

Anadolu Hayat Emeklilik A.Ş.

Ethical Rules and Implementation Principles

1. Purpose and Scope

This policy establishes the ethical principles of Anadolu Hayat Emeklilik A.Ş. (the Company) and outlines its employees' responsibilities and working principles.

2. Ethical Principles

The Company which is a public company operating in the branches of private pension and life insurance; endeavors to reach its productivity, profitability and constant growth target, by complying with the legislation and the regulations in this matter and also, the corporate culture and business ethics of the group which it is involved in, and the corporate awareness created within the framework of the “ethical rules” specified below. Employees of the Company at all levels and its agents shall be obliged to comply with the ethical rules and to ensure, in all their activities, compliance with these rules.

General framework in conducting operations of the Company; is to act by complying with the legal regulations, being honest, impartial, reliable, transparent, respecting human rights and the environment and with a consciousness of social responsibility. The Company’s employees and agents shall observe the following general principles:

Honesty

When conducting their activities, they shall stick to the principle of honesty in all their relations.

Impartiality

In all their actions and transactions, they shall not make any discrimination, they avoid any acts of prejudice.

Reliability

In all services and transactions, they give clear, comprehensible and correct information to the customers, in a concept of mutual understanding; they perform customer services on time and completely.

Transparency

In the information provided to the customers, they shall observe that such information should be simple and easily comprehensible; they shall keep transparency at the highest level possible, relating to the activities they conduct.

Respect for Human Rights

With the consciousness that respect for human rights is a precondition for being a sustainable society, they observe human rights in all their activities.

Respect for Environment

In all activities to be performed, they shall observe protection of the environment and natural resources.

Social Responsibility

With an awareness of social responsibility, they shall be attentive to providing support for social and cultural events.

Compliance with Legal Regulations

The Company regulate activities in accordance with national and international legislation along with the instructions and policies applicable to our internal practices.

All measures to prevent illegal transactions or intermediation in these transactions are taken and implemented by the Company, it cooperates with other institutions in this regard, and personal data and information that are Company and customer secrets are protected in accordance with the legislation within the framework of information security policies.

3. Legal Regulations

Full compliance with the regulations applicable to the Company and internal rules is required in all activities and transactions of company employees and intermediaries.

4. Customer Relations

Following principles shall be observed in the relations with the customers;

4.1 Informing the Customers

Prior to an agreement and during the term of an agreement, information shall be provided to the customers on time and correctly, regarding the products and services offered; it shall be abstained from providing any misleading or incomplete information.

Attention shall be paid at recommending products suitable for the customers' needs and the customers shall be informed about the advantages and disadvantages of the recommended products, compared to other products.

4.2 Customer Secrets and Safety

Except for the information and documents required to be given to authorized persons and authorities legally, information sharing made within the scope of relevant legislation and cases where there is explicit consent of the customers; all kinds of information and documents relating to the customers shall be kept confidential and carefully.

Measures shall be taken intended to ensure transactional safety at all kinds of service environments and to avoid any suffering by the customers.

4.3 Avoidance of Discrimination and Service Quality

High quality services shall be offered to all customers and while providing these services, any kinds of discrimination shall be avoided. However, determining the target group and differentiating organizational structure and product range according to the target group or having different

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approaches to risky customers, shall not be construed as making discrimination among the customers.

4.4 Customer Complaints

Necessary measures shall be taken for the purpose of rectifying, and not repeating, any incorrect practice which cause customer complaints.

5. Social and Corporate Interests

The Company's employees and agents shall be obliged to observe the reputation (financial, physical and intellectual property) of our country, the society, industry, the group in which the Company is involved and of the Company itself; and to conduct maximum care and attention in order to take necessary measures / to ensure that necessary measures are taken for the purpose of avoiding any damage to social and corporate interests.

6. Enforcement of Ethical Rules and Reporting of Non-Compliant Behavior

The Company's employees and agents shall be obliged to apply ethical rules and to have them applied, to arrange their workflows accordingly. The Company, its employees and its agents may not waive these rules in any decision and regulation.

The fundamental principles and implementation principles regarding notifications to be made to the Company in cases of violating ethical rules or suspected violations are given below.

6.1. Fundamental Principles

a) All employees and agents are obligated to report any behavior or transaction contrary to the Ethical Rules and Enforcement Principles Policy or when there is suspicion of such behavior through the communication channels provided below. Notifications are taken seriously and handled and finalized swiftly. In the case of a violation of the regulations, the enforcement of all necessary sanctions, including the termination of employment contract as per the legislation, may be considered. Judicial bodies are notified in the case that the applicable legal requirements are met.

b) Employees who make notifications about the above-mentioned actions in good faith will not be subjected to practices such as disciplinary punishment, disadvantageous treatment compared to peers, or direct or indirect retaliation, solely because of their notification.

c) The Company takes all the necessary precautions, including primarily those related to confidentiality, to prevent its notifying employees from becoming the target of any mistreatment of other employees or third parties. However, the Company's rights arising from the legislation, contracts to which the Company is a party and the Company's internal regulations, are reserved for the employees and third parties who make notification in bad faith.

