INTERIM CONSOLIDATED FINANCIAL INFORMATIONS AS OF SEPTEMBER 30, 2021 AND INDEPENDENT AUDITOR'S REVIEW REPORT



REPORT ON REVIEW OF INTERIM CONSOLIDATED FINANCIAL INFORMATION

To the General Assembly of AgeSA Hayat ve Emeklilik A.Ş.

Introduction

1. We have reviewed the accompanying consolidated balance sheet of AgeSA Hayat ve Emeklilik A.Ş. (The "Company") and its subsidiary ("collectively referred as the "Group") as at 30 September 2021 and the related consolidated statements of income, consolidated other comprehensive income, consolidated changes in equity and consolidated cash flows for the nine-month period then ended, and a summary of significant accounting policies and other explanatory notes. The management of the Group is responsible for the preparation and fair presentation of these interim consolidated financial information in accordance with International Accounting Standard 34 "Interim Financial Reporting". Our responsibility is to express a conclusion on these interim consolidated financial information based on our review.

Scope of review

2. We conducted our review in accordance with International Standard on Review Engagements 2410, "Review of interim financial information performed by the independent auditor of the entity". A review of interim consolidated financial information consists of making inquiries, primarily of persons responsible for financial and accounting matters, and applying analytical and other review procedures. A review is substantially less in scope than an audit conducted in accordance with International Standards on Auditing and the objective of which is to express an opinion on the consolidated financial statements. Consequently, a review on the interim consolidated financial information does not provide assurance that the audit firm will be aware of all significant matters which would have been identified in an audit. Accordingly, we do not express an audit opinion.



Conclusion

3. Based on our review, nothing has come to our attention that causes us to believe that the accompanying interim consolidated financial information does not present fairly, in all material respects, the financial position of the Group as at 30 September 2021, and its financial performance and its cash flows for the nine- month period then ended in accordance with International Accounting Standard 34 "Interim Financial Reporting".

PwC Bağımsız Denetim ve Serbest Muhasebeci Mali Müşavirlik A.Ş.

Adnan Akan, SMMM Partner

Istanbul, 27 October 2021



AgeSA Hayat ve Emeklilik A.Ş. Saray Mah. Dr. Adnan Büyükdeniz Cad.

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AGESA HAYAT VE EMEKLİLİK ANONİM ŞİRKETİ

THE CONSOLIDATED FINANCIAL REPORT FOR THE PERIOD ENDED 30 SEPTEMBER 2021

We assure you that our consolidated financial report and the related disclosures and notes prepared in accordance are in compliance with International Financial Reporting Standards are permitted to be published.

İstanbul, 27 October 2021

of Firat Kuruca

Member of the Board of

Directors, General Manager

Zeliha Ersen Altınok Assistant General Manager

Finance

Gürel Çağlar Türkmen Group Manager

Accounting&Finance

Actuary

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

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CONSOLIDATED INFORMATION OF BALANCE SHEET FOR THE PERIOD ENDED SEPTEMBER 30, 2021 AND DECEMBER 31, 2020

Assets	Note	September 30, 2021	December 31,2020
Assets	11010	September 50, 2021	December 51,2020
Cash and cash equivalents	4,5	1,089,236,757	994,041,049
Financial assets	4.6	3,178,392,029	2,229,963,493
Premium and other insurance receivables	4,8	36,117,695	35,330,094
Reinsurance share of insurance liabilities	4,7,21	24,657,540	10,949,619
Deferred expenses	19	591,019,947	524,525,316
Other financial assets	4,13	897,700	868,012
Pension business receivables	4,9	211,888,212	197,580,785
Right of use assets	11	16,782,445	26,194,006
Property and equipment, net	11	47,637,105	26,571,545
Intangible assets, net	12	138,919,868	93,797,549
Other assets	10	27,803,735	40,668,444
Total assets		5,363,353,033	4,180,489,912
2 OWN WISSONS		3,200,200,000	1,100,105,512
Liabilities			
Lease liabilities	4,14	18,036,496	30,342,375
Due to insurance and reinsurance companies	4,14	64,004,752	32,213,493
Pension business payables	4,13	529,052,438	520,044,530
Insurance contract liabilities	21	3,160,030,209	2,211,385,128
Provision for employment termination benefits	17.18	26,766,824	21,040,315
Deferred tax liabilities	17,10	90,281,959	94,352,699
Current tax liabilities	17	38,264,965	13,368,352
Other payables and liabilities	4,20	121,629,610	128,998,804
Other provisions	16	53,844,147	52,836,084
		, - ,	, , , , , , , , , , , , , , , , , , , ,
Total liabilities		4,101,911,400	3,104,581,780
Share capital	1.1,22	180,000,000	180,000,000
Items that may be reclassified to profit or loss	111,22	100,000,000	100,000,000
Fair value reserves from available for sale assets	22	(8,478,587)	36,602,809
Other capital reserves	22	837.095	837,095
Profit reserves	22	325,319,340	190,370,612
Retained earnings		369,370,448	318,459,643
Profit for the period	23	394,393,337	349,637,973
Equity attributable to the owners of the Group		1,261,441,633	1,075,908,132
and a surrounded to the owners of the Oroup		1,201,111,000	1,0,0,00,102
Total equity and liabilities		5,363,353,033	4,180,489,912

CONSOLIDATED INFORMATION OF INCOME FOR THE PERIOD ENDED SEPTEMBER 30, 2021 AND SEPTEMBER 30, 2020

	Note	January 1 - September 30, 2021	July 1 - September 30, 2021	January 1 - September 30, 2020	July 1 - September 30, 2020
Income:					
Gross written premiums	3,21,24	1,398,290,164	537,699,902	983,259,324	326,085,585
Premium ceded to reinsurers	3,21,24	(20,287,775)	(8,063,598)	(13,525,301)	(3,764,494)
Premium written net of reinsurance	3,21,24	1,378,002,389	529,636,304	969,734,023	322,321,091
Net change in provision for unearned premiums reserves	3	(10,418,296)	(3,159,194)	19,523,782	12,864,016
Net premiums earned		1,367,584,093	526,477,110	989,257,805	335,185,107
Net change in mathematical reserves	3	(494,582,007)	(191,790,376)	(353,102,184)	(88,261,435)
Income generated from pension business	3,25	374,559,856	126,406,443	330,770,395	114,224,966
Investment and other income	28	209,143,285	84,452,074	91,571,909	27,578,402
Commission income	3,27	7,318,014	1,967,754	7,390,428	1,845,989
Foreign exchange gains/(losses), net	26	41,445,048	2,349,077	30,839,914	24,806,964
Other (expense)/income, net	31	1,593,400	689,551	-	
Total income		1,507,061,689	550,551,633	1,096,728,267	415,379,993
Expenses:					
Claims paid and change in outstanding claims provisions	3,21	(159,593,489)	(53,992,737)	(160,311,506)	(48,335,897)
General and administrative expenses	30	(424,021,751)	(152,839,423)	(308,647,665)	(101,269,656)
Pension expenses including commission	3,29	(137,236,563)	(48,048,151)	(122,595,957)	(39,024,928)
Commission expense	3,27	(257,219,760)	(111,961,148)	(157,940,573)	(51,569,691)
Other (expense)/income, net	31	<u> </u>	<u> </u>	(6,823,639)	(4,094,607)
Total expenses		(978,071,563)	(366,841,459)	(756,319,340)	(244,294,779)
Profit before taxes		528,990,126	183,710,174	340,408,927	171,085,214
Income tax expense (-)	3,17	(134,596,789)	(47,057,169)	(76,356,058)	(38,040,531)
Profit for the period	3,23	394,393,337	136,653,005	264,052,869	133,044,683
Earnings per share (TL 0.01 nominal value per share)	23	0.0219	0.0076	0.0147	0.0074

CONSOLIDATED INFORMATION OF COMPREHENSIVE INCOME FOR THE PERIOD ENDED SEPTEMBER 30, 2021 AND SEPTEMBER 30, 2020

	Note	January 1 - September 30, 2021		January 1 - September 30, 2020	July 1 - September 30, 2020
Profit for the year	3,23	394,393,337	136,653,005	264,052,869	133,044,683
Other comprehensive income:					
Items that may be reclassified subsequently to profit or (loss):					
Net gain/(loss) on available for-sale assets Deferred tax relating to components of		(57,274,748)	(20,949,727)	(47,862,595)	(36,467,768)
other comprehensive income		12,193,352	5,237,432	10,529,771	8,022,909
Net other comprehensive income/(loss) that may be reclassified to profit or loss in subsequent years		(45,081,396)	(15,712,295)	(37,332,824)	(28,444,859)
Items that will not be reclassified subsequently to profit or loss:					
Actuarial gain/ (loss) on employee termination benefits Deferred tax relating to actuarial gain/ (loss)		(4,723,050) 944,610	(3,118,655) 625,880	(2,484,005) 546,480	(451,884) 99,414
Net other comprehensive gain/ (loss) not being		(2.770.440)	(2.402.555)	(1.005.505)	(252.450)
reclassified to profit or loss in subsequent years		(3,778,440)	(2,492,775)	(1,937,525)	(352,470)
Other comprehensive income / (loss), net of tax		(48,859,836)	(18,205,070)	(39,270,349)	(28,797,329)
Total comprehensive income, net of tax		345,533,501	118,447,935	224,782,520	104,247,354

CONSOLIDATED INFORMATION OF CHANGES IN EQUITY FOR THE PERIOD ENDED SEPTEMBER 30, 2021 AND SEPTEMBER 30, 2020 (Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

	Note	Share capital	Other capital reserves	Items that may be reclassified to profit or loss/ Fair value reserves for available for - sale financial assets	Profit reserves	Retained earnings	Profit for the period	Total
Balances at January 1, 2020- as previously stated		180,000,000	837,095	(294,093)	135,728,079	247,919,092	240,536,950	804,727,123
ROP DAC impact		-		<u>-</u>	-	30,212,482	16,994,999	47,207,481
Balances at December 31, 2019		180,000,000	837,095	(294,093)	135,728,079	278,131,574	257,531,949	851,934,604
Profit for the period Other comprehensive loss	22			(37,332,824)		(1,937,525)	264,052,869	264,052,869 (39,270,349)
Total comprehensive income				(37,332,824)		(1,937,525)	264,052,869	224,782,520
Transfer Dividend payment					49,137,253	208,394,696 (160,000,000)	(257,531,949)	(160,000,000)
Balance at September 30, 2020		180,000,000	837,095	(37,626,917)	184,865,332	324,588,745	264,052,869	916,717,124
	Note	Share capital	Other capital reserves	Items that may be reclassified to profit or loss/ Fair value reserves for available for - sale financial assets	Profit reserves	Retained earnings	Profit for the period	Total
Balances at December 31, 2020		180,000,000	837,095	36,602,809	190,370,612	318,459,643	349,637,973	1,075,908,132
Profit for the period Other comprehensive income	22			(45,081,396)		(3,778,440)	394,393,337	394,393,337 (48,859,836)
Total comprehensive income				(45,081,396)		(3,778,440)	394,393,337	345,533,501
Transfer Dividend payment	22				134,948,728	214,689,245 (160,000,000)	(349,637,973)	(160,000,000)
Balance at September 30, 2021		180,000,000	837.095	(8,478,587)	325,319,340	369,370,448	394,393,337	1,261,441,633

CONSOLIDATED INFORMATION OF CASH FLOWS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

	Note	January 1 - September 30, 2021	January 1 - September 30, 2020
Cash flows from operating activities:			
Profit for the period	3,23	394,393,337	264,052,869
Income taxes	3,17	134,596,789	76,356,058
Depreciation and amortization	11,12,30	43,290,068	28,639,594
(Gains) / losses from sale of property and equipment	,,	-	,,
Interest income		(200,851,116)	(87,760,919)
Unrealized exchange rates (gains) / losses from cash and cash equivalents		32,428,913	17,323,178
Unrealized Exchange rates (gains) / losses from financial assets	6	(359,014,072)	(142,540,807)
Fair value changes in marketable securities	6	(11,143,886)	(2,848,198)
Change in claims provision	21	173,245,906	159,507,694
Change in life mathematical reserves	21	930,012,058	754,633,071
	21		
Change in provision for unearned premiums reserves		10,119,776	(21,937,772)
Change in provision for employment termination benefits	18,30	3,848,481	2,834,898
Intangible asset write off adjustment	12,31	70,129	4,483,171
Rent lease cancelation	14	(27,000,654)	
Change in blockage	5	46,533,620	57,071,623
Operating profit before changes in operating assets / liabilities		1,170,529,349	1,109,814,460
Changes in operating assets and liabilities:			
0 • 0	7.0	(14.405.522)	6 007 014
Change in premium and other insurance receivables	7,8	(14,495,522)	6,907,914
Change in other assets	10	12,864,709	(52,034,860)
Change in deferred expenses	19	(66,494,631)	(24,232,098)
Change in pension business receivables	9	(14,307,427)	(4,359,018)
Change in pension business payables	9	9,007,908	41,068,833
Change in lease liabilities		(695,449)	961,708
Corporate taxes paid		(97,787,546)	(56,035,312)
Cash paid for claims settled during the year, net	21	(154,429,715)	(153,805,807)
Employment termination benefits paid	18	(2,845,022)	(1,603,559)
Change in other liabilities		25,430,127	22,107,789
Net cash provided from / (used in) operating activities		866,776,781	888,790,050
Cash flows from investing activities:			
Acquisition of property and equipment	11	(31,413,799)	(7,484,627)
Acquisition of intangible assets	12	(70,723,695)	(33,095,082)
Disposal of property and equipment	12	23,482,943	66,238
Disposal of intangible assets			00,236
Purchases of financial assets	6	(3,436)	(4 652 227 791)
	6	(1,864,625,036)	(4,653,327,781)
Proceeds from sale of financial assets Interest received	6	1,218,765,137 200,821,134	4,258,607,647 92,484,827
Net cash provided by investing activities		(523,696,752)	(342,748,778)
70.00		(1.50.000.000)	(100,000,000)
Dividend payment	1.4	(160,000,000)	(100,000,000)
Paid rent for lease liabilities	14	(11,543,826)	(12,385,793)
Net cash provided by/(used in) financing activities		(171,543,826)	(112,385,793)
Effect of exchange rates on cash and cash equivalents		(32,428,913)	(17,323,178)
Net increase in cash and cash equivalents		139,107,290	416,332,301
Cash and cash equivalents at the beginning of the year	5	703,099,425	280,374,521
Cash and cash equivalents at the end of the period	5	842,206,715	696,706,822

NOTES TO CONSOLIDATED FINANCIAL INFORMATIONS AS AT SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

1. GENERAL INFORMATION

1.1 Corporate Information

AgeSA Hayat ve Emeklilik Anonim Şirketi ("the Company") was established on October 31, 2007 by the merger of Ak Emeklilik Anonim Şirketi ("Ak Emeklilik") with Aviva Hayat ve Emeklilik Anonim Şirketi (Aviva Emeklilik).

Aviva Europe SE and Haci Ömer Sabancı Holding A.Ş.; each held 49.83% of the shares before offering 19.67% of the shares of the Company to public on November 13, 2014. As a result of the initial public offering, the shares of the Company have been listed on Borsa İstanbul A.Ş. ("BIST") as of November 13, 2014. After the price stabilization activities, the Company's main shareholders' share in partnership were 41.28% each and the percentage of shares which are publicly traded were 17.28%.

Hacı Ömer Sabancı Holding A.Ş. sold its shares with the nominal value of TL 458,956 in BIST on August 5, 2015 and after this disposal, its share in AgeSA Hayat ve Emeklilik Anonim Şirketi decreased to 40%.

Aviva International Holdings Ltd. sold its share with the nominal value of TL 458,956 in BIST on August 5, 2015 and after this sale its share in AgeSA Hayat ve Emeklilik Anonim Şirketi decreased to 40%.

With the Board of Directors' decision dated October 26, 2018, it has been decided to get permission from the Prime Ministry Capital Markets Board, SEDDK and Ministry of Commerce to increase the paid-in capital of the Company by 52.54% and increase from TL 118,000,000 to TL 180,000,000 and to provide the entire increase of TL 62,000,000 from Extraordinary Reserves and to give 52.54% of the shares to each share held by the shareholders. As of September 30, 2021 19.91% of the Company's share have been listed on the Borsa Istanbul ("BIST").

The Company is engaged in pension business and life insurance. The Company also issues insurance policy for personal accident.

The Company's management analysed their relationship with the pension investment funds under IFRS 10, 11 and 12 and concluded that the Company has no control over the pension investment funds.

The Share Purchase Agreement was signed between Ageas Group and Aviva Group on 23 February 2021. Accordingly, Ageas Insurance International NV agreed to take over all of Aviva's shares with a nominal value of TL 72,000,006.72, representing 40% of the capital owned by Aviva. The closing conditions determined in the Share Purchase Agreement have been fulfilled, and all of Aviva's shares representing 40% of the Company's capital were taken over by Ageas Insurance International NV as of 5 May 2021.

The company will continue to operate as a joint venture company with a 40-40% partnership between Sabancı Holding and Ageas Insurance International NV.

The registered office of the Company is Saray Mahallesi Dr. Adnan Büyükdeniz Caddesi No: 12, 34768 Ümraniye, Istanbul - Turkey.

Other contact information of the company is as follows:

Phone : (216) 633 33 33 Fax : (216) 634 35 69

Web : www.agesahayatemeklilik.com.tr

E-mail address : agesa@agesa.hs03.kep.tr

The consolidated financial informations of the Company as at and for the period ended September 30, 2021 comprises the Company and its subsidiary (together referred to as the "Group" and individually as "Group Entities").

NOTES TO CONSOLIDATED FINANCIAL INFORMATIONS AS AT SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

1. GENERAL INFORMATION (Continued)

1.1 Corporate Information (Continued)

The subsidiary; AvivaSA Sigorta Aracılığı A.Ş. has been approved in AvivaSA Emeklilik ve Hayat A.Ş. board of directors meeting dated December 13, 2018 which has officially registered on December 20, 2018 to brokerage insurance and private pension with 2,000,000 TL paid-in capital and 100% subsidiary. Article 2 of the Subsidiary Company's Articles of Association, with regards to "Company Title", was discussed and amended at the Ordinary General Assembly meeting on 24 August 2021 and the new title of "AgeSA Sigorta Aracılığı A.Ş." was registered with the Trade Registry on September 1, 2021.

The Share Purchase Agreement was signed between Ageas Group and Aviva Group on 23 February 2021. Accordingly, Ageas agreed to take over all of Aviva's shares with a nominal value of TL 72,000,006.72, representing 40% of the capital owned by Aviva. The closing conditions determined in the Share Purchase Agreement have been fulfilled, and all of Aviva's shares representing 40% of our Company's capital were taken over by Ageas as of 5 May 2021.

In the new situation, the company will continue its activities as a company subject to joint management with the 40-40% partnership of Sabancı Holding and Ageas.

The address of the registered office of the subsidiary is as follows;

Saray Mahallesi Dr. Adnan Büyükdeniz Caddesi No: 12, 34768 Ümraniye, Istanbul - Turkey.

AgeSA Sigorta ve Aracılığı A.Ş.acts as an agent for all types of insurance policies and pension contracts. The Company also can deal with any other type of business on behalf of and in favour of the Group by the approval of General Assembly.

The average personnel number of the Group is 1,462 employees for the period ended September 30, 2021 (1 January - December 31, 2020: 1,377).

The accompanying consolidated financial informations of the Group for the period ended September 30, 2021 were authorized for issue in accordance with a resolution of the directors on October 27, 2021.

As of September 30, 2021, there are 38 pension investment funds established by the Group (December 31, 2020: 35 pension funds). The pension investment funds established by the Group are as follows:

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

1. GENERAL INFORMATION (Continued)

1.1 Corporate Information (Continued)

Name of Pension Fund	Date of Establishment
Avivasa Emeklilik Ve Hayat A.S. Karma Emeklilik Yatırım Fonu	21 October 2003
Avivasa Emeklilik Ve Hayat A.S. Agresif Değisken Emeklilik Yatırım Fonu	21 October 2003
Avivasa Emeklilik Ve Hayat A.S. Dis Borçlanma Araçları Emeklilik Yatırım Fonu	21 October 2003
Aviyasa Emeklilik Ve Hayat A.S. Orta Vadeli Borçlanma Araçları Emeklilik Yatırım Fonu	21 October 2003
Avivasa Emeklilik Ve Hayat A.S. İkinci Para Piyasası Emeklilik Yatırım Fonu	21 October 2003
Avivasa Emeklilik Ve Hayat A.S. İkinci Değisken Emeklilik Yatırım Fonu	21 October 2003
Avivasa Emeklilik Ve Hayat A.Ş. Kamu Dış Borçlanma Araçları (Abd Doları 5-15 Yıl Vadeli) Emeklilik Yatırım Fonu	8 November 2005
Avivasa Emeklilik Ve Hayat A.Ş. Bıst Temettü 25 Endeksi Emeklilik Yatırım Fonu	28 December 2006
Avivasa Emeklilik Ve Hayat A.Ş. Birinci Para Piyasası Emeklilik Yatırım Fonu	20 August 2003
Avivasa Emeklilik Ve Hayat A.Ş. Borçlanma Araçları Emeklilik Yatırım Fonu	20 August 2003
Avivasa Emeklilik Ve Hayat A.Ş. Dinamik Değişken Emeklilik Yatırım Fonu	20 August 2003
Avivasa Emeklilik Ve Hayat A.Ş. Birinci Değişken Emeklilik Yatırım Fonu	20 August 2003
Avivasa Emeklilik Ve Hayat A.Ş. Hisse Senedi Emeklilik Yatırım Fonu	20 August 2003
Avivasa Emeklilik Ve Hayat A.Ş. Borçlanma Araçları Grup Emeklilik Yatırım Fonu	5 January 2005
Avivasa Emeklilik Ve Hayat A.Ş. Muhafazakar Değişken Emeklilik Yatırım Fonu	5 January 2005
Avivasa Emeklilik Ve Hayat A.Ş. Hisse Senedi Grup Emeklilik Yatırım Fonu	5 January2005
Avivasa Emeklilik Ve Hayat A.Ş. Karma Grup Emeklilik Yatırım Fonu	17 August 2010
Avivasa Emeklilik Ve Hayat A.Ş. Dengeli Değişken Emeklilik Yatırım Fonu	20 December 2011
Avivasa Emeklilik Ve Hayat A.Ş. Katkı Emeklilik Yatırım Fonu	2 May 2013
Avivasa Emeklilik Ve Hayat A.Ş. Standart Emeklilik Yatırım Fonu	2 May 2013
Avivasa Emeklilik Ve Hayat A.Ş. Altın Emeklilik Yatırım Fonu	20 June 2013
Avivasa Emeklilik Ve Hayat A.Ş. Teknoloji Sektörü Yabancı Değişken Emeklilik Yatırım Fonu	10 May 2013
Avivasa Emeklilik Ve Hayat A.Ş. Özel Sektör Borçlanma Araçları Emeklilik Yatırım Fonu	25 October 2013
Avivasa Emeklilik Ve Hayat A.Ş. Başlangıç Emeklilik Yatırım Fonu	12 January 2017
Avivasa Emeklilik Ve Hayat A.Ş. Başlangıç Katılım Emeklilik Yatırım Fonu	12 January 2017
Avivasa Emeklilik Ve Hayat A.Ş. Katılım Standart Emeklilik Yatırım Fonu	26 May 2017
Avivasa Emeklilik Ve Hayat A.S. Oks Dinamik Katılım Değişken Emeklilik Yatırım Fonu	25 December 2017
Avivasa Emeklilik Ve Hayat A.Ş. Oks Agresif Katılım Değişken Emeklilik Yatırım Fonu	25 December 2017
Avivasa Emeklilik Ve Hayat A.Ş. Oks Muhafazakar Değişken Emeklilik Yatırım Fonu	25 December 2017
Avivasa Emeklilik Ve Hayat A.Ş. Oks Dengeli Değişken Emeklilik Yatırım Fonu	25 December 2017
Avivasa Emeklilik Ve Hayat A.Ş. Oks Dinamik Değişken Emeklilik Yatırım Fonu	25 December 2017
Avivasa Emeklilik Ve Hayat A.Ş. Oks Agresif Değişken Emeklilik Yatırım Fonu	25 December 2017
Avivasa Emeklilik Ve Hayat A.Ş. Katılım Katkı Emeklilik Yatırım Fonu Avivasa Emeklilik Ve Hayat A.S. Oks Standart Emeklilik Yatırım Fonu	26 May 2017 2 January 2018
Avivasa Emeklilik Ve Hayat A.S. Oks Katılım Standart Emeklilik Yatırım Fonu	2 January 2018 2 January 2018
Avivasa Emeklilik Ve Hayat A.Ş. Oks Katılım Standarı Emeklilik Yatırım Fonu Avivasa Emeklilik Ve Hayat A.Ş. Birinci Fon Sepeti Emeklilik Yatırım Fonu	2 February 2021
Avivasa Emeklilik Ve Hayat A.Ş. İkinci Fon Sepeti Emeklilik Yatırım Fonu	2 February 2021
Avivasa Emeklilik Ve Hayat A.S. Ücüncü Fon Sepeti Emeklilik Yatırım Fonu	2 February 2021
Avivasa Emekinik ve Hayat A.Ş. Oçuncu Fon Sepeti Emekinik Tatılını Fonu	2 reducing 2021

With the decision of the Board of Directors dated May 6, 2020, the decision to establish the AvivaSA Hayat ve Emeklilik Anonim Şirketi Birinci Fon Sepeti Emeklilik Yatırım Fonu, AvivaSA Hayat ve Emeklilik Anonim Şirketi İkinci Fon Sepeti Emeklilik Yatırım Fonu and AvivaSA Hayat ve Emeklilik Anonim Şirketi Üçüncü Fon Sepeti Emeklilik Yatırım Fonu has been taken and the establishment process has been completed and the public offering of the funds has started on February 2, 2021.

