

Akbank T.A.Ş.

# SUPPLIER CODE OF CONDUCT

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## 1. INTRODUCTION

While Akbank carries out its activities through its Head Office and regional offices throughout the country, it has a strong distribution network with widespread branches in the country.

Our supplier ecosystem, which we have created and continuously developed in order to meet the needs of our bank, which changes in line with the developing market conditions, is of critical importance for our bank.

The main target in Akbank purchasing activities is in line with our bank's sustainability policy; to maximize the contribution and value provided by effective, cost-sensitive and dynamic operations. With this purpose, one of our main goals is to establish value-creating, transparent, sustainable, reliable and quality business relationships with our suppliers.

Being the first Turkish bank to sign the UN Global Compact in 2007, Akbank shares its performance in this field with all its stakeholders every year, with the Akbank Sustainability Report (GRI) published since 2009.

In this context, Akbank;

- Attaches importance to the implementation of all the elements in the United Nations Global Compact, also by its suppliers,
- Provides opportunities for suppliers working with systems that are more sensitive to society and the environment in the supply of products and services,
- Strives to evaluate the work and working conditions of third-party employees, within the scope of their commitments to international organizations,
- Aims to provide equal opportunities for our employees and stakeholders, to support disadvantaged groups, to raise awareness for an inclusive culture and to determine policies that support its survival, within the scope of its sustainability vision and strategies.

Akbank acts in accordance with its published policies and ethical rules in all purchasing processes. It also expects its suppliers to comply with the ethical, social and environmental responsibilities determined within the framework of the principles contained in this document.

## 2. PURPOSE

The Supplier Code of Conduct includes the basic principles that we expect all suppliers that have or will have a business relationship with our bank and its subsidiaries.

Our suppliers are required to implement the necessary processes and policies in accordance with these principles, to make the necessary communication with their employees, and to ensure the continuity of the compliance process with regular information.

This document, which covers all suppliers/subcontractors working with Akbank, is expected to be understood and adopted by the relevant parties and to act in accordance with these values.

The most up-to-date version of the "Supplier Code of Conduct" is available at [www.akbank.com](http://www.akbank.com).

## 3. REFERENCE MATERIALS

Supplier working and behavior principles have been determined in accordance with legal regulations, our bank's policies and regulations, and international regulations and principles.

The highlights of these policies, regulations and commitments are presented below:

- Our bank's policy and implementation principles
  - Ethical Principles
  - Akbank Sustainability Strategy
  - Anti-Bribery and Anti-Corruption Policy
  - Compliance Policy
  - Diversity and Inclusion Policy
  - Environmental and Social Policies
  - Human Rights Policy
  
- International regulations, principles and policies
  - United Nations Global Compact
  - ISO 14001 Environmental Management System
  - ISO 4501 Occupational Health and Safety System
  - Global Reporting Initiative
  - SA 8000
  - Ethical Trading Initiative
  - CDP Climate Change Program
  - International human rights conventions to which Turkey is a party
  
- Legal regulations

In addition to complying with these principles and legal regulations, we expect our suppliers to show sensitivity in order not to act contrary to international agreements, initiatives, standards and guidelines.

## **4. BASIC PRINCIPLES**

### **4.1 Compliance with Laws and Contracts**

We expect our suppliers to comply with the legal regulations, the contracts and related documents governing the business relationship with our bank, and the regulations that we are subject to in the national and international arena.

### **4.2 Human Rights**

We expect our suppliers to respect human rights and to fully comply with Akbank's Human Rights Policy and similar regulations, primarily the legal regulations and the United Nations Guiding Principles on Business and Human Rights.

In this context, our suppliers need to comply with following matters;

- Employing their employees in accordance with national and international agreements, other labor legislation and regulations,
- Providing a business environment that supports diversity and inclusion, taking necessary measures to prevent discrimination based on gender, religion, language, nationality, age, disability,
- Compliance with regulations and legislation regarding working hours and working conditions,

- Not employing children and those under the legal responsibility age, adhering to all regulations in this regard, avoiding all forms of work that may fall within the scope of forced labor,
- Creating a safe and supportive work environment, ensuring occupational health and safety, taking all measures to prevent occupational accidents,
- Encouraging respect and compliance with occupational health and safety rules, and to continue the necessary training activities to increase the awareness of the employees.

