



KAMUYU AYDINLATMA PLATFORMU

RAY SİGORTA A.Ş. Sustainability Compliance Report 2025 - Annual Notification

Summary

Sustainability Principles Compliance Report 2025



**MERKEZİ KAYIT
İSTANBUL**

Türkiye Sermaye Piyasası - Merkezi
Saklanması ve Veri Depolama Kuruluşu

Related Companies

Related Funds

	Company Compliance Status				Explanation	Report Information on Publicly Disclosed Information (Page number, menu name on the website)
	Yes	Partial	No	Not Applicable		
Sustainability Compliance Report						
A. GENERAL PRINCIPLES						
A1. Strategy, Policy and Goals						
A1.1. The prioritised environmental, social and corporate governance (ESG) issues, risks and opportunities have been determined by the Company's Board of Directors.	X				Some of the principles under the Social Principles and Corporate Governance Principles included within the Sustainability Principles Compliance Framework are also included in the current Corporate Governance Principles of the Capital Markets Board. The compliance status of our Company with these principles is currently explained in the URF - Corporate Governance Compliance Report and KYBF - Corporate Governance Information Form published on the Public Disclosure Platform (KAP), as well as under the section 1.17. Explanations within the Scope of Article 8-(1) of the Corporate Governance Communiqué in our Annual Report . Environmental risks and opportunities were disclosed in the 2024 TSRS report and will be disclosed in the 2025 TSRS report.	Annual Report / Sustainability report
A1.1. The ESG policies (Environmental Policy, Energy Policy, Human Rights and Employee Policy etc.) have been created and disclosed to the public by the Company's Board of Directors.	X				Our policies published in the ESG field (Information Policy , Human Resources Policy, Wage Policy (for members of the Board of Directors), Ethical Principles Policy, Policy on Fight Against Bribery and Corruption) are approved by	Investor Relations Ray Sigorta

			our Board of Directors. Additional policies and procedures shall be developed as needed.	
A1.2. The short and long-term targets set within the scope of ESG policies have been disclosed to the public.	X		Some of the principles listed under the Social Principles and Corporate Governance Principles, which are included within the Framework for Compliance with Sustainability Principles, are also included in the current Corporate Governance Principles of the Capital Markets Board, and our Company's compliance with these principles is currently explained in the URF - Corporate Governance Compliance Report, the KYBF - Corporate Governance Information Form published on the Public Disclosure Platform, and under the heading 1.17. Disclosures Within the Scope of Article 8- (1) of the Corporate Governance Communiqué in our Annual Report . In the 2024 TSRS report, the short- and long-term targets determined within the scope of environmental potential have been disclosed to the public. They will be disclosed in the 2025 TSRS report.	Annual Report / Sustainability report
A2. Implementation/Monitoring				
A2.1. The responsible committees and/or business units for the implementation of ESG policies and the senior officials related to ESG issues in the Company and their duties have been identified and disclosed to the public.	X		It is planned that the works required under the Sustainability Principles Compliance Framework are monitored by the Investor Relations Department to ensure they are performed in accordance with the activities of our Company and such works are reported to senior management.	Annual Report / Sustainability report
A2.1. The activities carried out within the scope of policies by the responsible committee and/or unit have been reported to the Board of Directors at least once a year.	X		It is planned that these are monitored by the Investor Relations Department and are submitted to	Annual Report / Sustainability report

