

Garanti BBVA Code of Conduct for Suppliers

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1. Introduction

At the Garanti BBVA Group¹ we want to contribute positively to the development of the societies in which we operate. We understand that integrating environmental, social and governance factors into our supply chain is part of our responsibility. Therefore, this Code sets out the minimum standards of ethical, social, environmental and anti-corruption conduct that we expect our suppliers to observe when providing us with products and/or services. We recognize that many of our suppliers have already adopted equivalent standards and expect those that have not yet done so to develop and implement appropriate internal processes to ensure compliance.

Garanti BBVA Group fosters the effective application of these standards in accordance with the International Bill of Human Rights, the United Nations Global Compact and the principles of action and recommendations on the performance of business activities published by the United Nations, the Organization for Economic Cooperation and Development and the International Labour Organization.

This Code should be read in conjunction with the clauses governing the legal relationship between the supplier and the Garanti BBVA Group company concerned (general terms and conditions, contracts, etc.).

Garanti BBVA Group will periodically review this Code and make any changes deemed necessary. Suppliers must be aware of the Code at all times, which can be found at <https://www.garantibbvainvestorrelations.com/tr>.

In the event that significant changes are made to the Code and the supplier does not agree with them or is unable to comply, it must inform the Garanti BBVA Group company with which it operates of such circumstance.

2. Purpose

This Code sets out the basic principles that must be respected by all suppliers with whom any Garanti BBVA Group company 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.

¹ For the purposes of this document, Garanti BBVA Group shall be understood as the group of companies or entities comprising.

3. Scope

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

Any reference to Garanti BBVA made in this Code will be deemed to be made to any company of the Garanti BBVA Group.

4. Basic principles

4.1. Legal compliance

The suppliers of Garanti BBVA undertake to strictly comply with any legislation applicable from time to time, across all geographies in which they operate. Likewise, they shall comply with any offshore regulations to which Garanti BBVA is subject in the conduct of its activities, which will be identified in the provisions governing the relationship between the Garanti BBVA Group and its suppliers (general terms and conditions, agreements, etc.).

If any of the standards set out in this Code conflicts with the applicable legal provisions, we expect the suppliers concerned to inform us of such circumstances and to work with Garanti BBVA to agree on a solution that complies both with the applicable legal provisions and, as far as possible, with this Code.

4.2. Commitment to sustainability

Garanti BBVA ensures that the principles enshrined in its General Sustainability Policy also guide its relations with suppliers.

In a bid to **combat climate change and protect natural capital**, Garanti BBVA looks to spearhead the joint efforts going on across the globe to transition toward a zero net emissions economy by 2050, and to protect the world's natural capital. Consequently, Garanti BBVA aspires to work with suppliers through policies and procedures that will help achieve this vision. As a result, its suppliers have the following obligations, among others:

- Guarantee that they comply with current environmental legislation, international conventions and other legal and regulatory provisions of an environmental nature, regardless of the jurisdiction of origin or destination.

- Work to reduce their direct impacts (carbon footprint, water footprint, recycling and waste management, etc.) and indirect impacts deriving from their value chain.
- Foster the transition toward a zero net emissions economy.

In the field of **human rights**, Garanti BBVA aims to work with those suppliers who have human rights policies and procedures in place that are consistent with the UN Guiding Principles on Business and Human Rights and current legislation.

In particular, 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, irrespective of their home or host jurisdiction.
- Prohibit forced labor², mistreatment of their employees and any human trafficking.
- Ensure that they comply with the Minimum Age Convention (No. 138) and the Worst Forms of Child Labour Convention (No. 182) of the International Labour Organization and that they do not hire children in accordance with those conventions.
- Guarantee that their employees are treated with respect and dignity. In doing so, they shall ensure a work environment that is conducive to diversity and inclusion that does not tolerate discriminatory attitudes based gender, race, age, nationality, disability, religion, sexual orientation, ethnic origin, language, political ideology, political or union affiliation, or any other unjustified condition or circumstance.
- Encourage respect for and compliance with the rules on occupational health and safety in accordance with 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 work schedule of their employees so that this does not exceed the maximum number of hours permitted by applicable legislation.
- Respect the freedom of association of their employees, especially with regard to collective bargaining, ensuring that their exercise of such right does not result in adverse consequences or reprisals.

² Forced labor is as defined in Article 29 of the ILO Forced Labour Convention and Article 105 of the ILO Abolition of Forced Labour Convention.