With the decision of the Board of Directors dated 27 October 2020 and with the permission decision of CMB for the AvivaSA Hayat ve Emeklilik Anonim Şirketi Uzun Vadeli Dış Borçlanma Araçları Emeklilik Yatırım Fonu dated December 7, 2020 and numbered E-122933903-325.0103-1244, the change of the title of the AvivaSA Hayat ve Emeklilik Anonim Şirketi Uzun Vadeli Dış Borçlanma Araçları Emeklilik Yatırım Fonu to AvivaSA Hayat ve Emeklilik Anonim Şirketi Orta Vadeli Dış Borçlanma Araçları Emeklilik Yatırım Fonu and the change of the fund type will enter into force as of February 5, 2021.

With the decision of the Board of Directors dated 27 October 2020 and the permission decision of CMB for the AvivaSA Hayat ve Emeklilik Anonim Şirketi B.R.I.C Ülkeleri Yabancı Değişken Emeklilik Yatırım Fonu dated December 7, 2020 and numbered E-122933903-325.0103-1244, the change of the title of the AvivaSA Hayat ve Emeklilik Anonim Şirketi B.R.I.C Ülkeleri Yabancı Değişken Emeklilik Yatırım Fonu to AvivaSA Hayat ve Emeklilik Anonim Şirketi Yeni Teknolojiler Yabancı Değişken Emeklilik Yatırım Fonu and the change of the fund type will come into force as of February 5, 2021.

With the decision of the Board of Directors dated 27 October 2020 and with the permission decision of CMB for the AvivaSA Hayat ve Emeklilik Anonim Şirketi Temettü Ödeyen Şirketler Hisse Senedi Emeklilik Yatırım Fonu dated 11 December 2020 and numbered E-122933903-325.0103-12696, the title of AvivaSA Hayat ve Emeklilik Anonim Şirketi Temettü Ödeyen Şirketler Hisse Senedi Emeklilik Yatırım Fonu to be changed to AvivaSA Hayat ve Emeklilik Anonim Şirketi BİST Temettü 25 Endeksi Emeklilik Yatırım Fonu and the change in the fund type will come into force as of 5 February 2021.

NOTES TO CONSOLIDATED FINANCIAL INFORMATIONS AS AT SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

1. GENERAL INFORMATION (Continued)

1.1 Corporate Information (Continued)

With the Board of Directors Decision dated March 16, 2021, it was decided to establish the Avivasa Emeklilik ve Hayat Katılım Altın Emeklilik Yatırım Fonu.

With the Board of Directors Decision dated August 9, 2021, it was decided to establish the AgeSA Hayat ve Emeklilik A.Ş. Sürdürülebilirlik Hisse Senedi Emeklilik Yatırım Fonu.

With the Board of Directors Decision dated August 9, 2021, it was decided to establish the AgeSA Hayat ve Emeklilik A.Ş. Kıymetli Madenler Fon Sepeti Emeklilik Yatırım Fonu.

As at September 30, 2021 and December 31, 2020 units and amounts of share certificates in circulation are as follows:

	September 3	30, 2021	December 31		
	Number of	Net Asset	Number of	Net Asset	
Share certificates in circulation	Share Certificates	Value (TL)	Share Certificates	Value (TL)	
Avivasa Emeklilik Ve Hayat A.S. Katkı Emeklilik Yatırım Fonu	195,137,191,729	3,738,828,594	185,137,728,419	3,639,252,328	
Avivasa Emeklilik Ve Hayat A.Ş. Ratki Emeklilik Yatırım Fonu	143,796,287,783	7,730,919,820	153,307,402,012	7,463,157,637	
Avivasa Emeklilik Ve Hayat A.Ş. Aldılı Emeklilik Yatırım Fonu	36,927,516,206	597,561,067	35,772,782,543	530,438,820	
Avivasa Emeklilik Ve Hayat A.Ş. Oks Standart Emeklilik Yatırım Fonu	691,119,265	54,814,742	735,071,945	56,227,858	
Avivasa Emeklilik Ve Hayat A.Ş. Agresif Değişken Emeklilik Yatırım Fonu	1,145,499,807	103,556,619	1,059,512,876	91,226,178	
Avivasa Emeklilik Ve Hayat A.Ş. Dış Borçlanma Araçları Emeklilik Yatırım Fonu	24,284,008,142	3,076,735,264	25,643,370,957	2,847,670,701	
Avivasa Emeklilik Ve Hayat A.Ş. Orta Vadeli Borçlanma Araçları Emeklilik Yatırım Fonu	1,692,173,757	134,397,516	1,933,916,637	146,552,203	
Avivasa Emeklilik Ve Hayat A.Ş. İkinci Para Piyasası Emeklilik Yatırım Fonu	1,563,135,338	118,754,518	1,657,064,489	111,132,687	
Avivasa Emeklilik Ve Hayat A.Ş. İkinci Değişken Emeklilik Yatırım Fonu	3,433,818,177	220,691,494	4,295,383,861	240,751,970	
Avivasa Emeklilik Ve Hayat A.Ş. Kamu Dış Borçlanma Araçları Emeklilik Yatırım Fonu	23,376,129,739	2,780,123,110	24,386,450,173	2,533,093,739	
Avivasa Emeklilik Ve Hayat A.Ş. Bıst Temettü 25 Endeksi Emeklilik Yatırım Fonu	1,916,746,949	115,685,262	1,654,135,899	91,405,896	
Avivasa Emeklilik Ve Hayat A.Ş. Birinci Para Piyasası Emeklilik Yatırım Fonu	38,625,358,208	3,117,414,036	39,875,098,015	2,840,941,233	
Avivasa Emeklilik Ve Hayat A.Ş. Borçlanma Araçları Emeklilik Yatırım Fonu	35,397,645,915	2,759,742,066	38,755,798,162	2,873,858,701	
Avivasa Emeklilik Ve Hayat A.Ş. Dinamik Değişken Emeklilik Yatırım Fonu	26,237,840,855	2,424,638,873	27,532,739,952	2,419,962,645	
Avivasa Emeklilik Ve Hayat A.Ş. Birinci Değişken Emeklilik Yatırım Fonu	18,581,119,125	1,671,464,571	18,588,114,111	1,383,736,391	
Avivasa Emeklilik Ve Hayat A.Ş. Hisse Senedi Emeklilik Yatırım Fonu	15,322,013,453	1,620,302,923	15,113,731,517	1,571,843,192	
Avivasa Emeklilik Ve Hayat A.S. Borçlanma Araçları Grup Emeklilik Yatırım Fonu	4,437,379,149	296,195,058	5,044,760,691	318,611,951	
Avivasa Emeklilik Ve Hayat A.S. Muhafazakar Değişken Emeklilik Yatırım Fonu	1,935,008,825	151,768,547	2,138,467,880	148,685,533	
Avivasa Emeklilik Ve Hayat A.Ş. Hisse Senedi Grup Emeklilik Yatırım Fonu	1,289,662,307	138,112,516	1,339,619,319	139,845,540	
Avivasa Emeklilik Ve Hayat A.S. Karma Grup Emeklilik Yatırım Fonu	1,011,383,276	31,243,652	1,019,832,900	30,209,490	
Avivasa Emeklilik Ve Hayat A.Ş. Dengeli Değişken Emeklilik Yatırım Fonu	454,271,523	13,114,819	327,146,863	8,726,315	
Avivasa Emeklilik Ve Hayat A.Ş. Standart Emeklilik Yatırım Fonu	9,342,792,690	182,165,772	10,754,076,849	202,961,692	
Avivasa Emeklilik Ve Hayat A.Ş. Teknoloji Sektörü Yabancı Değişken Emeklilik Yatırım Fonu	11,121,303,487	634,014,390	4,145,922,080	183,411,447	
Avivasa Emeklilik Ve Hayat A.S. Özel Sektör Borçlanma Araçları Emeklilik Yatırım Fonu	4,981,608,207	135,350,295	3,267,547,474	78,192,411	
Avivasa Emeklilik Ve Hayat A.S. Baslangıç Emeklilik Yatırım Fonu	5,045,945,825	99,909,727	4,290,174,844	74,837,810	
Avivasa Emeklilik Ve Hayat A.Ş. Başlangıç Katılım Emeklilik Yatırım Fonu	3,502,234,759	66,220,255	3,019,542,473	50,145,542	
Avivasa Emeklilik Ve Hayat A.Ş. Oks Dinamik Katılım Değişken Emeklilik Yatırım Fonu	581,370,576	12,719,225	451,972,660	9,089,622	
Avivasa Emeklilik Ve Hayat A.Ş. Oks Agresif Katılım Değişken Emeklilik Yatırım Fonu	917,782,515	22,441,618	702,528,596	15,910,165	
Avivasa Emeklilik Ve Hayat A.Ş. Oks Muhafazakar Değişken Emeklilik Yatırım Fonu					
	555,878,781	9,710,091	599,506,315	9,260,574	
Avivasa Emeklilik Ve Hayat A.Ş. Oks Dengeli Değişken Emeklilik Yatırım Fonu	919,319,410	15,967,659	707,473,424	11,248,120	
Avivasa Emeklilik Ve Hayat A.Ş. Oks Dinamik Değişken Emeklilik Yatırım Fonu	1,305,226,376	22,391,159	804,388,912	12,871,027	
Avivasa Emeklilik Ve Hayat A.Ş. Oks Agresif Değişken Emeklilik Yatırım Fonu	1,756,702,792	29,215,724	1,040,921,238	16,315,399	
Avivasa Emeklilik Ve Hayat A.Ş. Oks Katılım Standart Emeklilik Yatırım Fonu	18,133,932,307	323,690,692	18,010,785,501	289,595,420	
Avivasa Emeklilik Ve Hayat A.Ş. Katılım Katkı Emeklilik Yatırım Fonu	1,298,548,976	23,170,009	878,427,920	13,953,828	
Avivasa Emeklilik Ve Hayat A.Ş. Katılım Standart Emeklilik Yatırım Fonu	388,242	8,421	335,911	6,654	
Avivasa Emeklilik Ve Hayat A.Ş. Birinci Fon Sepeti Emeklilik Yatırım Fonu	27,000,853,149	296,550,370	-	-	
Avivasa Emeklilik Ve Hayat A.Ş. İkinci Fon Sepeti Emeklilik Yatırım Fonu	30,480,195,332	329,704,273	-	-	
Avivasa Emeklilik Ve Hayat A.Ş. Üçüncü Fon Sepeti Emeklilik Yatırım Fonu	17,103,270,144	177,908,216	-	-	
	711,302,663,096	33,277,202,963	633,991,733,418	30,455,130,719	
Other Company Participants AgeSA Funds (*)	106,029,924	(5,947,190)	-	-	
Other Company Funds AgeSA Participants (*)	28,301,182	1,202,117	-	-	
	711,436,994,202	33,272,457,890	633,991,733,418	30,455,130,719	

^(*) Within the scope of the Precautionary Decision No. 217 of the 2019 Presidential Annual Program published in the Official Gazette dated 27 October 2018 and numbered 30578 through the Bireysel Emeklilik Fon Alım Satım Platformu (BEFAS) operated by İstanbul Takas ve Saklama Bankası A.Ş., as of July 1, 2021, participants were allowed to trade the funds of other pension companies offered on this platform. Within the scope of the relevant application, AgeSA funds from other companies were not included in the assets, while Agesa participants' funds of other companies were included in the assets.

	September 30	0, 2021	December 31, 2020		
Double action and Course	Number of Share	Net Asset	Number of Share Certificates	Net Asset	
Participation certificates at the Group	Certificates	Value (TL)	Certificates	Value (TL)	
AgeSA Hayat ve Emeklilik Anonim Şirketi Katılım Standart EYF	38,881,179	843,333	38,933,510	771,273	
	38,881,179	843,333	38,933,510	771,273	

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

2. ACCOUNTING POLICIES

2.1 Basis of preparation

The consolidated financial informations have been prepared on the historical cost basis except for certain financial instruments that are measured at fair values. Historical cost is generally based on the fair value of the consideration given in exchange for assets.

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date, regardless of whether that price is directly observable or estimated using another valuation technique. In estimating the fair value of an asset or a liability, the Group takes into account the characteristics of the asset or liability if market participants would take those characteristics into account when pricing the asset or liability at the measurement date.

In addition, for financial reporting purposes, fair value measurements are categorized into Level 1, 2 or 3 based on the degree to which the inputs to the fair value measurements are observable and the significance of the inputs to the fair value measurement in its entirety, which are described as follows:

- Level 1 inputs are quoted prices (unadjusted) in active markets for identical assets or liabilities that the
 entity can access at the measurement date;
- Level 2 inputs are inputs, other than quoted prices included within Level 1, that are observable for the asset or liability, either directly or indirectly; and
- Level 3 inputs are unobservable inputs for the asset or liability.

2.2 Basis of consolidation

The accompanying consolidated financial informations comprise of the consolidated financial informations of the parent company "AgeSA Hayat ve Emeklilik Anonim Şirketi" and its subsidiary ("AgeSA Sigorta Aracılığı A.Ş.", wholly owned by the Company) prepared on the basis set out in sections below. The consolidated financial informations of the entities included in the consolidation have been prepared as at the date of these consolidated financial informations.

Subsidiary

Subsidiary is the entity controlled by the Group. The consolidated financial informations of the subsidiary is included in the consolidated financial informations from the date that control commences.

Transactions eliminated on consolidation

Intra-group balances and transactions, and any unrealized income and expenses arising from intra-group transactions, are eliminated in preparing the consolidated financial informations.

2.3 Summary of significant accounting policies

Written premiums

Written premiums represent the policies on cancellations from prior years and premiums ceded to reinsurers and after tax deduction in addition to the policies written in the current year. Annual, long term and saving policies are accounted according to the accrual basis. For unit-linked life savings policies, premiums are recognized on a collection basis.

Premiums ceded to reinsurers

Premiums ceded to reinsurers consist of the premiums that are attributable to reinsurers in accordance with the provisions of the respective reinsurance contracts.

NOTES TO CONSOLIDATED FINANCIAL INFORMATIONS AS AT SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

2. ACCOUNTING POLICIES (Continued)

2.3 Summary of significant accounting policies (Continued)

Net change in provision for unearned premium reserves

The portion of written premiums attributable to subsequent periods (gross of commission payable to intermediaries) is deferred as a provision for unearned premiums. The change in this provision is recognized as revenue in the information of profit or loss over the period of risk.

Unit-linked life savings policies (except for a small amount of mortality deductions relating to the life savings business) and long-term life insurance policies are not subject to unearned premium reserves.

Net change in mathematical reserves

Life insurance mathematical reserves are calculated according to actuarial principles on a prudent basis in order to ensure liabilities are fully met for policies longer than one year. Mathematical reserves are calculated on a prospective basis as the difference between the present value of liabilities and future premiums to be paid by the policyholders. The change in this provision is recognized as revenue in the information of profit or loss over the period of risk.

Income generated from pension business

Fees received from the pension business consist of (i) fund management fees, (ii) premium holiday charges, (iii) entry and deferred entry fees and (iv) account management fees and deferred income reserves. Revenues arising from fund management and other related services offered by the Group are recognized in the accounting period during which the service is rendered.

Fund management fees, which are calculated with reference to assets under management, are attributable to the hardware, software, personnel and accounting services provided to pension funds, Management fees are attributable to the operational costs of the services rendered to customers by the Group and can be deducted from the participants' funds. Premium holiday charges may be received when the participant does not pay his or her regular premium within three months of being due. Entry fees are fees received from the participant when he or she first enters the pension system and from any participants who have already entered into the system but create a new account in another pension company. Deferred entry fees may be charged to the participant and recorded as income in the event that he or she exits, merges or transfers accounts within the context of conditions defined in the contract as of the effective date of contract. Account management fees and deferred account management fees, which is effective with the BES 3.0 legislation, entered into force on January 1, 2016, and the reduction from contracts established in 2016. Effective from January 1, 2018 IAS 18 revenue recognition principle was replaced by IFRS 15 Revenue from contracts and it also requires the deferral of upfront fees over the life time of contracts. Management fees starting from 2016 are capped to 5 years according to new legislation, total of management fees are subject to deferral regarding IFRS 15. Also the entry fees recognized as revenue between the years 2013-2015 are deferred under IFRS 15. The Group applied 7 years for the average duration of the portfolio in line with the 7 years DAC amortization period estimate (31 December 2020: 7 years).

Pension fees are subject to limitations and caps in the form of maximum fees collectible from pension customers set out in the local regulation on pension system.

In the payment amounts and collection process were made regulation pursuant to "Amendment Regulation of Regulation on Individual Retirement System" came into force dated January 1, 2016. Deductions were able to receive from the accumulation of the participant with this regulation during five years within the scope of limits and rules.

For agreements which came into force dated before January 1, 2016, there will be no deduction from the agreements which filled 5 years as of the effective date even defined.

For the agreements which did not fill 5 years as of the effective date, if there is deduction over the annual limit, there will be no deduction until the anniversary, if there is deduction over 5 years limit, there is not any deduction as of this date. There can be entrance fee and administrative expense deduction in the first five years, exit without mandatory reasons, in case of leaving provided that defined to the product within the limits as of the effective date of agreement.

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

2. ACCOUNTING POLICIES (Continued)

2.3 Summary of significant accounting policies (Continued)

Income generated from pension business (Continued)

For the agreements which came into force dated after January 1, 2016; "Deferred Entrance Fee" can be deducted from the saving of the participant in the first five years for the policies which exits without mandatory reasons provided that it is defined to the product within the limits of regulation and rules.

Investment and other income (expense), net

Net investment and other income (expense) comprises interest income, net profit and loss on realization, dividend income, other income and expenses and investment management expenses.

Interest income is recognized in profit or loss using the effective interest method. The effective interest rate is the rate that exactly discounts the estimated future cash receipts through the expected life of the financial asset (or, where appropriate, a shorter period) to the carrying amount of the financial asset.

The calculation of the effective interest rate includes all fees and points paid or received transaction costs, and discounts or premiums that are an integral part of the effective interest rate. Transaction costs are incremental costs that are directly attributable to the acquisition, issue or disposal of a financial asset.

Interest income presented in the information of comprehensive income includes:

- interest on financial assets at amortized cost on an effective interest rate basis,
- interest on available-for-sale financial assets on an effective interest rate basis,
- interest earned till the disposal of financial assets at fair value through profit or loss.

Net profit and loss on realization includes gains and losses arising from disposals of financial assets at fair value through profit or loss and available-for-sale financial assets.

Commission income and commission expenses

The Group receives commission income from reinsurance companies in respect of the ceded premiums in its life protection, personal accident and life savings business segments. Commission income is recognized on an accrual basis

Commission expenses include third-party commissions paid in respect of the distribution of the Group's life protection, life savings and personal accident business products through external channels including banks, agencies and brokers, and change in deferred acquisition costs. It does not include any distribution commissions for pension products, which are recorded separately under pension expenses including commissions. Commission expenses are recognized on an accrual basis.

Claims paid and change in outstanding claims provisions

Claims are recognized in the period in which they occur, based on reported claims or on the basis of estimates when not reported. The claims provision is the total estimated ultimate cost of settling all claims arising from events, which have occurred up to the end of the accounting period. Full provision is accounted for outstanding claims, including claim settlements reported at the period-end. Incurred but not reported claims are also provided for under the provision for outstanding claims, presented in insurance contract liabilities.

Pension expenses including commission

Pension business expenses primarily consist of (i) pension business commissions paid to third parties, (ii) fund management charges paid to asset management companies, (iii) service charges of the Pension Monitoring Center (EGM), Takasbank and the custodian bank of pension funds and (iv) other pension business-related expenses.

Commissions paid to banks and agencies for distribution of the Group's pension products are recognized (net of deferred acquisition cost) under pension expenses. As required under Turkish pension regulations, the Group's pension funds are managed by third party asset manager(s) who receive asset management fees according to the terms specified in the agreement signed between the parties and such management fees are recorded under pension expenses.

NOTES TO CONSOLIDATED FINANCIAL INFORMATIONS AS AT SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

2. **ACCOUNTING POLICIES (Continued)**

2.3 **Summary of significant accounting policies (Continued)**

Cash and cash equivalents

In terms of presentation of cash flow information, cash and cash equivalents comprise cash at hand, demand deposits and other short-term highly liquid investments with original maturities of three months or less, which are readily convertible to cash and are subject to an insignificant risk of changes in value.