				senior management.	
A2.2. In line with the ESG targets, the implementation and action plans have been formed and disclosed to the public.	X			Sustainability Reports have been published by the main shareholder of our company since 2016. Based on the experience we have gained from our main shareholder, swift action is taken regarding compliance, and maximum effort is made to ensure its continuation. In the 2024 TSRS report, implementation and action plans in line with environmental goals are explained. They will be disclosed in the 2025 TSRS report.	Annual Report / Sustainability report
A2.3. The Key ESG Performance Indicators (KPI) and the level of reaching these indicators have been disclosed to the public on yearly basis.	X			Environmental key performance indicators have been determined and will be disclosed in the 2025 TSRS Report. Achievement of the indicators by year will be disclosed starting from the 2026 TSRS Report.	
A2.4. The activities for improving the sustainability performance of the business processes or products and services have been disclosed to the public.	X			Company departments carry out improvement activities regarding the sustainability of business processes and services, and plan solutions in line with current conditions. The activities undertaken have been publicly disclosed through the Annual Report .	Annual Report / Sustainability report
A3. Reporting					
A3.1. The information about the sustainability performance, targets and actions have been given in annual reports of the Company an understandable, accurate and sufficient manner.	X			Explanations on compliance with the principles set out in the Sustainability Principles Compliance Framework are included in the annual report.	Annual Report / Sustainability report
A3.2. The information about activities which are related to the United Nations (UN) 2030 Sustainable Development Goals have been disclosed to the public.	X			Works on information about which of the United Nations 2030 Sustainable Development Goals are related to the sustainability activities are ongoing.	Annual Report / Sustainability report
A3.3. The lawsuits filed and/or concluded against the Company about ESG issues which are material in terms			X	There is no lawsuit commenced against the	

of ESG policies and/or will significantly affect the Company's activities, have been disclosed to the public.				Company regarding the ESG issues.	
A4. Verification					
A4.1. The Company's Key ESG Performance metrics have been verified by an independent third party and publicly disclosed.	X			Key environmental performance metrics in the 2024 TSRS-compliant sustainability report were verified by an independent third party and made public. They will be disclosed in the 2025 TSRS-compliant sustainability report.	Annual Report / Sustainability report
B. ENVIRONMENTAL PRINCIPLES					
B1. The policies and practices, action plans, environmental management systems (known by the ISO 14001 standard) and programs have been disclosed.	X			Ray Sigorta A.Ş. operates its business processes in full compliance with environmental laws and other regulations, to the extent that its activities impact the environment. Within this scope, a waste management policy has been established and is implemented to ensure adherence to environmental management practices. Paper, plastic, metal, glass, battery, and electronic waste are separated at the source in accordance with the Zero Waste Regulation and delivered to recycling companies. A Green Energy Certificate has been obtained for Ray Sigorta's Head Office. Additionally, the Head Office has also received the Green Office diploma.	Annual Report / Sustainability report
B2. The environmental reports prepared to provide information on environmental management have been disclosed to the public which is including the scope,	X			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	Annual Report / Sustainability report

<p>reporting period, reporting date and limitations about the reporting conditions.</p>			<p>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. Information regarding environmental management has been disclosed to the public in the 2024 TSRS report. It will be disclosed in the 2025 TSRS report.</p>	
<p>B4. The environmental targets within the scope of performance incentive systems which included in the rewarding criteria have been disclosed to the public on the basis of stakeholders (such as members of the Board of Directors, managers and employees).</p>	X		<p>Our environmental activities are implemented by remaining loyal to the principle of efficiency and in parallel with all our goals and objectives; process planning is carried out in a manner that ensures minimum impact to the environment.</p>	Annual Report / Sustainability report
<p>B5. How the prioritised environmental issues have been integrated into business objectives and strategies has been disclosed.</p>	X		<p>Our environmental initiatives are implemented in line with the principle of efficiency and in parallel with all our objectives, with process planning designed to minimize environmental impact. These activities have been publicly disclosed through the Annual Report . More detailed explanations will be provided in the 2025 TSRS Report.</p>	Annual Report / Sustainability report
<p>B7. The way of how environmental issues has been managed and integrated into business objectives and strategies throughout the Company's value chain, including the operational process, suppliers and customers has been disclosed.</p>	X		<p>Our environmental initiatives are implemented in line with the principle of efficiency and in parallel with all our objectives, with process planning designed to minimize environmental impact. These activities have been publicly disclosed through the Annual Report . More detailed explanations will be provided in the 2025 TSRS Report.</p>	Annual Report / Sustainability report
			<p>Our environmental initiatives are implemented in line with the principle of efficiency and in parallel with all</p>	

