

# Anadolu Hayat Emeklilik A.Ş.

## Supplier Code of Conduct

### 1. Introduction and Scope

As Anadolu Hayat Emeklilik (the Company), minimizing the adverse environmental and social impacts of our activities while maximizing their positive effects is one of our top priorities. In achieving this goal, we are aware of the significant role that long-term strategic partnerships with our suppliers will play.

The Supplier Code of Conduct sets forth the fundamental principles and guidelines that we expect all of our suppliers (including insurance agencies) to adhere to in achieving this goal. In cases where a supplier utilizes subcontractors, the supplier is expected to observe that its subcontractors act in accordance with these principles. The Company reserves the right to terminate contracts with suppliers who do not adhere to these principles.

The Supplier Code of Conduct is established in compliance with legal regulations, our Company policies and regulations, as well as international regulations and principles. The prominent Company policies and implementation principles are outlined below. Our suppliers and all other stakeholders can access these documents through our corporate website, [www.anadoluhayat.com.tr](http://www.anadoluhayat.com.tr).

- Anadolu Hayat Emeklilik Sustainability Policy
- Anadolu Hayat Emeklilik Human Rights and Human Resources Policy
- Anadolu Hayat Emeklilik Anti-Bribery and Anti-Corruption Policy
- Anadolu Hayat Emeklilik Gifts and Hospitality Policy
- Anadolu Hayat Emeklilik Ethical Rules and Implementation Principles Policy

### 2. Purpose

The Supplier Code of Conduct includes the general principles that all current and prospective suppliers of the Company must adhere to. In order to comply with these principles, suppliers are required to implement necessary processes and policies and regularly inform their employees to ensure the continuity of compliance with the principles.

### 3. General Principles

#### 3.1 Compliance with Law and Regulations

**3.1.1** Our suppliers must adhere to laws, regulations, and Company policies and regulations communicated to them.

#### 3.2 Human Rights and Equality

**3.2.1** Our Company's suppliers are expected to operate in compliance with our Company's "Human Rights and Human Resources Policy" and the human rights policies and principles outlined below.

- Activities are carried out in accordance with the fundamental principles such as the Universal Declaration of Human Rights of the United Nations and the International Labour Organization's core principles of labor rights, human rights, and social justice.
- Safe and healthy working conditions must be provided.
- Equal opportunities are provided to employees.
- Compliance with legal regulations, especially regarding working hours and overtime, is ensured.
- No discrimination is made according to race, religion, language, sect, gender, physical disability, age, cultural, and social class differences.
- No worker is allowed to work below the age limit defined in the legal legislation.
- No one shall be subjected to forced labor or compulsory labor under Article 4 of the European Convention on Human Rights.

#### 3.3 Prevention of Conflict of Interest and Commercial Integrity

**3.3.1** Our Company has the "Anti-Bribery and Anti-Corruption Policy" and the "Gifts and Hospitality Policy" which are published on the corporate website. Employees of our Company cannot accept, directly or indirectly, any gift, gratuity, donation, business offer, sponsorship, or similar benefit or privilege transaction that would constitute a violation of the policy provisions. Our suppliers are expected to avoid behaviors that would contravene the principles outlined in these policies and the Company's "Ethical Rules and Implementation Principles Policy".

**3.3.2** The spouses and blood relatives up to the third degree and their relatives up to second degree, adopted children, adopters, and their legal entities, cannot participate directly or indirectly in the purchases and sales to be made by the Company and submit offers. Such unauthorized participation shall not be taken into account by the executive body to make the purchase.



**3.3.3** Any action that would hinder the fair, impartial, transparent, and accountable conduct of the procurement process of products and services is prohibited. If it is determined that such actions have been committed by the candidate company/companies, they will be excluded from the procurement process.

