AVİVASA EMEKLİLİK VE HAYAT ANONİM ŞİRKETİ

CONSOLIDATED FINANCIAL STATEMENTS AS OF DECEMBER 31, 2020 AND INDEPENDENT AUDITOR'S REPORT



INDEPENDENT AUDITOR'S REPORT

To the Board of Directors of AvivaSA Emeklilik ve Hayat A.Ş.

Report on the audit of the consolidated financial statements

Our opinion

In our opinion, the consolidated financial statements present fairly, in all material respects, the consolidated financial position of AvivaSA Emeklilik ve Hayat A.Ş. ("the Company") and its subsidiary ("collectively referred as the "Group") as at 31 December 2020, and its consolidated financial performance and its consolidated cash flows for the year then ended in accordance with International Financial Reporting Standards ("IFRS").

What we have audited

The Group's financial statements comprise:

- the consolidated statement of financial position as at 31 December 2020;
- the consolidated statement of income for the year then ended;
- the consolidated statement of comprehensive income for the year then ended;
- the consolidated statement of changes in equity for the year then ended;
- the consolidated statement of cash flows for the year then ended; and
- the consolidated notes to the financial statements, which include a summary of significant accounting policies.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing ("ISAs"). Our responsibilities under those standards are further described in the Auditor's responsibilities for the audit of the consolidated financial statements section of our report.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.



Independence

We are independent of the Group in accordance with the International Ethics Standards Board for Accountants' Code of Ethics for Professional Accountants ("IESBA Code") and "Independence Audit by-Law" published by the Public Oversight Accounting and Auditing Standards Authority ("POA") and independent auditing requirements referred to in Article 400 of the Turkish Commercial Code ("TCC") (collectively referred to as "Turkish Local Independence Rules"). We have fulfilled our other ethical responsibilities in accordance with IESBA Code and Turkish Local Independence Rules.

Our audit approach

As part of designing our audit, we determined materiality and assessed the risks of material misstatement in the consolidated financial statements. In particular, we considered where management made subjective judgements; for example, in respect of significant accounting estimates that involved making assumptions and considering future events that are inherently uncertain. As in all of our audits, we also addressed the risk of management override of internal controls, including among other matters, consideration of whether there was evidence of bias that represented a risk of material misstatement due to fraud.

We tailored the scope of our audit in order to perform sufficient work to enable us to provide an opinion on the consolidated financial statements as a whole, taking into account the structure of the Group, the accounting processes and controls, and industry in which the Group operates.

Key audit matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the consolidated financial statements of the current period. These matters were addressed in the context of our audit of the consolidated financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters



Key audit matter

Measurement of carrying value of intangible assets

As explained in Notes 2, 3 and 8, as of 31 December 2020 capitalized costs amounting to TL 93.7 million were attributable to projects which were accounted for under intangible assets and consisted of mainly costs that were incurred for the modernization of core insurance information technology systems. Such costs include both internal personnel costs and externally provided services/licenses.

Since the measurement of the carrying value of these intangible assets requires advanced technical assessment and judgement based on IFRS, we identified this subject as a key audit matter.

How our audit addressed the key audit matter

Design and operational effectiveness of the key controls for the processes of internal development and external purchase of intangible assets were tested. As of 31 December 2020, externally provided services in the amount of 66.7 million TL and internal developed assets in the amount of 27 million TL are tracked on project basis and the mathematical accuracy of these project based intangible assets was controlled. We performed inquiries with the Management, evaluated the methods and assumptions used by them, assessed by using project-based sampling methods whether these costs can be capitalized under IFRS and if there is need for impairment.

Completeness and accuracy of internally developed intangible assets were tested through the test of the internal development process. In addition to that, we have obtained the detailed listing of all internally developed projects including capitalized personnel expenses and validated the timesheets and respective salary costs of employees for the projects sampled.

Consolidated financial statement disclosures relating to these intangible assets were controlled.