#### **4.3 Sustainable Environment**

We expect our suppliers to,

- Act in line with Akbank's environmental and social policies and principles, cooperating when necessary and taking corrective measures,
- Act in accordance with the applicable legislation and regulations regarding the protection of the environment and the transport and use of dangerous and harmful substances,
- Evaluate the environmental impacts of its activities during its work and take the necessary measures to minimize the negative effects, if any, on the environment.
- Show sensitivity to issues such as the protection of biological diversity, sustainable natural resources, cultural heritage and sensitive protected areas.

We reserve the right to demand that they determine their environmental policies, objectives and targets, determine the evaluation systems that will measure the impact of their activities, in line with Akbank's environmental policies, and choose to terminate our business relationship if a situation contrary to these arises.

#### **4.4 Prevention of Conflict of Interest**

No commercial relationship is entered into with companies (working/partnership) with which first-degree relatives (spouse, siblings, parents, children) of employees authorized to make purchases at Akbank, even if they provide commercial benefits to the bank.

In the presence of such situations, a conflict of interest arises and is reported.

Likewise, our suppliers should notify the bank of their relations with persons/institutions that may create a conflict of interest.

#### **4.5 Prevention of Laundering of Crime Revenues and Funding of Terrorism**

Akbank takes the necessary measures for,

- Preventing funds from illegal sources from entering the financial system and using them in the financial system,
- Prevention of laundering of crime revenues and funding of terrorism,

- Not to enter into business relations with persons and organizations that are considered prohibited according to local and international legislation.,
- Operating in compliance with economic sanctions and embargoes

and implements them meticulously.

Our suppliers are expected to show the same sensitivity. In this context, our suppliers are required to take the necessary measures to comply with the relevant legislation, bank policies, principles and regulations, to implement policies and procedures, not to violate economic sanctions and embargoes, and not to expose Akbank to similar risks.

#### **4.6 Fighting Against Corruption**

Akbank's published policies and ethical rules are followed in all purchasing processes. Purchasing processes are transparent and explainable.

In order to prevent bribery and corruption, all legal regulations are complied with, and maximum sensitivity is shown in line with the principles of transparency, accountability and impartiality. All of our suppliers are also strictly expected not to take such actions.

Our suppliers are expected;

- Not to offer bribes, gifts, job offers, etc. to influence employees' decisions
- Not to make any proposals that provide benefits for the purpose of granting them privileges,
- In summary; to avoid any action that would prevent the process from being carried out in a fair, impartial, transparent and accountable manner during the purchase of products and services.

#### **4.7 Competition**

Our suppliers must comply with competition laws, avoid practices that prevent competition and all practices that may lead to unfair competition. Abusing a dominant position and tarnishing the reputation of rival companies is unacceptable behavior.

#### **4.8 Information Risk and Confidentiality**

All information regarding Akbank, our suppliers and third parties is confidential. Our suppliers must protect the confidentiality of commercial and personal information, take the necessary measures to ensure compliance with all privacy and data protection laws, and comply with the law. Access to and storage of confidential information is subject to agreements and laws between us and our supplier.

### **5. COMPLIANCE WITH AND MONITORING OF PRINCIPLES OF CONDUCT**

Our suppliers are required to comply with these principles in their transactions and activities.

- Our suppliers must undertake to comply with the determined rules by accepting this document.
- Our suppliers should also take utmost care to ensure that their suppliers are also aware of these principles and act in accordance with these purposes.

- Our suppliers are expected to respond to requests for information in order to monitor compliance with Akbank Supplier Code of Conduct.

We would like to share that we may decide to terminate the business relationship with our suppliers in case of non-compliance with these rules.

## **6. ETHICS LINE**

If our suppliers encounter situations, behaviors and transactions that do not comply with the legal regulations or these principles of behavior, they are expected to report it by sending an e-mail to [etik@akbank.com](mailto:etik@akbank.com) or by calling 212 385 77 77.

All notifications coming to the ethical line are carefully evaluated by the relevant teams and necessary actions are planned.