

#	Category	Principle Name and Code	Definition of Principle	Compliance Status	Explanation
1	General	A1. Strategy, Policy and Targets	The Board of Directors determines material and prioritized ESG issues, risks and opportunities and creates ESG policies accordingly. In terms of effective implementation of these policies, the internal directives, business procedures of companies, etc. may be prepared. The Board of Directors takes decisions for implementation of these policies and makes them public.	Partial Compliance	Our policies published in ESG field (Human Resources Policy, Wage Policy (for members of the Board of Directors), Ethical Principles Policy, Policy on Fight Against Bribery and Corruption), and our Climate Change Strategy Regulation are approved by our Board of Directors. Our works for formulation of additional policies and procedures are ongoing.
2			It determines the Company Strategy in line with the ESG policies, risks and opportunities. It determines the short and long-term goals in line with the Company Strategy and ESG policies and makes them public.	Partial Compliance	Some of the principles under the headings of Social Principles and Corporate Governance Principles included in the Sustainability Principles Compliance Framework are already covered by the existing Corporate Governance Principles of the Capital Markets Board, and our Company's compliance with these principles is presently disclosed in URF - Corporate Governance Compliance Report, and KYBF - Corporate Governance Information Form, and under the title of Explanations as per Article 8-(1) of the Corporate Governance Communiqué no. 1.17 included in our Activity Report, all of which are published through PDP Platform.
3		A2. Implementation / Monitoring	It appoints committees/units responsible for execution of ESG policies and makes them public. The responsible committee / unit reports the activities carried out within the scope of these policies to the Board of Directors at least once a year and in any case within maximum periods determined for public disclosure of annual activity reports in the relevant regulations of the Board.	Partial Compliance	The works required under the Sustainability Principles Compliance Framework have been carried out by Investors Relations Department during the year 2021, but in 2022, this duty will be performed by the Working Group appointed within and under our Company's Activity Report Committee. Full compliance with this issue is intended to be reached in 2022.
4			It creates and discloses to public the implementation and action plans in line with the short and long-term goals determined as above.	Non-compliance	In 2022, it is planned to determine goals and objectives through the Working Group formed and appointed within the related Committee.
5			It determines ESG Key Performance Indicators (KPIs) and declares them in a comparative manner on a yearly basis. In the case of availability of verifiable data, it presents its KPIs together with local and international sector comparisons.	Non-compliance	In 2022, it is planned to determine goals and objectives through the Working Group formed and appointed within the related Committee.
6		A3. Reporting	It declares its innovation activities for improvement of its sustainability performance in respect of business processes or products and services.	Non-compliance	In 2022, it is planned to determine goals and objectives through the Working Group formed and appointed within the related Committee.
7			It reports its sustainability performance, goals and actions at least once a year and makes them public. It further discloses information on its sustainability activities within its annual activity report.	Full Compliance	It is intended to publish the disclosures relating to compliance with the principles set down in Sustainability Principles Compliance Framework in the annual activity report, and if any material change occurs in the aforesaid disclosures during the relevant period, to disclose said changes in the interim activity periods.
8			It is essential to share in a direct and concise manner all information which is important for stakeholders in understanding the position, performance and development of the Company. It can also provide detailed information and data in its corporate website, and issue separate reports that directly meet the needs of different stakeholders.	Full Compliance	Communications with stakeholders are conducted through our Company's corporate website, financial reports, activity reports and PDP (Public Disclosure Platform) disclosures.
9			It shows maximum care in terms of transparency and reliability. It objectively discloses all kinds of developments about material issues in its public disclosures and reports as a requirement of a balanced approach thereto.	Full Compliance	Our Company shows maximum care for transparency and reliability and objectively discloses all kinds of developments about material issues.
10			It gives information about which of the United Nations (UN) 2030 Sustainable Development Goals its activities are related to.	Non-compliance	In 2022, a study aiming to find out about which of the United Nations 2030 Sustainable Development Goals its sustainability activities are related to is planned to be included in agenda of the Working Group appointed within the related Committee.
11			It makes disclosures about lawsuits commenced against it and/or lost by it in respect of environmental, social and corporate governance issues.	Full Compliance	There is no pending lawsuit in respect of environmental, social and corporate governance issues. If any legal dispute arises in connection therewith, our Company is ready to make the required public disclosures.
12		A4. Verification	If verified by independent third parties (independent sustainability assurance providers), its discloses its sustainability performance measurements to public and strives for further increasing the said verification procedures.	Non-compliance	Verification service is not being received in relation with sustainability. It is planned to take this issue in the agenda of Working Group appointed within the related Committee in the year 2022.