Key audit matter	How our audit addressed the key audit matter
Estimations and assumptions used in	
calculation of mathematical reserves	As of 31 December 2020, we tested the design
arising from insurance contracts	and operational effectiveness of the key controls
	implemented by the Group's management in
As explained in Notes 2 and 17, as of	relation to the calculation of mathematical
31 December 2020, the Group's total net	reserves. The mathematical reserves were
mathematical reserves amounted to	recalculated by the expert actuaries in our audit
TRY 2,262 million and this amount constitutes an	team using the sampling method under
important part of the total liabilities of the Group.	consideration of the approved tariffs and other
The measurement of mathematical reserves	related calculation data. The compliance of the
requires significant estimates and assumptions, as	explanatory information related to these reserves
it includes results for future uncertain events,	with related IFRSs has been examined.
including benefits guaranteed to the insured.	
The mathematical reserves are considered as the	
subject of a key audit matter by us, due to their	
importance for the consolidated financial	
statements and the important assumptions related	
to their recognition.	

Responsibilities of management and those charged with governance for the consolidated financial statements

Management is responsible for the preparation and fair presentation of the consolidated financial statements in accordance with IFRS, and for such internal control as management determines is necessary to enable the preparation of consolidated financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the consolidated financial statements, management is responsible for assessing the Group's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Group or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the Group's financial reporting process.



Auditor's responsibilities for the audit of the consolidated financial statements

Our objectives are to obtain reasonable assurance about whether the consolidated financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with ISAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these consolidated financial statements.

As part of an audit in accordance with ISAs, we exercise professional judgment and maintain professional scepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the consolidated financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Group's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the consolidated financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Group to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the consolidated financial statements, including the disclosures, and whether the consolidated financial statements represent the underlying transactions and events in a manner that achieves fair presentation.



We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the consolidated financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

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

Adnan Akan, SMMM Partner

Istanbul, 8 February 2021

AVİVASA EMEKLİLİK VE HAYAT ANONİM ŞİRKETİ

THE CONSOLIDATED FINANCIAL REPORT FOR THE YEAR ENDED 31 DECEMBER 2020

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, 8 Feb 2021

M. Fırat Kuruca

Member of the Board of

Directors, General Manager

Erkan Şahinler

Assistant General Manager Group Manager

Finance

Accounting&Finance

Actuary

AvivaSA: Şirkete Özel (Internal)

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NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020 (Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

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CONSOLIDATED STATEMENT OF FINANCIAL POSITION FOR THE PERIOD **ENDED**

DECEMBER 31, 2020 AND DECEMBER 31, 2019 (Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

			Restated (Note 1.1)
Assets	Note	December 31,2020	December 31,2019
Cash and cash equivalents	5	994.041.049	398,527,876
Financial assets	6	2,229,963,493	1,771,746,764
Premium and other insurance receivables	8	35,330,094	37,011,109
Reinsurance share of insurance liabilities	7.21	10,949,619	15,815,927
Deferred expenses	19	524,525,316	478,231,925
Other financial assets	13	868,012	868,012
Pension business receivables	9	197,580,785	212,976,185
Right of use assets	11	26,194,006	32,890,742
Property and equipment, net	11	26,571,545	27,435,735
Intangible assets, net	12		
Other assets	12	93,797,549	58,535,130
Other assets	10	40,668,444	9,720,417
Total assets		4,180,489,912	3,043,759,822
T to be the control of the control o			
Liabilities			
Lease liabilities	14	30,342,375	35,733,545
Due to insurance and reinsurance companies	15	32,213,493	43,940,869
Pension business payables	9	520,044,530	486,090,486
Insurance contract liabilities	21	2,211,385,128	1,443,817,209
Provision for employment termination benefits	18	21,040,315	15,971,826
Deferred tax liabilities	17	94,352,699	71,023,837
Current tax liabilities	17	13,368,352	11,437,773
Other payables and liabilities	20	128,998,804	46,051,457
Other provisions	16	52,836,084	37,758,216
Total liabilities		3,104,581,780	2,191,825,218
G1 '. 1	22	100 000 000	100,000,000
Share capital	22	180,000,000	180,000,000
Items that may be reclassified to profit or loss	22	26 602 000	(204.002)
Fair value reserves from available for sale assets	22	36,602,809	(294,093)
Other capital reserves	22	837,095	837,095
Profit reserves	22	190,370,612	135,728,079
Retained earnings	22	318,459,643	278,131,574
Profit for the period	23	349,637,973	257,531,949
Equity attributable to the owners of the Group		1,075,908,132	851,934,604
Total equity and liabilities		4,180,489,912	3,043,759,822

