

ETHICAL PRINCIPLES OF OUR BANK

All the personnel working in our bank are required to act within the principles listed below.

Additionally, within our understanding of Corporate governance, the "Banking Code of Ethics" issued by the Banks Association of Turkey has been accepted and is being implemented by our Bank and in all the business and operations in our bank, these principles are required to be adhered to.

- **Confidentiality of Information**

The personnel is responsible for the information security of the bank and the unit where he/she works. He/she cannot share any information **or secret** related to the Bank directly or indirectly with third parties and institutions without the Bank's approval and except with the Official Institutions of the Republic of Turkey.

The personnel cannot disclose the secrets of his customers which he/she has become aware of due to his/her duty to anyone other than the bodies authorized explicitly by law in this regard.

This information is in the responsibility of the employee and he/she has to avoid behaviours that will pose a vulnerability, abuse or a risk, take the necessary measures in case of detection of such a situation and notify the relevant department. For the security of the confidential information, the papers within the working environment should be collected when the business hours end or when not worked. Confidential/private information should not be kept in places which are open to general public on the network. Employees must act with the awareness that they will be responsible directly for the information and documents that will be lost or disclosed because of their failure of showing the necessary attention.

Confidentiality principle is essential in the remunerations and other monetary benefits. The personnel cannot share their own salary information with the other personnel and cannot have information about the other personnel's remunerations and cannot ask questions in this regard. Otherwise a disciplinary investigation may be opened for him/her.

- **Fulfilling the Duty**

The personnel is expected to fulfil his/her duties within the framework of the legislation, internal regulations and the service contract signed mutually, in a timely and complete manner, carefully and attentively. The personnel should adopt an attitude protecting the benefits of bank staff while performing the tasks, avoiding any behaviour that could be harmful to the bank and to himself/herself and should have accountability with regard to the tasks he/she undertakes.

The personnel should lead the potential customers primarily to his/her bank, should not cause a loss of reputation of the bank in its works and behaviours. The personnel should provide impartial and fair service to the customers who are provided with the

same service and should inform them about the benefits and risks of the products and services offered to them.

- **Unfair Benefitting**

The employee should not engage in behaviours that will directly or indirectly provide benefit or give promise to provide benefit to himself/herself or third persons by abusing his/her duties and powers.

The personnel should not obtain interests from both his work environment and the facilities of his/her customers, should refuse the offers for providing him/her benefits immediately and should communicate these to the competent authorities and supervisors.

The personnel should not enter into relationships with the customers who conflict with the ethical principles such as debt-credit, surety and opening a joint account.

The personnel must fully adhere to the legal regulations established in relation to the insider trading and cannot use the information that he/she has learned during carrying out its duties to provide benefits to himself or third parties.

- **Working Externally**

The employee cannot engage in works which require them to be considered as traders or shopkeepers, directly or indirectly. Cannot work as paid or free in any commercial business of real and legal persons without written consent from the bank.

The personnel cannot take part in any private and public organization except associations, foundations and similar places without the consent of the bank

- **Clubs and Association Membership**

Employees can be members of the associations and clubs for social, cultural and environmental activities. These associations and clubs should not be in any way discriminatory, religious or in areas in contrary to the benefit of society and the conducts which will cause a bad reputation for our bank need to be avoided.

- **Assignment to another Duty**

In situations where necessitated by the task and staff organisation, an employee can be assigned temporarily or permanently to another department/unit with another title, however without any decrease in seniority, wages and other social benefits.

- **Handover**

The employee whose duty in his position ends due to transfer, dismissal or resignation shall deliver the books, documents, money, tools and equipment and all kinds of value which he/she had to keep, at the time of leave with a written minutes. This principle also applies to those who are temporarily assigned to other duties. Furthermore, the car delivered to the branch should be transferred, in case of leave of the Managing

Director to the operations officer of the branch and in case of leave of the Headquarters personnel, to the Administrative Affairs Center against a signature.

- **Protection of Information, Documents and Work Environment**

The money and fixtures of the bank and the money and other valuables belonging to employee should not be left in the place of duty in an open and unsafe manner. Tools, equipment and office machines should be used carefully by preserving the working environment provided carefully. The personnel should not use the assets and resources belonging to the bank inefficiently and out of purpose. The personnel cannot install any software or application program to the personal computers delivered to him/her without the consent of the Bank's Technology Center. The personnel is personally responsible for the damages caused by pirated software on personal computers delivered to him.

In addition, bank employee should not use the items included in the bank inventory for personal purposes, should strictly avoid the behaviours abusing the bank's resources, reputation and image.

- **Password Privacy**

All personnel are directly responsible for the confidentiality of the user passwords for data processing programs he/she uses and are obliged to sign the **Personnel Regulation, Job Description, Ethics of banking profession, Wage Privacy and Password Commitment Letter (Annex: 2)** during recruitment.

- **Behaviour and Appearance**

The personnel should not engage in any conduct in contrary to the principles of justice, integrity, honesty, reliability and social responsibility. The personnel should ensure collaboration towards common goals through establishing a courteous and attentive communication with other employees while performing his/her duties. In the work environment, the employee should be in a style of clothing that is clean, attentive and appropriate to his/her professional career; be friendly, interested and respectful to everyone. The employee should represent the Bank which is a trust institution in the best way with his/her behaviour and external appearance. This principle is extremely important in terms of improving the Bank customer relationships, enhancing the reputation of our Bank and must be implemented rigorously.

Our male personnel;

- Must absolutely shave every business day, hair should be properly cut and no beard should be grown.
- Suits and/or matching coat and pants should be worn. Shoes should always be painted, ties must absolutely be worn at the branches. Head Office staff, however, shall be allowed not to put on tie, except for official meetings/customer visit/branch visits.

