

Statement of anti-bribery principles

ZiraatBank BH d.d. Sarajevo (hereinafter "Ziraat") values guide the way we behave as individuals and the way we do business. At the heart of our values are the Ziraat Values. The values state that we act with integrity, behaving honestly, prudently and responsibly, so that we can continue to earn the trust of all of our respected clients.

Ziraat has a zero tolerance towards bribery and corruption, regardless of the identity or position of the originator or recipient of the bribe. Ziraat's Management Board expects all our employees to always do business in accordance with the highest standards of ethical behavior and honesty. This also means we are committed to the prevention, deterrence and detection of bribery and corruption. Bribery and corruption are criminal offences and are clear violation of the Ziraat Values. Engaging in behavior or activities contrary to Ziraat's Values, as well as all other applicable laws and regulations, violates our promise to our clients. We do not and will not pay bribes or offer improper inducements to anyone for any purpose, nor do we or will we accept bribes or improper inducements or anything that could be perceived as such and we have similar expectations of our third parties and clients.

The Ziraat zero tolerance principles towards bribery and corruption also apply to third parties with whom Ziraat does business with or who are retained by Ziraat to perform services or deliver business for and on behalf of Ziraat. The Ziraat anti-bribery and anti-corruption principles are summarized below:

Bribery and facilitation payments

All forms of bribery and all actions that in our opinion give the appearance of offering or accepting a bribe, including facilitation payments are prohibited.

Gifts and Entertainment

No Ziraat employee may offer or receive a Gift or an Entertainment, regardless of its value, which in our opinion might create or give the appearance of creating a conflict of interest, constitute an inducement or bribe, or violate applicable laws, regulations and/or the Ziraat Values. Any form of gifts, entertainment or other advantage offered and received must be subject to an assessment on its acceptability and appropriateness regardless of the amount or value.

Public Officials

Ziraat do not prohibit legitimate business interactions with Public Officials or State-owned enterprises, but these are subject to heightened attention and stricter conditions, such as pre-approvals (Management Board and Compliance Department approvals) and lower limits.

Travel and Accommodation

Ziraat employees should generally not accept or offer travel and accommodation related to corporate hospitality packages.

Political contributions/donations

Ziraat employees are not permitted to make gifts or political donations or to offer entertainment to political parties or candidates for political office.

Charitable contributions

Ziraat employees should ensure that charitable contributions are made to bona fide charities and are not used to conceal a bribe.

Recording and registration

Ziraat employees should ensure that expenses and payments related to third parties are registered and accurately recorded in the financial books.

Violations

Ziraat employees are encouraged to report violations via the internal reporting lines.

Third parties can report alleged irregularities of a general, operational and financial nature - including issues relating to accounting, administration and internal control - within Ziraat via: compliance@ziraatbank.ba or via:

ZiraatBank BH d.d. Sarajevo

Head of Compliance Department

Zmaja od Bosne 47c / 71000 Sarajevo / Bosnia and Herzegovina

* * *

Sarajevo, 24/01/2020