CONSOLIDATED STATEMENT OF INCOME FOR THE PERIOD ENDED DECEMBER 31, 2020 AND DECEMBER 31, 2019 (Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

			Restated
			(Note 1.1)
	Note	January 1 - December 31, 2020	January 1 - December 31, 2019
Income:			
Gross written premiums	24	1,331,872,294	987,754,213
Premium ceded to reinsurers	24	(18,449,424)	(27,565,423)
Premium written net of reinsurance	24	1,313,422,870	960,188,790
Net change in provision for unearned premiums reserves		27,674,865	25,258,356
Net premiums earned		1,341,097,735	985,447,146
Net change in mathematical reserves		(477,941,511)	(405,321,777)
Income generated from pension business	25	453,380,575	364,809,225
Investment and other income	28	158,887,318	162,911,205
Commission income	27	10,878,811	11,217,587
Foreign exchange gains/(losses), net	26	1,640,503	2,900,810
Total income		1,487,943,431	1,121,964,196
Expenses:			
Claims paid and change in outstanding claims provisions	21	(219,069,922)	(123,839,160)
General and administrative expenses	30	(436,112,418)	(357,530,811)
Pension expenses including commission	29	(167,059,986)	(122,017,272)
Commission expense	27	(208,175,917)	(181,956,479)
Other (expense)/income, net	31	(6,223,796)	(3,534,465)
Total expenses		(1,036,642,039)	(788,878,187)
Profit before taxes		451,301,392	333,086,009
Income tax expense (-)	17	(101,663,419)	(75,554,060)
Profit for the period		349,637,973	257,531,949
Earnings per share			
(TL 0.01 nominal value per share)	23	0.0194	0.0143
** *** *** *** *** *** *** *** *** ***	-		****

CONSOLIDATED STATEMENT OF COMPREHENSIVE INCOME FOR THE PERIOD ENDED DECEMBER 31, 2020 AND DECEMBER 31, 2019 (Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

		Restated (Note 1.1)
	January 1 –December 31,	January 1 - December 31,
N	ote 2020	2019
Profit for the year	349,637,973	257,531,949
Other comprehensive income:		
Items that may be reclassified subsequently to profit or		
(loss):		
Net gain/(loss) on available	45,000,045	40,000,000
for-sale assets	46,329,345	49,803,988
Deferred tax relating to components of other comprehensive income	(9,432,443)	(10,956,877)
nicone	(2,132,113)	(10,220,077)
Net other comprehensive income/(loss) that may be		
reclassified to profit or loss in subsequent years	36,896,902	38,847,111
T441.4.211411		
Items that will not be reclassified subsequently to profit or loss:		
Actuarial gain/ (loss) on employee termination benefits	(3,201,682)	(5,177,327)
Deferred tax relating to actuarial	(3,201,002)	(3,177,327)
gain/ (loss)	640,335	1,139,012
Net other comprehensive gain/ (loss) not being	(2.5(1.248)	(4.020.215)
reclassified to profit or loss in subsequent years	(2,561,347)	(4,038,315)
Other comprehensive income / (loss), net of tax	34,335,555	34,808,796
Total comprehensive income, net of tax	383,973,528	292,340,745