<p>B8. Whether the Company have been involved to environmental related organizations and non-governmental organizations' policy making processes and collaborations with these organizations has been disclosed.</p>	X			<p>our objectives, with process planning designed to minimize environmental impact. These activities have been publicly disclosed through the Annual Report . More detailed explanations will be provided in the 2025 TSRS Report.</p> <p>Annual Report / Sustainability report</p>
<p>B9. 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, biodiversity impacts)), information on environmental impacts is periodically disclosed to the public in a comparable manner.</p>	X			<p>Environmental indicators (Scope 1 and Scope 2) are explained in the 2024 TSRS Report. Comparative data will be shared starting from the 2025 report.</p> <p>Annual Report / Sustainability report</p>
<p>B10. Details of the standard, protocol, methodology, and baseline year used to collect and calculate data has been disclosed.</p>	X			<p>The details of the standards, protocols, methodologies, and base year used to collect and calculate data were disclosed to the public in the 2024 TSRS-compliant sustainability report. They will be disclosed in the 2025 TSRS-compliant sustainability report as well.</p> <p>Annual Report / Sustainability report</p>
<p>B11. The increase or decrease in Company's environmental indicators as of the reporting year has been comparatively disclosed with previous years.</p>		X		<p>Comparative data will be shared starting from the 2025 TSRS-compliant sustainability report.</p>
<p>B12. The short and long-term targets for reducing the environmental impacts have been determined and the progress compared to previous years' targets has been disclosed.</p>	X			<p>Ray Sigorta Inc. operates according to the principle of full compliance with environmental laws and other regulations to the extent that its business activities impact the environment. Information regarding short- and long-term goals will be shared comparatively starting from the 2025 TSRS-compliant sustainability report.</p> <p>Annual Report / Sustainability report</p>
				<p>Ray Sigorta A.Ş. operates in full compliance with environmental laws and other regulations to the extent that its business activities impact the environment. In this context, a Climate Change Strategy Policy has been prepared and approved by the Company's Board</p>

B13. A strategy to combat the climate crisis has been created and the planned actions have been publicly disclosed.	X			of Directors. 'Climate Action' has been identified as a material ESG topic, and activities related to this topic are disclosed in the annual report. More detailed information was disclosed in the 2024 TSRS-compliant sustainability report and will be disclosed in the 2025 TSRS-compliant sustainability report.	Annual Report / Sustainability report
B14. The programs/procedures to prevent or minimize the potential negative impact of products and/or services on the environment have been established and disclosed.	X			The Green Office program is being implemented. Additionally, emission-reducing actions have been identified as part of the sustainability plan. Details are explained in the 2024 TSRS-compliant sustainability report and will be disclosed in the 2025 TSRS-compliant sustainability report.	TSRS 2024 Sustainability report
B14. The actions to reduce greenhouse gas emissions of third parties (suppliers, subcontractors, dealers, etc.) have been carried out and disclosed.		X		Actions have been planned to reduce greenhouse gas emissions by third parties.	TSRS 2024 Sustainability report
B15. The environmental benefits/gains and cost savings of initiatives/projects that aims reducing environmental impacts have been disclosed.	X			It was published in the 2024 TSRS-compliant sustainability report. It will be published in the 2025 TSRS report.	TSRS 2024 Sustainability report
B16. The data related to energy consumption (natural gas, diesel, gasoline, LPG, coal, electricity, heating, cooling, etc.) has been disclosed as Scope-1 and Scope-2.	X			It was published in the 2024 TSRS-compliant sustainability report. It will be published in the 2025 TSRS report.	TSRS 2024 Sustainability report
B17. The information related to production of electricity, heat, steam and cooling as of the reporting year has been disclosed.	X			It was published in the 2024 TSRS-compliant sustainability report. It will be published in the 2025 TSRS report.	TSRS 2024 Sustainability report
B18. The studies related to increase the use of renewable energy and transition to zero/low carbon electricity have been conducted and disclosed.	X			The Head Office of Ray Sigorta A.Ş. meets its energy needs from renewable energy sources through the I-REC certificate it has obtained. These initiatives are detailed in the Sustainability section of the Annual Report.	Annual Report / Sustainability report
				The Head Office of Ray Sigorta A.Ş. meets its energy needs from renewable energy sources through	

