

# **TÜRKİYE HALK BANKASI A.Ş.**

## **DISCLOSURE POLICY**

### **Objective of the Disclosure Policy**

The objective of the Bank's statements and disclosures, made in line with the principle of "transparency" which is one of the key elements of the Bank's corporate values, is to provide financial and non-financial information to the public, potential investors and all beneficiaries, including shareholders, promptly, completely and accurately in accordance with corporate governance principles, in addition to statements and disclosures determined by laws and regulations, which are non-confidential or not regarded as commercial secrets.

### **Legal Basis of the Disclosure Policy**

The procedures and principles of the Disclosure Policy of our Bank have been prepared in line with Article 23 of the "Communiqué on Principles of Material Disclosure to Public" Serial: VIII, No: 54, and with Article 8 of the Guideline, which is an appendix to the aforementioned Communiqué, with the "Communiqué on Determination and Implementation of Corporate Governance Principles" Serial: IV, No: 56, and also with the provisions of the Corporate Governance Principles of the Capital Market Board, which is an appendix to the aforementioned Communiqué .

### **The Procedures and Principles of the Disclosure Policy**

Our Bank will provide an adequate level of information about the Bank available to the public and in particular to investors, by four primary methods. These include:

- 1-) Disclosure of the Financial Data to Public,
  - a-) Financial Statements and Annual Report
  - b-) Investor Informing Meetings
  - c-) Announcement of the Ratings
- 2-) Material Disclosure,
- 3-) Statements to be Made Through Media Organs,
- 4-) Monitoring the News Released About the Bank Through Media Organs.

#### **1-) Disclosure of Financial Data to the Public**

##### **a-) Financial Statements and Annual Reports:**

Financial Statements and Annual Reports are disclosed to public, in accordance with the requirements of the "Regulation on the Procedures and Principles for Accounting Practices and Retention of Documents by Banks" and the "Regulation on the Principles and Procedures of Preparation and Announcement of Annual Activity Reports of Banks" published by the Banking Regulation and Audit Authority (BRAA) and the "Communiqué on Principles of Financial Reporting in Capital Markets" published by the Capital Markets Board (CMB) with Serial: XI, No: 29. Accordingly, unconsolidated financial statements and interim annual reports are disclosed to the public on a 3-month basis starting on January 1st and within 45

days following the end of the reporting period, whereas the consolidated financial reports are disclosed within 75 days following the end of the reporting period.

The public disclosure process for the Financial Statements and Annual Reports will be executed by the Bank's Directorate of the Financial Accounting and Reporting Department. These reports can be accessed at [www.halkbank.com.tr/Investor Relations/Financial Information](http://www.halkbank.com.tr/InvestorRelations/FinancialInformation). The same documents will also be available at the websites of the Public Disclosure Platform (Kamuyu Aydınlatma Platformu - KAP), Istanbul Stock Exchange (ISE), and the Banks Association of Turkey.

#### b-) Investor Information Meetings:

Following the disclosure of the Bank's unconsolidated financial reports on a 3-month basis as of January 1st and within 45 days following the reporting period, when and if necessary, the Directorate of Financial Institutions and Investor Relations Department organizes teleconferences in order to share with investors the developments in the financial and administrative structure of the Bank and to respond to the inquiries of investors about the Bank's quarterly results. The details of these teleconferences are published on the website of the Bank, at [www.halkbank.com.tr/Investor Relations/Calendar of Events/Financial Disclosure](http://www.halkbank.com.tr/InvestorRelations/CalendarofEvents/FinancialDisclosure), and shall also be submitted to all investors and analysts via electronic mail.

The requests of Corporate Investors to have one-on-one meetings about the financial and administrative structure of the Bank are evaluated by the Directorate of Financial Institutions and Investor Relations Department and meetings or teleconferences are organized for requests which are deemed appropriate.

Corporate Investors located abroad are kept informed of the Bank's activities so that they might monitor the developments of the Bank, through promotional events held during certain periods by the Directorate of Financial Institutions and Investor Relations Department or via participation in other events. Information about the place and date of these organizations and promotional events are published at [www.halkbank.com.tr/Investor Relations/Calendar of Events/Roadshows and Conferences](http://www.halkbank.com.tr/InvestorRelations/CalendarofEvents/RoadshowsandConferences).