Property and equipment

The property and equipment purchased subsequent to this date are recorded at their historical cost. Accordingly, property and equipment are carried at cost, less accumulated depreciation and impairment losses. Depreciation is calculated using the straight-line method to write down the cost of such assets to their residual values over their estimated useful lives as follows:

2-15 years

4 years

4-5 years

Furniture and fixtures Machinery and equipment Other tangible assets Leasehold improvements 5 years or term of rent contract

Where the carrying amount of an asset is greater than its estimated recoverable amount (higher of net selling price and value in use), it is written down immediately to its recoverable amount. Gains and losses on disposal of property and equipment are determined by reference to their carrying amount and are taken into account in determining operating profit.

Right of use assets and lease liabilities

Leases are recognized as a right-of-use asset and a corresponding liability at the date at which the leased asset is available for use by the Group. Each lease payment is allocated between the liability and finance cost. The finance cost is charged to profit or loss over the lease period so as to produce a constant periodic rate of interest on the remaining balance of the liability for each period. The right of use asset is depreciated over the lease term on a straight line basis.

The lease payments are discounted using the interest rate implicit in the lease. If that rate cannot be determined, the lessee's incremental borrowing rate is used, being the rate that the lessee would have to pay to borrow the funds necessary to obtain an asset of similar economic environment with similar terms and conditions. As of 30 September 2021, the alternative borrowing rates used by the Group for Turkish Lira leases are 25% annually for leases before 2021 and 18% for 2021 leases. As of 30 September 2021, the Group has no foreign currency lease obligations.

Intangible assets

Intangible assets mainly comprise computer software and internally generated software. They are recorded at acquisition cost and amortized on a straight-line basis over their estimated useful lives as three to five years from the acquisition date. Where an indication of impairment exists, the carrying amount of intangible assets is assessed and written down immediately to its recoverable amount.

Construction in progress refers to the Group's software development projects to unify the basic insurance applications used within the structure of the Group and to use such applications by integration to all the surrounding systems. Personnel expenses and cost of the outsourced services associated directly with the development of the application are capitalised as incurred.

Financial instruments

Recognition

The Group initially recognizes loans and advances on the date which they are originated. Regular way of purchase and sales of financial assets are recognized on the trade date which the Group commits to purchase or sell the asset. All other financial assets and liabilities are initially recognized on the trade date at which the Group becomes a party to contractual provisions of the instrument.

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

2. ACCOUNTING POLICIES (Continued)

2.3 Summary of significant accounting policies (Continued)

Classification

The Group classifies its investments into the following categories: financial assets at fair value through profit or loss, loans and receivables, and available-for-sale financial assets. The classification depends on the purpose for which the investments were acquired. Management determines the classification of its financial assets at initial recognition and re-evaluates this at every reporting date.

Financial assets at fair value through profit or loss: Financial asset is classified into this category at inception if acquired principally for the purpose of selling in the short term, or if it forms part of a portfolio of financial assets in which there is evidence of short term profit making.

Available-for-sale financial assets: Available-for-sale ("AFS") financial assets intended to be held for an indefinite period of time, which may be sold in response to needs for liquidity or changes in interest rates, exchange rates or equity prices, are classified as available-for-sale. Assets backing long term insurance contracts are classified as available-for-sale financial assets in the accompanying consolidated financial informations.

Financial investments with risks on policyholders classified as available for sale: Financial investments with risks on policyholders classified as available for sale consist of public securities, foreign currency Eurobonds and time deposits.

Loans and receivables: Loans and receivables are non-derivative financial assets with fixed or determinable payments that are not quoted in an active market other than those that the Group intends to sell in the short term or that it has designated as at fair value through profit or loss or available-for-sale. They arise when the Group provides money, goods and services directly to a debtor with no intention of trading the receivable.

Financial liability: Financial liability is any liability that is a contractual obligation to deliver cash or another financial asset to another entity.

Measurement

A financial asset or liability is measured initially at fair value plus, for an item not at fair value through profit or loss, transaction costs that are directly attributable to its acquisition or issue.

Subsequent to initial recognition, financial assets at fair value through profit or loss and available-for-sale financial assets are measured at fair values, except that any equity instrument that does not have a quoted market price in an active market and whose fair value cannot be reliably measured is stated at cost.

Gains and losses arising from changes in the fair value of financial assets at fair value through profit or loss are recognized in the information of comprehensive income in the period in which they arise. Unrealized gains and losses arising from changes in the fair values of available-for-sale financial assets are recognized in equity as "Fair value reserves from available-for-sale financial assets". When available-for-sale financial assets are sold or impaired, the accumulated fair value reserves under equity are transferred to the information of comprehensive income as net realized gains/losses on financial assets.

All non-trading financial liabilities, loans and receivables are measured at amortized cost less impairment losses, if any. Amortized cost is calculated on the effective interest method. Premiums and discounts, including initial transaction costs, are included in the carrying amount of the related instrument and amortized based on the effective interest rate of the financial instruments.

Fair value measurement principles

The fair value of financial instruments is based on their quoted market price at the reporting date without any deduction for transaction costs. If a quoted market price is not available, the fair value of the instrument is estimated using pricing models or discounted cash flow techniques. Where discounted cash flow techniques are used, estimated future cash flows are based on management's best estimates and the discount rate is a market related rate at the reporting date for an instrument with similar terms and conditions. Where pricing models are used, inputs are based on market related measures at the reporting date.

NOTES TO CONSOLIDATED FINANCIAL INFORMATIONS AS AT SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

2. ACCOUNTING POLICIES (Continued)

2.3 Summary of significant accounting policies (Continued)

Derecognition

A financial asset is derecognized when the control over the contractual rights that comprise that asset, is lost. This occurs when the rights are realized, expire or are surrendered. The Group derecognizes a financial liability when its contractual obligations are discharged or cancelled or expired.

Available-for-sale financial assets and financial assets at fair value through profit or loss that are sold are derecognized and corresponding receivables from the buyer for the payment are recognized as at the date the Group commits to sell the assets. The specific identification method is used to determine the gain or loss on derecognition.

Offsetting

Financial assets and liabilities are offset and the net amount is reported in the information of financial position when there is a currently enforceable legal right to set off the recognized amounts and there is an intention to settle on a net basis or realize the asset and settle the liability simultaneously.

Impairment of financial assets

Premium and other insurance receivables

In determining whether an impairment loss should be recorded in profit or loss, the Group makes judgments as to whether there is any observable data indicating that there is a measurable decrease in the estimated amounts recoverable from a portfolio of premiums, other insurance receivables and individual premiums. Objective evidence that a financial asset or group of assets is impaired includes observable data that comes to the attention of the Group about the following loss events:

- (a) significant financial difficulty of the agency or debtor;
- (b) the Group granting to the agency, for economic or legal reasons relating to the agency's financial difficulty, a concession that the lender would not otherwise consider;
- (c) it is probable that the agency will declare bankruptcy or enter into other financial reorganization;
- (d) the disappearance of an active market for the related financial asset because of financial difficulties; or
- (e) observable data indicating that there is a measurable decrease in the estimated future cash flows from a group of financial assets since the initial recognition of those assets, although the decrease cannot yet be identified with the individual financial assets in the group, including:
 - (i) adverse changes in the payment status of agencies; or
 - (ii) national or local economic conditions that correlate with defaults on the assets in the group.

If there is objective evidence that there occurs an impairment loss on receivables, the amount of the loss is measured based on the difference between the asset's carrying amount and the estimated recoverable amount. The carrying amount of the asset is reduced through the use of an allowance account. The amount of the loss is recognized in profit or loss.

If, in a subsequent period, the amount of the impairment loss decreases and the decrease can be related objectively to an event occurring after the impairment was recognized (such as an improvement in the debtor's credit rating), the previously recognized impairment loss is reversed by adjusting the allowance account. Any subsequent reversal of impairment loss is recognized in the information of comprehensive income, to the extent that the carrying value of the asset does not exceed its cost at the reversal date.

A write off is made when all or part of a premium receivable is deemed uncollectible or in the case of debt forgiveness. Such premium receivables are written off after all the necessary procedures have been completed and the amount of the loss has been determined. Write offs are charged against previously established allowances and reduce the amount of the insurance receivable. Subsequent recoveries of amounts previously written off are included in information of profit or loss.

The methodology and assumptions used for estimating both the amount and timing of recoverable amounts are reviewed regularly to reduce any differences between loss estimates and actual loss experience.

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

2. ACCOUNTING POLICIES (Continued)

2.3 Summary of significant accounting policies (Continued)

Available-for-sale financial assets

If an available-for-sale investment security is impaired, an amount comprising the difference between its cost (net of any principal payment and amortization) and its current fair value, less any impairment loss previously recognized in profit or loss, is transferred from equity to the profit or loss. Reversals of impairment losses on debt instruments are reversed through profit or loss; if the increase in fair value of the instrument can be objectively related to an event occurring after the impairment loss was recognized in profit or loss.

Reinsurance assets

If the reinsurance asset is impaired, the Group reduces its carrying amount accordingly and recognizes that impairment loss in the information of profit or loss. A reinsurance asset is impaired if, and only if:

- (a) there is objective evidence, as a result of an event that occurred after initial recognition of the reinsurance asset, that the Group may not receive all amounts and
- (b) that event has a reliably measurable impact on the amounts that the Group will receive from the reinsurer.

An insurance contract is a contract under which the Group accepts significant insurance risk from another party (the policyholder) by agreeing to compensate the policyholder if a specified uncertain future event (the insured event) adversely affects the policyholder. Insurance risk covers all risks except for financial risks. All premiums written within the coverage of insurance contracts are recognized as revenue under "written premiums" account.

Investment contracts are those contracts which transfer financial risk without significant insurance risk. Financial risk is the risk of a possible future change in a specified interest rate, financial instrument price, commodity price, foreign exchange rate, index of prices or rates, credit rating or credit index or other variable, provided, that it is not specific to a party to the contract, in the case of a non-financial variable.

Insurance contracts

Insurance contracts are contracts that provide protection to the insured against adverse economic consequences of an event of loss as covered under the terms and conditions stipulated in the insurance policy according to IFRS 4.

Financial Guarantee Contract is a contract which requires that the issuer make specific payments to reimburse the holder for the loss incurred by the debtor when a specific breach of its obligation to pay, in accordance with the conditions, original or amended, of a debt instrument.

According to IFRS 4, financial risk is the risk posed by a possible future change in one or more of the following variables: an interest rate specified the price of a financial instrument, the price of a commodity trading, an exchange rate, a price index or interest, a credit rating or an index or other variable. If this is a nonfinancial variable, it is necessary that the variable is not specific to one of the parties to the contract.

According to this, insurance contracts include changes in market prices, as well as insurance risk.

Some policies (Saving Life Policies) of the Group include financial return in addition to insurance risk and carry financial risk, accordingly. However these contracts are defined as insurance contracts also and accounted in this context. Because there are no contracts with a stand-alone financial risk in the Group's portfolio and contracts carry significant insurance risk, mentioned policies are within the context of insurance contracts.

All policies in the Group portfolio are treated as insurance contracts.

NOTES TO CONSOLIDATED FINANCIAL INFORMATIONS AS AT SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

2. ACCOUNTING POLICIES (Continued)

2.3 Summary of significant accounting policies (Continued)

Liability adequacy test

At each reporting date, an assessment is made of whether the recognized long-term business provisions are adequate, using current estimates of future cash flows. A liability adequacy test is required to ensure that losses do not remain unrecognized.

- a) the test considers current estimates of all contractual cash flows, and of related cash flows such as claims handling costs, as well as cash flows resulting from embedded options and guarantees; and
- b) if the best test shows that the liability is inadequate, the entire deficiency is recognised in profit or loss.

Deferred acquisition costs (DAC)

Those direct and indirect costs incurred during the financial period arising from the writing or renewing of insurance contracts, are deferred to the extent that these costs are recoverable out of future premiums. All other acquisition costs are recognised as an expense when incurred.

Incremental direct costs which are essential to the contract transaction are subject to deferral. During the deferral of salaries, benefits and other costs, two criterias are evaluated and should be met; must have a direct role in acquisition activities and must be an essential activity resulting in the contract being issued. The Group management has identified that when the following criterias are met, expenses are subjected to deferral:

- Stand-alone direct sales force sales teams and sales managers' commissions
- Bancassurance coaches' and sales managers' commissions
- Corporate sales teams commissions
- Third party, Akbank T.A.Ş. and agency commissions

Subsequent to initial recognition, DAC for life insurance are amortized over the expected life of the contracts as a constant percentage of expected premiums. Deferred commissions for personal accident insurance products are amortized over the period in which the related revenues are earned. The reinsurers' share of deferred commissions is amortized in the same manner as the underlying asset amortization is recorded in profit or loss.

Deferral periods can be the average life-time of the contracts (which are longer than the lapse assumptions). The Group management has determined the life time period as seven years for pension contracts and as nine years for ROP products. The amount of DAC is subject to Liability Adequacy Test each year. The Group has applied straight line method for the amortization of DAC.

Provision for unearned premiums

The proportion of written premiums, gross of commission payable to intermediaries, attributable to subsequent periods is deferred as a provision for unearned premiums. The change in this provision is taken to profit or loss as recognition of revenue over the period of risk.

Unearned premium reserve is calculated on a daily basis for all policies in force as of information of financial position date for unearned portions of premiums written. During the calculation of unearned portion of premiums written on a daily basis, it is supposed that the policies start at 12:00 noon and end at 12:00 noon again. Unearned premium reserve and the reinsurers' share of the unearned premium reserve for policies, are calculated and recorded as the deferred portion of the accrued premiums related to the policies in force and ceded premiums to reinsurers without deducting commissions or any other deduction, on a daily and gross basis.

Provision for outstanding claims/IBNR

Outstanding claims reserve represents the estimate of the total reported costs of notified claims on an individual case basis at the reporting date as well as the corresponding handling costs. A provision for claims incurred but not reported ("IBNR") is also established as described below.

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

2. ACCOUNTING POLICIES (Continued)

2.3 Summary of significant accounting policies (Continued)

Provision for outstanding claims/IBNR (Continued)

Estimates have to be made both for the expected ultimate cost of claims reported at the reporting date and for the expected ultimate cost of IBNR claims at the reporting date. It can take a significant period of time before the ultimate claims cost can be established with certainty. The primary technique adopted by management in estimating the cost of IBNR claims, is that of using past claim settlement trends to predict future claims settlement trends. At each reporting date, prior year claims estimates are reassessed for adequacy and changes are made to the provision. In addition to that, the Group also reassesses its notified claims provision at each reporting date on each claim file basis.

Mathematical reserves

Actuarial mathematical reserves are the difference between the premiums received for the risk undertaken by the companies and the cash values of the liabilities to the policyholders and beneficiaries. Actuarial mathematical reserves are calculated according to the formulas and principles specified in the technical principles of the tariffs for life insurance for more than one year and as of September 30, 2021, the company performs mathematical calculations based on Treasury approved tariffs. Actuarial mathematical reserves are calculated as the difference between the cash value of the insurer's future obligations and the present value of the premiums to be paid by the insurer in the future (prospective method).

Insurance companies operating in life branch allocate mathematical reserves, adequately according to actuarial principles, for long-term life policies in order to meet its obligations to beneficiaries and policyholders.

Mathematical reserves consist of actuarial mathematical reserves and profit share reserves, share of policyholders, determined from the income generated from mathematical reserves directed towards investment, that are calculated separately for each effective policy, in accordance with the technical principles in the tariffs.

Actuarial mathematical reserves are the difference between the premiums received for the risks assumed and cash value of liabilities to policyholders and beneficiaries. Actuarial mathematical reserves are provided for life insurance having more than one year of maturity, based on the formulas and elements of technical principles. Mathematical reserves are calculated on a prospective basis as the difference between the present value of liabilities and future premiums to be paid by the policyholders.

Profit share reserves consist of the income obtained from assets in relation to reserves provided for the obligations for the policyholders and beneficiaries in contracts for which the Group has committed to distribute profit shares; the guaranteed portion, not to exceed the technical interest income calculated based on the profit share distribution system prescribed in the approved technical principles of profit share and prior years' accumulated profit share reserves.

The Company applies deductions in accordance with the tariff technical principles of the product for the mathematical reserves of the policies exempt from premium payment (paid-up policy) within the scope of Return of Premium product. As stated in Article 1502 of the TCC, in insurance exempt from premium payment, the insurance amount is paid according to the ratio between the premium paid and the premium payable pursuant to the contract. Due to the expected changes in the legislation, it is expected that additional liabilities will occur in mathematical reserve calculations for the policies that are in the paid-up status and have not matured yet. The company has not made any adjustments to the paid-up mathematical reserve amount of TL 74,2 million recorded as of September 30, 2021, since the legislation has not yet been published. In the event that the risks subject to the above-mentioned calculations materialize in the upcoming periods, the period profitability and capital adequacy calculations for the said periods may be significantly affected.

NOTES TO CONSOLIDATED FINANCIAL INFORMATIONS AS AT SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

2. ACCOUNTING POLICIES (Continued)

2.3 Summary of significant accounting policies (Continued)

Reinsurance contracts held

Contracts entered into by the Group with reinsurers under which the Group is compensated for losses on one or more life insurance contracts issued by the Group, and that meet the classification requirements for insurance contracts are classified as reinsurance contracts held. Reinsurance liabilities are primarily reinsurance premiums payable to reinsurance contracts and are recognized as an expense when due.

Reinsurance cessions of the Group are made on risk premium basis with regard to death benefit and supplementary benefits. For group and individual life reinsurance surplus agreements, cessions are made to the treaty reinsurers according to shares of the surplus amounts in excess of the Group retention limits which are approved by the Turkish Treasury.

Pension business

The Group provides group and individual plans to customers.

The Group offers 38 pension investment funds (2020: 35). These pension funds are in different risk profiles according to the portfolio composition of the funds. The participants choose from among different pension funds within legal limitations and determine allocation rates for contributions and additional contributions according to the contract provisions. The participants gain right for retirement provided that they remain in the pension system for at least 10 years, pay contributions for at least 10 years and attain 56 years of age.

Pension business receivables consist of 'receivable from pension investment funds for fund management fees', 'entry fee receivable from participants' and 'receivables from clearing house on behalf of the participants'. 'Receivable from pension investment funds for fund management fees' are the fees charged to the pension funds against for the administration of related pension funds which consist of fees which are not collected in the same day.

Pension business payables include participants' temporary accounts, and payables to pension agencies. Pension business payables consist of payables to intermediaries in pension business, payables to custodians and payables to the Pension Monitoring Centre. The temporary accounts of participants consist of funds of participant which are yet not directed to investments and of payables due to sale of investments net of any entry fee payables by the participants and other deductions of participants who will either leave the pension business or who will transfer their funds to another insurance company. In case where collections from participants are performed or where cash is transferred to the Group subsequent to the sale of investments of the participants, the pension business payable account is credited. When the funds of participants are directed to investments or where the participants' funds are transferred to another insurance company the account is debited.

Employee benefits

Provision for Termination Benefit Obligations

Provision for Termination Benefit Obligations represents the present value of the estimated future probable obligation of the Group arising from the retirement of the employees and calculated in accordance with the Turkish Labour Law. It is computed and reflected in the consolidated financial informations on an accrual basis as it is earned by serving employees. The computation of the liabilities is based upon the retirement pay ceiling announced by the Government. The maximum amount of TL 8,285 effective as of September 30, 2021 (December 31, 2020: TL 7,117) has been taken into consideration during calculation of provision from employment termination benefits.

IAS 19 - *Employee benefits* requires actuarial valuation methods to be developed to estimate the Group's obligation for termination benefits. The principal statistical assumptions used in the calculation of the total liability in the accompanying consolidated financial informations at September 30, 2021 and December 31, 2020 is as follows:

	September 30, 2021 (%)	December 31, 2020 (%)
Expected rate of salary/yearly limit increase	8.50	8.50
Yearly iscount rate	13.50	13.50

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

2. ACCOUNTING POLICIES (Continued)

2.3 Summary of significant accounting policies (Continued)

Other benefits to employees

The Group has provided for undiscounted short-term employee benefits earned during the period as per services rendered in compliance with *IAS 19* in the accompanying consolidated financial informations.

Income on/Expense from Pension Operations

Details of income and expenses from pension operations are explained in detail in "e) Income generated from pension business" and "i) Pension expenses including commission above".

Provisions

A provision is recognized when, and only when, the Group has a present obligation (legal or constructive) as a result of a past event and it is probable (i.e. more likely than not) that an outflow of resources embodying economic benefits will be required to settle the obligation, and a reliable estimate can be made of the amount of the obligation. Provisions are reviewed at each reporting date and adjusted to reflect the current best estimate.

Where the effect of the time value of money is the amount of a provision is the present value of the expenditures expected to be required to settle the obligation.

Taxes on income

The tax expense represents the sum of the tax currently payable and deferred tax.

Current tax

The tax currently payable is based on taxable profit for the year. Taxable profit differs from net profit as reported in the information of profit or loss because it excludes items of income or expense that are taxable or deductible in other years and it further excludes items that are never taxable or deductible. The Group's liability for current tax is calculated using tax rates that have been enacted or substantively enacted by the balance sheet date.

Deferred tax

Deferred tax is the tax expected to be payable or recoverable on differences between the carrying amounts of assets and liabilities in the consolidated financial informations and the corresponding tax bases used in the computation of taxable profit, and is accounted for using the balance sheet liability method. Deferred tax liabilities are generally recognised for all taxable temporary differences and deferred tax assets are recognised to the extent that it is probable that taxable profits will be available against which deductible temporary differences can be utilised. Such assets and liabilities are not recognised if the temporary difference arises from the initial recognition of goodwill or from the initial recognition (other than in a business combination) of other assets and liabilities in a transaction that affects neither the taxable profit nor the accounting profit.

Deferred tax liabilities are recognised for taxable temporary differences arising on investments in subsidiaries and associates, and interests in joint ventures, except where the Group is able to control the reversal of the temporary difference and it is probable that the temporary difference will not reverse in the foreseeable future.

The carrying amount of deferred tax assets is reviewed at each balance sheet date and reduced to the extent that it is no longer probable that sufficient taxable profits will be available to allow all or part of the asset to be recovered.

Deferred tax is calculated at the tax rates that are expected to apply in the period when the liability is settled or the asset is realized based on tax laws and rates that have been enacted or substantively enacted at the balance sheet date. Deferred tax is charged or credited in the income information, except when it relates to items charged or credited in other comprehensive income, in which case the deferred tax is also dealt with in other comprehensive income.

Deferred tax assets and liabilities are offset when there is a legally enforceable right to set off current tax assets against current tax liabilities and when they relate to income taxes levied by the same taxation authority and the Group intends to settle its current tax assets and liabilities on a net basis.

NOTES TO CONSOLIDATED FINANCIAL INFORMATIONS AS AT SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

2. ACCOUNTING POLICIES (Continued)

2.3 Summary of significant accounting policies (Continued)

Related parties

Parties are considered related to the Group if;

- (a) A person or a close member of that person's family is related to a reporting entity if that person:
 - (i) has control or joint control over the reporting entity;
 - (ii) has significant influence over the reporting entity; or
 - (iii) is a member of the key management personnel of the reporting entity or of a parent of the reporting entity.
- (b) An entity is related to a reporting entity if any of the following conditions applies:
 - (i) The entity and the reporting entity are members of the same group (which means that each parent, subsidiary and fellow subsidiary is related to the others).
 - (ii) One entity is an associate or joint venture of the other entity (or an associate or joint venture of a member of a group of which the other entity is a member).
 - (iii) Both entities are joint ventures of the same third party.
 - (iv) One entity is a joint venture of a third entity and the other entity is an associate of the third entity.
 - (v) The entity is a post-employment benefit plan for the benefit of employees of either the reporting entity or an entity related to the reporting entity. If the reporting entity is itself such a plan, the sponsoring employers are also related to the reporting entity.
 - (vi) The entity is controlled or jointly controlled by a person identified in (a).
 - (vii) A person identified in (a) (i) has significant influence over the entity or is a member of the key management personnel of the entity (or of a parent of the entity).

