

Anadolu Hayat Emeklilik A.Ş.

Gifts And Hospitality Policy

1. Definitions

Conflict of interest: Refers to any kind of economic or personal interests that are against the interests of the Company or that might be against the interests of the Bank in scope of changing conditions, that may influence the employee during his/her decision making process or while fulfilling his/her duty. This kind of a situation must be immediately reported to the supervisor of the employee and the supervisor must immediately take the necessary measures to eliminate such conflict of interest. In some situations, the actions of the employee that may negatively affect the employer may aim at obtaining benefits not for himself, but for a relative or third parties.

Gift: Refers to products that are given by and among the persons, who are generally engaged in business relationships, with the purpose of commercial courtesy or gratitude, not requiring any return, material or immaterial.

2. Purpose and Scope

It is natural and acceptable that the employees of Anadolu Hayat Emeklilik (the Company) build social relationships with their customers. However, it is essential that these relationships do not result in any conflicts of interest.

This policy sets forth the legitimate framework of the gifts given or received and the hospitality activities organized in order to strengthen business relationships.

3. Responsibilities

Head Office is responsible for updating and executing this policy . At least once a year, this policy is reviewed and updated if necessary.

4. General Principles

- 4.1. Even where it complies with the law, the employees shall not give or receive gifts for business purposes in violation of Anti-Bribery and Anti-Corruption Policy.
- 4.2. The employees of the Company shall not accept any gifts from their customers or suppliers from which their department purchases goods or services and shall not make any offers to request any gifts.
- 4.3. Provided these are not asked by the employee in person, any gift or promotional items like agendas, pens, calendars which could be given at periodic basis and having reputational rather than material value could be accepted.
- 4.4. In exceptional situations, where the will of the employees for not accepting the gift is not recognized by the other party and this poses a risk of damaging the business relationship, gifts that are not of high monetary value may be accepted.
- 4.5. The gifts, which are not of high monetary value, shall be recorded at the related department by specifying information such as the date of acceptance, type and value of the gift and the customer who has given the gift. On the other hand, there is no need to record the promotional items or gifts that have a symbolic value rather than a monetary value.
- 4.6. Gifts in cash, precious metals like gold, diamond or gifts that can easily be converted into cash are not to be accepted howsoever.
- 4.7. 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.
- 4.8. The aforementioned provisions shall also apply to gifts given to family members in scope of the relationships of the employees that are built as a result of their duty.
- 4.9. The employees of the Bank may participate in entertainment and dinner organizations with the aim of representation and hospitality, provided that these are acceptable in the business world, reasonable and modest. When the employees of the Company organize entertainments or dinners with the aim of representation and hospitality, Authorization Limits provided by the Company shall be used.
- 4.10. In case the Company or any party acting on behalf of the Company is hosting the organization, the travel and accommodation expenses of the guests shall be covered by the guests and the travel and accommodation expenses of the Company's employees to be made for business purposes shall be met by the Company. In necessary, reasonable or explicable situations (training activities, corporate communication organizations, etc.), the costs may be paid by the Company or the party sending the invitation.
- 4.11. Provided not offered by themselves, managers are allowed to receive gifts of low material value from their subordinates directly or indirectly.

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.