13	Environment	B. Environmental Principles	It discloses its policies and practices, action plans, environmental management systems (known by ISO 14001 standards) and programs in the field of environmental management.	Full Compliance	Ray Sigorta A.Ş. acts in full compliance with the laws and other regulations pertaining to environment to the extent they are related to its fields of activity and its business processes. To this end, with a view to assuring compliance with the environmental management practices, a waste management policy is created and being applied. In accordance with zero waste regulation, paper, plastic, metal, glass, battery and electrical-electronic wastes are segregated at their sources, and are delivered to the recycling firms.
14			It discloses and complies with environmental laws and other relevant regulations pertaining thereto.	Full Compliance	Ray Sigorta A.Ş. acts in full compliance with the laws and other regulations pertaining to environment to the extent they are related to its fields of activity and its business processes. To this end, it is conducting its insurance and underwriting policies in strict compliance with its "Climate Change Strategy Regulation" document approved also by the Company's Board of Directors. Through projects conducted jointly with WWF, actions are taken in order to raise awareness of employees on the use of natural resources.
15		It discloses both limitations of environmental report to be included in the overall report to be prepared under the Sustainability Principles, and restrictions on reporting period, reporting date, data collection process and reporting conditions relating thereto.	Irrelevant	In terms of its fields of business, our Company is not directly related to the standards on environmental issues.	
16		It names and discloses the highest senior executive and the related committees in the Company, together with duties thereof, in relation with the environment and climate change issues.	Irrelevant	In terms of its fields of business, our Company is not directly related to the standards on environmental issues.	
17		It discloses the incentives offered for management of environmental issues, also including the achievement of objectives.	Irrelevant	In terms of its fields of business, our Company is not directly related to the standards on environmental issues.	
18		It explains how environmental issues and problems are integrated into its business goals, objectives and standards.	Irrelevant	In terms of its fields of business, our Company is not directly related to the standards on environmental issues.	
19		It discloses its sustainability performances in respect of its business processes or products and services, as well as its actions and activities aimed at improvement of said performances.	Partial Compliance	In 2022, it is planned to determine goals and objectives through the Working Group formed and appointed within the related Committee.	
20		It discloses how it manages environmental issues, and integrates its supplies and customers into its strategies, along the Company's value chain, not just in terms of its direct operations.	Partial Compliance	In 2022, it is planned to determine goals and objectives through the Working Group formed and appointed within the related Committee.	
21		It discloses whether it is also involved in policy-making processes on environmental issues (sectoral, regional, national and international), as well as its cooperation with environment associations, related organisations and non-governmental organisations it is a member of, and the duties and positions it has assumed, and the activities it gives support, if any, in said organisations.	Partial Compliance	In 2022, it is planned to determine goals and objectives through the Working Group formed and appointed within the related Committee.	
22		It reports information on its environmental impacts in a periodically comparable manner in the light of environmental indicators (Greenhouse gas emissions (Scope-1 (Direct), Scope-2 (Energy indirect), Scope-3 (Other indirect)), air quality, energy management, water and wastewater management, waste management and biodiversity impacts)	Irrelevant	In terms of its fields of business, our Company is not directly related to the standards on environmental issues.	
23		It discloses the standards, protocols, methodologies and base year details used to collect and calculate its data.	Irrelevant	In terms of its fields of business, our Company is not directly related to the standards on environmental issues.	
24		It discloses the status of environmental indicators for the reporting year (increase or decrease) in comparison with past years.	Irrelevant	In terms of its fields of business, our Company is not directly related to the standards on environmental issues.	
25		It sets and discloses its short and long-term goals for reduction of its environmental impacts. These goals are recommended to be determined on the Basis of Science as suggested by the United Nations Conference of the Parties on Climate Change. If there is progress in the reporting year according to the targets determined at the beginning, it gives information thereabout.	Partial Compliance	Ray Sigorta A.Ş. acts in full compliance with the laws and other regulations pertaining to environment to the extent they are related to its fields of activity and its business processes. To this end, a Climate Change Strategy Policy is prepared, and then approved by our Company's Board of Directors.	

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26			It discloses its strategy and actions to combat the climate crisis.	Partial Compliance	Ray Sigorta A.Ş. acts in full compliance with the laws and other regulations pertaining to environment to the extent they are related to its fields of activity and its business processes. To this end, a Climate Change Strategy Policy is prepared, and then approved by our <u>Company's Board of Directors</u> .
