

ANADOLU SİGORTA**ETHICAL RULES AND IMPLEMENTATION PRINCIPLES POLICY****CONTENTS**

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1. PURPOSE AND SCOPE

As Turkey's first national insurance company, Anadolu Anonim Türk Sigorta Şirketi ("Anadolu Sigorta" or "The Company") adopts and applies in an uncompromising manner principles of superior professional ethics for the sake of protecting and upgrading the reputation of both the Company as well as the sector.

The purpose of this document comprises of setting forth and specifying the professional rules of ethics and principles of application required to be adhered to by the Company in its relations with its customers and other stakeholders further and in addition to the existing laws and regulations, including any measures to be taken in case of non-congruence with such principles; and serve as basis to the sanctions applicable by the Company. In the event it is acted in departure from the provisions under such principles, serves as basis for the sanctions to be applied by the Company under the Discipline Regulation as well as Collective Labor Agreement.

All Company employees, managers and Board of Directors Members ("Employees") comply with these principles.

2. GENERAL PRINCIPLES

All Employees of the Company conduct and perform their duties within framework of the general principles listed and specified hereinbelow with the purpose of maintaining trust and persistence in the insurance sector, upgrading service quality, avoiding and preventing unfair competition as well as operations and applications which might result in economic losses, enhancing social benefits.

Ethical principles are not limited to those listed under this document. Any and all acts similar to these acts are included in the rules required to be complied by the Employees.

2.1. TAX POLICY

- The Company pays any taxes arising from its operations in accordance with the terms and conditions specified under the legal regulations.
- The Company is not allowed to perpetrate with any illegal transactions or dispositions in order to avoid and abstain from its tax-related obligations.

2.2. COMMERCIAL AND FINANCIAL RECORDS

- Any and all books, commercial and financial records, accounts and financial statements of the Company are kept and maintained in accordance with the accounting principles and the relevant period pursuant to the national and international standards as well as legal regulatory practices; they reflect the transactions of the Company in a proper manner.

2.3. PROTECTING COMPANY ASSETS

- It is the responsibility of all Employees to protect and use effectively all assets of the Company in cash and in kind.
- All assets of the Company are used in accordance with the primary business goal.

2.4. CONFORMANCE WITH RULES OF COMPETITION

- The Company envisions unfair competition practices as a threat against the future of the sector and believes in the vital role of free competition for sound and robust development of the sector.
- In all of their operations, Employees of the Company act in compliance with the legislations concerning competition.
- In relations with the public entities, legal obligations are performed and fulfilled in parallel to the principles of honesty, accountability and transparency within framework of the principles set forth and specified under the laws and regulations; any information and opinions requested are duly provided.

2.5. PREVENTING LAUNDERING OF ILLICIT MONEY AND FINANCING OF TERROR

- The Company performs in full and on time such requirements towards preventing laundering of illicit money and financing of terror; follows-up the relevant national as well as international legislations in relation therewith; cooperates to this end with the competent entities and organizations.

2.6. COMBAT AGAINST BRIBERY AND CORRUPTION

- The Company adopts the policy of zero tolerance for bribery and corruption.
- The Company has a Policy for Combat Against Bribery and Corruption published in relation with this matter.

2.7. GIFTS AND HOSPITALITY

- The Company has a Gifts and Hospitality Policy published in relation with this matter, which is required to be complied with by all Employees.

2.8. HONESTY

- It is acted in an honest manner in the relations with customers, agencies including employees and shareholders, group companies, suppliers, in short with any and all persons, entities and institutions.

2.9. TRANSPARENCY

- In the operations carried out and realized, transparency and accountability are kept and maintained at the ultimate possible level.