4.3. Supply chain (subcontracting)

Unless permitted by the provisions governing the legal relationship between the supplier and Garanti BBVA (general terms and conditions, agreements, etc.), the use of subcontractors by the supplier is not permitted. In those cases where this is permitted, suppliers shall ensure that their subcontractors know, understand and ultimately comply with the standards set out in this Code. For such purpose, suppliers shall take any action they deem necessary to monitor their subcontractors and mitigate any possible negative impact on BBVA's reputation and integrity.

Furthermore, when prevailing circumstances so advise, additional controls beyond those indicated in the previous paragraph may be included in the clauses governing the legal relationship (general terms and conditions, contracts, etc.) between the supplier and BBVA.

4.4. Combating corruption

Garanti BBVA does not tolerate any form of corruption or bribery in any of the activities conducted by it and it likewise expects zero tolerance among its suppliers.

Garanti BBVA has an Anti-Corruption Program in place to ensure compliance with applicable legal and regulatory obligations on the matter. Thus, Garanti BBVA does not permit its employees to offer, promote or make, either directly or indirectly, any kind of payment, gift, bonus, donation, offer of employment, sponsorship, preferential treatment or benefit of any kind, where the purpose is to influence, or attempt to influence, in order to obtain an unfair benefit or advantage, the decisions of third parties, individuals or public employees in respect of Garanti BBVA's activity, or in respect of the persons who work at Garanti BBVA.

In relation to the supply of goods and services to Garanti BBVA, suppliers undertake to have adequate policies, procedures and controls in place to comply with applicable legislation in this regard and:

- Not to offer, promote or make, either directly or indirectly, any kind of payment, gift, gratuity, sponsorship, preferential treatment or benefit of any kind in a bid to influence, or attempt to influence – in order to obtain an unfair benefit or advantage – the decisions of third parties, public employees³ or employees of Garanti BBVA.
- Not to give, on behalf of Garanti BBVA, gifts or any other personal benefit to any individual or legal entity.
- Not to accept gifts, payments, commissions or any other personal benefits from other third parties or from Garanti BBVA's employees.

³ Any authority or person holding a legislative, executive, administrative, or judicial office in any country, whether appointed or elected, whether permanent or temporary, whether paid or unpaid; and any person who performs a public function in any country, including for a public national or international agency or corporation, such as the United Nations.

- To 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.
- Not to make facilitation payments.⁴

Suppliers may only offer or give personal gifts or benefits to Garanti BBVA employees as a token of hospitality or courtesy, or as a matter of customary business courtesy, and provided they are genuinely occasional, of reasonable value, proportionate to the circumstances and social customs, and compliant with Garanti BBVA Group's Code of Conduct. Under no circumstances may the following be offered or delivered:

- Cash or cash equivalents (gift cards, checks, etc.), regardless of the amount.
- Gifts or personal benefits that may be considered inappropriate or that may tarnish Garanti BBVA's good name or reputation, due to their nature or content.
- Gifts or personal benefits that, because of when they are offered or for any other reason, may be perceived to have been offered in a bid to influence professional decisions to be taken by the recipient.

4.5. Prevention of money laundering and financing of terrorist activities

The prevention of money laundering and the financing of terrorism is an integral part of Garanti BBVA's corporate culture, as it carries out its activities in numerous social environments to whose welfare it is firmly committed. To fulfill this commitment, Garanti BBVA has implemented an anti-money laundering and counter terrorist financing model that aims to prevent the use of the products and services it offers for illicit purposes, in accordance with current law and regulations and best international practice in this regard.

Suppliers should be equally committed and should therefore act as needed in accordance with applicable law to prevent the risk of money laundering and the financing of terrorism.

In addition, Garanti BBVA complies with international financial sanctions and countermeasures programs with the aim of combating, among others concerns, terrorism and its financing, the proliferation and financing of weapons of mass destruction, drug trafficking and violations of human rights and civil liberties. Suppliers must likewise comply with international financial sanctions and countermeasures programs applicable to them.

⁴ Facilitation payments are payments of small amounts of money to public officials in exchange for securing or expediting the course of an administrative procedure or routine action, such as obtaining a permit or license over which the entity has a legally conferred right. What differentiates a facilitation payment from other forms of corruption is that the person making such a payment is not seeking to obtain a business, contract or commercial transaction, but only to expedite a procedure and usually the payment is made to achieve something to which one is already entitled.

4.6. Fraud risk management

BBVA is committed to promoting a global strategy to combat fraud and protect the interests of its customers and BBVA itself.

Likewise, our suppliers are subject to the internal control mechanisms established by Garanti BBVA, thus ensuring that the processes they run for Garanti BBVA are safe and secure from a fraud standpoint.

4.7. Political contributions

At Garanti BBVA we conduct our business activity respecting the political pluralism of the societies in which we are present. Garanti BBVA does not make contributions to electoral campaigns or donations to political parties.

