

ANADOLU SİGORTA

POLICY FOR COMBAT AGAINST BRIBERY AND CORRUPTION

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PURPOSE AND SCOPE

This Policy covers all employees of the Company as well as any and all persons and entities acting in the name of the Company or providing services to the Company including but not limited to outsourcing companies, suppliers, consultants, external auditors and representatives. The purpose of this Policy is providing for compliance of the subject matter parties with anti-bribery and anti-corruption regulations as well as the ethical and professional principles in this respect.

DEFINITIONS

Corruption: Means claiming or offering, providing or accepting by any one of the stakeholders any unjust proceeds or any and all kinds of illicit interest leading to deviation in performance of the duties under his/her responsibility in a legally compatible manner and order.

Bribery: Means providing of any benefits either directly or otherwise, to the individual in person or someone else to be designated by the former in order to do anything or refrain from doing the same in connection with the performance of his/her duty. Benefits to be deemed as bribery could be in a wide range of forms such as cash, instruments that could easily be converted into cash, gifts, invitations or tickets to events, acquitted debts, donations aiming for assistance.

BASIC PRINCIPLES

1. The Company has set forth and specified within framework of international applications, major areas of risk that acts of bribery and corruption could be practiced as:
 - Gifts and hospitality events;
 - Donations and sponsorships;
 - Payments for facilitation;
 - Companies for outsourcing of services and business partnerships;
 - Abuse of title or job position.

while the principles under this Policy are being generated, risk areas are taken into consideration.

2. No payments howsoever are allowed to be made to any government official or any other party with the purpose of influencing any decision in relation with the continuation of the Company's business activities or could be to the interests of the business entity; no gifts are to be given, no personal payment, subvention or donation are allowed to be made.
3. No political grants/donations could be made by the Company and/or the Company is not allowed to use the means and facilities in its possession with the purpose of supporting any political candidate or entity.
4. Gifts given by the Company could not bear such character with the aim of impressing the relevant parties of any tender process or contract that the Company is a party to.
5. It is not tolerated for the Company's employees to propose any facilitation payment howsoever in respect of their relations with third parties.
6. Donations or sponsorships of the Company are required to be in conformance with the legislations as well as the internal regulations of the Company.

7. Employees of the Company are not allowed to claim or accept any gifts from any third parties including İş Bankası Group companies which are in breach of the relevant provisions of Gift and Hospitality Policy nor perpetrate in any acts of the same meaning. If any employee of the Company believes that his/her life or freedom is/are at risk/jeopardized due to such improper payment request, he/she should receive or make the payment and immediately report the situation to his/her direct supervisor.
8. Employees of the Company are not allowed to use their duties and authorities to the benefit of themselves, their family members or any third parties in order to provide any personal and private interest whatsoever.
9. Employees of the Company are not allowed to provide or cause to be promised any interest under any name and title whatsoever, to himself/herself, his/her family members or any third parties either directly or through intermediaries either by mutual consensus, deception or forcing as a consequence of misusing the job position or title knowingly or willingly.
10. Those employees who refuse to provide any bribe or informing in goodwill any actions or attempts in breach of this Policy acting under principles of honesty and transparency are not subjected to any penalty and/or ill treatment in connection therewith.
11. In respect of any acts and deeds determined to be in breach of the rules set forth under this Policy, within framework of the relevant provisions and procedures of the Discipline Regulation and Collective Labor Agreement, required disciplinary sanctions which might lead up to termination of the employment contract, are implemented. In case legal conditions are generated, judicial authorities are notified.
12. Before establishing any business relationship with the parties specified under the section of this Policy with the heading "I. Purpose and Scope", investigation and condition assessment are made in respect of matters regarding bribery and corruption practices. The Company refrains from establishing any relationship with any persons or entities realized to have been referred to the legal authorities such matter to the effect that they have perpetrated in any bribery or corrupt practices. Whereas in the event it arises any bribery or corruption allegations concerning persons/entities that the Company is in relation with and such allegations are finalized under judicial order, such business partnership is instantly terminated.
13. It is of particular essence that any and all persons and entities acting in the name of the Company or providing services to the Company including outsourcing companies, suppliers, consultants, external auditors and representatives are required to comply with the legal regulations as well as any and all anti-corruption laws currently in effect.
14. The Company provides regular training to its employees in respect of Policy For Combat Against Bribery and Corruption. Employees sign a document to the effect that they are agreeing to the consequences of compliance with and acting in violation of the provisions under the Policy For Combat Against Bribery and Corruption.

AUDIT

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

EFFECT AND REVIEWING

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

REFERENCES

- Discipline Regulation
- Collective Labor Agreement