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1. GENERAL INFORMATION

1.1 PURPOSE

The purpose of Anti-Bribery and Anti-Corruption Policy, Albaraka Turk Participation Bank (the “Bank”) is strictly committed to and in compliance with the legal regulations against bribery, corruption and similar economic crimes, ethical and professional requirements and principles and the universal rules.

1.2 COVERAGE

This Policy covers Board of Directors, shareholders, employees, executives, customers of Albaraka Turk Participation Bank (the “Bank”) and persons and organizations acting on behalf of the Bank and providing services to Bank, including companies, suppliers, consultants, external auditors and representatives from whom the Bank purchases external services.

This Policy is an integral part of other internal regulations, including Albaraka Turk Conflict of Interest Policy, Ethical Principles and the Bank's Personnel Regulations, adopted by the Board of Directors and all employees as well as Bank's legislation and other legal regulations.

1.3 DEFINITIONS

1.3.1 Bribery

1.3.1.1Promising, proposing, or providing an unfair benefit to a person who is employed in any capacity or who is a manager, directly or indirectly, in favor of him/her or another person, in order for him/her to act in violation of his/her duty or to avoid acting,

1.3.1.2It refers to situations where a person working in any capacity or in a managerial position, either directly or indirectly, requests or accepts an unjust benefit for themselves or another person, with the aim of acting in a manner that violates their duties or refraining from acting in such a manner.

1.3.2 Corruption

1.3.2.1Abuse of the power granted directly or indirectly for personal benefit and unfair profit.

1.4 AUTHORITIES AND RESPONSIBILITIES

1.4.1 Obligations of the Bank

1.4.1.1In order to ensure the continuity of the current sense of dignity and reliability of the banking profession in the society, to develop and maintain this sense of dignity and reliability, which is called professional dignity, and to maintain stability and trust in the banking sector, the Bank has adopted the fight against laundering assets derived from crime, bribery, corruption and similar economic crimes as an important principle within the framework of international norms and provisions of national legislations.

1.4.1.2The Bank is aware that it must comply with all legal regulations in its transactions in both domestic and foreign countries in which it operates.

1.4.1.3The Bank ensures that the necessary actions are taken by classifying those related to bribery, corruption and similar economic crimes by meticulously evaluating the determinations in the control and auditing activities carried out by the units within the scope of Internal Systems and the notifications received through the Hotline.

1.4.1.4The Bank imposes the most severe disciplinary sanction stipulated in its Personnel Regulations, namely termination of employment, for the offenses of accepting or offering bribes. Accordingly, the Bank ensures that employees who refuse to accept or offer bribes will not be subject to penalties or any other adverse consequences.

1.4.1.5The Bank ensures that all stakeholders, including the public, are informed on the Bank's website in a timely, accurate, complete, comprehensible and simultaneous manner regarding the implementation and violation of this Policy in line with Corporate Governance Principles and Sustainability.

1.4.2 Obligations of Employees

1.4.2.1All Bank employees; are obliged to comply with this Policy and Bank's internal regulations and all applicable legal regulations against bribery, corruption and similar economic crimes.

1.4.2.2All employees are obliged to notify a suspicious situation or activity in relation to bribery and corruption and similar economic crimes related to bank activities or other processes of Bank personnel, customers and third parties, both through the Internal Control Department, the Internal Audit Department, the Legislation and Compliance Department, and through the methods set out in Albaraka Hotline Procedure.

1.4.3 Obligations of Persons and Organizations Acting on Behalf of The Bank And Providing Services to The Bank

1.4.3.1It is essential that the persons and organizations acting on behalf of the Bank or providing services to the Bank, including companies, suppliers, consultants, external auditors and representatives from whom the Bank purchases external services, comply with legal regulations and legal regulations against bribery, corruption and similar economic crimes.

2. IMPLEMENTATION

2.1 BASIC PRINCIPLES

i. The Bank has adopted “zero tolerance” policy against bribery and corruption with the Anti-Bribery and Anti-Corruption Policy which it considers as an integral part of its other policies and legislation.

ii. The Bank is opposed to corruption, bribery, fraud, embezzlement and all other illegal activities and is committed to compliance with applicable laws, regulations and principles.

iii. Giving or accepting bribes in any way under any name such as cash, money, profits, tips and contributions, etc. is strictly prohibited.

2.2 MAIN RISK AREAS FOR THE ACTS OF BRIBERY AND CORRUPTION

2.2.1 Gifts and Entertainment

2.2.1.1Employees can not obtain all the gifts and bribes that cause them to act in a particular manner in relation to Bank's activities. It is possible to organize or participate in reciprocal gifts, regular business dinners, programs and events involving food and accommodation with customers and suppliers, provided that they are designated by the Headquarters of the Bank.