CONSOLIDATED STATEMENT OF CHANGES IN EQUITY FOR THE PERIOD ENDED DECEMBER 31, 2020 AND DECEMBER 31, 2019

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

			Other conitel	Items that may be reclassified to profit or loss/ Fair value reserves for available for			Profit for the	
	Note	Share capital	reserves	- sale financial assets	Profit reserves	Retained earnings	period	Total
Balances at January 1, 2019 - as previously stated	11000	180,000,000	837,095	(39,141,204)	44,498,235	242,623,147	200,564,104	629,381,377
ROP DAC impact (*)		-	-	-	-	17,339,743	12,872,739	30,212,482
Balances at January 1, 2019 (as restated)		180,000,000	837,095	(39,141,204)	44,498,235	259,962,890	213,436,843	659,593,859
Profit for the period		-	-	-	-	-	257,531,949	257,531,949
Other comprehensive loss	22	-	-	38,847,111	-	(4,038,315)	-	34,808,796
Total comprehensive income		-	-	38,847,111	-	(4,038,315)	257,531,949	292,340,745
Transfer	22	_	_	-	91,229,844	122,206,999	(213,436,843)	_
Dividend payment	22	-	-	-		(100,000,000)	-	(100,000,000)
Balance at December 31, 2019		180,000,000	837,095	(294,093)	135,728,079	278,131,574	257,531,949	851,934,604
				Items that may be reclassified to profit or				
			Other capital	loss/ Fair value reserves for available for	Profit		Profit for the	
	Note	Share capital	reserves	- sale financial assets	reserves	Retained earnings	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 (*)						30,212,482	16,994,999	47,207,481
Balances at January 1, 2020 (as restated)		180,000,000	837,095	(294,093)	135,728,079	278,131,574	257,531,949	851,934,604
Profit for the period							349,637,973	349,637,973
Other comprehensive income	22			36,896,902		(2,561,347)		34,335,555
Total comprehensive income				36,896,902		(2,561,347)	349,637,973	383,973,528
Transfer	22				54,642,533	202,889,416	(257,531,949)	_
Dividend payment	22				2 .,012,000	(160,000,000)	(==:,001,010)	(160,000,000)

^(*) Disclosed in Note 1.1.

CONSOLIDATED STATEMENT OF CASH FLOWS FOR THE PERIOD ENDED DECEMBER 31, 2020 AND DECEMBER 31, 2019 (Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