B19. The renewable energy production and usage data has been publicly disclosed.	X			the I-REC certificate it has obtained. These initiatives are detailed in the Sustainability section of the Annual Report.	Annual Report / Sustainability report
B20. The Company conducted projects about energy efficiency and the amount of reduction on energy consumption and emission achieved through these projects have been disclosed.	X			The Head Office of Ray Sigorta A.Ş. meets its energy needs from renewable energy sources through the I-REC certificate it has obtained. In addition, energy efficiency projects are carried out under the Green Office program. These initiatives are described in detail in the Sustainability section of the Annual Report.	Annual Report / Sustainability report
B21. The water consumption, the amount, procedures and sources of recycled and discharged water from underground or above ground (if any), have been disclosed.	X			It was published in the 2024 TSRS-compliant sustainability report. It will be published in the 2025 TSRS report.	TSRS 2024 Sustainability report
B22. The information related to whether Company's operations or activities are included in any carbon pricing system (Emissions Trading System, Cap & Trade or Carbon Tax).			X	In terms of its fields of business, our Company is not directly related to the standards on environmental issues.	
B23. The information related to accumulated or purchased carbon credits within the reporting period has been disclosed.			X	In terms of its fields of business, our Company is not directly related to the standards on environmental issues.	
B24. If carbon pricing is applied within the Company, the details have been disclosed.			X	In terms of its fields of business, our Company is not directly related to the standards on environmental issues.	
B25. The platforms where the Company discloses its environmental information have been disclosed.	X			It was published in the 2024 TSRS-compliant sustainability report. It will be published in the 2025 TSRS report.	TSRS 2024 Sustainability report
C. SOCIAL PRINCIPLES					
C1. Human Rights and Employee Rights					
C1.1. The Institutional Human Rights and Employee Rights Policy has been established in the ligh of the Universal Declaration of Human Rights, ILO Conventions ratified by Turkey and other relevant legislation. The policy and the officials that responsible for the implementation of it have been determined and disclosed.	X			The Company acts in full compliance with the Labor Act . It has procedures and practices in accordance with the Labor Act.	Annual Report / Talent & Culture
C1.2. Considering the effects of supply and value chain, fair workforce, improvement of labor standards, women's employment and inclusion issues (gender, race , religion, language, marital status, ethnic identity, sexual orientation, gender identity, family responsibilities, union activities, political opinion, disability, social and cultural differences, etc., such as non-discrimination) are included in its policy on employee rights.	X			Equality of opportunity is provided in recruitment processes. Our Companies KPIs also include goal/ goals with regards to equality at work.	Annual Report / Talent & Culture

<p>C1.3. The measures taken for the minority rights/equality of opportunity or the ones who are sensitive about certain economic, environmental, social factors (low income groups, women, etc.) along the supply chain have been disclosed.</p>	<p>X</p>		<p>Diversity and equality of opportunity is achieved by placing an emphasis on the employment of women and youth and observing their rights.</p>	<p>Annual Report / Talent & Culture</p>
<p>C1.4. The developments regarding preventive and corrective practices against discrimination, inequality, human rights violations, forced and child labor have been disclosed.</p>	<p>X</p>		<p>Equality of opportunity is provided in recruitment processes. Our Companies KPIs also include goal/goals with regards to equality at work.</p>	<p>Annual Report / Talent & Culture</p>
<p>C1.5. Investments in employees (education, development policies), compensation, fringe benefits, right to unionize, work/life balance solutions and talent management are included in the employee rights policy.</p>	<p>X</p>		<p>We were awarded the Great Place to Work Certification as a result of the strong corporate culture and employee satisfaction assessments conducted by the Great Place To Work Enstitüsü in 2019 and 2024. In addition to our Great Place to Work certification, we were honored with the title of “Best Employer in Turkey 2025.” Furthermore, in 2025, we were also included on the Best Employers list in the Social Responsibility & Volunteering and Young Millennials categories.</p>	<p>Annual Report / Talent & Culture</p>
<p>C1.5. The mechanism for employee complaints and resolution of disputes have been established and related solution processes have been determined.</p>	<p>X</p>		<p>We have a Reporting Line that is accessible to all our employees and allows them to submit feedback through five different channels . The resolution processes are carried out in accordance with the procedures specified in the relevant policy.</p>	<p>Annual Report / Talent & Culture</p>
			<p>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 Wellbees, 7/24 consulting and information services are provided by specialists to employees and</p>	