2.2.2 Companies and Business Partners Providing External Services

2.2.2.1The Bank does not work with persons and organizations with adverse intelligence, particularly on bribery, corruption and similar economic crimes. Companies and business partners providing external services are obliged to comply with the principles of this Policy and other relevant regulations. Business relations with individuals and organizations that do not comply with the related principles and other relevant regulations are terminated.

2.2.2.2 All third-party service providers associated with Bank must be screened against sanctions list before receiving services and committing to any obligation by the Bank.

Service providers are legal entities or individuals that the Bank have contractual relationship with to supply goods or services. These service providers must be screened on the Sanctions lists during the identification phase. To perform the screening, service provider distinctive information must be provided.

The Bank cannot establish or maintain a service procurement relationship with any service provider included in the sanction lists, or with persons resident or established in a sanctioned country, or whose shareholders or controlling parties are resident in the sanctioned countries.

2.2.3 Facilitation Payments

2.2.3.1Persons and organizations covered by the policy are not permitted to offer and make facilitation payments in order to secure or expedite a transaction or process involving government agencies.

2.2.4 Abuse of Title or Position

2.2.4.1Employees are prohibited from conducting any unlawful transaction in order to obtain an unfair benefit in favor of themselves or another person or organization while performing their duties. Employees shall not use the duties and powers assigned to them in order to provide personal benefits, in favor of themselves, their relatives or any other third parties and institutions, in any manner that may result in cause unjustified benefit or damage to the Bank or the customers.

2.2.4.2The employees must respect the confidentiality of the information obtained during the performance of their duties, not disclose such information to third parties without proper and specific authorization and not use them for the benefit of himself/herself or third parties.

2.2.4.3Employee is responsible for complying with contracts, commitments, etc. documents he/she signed with the Bank, the Conflict of Interest Policy, Personnel Regulation, all internal regulations of the Bank and the provisions of the national and international law in force.

2.2.5 Donations and Sponsorships

2.2.5.1The Bank carries out in-kind and cash donation and aid activities; however, it excludes and prohibits political donations from the scope of such activities.

2.2.5.2Bank's donation or sponsorship activities must be compatible with the legislation and the regulations set out in Bank's Donation and Aid Policy.

2.2.5.3In the event of making donations to individuals or regulated charitable organizations, “Donation and Aid Policy” and related procedures and Compliance Head/Deputy Head approval must be obtained before a donation can be made. Information regarding these organizations or individuals' beneficiaries must be obtained for screening on the Sanction lists in "Sanctions Policy".

2.3 POLICY VIOLATIONS AND SANCTIONS

2.3.1.1In cases of violation of this Policy by employees, various sanctions and disciplinary punishments, including the termination of the business contract, are applied.

2.3.1.2Employees who report acts or attempts that contradict the principles of this Policy in good faith by acting within the principles of honesty and transparency shall not be subject to any punishment and/or ill-treatment accordingly.

2.3.1.3Upon the fulfilment of legal conditions, the judicial authorities shall be notified.

2.4 ANTI-CORRUPTION AND ANTI-BRIBERY SYSTEMS

2.4.1.1The Bank carries out risk monitoring and auditing/reporting activities through the units within the body of "Internal Systems" to protect and strengthen its national and international reputation and to fight against corruption and bribery in order to maintain its customers and personnel quality.

2.4.1.2The Bank provides the opportunity for reporting illegal transactions, both through the Internal Control Department, Internal Audit Department and Legislation and Compliance Department, as well as through the Hotline.

2.4.1.3The Bank has also established our Bank's Policy on Compliance with the Obligations for the Prevention of Laundering Proceeds of Crime and Financing of Terrorism (for the most effective fight) on the prevention of laundering proceeds of crime and financing of terrorism.

2.5 TRAINING

2.5.1.1The Bank provides training to its employees to enable them to become more aware of the fight against bribery, corruption and other economic crimes.

2.5.1.2This Policy is communicated to all employees through Bank's communication channels and is kept accessible to all employees.

2.6 REVIEW

2.6.1.1This policy is evaluated in terms of compliance with current conditions due to organizational changes, business conditions, legal and technical regulations etc., reviewed once a year and updated as necessary.

2.6.1.2Changes in the policy shall take effect upon the approval of the General Manager. The General Manager informs the Board of Directors about the changes. This policy and the changes made are announced on the Bank's website.

2.7 ENFORCEMENT

This Policy shall enter into force following the approval of the Board of Directors.