

DECLARATION OF WHISTLEBLOWING CHANNELS



CONTENTS

- 1. Purpose and Scope 1
- 2. Unacceptable Conduct 1
 - 2.1. Reporting Unacceptable Conduct 1
 - 2.2. Concluding Unacceptable Conduct 3
- 3. Protecting the Whistleblower 3

1. Purpose and Scope

Yapı Kredi primarily aims to establish a working environment that fosters full communication on every level by treating its employees respectfully, thoughtfully and sympathetically.

The purpose of this statement is to create an atmosphere of free speech for Yapı Kredi employees to report unacceptable conduct within the organization.

In the event of unacceptable conduct including those listed below, disciplinary actions may apply. Such actions may even result in termination of the employment contract depending on the severity of the incident.

Unacceptable conduct rules apply to all employees and executives across Yapı Kredi.

2. Unacceptable Conduct

Unacceptable conduct includes acts that may harm the mission or reputation of Yapı Kredi or its employees, resulting from the violation of matters stipulated by internal regulations, policies, circulars, directives and other regulations.

Matters indicated below include but are not limited to examples of such behavior:

- Acts in violation of the Code of Ethics and Business Conduct,
- Practices contrary to the Bribery and Anti-Corruption Policy,
- Misconduct and corruption reports,
- Breach of legal or regulative obligations while performing tasks,
- Practices contrary to the Conflicts of Interest Policy,
- Actions contrary to the policies and procedures related to sanctions regulation, situations contrary to corporate rules and regulations.

2.1. Reporting Unacceptable Conduct

All employees are personally responsible for reporting any situation involving above mentioned breaches in order to protect Yapı Kredi's prestige and reputation.

In cases where an employee cannot decide whether an act constitutes an unacceptable conduct, they may report the event confidentially and anonymously to their superiors or to the contact points specified herein.

Considering the protection of the whistleblower, all reports made to the communication channels will be kept confidential; similarly anonymous reports will also be treated confidentially. Situations reported or notified are evaluated according to their content and characteristics. After the evaluation, if the situation should be subject to an investigation, review etc., or in the case of an operational error, risk, etc., departments whose contact information is provided below will take charge of the issue, examine it as per the rule of confidentiality and ensure that a feedback is provided.

Malicious and/or defamatory reports or situations where unacceptable conduct is overlooked or not reported despite being noticed may be treated as a violation of rules and trigger disciplinary action that may result in termination of the employment contract.

The communication channels established to report those engaged in unacceptable conduct specified herein, those violating the rules stipulated by internal regulations, policies, circulars, directives and other regulations, or suspicious situations that may harm the institution's prestige are given below:

Internal Audit Whistleblowing Hotline

+90 212 339 60 10

acikhat@yapikredi.com.tr

Ethics Whistleblowing Hotline

+90 212 339 73 53

etik@yapikredi.com.tr

Bribery and Anti-Corruption Whistleblowing Hotline

+90 212 339 73 30

yolsuzluklamucadele@yapikredi.com.tr

Financial Sanctions Whistleblowing Hotline

+90 212 339 87 78

yaptirim@yapikredi.com.tr

Conflicts of Interest Whistleblowing Hotline

+90 212 339 60 39

cikarcatismasi@yapikredi.com.tr

2.2 Concluding Unacceptable Conduct

Any necessary step must be taken for a fair and objective investigation. These steps require that persons under investigation be allowed to explain themselves in written form and granted sufficient opportunities to defend themselves against the charges.

The report must be concluded swiftly, giving priority to the confidentiality of the investigator, the person reported as well as the persons affected by the situation in question.

3. Protecting the Whistleblower

No employee will be subject to degradation [seniority/title] or another adversity [disciplinary action, dismissal, etc.] for refusing to get involved in an unacceptable conduct, reporting such behavior or expressing their concerns thereof; nor will they be led to a disadvantaged position for the same reasons.

Yapı Kredi guarantees to protect the anonymity of reporting employees unless:

- Laws mandate a disclosure,
- A disclosure is necessary to prevent or mitigate a serious threat affecting the relevant person's health or safety.