Garanti BBVA's suppliers shall comply with applicable legislation in this regard and shall not make political contributions on Garanti BBVA'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 BBVA's employees in their supply-related decisions.

Garanti BBVA 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, Garanti BBVA's suppliers must have reliable internal procedures in place for checking and verifying possible situations of conflicts of interest and informing Garanti BBVA immediately of any such conflict, whether actual or potential, that may arise in any supply process that they intend to carry out with Garanti BBVA, due to their personal or professional relations with Garanti BBVA's customers, suppliers, competitors or employees. Any person affected by the conflict must refrain from taking part in the procurement process in question.

Suppliers must notify Garanti BBVA, at the beginning of each procurement process, if any (i) shareholder, (ii) member of their management body or (iii) any of their employees related to such

procurement or process has been an employee of any company or entity of the Garanti BBVA Group within the last three years. Suppliers shall further notify Garanti BBVA if the relevant individual involved in the hiring or purchase process proposed by Garanti BBVA is providing his/her services to the supplier under a commercial relationship.

4.9. Free competition

Garanti BBVA strongly believes that the observance and enforcement of competition law is necessary for the proper functioning of the market economy.

Therefore, the professional activity of Garanti BBVA's suppliers must also be carried out in compliance with such regulations, avoiding any practices that illegally restrict competition, such as anti-competitive agreements or pacts with other companies, or practices that may involve an abuse of a dominant position.

4.10. Confidentiality and data protection

Any information of Garanti BBVA, its customers, employees or any third party is confidential⁵. Access to and storage of such information will be governed by prevailing legislation and the clauses governing the relationship between the supplier and Garanti BBVA (general terms and conditions, agreements, etc.). Where a procurement process involves the processing of personal data, suppliers must treat such data in accordance with the guidelines included in the specific data protection clauses and comply with any additional security and organizational measures required, while also ensuring that such data are processed in a duly confidential manner and in accordance with the duty of secrecy.

5. Garanti BBVA Group Whistleblower Channel

As a supplier of BBVA, if you observe any conduct or situation related to Garanti BBVA that may be unlawful or breach the standards set out in this Code, you must report it to etikbildirim@garantibbva.com.tr or **+90 216 662 5156**. We likewise expect our suppliers to let their employees know that they may report any suspicious actions or situations related to Garanti BBVA through this Channel. Disclosures may be made anonymously if so desired.

⁵Any information that is in the public domain on the date of this Code of Ethics (or that which enters the public domain after this date) or was obtained from a source not related to a company or entity of the Garanti BBVA Group will not be considered confidential, without restrictions regarding its use and without breach of any obligation of confidentiality

This Channel is available 24 hours a day, 365 days a year, from any computer or cell phone. The Channel allows users to talk safely and securely with the handler and they may remain anonymous at all times if they so wish.

The Compliance Unit shall promptly and diligently process all disclosures received by carrying out the relevant fact-checking exercises and taking further action to resolve the matter, in accordance with the management procedures of the Whistleblower Channel. The information will be analyzed in an objective, impartial and confidential manner.

Whistleblowers play a key role in preventing and detecting any type of inappropriate behavior, so affording them protection is a priority for Garanti BBVA. Those who report any incident or matter to the Whistleblower Channel in good faith will not be subject to retaliation or suffer any other adverse consequence for taking such action.

6. Compliance with and monitoring of the Code

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

Breaches of the provisions of this Code, depending on their seriousness, may prompt a review and, as the case may be, early termination of the contractual relationship with Garanti BBVA.

Furthermore, in the clauses regulating the legal relationship (general terms and conditions, contracts, etc.), Garanti BBVA may require certain suppliers to establish additional controls which, depending on the circumstances, may include the following rights in favor of Garanti BBVA:

- The right to request to see the supplier's policies, procedures or any other document that ensures compliance with the standards set out in this Code. Garanti BBVA may also carry out audits of the supplier itself (or by an external auditor appointed by Garanti BBVA) in order to verify compliance with the commitments set out in this Code or in the underlying contract.
- The right to visit the supplier's facilities in the country where it provides its services.

7. Terms of approval and review

Code of Conduct for Suppliers has been reviewed by the Compliance, Sustainability and Finance areas of Garanti BBVA and approved by the Head of on March 18th, 2024.

Garanti BBVA shall carry out a review and approval process at least once a year, or upon the occurrence of any event requiring a change in this document.

8. Queries regarding the Code

Any queries regarding the interpretation or application of this Code may be sent to SatinAlmaMudurlugu@garantibbva.com.tr.