Garanti Bank S.A. Code of Conduct for Suppliers

November 2026

Table of Contents

Table of Contents **2**
1. Introduction **3**
2. Purpose **3**
3. Scope **3**
4. Basic Principles **3**
4.1. Legal Compliance 3
4.2. Commitment to Human Rights 4
4.3. Commitment to Sustainability 4
4.4. Supply Chain (subcontracting) 5
4.5. Combating Corruption 5
4.6. Prevention of Money Laundering and Financing of Terrorist Activities 6
4.7. Political Contributions 6
4.8. Conflicts of Interest 6
4.9. Free Competiton 7
4.10. Confidentiality 7
5. Compliance and Monitoring of the Code **7**
6. Ethic & Compliance Line **7**

1. Introduction

As Garanti Bank S.A.., we value our relationships with companies that we have commercial activities. We understand that integrating ethical, social and environmental factors in our supply chain is part of our responsibility. For this reason, this Code sets out the minimum standards of ethical, social and environmental conduct that we expect our suppliers to comply with when providing products and services to us. We recognise that many of our suppliers have already adopted such standards and we hope that those who have yet to do so will design and implement appropriate internal procedures to ensure that they comply with such standards.

Garanti Bank S.A. promotes the application of such standards in accordance with the International Bill of Human Rights, the United Nations Global Compact and the principles of action and recommendations for the conduct of business activity issued by the United Nations, the Organization for Economic Cooperation and Development and the International Labour Organization.

Our Code should be read in conjunction with the provisions governing the legal relationship between the supplier and Garanti Bank S.A. (general terms & conditions, agreements, etc.).

As Garanti Bank S.A., we will periodically review this Code and will make any necessary changes.

2. Purpose

This code sets out the basic principles that is expected to be respected by our suppliers with whom any company or entity of the Garanti Bank S.A. has relations.

We expect our suppliers to adopt the necessary policies and procedures to ensure compliance with this Code and to take any necessary communication and training actions to ensure that their employees and their supply chain read, understand and act in accordance with the provisions of this Code.

3. Scope

Code applies to all of our suppliers who in the course of their business activities have relations with a company or entity of the Garanti Bank S.A. Group when providing goods or services, irrespective of their nationality and the place of supply of the services.

Any reference to Garanti Bank S.A. made in this Code will be deemed to be made to any company of the Garanti Bank S.A. Group or to any entity related thereto (for example, a foundation).

4. Basic Principles

4.1. Legal Compliance

We expect our suppliers to comply with all regulations, legislations being in force , provisions governing the relationship between the Garanti Bank S.A. and suppliers (general terms & conditions, agreements, etc.) and any international regulations to which Garanti Bank S.A. is subject in the conduct of its activities

4.2. Commitment to Human Rights

As Garanti Bank S.A. we strive to advance human rights in our relations with our suppliers. For this reason, We aim to work with those suppliers who have human rights policies and procedures in place that are consistent with ours.

As Garanti Bank S.A. we also support human rights in our supply chain by promoting actions and practices that are consistent with the United Nations Guiding Principles on Business and Human Rights and the objectives set out in our Commitment to Human Rights.

In particular, our suppliers shall:

- Ensure that they hire their employees in compliance with the applicable employment and migration law, international conventions and other regulatory and legal provisions of an employment nature.
- Guarantee that their employees are treated with respect and dignity, ensuring a work environment which promotes diversity and inclusion and which does not tolerate discriminatory attitudes.
- Encourage respect and compliance with the rules on occupational health and safety in accordance with the applicable legislation, providing employees with a safe and health risk free environment and promoting the prevention of accidents among all of their employees.
- Provide their employees with a fair salary that is at least equal to the minimum wage or to the salary established by collective bargaining agreement if this is higher.
- Respect the freedom of association of their employees, especially with regard to collective bargaining
- Respect the work schedule of their employees so that this does not exceed the maximum number of hours permitted by the applicable legislation.
- Ensure that they comply with the Minimum Age Convention No. 138 and Convention No. 182 on the Worst Forms of Child Labour of the International Labour Organization and that in accordance with such conventions they do not hire children.