			(Restated Note 1.1)
	Note	January 1 - December 31, 2020	January 1 - December 31, 2019
Cash flows from operating activities:			,
Profit for the period		349,637,973	257,531,949
Income taxes	17	101,663,419	75,554,060
Depreciation and amortization	30	39,430,982	30,801,197
Interest income		(139,638,791)	(106,139,056)
Unrealized exchange rates (gains) / losses from cash and cash equivalents	_	17,323,178	(3,620,489)
Unrealized Exchange rates (gains) / losses from financial assets	6	68,019,725	(103,232,880)
Fair value changes in marketable securities Change in claims provision	6 21	(48,832,854)	15,733,128 124,854,461
Change in life mathematical reserves	21	217,961,966 772,266,590	549,567,459
Change in provision for unearned premiums reserves	21	(30,946,246)	(23,278,138)
Change in provision for employment termination benefits	18	3,891,654	8,171,211
Intangible asset write off adjustment	12	4,483,171	
Change in blockage	5	(172,479,608)	125,854,744
	-		
Operating profit before changes in operating assets / liabilities		1,182,781,159	951,797,646
Changes in operating assets and liabilities:			
Change in premium and other insurance receivables	7,8	6,547,323	(3,138,877)
Change in other assets	10	(30,948,027)	2,785,223
Change in deferred expenses	19	(46,293,391)	(53,408,124)
Change in pension business receivables	9	15,395,400	(16,797,863)
Change in pension business payables	9	33,954,044	(9,422,900)
Change in lease liabilities		1,026,263	(50.04.5.054)
Corporate taxes paid	2.1	(84,566,972)	(62,916,371)
Cash paid for claims settled during the year, net	21	(200,748,481)	(127,324,722)
Employment termination benefits paid Change in other liabilities	18	(2,024,847)	(4,134,244)
Change in other nationales		26,178,970	18,570,176
Net cash provided from / (used in) operating activities		901,301,441	696,009,944
Cash flows from investing activities:			
Acquisition of property and equipment	11	(7,550,914)	(5,281,630)
Disposal of property and equipment	11	76,761	-
Acquisition of intangible assets	12	(60,587,480)	(28,916,560)
Proceeds from sale of property and equipment	11	-	4,135
Purchases of financial assets	6	(6,063,378,645)	(5,380,630,263)
Proceeds from sale of financial assets	6	5,640,828,235	4,608,392,274
Interest received	28	146,319,611	106,139,056
Net cash provided by investing activities		(344,292,432)	(700,292,988)
Dividend payment		(100,000,000)	(91,157,185)
Paid rent for lease liabilities	14	(16,960,928)	(14,098,485)
Net cash provided by/(used in) financing activities		(116,960,928)	(105,255,670)
Effect of exchange rates on cash and cash equivalents		(17,323,178)	3,620,489
Net increase in cash and cash equivalents		422,724,903	(105,918,225)
Cash and cash equivalents at the beginning of the year		280,374,522	386,292,747
Cash and cash equivalents at the end of the period		703,099,425	280,374,522

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020 AND DECEMBER 31, 2019

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

1. GENERAL INFORMATION

1.1 Restatement to Prior Year Financial Statements

The Group reviewed its accounting policy regarding deferred acquisition costs for Return of Premium products ("ROP") and concluded on a change with effect from 1 January 2019. Up until 31 December 2018, the Group did not include the up-front commissions for ROP products produced by all channels in its deferred acquisition costs. Starting from 2019, it is agreed that these up-front commissions are also within the scope of "IFRS 4 Insurance Contracts". However, due to the limitation of sufficient data relevant for previous periods related to agency and sales personnel commissions, the Company decided to defer the bank channel commissions only as of 31 March 2019. Such decision resulted in a change in accounting policy. As such comparative consolidated financial statements needed to be restated. However, on the grounds of materiality, the retrospective treatment of the change in accounting policy for bank channel commissions was reflected to the opening balances at 1 January 2019 only.

As of 31 March 2020, the Group added agency and sales personnel commissions in its deferred acquisition cost base for purposes of fairer presentation of the financial statements. The effect of this change was recognized retrospectively in the consolidated financial statements. As such comparative interim consolidated financial statements have been restated.

Restated balances for balance sheet and profit/loss statement is stated below:

	Previously	Effect of	_
1 January 2019	Reported	Restatement	Restated
Deferred expenses	391,886,318	38,733,951	430,620,269
Deferred tax liabilities	38,640,075	8,521,469	47,161,544
Total Assets	2,192,416,957	38,733,951	2,231,150,908
Total Liabilities	1,571,295,743	8,521,469	1,579,817,212
Net Profit (Loss) for the Period	200,564,104	12,872,739	213,436,843
Retained Earnings	242,623,147	17,339,743	259,962,890
Shareholders' Equity	629,381,377	30,212,482	659,593,859
	Previously	Effect of	
31 December 2019	Reported	Restatement	Restated
Deferred expenses	417,709,514	60,522,411	478,231,925
Deferred tax liabilities	57,708,907	13,314,930	71,023,837
Total Assets	2,983,237,411	60,522,411	3,043,759,822
Total Liabilities	2,178,510,288	13,314,930	2,191,825,218
Net Profit (Loss) for the Period	240,536,950	16,994,999	257,531,949
Retained Earnings	247,919,092	30,212,482	278,131,574
Shareholders' Equity	804,727,123	47,207,481	851,934,604
	Previously	Effect of	
1 January – 31 December 2019	Reported	Restatement	Restated
General and administrative expenses	(368,697,531)	11,166,720	(357,530,811)
Commission expense	(192,578,219)	10,621,740	(181,956,479)
Income tax expense (-)	(70,760,599)	(4,793,461)	(75,554,060)
Profit before taxes	311,297,549	21,788,460	333,086,009
Profit for the period	240,536,950	16,994,999	257,531,949
Earnings / (Loss) per Share	0.0134	0.0009	0.0143

