

MİLLÎ REASÜRANS T.A.Ş.
CODE OF ETHICS AND CODES OF PRACTICE

CODE OF ETHICS

Code of Ethics of Millî Reasürans T.A.Ş. (Millî Reasürans) is a guide for the Company to act correctly, honestly, reliable, respectfully, impartially, transparently and with principles towards all kinds of people and institutions with which it has commercial, employment, legal, and managerial relations, such as its customers, shareholders and employees. This guide defines principles and practices that are in line with local legislation and Company policies, protect the reputation of the industry, adopt corporate principles and values, and are binding for all stakeholders in order to raise and maintain the Company's mission and vision.

It will be possible to further improve the performance and productivity of employees, as well as the results achieved at the individual and corporate level through the Code of Ethics of Millî Reasürans. Effective implementation of the Code of Ethics will not only increase service quality, but also result in efficient use of resources. The uncompromising implementation of the Code of Ethics will both increase the prestige of the industry and the Company, and it will also have positive economic results.

CODES OF PRACTICE

Compliance with the Country Legislation and Company Policies

Our Company is obliged to continue its activities in accordance with all the legislation in force in the Republic of Turkey, especially the general and special laws governing the insurance business, and the basic principles of international law. To that extent, it completely fulfills its obligations regarding Occupational Health and Safety by creating a healthy and safe working environment. In addition, it protects the intellectual and industrial rights of all individuals and institutions in accordance with the law. To that extent, the rules that all employees and managers are obliged to comply with have been established within the corporate structure of Millî Reasürans.

1. Gender Equality Policy

Millî Reasürans treats all its related parties equally, regardless of their religion, sect, language, race, ethnic origin, gender, sexual orientation or age. In this context, it respects different understandings, cultures, traditions and beliefs. The company supports the basic human rights and inclusive cultural diversity set forth within the framework of universal principles, respects the personality of the employee, protects and observes the material and moral rights.

The company adopts the principle of preventing gender discrimination; It provides a fair working environment where women can take charge in every position and develop their knowledge and skills as employees with equal opportunities and rights within the Company.

Millî Reasürans initiates the necessary legal process in the event that its employees are faced with an act or behavior that can be considered as an element of violence, such as abuse, pressure, threats, physical violence, and risking their safety and health.

2. Anti-Bribery and Anti-Corruption Policy

Millî Reasürans employees act within the framework of the Anti-Bribery and Anti-Corruption Policy; they make decisions in all their activities in a way that will protect the Company's interests at the highest level. They avoid any behavior that may result in benefiting themselves or their relatives by using the company's resources and reputation.

In that regard, training is given to all employees against bribery and corrupt acts, which may mean directly or indirectly benefiting the person for doing or not doing a job; inappropriate offers of the parties with whom business relations were made are immediately reported to the relevant authorities. Company employees cannot undertake any paid work outside the Company.

3. Gift and Hospitality Policy

Company employees act within the framework of Millî Reasürans's Gift and Hospitality Policy regarding gifts they accept within the scope of business relations or to give to third parties on behalf of the Company, and in representation and entertainment practices.

4. Social Responsibility Policy

Within the scope of Social Responsibility Policy of Millî Reasürans, the company takes a leading role in activities aimed at protecting human rights, the environment and public health. The company demonstrates its social responsibility understanding in the most effective way by contributing to the Turkish Insurance Industry and society, especially in the fields of education, culture, arts and sports, undertaking duties in these areas, realizing concrete projects and providing sponsorship.

5. Purchasing Regulation

Purchasing processes within Millî Reasürans are carried out in line with the terms of contracts with corporate firms that meet purchasing needs according to performance, quality and cost criteria, and in accordance with the principles set forth in the Company Purchasing Regulation.

6. Information Security Policy

Millî Reasürans records and reports all kinds of commercial and financial information regarding its activities in an accurate, consistent and complete manner. Information and documents required to be submitted to public institutions and organizations are shared in accordance with legal regulations.

All necessary technical and administrative measures are taken to avert and prevent any loss of the Company's existing competitive advantage and reputation through unauthorized use, access, transfer to other persons and institutions, recording, alteration, use of any confidential and private Company information belonging to the Company that has not been disclosed or made public, in a way that harms the Company.

Employees cannot share information and documents in a way that contradicts the privacy policy. Millî Reasürans employees are obliged to keep the information they obtain confidential at all times, even if their employment at the Company ends. In case of violation of these obligations, legal proceedings are initiated against the persons concerned.

7. Protection of Personal Data and Privacy Policy

Millî Reasürans processes any personal data it obtains from real persons, whether through its employees or through commercial relations, in accordance with its purpose and the limits and exceptions set forth in the relevant legislation, and establishes the destruction processes by taking the necessary technical and administrative measures to protect such data. The company carries out these activities within the framework of the Personal Data Protection and Privacy Policy.

8. Use of Social Media

Employees cannot share content that will create a negative image about Company services or practices on social media. No posts can be made by the employees from their personal social media accounts in any way that would create the impression of being made on behalf of the Company or that would be identified with the corporate identity of the Company.

Millî Reasürans shares posts on social media platforms in line with the Company's prestige and position in the industry through its corporate accounts.

9. Commodity Use

All employees take care to use the records, machinery, equipment, fixtures and tools of the Company in accordance with their intended use and in an efficient manner; necessary trainings are given to the employees so that they can make the best use of technological tools. Measures are taken to prevent resources from being misused, damaged, wasted, loaned, rented and sold, and employees cannot use the communication and transportation facilities provided to them by the Company for personal purposes.

10. Political Activities

Millî Reasürans does not support any political party or politician, and no donations can be made to political parties and candidates on behalf of the Company. Demonstrations, propaganda and similar activities are not allowed within the boundaries of the workplace on political issues. Company resources cannot be used for political purposes.

The company and its employees can become members of unions, foundations, associations, professional associations, chambers and similar non-governmental organizations, which will contribute to the society and the industry, established in accordance with the law and take part in their management. Said membership and duties can be performed individually and/or on behalf of the Company.