As Garanti Bank S.A. we will be in cooperation with our supplier when it is found that the latter has committed serious violations of human rights. We shall refrain from operating with those suppliers who do not show progress in this regard.

4.3. Commitment to Sustainability

The protection of environment, sustainability and the drive towards “eco-efficiency” are a priority for Garanti Bank S.A., who has implemented a sustainability policy and supports the main international commitments in this regard in addition to its own policies. Chief among them are:

Garanti Bank S.A. Policies:

- Sustainability Policy
- Environmental Policy
- Code of Conduct
- Exclusion List in Environmental and Social Loan Policies
- Human Rights Declaration
-

International and National Initiatives and Standards

- United Nations Global Compact
- UNEP-FI

- IFC Performance Standards
- CDP Climate Change Program
- CDP Water Program
- ISO14001 Environmental Management System
- Leadership in Energy and Environmental Design (LEED) criteria
- United Nations Women's Empowerment Principles
- HeforShe
- WWF Green Office
- Caring for Climate (C4C)
- UNGC Business Leadership Criteria on Carbon Pricing
- Principles for Responsible Investment
- Relevant international human rights covenants to which Turkey is a signatory; chief among them,
- the principles set forth in the United Nations Universal Declaration of Human Rights, and,
- the basic tenets of the International Labor Organization, a specialized United Nations agency working to promote human rights, social justice, and labor rights.

Our suppliers undertake not to engage in actions that breach not only the provisions of the applicable legislation but also the provisions of the aforementioned international agreements, initiatives and standards on environmental and social issues.

Garanti Bank S.A. Bank also seeks compliance with Turkish legislation notably convention no 4857, particularly the Turkish Labor Code where necessary, and reserves the right to cancel contracts in the event of a non-compliance with regulations providing for worker protection.

4.4. Supply Chain (subcontracting)

Unless permitted by the provisions governing the legal relationship between the supplier and Garanti Bank S.A. (general terms & conditions, agreements, etc.), the use of subcontractors by the supplier is not permitted. In those cases where this is permitted, our suppliers shall ensure that when their supply chain supplies products or services to us, such supply chain knows, understands and complies with the standards set out in the Code. For such purpose, suppliers shall take any measures that they deem necessary for monitoring their supply chain and mitigating any possible negative impact on Garanti Bank S.A.'s reputation and integrity.

The provisions governing the legal relationship between the supplier and Garanti Bank S.A. (general terms & conditions, agreements, etc.) may establish additional controls when relationships are entered into with suppliers that may pose risk.

- The right to carry out audits in relation to compliance with the undertakings set out in this Code.
- The right to visit the supplier's premises in the country in question.

4.5. Combating Corruption

As Garanti Bank S.A., we do not tolerate any form of corruption or bribery in any of our activities and we have appropriate internal policies, procedures and controls to fulfil the obligations established by the different legal systems in relation to the prevention of corruption

In relation to the supply of goods and services to Garanti Bank S.A., our suppliers undertake to implement adequate policies and procedures in order to comply with the applicable legislation in this regard and to:

a. Not offer, promote or make, either directly or indirectly, any kind of payment, gift, bonus, donation, offers of employment, sponsorship, preferential treatment or benefit of any kind, intended for influencing or attempting to influence, in order to obtain an unfair benefit or advantage, the decisions of third parties, public employees or authorities or Garanti Bank S.A.'s employees.
b. Not accept gifts, payments, comissions or any other personal benefits from other third parties or Garanti Bank S.A.'s. employees.
c. Keep a suitable system of accounting records of all transactions, expenses and income, without omitting, concealing or altering any data or information, so that the accounting and operational records provide a true and fair view of their business.
d. Not make facilitation payments.

