

# **SHAREHOLDER INFORMATION POLICY**

**09-02-POL-006**

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**Version 00**



**Shareholder Information Policy Summary Profile and Approvals**

**Business Unit** : Financial Affairs and Planning Group – Accounting Department

**Policy Name** : Shareholder Information Policy

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Revision History					
Revision Number	Generation Date	Remarks for Change	Effective Date	Next Date	Revision
0		New Publication			

Approvals		
Approved by	Date	Signature(s)
Financial Affairs and Planning EVP		
Chief Executive Officer (CEO)		
BRCGC		
Board of Directors		

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## **I. INTRODUCTION**

### **1 PURPOSE**

Information policy aims to ensure that relevant competent authorities and shareholders, existing and potential investors, and other stakeholders reach full, accurate, timely, understandable, and analyzable information on equal terms. Such information involves past performance, future expectations, vision, strategy, and objectives of the Bank. Information Policy was issued in compliance with applicable regulations of the Banking Law and the Capital Markets Law, and pursuant to Corporate Management Principles and the principle of transparency. This policy does not lead to the obligation to disclose information classified as business, customer, and Bank secrets.

### **2 SCOPE**

This Policy Document is applicable to all employees and subsidiaries of the Bank.

### **3 CONFIDENTIALITY AND CIRCULATION OF POLICY DOCUMENT**

The contents of this Policy Document are to be treated as confidential. Therefore, they are not to be disclosed or distributed to any unauthorized persons. The signed hard copy of this Policy must be kept in safe custody and must not be copied or revealed to unauthorized third parties without the express written permission of the Financial Affairs and Planning EVP. Distribution to third parties may be performed only in specific/exceptional cases where there is a proper justification for document content disclosure (e.g. Audit requests, special projects with contracted consultants).

Bank employees related to the subject should read and understand this Policy and its relevant appendices so that they can comply, and help others to comply with the policies established. Bank personnel across Alternatif Bank have the responsibility of complying fully with the Policy Document.

### **4 MAINTENANCE OF THE POLICIES DOCUMENT**

This Policy should be reviewed at least annually for updates by the Financial Affairs and Planning EVP. Any employee may recommend changes to the Policy by adhering to their appropriate direct reporting line authority.

All subsequent amendments should also be approved in the same manner through the below:

- Financial Affairs and Planning EVP
- Chief Executive Officer (CEO)

- Remuneration & Corporate Governance Committee of the Board (BRCGC)
- Board of Directors

### **Revision Procedures**

The Policy shall be updated within the scope of the following activities:

1. The date should be updated through the use of the Month and Year on the "Approval" page of this document.
2. The version number should be updated on the approval page and the footer of the document. The version number increases by one with every update.
3. The revision details are highlighted in the "Revision Description" table found on the Version Tracking and Approvals page.
4. The file name should be updated pursuant to the latest version number.
5. The Policy is distributed to the relevant parties and distribution is acknowledged by them.
6. A soft copy of the policy is kept on the bank intranet for distribution.

### **Audit**

Application of policies is reviewed on an annual basis by the Financial Affairs and Planning EVP, and compliance thereof shall be regularly reviewed by the Bank's Internal Audit function. In cases where non-compliance is identified, the Internal Audit function shall review the reasons for such non-compliance and report them as required. Dependent on the conclusions of this review, the need for a revision to the Policies Document may be identified. The Financial Affairs and Planning EVP (or Chief Executive Officer if required) may be asked to issue either general or specific reminders to staff regarding policies established

### **5 POLICY ON NON-COMPLIANCE**

The owner unit is responsible for reporting any non-compliance cases related to this Policy Document. Incidents of non-compliance may also be reported by other unit personnel who have identified non-compliance. Such non-compliance will be reported by the concerned employee to his/her immediate supervisor, who in turn will report the matter to the Financial Affairs and Planning EVP. Moreover, the owner unit will be informed, and the department in question will evaluate non-compliance issues across the Bank, monitoring the implementation of applicable policy.

Bank employees who fail to comply with this policy will be subject to disciplinary action in line with the Disciplinary Policy.

## **6 REGULATORY COMPLIANCE**

This Policy Document is prepared taking into consideration laws and regulations set in the State of Turkey, including instructions issued by the Banking Regulation and Supervision Authority (BRSA) and the Central Bank of the Republic of Turkey (CBRT). In the event that a conflict exists between this Document and regulatory pronouncements, the latter shall take precedence. Amendments to this Document shall then be required to ensure compliance. Moreover, Alternatif Bank shall ensure that it is in compliance with applicable laws and regulations of the countries that it operates in, and if any such conflicts arise, the Legal and Legislation Unit and Compliance Departments should be consulted.

## **7 POLICY SUMMARIES**

The policy contains the principles and procedures for provision of information to shareholders.

## **8 REFERENCE TO RELATED DOCUMENTS**

This Policy Document must be compatible with the following documents of Alternatif Bank:

- Operational Risk Policy
- Information Security Policy
- Corporate Communication Policy

## **II. POLICY**

### **1. Responsibility**

The Board of Directors is responsible for having the Information Policy issued, supervised, and updated as necessary.