NOTES TO CONSOLIDATED FINANCIAL STATEMENTS AS AT DECEMBER 31, 2020

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

1. GENERAL INFORMATION (Continued)

1.2 Corporate Information

AvivaSA Emeklilik ve Hayat 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).

The main shareholders of the Company are Aviva Europe SE and Hacı Ömer Sabancı Holding A.Ş. The Company operates as a joint venture. Aviva Europe SE and Hacı 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 AvivaSA Emeklilik ve Hayat A.Ş. 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 AvivaSA Emeklilik ve Hayat A.Ş. 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, Treasury and Finance Ministry 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 December 31, 2020 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 registered office of the Company is Saray Mahallesi Dr. Adnan Büyükdeniz Caddesi No: 12, 34768 Ümraniye, Istanbul - Turkey.

The consolidated financial statements of the Company as at and for the period ended December 31, 2020 comprises the Company and its subsidiary (together referred to as the "Group" and individually as "Group Entities").

The subsidiary; AvivaSA Sigorta Aracılığı A.Ş. has been approved in AvivaSA Hayat ve Emeklilik 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.

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

Küçükbakkalköy Mah. Kayışdağı Cad. Sevda Sokak No:1 (Seven Towers) Kat: 2 Daire: 2 Ataşehir/İstanbul

AvivaSA Sigorta ve Aracılığı A.Ş.acts as an agent for non-life insurance policies including health 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 1,378 employees for the period ended December 31, 2020 (1 January - December 31, 2019: 1,429).

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

1. GENERAL INFORMATION (Continued)

1.2 Corporate Information (Continued)

The accompanying consolidated financial statements of the Group for the year ended December 31, 2020 were authorized for issue in accordance with a resolution of the directors on February 8, 2021.

As of December 31, 2020, there are 35 pension investment funds established by the Group (December 31, 2019: 35 pension funds). The pension investment funds established by the Group are as follows:

Name of Pension Fund	Date of Establishment
AvivaSA Emeklilik Ve Hayat A.Ş. Karma Emeklilik Yatırım Fonu	21 October 2003
AvivaSA Emeklilik Ve Hayat A.Ş. Agresif Değişken Emeklilik Yatırım Fonu	21 October 2003
AvivaSA Emeklilik Ve Hayat A.Ş. Dış Borçlanma Araçları Emeklilik Yatırım Fonu	21 October 2003
AvivaSA Emeklilik Ve Hayat A.Ş. Orta Vadeli Borçlanma Araçları Emeklilik Yatırım Fonu	21 October 2003
AvivaSA Emeklilik Ve Hayat A.Ş. İkinci Para Piyasası Emeklilik Yatırım Fonu	21 October 2003
AvivaSA Emeklilik Ve Hayat A.Ş. İkinci Değişken Emeklilik Yatırım Fonu	21 October 2003
AvivaSA Emeklilik Ve Hayat A.Ş. Uzun Vadeli Kamu Dış Borçlanma Araçları Emeklilik Yatırım Fonu	8 November 2005
AvivaSA Emeklilik Ve Hayat A.Ş. Temettü Ödeyen Şirketler Hisse Senedi 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 January2005
AvivaSA Emeklilik Ve Hayat A.Ş. Muhafazakar Değişken Emeklilik Yatırım Fonu	5 January2005
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. B.R.I.C Ülkeleri 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.Ş. 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	26 May 2017
AvivaSA Emeklilik ve Hayat A.Ş. OKS Standart Emeklilik Yatırım Fonu	2 January2018
AvivaSA Emeklilik ve Hayat A.Ş. OKS Katılım Standart Emeklilik Yatırım Fonu	2 January2018