A related party transaction is a transfer of resources, services or obligations between related parties, regardless of whether a price is charged.

The Group management, groups associated to Sabancı Holding and Aviva are defined as related parties.

Foreign currency transactions

Transactions are recorded in TL, which represents the Group's functional currency. Transactions denominated in foreign currencies are recorded at the exchange rates ruling at the dates of the transactions. Foreign currency denominated monetary assets and liabilities are converted into TL at the exchange rates ruling at the reporting date with the resulting exchange differences recognized in profit or loss as foreign exchange gains or losses.

Pursuant to the announcement of the Public Oversight dated 15 March 2021, assets in foreign currency were valued at the Central Bank of the Republic of Turkey (TCMB) foreign exchange buying rate valid at the end of the reporting period, and monetary liabilities in foreign currency were valued with the effective TCMB foreign exchange selling rate as of the end of the reporting period. In the valuation of the liabilities, if a rate is determined on the contract, the exchange rate written in the contract is taken into account first. Unit-based policies are valued with the TCMB foreign exchange buying rate, while dividend policies are valued with the TCMB effective selling rate.

As of the balance sheet date of September 30, 2021, foreign currency receivables and debts are valued with the TCMB foreign exchange buying rates. In the valuation of liabilities, if an exchange rate is determined on the contract, the exchange rates written in the contract are taken into account. is valued with the TCMB effective selling rate.

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

2. ACCOUNTING POLICIES (Continued)

2.3 Summary of significant accounting policies (Continued)

Foreign currency transactions(Continued)

Foreign currency assets and liabilities are converted by using period end exchange rates of Central Bank of the Republic of Turkey's bid rates.

The Central Bank of the Republic of Turkey exchange rates used in the conversion is as follows:

	Sep	tember 30, 202	1	Dece	mber 31, 2020	
	USD / TL	Euro / TL	GBP / TL	USD / TL	Euro / TL	GBP / TL
Bid Rates	8.8785	10.2933	11.9175	7.3405	9.0079	9.9438
Ask Rates	8.9078	10.3273	11.9797	7.3647	9.0376	10.0107

Segment reporting

Reporting segments are determined to conform to the reporting made to the Group's chief operating decision maker. The chief operating decision maker is responsible for making decisions about resources to be allocated to the segment and assess its performance. Details related to the segment reporting are disclosed in the Note 3.

2.4 Changes in accounting policy and disclosures

Consolidated financial informations of the Group have been prepared comparatively with the prior period in order to give information about financial position and performance. If the presentation or classification of the consolidated financial informations is changed, consolidated financial informations of the prior periods are also reclassified in order to maintain consistency with the current year's presentation in line with the related changes.

a) Standards, amendments and interpretations applicable as at 30 September 2021:

The group evaluated the effects of the standards and changes mentioned below on the financial informations and concluded that the changes made did not have a significant impact on the financial informations.

- Amendment to IFRS 16, 'Leases' Covid-19 related rent concessions Extension of the Practical expedient; as of March 2021, this amendment extended till June 2022 and effective from 1 April 2021. As a result of the coronavirus (COVID-19) pandemic, rent concessions have been granted to lessees. Such concessions might take a variety of forms, including payment holidays and deferral of lease payments. On 28 May 2020, the IASB published an amendment to IFRS 16 that provides an optional practical expedient for lessees from assessing whether a rent concession related to COVID-19 is a lease modification. Lessees can elect to account for such rent concessions in the same way as they would if they were not lease modifications. In many cases, this will result in accounting for the concession as variable lease payments in the period(s) in which the event or condition that triggers the reduced payment occurs.
- Amendments to IFRS 7, IFRS 4 and IFRS 16 Interest Rate Benchmark Reform Phase 2; effective from annual periods beginning on or after 1 January 2021. The Phase 2 amendments address issues that arise from the implementation of the reforms, including the replacement of one benchmark with an alternative one.
- b) Standards, amendments and interpretations that are issued but not effective as at 30 September 2021:
- **IFRS 17, 'Insurance contracts';** effective from annual periods beginning on or after 1 January 2023. This standard replaces IFRS 4, which currently permits a wide variety of practices in accounting for insurance contracts. IFRS 17 will fundamentally change the accounting by all entities that issue insurance contracts and investment contracts with discretionary participation features.

NOTES TO CONSOLIDATED FINANCIAL INFORMATIONS AS AT SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

2. ACCOUNTING POLICIES (Continued)

- 2.4 Changes in accounting policy and disclosures (Continued)
- b) Standards, amendments and interpretations that are issued but not effective as at 30 September 2021 (Continued):
- Amendments to IAS 1, Presentation of financial informations' on classification of liabilities; effective from 1 January 2022. These narrow-scope amendments to IAS 1, 'Presentation of financial informations', clarify that liabilities are classified as either current or non-current, depending on the rights that exist at the end of the reporting period. Classification is unaffected by the expectations of the entity or events after the reporting date (for example, the receipt of a waiver or a breach of covenant). The amendment also clarifies what IAS 1 means when it refers to the 'settlement' of a liability.
- A number of narrow-scope amendments to IFRS 3, IAS 16, IAS 37 and some annual improvements on IFRS 1, IFRS 9, IAS 41 and IFRS 16; effective from Annual periods beginning on or after 1 January 2022.
 - Amendments to IFRS 3, 'Business combinations' update a reference in IFRS 3 to the Conceptual Framework for Financial Reporting without changing the accounting requirements for business combinations.
 - Amendments to IAS 16, 'Property, plant and equipment' prohibit a company from deducting from
 the cost of property, plant and equipment amounts received from selling items produced while the
 company is preparing the asset for its intended use. Instead, a company will recognise such sales
 proceeds and related cost in profit or loss.
 - Amendments to IAS 37, 'Provisions, contingent liabilities and contingent assets' specify which
 costs a company includes when assessing whether a contract will be loss-making.

Annual improvements make minor amendments to IFRS 1, 'First-time Adoption of IFRS', IFRS 9, 'Financial instruments', IAS 41, 'Agriculture' and the Illustrative Examples accompanying IFRS 16, 'Leases'.

- Narrow scope amendments to IAS 1, Practice information 2 and IAS 8; effective from annual periods beginning on or after 1 January 2023. The amendments aim to improve accounting policy disclosures and to help users of the financial informations to distinguish between changes in accounting estimates and changes in accounting policies.
- Amendment to IAS 12 Deferred tax related to assets and liabilities arising from a single transaction; from annual periods beginning on or after 1 January 2023. These amendments require companies to recognise deferred tax on transactions that, on initial recognition give rise to equal amounts of taxable and deductible temporary differences.

2.5 Critical accounting estimates and judgments in applying accounting policies

The preparation of consolidated financial informations requires management to make judgments, estimates and assumptions that affect the application of accounting policies and the reported amounts of assets, liabilities, income and expenses. Actual results may differ from these estimates.

The key assumptions concerning the future and other key sources of estimation uncertainty at the reporting date, that have a significant risk of causing a material adjustment to the carrying amounts of assets and liabilities within the next financial year are discussed below.

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

2. ACCOUNTING POLICIES (Continued)

2.5 Critical accounting estimates and judgments in applying accounting policies (Continued)

Deferred acquisition costs (DAC)

Those direct and indirect costs incurred during the financial period arising from the writing or renewing of insurance contracts, are deferred to the extent that these costs are recoverable out of future premiums. All other acquisition costs are recognised as an expense when incurred.

Deferral periods can be the average life-time of the contracts (which are longer than the lapse assumptions). The Group management reviews the historical lapse development for pension and ROP contracts each period. As of September 30, 2021, the estimated life time of the pension and ROP contracts is defined as seven years and nine years respectively. The amount of DAC is subject to Liability Adequacy Test each year. The Group has applied straight line method for the amortization of DAC in the average-life time of the contacts.

Deferred income reserve (DIR)

IFRS 15 Revenue from Contracts with Customers requires the recognition of revenue over the life time of contracts. The Group applied seven years of amortization in line with DAC.

Ultimate liability arising from claims made under insurance contracts

The estimation of the ultimate liability arising from claims made under insurance contracts is executed depending on different assumptions. Mortality tables (CSO 1953-58, CSO 80 (Male-Female) approved by the Turkish Treasury are used to estimate the ultimate liability arising from life insurance policies. For estimating the risk of critical illness, the Critical Illness Rating Tables which are recommended by leader treaty reinsurer are used.

Estimate of future benefit payments and premiums arising from long-term insurance contracts

For estimation of future benefit and premium payments, four parameters have significant impacts:

- i) The lapse and surrender rates: These estimated rates are derived from past experience. In its estimation, the Group also takes into consideration the economic crisis or positive economic developments that will affect the rates either in a positive or a negative way.
- ii) Number of deaths: While estimating number of deaths in a year, the historical mortality experiences are used.
- iii) Future investment income: This estimate is based on current market returns as well as expectations about future economic and financial developments.
- iv) Average premium per insured: The assumption is based on historical trends in average premium amounts per insured and economical expectations that may affect the average premium amount.

Employee termination benefits

In accordance with existing social legislation in Turkey, the Group is required to make lump-sum termination indemnities to each employee who has completed over one year of service with the Group and whose employment is terminated due to retirement or for reasons other than resignation or misconduct. In calculating the related liability to be recorded in the consolidated financial informations for these termination benefits, the Group makes assumptions and estimations relating to the discount rate to be used, turnover of employees, future change in salaries/limits, etc. These estimations which are disclosed in Note 2.3 and Note 18 are reviewed regularly.

Doubtful receivables provisions

Doubtful receivables provisions are related to the total amount of receivables assessed by the Group's management, to cover the future potential losses arising from the non-collectability of the receivables as of the balance sheet date, upon the current state of the economy. The total amount of the provision is determined according to the valuation results, performances, market credibility, collection performances following balance sheet date, and the restructuring on the receivables. The doubtful receivables provision as of the balance sheet date is disclosed in Note 8.

NOTES TO CONSOLIDATED FINANCIAL INFORMATIONS AS AT SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

2. ACCOUNTING POLICIES (Continued)

2.5 Critical accounting estimates and judgments in applying accounting policies (Continued)

Provision for litigations

In determining the provision for litigations, the Management considers the probability of legal cases to be brought against the Group and in case it is brought against the Group considers its consequences based on the assessments of legal advisor. The Group management makes its best estimates using the available data provided (Note 16).

2.6 Covid-19

General Explanation;

Regarding to Coronavirus (Covid-19) pandemic, Group has taken the necessary actions for the safety of its employees, customers and the society. Group is evaluating the current news related to pandemic, and sharing all the decisions with its employees and customers as soon as possible.

As of August 1, 2021, customer visits/branch visits (for insurance managers) were carried out 5 days a week on a voluntary basis within the framework of current hygienic rules. As part of the practices for normalization, the Company's sales offices were put into use as of September 2021, together with the hygienic rules and the measures required by the Pandemic. In September, sales teams carried out their work in a way to make full-time customer visits / branch visits 5 days a week.

The Group is cautious about the return-to-office plan of the Headquarters teams and acts by taking all precautions. The company decided to pilot the hybrid working model as of October 2021 and planned that all teams come to the office within a certain plan. AgeSA will work in the hybrid working model pilot, with a minimum of 5 days a month from the office and the other days remotely. However, due to the fact that the effects of the pandemic did not decrease at the expected level; The model of working from the office for a minimum of 5 days a month has been implemented in a 50% diluted form on a team basis for the time being.

3. SEGMENT INFORMATION

Information related to the operational reporting made by the Group to the chief operating decision-maker in accordance with the "IFRS 8 - Operating Segments" is disclosed in this note. The Group manages its business through the following business segments:

Life Protection

The Group's life insurance business is principally related to life protection insurance, including credit-linked life and non-credit-linked life policies, such as term life, return of premium, critical illness and unemployment.

- Credit-linked life insurance policies represent the largest group of products historically offered by the Group, both in terms of the number of valid insurance policies and by share of the gross written premiums in the total gross written premiums earned by the Group. The Group offers both long-term and short-term credit-linked life insurance. Long-term credit-linked life insurance includes insurance policies relating to mortgages or consumer loans for terms greater than one year. Short-term credit-linked life insurance includes yearly renewable insurance policies relating to consumer loans with accidental disability and optional unemployment covers check credit life and SME credit life.
- Non-credit-linked (term) life insurance policies provide life protection insurance for a certain period of time. The insurance covers the insuree's life. In the event of death, the beneficiary receives the amount insured. Individual protection insurance may be entered into only with regular premium installments in amounts pre-determined for the entire contract period. The Group offers customizable life insurance riders including involuntary unemployment, critical illness, accidental death, and disability due to accident or sickness in its non-credit-linked product portfolio.

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

3. SEGMENT INFORMATION (Continued)

Life Savings

Life savings products are generally written for a contract period, during which the insured makes regular premium payments into a unit, in return for a unit-price guaranteed.

Personal Accident

Personal accident policies provide coverage against disability, death and medical expenses due to accident. The insurance covers the insuree's life. In the event of a defined accident, the beneficiary receives the amount insured. Individual protection insurance may be entered into with a single premium or with regular premium installments in amounts pre-determined for the entire contract period.

Pension

The Group offers a number of individual and corporate pension plans within the framework of the private pension system in Turkey.

The segment information below is presented on the basis used by the chief operating decision-maker to evaluate performance. Premium production and technical profit are considered while determining operating segments. Technical profit is the profit that the Group derives from providing insurance coverage, exclusive of the income it derives from investments. The chief operating decision-maker reviews discrete financial information for each of its segments, including measures of operating results. The segments are managed primarily on the basis of their results, which are measured on a basis which is broadly consistent with the Summary of Significant Accounting Policies described in Note 2, with the exception of certain adjustments. Management considers that this information provides the most appropriate way of reviewing the performance of the business.

Since the Group operates principally in Turkey, geographic segment information is not presented.

Commission expenses: Represents commission expenses included in general and administrative expenses in the information of profit or loss under IFRS which are attributable to life protection, life savings, pension and personal accident segments.

Net change in mathematical reserves: Net change in mathematical reserves are a component of net premiums earned as per the Group's segment reporting; whereas this is presented as part of total income after net premiums earned in the information of profit or loss under IFRS.

Other: Adjustments included in other represent individually insignificant reclassifications.

Transactions between the business segments are on normal commercial terms and conditions.

Below are the reconciliations of the information of profit or loss:

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021 (Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

SEGMENT INFORMATION (Continued) 3.

		Life Insur	ance			R	Reconciliation to	information of profit and lo	ss
•				Personal		Commissions		Net change in	Information of
January 1 - September 30, 2021	Pension	Life protection	Life savings	accident	Total	expenses	Other	mathematical reserves	profit or loss
Gross written premiums	_	1,348,401,662	6,552,524	43,335,978	1,398,290,164	_	_	_	1,398,290,164
Premium ceded to reinsurers	-	(19,678,716)	(420,427)	(188,632)	(20,287,775)	-	-	_	(20,287,775)
Premium written net of reinsurance	-	1,328,722,946	6,132,097	43,147,346	1,378,002,389	-	-	-	1,378,002,389
Net change in mathematical reserves	-	(542,633,889)	48,051,882	_	(494,582,007)	_	_	(494,582,007)	_
Net change in provision for unearned premiums reserves	_	(12,684,633)	3,828	2,262,509	(10,418,296)	_	_	-	(10,418,296)
Net premiums earned	-	773,404,424	54,187,807	45,409,855	873,002,086	-	-	(494,582,007)	1,367,584,093
Net change in mathematical reserves	-							494,582,007	(494,582,007)
Claim paid and change in outstanding claims		(106,226,542)	(51,605,067)	(1,761,880)	(159,593,489)			454,562,007	(159,593,489)
Commission income		7.084.405	23,214	210,395	7,318,014				7,318,014
Commission expense		(234,545,351)	25,214	(23,679,409)	(258,224,760)	(1,005,000)			(257,219,760)
Commission expense		(271,368,651)		(23,679,409)	(295,048,060)	(1,005,000)			(294,043,060)
DAC		36,823,300		(23,077,407)	36,823,300	(1,005,000)			36,823,300
Other income / (expense), net		117,703,919	-	1,313,799	119,017,718	_	(1,598,311)	_	120,616,029
Life and personal accident technical profit	_	557,420,855	2,605,954	21,492,760	581,519,569		(1,0>0,011)		120,010,02>
		, , , , , , , , , , , , , , , , , , , ,	,,	, , , , , , , , , , , , , , , , , , , ,	7 ,				
Fund management charge	288,316,396	-	-	-	288,316,396	-	-	-	288,316,396
Management fee	8,644	-	-	-	8,644	-	-	-	8,644
Account management fee, net of DIR	70,006,271	-	-	-	70,006,271	-	-	-	70,006,271
Account management fee	64,898,128	-	-	-	64,898,128	-	-	-	64,898,128
DIR	5,108,143	-	-	-	5,108,143	-	-	-	5,108,143
Premium holiday charges	6,210	-	-	-	6,210	-	-	_	6,210
Deferred fee	16,222,335	-	-	-	16,222,335	-	-	-	16,222,335
Pension income	374,559,856	-	-	-	374,559,856	-	-	-	374,559,856
Fund management charge	(32,271,189)			_	(32,271,189)	_	_	_	(32,271,189)
Commission expense, net of DAC	(85,021,661)				(85,021,661)	(630,617)			(84,391,044)
Commission expense	(104,599,024)				(104,599,024)	(630,617)			(103,968,407)
DAC	19,577,363				19,577,363	(030,017)			19,577,363
Other income / (expense), net	(20,574,330)				(20,574,330)			_	(20,574,330)
Pension expenses including commission	(137,867,180)	_	_	_	(137,867,180)	(630,617)	_	-	(137,236,563)
	· / /				` ' '	(/////////			(-)))
Pension technical profit	236,692,676	-	-	-	236,692,676				
Total technical profit	236,692,676	557,420,855	2,605,954	21,492,760	818,212,245				
General and administrative expenses					(414,652,863)				
Net technical profit after overhead expenses	236,692,676	557,420,855	2,605,954	21,492,760	403,559,382				
Net technical profit after overnead expenses	230,092,070	337,420,033	2,003,934	21,492,700	403,339,362				
Foreign exchange gain/(loss), net					17.136.186				
Investment and other income/(expense), net					108,294,558				
Net financial income					125,430,744				
Profit before taxes					528,990,126				
TOTAL DELOTE MACS					340,770,140				
Income tax expense					(134,596,789)				
Profit for the period					394,393,337				

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021 (Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

SEGMENT INFORMATION (Continued) 3.

	Life Insurance				Reconciliation to information of profit and loss				
January 1 - September 30, 2020	Pension	Life protection	Life savings	Personal accident	Total	Commissions expenses	Other	Net change in mathematical reserves	Information of profit or loss
sandary 1 - September 50, 2020	rension	Enc protection	Life savings	accident	10111	capenses	Other	mathematical reserves	profit or loss
Gross written premiums	-	925,431,259	6,697,304	51,130,761	983,259,324				983,259,324
Premium ceded to reinsurers	-	(11,094,969)	(408,045)	(2,022,287)	(13,525,301)				(13,525,301)
Premium written net of reinsurance	-	914,336,290	6,289,259	49,108,474	969,734,023	-	-	-	969,734,023
AT a late of the state of the s	-	(200 754 116)	27 (51 022		(252 102 104)			(252 102 194)	
Net change in mathematical reserves		(390,754,116)	37,651,932 13,173	5 049 221	(353,102,184)	-	-	(353,102,184)	10 522 792
Net change in provision for unearned premiums reserves	-	14,462,278		5,048,331	19,523,782	-	-	(252 102 104)	19,523,782
Net premiums earned	-	538,044,452	43,954,364	54,156,805	636,155,621	-	-	(353,102,184)	989,257,805
Net change in mathematical reserves	-							353,102,184	(353,102,184)
Claim paid and change in outstanding claims		(117,355,410)	(40,893,274)	(2,062,822)	(160,311,506)	-	-	333,102,184	(160,311,506)
Commission income		5,440,832	249,673	1,699,923	7,390,428	-	-	-	7,390,428
Commission expense		(131,152,277)	249,073	(28,242,463)	(159,394,740)	(1,454,167)	-	-	(157,940,573)
	-	(151,132,277)	-				-	-	(185,713,326)
Commission expense DAC	-	27,772,753	-	(28,242,463)	(187,167,493) 27,772,753	(1,454,167)	-	-	27,772,753
	-	47,268,186	-	526,823	47,795,009		(106.957)	-	47,991,866
Other income / (expense), net	-		2 210 7/2	26,078,266	371.634.812	-	(196,857)	-	47,991,866
Life and personal accident technical profit	-	342,245,783	3,310,763	26,078,266	3/1,634,812				
Frank management charge	243,340,161				243,340,161				243,340,161
Fund management charge	1.955.426	-	-	-	1.955.426	-	-	-	1,955,426
Management fee		-	-	-		-	-	-	
Account management fee, net of DIR	66,164,940	-	-	-	66,164,940	-	-	-	66,164,940
Account management fee	57,312,199	-	-	-	57,312,199	-	-	-	57,312,199
DIR	8,852,741	-	-	-	8,852,741	-	-	-	8,852,741
Premium holiday charges	453,823	-	-	-	453,823	-	-	-	453,823
Deferred fee	18,856,045	-	-	-	18,856,045	-	-	-	18,856,045
Pension income	330,770,395	-	-	-	330,770,395	-	-	-	330,770,395
	(26.461.027)				(0.6.461.027)				(0.6, 4.61, 0.27)
Fund management charge	(26,461,937)	-	-	-	(26,461,937)	-	-	-	(26,461,937)
Commission expense, net of DAC	(84,062,766)	-	-	-	(84,062,766)	(3,506,477)	-	-	(80,556,289)
Commission expense	(85,208,475)	-	-	-	(85,208,475)	(3,506,477)	-	-	(81,701,998)
DAC	1,145,709	-	-	-	1,145,709	-	-	-	1,145,709
Other income / (expense), net	(15,577,731)	-	-	-	(15,577,731)	-	-		(15,577,731)
Pension expenses including commission	(126,102,434)	-	-	-	(126,102,434)	(3,506,477)	-	-	(122,595,957)
D	204 667 061				204 ((7.0(1				
Pension technical profit	204,667,961	-	-	-	204,667,961				
Total technical profit	204,667,961	342,245,783	3,310,763	26,078,266	576,302,773				_
•	<u> </u>		<i>'</i>						
General and administrative expenses					(298,104,828)				
Net technical profit after overhead expenses	204,667,961	342,245,783	3,310,763	26,078,266	278,197,945				
Foreign exchange gain/(loss), net					33,428,720				
Investment and other income/(expense), net					28,782,262				
Net financial income					62,210,982				
Profit before taxes					340,408,927				
Income tax expense					(76,356,058)				
Profit for the period					264,052,869				
1 tont for the period					407,034,003				

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

4. INSURANCE AND FINANCIAL RISK MANAGEMENT

The Group has developed and implemented a risk management structure to protect it against events that undermine sustainable performance, solvency or the achievement of strategic objectives. The risk management system is a fundamental part of the daily operations and ongoing performance of the Group. By identifying, analyzing, measuring, controlling, managing, reporting and mitigating risks that may arise in the course of its operations in a timely manner, the Group intends to, among other things, comply with applicable legislative and regulatory requirements, meet its obligations towards its customers and counterparties and maintain capital adequacy.

