areas like culture, art, education, etc.

Protection of Environment

• We conduct studies on productive use of natural resources and minimization of our waste arising from our processes.

• We are in full compliance with all laws and regulations on the environment. We promote increased sensitivity among our stakeholders on this subject. We request the enterprises we work with to take the required measures on the environment.

• We conduct studies to support the recycling and reuse activities among our employees and other stakeholders, and ensure developing awareness on this subject.
• We support carbon transparency policies through international cooperation to ensure reduction of greenhouse gas emissions and protecting biological diversity.

• In selection of products and services provided from suppliers, we prefer providers working with operational / production systems which are sensitive to society and the environment.

Compatibility with Decent Society, Anti-Corruption and Anti-Bribery Policy

• During our relationship with all relevant parties, we clearly state that bribe and corruption of all kinds is in no way acceptable by our Bank.

• We know that the objective of the anti-corruption and anti-bribery policy is complying with the laws and regulations against bribery and corruption in force in all the countries where Akbank T.A.Ş. is carrying out its activity, ethics and professional principles and universal rules and we take the necessary care in compliance with this policy.

• We know that our anti-corruption and anti-bribery policy covers all Bank employees including the board of directors, our affiliated companies and subsidiaries and their employees, companies and their employees from which/whom we get external service including the supporting services regulated with legal legislation, persons and corporations serving in the name of the Bank including suppliers, consultants, lawyers and external auditors.

• We are careful, determinant and noncompromising in compliance with the decent society goal against these attempts.
Our Business Relations

OUR ETHICAL PRINCIPLES
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What is Conflict of Interest?

The employees are obliged to avoid all kinds of transactions and relations for their personal benefits which may be harmful for the employer. Conflict of interest may arise in case of violating this relation based on trust. Conflict of interest is inconsistency of the employee’s personal interest and the Bank’s and the customer’s interest or a perception arising in this direction. Accordingly, we evaluate each of our transaction and behavior’s possibility of perceiving as conflict of interest by others, and in case perceived as such, whether our Bank and us shall be stuck in a difficult situation, whether it shall affect our objectivity, whether it shall be perceived as such even it does not affect, and whether it affects our Bank, suppliers and other stakeholders negatively.
Arranging Our Off-Duty Activities

• We do not take part in any commercial, industrial, etc. activities other than the Bank, and we devote all our work to the Bank.

• We know that taking part in group companies which the Bank is included in or in any organization other than the Bank can be possible only by the decision, instruction and permission of the Board of Directors of the Bank.

• We can by no means act as an expert by using our professional knowledge and title without the approval of the Bank’s top management.

• We cannot enter into competition against our Bank by using a corporate opportunity to our own advantage while representing our Bank.

Arranging Our Business Relations with the Parties

• We participate in all kinds of workshops, conferences, panels, trainings, seminars, fairs, or invitations and organizations with similar name and scope which are organized, sponsored or all or part of the participation, travelling or accommodation expenses of which are offered to be covered by the companies and institutions supplying goods and services, on condition that the expenses are covered by the Bank or our personal expenditures are covered by us in person and this is documented by us. For permissions to be obtained for such visits to be made abroad, we also give information regarding the participation costs needed in this scope.

• We avoid behaviors like exchanging - outside the ordinary customer relationship - profit-oriented goods or services with or seeking employment for relatives from persons or organizations having a business relationship with the Bank.

• We take necessary measures to avoid suppliers or customers to affect the purchase decisions at our Bank. We prevent the actual and perceived conflicts of interest, knowing that the purchase decision is a sensitive process.
• We do not form relationships with customers which may be perceived as the existence of a relationship based on self-interest.

• We definitely refuse all offers made to take advantage for ourselves or for our relatives while we’re fulfilling our duties, and we report this situation to the internal authorized positions and executives of our Bank.

Arranging Our Personal Relations

• We do not buy, for our own name or for the name of our relatives, any movable-immovable goods disposed by our Bank or owned by companies under proceedings.