**3.3.4** Regular investigations are conducted to determine whether there are new companies producing/marketing the products or services for which our Company continuously purchases. During these investigations efforts are made to obtain information about the business ethics and commercial reputation of the companies to the extent possible. Companies that are not loyal to their commitments, those who are found to be involved in bribery or corruption incidents that have been reported to legal authorities or have problems in providing quality products and services are not included among the approved companies.

**3.3.5** Prevention of corruption and bribery is fundamental in the activities conducted by our Company, and within this scope, maximum care is taken for transparency, accountability, and impartiality in procurement activities. All our suppliers are required to act this basis, whereby they:

- Shall not offer any payment, gift, gratuity, donation, business offer, sponsorship, preferential treatment, or any other benefit, directly or indirectly, to influence the decisions of third parties, public officials, authorities or our Company's employees, with the intention of obtaining an unfair advantage or benefit.
- Shall not accept gifts, payments, or personal benefits from our Company's employees or other third parties.
- Shall maintain proper accounting records for all transactions, revenues, and expenses.

### 3.4 Sustainable Environment

In accordance with our Sustainability Policy, our Company aims to measure and minimize the negative environmental and social impacts resulting from its activities. In line with this, we expect our suppliers to operate in accordance with the principles outlined in our Company's Sustainability Policy and to minimize any negative environmental and social impacts of their activities if present.

In procurement processes suppliers that operate with more environmentally and socially conscious systems are given preference In this context, we expect our suppliers to:

- Have a written environmental/sustainability system in line with the size and nature of their activities to prevent, reduce, and control negative environmental impacts arising from their activities,
- Comply with legislation and regulations regarding environment protection and the transportation of hazardous substances,
- Assess the environmental impacts of their activities and take necessary measures to minimize any negative impacts on the environment during their operations,
- Be sensitive towards the preservation of biological diversity, sustainable natural resources, cultural heritage, and areas under sensitive protection.

### 3.5 Avoidance of Unfair Competition

Our suppliers must comply with competition laws and refrain from practices that hinder competition or lead to unfair competition. In this regard, our suppliers should avoid, without limitation, the following practices:

- Engaging in negotiations or making contracts with competitor companies on issues such as price, product, production level, customer distribution, market or market share, or boycotting specific customers or suppliers, or any other practices that obstruct competition.
- Abusing dominant position.
- Damaging the reputation of competitor companies.

### 3.6 Anti Money Laundering and Combating the Financing of Terrorism

Our Company takes and enforces strictly the necessary measures to execute the obligations imposed by national and international legislation; in this context, especially the legislation on anti-money laundering, prevention of financing of terrorism, prevention of financing of the proliferation of weapons of mass destruction and avoiding establishing business relations with persons, institutions and organizations included in the sanctions lists.

## 4. Legal Regulations

In the supplier's financial and operational records, as well as their internal and external reporting, compliance with regulatory requirements, accuracy, accountability, precision, and reciprocity principles must be ensured. Full compliance with the legislation and the Company regulations is required in all activities and transactions of the supplier's employees and intermediaries.

#### 4.1 Data Privacy and Security

Any information about the Company, Company customers, and Company employees, as well as any information obtained within the scope of business relationships, is of a confidential nature. The principles regarding the storage and transfer (access to information) of confidential information are subject to legal regulations and contracts governing the legal relationship between our Company and our suppliers. We expect our suppliers to exercise maximum care in preserving the confidentiality, integrity, accessibility, and protection of personal data for any information acquired through the business relationship.

#### 4.2 Audit and Information Document Request

**4.2.1** Anadolu Hayat Emeklilik reserves the right to audit its suppliers by itself and/or through independent auditors limited to the service it has received. Findings identified during the audits are communicated to the suppliers, and immediate rectification of the incident/issue causing the finding is requested. If the finding is not rectified within the specified period, the Company reserves the right to suspend the service it receives from the supplier at any time.

**4.2.2** Suppliers are obliged to provide the requested information and documents in a timely and complete manner. These information and documents must be prepared and stored to reflect accurate data.

#### 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.