6.2. Practices

a) The confidentiality of the notifications is essential and the identity of the person making the notification is kept confidential unless he/she wishes it to be disclosed. Even if the Company's employee conveys his/her suspicion about the non-compliance in question to his/her own manager or to the authorized units of the Company, the rules regarding the confidentiality of the

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notification still apply. Confidentiality principles apply to notifications made by third parties as well.

b) Notifications can also be made anonymously. However, anonymous notifications may make it difficult to reveal the acts and/or perpetrators that violate the legislation and it may not be possible to take protective measures for the notifying party. No liability can be attributed to the Company in such cases.

c) In order to take action to fulfill the needs of the notifications, the notification must be sufficiently clear and detailed and contain the necessary information. Claims with ambiguous statements or without explanations that demonstrate sufficient suspicion may lead to inconclusive investigations. In such cases, notifying parties are obliged to provide sufficient explanation and information to the Company upon request.

d) Employees or third parties who suspect that an act is in violation of the regulations have the right to consult their manager or the responsible unit specified in the "Notification Channels". In the case of consultation, the procedures and principles regarding notification, particularly confidentiality, apply. The notification must be made through the Ethics Line through the specified communication channels. The Company's employees and/or units receiving notifications outside of these channels are obliged to share the relevant notification with the communication channels specified, without delay and within the framework of confidentiality principles.

e) As a result of the impartial and independent evaluations of the Board of Inspectors regarding the notifications shared through the Ethics Line to share the notification with the relevant units of the Company for inspection or finalization thereof. The Board of Inspectors submits the reports to the Human Resources and Training Department when necessary. The Human Resources and Training Department finalizes the submitted reports within the scope of its duties and authorities or submits it to the Company's Executive Board or Board of Directors for finalization.

f) All notifications with sufficient explanation and information are handled with due care by the Company. The notifying party is informed about the notification being evaluated, through the contact information he/she shared.

Notification Channels - Ethics Line:

E-mail: etik@anadoluhayat.com.tr

Phone: +90 212 317 71 31

Mailing Address: Anadolu Hayat Emeklilik A.Ş. Ethics Line İş Kuleleri Tower: 2 Floor: 20 34330 Levent- Beşiktaş/ISTANBUL

Notification Channels are published on the Company's website and are open to the access of our Company's employees, customers and all other relevant parties.

7. Order of Records and Documents

It shall be ensured that in the Company's financial and operational records and internal and external reporting processes; principles of accuracy, accountability, preciseness and mutuality shall be taken as the basis.

8. Shareholders, Company's Employees, Business Partners, Agents

- The Company shall be obliged to offer its shareholders, regardless of the size of their shareholding, all of the rights and benefits defined in the "Company's articles of association", in the most correct, swift and transparent manner.
- The Company shall be obliged to act in a fair, reliable, prudent and responsible manner, to its insured persons and private pension system participants, its agents, competitors and employees.
- The Company shall respect individual rights and freedoms of its employees, individual talents and success of its employees is the key to the Company's success. For this purpose, in order to provide professional and technical training, all employees shall be offered with all kinds of training opportunities.
- The Company shall be obliged to take and implement all kinds of measures in a healthy and secure working environment, in order to ensure that its employees perform their duties and fulfill their responsibility with a comprehension of serving at the highest level.
- The Company shall be obliged to implement necessary regulations for the purpose of preventing acquisition of internal information, to impose necessary sanctions against those who fail to comply with said regulations, within the framework of the ethical rules
- The Company and the employees may not disclose the secrets relating to its shareholders, agents, employees and customers, except for legal requirements; may not use them in favour of itself in a manner distorting equality in competition in the industry.
- Employees of the Company, as a requirement for maximising their productivity, have the consciousness of observing harmony of working at the works they perform, to improve their technical and professional competences and to act in mutual respect, politeness and attention.
- Employees of the Company may not accept any gift from an insured person, private pension system participant, supplier or agent. Senior management of the Company shall be obliged to set the principles regarding giving gifts, within the framework of the Company's interests, without any compromise regarding the principles of transparency and respectability, with the intention to avoid corruption; and to have such principles implemented. These matters are managed under "The Gifts and Entertainment Policy".
- The Company's employees shall examine carefully the complaints made by insured persons, participants of private pension system, agents and any other persons/institutions, and finalise them as soon as possible within the scope of principles on information policy.
- The Company's employees shall avoid any kind of practices which may cause adverse impression regarding the other companies in the industry and their employees.

9. Communication Policy

The company's internal and external communication policy shall be arranged and conducted

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within the framework of ethical rules.

The Company, in its sponsorship activities, shall act with the consciousness of its social responsibilities. Environmental consciousness and social benefit are the basic elements of the Company's communication policies.

The Company, in its notices, announcements and advertisements; shall not use any expression and statement which defames the other companies in the industry or the products and services of the other companies.

10. Review

The Deputy Chief Executive, which the human resources function reports to, is responsible for the The Ethical Rules and Implementation Principles, and reviews The Ethical Rules and Implementation Principles at least once a year, in line with the changes in operating conditions, compliance and requirements. The necessary updates and changes are approved by the Board of Directors and subsequently enter into force.

11. Enforcement and Publication

This Policy and changes made to the Policy will enter into force on the date of approval. The Ethical Rules and Implementation Principles is published on the Company's corporate website.