

## ANTI-BRIBERY & CORRUPTION POLICY

**Odea Bank Anonim Şirketi** (hereinafter referred to as “**Odeabank**” or the “**Bank**”) is committed to conducting all its activities in accordance with ethical values, honesty, transparency, and accountability principles. In line with this commitment, it adopts a “**zero tolerance**” policy towards bribery and corruption and demonstrates a strong stance against such activities. The Bank expects all employees, executives, and business partners to act within this framework.

The Bank is aware that bribery and corruption not only lead to legal consequences but also undermine the credibility of the financial system, shake market confidence, negatively impact economic growth, and harm corporate reputation. Therefore, the Bank considers taking effective measures against bribery and corruption, maintaining high ethical standards in its processes, and establishing a fair and transparent working environment for all stakeholders as a fundamental responsibility.

For the successful development and implementation of the Anti-Bribery and Anti-Corruption framework, the Bank has adopted and incorporated the following fundamental principles. In line with its commitment to preventing bribery and corruption, the Bank adheres to these principles at all levels, ensuring that its governance and corporate culture align with them.

Determined to uphold a culture in which bribery and corruption are unacceptable under any circumstances, the Bank aims to clearly communicate its zero-tolerance policy to all employees and relevant third parties.

To ensure compliance with legal regulations and ethical principles, the Bank has established the necessary processes, systems, and organizations for combating corruption and bribery. In this context, relevant duties and responsibilities have been clearly assigned to employees. Accordingly, the following matters must be fulfilled:

- Establishing policies and strategies, obtaining approval from the Board of Directors, and implementing them;
- Ensuring an ethical, secure, legally compliant, and controlled working environment through the Board of Directors;
- Assessing risks and establishing necessary control mechanisms in accordance with the principles set by the Board of Directors, as overseen by senior management;
- Evaluating whether activities are carried out in compliance with legal regulations within the scope of their responsibilities by the Compliance Unit, Risk Management Unit, and Internal Audit Unit;
- Defining and operating mechanisms for reporting, investigation, and enforcement in cases of non-compliance with policies, rules, and regulations

The Anti-Bribery and Anti-Corruption Policy has been established to prevent **bribery, corruption, conflicts of interest, unethical benefit acquisition, and improper business relationships**. It applies to the following parties and activities:

## Who does it apply to?

- All employees of the Bank
- Members of the Board of Directors and Senior Management
- Clients, Business Partners, Suppliers, Consultants, Intermediaries, and other Third Parties

## What activities does it cover?

- All business processes and activities of the Bank
- Agreements, partnerships, and contracts with third parties
- Gifts, hospitality, donations, and sponsorship processes
- Conflicts of interest and attempts to gain personal benefits
- Relationships with government officials, public agencies, or private sector representatives

This policy has been established to ensure full compliance with Turkish legislation (Turkish Penal Code, Banking Law, Law on the Prevention of Laundering Proceeds of Crime) and international regulations (U.S. Foreign Corrupt Practices Act, UK Bribery Act, OECD Anti-Bribery Convention, and FATF Recommendations).

Our Bank expects its employees and business partners to act in accordance with laws and ethical rules, adopt anti-corruption standards, and report any suspicious activities. Within this framework, violations of our anti-bribery and anti-corruption policy may result in disciplinary actions, contract termination, and legal sanctions. Odeabank continuously evaluates bribery and corruption risks and updates its policies and procedures accordingly.