<p>C1.5. The activities carried out within the reporting period which related to ensure employee satisfaction have been disclosed.</p>	X			<p>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.</p>	Annual Report / Strategy and Talent & Culture
<p>C1.6. The occupational health and safety policies have been established and disclosed.</p>	X			<p>Occupational Health and Safety policies have been established. An Occupational Health and Safety Committee has been formed within our company. The Committee meets regularly with the participation of the Occupational Health and Safety Consultant, the Employer Representative, and the Company Doctor, and reviews the relevant practices. Measures taken to prevent occupational accidents and protect employee health, as well as accident statistics , are systematically recorded.</p>	Annual Report / Talent & Culture
<p>C1.6. The measures taken for protecting health, preventing occupational accidents and related statistics have been disclosed.</p>			X	<p>Occupational Health and Safety policies are formed and issued. The measures taken to prevent work accidents and to protect health are recorded along with accident statistics.</p>	Annual Report / Talent & Culture
<p>C1.7. The personal data protection and data security policies have been established and disclosed.</p>	X			<p>Personal data protection and data security policies have been established and published.</p>	Legal Information Ray Sigorta
<p>C1.8. The ethics policy have been established and disclosed.</p>	X			<p>An ethics policy is formulated. It is both shared with our customers, suppliers and employees, and published in our internet site.</p>	Legal Information Ray Sigorta

C1.9. The studies related to social investment, social responsibility, financial inclusivity and access to finance have been explained.	X			The sustainability section of the Activity Report provides detailed coverage of these efforts.	Annual Report / Sustainability report
C1.10. The informative meetings and training programs related to ESG policies and practices have been organized for employees.			X	It is planned to hold briefing sessions and training programs for employees regarding ESG policies and practices.	It is planned that informative meetings and training programs are organized to inform employees about the ESG policies and practices.
C2. Stakeholders, International Standards and Initiatives					
C2.1. The customer satisfaction policy regarding the management and resolution of customer complaints has been prepared and disclosed.	X			Our company attaches great importance to this matter. Between 2019 and 2025, we ranked among the top three in the non-life insurance category in the Customer Experience Index research conducted consecutively by Şikayetvar.com, and were awarded the Excellence in Customer Satisfaction Achievement Award. We also received the Excellence in Customer Satisfaction Achievement Award (Silver) at the A.C.E. Awards.	Annual Report / Marketing and Customer Solutions
C2.2. The information about the communication with stakeholders (which stakeholder, subject and frequency) have been disclosed.	X			Within the framework of Corporate Governance Principles, communication with shareholders is conducted continuously and transparently. Information about the communication carried out with stakeholders has been disclosed to the public in the 2024 sustainability report.	TSRS 2024 Sustainability report
C2.3. The international reporting standards that adopted in reporting have been explained.			X	The international reporting standards adopted in the 2024 TSRS Report and the 2024 Sustainability Report have been explained. An explanation will also be provided in the 2025 TSRS report.	TSRS 2024 Sustainability report
C2.4. The principles adopted regarding sustainability, the signatory or member international organizations, committees and principles have been disclosed.	X			These initiatives are described in detail in the Sustainability section of the Annual Report.	Annual Report / Sustainability report
C2.5. The improvements have been made and studies have been carried out in order to be included in the Borsa Istanbul sustainability indices and/or international index providers.			X	No work has been initiated on this matter.	

D. CORPORATE GOVERNANCE PRINCIPLES

<p>D1. The opinions of stakeholders have been sought in the determination of measures and strategies related to sustainability field.</p>	<p>X</p>		<p>Within the scope of reporting compliance with Corporate Governance Principles, information about relationships with stakeholders is included in the annual report, URF - Corporate Governance Compliance Report, and KYBF - Corporate Governance Information Form.</p>	<p>Annual Report / Sustainability report</p>
<p>D2. The social responsibility projects, awareness activities and trainings have been carried out to raise awareness about sustainability and its importance.</p>	<p>X</p>		<p>These initiatives are described in detail in the Sustainability section of the Annual Report.</p>	<p>Annual Report / Sustainability report</p>