• We prefer to receive the personal financial services for ourselves and for our relatives from our Bank without requesting any favor or privileged practice.

• We do not by any means open any joint accounts, make banking transactions, or enter into a guarantee relationship with our customers excluding our first-degree relatives.

• We do not take part in the work processes (credit allocation, recruitment, etc.) as a decision maker which may result in offering an advantage to our relatives or intimate friends.

Showing Attention in Gift Acceptance

• We do not accept any gifts from our customers, suppliers or other persons and organizations, except those gifts have a very low or a symbolic value. In particular, we do not accept the gifts which will bear an impression that will lead to a compromise by us regarding the decisions we are to take in respect with business.
Political Activities, Non-governmental Organizations and Pecuniary Contributions

• We do not accept any active positions in any political party, nor in any extensions thereof, and we avoid any behavior that may mean financial support of the same.

• We may be assigned to professional organizations as the Chamber of Commerce, Stock Exchange, etc. or non-profit associations, foundations, cooperatives, etc., however, we do not use the name of our Bank, its opportunities and our position at the Bank during such assignment.

• We definitely do not request any donations or similar demands from our customers or from other employees, even in the name of nonprofit organizations or various other associations.

• We know that the approval of authorized authorities of our Bank is required for any aid or donations to be made in the name of our Bank.

• We take care to ensure that our personal donations to charity organizations are secret, voluntary, and have no association with our work.
Our Relations with Media and External Institutions
Protecting Value of Akbank Brand

• We know that the “Akbank” brand is one of the most valuable assets of our Bank.

• We are informed about the rules and practices regarding the use of “Akbank” brand and all other brands owned by our Bank, and as a general rule, we do not use the name, logotype or trademark of our Bank outside our work.

• We do not cause loss of reputation to our Bank or the “Akbank” brand with our working method and behaviors.

• Our priority in our services is maintaining our transparent, reliable, fair and customer’s benefit oriented services we offer to our customers and communication we have established with our customers.

Showing Attention in Our Sharing at Written, Visual and Social Media

• We reply information and interview requests on our jobs at the Bank coming from press, TV and other media institutions after receiving permission from the unit or person authorized by the Bank.

• In social media use, we consider our “Akbanker” identity and avoid behaviors insulting or discrediting our Bank, our customers, our stakeholders, our rivals and other financial institutions.

• We maintain our equity and impartial personality without distinction on subjects as race, gender, belief, religion, ethnic origin, nationality, political opinion, age, disability, marital status, sexual orientation and avoid discussions on these subjects in social media channels.

• We do not make sharing in social media about markets and economic developments which may guide and/or impress internet users by using our Bank title.

• In social media use, we behave according to general ceremonies, social norms, human, animal and environment rights, basic values of democracy and ethical principles.

• We pay attention to confidentiality of personal data of the customers and avoid sharing written and visual contents which may violate them.
• We act in compliance with regulations as copyrights, trade secrets, fair use and competition rules; we do not make sharing contrary to laws and legislations or involving crime factors.

• We do not criticize Bank policies and practices through social media, we do not make negative sharing about the requirements of the job, working environment and our team-mates.

• We do not make any statements involving political opinions on social media channels.

• We pay attention to avoid giving any information relevant to our Bank when writing a blog. We do not mention Akbank and sub-brands of Akbank in articles and/or comments.

**Showing Attention in Our Relations with External Institutions and Persons**

• We do not declare any opinion in the name of our Bank and we do not share the confidential information of our Bank without the knowledge and approval of the authorized unit at organizations such as conferences, panels, seminars, etc. which we participate in due to our position at the Bank or as a part of our training by the Bank.

• We do not share confidential information of our Bank at organizations we attend outside working hours, such as training, courses, conferences, seminars, panels, etc. either, and we do not let our personal views or opinions we declare during our interviews and speeches to be perceived as if they belong to our Bank.
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