### **2. Purposes of and Methods for Provision of Information**

Information is provided with the means of information such as special circumstance disclosures, financial statements and reports, annual and interim activity reports, Alternatif Bank website, presentations, investor meetings and teleconferences, information letters, and press releases. Main public disclosure

methods and tools used by Alternatif Bank, without prejudice to the provisions of the Capital Markets Legislation and Turkish Commercial Code (TCC), are as follows.

- Special circumstance disclosures made on the Public Disclosure Platform (PDP) and general information form of the company
- Financial statements and activity reports disclosed on the PDP
- Corporate website
- Prospectus, circular, declarations, and other documents that should be issued pursuant to the regulations of the Capital Markets Board (CMB),
- Press releases made via written and visual media,
- Announcements and declarations made via Turkish Trade Registry Gazette and daily newspapers.

- **Special Circumstance Disclosures**

Special circumstance disclosures covering internal and continuous information, which should be made in accordance with the Communiqué on Special Circumstances (Communiqué), are sent by the Financial Affairs and Planning Group to the PDP within periods set forth in the communiqué. Special circumstance disclosures can be accessed via PDP website ([www.kap.gov.tr](http://www.kap.gov.tr)).

- **Financial Statements**

Consolidated and non-consolidated financial statements, issued in quarterly periods pursuant to the regulations made by the Banking Regulation and Supervision Agency (BRSA), are submitted to Borsa Istanbul, BRSA, Central Bank of the Republic of Turkey (CBRT), and the Banks Association of Turkey (BAT) within periods set forth in the legislation. These reports are published on Bank websites as well. Year-end consolidated and non-consolidated financial statements are announced without annotation in the Official Gazette by the end of April that follows the relevant year.

- **Annual and Interim Report**

Bank annual and interim reports, issued pursuant to BRSA and CMB regulations, are made available for review by shareholders on Bank websites, Central Registration Agency (CRA) e-Company Information Portal, and e-General Assembly platform ([www.mkk.com.tr](http://www.mkk.com.tr)) at least three weeks prior to the Annual General Meeting.



- **Corporate Website**

The website of our Bank was prepared in Turkish/English in line with corporate governance principles, and it is regularly updated. (<https://www.alternatifbank.com.tr/>)

The website contains detailed information on Alternatif Bank. <https://www.alternatifbank.com.tr/hakkimizda#yatirimciiliskileri> page contains organizational structure of Alternatif Bank, Corporate details, general assembly details, reports, announcements, and credit ratings.

<https://www.alternatifbank.com.tr/hakkimizda#alternatifbank> page contains details on our vision and mission, subsidiaries, and quality policy.

- **Announcements and declarations made via Turkish Trade Registry Gazette and daily newspapers**

Full text of a press release, made by our Bank, is published on our Bank's website as well. Annual General Meeting agenda, meeting resolutions, power of attorney specimens, and all kinds of amendments to the articles of association, including capital increase, are announced to the public in Turkish Trade Registry Gazette. Certain other details, events, and developments about the Bank can be announced to the public via written and visual media outlets and/or social media.

### **3. Ensuring Confidentiality of Internal Information**

The Bank is responsible for taking and implementing all kinds of measures to ensure confidentiality of internal information, events, and developments that have not been disclosed to the public yet. The Bank composes and regularly updates a list of employees with authorization to access internal information pursuant to the relevant legislation. The individuals in question are informed about their obligations regarding internal information under the Capital Markets Law. Individuals with access to internal information must protect the confidentiality of such information until it is announced to the public with a special circumstance disclosure. Necessary measures are taken for individuals such as lawyers, independent auditors, tax consultants, and entities in similar capacities, who may access internal information during the conduct of businesses and transactions on behalf of the Bank, to protect the confidentiality of obtained information pursuant to both the law and provisions of private agreements.

### **4. Executive Responsibility**


Individuals with executive responsibility are those with direct or indirect regular access to internal information pertaining to the Bank, and authorized to make executive decisions impacting future development and business objectives of the Bank. Such individuals comprise Members of the Board of Directors, General Manager, Executive Vice Presidents, as well as other executives that serve in positions equivalent to Executive Vice President or higher.

## **III. ABBREVIATIONS**

<b>Abbreviation</b>	<b>Meaning</b>
<b>Board</b>	Board of Directors
<b>CEO</b>	General Manager
<b>EVP</b>	Executive Vice President
<b>BRSA</b>	Banking Regulation and Supervision Agency
<b>CBRT</b>	Central Bank of the Republic of Turkey
<b>ORC</b>	Operational Risk Committee
<b>MRC</b>	Management Risk Committee
<b>BRC</b>	Board Risk Committee


**IV. ANNEXES**

**Annex A: Policy Revision Proposal Form**

<b>Alternatif Bank</b> 		
<b>Policy Revision Proposal Form</b>		
Reference	Date	
Issued by	Position	
Subjects proposed for revision (if necessary, add photocopies)		
Section No.	Department Name	
Policy No.		
Proposed revisions		
Reasons for proposal of revisions		
Other explanations		
Approved by	Signed by	Effective Date



**Annex B: Policy Distribution and Notification Form**

	
<b>Policy Distribution and Notification Form</b>	
Policy	
Version Number	
Name of Employee	
Date of Notification	
Signature of Employee	