27			It discloses both the program and procedures for prevention or minimization of potential negative impacts of the products and/or services offered by it, and the actions taken in order to reduce greenhouse gas emissions of third parties.	Irrelevant	In terms of its fields of business, our Company is not directly related to the standards on environmental issues.
28			It discloses its actions taken to reduce its environmental impacts, and total number of projects and initiatives carried out, as well as the environmental benefits / revenues and cost savings provided by them.	Irrelevant	In terms of its fields of business, our Company is not directly related to the standards on environmental issues.
29			It reports its total energy consumption date (excluding raw materials), and discloses its energy consumption is Scope-1 and Scope-2.	Irrelevant	In terms of its fields of business, our Company is not directly related to the standards on environmental issues.
30			It provides information on electricity, heat, steam and cooling generated and consumed during the reporting year.	Irrelevant	In terms of its fields of business, our Company is not directly related to the standards on environmental issues.
31			It conducts studies and works for increasing the use of renewable energy, and transition to zero or low carbon electricity, and makes these studies and works public.	Irrelevant	In terms of its fields of business, our Company is not directly related to the standards on environmental issues.
32			It discloses its renewable energy generation and consumption data.	Irrelevant	In terms of its fields of business, our Company is not directly related to the standards on environmental issues.
33			It prepares energy efficiency projects and discloses the level of reduction in its energy consumption and emission provided thanks to its said projects.	Irrelevant	In terms of its fields of business, our Company is not directly related to the standards on environmental issues.
34			It reports the amount of water withdrawn, used, recycled and discharged from underground or above ground, as well as its sources and procedures relating thereto (Total water withdrawal by sources, water resources affected by its water withdrawal, percentage and total volume of recycled and reused water, etc.).	Irrelevant	In terms of its fields of business, our Company is not directly related to the standards on environmental issues.
35			It discloses whether its operations or activities are included in any carbon pricing system or not (Emission Trading System, Cap & Trade or Carbon Tax).	Irrelevant	In terms of its fields of business, our Company is not directly related to the standards on environmental issues.
36			It discloses information on carbon credits accumulated or purchased during the reporting period.	Irrelevant	In terms of its fields of business, our Company is not directly related to the standards on environmental issues.
37			It discloses the details if carbon pricing is applied and used within the Company.	Irrelevant	In terms of its fields of business, our Company is not directly related to the standards on environmental issues.
38			It discloses all mandatory and voluntary platforms where it makes environmental data and information public.	Irrelevant	In terms of its fields of business, our Company is not directly related to the standards on environmental issues.
39			It forms a Human Rights and Employee Rights Policy with a commitment to fully comply with the Universal Declaration of Human Rights, ILO Conventions ratified by Turkey, and the applicable laws and regulations governing the operation of human rights and working life in Turkey. It discloses to public both this policy and the roles and responsibilities associated with its implementation.	Full Compliance	All of the Human Resources policies and practices of Ray Sigorta A.Ş. are performed in accordance with the current Labour Act and other applicable laws and regulations.
40			It provides equal opportunity in recruitment processes. By also considering the supply and value chain effects, it includes fair labor, improvement of labor standards, women's employment and inclusion issues (non-discrimination as women, men, religious belief, language, race, ethnic origin, age, disability, refugee, etc.) in its policies.	Full Compliance	Equality of opportunity is provided in recruitment processes. Our Companies KPIs also include goal/goals with regards to equality at work.
41			It discloses the measures taken along the value chain for protection of groups sensitive to certain economic, environmental and social factors (low-income groups, women, etc.) or minority rights / equality of opportunity.	Full Compliance	Our Company approaches to all employees with its basic principle of equality and takes actions for recognition of equal rights to everyone without making any discrimination of language, religion, race, gender, ethnic origin and nationality. Health, security and welfare of all employees are attached great importance without any discrimination of gender. Inclusion of women in workforce is particularly supported, and women are employed at a rate of 49% in workforce. The required plans are made for enabling the handicapped and the newly graduated young to make use of career opportunities on equality basis, and their rights are protected through equality of opportunity in employment.
42			It reports developments regarding discrimination, inequality, violations of human rights, forced labor and corrective practices pertaining thereto, and discloses its regulations for prevention of employment of child labour.	Full Compliance	Equality of opportunity is provided in recruitment processes. In all recruitment processes and all human resources applications (recruitment, equality of opportunity, non-employment of child labour, etc.), we are acting in strict compliance with the current Labour Act and other applicable laws and regulations.