The Group's approach to risk management is based on the following elements:

- Ensuring compliance with legal obligations and the Group's risk management policies;
- Identifying all structural risks the Group is exposed to and defining risk acceptance criteria; and;
- Designing and applying internal control mechanisms and actions to seek to address these risks, and assuring the Board of Directors about the transparent reporting of such risks.

The Board of Directors has overall responsibility for the risk and control environment, including setting the Group's risk appetite, risk strategy and target operating model, and risk management and internal control systems.

Early Risk Detection Committee

Pursuant to the Regulation on Internal Systems and a resolution of AgeSA's Board of Directors dated July 15, 2011 and numbered 2011/29, AgeSA established a risk committee. Subsequently, pursuant to a resolution of AgeSA's Board of Directors dated October 17, 2014 and numbered 2014/62, the risk committee was restructured to replace the former risk committee in compliance with the Corporate Governance Principles (the Early Risk Detection Committee). Pursuant to the Corporate Governance Communique, an early risk detection committee is to be responsible for the preliminary detection of risks that may endanger the existence, development and continuity of a public company. Such committee is also responsible for supervising the implementation of appropriate remedial measures and the performance of risk management activities, during the course of which it must monitor, at least once a year, the risk management systems of the Group.

Risk Management Framework

The Group aims to maximize Market Consistent Embedded Value (MCEV) and Shareholders' expectations within the risk appetite framework. It is provided by consistent and strong risk management process are applied companywide.

AgeSA Hayat ve Emeklilik Anonim Şirketi's risk management framework "(RMF)" forms an integral part of the management and Board processes and decision making framework. The key elements of our risk management framework comprise risk appetite, risk governance including risk policies and business standards, risk oversight committees and roles and responsibilities and the processes we use to identify, measure, manage, monitor and report "(IMMMR)" risks.

Roles and responsibilities for risk management are based around the "three lines of defence model" where ownership for risk is taken at all levels in the Group.

- First line of defence (Management): Primary responsibility for risk identification, measurement, management, monitory and reporting lies with management. The first-line management is responsible for the implementation and practice of risk management, as well as establishing internal control systems.
- Second line of defence (Risk and Internal Control Function): Risk and Internal Control function is accountable for oversight and challenge of the IMMMR process and for developing the risk management framework.
- Third line of defence (Internal audit function): Internal Audit function provides an independent assessment of the risk framework and internal control processes.

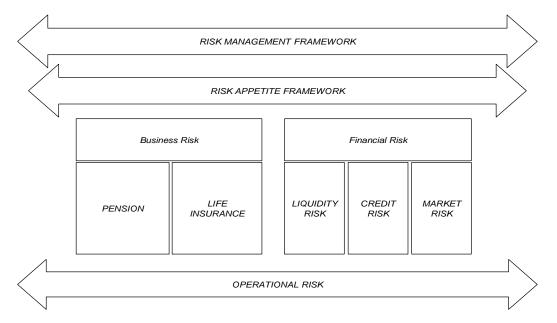
NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

4. INSURANCE AND FINANCIAL RISK MANAGEMENT (Continued)

The Group's risk management model identifies risk classes, which are then further highlighted under risk management policies and standards. These risk management policies and standards act as practical guides explaining how the Group can manage any financial, operational and nominal losses in the most appropriate way, by identifying the risks inherent in the life insurance and private pension industry, analyzing measurable data concerning these risks and establishing limits for such risks for the Group and its management.

The following diagram sets out the Group's risk policy framework:



The Group also adheres to the following business policies and standards as regards risk management:

Risk policies

The risk management policies set the basic principles and standards for the risk management system and processes. The policies are approved by the Board of Directors and the amendments require the Board of Directors approval. The tools required to determine, measure, manage, monitor and report the risk vary by the risk type. Therefore, the risk policy framework includes six risk policies, including the Risk Management Framework Policy, special to each risk type to which the Group is exposed: life insurance and private pension, credit, market, liquidity and operational risk.

Business standards

The Group recognizes the importance of consistent and controlled business processes as a form of risk management. Each risk policy is therefore supported by a number of associated business standards which sets out the requirements for operating consistent processes across its most important business activities.

Primary risks facing the Group are Insurance Risk and Financial Risk (comprising mainly Market Risk and Credit Risk).

Insurance Risk

This is the risk that the insurance premiums allocated by the Group may not meet the claim liabilities and profit share payments and any payment in relation to claims and damages may exceed its expectations. Life insurance risk includes, death, disability, additional collateral due to accidents and dangerous diseases etc.

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

4. INSURANCE AND FINANCIAL RISK MANAGEMENT (Continued)

Insurance Risk (Continued)

a) Life insurance

Life insurances are offered as individual and group contracts in short and long term periods. Mortality risk (the risk that more than expected insured parties die), disability, critical illness and additional collateral play an important role in the life insurance businesses of the Group. The all risk associated with the Group's life insurance mentioned above and related rider businesses have been partly reinsured.

The life insurance businesses are also exposed to lapse risk and persistency risk. Lapse risk is the risk that policies exit prior the maturity. Persistency risk is defined as the risk of a sustained increase in lapse rates, unexpected volatility in lapse rates and mass lapses. Whether policyholders terminate or renew (explicitly or through automatic renewal) their insurance policies depends on consumer expectations and developments in the financial markets. Managing the attractiveness of life insurance products for customers and intermediaries as well as close monitoring of developments in the portfolio are key to mitigating this risk.

In case of technical interest rates remain below the guaranteed return on investment returns on life insurance will be taken of the cumulative premium investment risk is the risk of the insurance company is concerned.

b) Personal accident (Non-Life)

Personal Accident insurances are offered as individual or group contracts. Personal accident insurance contains the risk like accidental death and accidental disability. Disposals and customer retention risks are also among the risk of personal accident insurance. The personal accident insurance as well as life insurance should be given as additional collateral to guarantee unemployment insurance, reinsurance collateral is transferred to all.

c) Pensions

The pensions business is also exposed to lapse risk, which is the risk of cancelling contracts, transfers out to competitors and termination of pension policies at maturity (*i.e.*, retirement). The investment risk under pension contracts is borne by the customer. The customer evaluates its pension fund investments according to its own preferences.

Assessment and claims settlement

In order to assess insurance risk, and accordingly manage the claim and premium balance, determine liabilities accurately and ensure sufficient provisioning to meet liabilities, the Group performs the following analyses:

- experience investigations on claims;
- persistency reports on lapses and transfer outs; and
- Market-Consistent Embedded Value ("MCEV")

Claims handling is organized in a specialized department within the operations division of the Group, handling both individual and corporate policies, and the assessment and settlement of incurred claims takes place on a monthly basis.

Insurance Risk Management

The purpose in managing risks arising from insurance contracts and policies designed to reduce such risks:

The insurance risk is a risk transferred by insured to insurer, apart from financial risk. Transferred risk is about an uncertain future incident. Uncertainty arises from lack of information about whether the incident is going to happen or not or about its size or timing.

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

4. INSURANCE AND FINANCIAL RISK MANAGEMENT (Continued)

Insurance Risk Management (Continued)

The ratio of premiums collected by insurer to claim paid to insured denotes a Company's capacity to meet insurance risk.

As at September 30, 2021 and December 31, 2020, Company's claim/premium ratio related branches are given below. It is observed that premiums collected provide a capacity to meet any incurred claims:

Net claim/premium ratio	September 30, 2021	December 31, 2020
Life	13%	28%
Personal Accident (Casualty)	3%	3%

As at September 30, 2021 and December 31, 2020 that part of total risk which is ceded to reinsurers is given below on a risk coverage basis.

September	30, 2021							
Life Natural death	Accidental Death	Accidental disability	Sickness disability	Dangerous Sickness	Public Transport	Unemployment	Accidental Treatment Cost	
7.55%	11.72%	2.26%	2.06%	54.29%	8.08%	100.00%	16.18%	
Personal A Accidental		Accidental di	isability	A	ccidental trea	tment cost	Unemployment	
0.45%		0.71%		0.	07%		100.00%	
December :	31, 2020							
Life Natural death	Accidental Death	Accidental disability	Sickness disability	Dangerous Sickness	Public Transport	Unemployment	Accidental Treatment Cost	
7.66%	15.41%	3.18%	2.89%	54.79%	15.18%	100.00%	1.10%	
Personal A	ccident							
Accidental 7.00%	death	Accidental di 11.50%	sability		ccidental treat	tment cost	Unemployment 100.00%	

Sensitivity to Insurance Risk

The Group's policy production strategy is based on optimal distribution of risk to reinsurance companies according to policy type, as well as to kind and size of risk taken. At September 30, 2021 and December 31, 2020 the Group has both proportional and non-proportional reinsurance treaties.

Outstanding claims are reviewed and updated periodically by claims department.

The Group executes insurance contracts in life insurance and personal accident branches. Accordingly, in such insurance contracts, insurance risk concentration according to nature of the subject-matter of insurance are summarized below in gross and net figures (net of reinsurance):

September 30, 2021	Total gross risk liability	Share of reinsurer in total risk liability	Net risk liability
		•	•
Life	84,659,072,094	(6,393,556,887)	78,265,515,207
Personal Accident	25,919,547,536	(147,685,421)	25,771,862,115
	===		
Total	110,578,619,630	(6,541,242,308)	104,037,377,322
		Share of reinsurer	
December 31, 2020	Total gross risk liability	in total risk liability	Net risk liability
Life	64,035,368,614	(4,907,509,190)	59,127,859,424
Personal Accident	28,358,639,571	(2,562,790,806)	25,795,848,765
Total	92.394.008.185	(7.470.299.996)	84.923.708.189

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

4. INSURANCE AND FINANCIAL RISK MANAGEMENT (Continued)

Sensitivity to Insurance Risk (Continued)

The Group's gross provision for outstanding claims at September 30, 2021 and December 31, 2020 are as follows:

Outstanding Claims	September 30, 2021	December 31, 2020
Life	98,638,205	79,262,316
Personal Accident	7,013,212	7,572,909
Total	105,651,417	86,835,225

Financial Risk

Financial risk arises from the financial instruments used by the Group, such as cash, time bank deposits, government bonds, treasury bills, private sector bonds and Eurobonds. The specific risks arising from such instruments and insurance contract liabilities are as follows:

a) Market Risk

Market risk refers to the risk of incurring financial losses as a result of fluctuations in the fair value of a financial instrument or expected future cash flows from a financial instrument and the risk that fair value of cash flows resulting from liabilities (including insurance liabilities) will change due to fluctuations in the level or the volatility of market variables. Market risk consists of equity risk, inflation risk, property risk, commodity risk and, more importantly for the Group, interest rate risk and foreign exchange risk.

i) Foreign Currency Risk

The Group is exposed to foreign exchange risk through the impact of rate changes at the translation of Turkish Lira pertaining to foreign currency denominated receivables and payables.

Foreign currency sensitivity analysis as of September 30, 2021 and December 31, 2020 are as follows:

At September 30, 2021, on condition that all variables remain constant, effect of a 20% appreciation/devaluation of Eurobonds against TL on owners' equity is TL 2,665,994/ (2,665,994). As at September 30, 2020, on condition that all variables remain constant, effect of a 20% appreciation/devaluation of Eurobonds against TL on owners' equity is TL 8,804,870 / (8,804,870).

September 30, 2021:

Liabilities and assets in foreign currency	Effect		
Exchange rate variation (*)	USD (*) EUR (*)		GBP (*)
20% (20%)	12,996,910 (12,996,910)	748,690 (748,690)	19,400 (19,400)

September 30, 2020:

Liabilities and assets in foreign currency	Effect o		
Exchange rate variation (*)	USD (*)	EUR (*)	GBP (*)
20%	14,004,330	(467,532)	13,872
(20%)	(14,004,330)	467,532	(13,872)

(*) All amounts are presented in TL.

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

4. INSURANCE AND FINANCIAL RISK MANAGEMENT (Continued)

Financial Risk (Continued)

a) Market Risk (Continued)

ii) Interest Risk

The Group's sensitivity to interest rate risk is related to the change in the fair values or expected cash inflows of the financial assets due to the fluctuations in the interest rates. The Group closely monitors interest rate risk by monitoring market conditions and appropriate valuation methods.

In the following table, on condition that all other variables remain constant, it is disclosed that the effect of 100 base points and 500 base points increase / decrease in market interest rates on securities. The underlying logic used in this projection; by using of upward and downward changes in the weighted average interest rates of securities in the market, calculating how much the present value of future cash flows can be affected by amount. In the related calculation, the methods valid in the market for interest sensitivity are used.

The company implements stress tests and scenarios for interest rate risk in routine basis and creates an action plan by considering these studies while determining the distribution of strategic assets.

As at September 30, 2021:

Total of trading and available for sale financial assets	Effect			
Market interest increase / (decrease) (**)	TL	USD (*)	EUR (*)	
5%	(35,666,389)	(25,736,924)	(19,197)	
(5%)	35,666,389	25,736,924	19,197	
1%	(7,133,278)	(51,473,848)	(38,394)	
(1%)	7,133,278	51,473,848	38,394	

^(*) Amounts are presented in TL.

As at September 30, 2020 :

Total of trading and available for sale financial assets	Effect Profit and Loss					
Market interest increase / (decrease) (**)	TL	USD (*)	EUR (*)			
5%	(51,614,337)	(28,204,570)	(19,187)			
(5%)	51,614,337	28,204,570	19,187			
1%	(10,328,654)	(56,409,141)	(38,374)			
(1%)	10,328,654	56,409,141	38,374			

^(*) Amounts are presented in TL.

b) Credit Risk

Credit risk is the failure of Group to third parties not to fulfill their obligations wholly or partially, financial loss related to changes in credit spreads and credit note.

Since, financial assets of the Group mainly consist of government bonds which are not considered as a high credit risk and bank deposits in the banks resident in Turkey, credit risk is lower than other risk categories.

^(**) Interest risk computed according to a 0.5% variation in interest rates for USD and EUR portfolio.

^(**) Interest risk computed according to a 0.5% variation in interest rates for USD and EUR portfolio.

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

4. INSURANCE AND FINANCIAL RISK MANAGEMENT (Continued)

b) Credit Risk (Continued)

Maximum exposure to credit risk

The table below shows the maximum exposure to credit risk for the components of the consolidated financial informations:

	September 30, 2021	December 31, 2020	
Financial assets	3,178,392,029	2,229,963,493	
Cash and cash equivalents	1,089,236,757	994,041,049	
Pension business receivables	211,888,212	197,580,785	
Premium and other insurance receivables	36,117,695	35,330,094	
Reinsurance share of insurance liabilities	24,657,540	10,949,619	
Other financial assets	897,700	868,012	
Total	4,541,189,933	3,468,733,052	

c) Liquidity Risk

The Group faces the risk that its short-term assets are insufficient to meet its short-term obligations (such as claims arising from insurance contracts) as they fall due. To mitigate this risk, it uses liquidity coverage ratio "(LCR)" to monitor its liquidity risk profile on a 12-month basis. The monthly LCR is defined as (i) the projected amount of cash available at the start of the month divided by (ii) the planned net cash outflows during the month plus an allowance for a 1 in 10 stress event.

Liquidity risk refers to the risk that the Company's short-term liabilities, such as losses arising from insurance contracts, cannot be supplied by the short-term resources it holds. The company estimates the Liquidity Coverage Ratio (LCR) to monitor the liquidity risk and execute stress tests.

The company develops and monitors strategies, policies and procedures to ensure that liquidity risk is effectively managed in line with the liquidity risk appetite and that sufficient liquidity is maintained continuously, due to the worldwide coronavirus (COVID-19) outbreak.

As of 30 September 2021, the Company's non-discounted commercial debts and the maturities of financial debts are as follows, and there is no liquidity risk at present and for the future periods.

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

4. INSURANCE AND FINANCIAL RISK MANAGEMENT (Continued)

c) Liquidity Risk (Continued)

As at September 30, 2021, table of liquidity risk is as follows:

The following tables detail the Group's remaining contractual maturity for its non-derivative financial assets and liabilities. The tables have been drawn up based on the undiscounted cash flows of financial assets and liabilities based on the earliest date on which the Group can be required to pay. The table includes both interest and principal cash flows. The undiscounted totals column includes the effect of the possible future cash flows attributable to the instrument included in the maturity analysis which are not included in the carrying amount of the financial liability on the information of financial position.

September 30, 2021	Carrying amount	Up to 1 month	1-3 months	3 months to 1 year	1-5 years	5 years and over	No maturity date	Undiscounted Totals
September 30, 2021	amount	Op to 1 month	1-3 months	1 year	1-5 years	and over	uate	Totals
Financial assets								
Cash and cash equivalents	1,089,236,757	121,091,974	493,290,336	511,740,836	-	-	-	1,126,123,146
Financial assets	3,178,392,029	13,725,399	43,282,813	174,542,645	512,818,726	2,349,312,735	44,169,176	3,137,851,494
- Available for sale financial investments	213,520,687	13,725,399	38,432,992	18,355,488	110,212,903	37,643,727	· · · · -	218,370,509
- Financial assets at fair value through								
profit or loss	289,042,718	-	4,849,821	19,915,232	195,232,457	21,108,940	44,169,176	285,275,626
-Available for sale asset backing financial								
investments, Policyholders' portfolio	2,675,828,624	_	-	136,271,925	207,373,366	2,290,560,068	-	2,634,205,359
Premium and other insurance receivables	36,117,695	_	28,490,100	7,616,234	11,361	-	-	36,117,695
Pension business receivables	211,888,212	40,829,640	10,549,314	32,129,592	113,383,671	14,995,995	-	211,888,212
Other financial assets	897,700	<u> </u>	<u> </u>			<u> </u>	897,700	897,700
Total	4,516,532,393	175,647,013	575,612,563	726,029,307	626,213,758	2,364,308,730	45,066,876	4,512,878,247
Financial liabilities								
Lease liabilities	(18,036,496)	_	(2,347,986)	(6,994,704)	(8,693,806)	_	-	(18,036,496)
Due to insurance and reinsurance companies	(64,004,752)	_	(64,004,752)	-	-	_	-	(64,004,752)
Pension business payables	(529,052,438)	(317,245,331)	(13,114,316)	(39,941,710)	(140,952,232)	(17,798,849)	-	(529,052,438)
Other payables and liabilities	(121,629,610)	(52,519,197)	(4,610,186)	(57,396,122)	(7,104,105)	<u> </u>	-	(121,629,610)
Total	(732,723,296)	(369,764,528)	(84,077,240)	(104,332,536)	(156,750,143)	(17,798,849)	-	(732,723,296)
Liquidity surplus/(deficit)	3,783,809,097	(194,117,515)	491,535,323	621,696,771	469,463,615	2,346,509,881	45,066,876	3,780,154,951

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

4. INSURANCE AND FINANCIAL RISK MANAGEMENT (Continued)

c) Liquidity Risk (Continued)

As at December 31, 2020, table of liquidity risk is as follows:

				3 months to		5 years	No maturity	
December 31, 2020	Carrying amount	Up to 1 month	1-3 months	1 year	1-5 years	and over	date	Undiscounted Totals
Financial assets								
Cash and cash equivalents	994,041,049	27,317,694	831,476,362	142,227,683	-	-	-	1,001,021,739
Financial assets	2,229,963,493	-	4,056,317	41,312,797	602,868,768	1,472,847,136	23,232,675	2,144,317,693
- Available for sale financial investments	112,389,182	-	4,056,317	41,312,797	17,591,609	13,340,533		76,301,256
- Financial assets at fair value through profit or loss	241,385,756	-	-	-	193,260,508	11,974,758	23,232,675	228,467,941
- Available for sale asset backing financial								
investments, Policyholders' portfolio	1,876,188,555	-	<u>-</u>		392,016,651	1,447,531,845	-	1,839,548,496
Premium and other insurance receivables	35,330,094	-	26,961,028	7,755,185	613,881	-	-	35,330,094
Pension business receivables	197,580,785	27,539,314	10,542,041	31,333,710	118,221,433	9,944,287	-	197,580,785
Other financial assets	868,012	-	-	-	-	-	868,012	868,012
Total	3,457,783,433	54,857,008	873,035,748	222,629,375	721,704,082	1,482,791,423	24,100,687	3,379,118,323
Financial liabilities								
Lease liabilities	(30,342,375)	_	(1,995,835)	(4,944,082)	(17,956,423)	(5,446,035)	_	(30,342,375)
Due to insurance and reinsurance companies	(32,213,493)	(486,380)	(31,727,113)	-	-	-	_	(32,213,493)
Pension business payables	(520,044,530)	(304,074,321)	(13,389,479)	(39,797,044)	(150,153,415)	(12,630,271)	_	(520,044,530)
Other payables and liabilities	(128,998,804)	(108,887,568)	(11,829,369)	-	(8,281,867)	-	-	(128,998,804)
Total	(711,599,202)	(413,448,269)	(58,941,796)	(44,741,126)	(176,391,705)	(18,076,306)	-	(711,599,202)
Liquidity surplus/(deficit)	2,746,184,231	(358,591,261)	814,093,952	177,888,249	545,312,377	1,464,715,117	24,100,687	2,667,519,121

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

4. INSURANCE AND FINANCIAL RISK MANAGEMENT (Continued)

c) Liquidity Risk (Continued)

Fair value of the financial instruments

Fair value is the amount for which an asset could be exchanged or a liability settled between knowledgeable, willing parties in an arm's length transaction in accordance with market conditions.

The Group determines the estimated fair value of its financial instruments by using the current market information and appropriate valuation methods. Additionally, ability to estimate the market values through assessing the market information requires interpretation and judgment. As a result, the estimations presented herein cannot be an indicator of the amounts obtained by the Group in a current market transaction.

Fair value hierarchy

Fair value is the amount at which a financial instrument could be exchanged in a current transaction between willing parties, other than in a forced sale or liquidation, and is best evidenced by a quoted market price, if one exists. Fair value measurements are performed in accordance with the following fair value measurement hierarchy.

- Level 1: Quoted prices (unadjusted) in active markets for identical assets or liabilities.
- Level 2: Inputs other than quoted prices included within Level 1 that are observable for the asset or liability, either directly (that is, as prices) or indirectly (that is, derived from prices).
- Level 3: Inputs for the asset or liability that is not based on observable market data (that is, unobservable inputs).

	September 30, 2021				
	Level 1	Level 2	Level 3	Total	
Financial assets:					
Available for sale financial assets (Note 6)	213,520,687	-	_	213,520,687	
Financial assets held for trading (Note 6)	289,042,718	-	_	289,042,718	
Financial investments with risks on company as					
held to maturity (Note 6)	1,913,773,334	-	-	1,913,773,334	
Financial investments with risks on policyholders classified					
as available for sale (Note 6) (*)	759,542,383	-	-	759,542,383	
Total financial assets	3,175,879,122	-		3,175,879,122	

(*) Time deposits amounting to TL 2,512,907 are not included. Carrying values of time deposits approximate their fair values due to their short term nature.