- Mainly black, navy, dark gray tones should be preferred in clothing. Complementary elements such as shirts, socks etc. should be selected accordingly.

Our female personnel;

- Skirt/jacket or trouser/jacket suits in colours suitable for the banking norms, should be preferred.
- Extremes should be avoided in all kinds of accessories and makeup. In this context; headscarves, turbans, berets, hats, extreme mini, very long and abundant skirts, shorts, short-skirts, halter blouse, t-shirt, stretch jeans, etc. outfits revealing the lines, fluorescent colours and intricate patterns, slippers, sandals, patterned socks should not be used.
- Everybody will serve with their heads open and the hair will be clean, proper and well-maintained so as to suit the working environment.

- **Notification in Case of Absence**

The employee must call and inform his/her managers in case of sickness, accident and other emergencies. Relevant provisions of the Labour Law are applied for individuals who do not document with the report of Social Security Administration, the situation of being absent for consecutive two days or in a business day following a holiday for twice a month or a total of 3 business days within a month, without the permission of the employer or without documenting with a health report.

- **Responsibility of Leaving the Place of Duty and Delegation of Powers**

It is essential for an employee to be at his location within the working hours. The employee who leaves his/her place of duty for any reason should inform his/her manager to whom he/she is affiliated of the place where he/she goes to or his/her colleague next to him/her to be forwarded to his/her manager. Thus, confusions and waste of time are prevented. The employee who should be outside the bank due to his/her duty should inform his/her manager about the place he/she goes and the hours he/she will spend outside.

The personnel with signature and/or approval authority should inform the person who will substitute him/her to prevent interruption of operations, in cases that he/she will not be present in the place of duty for situations such as use of leave, meetings, seminars, customer visits etc. and a definition of delegation should be made on our Banking system and/or the Bank's Intranet System.

- **Phone Calls and Visitors**

In phone calls made due to duties, the duration of calls should be kept short, and private and long phone calls should not be made except in emergencies. The phone calls made with the branch/GM should be done over the network line. Special visitors should not be accepted during working hours. Actions that will cause disrupt of the works; that will disrupt daily working order, business discipline should be avoided.

- **Ensuring Security**

To help the security measures in the bank building, the employees who will be working on the weekend need to make the required notification to the Security Unit in advance. In addition, for the visitors who will come during working hours, a notice is required to be given to the Reception in advance.

- **Personal Information Change**

The changes in the personal information of the employees in the documents when they provided during their recruitment such as marital status, address and phone number shall be reported to the Human Resources Department Remuneration and Performance Management Unit primarily by e-mail no later than 3 days following the date of occurrence. Then the following procedures are performed:**In case of Marriage/Divorce:** Photocopy of the new ID card of the personnel whose marital status/surname has changed, photocopy of marriage certificate/Extract of the Civil Registry Record and the original Family Status Declaration form refilled by him/her, shall be sent to the Remuneration and Performance Management Unit. **Changes in the Address and Phone Number:** The personnel shall give information to the Human Resources Department Remuneration and Performance Management Unit by e-mail.

Responsibility for problems that may arise from failure of reporting, on time, the personal information to the Remuneration and Performance Management Unit, shall be borne by the persons concerned. In this case, the current bank records shall prevail.

- **Notification**

The employee should notify the Departments of the Head office, Internal Audit Department, Risk Management Department and Internal Control and Compliance Department of the practices incompatible with the professional principles and the activities, which he/she has faced due to duty and which are contrary to the bank policies or which are illegal, issues and behaviours deemed suspicious in accordance with usual practices. The notifications to be made should be in writing except the emergencies, not to be related with the character of the employee and to only depend on transactions and events.

- **Gifts**

Employee and their spouses and children cannot accept gifts from existing or potential customers or private or legal persons who are likely to enter into business relationships with the bank. All kinds of contributions such as borrowing money, getting a charged service for free are included in the concept of self-interest. However, the exceptions for the situation of accepting a gift by the employee include:

- a) Gifts given in the New Year and holidays and with no significant financial value,
- b) Catering and hospitality offered during the visits made on behalf of the Bank,
- c) Foods and catering arising from civilized business relations.

It is essential that the gifts given for purposes specified above, should have significant material value.

- **Harassment**

Harassment by an employee to another employee based on the gender, race, religion, nationality, age, sexual preference, disability or other characteristics is absolutely an unacceptable behaviour. Those exposed to such behaviour should report the situation to their directors and where it is not possible to inform their directors, they should report to the Human Resources Department Recruitment and Talent Management Unit or the Internal Audit Department without delay. The directors are also responsible to report the harassment incidents reported to themselves to the Recruitment and Talent Management Unit. The issue shall be investigated in a confidential manner and disciplinary penalties shall be applied for those who are engaged in the harassment.

- **Using Internet**

Our Bank's internet and intranet systems are for transactions, communication and researches relating to the business. Internet should not be used for special purposes during working hours.

In addition, game sites such as luck/gambling/betting websites, obscene, pornographic websites, websites for religious propaganda and terror must not be used. Necessary disciplinary sanctions shall be applied in case of their use.

All personnel should be aware of that they represent the Bank when using the Internet and social media. On the social media, no opinion must be given that will leave ICBC Turkey in the lurch and that will discredit it.

- **People from whom Debt will not be Received**

Bank employees and their family members cannot receive debt from customers and the individuals or organizations who are selling goods and services to the bank. In order to not to damage the relationship, no debtor-creditor relationship should be established with the people internal to the bank.

- **Work Place**

Headquarters and Branch personnel are obliged to carry the staff identity card given to him/her by the bank when he/she is at the place of duty and the Headquarters staff must use their own card during their entry into and exit from the building.

Smoking is forbidden in the headquarters building and branch locations due to the relevant law.