

ANADOLU SİGORTA

GIFTS AND HOSPITALITY POLICY

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1. PURPOSE AND SCOPE

It is a part of the ordinary flow of life that Employees of the Company are in social contact and relationship with the customers, business partners and suppliers. However, it is of particular essence that such relationships should not give rise to any conflict of interest. Under this Policy, it is being described the methods and principles with respect to the gifts given or received, participating in such representation/hospitality activities organized by other entities as well any representation/hospitality activities to be organized by our Company, in order to strengthen business relations.

2. DEFINITIONS

Gift: Those products given and received by and between the persons under business relationship with the purpose of commercial courtesy or gratitude, not requiring any return, material or otherwise.

Conflict of Interest: Means any circumstance occurring in the course of decision making process of the employee or while he/she is performing his/her duty, resulting in the provision of any and all kinds of interests or personal benefit measurable in cash or otherwise, to himself/herself, his/her acquaintances, friends or such persons or entities he/she is in contact with. Such a circumstance should be reported instantly to senior manager and such senior manager is required to take immediately any measures to eliminate this.

İş Bankası Group: Covers Türkiye İş Bankası A.Ş. including any of its subsidiaries, direct as well as otherwise.

3. BASIC PRINCIPLES

1. Even in cases and circumstances in compliance with the laws, employees are not allowed to receive any gifts in breach of the Policy For Combat Against Bribery and Corruption.
2. Employees of the Company are not allowed to accept and receive any gifts from the customers or any business partners that the Company is purchasing products or services from or suppliers nor are they entitled to make any proposals whatsoever in respect of asking for gifts.
3. In certain exceptional circumstances where the will of the employees towards rejection is strictly not accepted by the other party, and therefore arises the risk of jeopardizing the business relationship, it might possibly be accepted any gifts in accordance with business practices and with minor material value.
4. No gifts are to be accepted howsoever from İş Bankası Group companies nor make any offer to ask for gifts.
5. Gifts in cash, precious metals like gold, diamond or gifts that can easily be converted into cash are not to be accepted howsoever.
6. Any non-cash gifts such as free holidays, discount checks, gift checks, extraordinarily high discounts are likewise assessed under scope of gifts and benefits and are not acceptable.
7. Provided these are not asked by the employee in person, any promotional items like agendas, pens, calendars which could be given at periodic basis and having reputational rather than material value could be accepted.
8. Those gifts with minor material value (Item 3) are recorded at the relevant Unit/Department by means of entering the name of the employee, date accepted, sort, amount, party offering the same. Notwithstanding the aforesaid, there is no need to keep any record for those products listed under Item 7 of this Policy.

9. Consideration is given that the gifts so accepted should not generate an impression to the effect that the party giving the gift is being granted any preemptive treatment or any privilege or such a situation should not deteriorate the reputation of the Company.
10. Aforesaid provisions are also valid for the gifts given to family members within framework of the relations generated on grounds of the duties of the employees.
11. Employees of the Company are allowed to take part in any entertainment and dinner organizations with the purpose of representation and hospitality provided they are acceptable in the business world, reasonable and modest.
12. Provided not offered by themselves and being specific to the celebrations on certain days and occasions, managers are allowed to receive gifts of low material value and within ordinary dimensions, from their subordinates direct or otherwise or the subordinates from their affiliated superiors and executives.
13. In respect of any behaviors detected to be in violation of the rules set forth under this Policy, necessary disciplinary sanctions that might be extending to the termination of the employment contract are applicable within framework of the relevant provisions and procedures under Discipline Regulation and Collective Labor Agreement. In case legal conditions are generated, judicial authorities are notified.
14. In the event any entertainment and dinner events, provided they are acceptable in the business world, reasonable and modest, are organized with the purpose of representation and hospitality by the employees of the Company, Representation Spending Authorization Limits are used.
15. If the Company or any party acting on behalf of the Company is hosting any invitation/reception, any and all travel and accommodation costs and expenses of the guests are covered by the guests. Whereas the travel and accommodation costs and expenses to be incurred by the Company's employees as a requirement of invitations and pursuant to the ordinary course of business are paid by the Company. In either of these circumstances, it is possible for the host to incur and bear the entire travel and accommodation costs in case of any reasonable reason therefor.

4. AUDIT

Audit of compliance with the provisions of this Policy is carried out and realized under scope of internal audit.

5. EFFECT

This Policy and any changes and amendments in this Policy enter into effect on the date of approval by the Board of Directors.