2.10. ACTING IN COMPLIANCE WITH LEGAL REGULATIONS AND COMPANY RULES

- It is of essence to act in accordance with the legal regulations in practice, primarily those in relation with the insurance business.
- In the course of operations, it is of critical essence not to use the advantages granted and enabled to the sector within framework of the laws, with the purpose and intent of obtaining benefits in such a way and manner conflicting with the matters listed under the legal regulations concerning insurance business and described under the said principles, however they might be formally in accordance with the laws.
- It is acted in accordance with such principles and methodologies originating from the international initiatives that the Company has subscribed to or declaring support therefor.
- Employees are not allowed to be involved with any behavior and activities binding for them which are in departure with the rules imposed by the authorized bodies of the Company in respect of the functioning of the Company. They are not permitted to perpetrate with any acts and deeds not in compliance with the interests and welfare of the sector.

2.11. POLITICAL BAN AND DONATIONS

- The Company does not provide support to any political party or candidate.
- No donations or support whatsoever are to be made and provided to the political parties, candidates on behalf of the Company.

2.12. MEMBERSHIPS IN ASSOCIATIONS, FOUNDATIONS AND OTHER NON-GOVERNMENT ORGANIZATIONS

- The Company is entitled to become corporate member in any associations, foundations, professional unions, chambers and such similar non-government organizations established in accordance with the laws currently in effect and could be represented before these types of organizations through individual memberships of its managers. Company managers are entitled to assume duties in the management of these types of organizations in representation of the Company.

- Employees are allowed to become members individually in any non-government organizations like associations, foundations, professional unions and chambers established in accordance with the laws currently in effect.
- Employees could serve in the social security and assistance funds, associations founded by the Company, its Employees or jointly by both.
- Without permission of the Company, Employees are not allowed to assume duties in the management boards of cooperatives.

2.13. SUPPORTING HUMAN RIGHTS, DIVERSITY, EQUALITY AND COMBAT WITH DISCRIMINATION

- Anadolu Sigorta identified with its character of being Turkey's School of Insurance Practices, for the sake of developing human factor primarily presents its Employees an equitable, equalitarian and secure work ambient where human and employee rights are preserved.
- The Company respects and supports human rights declared at international scale.
- In none of its operations is the Company allowed to be and become a party to human rights violations. While performing their duties, Employees act in due consideration of the impacts of these duties on human rights; circumstances where there violation is suspected are immediately advised to the relevant managers concerned, ensuring that the necessary measures and dispositions are taken and adopted.
- In operations of the Company, child abuse, forced and involuntary labor practices are not tolerated.
- It is provided in detail in the Sustainability Policy, such other rules adopted by the Company in relation with the work life and applications realized.

2.14. RESPONSIBILITIES TOWARDS THE ENVIRONMENT

- Aspects of the Company operations regarding the environment and climate are regulated under Environment and Climate Change Policy.

2.15. SOCIAL BENEFIT AND SOCIAL RESPONSIBILITY

- In all of its operations and activities, the Company attends and pays respect to social benefit, ensures that any and all measures to be taken to this effect are implemented in full and on time.
- The Company takes care in providing support to social and cultural events with an awareness of social responsibility.

2.16. NEUTRALITY

- Employees do not discriminate amongst agencies, suppliers, other business partners and customers, avoid prejudiced behavior and also refrain from any and all kinds of discrimination in respect of services provided.

2.17. RELIABILITY

- In respect of services provided to all parties in relation with, clear, understandable and correct data and information are given; the parties are fully and accurately informed about their rights and obligations.

2.18. CONFLICTS OF INTEREST

- Adverse relationship between the personal interests of individuals and interests of the Company is referred to as a circumstance of conflict of interest. All of our Employees are in a tendency to adopt decisions towards their activities and dispositions that would result in the best possible manner for the interests of the Company rather than their personal benefits.
- Employees are not allowed to use their power and authority for employment of their family members or close acquaintances or in favor of providing diverse benefits hereto.
- Without permission of the Company, Employees are not to be employed at any other work.

- Since it is a public company, it is of essence that equal treatment is implemented amongst shareholders of the Company.