43		C1. Human Rights and Employee Rights	It discloses its policies regarding investments made in employees (training, development policies), compensations, vested fringe benefits, right to unionize, work / life balance solutions and talent management, and determines dispute resolution processes by creating mechanisms for employee complaints and dispute resolution, and regularly discloses the activities carried out for the sake of employee satisfaction.	Full Compliance	As a result of 'trust index' analysis measuring the trust of employees to the Company, and 'workplace culture' analysis covering the human resources applications adopted by the Company, both performed in 2019 by Great Place to Work Institute, which conducts studies and researches for reinforcement of corporate culture and formation of best workplaces all over the world since more than 30 years, our Company is found eligible to be named as "Great Place To Work Certified" on 18.11.2019. In the "Best Employers of Turkey" Survey organised for the eighth time in 2019, our Company has been selected as one of the best employers, and in the survey which it participated for the first time, it has been named as the "Best Employer of Turkey" as of 21.04.2020. Through its Flexible Fringe Benefits Program Allray't, various different fringe benefits from private pension to health insurance, from shopping to travel are presented in the choice of our employees. Through its Employee Support Program Avita, 7/24 consulting and information services are provided by specialists to employees and their family members sharing the same home with them on various issues and subjects such as healthy nutrition, psychological counseling and guidance, technologic support, social life, and lumbago, neck and back pains which may create stress on individuals and may be needed to be researched and learned. Taking the periodical needs of employees into consideration, special gift boxes are sent to employees so as to raise their motivations in their busy work schedules. During the year 2021, net 500 TL has been paid to each employee for their needs increased during the home office working periods due to COVID-19 pandemic.
44	Social		It formulates and makes public its occupational health and safety policies. It discloses its precautions taken for protection against work accidents and protection of health, together with accident statistics.	Full Compliance	Occupational Health and Safety policies are formed and issued. Within our Company's organisation, an Occupational Health and Safety Committee is established, and this Committee regularly meets with participation of Occupational Health and Safety Advisor, Employer's Representative and in-house doctor of our Company, in order to review the practices. Measures taken for protection against work accidents and for protection of health, as well as accident statistics are recorded and documented.

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45	C2. Stakeholders, International Standards and Initiatives		It formulates and makes public its personal data protection and data security policies.	Full Compliance	Policies required to be issued pursuant to the Law no. 6698 and its regulations and bylaws have been issued and published.		
46			It formulates and makes public an ethics policy (work, work ethics, compliance processes, advertising and marketing ethics, open information, etc. activities included).	Full Compliance	An ethics policy is formulated. It is both shared with our customers, suppliers and employees, and published in our internet site.		
47			It discloses its activities for social investment, social responsibility, financial inclusion and access to finance.	Full Compliance	Our Company is sensitive on social responsibility issues, and takes actions to the highest degree in accordance with its conditions. Its donation activities will be continued to be managed within the frame of limit to be determined in its 2021 annual General Assembly meeting. Social responsibility projects and all activities pertaining thereto are published in our financial reports, Annual Activity Reports and our Company's website.		
48			It organizes information meetings and training programs for employees on ESG policies and practices.	Non-compliance	In 2022, it is planned to determine goals and objectives in respect of ESG policies and practices through the Working Group formed and appointed within the related Committee.		
49			It carries out its activities in the field of sustainability by taking into account the needs and priorities of all stakeholders (employees, customers, suppliers and service providers, public administrations, shareholders, society and non-governmental organisations, etc.).	Full Compliance	During performance of sustainability works and initiatives, the needs of all stakeholders are taken into consideration, and the required information is provided to them.		
50			It formulates and makes public a customer satisfaction policy regarding management and resolution of customer complaints.	Full Compliance	Our Company aims to assure perfect customer experience at each point it contacts with its customers. In 2019, our Company has restructured its Call Centre so as to make it more customer-focused, and has revised the organisation structure, processes and management of its Customer Satisfaction department. Under the title of 'User Experience', all of our contracted suppliers are periodically assessed from different perspectives such as access to Call Centre, communication skills, appointment getting and timing, and quality of services received therefrom, and the process is tested from end to end, and deficiencies are determined, and different solution proposals are presented. Comments received via social media channels are tracked in details on daily basis, and these comments are examined and discussed, and demands are quickly satisfied and met. Every month, for the sake of measurement of customer satisfaction, NPS scores are regularly tracked and followed, and assessments are made with various different business units and suppliers, and in tandem with the results thereof, special business plans and actions are put into force and implemented, and the process is continuously followed. In A.C.E. Awards (Achievement in Customer Excellence) organized by Şikayet Var.com every year for determining the brands achieving the highest customer satisfaction in Turkey, our Company has ranked among the top three in elementary insurance companies category for two years successively.		