	December 31, 2020			
	Level 1	Level 2	Level 3	Total
Financial assets:				
Available for sale financial assets (Note 6)	112,389,182			112,389,182
` '		-	-	, ,
Financial assets held for trading (Note 6)	241,385,756	-	-	241,385,756
Financial investments with risks on company as				
held to maturity (Note 6)	1,063,932,883	-	-	1,063,932,883
Financial investments with risks on policyholders classified				
as available for sale and held to maturity (Note 6) (*)	809,537,852	-	-	809,537,852
Total financial assets	2,227,245,673	-	-	2,227,245,673

^(*) Time deposits amounting to TL 2,717,820 are not included. Carrying values of time deposits approximate their fair values due to their short term nature.

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

4. INSURANCE AND FINANCIAL RISK MANAGEMENT (Continued)

d) Operational Risk

Operational risks consist of all other risks that may cause financial loss or loss of reputation to the Group and may result from the potential failure of the people, processes and technology employed in taking and managing risks. Operational risks that Company faces include the following:

- Regulatory reporting defects regarding pension and life;
- Defects due to incapability of the IT infrastructure; and
- Deficiencies in internal control systems.

The Group regards tight control over its IT systems as a strategic necessity. The Group aims to strengthen its central IT organization and the strategic information management function to increase the effectiveness of the general IT controls and to reduce costs through, for example, the improvement of existing IT systems. The IT systems require many ongoing adjustments because of legislative changes and chain integration.

Operational risks are detailed in the Group's risk tracking system, called OPERA, which is updated to reflect changes in the operating environment and its business processes.

Capital Management

In accordance with the regulations on capital requirements within the framework of the "Regulation on Measurement and Evaluation of Capital Requirements of Insurance and Reinsurance and Pension Companies" published in the Official Gazette dated 23 August 2015 no. 29454 of the SEDDK, the purpose of the Company's capital management is to create and maintain a strong capital structure to sustain the operations of the Company and to maximize the value it provides to the Company's partners.

As of June 30, 2021 and December 31, 2020, the Company has a sufficient amount of equity for losses which may arise from current liabilities and potential risks of the Company. As of June 30, 2021 and December 31, 2020, the required capital reserves (calculated in accordance with the above-mentioned local regulation) and current capital adequacy analysis is as follows:

	June 30, 2021	December 31, 2020
Total shareholders' equity in the statutory		
financial informations (*)	759,942,775	722,469,731
Required minimum capital reserves	431,383,826	369,206,991
Capital surplus	328,558,949	353,262,740

^(*) Capital adequacy amount is calculated based on the stand-alone Financial Statements results. Calculations are made only at the end of December and June and are not updated in other periods.

In accordance with the regulations on capital requirements within the framework of the "Regulation on Measurement and Evaluation of Capital Requirements of Insurance and Reinsurance and Pension Companies" published in the Official Gazette dated 23 August 2015 no. 29454 of SEDDK, the purpose of the Company's capital management is to create and maintain a strong capital structure to sustain the operations of the Company and to maximize the value it provides to the Company's partners.

The company has a strong capital structure with a long-term sustainable profitability target. In this period, with frequent market fluctuations, the Company's capital adequacy ratio is also closely monitored and regularly subjected to stress tests.

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

5. CASH AND CASH EQUIVALENTS

As at September 30, 2021 and December 31, 2020, cash and cash equivalents are as follows:

	September 30, 2021	December 31, 2020	September 30, 2020
Banks	739,246,942	665,739,196	453,937,444
Other cash and cash equivalents (**)	350,472.186	328.470.720	304,673,580
Cheques given and payment orders	(482,371)	(168,867)	(249,732)
	` , ,		758,361,292
Total cash and cash equivalents	1,089,236,757	994,041,049	
			(59,733,078)
Blockage amount (*)	(161,750,691)	(147,266,248)	
Accrued interest	(4,279,351)	(1,657,313)	(1,921,392)
Time deposits more than 3 months	(81,000,000)	(142,018,063)	-
Total cash and cash equivalents per			696,706,822
information of cash flow	842,206,715	703,099,425	

^(*) Note 32 presents the details about the blockage on bank accounts in favour of SEDDK.

Interest rates of time deposits are stated below:

	September 30, 2021	December 31, 2020
	Interest Rate (%)	Interest Rate (%)
EUR	1.35%	2.07%
USD	1.10%	2.71%
TL	18.60%	17.82%

As of September 30, 2021, TL time deposit maturity varies between October 1, 2021 and March 29, 2022, foreign currency time deposits maturity varies between October 1, 2021 and December 30, 2021.

As of December 31, 2020, TL deposit maturity varies between January 4, 2021 and March 25, 2021, foreign currency deposits maturity varies between January 4, 2021 and December 8, 2021.

As at September 30, 2021 and December 31, 2020; the detail of cash and cash equivalents are as follows:

	September 30, 2021	December 31, 2020
Foreign currency cash and cash equivalents	428,461,972	157,834,723
- demand deposits	3,470,040	2,071,465
- time deposits	424,991,932	155,763,258
TL cash and cash equivalents	660,774,785	836,206,326
- demand deposits	34,867,505	19,422,791
- time deposits	275,917,465	488,481,682
- credit card receivables	350,472,186	328,470,720
- cheques given and payment orders	(482,371)	(168,867)
Total	1,089,236,757	994,041,049

^(**) Other cash and cash equivalents consist of credit card receivables with maturities up to 41 days.

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

6. FINANCIAL ASSETS

As at September 30, 2021 and December 31, 2020; the securities portfolio of the Group is as follows:

	September 30, 2021	December 31, 2020
Financial assets at fair value through profit / loss	289,042,718	241,385,756
Total available for sale financial assets and held to maturity	2,889,349,311	1,988,577,737
Available for sale financial investments	213,520,687	112,389,182
Available for sale asset backing financial investments and		
held to maturity policyholders' portfolio	2,675,828,624	1,876,188,555
Total securities portfolio	3,178,392,029	2,229,963,493

As at September 30, 2021 and December 31, 2020; financial assets as fair value through profit or loss are as follows:

_	Sep	tember 30, 2021	
	Cost	Fair value	Carrying value
Investment funds	40,599,986	44,169,177	44,169,177
Treasury bills and government bonds	134,493,135	144,699,740	144,699,740
Eurobonds-USD	53,268,261	52,722,722	52,722,722
Private sector bonds	42,538,600	43,893,012	43,893,012
Derivatives	3,558,067	3,558,067	3,558,067
Total financial assets at fair value through profit or loss	274,458,049	289,042,718	289,042,718
	Dec	ember 31, 2020	
	Dec Cost	cember 31, 2020 Fair value	Carrying value
Investment funds			Carrying value
	Cost	Fair value	
Investment funds Treasury bills and government bonds Eurobonds-USD	Cost 16,969,101	Fair value 23,232,675	23,232,675
Treasury bills and government bonds	Cost 16,969,101 162,587,639	Fair value 23,232,675 169,041,984	23,232,675 169,041,985
Treasury bills and government bonds Eurobonds-USD	Cost 16,969,101 162,587,639 36,936,845	Fair value 23,232,675 169,041,984 39,401,595	23,232,675 169,041,985 39,401,595

As at September 30, 2021 and December 31, 2020; available for sale financial assets owned by the Group are as follows:

	September 30, 2021			
	Cost	Fair value	Carrying value	
Treasury bills and government bonds - TL	119,404,610	123,187,025	123,187,025	
Private Sector bonds	76,736,416	90,333,662	90,333,662	
Total available for sale financial investments	196,141,026	213,520,687	213,520,687	
	-			
	De	cember 31, 2020		
	Cost	Fair value	Carrying value	
Treasury bills and government bonds - TL		,	Carrying value 44,752,220	
Treasury bills and government bonds - TL Private Sector bonds	Cost	Fair value		

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

6. FINANCIAL ASSETS (Continued)

As at September 30, 2021 and December 31, 2020; available for sale financial assets backing insurance contracts and held to maturity financial assets are as follows:

	September 30, 2021			
	Cost	Fair value	Carrying value	
Treasury bills and government bonds-TL	39,670,892	32,071,882	32,071,882	
Eurobonds - USD	772,603,182	726,383,779	726,383,779	
Eurobonds - EUR	997,261	1,086,722	1,086,722	
Time deposits - TL	2,500,000	2,512,907	2,512,907	
Held to maturity Eurobonds- USD	1,877,807,632	1,913,773,334	1,913,773,334	
Total available for sale asset backing financial investments				
and held to maturity policyholders' portfolio	2,693,578,967	2,675,828,624	2,675,828,624	
_	D	ecember 31, 2020		
	Cost	Fair value	Carrying value	
Treasury bills and government bonds-TL	42,405,896	36,255,179	36,255,179	
Eurobonds - USD	739,032,143	772,301,793	772,301,794	
Eurobonds - EUR	872,726	980,880	980,879	
Time deposits - TL	2,500,000	2,717,820	2,717,820	
Held to maturity Eurobonds- USD	1,048,614,471	1,063,932,883	1,063,932,883	
Total available for sale asset backing financial investments		, , , , , , , , , , , , , , , , , , , ,	, , , , , , , , , , , , , , , , , , , ,	
and held to maturity policyholders' portfolio	1,833,425,236	1,876,188,555	1,876,188,555	

As at September 30, 2021 and September 30, 2020; financial assets at fair value through profit or loss and available for sale financial assets movement table are as follows:

	2021	2020
Opening, January 1	2,229,963,493	1,771,746,764
Purchases	1,864,625,036	4,653,327,781
Disposals	(819,863,859)	(3,777,250,272)
Change in the valuation - unrealized gain and losses	11,143,886	2,848,198
Disposals through the redemption	(398,901,278)	(481,357,375)
Unrealized exchange rate gains/(losses)	359,014,074	142,540,807
Change in balance recognized under equity	(57,274,748)	(47,862,595)
Change in balance recognized under life mathematical reserves	(10,314,575)	(12,144,053)
Closing, September 30	3,178,392,029	2,251,849,255

The maturity analysis of financial assets is as follows:

As at September 30, 2021 and December 31, 2020; the remaining contractual maturities of financial assets are as follows:

	September 30, 2021						
	No stated maturity	0-3 months	3-6 months	6 months to 1 year	1-3 years	More than 3 years	Total
Eurobonds	_	_	_	-	25,093,832	2,329,464,772	2,354,558,604
Investment funds	44,169,177	-	-	-	· · · · -	-	44,169,177
Government bonds and							
treasury bills	-	-	-	38,911,089	63,588,104	197,459,457	299,958,650
Private sector bonds	-	52,158,390	13,567,650	13,555,100	39,944,691	15,000,844	134,226,675
Eurobond private sector	-	-	81,401,551	26,811,623	73,843,789	157,350,986	339,407,949
Time deposits	-	2,512,907	-	-	-	-	2,512,907
Derivative securities	3,558,067		-	-	-	-	3,558,067
	47,727,244	54,671,297	94,969,201	79,277,812	202,470,416	2,699,276,059	3,178,392,029

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

6. FINANCIAL ASSETS (Continued)

	December 31, 2020						
	No stated	0-3	3-6	6 months	1-3	More than	
-	maturity	months	months	to 1 year	years	3 years	Total
Eurobonds	-	-	_	_	15,575,411	1,444,398,905	1,459,974,316
Investment funds	23,232,675	-	-	-	-	-	23,232,675
Government bonds and							
treasury bills	-	-	-	-	135,724,732	114,324,652	250,049,384
Private sector bonds	-	4,056,317	11,565,136	33,300,015	7,682,174	15,026,331	71,629,973
Eurobond private sector	-	-	-	-	176,252,040	240,390,794	416,642,834
Time deposits	-	2,717,820	-	-	-	-	2,717,820
Derivative securities	5,716,491	-	-	-	-	-	5,716,491
	28,949,166	6,774,137	11,565,136	33,300,015	335,234,357	1,814,140,682	2,229,963,493

The currency analysis of financial assets is as follows:

	September 30, 2021			
	Currency Type	Currency Amount	Rate	Amount TL
Financial assets available-for-sale	TL			213,520,687
				213,520,687
Financial assets at fair value through profit or loss	USD TL	5,938,247	8.8785	52,722,726 236,319,992
	IL			289,042,718
Financial investments with risks on policy holders	USD	297,365,220	8.8785	2,640,157,106
	EUR TL	105,576	10.2933	1,086,725 34,584,793
				2,675,828,624
Total securities portfolio				3,178,392,029
		December 31, 2	2020	
		December 31, 2	2020	
	Currency Type	Currency Amount	Rate	Amount TL
Financial assets available-for-sale	Currency Type TL			Amount TL 112,389,182
Financial assets available-for-sale				
Financial assets available-for-sale Financial assets at fair value through profit or loss				112,389,182
	TL TL	Currency Amount	Rate	112,389,182 112,389,182 201,984,161 39,401,595
	TL TL	Currency Amount	Rate	112,389,182 112,389,182 201,984,161
Financial assets at fair value through profit or loss	TL USD USD EUR	5,367,699 250,151,172	7.3405 7.3405	112,389,182 112,389,182 201,984,161 39,401,595 241,385,756 1,836,234,678 980,879

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

7. REINSURANCE SHARE OF INSURANCE LIABILITIES

As at September 30, 2021 and December 31, 2020; reinsurance share of insurance liabilities are as follows:

	September 30, 2021	December 31, 2020
Reinsurers' share of outstanding claims	19,846,103	6,193,687
Reinsurers' share of unearned premiums reserve	2,946,621	3,245,141
Reinsurers' share of life mathematical reserve	1,864,816	1,510,791
	24,657,540	10,949,619

8. PREMIUM AND OTHER INSURANCE RECEIVABLES

As at September 30, 2021 and December 31, 2020; premium and other insurance receivables are as follows:

	September 30, 2021	December 31, 2020
Policyholders and reinsurance companies	36,117,695	35,330,094
Total premium and other insurance receivables	36,117,695	35,330,094

As at September 30, 2021 and December 31, 2020; maturity distribution of neither past due nor impaired insurance operations receivables is as follows:

	September 30, 2021	December 31, 2020
Receivables from policyholders and reinsurance companies		
Up to 3 months	5,979,607	6,100,353
3 to 6 months	3,684,436	4,080,780
6 to 9 months	2,089,504	2,499,183
9 to 12 months	701,823	808,809
	12,455,370	13,489,125

As at September 30, 2021 and December 31, 2020; an analysis of the aging of overdue but not impaired insurance operations receivables is as follows:

	September 30, 2021	December 31, 2020
Overdue 0-3 months	15,735,512	9,957,112
Overdue 3-6 months	521,628	183,073
Overdue 6-9 months	537,880	119,886
Overdue 9-12 months	80,963	63,454
Overdue 1 year	11,361	613,881
	16,887,344	10,937,406
Total	29,342,714	24,426,531

As of September 30, 2021, total of receivables from reinsurance companies and intermediaries are TL 6,774,981 (31 December 2020: TL 10,903,563).

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

8. PREMIUM AND OTHER INSURANCE RECEIVABLES (Continued)

As at September 30, 2021 and December 31, 2020; the collateral held by the Group as security for its receivables are as follows:

	September 30, 2021			
	USD	EUR	TL	Total (TL)
Guarantees received				
Letter of guarantees	532,710	-	25,801,692	26,334,402
Mortgage deed		-	309,450	309,450
Other guarantees	957,842	28,440	92,800	1,079,082
	1,490,552	28,440	26,203,942	27,722,934
		December 3	1, 2020	
	USD	EUR	TL	Total (TL)
Guarantees received				
Letter of guarantees	440,430	-	19,863,500	20,303,930
Mortgage deed	-	-	309,700	309,700
Other guarantees	809,447	24,888	97,800	932,135
	1,249,877	24,888	20,271,000	21,545,765

9. PENSION BUSINESS RECEIVABLES AND PAYABLES

As at September 30, 2021 and December 31, 2020; pension business receivables are as follows:

	September 30, 2021	December 31, 2020
Pension business receivables - deferred income reserves	170,215,239	169,270,198
Receivables pension operations	40,829,640	27,539,314
Capital advance for pension funds	843,333	771,273
Total individual pension business receivables, net	211,888,212	197,580,785

As at September 30, 2021 and December 31, 2020; pension business payables are as follows:

	September 30, 2021	December 31, 2020
Temporary account of participants	317,245,331	304,074,321
Pension business payables - deferred income reserves (*)	211,807,107	215,970,209
Total pension business payables	529,052,438	520,044,530

^(*) Reserve for account management fee deferred over 7 years based on the average deviation of the contract terms of pension portfolio.

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

10. OTHER ASSETS

As at September 30, 2021 and December 31, 2020; other assets are as follows:

	September 30, 2021	December 31, 2020
Prepaid expenses	18,541,565	35,370,184
Other receivables from other related parties	2,613,283	1,024,260
Advances given	2,284,450	1,306,315
Advances to personnel	1,629,820	1,881,965
Income accruals	1,627,335	-
Receivables from shareholders (Note 33)	565,596	547,351
Other receivables from third parties	141,795	186,285
Deposits and guarantees given	87,700	88,836
Other	312,191	263,248
Total other assets	27,803,735	40,668,444

11. PROPERTY AND EQUIPMENT, NET

As of September 30, 2021 and December 31, 2020; tangible assets movement and its accumulated depreciation is as follows:

Cost	January 1, 2021	Additions	Disposals	September 30, 2021
Machinery and equipment	16,044,008	16,084,306	(190,788)	31,937,526
Furniture and fixtures	22,648,518	8,811,844	(60,945)	31,399,417
Other tangible assets	30,677,139	928,904	-	31,606,043
Motor Vehicles	1,721,735	5,588,745	(1,138,000)	6,172,480
Right of use assets	45,617,311	21,478,528	(45,153,387)	21,942,452
Total	116,708,711	52,892,327	(46,543,120)	123,057,918
Accumulated depreciation	January 1, 2021	Period charge	Disposals	September 30, 2021
Machinery and equipment	(10,016,603)	(3,458,251)	176,311	(13,298,543)
Furniture and fixtures	(15,313,519)	(3,071,603)	7,077	(18,378,045)
Other tangible assets	(18,573,519)	(2,375,391)	-	(20,948,910)
Motor Vehicles	(616,214)	(748,749)	512,100	(852,863)
Right of use assets	(19,423,305)	(8,101,393)	22,364,691	(5,160,007)
Total	(63,943,160)	(17,755,387)	23,060,179	(58,638,368)
Net book value	52,765,551			64,419,550
Cost	January 1, 2020	Additions	Disposals	September 30, 2020
Machinery and equipment	13,296,320	4,342,519	(1,603,386)	16,035,453
Furniture and fixtures	21,007,774	2,105,669	(496,307)	22,617,136
Other tangible assets	29,640,700	1,036,439	(470,307)	30,677,139
Vehicles	1,721,735	- 1,030,437	_	1,721,735
Right of use assets	42,063,298	1,888,198	-	43,951,496
	107,729,827	9,372,825	(2,099,693)	115,002,959

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

11. PROPERTY AND EQUIPMENT, NET (Continued)

Accumulated depreciation	January 1, 2020	Period charge	Disposals Sep	otember 30, 2020
Machinery and equipment	(9,308,787)	(1,641,166)	1,603,386	(9,346,567)
Furniture and fixtures	(13,148,826)	(1,923,487)	430,069	(14,642,244)
Other tangible assets	(15,501,314)	(2,289,040)	-	(17,790,354)
Vehicles	(271,867)	(258,261)	-	(530,128)
Right of use assets	(9,172,556)	(7,907,488)	-	(17,080,044)
Total	(47,403,350)	(14,019,442)	2,033,455	(59,389,337)
Net book value	60,326,477			55,613,622

12. INTANGIBLE ASSETS, NET

As of September 30, 2021 and December 31, 2020; intangible assets movement and its accumulated amortization are as follows:

Cost	January 1, 2021	Additions	Transfer	Disposals	September 30, 2021
Software	157,401,429	34,955,920	17,717,383	-	210,074,732
Capitalized software development costs	14,754,297	35,767,775	(17,717,383)	(70,129)	32,734,560
Total	172,155,726	70,723,695	_	(70,129)	242,809,292
Accumulated amortization	January 1, 2021	Period charge	Transfer	Disposals	September 30, 2021
Software	(78,358,177)	(25,534,681)	3,434		(103,889,424)
Total	(78,358,177)	(25,534,681)	3,434	_	(103,889,424)
Net book value	93,797,549				138,919,868
Cost	January 1, 2020	Additions	Transfer	Disposals	September 30, 2020
Software	101,306,352	22,592,257	5,332,653	-	129,231,262
Capitalized software development costs	14,745,065	10,502,825	(5,332,653)	(4,483,171)	15,432,066
	116,051,417	33,095,082	_	(4,483,171)	144,663,328
Accumulated amortization	January 1, 2020	Period charge	Transfer	Disposals	September 30, 2020
Software	(57,516,287)	(14,620,151)	-	-	(72,136,438)
Total	(57,516,287)	(14,620,151)	-	-	(72,136,438)
Net book value	58,535,130				72,526,890

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

13. OTHER FINANCIAL ASSETS

Other financial assets include equity participations that are classified as available for sale. As these equity participations do not have a quoted market price in an active market and other methods of reasonably estimating their values would be inappropriate and impracticable, they are stated at cost. As at September 30, 2021 and December 31, 2020; the details of other financial assets are as follows:

	September 30, 2021		December 3	1, 2020
	Participation		Participation	
	rate (%)	Amount	rate (%)	Amount
Third Party				
Milli Reasürans A.Ş.	0.1494	575,082	0.1494	575,082
Emeklilik Gözetim Merkezi A.Ş.	5.5553	321,991	5.5553	292,303
Enternasyonel Turizm Yatırım A.Ş.	0.0001	2	0.0001	2
Endüstri Holding A.Ş.	0.0001	625	0.0001	625
		897,700		868,012

14. LEASE LIABILITIES

As at September 30, 2021 and December 31, 2020; lease liabilities are as follows:

	September 30, 2021	December 31, 2020
Chart town loss lightlities (undiscounted)	0.221.027	11 222 070
Short-term lease liabilities (undiscounted)	9,331,927	11,333,979
Long term lease liabilities (undiscounted)	12,618,747	38,219,902
Discount amount with lease's incremental		
borrowing rate of interest	(3,914,178)	(19,211,506)
Total	18,036,496	30,342,375

Movement of lease liabilities for the period ended September 30, 2021 and December 31, 2020 are as follows:

	September 30, 2021	December 31, 2020
	20.242.255	25 522 545
Opening balance, January 1	30,342,375	35,733,545
Lease increase / decrease	20,774,004	3,554,013
Lease cancellation – payments (*)	(42,854,037)	
Lease payments	(11,543,826)	(16,960,928)
Lease cancellation - interest (*)	15,853,383	-
Exchange rate valuation	9,074	1,026,263
Interest payments	5,455,523	6,989,482
Closing balance	18,036,496	30,342,375

^(*) As of 30 September 2021, the figures represents the cancellations of the rent contracts.

