

Anadolu Hayat Emeklilik A.Ş.

Anti-Bribery and Anti-Corruption Policy

1. Definitions

Bribery: Refers to obtaining of benefits by a person either directly or indirectly in order to do or not to do an act in relation to the performance of his duties.

Corruption: refers to demanding, offering, giving or receiving any kind of unjust gain or unlawful benefit by any stakeholder that obstructs the fulfillment of his responsibilities in compliance with the law.

2. Purpose

This policy aims to enable the compliance of the all employees and participations of Anadolu Hayat Emeklilik (the Company), the individuals and corporations that act in the name of or provide services with the effective antibribery and anti-corruption regulations.

3. Responsibilities

The Head Office is responsible for revisions and amendments of this policy. This policy is reviewed at least once a year, if it's required.

4. General Principles

- 4.1. 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.
- 4.2. The Company is not allowed to use the means and facilities in its possession with the purpose of supporting any political candidate or entity.
- 4.3. 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.
- 4.4. It is not tolerated for the Company's employees to propose any facilitation payment howsoever in respect of their relations with third parties.
- 4.5. Donations or sponsorships of the Company are required to be in conformance with the legislations as well as the internal regulations of the Company.
- 4.6. Employees of the Company are not allowed to claim or accept any gifts from any third parties 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.
- 4.7. 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.
- 4.8. Necessary disciplinary action is imposed and upon the occurrence of legal terms, judicial authorities is notified for the employees who consciously or intentionally misuse their title or duties and who promise to provide any kind of benefit under any name or title either directly or via an intermediary for themselves, their families or third parties by mutual agreement, inducement or compulsion.
- 4.9. The Company pays attention not to establish 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 corruption practices. If there is a relationship established in that type and if the claims are proven with a judicial decision, this business partnership shall be terminated immediately.
- 4.10. It is of particular essence that any and all persons and entities acting in the name of the Company including persons, suppliers or contractors, must comply with legal regulations and all applicable anti-corruption laws.

5. Enforcement

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