2.19. CUSTOMER RELATIONS

- In respect of the relations with the customers, it is never to be departed from the line of courtesy, dignity and professionalism; it is of primary essence to preserve and maintain reliability in the eyes of the customer.
- Data with respect to the terms and conditions for the products and services are communicated to the customers clearly and in full; it is not allowed to make any misleading advising, directing or forcing in order to realize sales.
- Customer complaints are concluded in the shortest possible period of time by taking interests of the customer into consideration.

2.20. CONFIDENTIALITY OBLIGATION

- Employees are not allowed to disclose without permission any confidential data not expected to be known by the general public.
- Within framework of the principle for confidentiality of personal data, Employees pay respect to the confidentiality of such data provided by their customers or generated by the Company; preserve the intimacy thereof; and avoid from disclosing the same of the customers or other third parties.

2.21. OPERATING HARMONY AND WORK AMBIENT

- It is of particular essence that all Employees act in a manner befitting the reputation of the Company in all of their relations both within the Company and otherwise.
- The Company takes care to conduct its operations by considering the requirements of our country's economy as well as its own profitability.
- Company's managers work for increasing the motivation of Employees and providing services under more favorable terms. Managers act neutrally, balanced, equitably and prudently in respect of their dispositions towards the Employees. In their mutual relationships and communication, managers and employees prioritize respect and human dignity.
- The Company promises and covenants to provide its employees a healthy and secure work ambient. Managers of the Company are obliged to take and adopt any necessary vocational health and safety measures required for fulfillment of such covenant. Vocational health and safety performance is duly recorded.

2.22. USING THE SOCIAL MEDIA

- Employees are not entitled to share in their personal social media accounts, forums, blog pages and such other similar public open Internet or mobile application platforms such company data and particulars other those announced through the official channels of the Company (particularly data not verified to be true and correct, contents liable to violate any copyrights, contents which might lead to negative ideas and opinions about the Company and its services or give rise to uncertainties and incongruities, or such other written, visual or multimedia contents contradicting with the principle of confidentiality).
- Employees are not allowed to share in any media any statements, writings, notices, advertisements which might cause generation of negative images both about the employees of the Company or employees of other companies in the sector; nor make any implications to that effect.

3. IMPLEMENTING OF THE ETHICAL RULES

3.1. MANAGING CONFORMANCE WITH ETHICAL RULES

- Personnel Committee is responsible, by assuming its identity as Ethics Board, of generating the ethical rules of the Company, revising such rules in circumstances deemed necessary and supervising the implementing of the same before the Senior Management, review any notices towards breach

of Company's ethical rules, in the event of detecting any such breach, ensuring that all necessary administrative and/or legal actions are duly taken.

- Compliance with the Ethical Rules and Implementation Principles is under joint responsibility of all Employees of the Company.
- The Company monitors regularly compliance with Ethical Rules and Implementation Principles through its units under internal systems. Results obtained are reported to Senior Management at regular intervals. Data and information concerning the business ethics practices and performance of the Company are announced to the general public through sustainability reports.

3.2. CHANNELS OF NOTICE AND ASSESSMENT PROCESS

- All Employees are obliged to make any necessary notices in circumstances where any doubt towards violation arises or information is received towards violation of Ethical Rules and Implementation Principles.
- Any notices and advices could be made to the relevant company executives, Board of Auditors, Personnel Committee.
- Assessments and investigations are conducted within framework of the respective principles of confidentiality and neutrality.
- The Company believes and has faith in settlement of any problems under honesty and goodwill. No retaliation is applied towards any employees or stakeholders who transmit and communicate in accordance with the procedures specified, their reasonable doubts arising under these principles. Similarly, no employee is to be held liable towards any commercial damage suffered by the Company as a consequence of his/her acting in compliance with the rules of work ethics such as refusing and denying to be and become a part of bribery and corrupt practices. A treatment of this type is assessed as express violation of the Ethical Rules and Implementation Principles.