	ANTI-BRIBERY AND CORRUPTION POLICY	Document Code	PLT-GNL-003-v1
		Confidentiality Level	3
		Approved By	Board of Directors
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		Last Revision	-

1. Purpose

The purpose of this policy is to ensure compliance with anti-bribery and anti-corruption regulations applicable in all countries where the Bank operates, as well as adherence to ethical principles and other relevant international standards. As a Bank, we have zero tolerance for bribery and corruption.

2. Scope

This policy applies to all employees of the Bank, including the Board of Directors, as well as firms providing external services, business partners, and their employees.

3. Definitions

In this policy:

Bribery: An agreement between an individual and a third party to act against their duties, such as performing, not performing, accelerating, or slowing down an action, in exchange for direct or indirect benefits.

Corruption: The misuse of authority by a person in their position to gain unlawful benefit directly or indirectly, failing to perform their duties in accordance with the law, or abusing their position.
Regulations: All legal arrangements the Bank interacts with during its banking activities.

4. Authority and Responsibilities

Bribery and corruption can occur in various forms and areas, including:

- Gifts
- Political Donations
- Hospitality
- External Service Providers and Business Partners
- Facilitation Payments
- Abuse of Title and Position

The Board of Directors is responsible for creating, implementing, and updating the Anti-Bribery and Corruption Policy. Bank employees are responsible for adhering to the policies set by senior management, performing their duties in accordance with applicable laws, the Bank's policies, and implementation instructions.
Managers of all Bank departments are responsible for assessing potential risks and ensuring compliance with this Policy within their respective areas, including external service providers and business partners.

Bank employees must report any suspicious or questionable situations, including those involving bribery or corruption, to the Internal Audit Department. The reported cases will be examined confidentially by the Internal Audit Department. Feedback will be provided to the reporting employee if deemed necessary.
If it is determined that a Bank employee has acted against the principles outlined in this policy, disciplinary action will be taken. The authority to implement disciplinary procedures rests with the Disciplinary Committee appointed by the Board of Directors.

5. Primary Risk Areas for Bribery and Corruption

The Bank always aims to comply with applicable laws, regulations, and principles, showing zero tolerance for any act of bribery or corruption. The main risk areas for bribery and corruption are detailed below:

5.1. Gifts

A gift is a product or service offered without financial compensation, typically as a gesture of appreciation or courtesy in business relationships.
All gifts offered by the Bank to third parties are provided transparently and in good faith. Similarly, only symbolic gifts with low monetary value given to the Bank rather than individuals are accepted to avoid conflicts of interest. Any gifts outside this scope are strictly prohibited.

5.2. Political Donations

The Bank prohibits any corporate or personal payments, gifts, assistance, or donations to government officials or political party candidates to influence decisions regarding Bank operations. Donations and assistance, excluding political contributions, are conducted within the framework of relevant legislation.

5.3. Hospitality

The Bank may offer hospitality to third parties, such as clients, consultants, lawyers, auditors, or other entities with commercial ties to the Bank, to establish or strengthen relationships. Such hospitality is transparent, unconditional, and offered in good faith. Hospitality offers must not create conflicts of interest or give such an impression.

5.4. External Service Providers and Business Partners

External service providers and business partners must adhere to this Policy and relevant regulations. Contracts with external providers and partners include obligations to comply with the Bank's policies and ensure their employees understand and implement these principles.
The Bank does not work with individuals or entities known to have adverse intelligence regarding bribery and corruption or those on watch lists in this field. The selection of external service providers and business partners considers their adherence to ethical principles equivalent to the Bank's.

5.5. Facilitation Payments

The Bank prohibits facilitation payments to expedite or secure routine transactions or processes. No parties subject to this Policy are permitted to make or receive such payments, regardless of the nature or size of the transaction.

6. Accurate Record-Keeping

The Bank complies with legal regulations regarding accurate record-keeping and ensures that all transactions with third parties are documented comprehensively and reliably. The alteration or falsification of financial or commercial records is strictly prohibited.

7. Reporting Violations and Non-Compliance

All Bank employees and parties acting on behalf of the Bank must report any violations of this Policy or other concerns directly to the Internal Audit Department. Reports are handled with strict confidentiality, prioritizing the protection of the reporting individual from harm.
The Bank prohibits any form of retaliation against employees who refuse to participate in bribery or corruption, report violations, or express concerns about potential future misconduct.

8. Sanctions

All Bank employees must comply with the rules outlined in this policy and relevant anti-corruption laws. Non-compliance may result in disciplinary actions, including termination of employment. Legal consequences may also arise for violations of applicable anti-corruption laws.

9. Training

This policy is communicated to all employees through the Bank's communication channels and is readily accessible. Regular training is provided to ensure employees understand and adhere to the principles outlined in this policy.

10. Responsibility

The Legal and Risk Monitoring Department is responsible for preparing, maintaining, and implementing this policy. The policy is reviewed at least annually and updated if necessary.

11. Enforcement

This policy becomes effective upon approval by the Board of Directors and requires Board approval for updates.

12. Document History

Date	Version	Decision No	Description
09.01.2023	PLT-GNL-003-v1	YK-2023-01	Initial publication