#### c-) Announcement of the Ratings:

The reports prepared by independent rating institutions based on the financial data and financial activities of the Bank and their conclusive ratings are published at the official website of the Bank at [www.halkbank.com.tr/Investor Relations/Corporate Information/Rating](http://www.halkbank.com.tr/InvestorRelations/CorporateInformation/Rating).

#### 2-) Material Disclosure

The information to be disclosed to the public in line with the requirements of the "Communiqué on Principles of Material Disclosure to Public" Serial: VIII, No: 54, published by the Capital Markets Board of Turkey and with the requirements of the appendix Guide, is delivered by the Directorate of the Financial Accounting and Reporting Department to the ISE at the time of the realization of the process or upon having knowledge. Material disclosures are accessible at [www.halkbank.com.tr/Investor Relations/Press Room/Material Disclosures](http://www.halkbank.com.tr/InvestorRelations/PressRoom/MaterialDisclosures) and [www.imkb.gov.tr/Company News](http://www.imkb.gov.tr/CompanyNews) and at the Public Disclosure Platform.

As also stated in the said Communiqué, the disclosure statements are not confined just to those stated in the Communiqué and the Guide, but may also include investment decisions as well as any other financial and non-financial information that might affect the value of the Bank's capital markets instruments.

### 3-) Statements to be made through Media Organs

Our Bank issues a press release regarding the activities of our Bank, newsworthy development that needs to be shared with the Investors or the public. Press releases can be in written form but when necessary press conferences or interviews may be arranged. Press releases can be issued by the Head of the Board of Directors and Members of the Board, by the General Manager, by the Deputy of the General Managers, and by other authorities assigned by the above persons, with the coordination of the Directorate of the Public Relations (PR) Department. Press releases about important topics are also published on the Web site of our Bank: [www.halkbank.com.tr/ Investor Relations/Press Room/Press Releases](http://www.halkbank.com.tr/Investor%20Relations/Press%20Room/Press%20Releases).

### 4-) Monitoring the news released about the Bank through Media Organs

The news released about Halkbank in the domestic press and other media is monitored by the Directorate of the PR Department, in co-operation with a professional media-monitoring agency. Any wrong, unsubstantiated news or rumor, not released by an authorized representative of the Bank is evaluated with regard to its potential impact on the prestige of the Bank and its effects on capital markets instruments of the Bank and if necessary, a corrective statement can be made with a method found appropriate by the Bank. Such statements can be made by authorized representatives with the coordination of the Directorate of the PR Department. Statements of significance are published on the website of our Bank: [www.halkbank.com.tr/OurBank/News](http://www.halkbank.com.tr/OurBank/News) From Halkbank. When required by laws and regulations, material disclosure can be made.

### **Criteria in Identifying People with Administrative Responsibility**

As stated in Article 4, Clause "1/1" of the "Communiqué on Principles of Material Disclosure to Public" Serial: VIII, No: 54 published by the Capital Markets Board of Turkey, Members of the Bank's Board of Directors are the authorities assigned with administrative responsibility; the resumes of the Members of the Board of Directors are available at [www.halkbank.com.tr/About](http://www.halkbank.com.tr/About) Halkbank/Board of Directors.

At our Bank, we do not have any authorities that perform transactions or have administrative responsibility in line with Article 4, Clause "1/2" of the Communiqué.

### **Measures for the Protection of Information Fundamental to the Material Disclosure**

Our Bank demonstrates the required sensitivity to protect the information that is fundamental to material disclosures, until the statement is made. Members of the Board of Directors, Executive Managers, and the personnel that may have access to internal information, have been informed about the current laws and regulations related to the protection of the confidential information that might have an impact on investors' decisions and on the value of the capital markets instrument until the disclosure is made.

Issues that require the material disclosure are delivered independently and directly by the pertinent Department to the Directorate of Financial Accounting and Reporting Department and consequently from this Department to ISE and to the Public Disclosure Platform.

Notifications can also be delivered via “e-MANAGE: Corporate Governance and Investor Relations Portal” of the Central Registry Agency.