

TÜRKİYE HALK BANKASI A.Ş.
POLICY ON BENEFICIARIES

INDEX

1. PURPOSE AND SCOPE	2
2. BENEFICIARIES	2
3. PROTECTION OF BENEFICIARIES	2
4. PRESERVING THE COMPANY'S VALUE	2
5. DISCLOSURE TO BENEFICIARIES.....	2
6. PARTICIPATION OF BENEFICIARIES IN MANAGEMENT	3
7. HUMAN RESOURCES POLICY	3
8. PERSONNEL'S RELATIONSHIP WITH THE BANK AND ITS CUSTOMERS	4
9. PREVENTION AND RESOLUTION OF POTENTIAL CONFLICTS OF INTEREST AND RESPONSIBILITIES	4
10. ENFORCEMENT	5

1. PURPOSE AND SCOPE

The purpose of this policy document is to prevent conflicts of interest that may arise between Türkiye Halk Bankası A.Ş.'s legal entity, partners, personnel, executives, persons that have direct or indirect relationship with these and Türkiye Halk Bankası A.Ş.'s customers, suppliers and third persons, to identify the conflicts of interest which do arise, and to determine the organizational structure oriented towards providing the necessary governance in this regard.

2. BENEFICIARIES

Beneficiaries are described as any person, institution or interest group involved in the activities of the corporation and helps to achieve its aims. In this regard, our beneficiaries are our shareholders, employees, customers, correspondent banks, institutions from which credit is obtained, public institutions, suppliers and other bodies with which we have relations.

3. PROTECTION OF BENEFICIARIES

In the case of an infringement of beneficiaries' rights, which are protected by laws and regulations and by contracts, an opportunity for efficient and quick compensation is provided. The Bank provides the necessary convenience for the use of mechanisms such as compensation offered to beneficiaries by law and regulations. In cases where beneficiaries' rights are not regulated by laws and regulations, beneficiaries' interests are protected within the framework of principles of goodwill and to the extent of the Bank's facilities, with regards to the Bank's reputation.

4. PRESERVING THE COMPANY'S VALUE

Members of the board and executives shall not make dispositions that may result in a decrease of assets with the intent of damaging beneficiaries.

The Bank sets as an important principle, combatting with the laundering of money due to crimes, corruption and similar crimes and it actively cooperates with other institutions and corporations and authorities regarding such matter within the framework of international norms and the provisions of national laws and regulations.

The Bank takes every precaution to prevent the use of insider information.

All information and documents relating to customers are kept confidential and carefully stored except for persons and authorities who are explicitly authorized to request such information and documents by laws and regulations.

5. DISCLOSURE TO BENEFICIARIES

During the process of disclosure to the Bank's beneficiaries and other beneficiaries, our Bank adopts the policy of disclosing information within the framework of principles of equality, accuracy, impartiality, consistency and timing.

As part of this policy, we endeavor to make our announcements and statements in a timely, accurate, complete, comprehensible, analyzable and easily accessible manner, taking into account the Bank's rights and interests.

Beneficiaries are informed by means of minutes of General Assembly meetings, disclosure of material events, press releases, annual reports, the Bank's website, electronic mail and similar means/channels.

In addition, the Internal Communication Platform which has been deployed to strengthen the communication among the personnel as well as to increase motivation, and which provides ease-of-access to internal communication channels through a single platform, can be accessed via the corporate portal. "Halkbank'ta Beraber" e-journal, published quarterly on the web and mobile, aims to increase information sharing and communication among the personnel.

The general functioning of our disclosure activities is carried out within the framework of Türkiye Halk Bankası A.Ş.'s Disclosure Policy and the Bank's Disclosure Policy can be viewed on our website.

6. PARTICIPATION OF BENEFICIARIES IN MANAGEMENT

Shareholders:

The protection of shareholders' rights of participation in management is ensured within the framework of relevant laws and regulations, and articles of association.

Personnel:

Personnel Commitment and Satisfaction Surveys are regularly conducted each year to measure and evaluate the factors affecting the commitment and motivation of the personnel and to increase the effectiveness of the personnel in decision processes. At the same time, the opinions, suggestions and requests of the personnel are taken into consideration by regularly making Branch/Division visits in order to analyze the factors that affect the personnel's satisfactions and to encourage the participation of personnel to decision processes.

The effective participation of personnel in the decision-making process is ensured with the quality suggestion system. Through this system, personnel's suggestions for improving work processes are evaluated and those deemed feasible are implemented. The maker of the suggestion is awarded when necessary, taking his/her contribution to work processes into consideration.

Customers:

We ensure that all problems, suggestions, requests, opinions, proposals, and complaints from our customers are resolved and/or conveyed to the relevant units of the Bank via the Satisfied Customer Center. Opinions, suggestions and complaints about products and services are relayed through telephone, fax, mail, Internet, General Directorate units as well as social media and CİMER (Communications Center of Presidency) and Official Agencies and Bodies (BRSA, CBRT, TBB, Consumer Arbitration Committee) which are independent channels. The address and telephone number of the persons to whom such requests or complaints are to be made will be provided on the website.