4.6. Prevention of Money Laundering and Financing of Terrorist Activities

Garanti Bank S.A. has the duty and the legal obligation to prevent funds of illegal origin from entering and using the financial system. To fulfil such duty, in the conduct of its ordinary financial activity, Garanti Bank S.A. has implemented a model for the prevention of money laundering and financing of terrorist activities in accordance with the applicable legislation and best international practice in this regard.

Our suppliers should be equally committed to ensuring that their actions do not constitute money laundering and terrorist financing. For such purpose, they shall ensure that they adopt the necessary measures to prevent such risk.

Additionally, Garanti Bank S.A. has procedures and systems in place to comply with the economic sanctions and embargos imposed by the international community and by some legislations to restrict business with certain countries, entities and persons. Our suppliers should share this commitment, adopting the measures that they deem appropriate so that their operations do not violate the aforementioned sanctions and embargos, exposing Garanti Bank S.A. to this kind of risks. The suppliers to whom the aforementioned legislation applies shall implement policies and procedures to comply with the aforementioned economic sanctions and embargos and to prevent illegal funds from entering and using the financial system.

4.7. Political Contributions

At Garanti Bank S.A. we conduct our business activity respecting the political pluralism. Garanti Bank S.A. does not make contributions to electoral campaigns or donations to political parties.

Int his regard, our suppliers shall not make political contributions on Garanti Bank S.A.'s behalf.

4.8. Conflicts of Interest

A conflict of interest exists when a personal or family situation, friendship or any other external circumstance may affect the professional objectiveness of Garanti Bank S.A.'s employees in their supply-related decisions.

Garanti Bank S.A. has internal regulations in place that make it necessary for its employees to report such situations to their superior, prior to any action and to refrain from participating in any decisions regarding matters affected by the conflict of interest or from influencing the persons responsible for taking such decisions.

Likewise, in order to ensure their full independence, our suppliers must report Garanti Bank S.A. about any situation of conflict of interest, actual or potential, that arises in any supply process that they intend to carry out with Garanti

Bank S.A., due to their personal or professional relations with Garanti Bank S.A.'s customers, suppliers, competitors or employees.

Suppliers must notify Garanti Bank S.A. , at the beginning of each contracting processes of services or purchasing any goods, if any shareholder, member of its management body or any of its employees related to such contract or purchase has been an employee of any company or entity of the Garanti Bank S.A. within the last three years. Our suppliers shall further notify us if the relevant individual involved in the hiring of purchase process proposed by Garanti Bank S.A. is providing his/her services to the supplier under a commercial relationship.

4.9. Free Competiton

The business activity of our suppliers must be conducted respecting the principle of free competition and avoiding any practices which illegally restrict such competition or which may be regarded as unfair competition, including, among others, the following:

- Negotiating or entering into agreements with competitors regarding prices, product offers, production levels, customer distribution, markets or market shares, boycotts of certain customers or suppliers or any other anti-competitive practice.
- Actions that may imply an abuse of dominant position.
- Damaging the reputation of competitors.

4.10. Confidentiality

Any information of Garanti Bank S.A., its customers, employees or any third party is confidential. Regarding access to and the storage of such information the provisions of the legislation applicable from time to time and the provisions governing the relationship between our supplier and Garanti Bank S.A. (general terms & conditions, agreements, etc.) shall apply.

5. Compliance and Monitoring of the Code

The Code is applicable on a mandatory basis to our suppliers in relation to their activities for the supply of goods and services to Garanti Bank S.A.. Garanti Bank S.A. expects its suppliers to monitor internally their compliance with this Code and to report to Garanti Bank S.A. any breach thereof, as well as to comply with any request for information regarding compliance with the Code.

6. Ethic & Compliance Help Line

In case of applications or situations resulting violation of the Code or legislation provisions , our suppliers are expected to report by sending e-mail to **sourcinggaranti@garantibbva.ro**. All of the information received will be examined in the frame of objectivity and confidentiality. Suppliers reporting such applications or situations with good intention, will not face sanctions or adverse outcomes.

All records will be examined in time with required attention and solution-oriented actions will be taken.