15. DUE TO INSURANCE AND REINSURANCE COMPANIES

As at September 30, 2021 and December 31, 2020; due to insurance and reinsurance companies are as follows:

	September 30, 2021	December 31, 2020
Due to the intermediaries	53,195,952	29,782,098
Due to the reinsurance companies	11,065,510	1,945,015
Due to the policyholders	(256,710)	486,380
	64,004,752	32,213,493

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

16. OTHER PROVISIONS

As at September 30, 2021 and December 31, 2020; provision for expenses and lawsuit provisions are as follows:

	September 30, 2021	December 31, 2020
Personnel bonus provision	28,950,880	27,035,574
Provision for lawsuit against the Group (Note 34)	11,129,864	11,366,186
Commission provision	7,329,000	6,967,000
Bonus provision for sales activities	6,434,403	7,467,324
	53,844,147	52,836,084

17. TAXES

Corporate taxes

Statutory income is subject to corporate tax at 25% (2020: 22%). This rate is applied to accounting income modified for certain exemptions (like dividend income) and deductions (like investment incentives), and additions for certain non-tax deductible expenses and allowances for tax purposes. If there is no dividend distribution planned, no further tax charges are made.

Dividends paid to the resident institutions and the institutions working through local offices or representatives are not subject to withholding tax. Withholding tax rate on the dividend payments other than the ones paid to the non-resident institutions generating income in Turkey through their operations or permanent representatives and the resident institutions is 15%. In applying the withholding tax rates on dividend payments to the non-resident institutions and the individuals, the withholding tax rates covered in the related Double Tax Treaty Agreements are taken into account. Appropriation of the retained earnings to capital is not considered as profit distribution and therefore is not subject to withholding tax.

In the Official Gazette dated April 22, 2021 and numbered 31462, the Law No. 7316 on the procedure for the collection of public receivables and Law Amending Certain Laws has been published and the Provisional Article 13 has been added to the Corporate Tax Law with the 11th article of the stated Law. Corporate tax rate of 20% with the added item will ve applied as;

- 25% for corporate earnings for the 2021 taxation period.
- 23% for corporate earnings for the 2022 taxation period.

The respective rate increase came into effect on April 22, 2021, starting from the declarations that must be valid for the corporate earnings for the taxation period starting from January 1, 2021.

Corporate tax is declared until the evening of the twenty-fifth of the fourth month following the end of the relevant accounting period and is paid in one installment until the end of the relevant month. In accordance with the tax legislation, the temporary tax will be calculated at a rate of 25% (2020: 22%), starting from the 2nd period advance tax return for the 2021 period, over the earnings generated in quarterly periods, and the amounts paid will be deducted from the tax calculated on the annual earnings.

In accordance with the tax legislation, tax losses can be carried forward to offset against future taxable income for up to five years. Tax losses cannot be carried back to offset profits from previous years.

In Turkey, there is no procedure for a final and definite agreement on tax assessments. Companies file their tax returns with their tax offices by the end of the 25th day of the fourth month following the close of the accounting period to which they relate. Tax returns are open for five years from the beginning of the year that follows the date of filing during which time the tax authorities have the right to audit tax returns, and the related accounting records on which they are based, and may issue re-assessments based on their findings.

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

17. TAXES (Continued)

Income tax

As at September 30, 2021 and December 31, 2020; prepaid income taxes are netted off with the current income tax payable as stated below:

	September 30, 2021	December 31, 2020
Income taxes payable	131,252,356	90,440,439
Prepaid income taxes (-)	(92,987,391)	(77,072,087)
•		
Current tax liabilities / (assets)	38,264,965	13,368,352

Deferred taxes

The Group recognizes deferred tax assets and liabilities based upon temporary differences arising between its consolidated financial informations as reported for International Accounting Standards (IAS) purposes and its statutory tax consolidated financial informations. These differences usually result in the recognition of revenue and expenses in different reporting periods for IAS.

The details of deferred taxes are presented in the following tables.

	Cumulative tempo	orary Differences	Deferred tax ass	ets / (liabilities)
	September 30, 2021	December 31,2020	September 30 ,2021	December 31,2020
Deferred income reserves	211,807,107	215,970,209	49.102.185	45,759,575
Expense accruals	96,858,979	19.391.622	24,214,745	3,878,324
Expense accruals – bonus and commission provision	-	22,674,923	_	4,988,483
Provision for employee termination benefit	26,766,824	21,040,315	5,353,365	4,208,063
Unused vacation provision	4,729,994	5,421,984	1,135,199	1,084,397
Claims for Insured Customer Claims	6,449,326	5,934,574	1,289,865	1,186,915
Right of use asset	1,240,612	4,134,800	310,153	826,960
Provision for lawsuits	2,033,564	2,740,711	467,720	548,142
Provisions for agency receivables	2,630,293	2,370,474	526,059	474,095
Incentive commission	336,243	2,011,614	84,061	402,323
Withdrawal of outstanding legal claims	8,207,305	7,977,352	2,051,826	1,595,470
Deposits internal rate of return linear interest rate difference	178,623	258,455	44,656	51,691
Total deferred tax assets	361,238,870	309,927,033	84,579,834	65,004,438
Deferred acquisition cost	(564,083,768)	(561,895,075)	(127,117,925)	(107,915,256)
Pension business receivables	(170,215,239)	(169,270,198)	(38,568,039)	(35,291,579)
Net difference between the carrying values and tax	(, , ,	(,,,	(,,,	(, - ,,
base values of tangible assets and intangible assets	(50,109,913)	(36,380,067)	(10,002,018)	(7,276,013)
Eurobond valuation difference	(2,982,635)	(2,016,089)	(745,659)	(403,218)
Derivative securities	(3,558,067)	(5,716,491)	(889,517)	(1,143,298)
Profit commission	(1,647,865)	-	(411,966)	() -))
Valuation VUK-SFRS difference	(261,624)	-	(65,406)	
Price difference in coupon bond held for trading	(2,985,325)	56,509	(746,331)	11,302
Total deferred tax liabilities	(795,844,436)	(775,221,411)	(178,546,861)	(152,018,062)
Deferred tax assets/(liabilities) accounted for under equity over				
the fair value reserve for available for sale financial assets	14,134,551	(38,000,708)	3,533,638	(7,600,142)
Effect of rate change of corporation tax	-	(58,000,700)	151,430	261,067
Deferred tax liabilities, net	(420,471,015)	(503,295,086)	(90,281,959)	(94,352,699)

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

17. TAXES (Continued)

Deferred taxes (Continued)

Movement of deferred tax liabilities for the period ended September 30, 2021 and 2020 are as follows:

	2021	2020
Opening balance, January 1	(94,352,699)	(57,708,907)
ROP DAC impact (*)	-	(13,314,930)
Charged to profit or loss	(7,898,014)	(1,448,300)
Cancellation available for sale financial assets that are recognized in		
shareholders' equity of deferred tax assets	7,600,142	(1,086,924)
Deferred tax asset /(liability) recognized in other comprehensive income		
due to fair value losses on available for sale financial assets	3,533,638	9,409,708
Fair Value - IRR corporate tax rate change effect	(109,636)	
Deferred tax asset of actuarial loss on employment		
termination provision	944,610	546,481
Closing balance, "September 30	(90,281,959)	(63,602,872)

Deferred income tax is provided in full, using the liability method, on temporary differences arising between the tax bases of assets and liabilities and their carrying amounts in the consolidated financial informations. Deferred income tax assets and liabilities are determined using tax rates and tax legislation that has been enacted at the information of financial position date and is expected to apply when the related deferred income tax asset is realized or the deferred income tax liability is settled.

There are no unrecognized deferred tax assets in the periods presented.

Income tax expenses for the period ended September 30, 2021 and September 30, 2020; are as follows:

	January 1 - September 30, 2021	January 1 - September 30, 2020
Income tax expense recognized in profit or loss:		
- Current tax charge	(132,389,856)	(78,731,779)
- Deferred tax charge	(7,898,014)	(1,448,359)
Adjustments recognized in the period for current tax of prior periods	5,691,081	3,824,080
Income tax expense	(134,596,789)	(76,356,058)

The total provision for taxes on income is different than the amount computed by applying the Turkish statutory tax rate of 25% (2020: 22%) to income before provision for taxes as shown in the following reconciliation:

	January 1 - September 30, 2021	January 1 – September 30, 2020
Profit before taxes Tax rate Taxes on income per statutory tax rate	528,990,126 25% (132,247,532)	340,408,927 22% (74,889,964)
Non-deductible expenses, net	(2,349,257)	(1,466,094)
Income tax expense	(134,596,789)	(76,356,058)

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

18. EMPLOYMENT TERMINATION BENEFITS

	September 30, 2021	December 31, 2020
Provision for employment termination benefits	26,766,824	21,040,315
Total	26,766,824	21,040,315

Under Turkish Labour Law, the Group is required to pay termination benefits to each employee who has completed one year of service and whose employment is terminated without due cause, is called up for military service, dies or who retires after completing 25 years of service and attains the retirement age.

The amount payable consists of one month's salary limited to a maximum of TL 8,285 (December 31, 2020: TL 7,117) for each year of service as of September 30, 2021.

IAS 19 requires actuarial valuation methods to be developed to estimate the enterprise's obligation; the provision has been calculated by using projection method. The provision has been calculated by estimating the present value of the future probable obligation of the Group arising from the retirement of the employees. Accordingly, the following actuarial assumptions were used in the calculation of the total liability:

	September 30, 2021	December 31, 2020
Estimated yearly salary increase rate	8.50%	8.50%
Yearly discount rate	13.50%	13.50%

The movement in the provision for employment termination benefits in the current period is as follows:

	2021	2020
Opening balance, January 1	21,040,315	15,971,826
Paid during the period	(2,845,022)	(1,603,559)
Service cost	1,718,338	1,301,782
Interest cost	2,130,143	1,533,116
Actuarial loss	4,723,050	2,484,005
Closing balance, "September 30	26,766,824	19,687,170

19. DEFERRED EXPENSES

As at September 30, 2021 and 2020; movements of deferred expenses are as follows:

	2021	2020
Deferred acquisition costs, gross January 1	501,372,663	444,609,469
Acquisition costs deferred during the period	158,222,702	131,581,854
Amortization	(95,511,598)	(99,310,896)
Deferred acquisition costs - ,September 30	564,083,768	476,880,427
Deferred commission costs, gross January 1	23,152,652	33,622,456
Commission cost deferred during the period	3,783,527	(8,038,860)
Deferred commission costs - ,September 30	26,936,179	25,583,596
Total deferred expenses	591,019,947	502,464,023

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

20. OTHER PAYABLES AND LIABILITIES

As at September 30, 2021 and December 31, 2020; other payables and liabilities are as follows:

	September 30, 2021	December 31, 2020
		_
Expense accruals	57,044,512	909,826
Taxes and funds payable	36,252,521	25,364,003
Payables to suppliers	13,126,705	22,637,816
Unused vacation provision	5,775,748	6,467,738
Payables to related parties	4,610,186	11,047,722
Payables to shareholders	2,137,809	60,422,578
Payables to personnel	1,345,847	461,124
Deferred commission income	1,328,357	1,681,106
Deposits and guarantees	5,870	4,836
Other deferred income	2,055	2,055
Total	121,629,610	128,998,804

21. INSURANCE CONTRACT LIABILITIES

Insurance contract liabilities as at September 30, 2021 and December 31, 2020; are as follows:

	September 30, 2021	December 31, 2020
Gross insurance contract liabilities		
Life mathematical reserves (*)	2,979,333,891	2,059,624,778
Reserve for unearned premiums	75,044,901	64,925,125
Claims provision	105,651,417	86,835,225
	3,160,030,209	2,211,385,128
Reinsurance share of insurance contract liabilities		
Mathematical reserves, ceded (Note 7)	1,864,816	1,510,791
Reserve for unearned premiums, ceded (Note 7)	2,946,621	3,245,141
Claims provision, ceded (Note 7)	19,846,103	6,193,687
	24,657,540	10,949,619
Net insurance contract liabilities		
Life mathematical reserves	2,977,469,075	2,058,113,987
Reserve for unearned premiums	72,098,280	61,679,984
Claims provision	85,805,314	80,641,538
Net insurance liabilities	3,135,372,669	2,200,435,509

^(*) As of September 30, 2021, the negative fair value difference of financial assets at insuree's risk amounting to TL 16,821,980 (December 31, 2020: negative fair value difference of financial assets at insuree's risk amounting to TL 13,630,243), deferred taxes on the fair value difference of financial assets at insuree's risk amounting to TL 11,630 (December 31, 2020: TL 2,059,572) and reinsurers share of TL 1,864,816. (December 31, 2020: 1,510,791) have been included in the above mentioned mathematical reserve table.

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

21. INSURANCE CONTRACT LIABILITIES (Continued)

Movements in insurance liabilities and reinsurance assets

Claims:

September 30, 2021	Gross	Ceded	Net
Total at the beginning of the year	78,857,873	(6,193,688)	72,664,185
Change during period	26,793,544	(13,652,415)	13,141,129
Total at the end of the period	105,651,417	(19,846,103)	85,805,314
September 30, 2021			
Reported claims	72,417,545	(10,229,999)	62,187,546
Incurred but not reported	33,233,872	(9,616,104)	23,617,768
Total at the end of the period	105,651,417	(19,846,103)	85,805,314
December 31, 2020	Gross	Ceded	Net
			_
Total at the beginning of the year	69,621,739	(7,301,645)	62,320,094
Change during period	17,213,486	1,107,958	18,321,444
Total at the end of the period	86,835,225	(6,193,687)	80,641,538
<u>December 31, 2020</u>			
Reported claims	63,283,232	(4,842,273)	58,440,959
Incurred but not reported	23,551,993	(1,351,414)	22,200,579
	86,835,225	(6,193,687)	80,641,538

Claims paid and change in outstanding claims provision for the period ended September 30, 2021 and 2020 are as follows:

	January 1 - September 30, 2021	July 1 - September 30, 2021	January 1 - September 30, 2020	July 1 - September 30, 2020
Cash paid for claims settled during the period	154,429,715	51,848,955	153,805,807	46,702,716
- Surrender and maturity from life				
savings	48,804,119	13,464,824	37,826,021	12,742,374
- Death and disability claims (*)	66,474,205	22,472,735	39,245,164	14,424,433
- Surrender from life protection	39,151,391	15,911,396	76,734,622	19,535,909
Change in outstanding				
claims provision	5,163,774	2,143,782	6,505,699	1,633,181
Claims paid and change in				
outstanding claims provision	159,593,489	53,992,737	160,311,506	48,335,897

^(*) The amounts are presented net off reinsurance.

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

21. INSURANCE CONTRACT LIABILITIES (Continued)

Reserve for unearned premiums:

September 30, 2021	Gross	Ceded	Net
Reserve for unearned premiums at the beginning of the year	64,925,125	(3,245,141)	61,679,984
Premiums written during the period	1,398,290,164	(20,287,775)	1,378,002,389
Premiums earned during the period	(1,388,170,388)	20,586,295	(1,367,584,093)
Reserve for unearned premiums at the end of the period	75,044,901	(2,946,621)	72,098,280
December 31, 2020	Gross	Ceded	Net
Reserve for unearned premiums at the beginning of the year	95,871,371	(6,516,522)	89,354,849
Premiums written during the period	1,331,872,294	(18,449,424)	1,313,422,870
Premiums earned during the period	(1,362,818,540)	21,720,805	(1,341,097,735)
Reserve for unearned premiums at the end of the period	64,925,125	(3,245,141)	61,679,984

Life mathematical reserves:

	2021 Mathematical reserve TL	2020 Mathematical reserve TL
Total at the beginning of the year, January 1 Additions Disposals	2,066,132,182 1,005,947,184 (75,935,126)	1,293,865,592 859,151,702 (104,518,631)
Total at the end of the period, ,September 30 (*)	2,996,144,240	2,048,498,663

^(*) As of September 30, 2021, the negative fair value difference of financial assets at insuree's risk amounting to TL 16,821,980 (December 31, 2020: negative fair value difference of financial assets at insuree's risk amounting to TL 13,630,243), deferred taxes on the fair value difference of financial assets at insuree's risk amounting to TL 11,630 (December 31, 2020: TL 2,059,572) and reinsurers share of TL 1,864,816. (December 31, 2020: 1,510,791) have been included in the above mentioned mathematical reserve table.

Claims development tables

The claims provision is sensitive to some key assumptions. The sensitivity of certain assumptions like legislative change, uncertainty in the estimation process, etc., is not possible to quantify. Furthermore, because of delays that arise between occurrence of a claim and its subsequent notification and eventual settlement, the outstanding claim provisions are not known with certainty at the reporting date.

Consequently, the ultimate liabilities will vary as a result of subsequent developments. Differences resulting from reassessment of the ultimate liabilities are recognized in subsequent consolidated financial informations.

As at September 30, 2021; claim development table of the Group is as follows:

Accident year	2014 and earlier	2015	2016	2017	2018	2019	2020	2021	Total
Current estimate of claims									
Accident year	7,559,874	2,513,981	5,423,286	4,338,141	4,287,923	2,791,999	9,554,133	28,417,684	64,887,021
1 year later	651,195	258,995	698,344	1,207,515	875,836	878,211	1,786,469	-	6,356,565
2 year later	-	63,680	202,905	60,275	173,221	227,298	_	-	727,379
3 year later	5,207	15,300	54,797	186,781	37,970	-	_	-	300,055
4 year later	_	32,700	- /	86,398	-	_	_	_	119,098
5 year later	_	,	27,427	-	_	_	_	_	27,427
6 year later	_	_	,	_	_	_	_	_	,
7 year later	-	-	-	-	-	-	-	-	-
Total	8,216,276	2,884,656	6,406,759	5,879,110	5,374,950	3,897,508	11,340,602	28,417,684	72,417,545
Incurred but not reported									25,026,567
Additional claims according to the actuarial									
claim development table									8,207,305
Total gross provision for outstanding									105 (51 415
claims as at September 30, 2021									105,651,417

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

21. INSURANCE CONTRACT LIABILITIES (Continued)

As at December 31, 2020, claim development table of the Group is as follows:

	2013								
Accident year	and earlier	2014	2015	2016	2017	2018	2019	2020	Total
Current estimate of claims									
Accident year	7,463,038	2,277,564	3,682,162	5,568,507	4,513,726	5,848,200	2,485,075	24,805,391	56,643,663
1 year later	303,787	653,435	746,887	688,736	1,253,245	1,083,777	1,094,766	-	5,824,633
2 year later	13,730	· -	99,636	197,714	13,001	201,276	_	-	525,357
3 year later	· -	4,995	19,626	54,797	131,978	-	-	-	211,396
4 year later	-	_	41,370	-	-	-	-	-	41,370
5 year later	-	-	7,076	-	-	-	-	-	7,076
6 year later	-	-	-	-	-	-	-	-	-
7 year later	29,737	-	-	-	-	-	-	-	29,737
Total	7,810,292	2,935,994	4,596,757	6,509,754	5,911,950	7,133,253	3,579,841	24,805,391	63,283,232
Incurred but not reported									15,574,641
Additional claims according to the									
actuarial claim development table									7,977,352
Total gross provision for outstanding									
claims as at September 30, 2021									86,835,225

22. EQUITY

Share capital of the Group as at September 30, 2021 and December 31, 2020; are as follows:

	September 30, 2021		December 31, 2020		
	Shareholding		Shareholding		
	%	TL	%	TL	
Hacı Ömer Sabancı Holding A.Ş.	40.00	72,000,007	40.00	72,000,007	
Ageas InsuranceInternational NV(*)	40.00	72,000,007	40.00	72,000,007	
Other	0.09	163,804	0.09	166,026	
Publicly Traded	19.91	35,836,182	19.91	35,833,960	
Total share capital	100.00	180,000,000	100.00	180,000,000	

^(*) The Share Purchase Agreement was signed between Ageas Group and Aviva Group on 23 February 2021. Accordingly, Ageas agreed to take over all of Aviva's shares with a nominal value of TL 72,000,006.72, representing 40% of the capital owned by Aviva. The closing conditions determined in the Share Purchase Agreement have been fulfilled, and all of Aviva's shares representing 40% of our Company's capital were taken over by Ageas as of 5 May 2021.

The upper limit of registered capital of the Group is TL 500,000,000 as of September 30, 2021, and it is divided into 50,000,000,000 registered shares each with nominal value of TL 0.01. The upper limit of registered capital change, which was approved and resolved at the general assembly meeting dated March 16, 2021, was registered on March 24, 2021. (December 31, 2020: The upper limit of registered capital of the company is 300,000,000 TL and it is divided into 30,000,000,000 registered shares, each with nominal value of TL 0.01.)

Profit and other capital reserves:

Details of the profit and other capital reserves are explained below:

	September 30, 2021	December 31, 2020
Profit reserves	325,319,340	190,370,612
Other capital reserves	837,095	837,095
Total	326,156,435	191,207,707

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

22. **EQUITY (Continued)**

Profit and other capital reserves (Continued):

Retained earnings as per the statutory consolidated financial informations, other than legal reserve requirements as referred below, are available for distribution. The legal reserves consist of first and second reserves, appropriated in accordance with the Turkish Commercial Code. The Turkish Commercial Code stipulates that the first legal reserve is appropriated out of statutory profits at the rate of 5% per annum, until the total reserve reaches 20% of the Group's paid-in share capital. The second legal reserve is appropriated at the rate of 10% per annum of all cash distributions in excess of 5% of the paid-in share capital. Under the Turkish Commercial Code, the legal reserves can only be used to offset losses unless they exceed 50% of paid-in share capital and are not available for any other usage.

Profit reserves

As at September 30, 2021 and December 31, 2020; details of profit reserves is as follows:

	September 30, 2021	December 31, 2020
Extraordinary reserves	229,767,945	110,043,953
Legal reserves	95,539,901	80,315,165
Statutory reserves	11,494	11,494
Total	325,319,340	190,370,612
Movement of profit reserves is presented be	elow:	

M	lovement	tot	profit	reserves	1S	presented	below:	

	September 30, 2021	December 31, 2020
Opening balance, January 1	190,370,612	135,728,079
Transfers	134,948,728	54,642,533
Closing balance	325,319,340	190,370,612

Profit reserves

As of 30 September 2021, the Group's profit reserves consists of 95,539,901 TL (31 December 2020: 80,315,165 TL) legal reserves, 11,494 TL (31 December 2020: 11,494 TL) statue reserves and 229,767,945 TL (31 December 2020: 110,043,953 TL) extraordinary reserves.

Other capital reserves

As of September 30, 2021 capital reserves of the Group amounting to TL 837,095 consist of the amount of TL 512,783 as a result of addition of TL 66,028,020 to capital, which is difference resulted between the amount of TL 82,320,000 that is pre-merger nominal paid capital of Aviva Emeklilik and TL 15,779,197 that is capital increase amount of Ak Emeklilik; participants' capitalization issue amounting to TL 324,312.

Fair value reserves from available for sale assets

Unrealized gains and losses due to changes in the fair values available for sale financial assets net of taxes are directly recognized in the shareholders' equity as "Fair value reserves from available for sale assets".