7. HUMAN RESOURCES POLICY

The rights and obligations, working conditions, and other personal rights of Bank personnel are set out in the Human Resources Policy agreed upon in the Board of Directors resolution. The Bank's Human Resources Policy can be viewed on our website.

8. PERSONNEL'S RELATIONSHIP WITH THE BANK AND ITS CUSTOMERS

Our main strategy is an understanding of customer oriented, high-quality service and our aim is to ensure customer satisfaction by providing the highest quality and fastest level of service in the sector for all work processes. Within the framework of this new process, we determine the needs of our customers, develop different products for the sector and make systemic arrangements regarding our customers' requests. Bank employees are provided with sales and marketing training as well as training oriented towards vocational and personal development to increase the quality of service provided to our customers.

Halkbank customers can obtain information about all of our banking services and products, carry out banking transactions, and provide opinions, suggestions, requests and complaints through the Satisfied Customer Line and other channels on 24/7 basis.

Our customers can provide opinions, suggestions, requests and make complaints in written form to Satisfied Customer Center through Halkbank Branches; 0850 222 0 400 Halkbank Dialog; www.halkbank.com.tr website; Halkbank Mobile Branch; our Bank's social media accounts; fax number 0212 340 09 99 or PK 17 34735 Sahrayicedit/Istanbul mailing address.

9. PREVENTION AND RESOLUTION OF POTENTIAL CONFLICTS OF INTEREST AND RESPONSIBILITIES

The personnel shall comply with the legal statutes regarding the prevention of conflicts of interest, decisions taken by the competent authorities and Bank regulations.

The Bank takes all necessary measure to prevent the use of insider information pertaining to beneficiaries such as shareholders, customers and suppliers by employees in a manner which would give rise to conflicts of interest. The Bank ensures that all kinds of information and documents related to the beneficiaries are kept confidential and stored diligently. The Bank does not share these with persons and entities other than the authorities entitled by law. The Bank does not keep the information and documents containing sensitive information in open environments which would allow unauthorized individuals to access them, and takes measures to keep them confidential.

Implementations to create awareness in the personnel are developed in order to prevent conflicts of interest between the bank and the customer as well as between the customers themselves and to effectively manage these conflicts of interest.

The Bank plays a leading role in the elimination and resolution of disputes that may occur between the Bank and the beneficiaries. If a conflict of interest occurs between beneficiaries, or a beneficiary is involved in more than one interest group, a policy as balanced as possible is followed with respect to the protection of rights and with the aim of protecting each right independent from others.

The personnel are required to inform their customers about the benefits of the products and services that are offered to them as well as the risks that these might cause. If a conflict of interest occurs regarding the products or services offered, the personnel shall inform their executive one level senior about the situation. If the situation is under the executive's authority, the executive ensures the resolution of the conflict; in the event that the situation exceeds the executive's authority, the conflict is resolved by following an upper division/executive chain of command to which the executive reports.

The Bank's personnel shall comply with the relevant legal statutes, decisions taken by the competent authorities and the Bank regulations in their relations with the suppliers with whom the Bank establishes a business relationship. If a conflict of interest arises between the Bank and the supplier, the personnel shall inform their executive one level senior about the situation. If the situation is

under the executive's authority, the executive ensures the resolution of the conflict; in the event that the situation exceeds the executive's authority, the conflict is resolved by following an upper division/ executive chain of command to which the executive reports.

Statutory compliance shall be audited by the Bank's internal control and internal audit divisions in order to decrease the conflict of interest risk which might be caused by the personnel.

The Bank's Ethical Principles are set out in the Human Resources Policy to prevent disagreements and conflicts of interest that may arise between employees, customers and the Bank. Our activities and customer relations are executed in line with these ethical principles. The Bank's ethical principles can be viewed on our website (www.halkbank.com.tr).

The Board of Directors, Corporate Management Committee, Top Management and all divisions and personnel that are related with customers shall be individually responsible for the implementation of this Policy. In addition, Bank personnel are required to comply with the provisions found in this Policy document.

The policy document shall be reviewed when necessary, its up-to-date version shall be announced to the personnel and it is made available to the beneficiaries by being published on our website (www.halkbank.com.tr).

10. ENFORCEMENT

This policy document was created with the Decision of the Corporate Management Committee dated 27.03.2025 within the framework of the authority delegated to the Corporate Management Committee with the Board of Directors Decision dated 05.08.2009 and numbered 26-05 regarding the creation of the Policy on Beneficiaries within the context of Corporate Management Principles.

With the entry of this policy document into effect, the Policy on Beneficiaries passed with the Decision of the Board of Directors dated 06.03.2013 and numbered 10-03 has been abrogated.