51			It handles stakeholder communications continuously and transparently, and discloses with which stakeholders it communicates for what purposes, on what issues and how often, as well as the developments recorded in sustainability issues.	Full Compliance	Our Company handles its communications with its stakeholders continuously and transparently within the frame of its Corporate Governance Principles. In line with the development of its business activities, our Company will formulate and publish policies for communication with other stakeholders as well, within the frame of same principles.		
52			It publicly discloses the international reporting standards adopted by it (Carbon Disclosure Project (CDP), Global Reporting Initiative (GRI), International Integrated Reporting Council (IIRC), Sustainability Accounting Standards Board (SASB), Climate-Related Financial Disclosures Task Force (TCFD) etc.).	Irrelevant	It is irrelevant in terms of the current situation and coverage of our Company's activities.		
53			It discloses the international organisations or principles which it is a signatory or member of (Equator Principles, United Nations Environment Program Finance Initiative (UNEP-FI), United Nations Global Compact (UNGC), United Nations Principles for Responsible Investment (UNPRI) etc.), and international principles adopted by it (International Capital Market Association (ICMA) Green/Sustainable Bond Principles, etc.).	Irrelevant	It is irrelevant in terms of the current situation and coverage of our Company's activities.		
54			It makes concrete efforts for inclusion in Borsa Istanbul Sustainability Index and international sustainability indices (Dow Jones Sustainability Index, FTSE4Good, MSCI ESG Indices, etc.).	Irrelevant	It is irrelevant in terms of the current situation and coverage of our Company's activities.		
55			D. Corporate Governance Principles		It shows maximum efforts to comply with all mandatory Corporate Governance principles set forth in the Capital Markets Board Corporate Governance Communiqué no. II-17.1, as well as all principles pertaining to Corporate Governance.	Full Compliance	Our Company is showing maximum efforts for compliance with Corporate Governance Principles, as stated and reflected also in our activity report, URF- Corporate Governance Compliance Report, and KYBF- Corporate Governance Information Form.
56					It takes into account the sustainability issue, the environmental impacts of its activities and the principles in this regard in the course of determination of its corporate management strategy.	Full Compliance	In line with its corporate activities and developments, our Company shows maximum efforts for compliance with all policies and practices relating to ESG, particularly compliance with corporate governance principles.
57					As stated in the Corporate Governance Principles, it takes the necessary measures to comply with the principles regarding stakeholders and to strengthen the communication with stakeholders, and it consults to the stakeholders in determining the measures and strategies in the field of sustainability.	Full Compliance	Within the frame of reporting of compliance with the Corporate Governance Principles, information on relations with stakeholders is included in our activity report, URF- Corporate Governance Compliance Report, and KYBF- Corporate Governance Information Form.
58					It works on raising awareness on the issue of sustainability and its importance through social responsibility projects, awareness activities and trainings.	Full Compliance	Our both physical and online supports to our social aid and support projects to which individual participation is also encouraged are continued also in the year 2021. We continued to show the importance attached to the equality of opportunity in education with our support given to Darüşşafaka Society since long years. In 43rd Istanbul Marathon organized in 2021, with our Virtual Running team, we determined our own racing track ourselves, and were "First Company Among Top Fundraisers" in 15 km category, thereby once more showing the support given to education. Our running team was the "Top Fundraising Company" in Darüşşafaka's 'If it is for Education, we Run for Help' campaign, and was "Second Company Among Top Fundraisers" in all donation campaigns organized all over Turkey. Thanks to this success in our campaign, we were able to touch education lives of more than 80 students. In the year 2019, we have been the 1st among fundraisers, and have been the 3rd among fundraisers in all campaigns raising funds for all non-governmental organisations. Thanks to this support, we have assured the continuity of education life of 147 students.
59	It strives for becoming a member of and for making contributions to efforts for international standards and initiatives in the field of sustainability.	Irrelevant			It is irrelevant in terms of the current situation of our Company's activities.		
60	It discloses its policies and programs focused on the fight against bribery and corruption and on the principle of tax integrity.	Full Compliance			Our Company has adopted ethical principles and established an Ethics Committee in order to protect rights of its stakeholders. If and when needed, Early Detection of Risk Committee, Audit Committee and/or Corporate Governance Committee are also kept informed thereabout. Furthermore, our Policy on Fight Against Bribery and Corruption is also published in our corporate internet site.		