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

22. EQUITY (Continued)

Fair value reserves from available for sale assets (Continued)

Movement of the reserve is below:

	2021	2020
Opening balance, January 1	36,602,809	(294,093)
Unrealized gains and losses due to changes in the fair values of available for sale financial assets net of taxes	(45,081,396)	(37,332,824)
Closing balance, ,September 30	(8,478,587)	(37,626,917)

23. EARNINGS PER SHARE

The Group's earnings per share calculation is as follows:

	January 1- September 30, 2021	July 1- September 30, 2021	January 1- September 30, 2020	July 1- September 30, 2020
Profit for the period	394,393,337	136,653,005	264,052,869	133,044,683
Weighted average number of shares with nominal value of TL 0.01 nominal value per share	18,000,000,000	18,000,000,000	18,000,000,000	18,000,000,000
Earnings per share	0.0219	0.0076	0.0147	0.0074

As of September 30, 2021 capital of the Group consists of 18,000,000,000 shares with nominal value of TL 0.01 (December, 2020: 18,000,000,000 shares with nominal value of TL 0.01).

24. WRITTEN PREMIUMS

The distribution of written premiums is as follows:

	January 1- September 30, 2021			July 1- September 30, 2021				
	_	Reinsurer			Reinsurer			
	Gross	share	Net	Gross	share	Net		
Non-life	43,336,055	(188,632)	43.147.423	16.313.559	(43.078)	16.270.481		
Life (Life protection + savings)	1,354,954,109	(20,099,143)	1,334,854,966	521,386,343	(8,020,520)	513,365,823		
Total premium income	1,398,290,164	(20,287,775)	1,378,002,389	537,699,902	(8,063,598)	529,636,304		
	January	1- September 30	, 2020	July 1-	September 30	, 2020		
	•	Reinsurer		•	Reinsurer			
	Gross	share	Net	Gross	share	Net		
Non-life	51,130,761	(2,022,287)	49,108,474	13,444,924	140,895	13,585,819		
Life (Life protection + savings)	932,128,563	(11,503,014)	920,625,549	312,640,661	(3,905,389)	308,735,272		

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

25. INCOME GENERATED FROM PENSION BUSINESS

Income generated from pension business for the periods ended September 30, 2021 and September 30, 2020; are as follows:

	January 1- September 30, 2021	July 1 - September 30, 2021	January 1- September 30, 2020	July 1 - September 30, 2020
Fund management income	288,316,395	100,186,203	243,340,161	86,836,155
Management fee	70,014,916	21,162,979	68,120,366	21,219,783
Deferred entry fees income	16,222,335	5,056,536	18,856,045	6,075,828
Premium holiday charges	6,210	725	453,823	93,200
Total	374,559,856	126,406,443	330,770,395	114,224,966

26. FOREIGN EXCHANGE GAINS / (LOSSES), NET

Foreign exchange gains / (losses) for the periods ended September 30, 2021 and 2020; are as follows:

	January 1-	July 1 -	January 1-	July 1 -
	September 30,2021	September 30, 2021	September 30, 2020	September 30, 2020
Foreign exchange gains	102,099,463	30,892,411	51,698,418	25,299,485
Foreign exchange losses	(60,654,415)	(28,543,334)	(20,858,504)	(492,521)
Total	41,445,048	2,349,077	30,839,914	24,806,964

27. COMMISSION INCOME AND COMMISSION EXPENSE

Commission income for the periods ended September 30, 2021 and September 30, 2020; are as follows:

	January 1- September 30,2021	July 1 - September 30, 2021	January 1- September 30, 2020	July 1 - September 30, 2020
Commission income from reinsurance companies (net)	7,318,014	1,967,754	7,390,428	1,845,989
Total	7,318,014	1,967,754	7,390,428	1,845,989

Commission expense for the periods ended September 30, 2021 and September 30, 2020; are as follows:

	January 1- September 30,2021	July 1 - September 30, 2021	January 1- September 30, 2020	July 1 - September 30, 2020
Commission expenses due to personal accident insurance	(23,679,409)	(7,706,901)	(28,242,463)	(8,927,549)
Commission expenses due to life	, , , ,	, , , ,	, , , , ,	, , , ,
insurance	(233,540,351)	(104,254,247)	(129,698,110)	(42,642,142)
-Change in commission expenses	(270,363,651)	(115,506,274)	(157,470,863)	(55,707,931)
-Change in deferred acquisition cost	36,823,300	11,252,027	27,772,753	13,065,789
Total	(257,219,760)	(111,961,148)	(157,940,573)	(51,569,691)

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

28. INVESTMENT AND OTHER INCOME

Investment income for the periods ended September 30, 2021 and September 30, 2020; are as follows:

	January 1- September 30, 2021	July 1 - September 30, 2021	January 1- September 30, 2020	July 1 - September 30, 2020
		~ · · · · · · · · · · · · · · · · · · ·	~	
Interest income	178,401,495	58,043,270	121,825,533	56,675,157
-Income from financial assets at fair value				
through profit or loss	39,853,419	14,328,511	41,918,758	23,630,870
-Income from available for sale				
financial assets	138,548,076	43,714,759	79,906,775	33,044,287
Net income from sale of financial assets	25,460,104	13,203,850	10,870,209	(11,476,609)
 Income from financial assets at fair 				
value through profit or loss	(4,162,622)	(2,502,538)	(9,771,007)	(15,251,501)
 Income from available for sale 				
financial assets	29,622,726	15,706,388	20,641,216	3,774,892
Dividend and realization income				
from other financial assets	65,060	-	4,238,454	5,691,008
Net gains on derivatives fair value				
through profit or loss	21,412,546	21,466,927	(16,193,115)	(16,193,115)
Interest expense regarding lease liabilities	(5,455,524)	(798,682)	(5,296,647)	(1,701,449)
Investment management expenses	(271,744)	312,821	(28,256,255)	(8,240,346)
Other income, net	(10,468,652)	(7,776,112)	4,383,730	2,823,756
W 4 1 4 1 4				
Total investment and other	200 4 42 207	04.450.054	04 ==4 000	AT TTO 40A
income/(expense), net	209,143,285	84,452,074	91,571,909	27,578,402

29. PENSION EXPENSES INCLUDING COMMISSION

Pension expenses including commission for the periods ended September 30, 2021 and September 30, 2020; are as follows:

	January 1-	July 1 -	January 1-	July 1 -
	September 30, 2021	September 30, 2021	September 30, 2020	September 30, 2020
Fund management charge	(32,271,189)	(11,403,743)	(26,462,843)	(8,178,878)
Commission expense, net of DAC	(84,390,850)	(29,198,399)	(80,555,382)	(25,488,277)
- Commission expense	(103,968,213)	(39,564,580)	(81,701,091)	(36,710,105)
- Change in deferred acquisition cost	19,577,363	10,366,181	1,145,709	11,221,828
Takasbank commission expense	(4,582,622)	(1,522,230)	(4,302,845)	(1,441,632)
Other expense	(15,991,902)	(5,923,779)	(11,274,887)	(3,916,141)
Total pension expenses	(137,236,563)	(48,048,151)	(122,595,957)	(39,024,928)

30. GENERAL AND ADMINISTRATIVE EXPENSES

General and administrative expenses for the periods ended September 30, 2021 and September 30, 2020; are as follows:

	January 1- September 30, 2021	July 1 - September 30, 2021	January 1- September 30, 2020	July 1 - September 30, 2020
Personnel expenses	(236,653,447)	(78,489,177)	(186,283,007)	(58,756,805)
Outsourced expenses including IT services	(84,401,803)	(31,307,698)	(62,112,419)	(23,913,317)
Depreciation and amortization	(43,290,068)	(15,430,665)	(28,639,593)	(9,973,756)
Advertising and marketing expenses	(20,696,755)	(13,637,718)	(1,934,709)	(715,490)
Management expenses	(11,163,005)	(5,658,977)	(7,030,303)	(2,392,817)
Communication expenses	(4,819,388)	(1,729,497)	(4,334,096)	(1,362,654)
Representation and hosting expenses	(4,633,238)	(1,961,562)	(2,319,658)	(265,395)
Travelling and transportation expenses	(3,247,190)	(1,279,375)	(4,022,508)	(863,218)
Office supplies expenses	(2,247,219)	(523,614)	(1,320,714)	(384,787)
Other marketing, sales and				
distribution expenses	(2,193,835)	(1,514,209)	(1,093,142)	(304,151)
Brokerage expenses	(1,721,855)	(88,763)	(4,057,656)	(653,131)
Change in deferred acquisition cost	6,267,102	2,817,613	3,352,496	2,414,390
Other expenses	(15,221,050)	(4,035,781)	(8,852,356)	(4,098,525)
Total	(424,021,751)	(152,839,423)	(308,647,665)	(101,269,656)

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

30. GENERAL AND ADMINISTRATIVE EXPENSES (Continued)

Personnel expenses for the period ended September 30, 2021 and September 30, 2020; are as follows:

	January 1-	July 1 -	January 1-	July 1 -
	September 30, 2021	September 30, 2021	September 30, 2020	September 30, 2020
Salaries	(139,107,111)	(46,454,692)	(98,932,971)	(33,735,061)
Commission and promotion expenses	(31,854,532)	(16,293,832)	(30,369,517)	(10,424,594)
Social security expenses	(25,904,958)	(8,627,562)	(19,561,347)	(5,961,971)
Other salary expenses	(24,456,542)	(5,178,234)	(25,201,450)	(6,111,849)
Other personnel expenses	(10,498,381)	(2,915,747)	(7,943,451)	(2,215,039)
Employee termination benefit expenses	(3,848,481)	(1,282,827)	(2,834,898)	(951,354)
Unused vacation expenses	(482,979)	2,764,180	(1,262,364)	645,342
Notice pay expense	(500,463)	(500,463)	(177,009)	(2,279)
Total	(236,653,447)	(78,489,177)	(186,283,007)	(58,756,805)

31. OTHER INCOME/(EXPENSE), NET

Other income and expenses for the periods ended September 30, 2021 and 2020 are as follows:

	January 1- September 30, 2021	July 1 - September 30, 2021	January 1- September 30, 2020	July 1 - September 30, 2020
Other income:				<u> </u>
Other technical income	2,280,468	862,016	802,314	303,274
Other operating income	10,067	-	-	-
Other expense:				
Other operating expense	-	(26,705)	(2,961,714)	(446,964)
Intangible asset write-off	(70,129)	(12,639)	(4,483,171)	(4,483,171)
Other expense	(627,006)	(133,121)	(181,068)	532,254
Total other income / (expense), net	1,593,400	689,551	(6,823,639)	(4,094,607)

32. BLOCKED SECURITIES AND BANK DEPOSITS

The amounts below are deposited in a blocked account in favour of SEDDK. Accordingly the following guarantees have been issued to the Turkish Treasury based on the financial results:

	September 30, 2021	December 31, 2020
Blocked securities	2,835,974,311	2,005,765,878
Blocked bank deposits (*)	164,250,691	149,766,248
Total	3,000,225,002	2,155,532,126

^(*) Time deposits amounting to TL 2,500,000, financial assets with risks on policyholders, are not classified as cash and cash equivalents, so they do not appear as blocked deposits in the cash flow statement.

33. RELATED PARTY BALANCES AND TRANSACTIONS

Except for the related parties in the consolidated financial statements dated 30 September 2021 and 31 December 2020 and the relevant explanatory notes, companies that are related to Ageas Insurance International NV Group and Sabancı Holding as of 30 June 2021 are defined as other related parties.

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

33. RELATED PARTY BALANCES AND TRANSACTIONS (Continued)

As at September 30, 2021 and December 31, 2020 balances with related parties are as follows:

	September 30, 2021	December 31, 2020
Akbank T.A.Ş Credit card receivables	348,758,842	325,956,194
Other cash and cash equivalents	348,758,842	325,956,194
Akbank T.A.Ş Bank deposit	59,709,067	187,233,011
Banks	59,709,067	187,233,011

As of September 30, 2021 and December 31, 2020, The Group's portfolio of financial assets classified as held for trading and financial assets issued by related parties of the Group are as follows:

		September 30	, 2021	December 31, 2020
Other receivables from related nort	•aa			
Other receivables from related part Akbank T.A,Ş.	ies	2.5	72,379	
Aksigorta A.Ş.			12,319 40,904	1,024,260
Aksiguita A.Ş.		•	40,504	1,024,200
Total		2,6	13,283	1,024,260
		September 30	, 2021	December 31, 2020
Receivables from main operations				
Sabancı Üniversitesi		18	83,792	-
Çimsa Çimento Sanayi ve Ticaret A,Ş.	,		80,205	-
Kordsa Teknik Tekstil A.Ş.		5	82,096	(4,990)
Enerjisa Enerji Üretim A.Ş		(1,904)	940
Başkent Elektrik Dağıtım A.Ş		(2,750)	(12,945)
Brisa Bridgestone Sabancı Lastik ve Ticaret A.Ş		(11,014)		427
Other		<u> </u>	22,859	(1,069)
		4.	53,284	(17,637)
		30 Septembe	r 2021	
	Nominal value	Cost	Fair val	ue Book value
Private sector bond	110222242			2001 (11111
Enerjisa Elektrik Dağıtım A.Ş.	12,500,000	12,500,000	22,319,6	22,319,624
Çimsa Çimento Sanayi Ve Ticaret A,Ş,	13,500,000	13,500,000	13,567,6	13,567,650
Financial assets	26,000,000	26,000,000	35,887,2	35,887,274
		31 December	r 2020	
	Nominal value	Cost	Fair val	ue Book value
Private sector bonds	- 19			
Enerjisa Elektrik Dağıtım A.Ş.	12,500,000	12,500,000	19,694,7	82 19,694,782
Çimsa Çimento Sanayi Ve Ticaret A.Ş.	4,000,000	4,000,000	4,056,3	17 4,056,317
Financial assets	16,500,000	16,500,000	23,751,0	99 23,751,099

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

33. RELATED PARTY BALANCES AND TRANSACTIONS (Continued)

	September 30, 2021	December 31, 2020
Other payables to related parties		
Sabancı Dijital Teknoloji Hizmetleri A.Ş.	4,297,140	8,691,273
TeknoSA İç ve Dış Tic, A.Ş.	298,131	126,381
EnerjiSA Anadolu Yakası Elektrik Perakende Satış A.Ş.	49,731	80,931
Vista Turizm ve Seyahat A.Ş.	23,904	(4,529)
Carrefoursa Carrefour Sabancı Ticaret Merkezi A.Ş.	4,161	800,254
EnerjiSA Başkent Elektrik Perakende Satış A.Ş.	2,037	262
EnerjiSA Toroslar Elektrik Perakende Satış A.Ş.	1,547	-
Ak Portföy Yönetimi A.Ş.	-	945,100
Ak Sigorta A.Ş.	(66,465)	408,050
	4,610,186	11,047,722
	September 30, 2021	December 31, 2020
Advances given		
Vista Turizm ve Seyahat A.Ş.	785,688	687,573
	785,688	687,573
	September 30, 2021	December 31, 2020
Payables from main operations	*	,
Akbank T.A.Ş	57,343,640	29,117,799
Ak Portföy Yönetimi A.Ş.	3,497,793	5,686,009
Emeklilik Gözetim Merkezi A.Ş.	326,961	312,857
	61,168,394	35,116,665
	September 30, 2021	December 31, 2020
Income accruals for the month		24,000,202
Akbank T.A.Ş.	<u> </u>	24,088,392
	-	24,088,392
	September 30, 2021	December 31, 2020
Shareholders: Hacı Ömer Sabancı Holding	59,142	103,557
naci Oliei Savanci noiding	39,142	105,557
Payables to shareholders	59,142	103,557
Shareholders:		
Aviva International Holdings Ltd. (*)	547,351	547,351
Diğer	18,245	
Receivables from shareholders	565,596	547,351
ACCUTABLES ITOM SHALCHUIGUES	303,390	341,331

^(*) The Share Purchase Agreement was signed between Ageas Group and Aviva Group on 23 February 2021. Accordingly, Ageas agreed to take over all of AgeSA's shares with a nominal value of TL 72,000,006.72, representing 40% of the capital owned by Aviva. The closing conditions determined in the Share Purchase Agreement have been fulfilled, and all of Aviva's shares representing 40% of our Company's capital were taken over by Ageas as of 5 May 2021.

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

33. RELATED PARTY BALANCES AND TRANSACTIONS (Continued)

Transactions with related parties for the period ended September 30, 2021 and December 31, 2020 are as follows:

	January 1-	July 1 -	January 1-	July 1 -
	September 30, 2021	September 30, 2021	September 30, 2020	September 30, 2020
Services Purchased				
Akbank T.A.Ş.	342,837,036	145,206,778	211,161,067	133,187,564
- Commission paid	341,412,036	144,731,778	209,736,067	132,712,564
- Paid administrative expenses	1,425,000	475,000	1,425,000	475,000
Sabancı Dijital Teknoloji Hizmetleri A.Ş.	48,283,926	18,098,753	29,848,053	10,580,349
Ak Portföy Yönetimi A.Ş.	30,630,560	10,657,636	25,174,066	9,023,809
Emeklilik Gözetim Merkezi A.Ş.	3,489,010	1,157,208	2,819,567	945,705
AkSigorta A.Ş.	2,221,109	882,786	790,558	262,947
Anadolu Yakası Elektrik Dağıtım A.Ş.	620,868	167,917	680,864	202,910
Teknosa İç ve Dış Ticaret A.Ş.	351,538	102,049	412,410	184,910
Vista Turizm ve Seyahat A.Ş.	100,163	80,892	1,827,035	23,091
Other	674,545	344,801	732,249	127,227
	429,208,755	176,698,820	273,445,869	154,538,512
	January 1-	July 1 -	January 1-	July 1 -
	September 30, 2021		September 30, 2020	
T				
Financial income Akbank (interest income)	19,040,723	7,698,111	28,252,742	19,767,766
Çimsa Çimento San,ve Tic, A.Ş.	1,582,333	1,410,089	, ,	200,912
Enerjisa Enerji A.Ş.	700,000	700,000	,	425,500
Akyatırım	700,000	700,000	47,755	32,143
Akyaumii			41,133	32,143
	21,323,056	9,808,200	29,087,559	20,426,321
		* 1 4		
	January 1- September 30, 2021	July 1 -	January 1- September 30, 2020	July 1 -
	September 30, 2021	September 30, 2021	September 30, 2020	September 30, 2020
Services Provided				
Akbank T.A.Ş	10,994,889	3,661,961	-	-
Kordsa Teknik Tekstil A.Ş.	1,007,243	(12,524)	886,888	(8,370)
Brisa Bridgestone Sabancı Lastik ve Ticaret A.Ş	804,869	(1,710)	722,039	(4,431)
Başkent Elektrik Dağıtım A.Ş	596,520	(1,369)	550,105	(3,412)
Enerjisa Enerji Üretim A.Ş	432,012	(5,301)	392,002	5,162
Ak Yatırım Menkul değerler A.Ş	375,459	(1,895)	303,398	5,475
Akçansa Çimento Sanayi ve Ticaret A.Ş.	336,375	(5,922)	279,165	234
Toroslar Elektrik Dağıtım A.Ş.	333,583	3,994	276,798	(19,835)
AkSigorta A.Ş.	332,005	(125)	286,351	223
Çimsa Çimento Sanayi ve Ticaret A.Ş.	317,325	1,955	361,659	(196)
	295,266	1,867	247,529	1,121
Temsa Ulaşım Araçları Sanayi ve Ticaret A.Ş.			202,525	
Sabancı Dijital Teknoloji Hizmetleri A.Ş.	257,533	920	203,787	1,753
Sabancı Dijital Teknoloji Hizmetleri A.Ş. TeknoSA İç ve Dış Ticaret A.Ş.	257,533 237,956	920 2,229	209,873	(1,443)
Sabancı Dijital Teknoloji Hizmetleri A.Ş. TeknoSA İç ve Dış Ticaret A.Ş. İstanbul Anadolu yakası Elektrik Dağıtım A.Ş.	257,533 237,956 197,566	920 2,229 1,276	209,873 182,781	(1,443) (413)
Sabancı Dijital Teknoloji Hizmetleri A.Ş. TeknoSA İç ve Dış Ticaret A.Ş. İstanbul Anadolu yakası Elektrik Dağıtım A.Ş. Ak Portföy Yönetimi A.Ş	257,533 237,956	920 2,229	209,873	(1,443)
Sabancı Dijital Teknoloji Hizmetleri A.Ş. TeknoSA İç ve Dış Ticaret A.Ş. İstanbul Anadolu yakası Elektrik Dağıtım A.Ş. Ak Portföy Yönetimi A.Ş CarrefourSA Carrefour Sabancı Ticaret Merkezi	257,533 237,956 197,566 181,270	920 2,229 1,276 (238)	209,873 182,781 153,508	(1,443) (413) 1,065
Sabancı Dijital Teknoloji Hizmetleri A.Ş. TeknoSA İç ve Dış Ticaret A.Ş. İstanbul Anadolu yakası Elektrik Dağıtım A.Ş. Ak Portföy Yönetimi A.Ş CarrefourSA Carrefour Sabancı Ticaret Merkezi A.Ş.	257,533 237,956 197,566 181,270	920 2,229 1,276 (238) 814	209,873 182,781 153,508	(1,443) (413) 1,065
Sabancı Dijital Teknoloji Hizmetleri A.Ş. TeknoSA İç ve Dış Ticaret A.Ş. İstanbul Anadolu yakası Elektrik Dağıtım A.Ş. Ak Portföy Yönetimi A.Ş CarrefourSA Carrefour Sabancı Ticaret Merkezi	257,533 237,956 197,566 181,270	920 2,229 1,276 (238)	209,873 182,781 153,508	(1,443) (413) 1,065

Benefits provided to executive management

For the period ended September 30, 2021 and 2020, wages and other benefits provided to Chairman and members of the Board of Directors, general manager, general coordinator, senior managers and assistant general managers are TL 12,835,700 (July 1- September 30, 2021: TL 3,242,536) and TL 9,664,275 (July 1- September 30, 2020: TL 2,878,689) respectively.

NOTES TO THE CONSOLIDATED FINANCIAL INFORMATIONS FOR THE PERIOD ENDED SEPTEMBER 30, 2021

(Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

34. CONTINGENCIES

Provision for lawsuits

Provision for lawsuits against the Group is classified under other provision and claims provision.

As at September 30, 2021 and December 31, 2020; provisions for lawsuits against the Group are as follows:

	September 30, 2021	December 31, 2020
Lawsuits provision under other provision:	11,129,864	11,366,186
Insurance lawsuits against the Group	6,466,007	5,995,183
Other lawsuits against the Group	2,630,293	2,630,293
Business lawsuits against the Group	2,033,564	2,740,710
Lawsuits provision under claims provision	35,545,480	34,459,548
Total lawsuits provision	46,675,344	45,825,734

35. COMMITMENTS

As at September 30, 2021 and December 31, 2020, total insurance risk accepted by the Group under normal courses of the insurance business is detailed in Note 4.

As at September 30, 2021 and December 31, 2020, letters of guarantee given to suppliers and government institutions are as follows:

	September 30, 2021	December 31, 2020
Letters of guarantee	9,758,186	9,217,397
Total	9,758,186	9,217,397

36. SUBSEQUENT EVENTS

The Group's consolidated financial informations as of 30 September 2021 is approved at 27 October 2021 by the Board of Directors.

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