With the Board of Directors Decision dated 7 May 2020, a decision regarding the establishment of the AvivaSA Emeklilik ve Hayat A.Ş. Dengeli Fon Sepeti Emeklilik Yatırım Fonu, AvivaSA Emeklilik ve Hayat A.Ş. Dinamik Fon Sepeti Emeklilik Yatırım Fonu and AvivaSA Emeklilik ve Hayat A.Ş. Temkinli Fon Sepeti Emeklilik Yatırım Fonu has been taken and the establishment works are continuing.

With the decision of the Board of Directors dated 27 October 2020 and with the permission decision of CMB for the AvivaSA Emeklilik ve Hayat A.Ş. 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 Emeklilik ve Hayat A.Ş. Uzun Vadeli Dış Borçlanma Araçları Emeklilik Yatırım Fonu to AvivaSA Emeklilik ve Hayat A.Ş. 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 Emeklilik ve Hayat A.Ş. 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 Emeklilik ve Hayat A.Ş. B.R.I.C Ülkeleri Yabancı Değişken Emeklilik Yatırım Fonu to AvivaSA Emeklilik ve Hayat A.Ş. Yeni Teknolojiler Yabancı Değişken Emeklilik Yatırım Fonu and the change of the fund type will come into force as of February 5, 2021.

NOTES TO CONSOLIDATED FINANCIAL STATEMENTS AS AT DECEMBER 31, 2020

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

1. GENERAL INFORMATION (Continued)

1.2 Corporate Information (Continued)

With the decision of the Board of Directors dated 27 October 2020 and with the permission decision of CMB for the AvivaSA Emeklilik ve Hayat A.Ş. Temettü Ödeyen Şirketler Hisse Senedi Emeklilik Yatırım Fonu dated 11/12/2020 and numbered E-122933903-325.0103-12696, the title of AvivaSA Emeklilik ve Hayat A.Ş. Temettü Ödeyen Şirketler Hisse Senedi Emeklilik Yatırım Fonu to be changed to AvivaSA Emeklilik ve Hayat A.Ş. BİST Temettü 25 Endeksi Emeklilik Yatırım Fonu and the change in the fund type will come into force as of 05/02/2021.

As at December 31, 2020 and December 31, 2019 units and amounts of share certificates in circulation are as follows:

	December 31, 2020		December	31, 2019
	Number of		Number of	
	Share	Net Asset	Share	Net Asset
Share certificates in circulation	Certificates	Value (TL)	Certificates	Value (TL)
AvivaSA Emeklilik ve Hayat A.Ş.Karma Emeklilik Yatırım Fonu	735,071,945	56,227,858	919,780,373	61,893,861
AvivaSA Emeklilik ve Hayat A.Ş.Agresif Değişken Emeklilik Yatırım Fonu	1,059,512,876	91,226,178	1,224,191,665	83,885,285
AvivaSA Emeklilik ve Hayat A.Ş. Dış Borçlanma Araçları Emeklilik Yatırım	-,,,	, -,,	-,,	,,
Fonu	25,643,370,957	2,847,670,701	25,574,352,579	2,088,810,821
AvivaSA Emeklilik ve Hayat A.ŞOrta Vadeli Borçlanma Araçları	-,,,	,,,-	- , , ,	,,.
Emeklilik Yatırım Fonu	1,933,916,637	146,552,203	2,570,204,158	178,092,016
AvivaSA Emeklilik ve Hayat A.Şİkinci Para Piyasası Emeklilik Yatırım Fonu	1,657,064,489	111,132,687	2,269,124,573	137,792,590
AvivaSA Emeklilik ve Hayat A.Sİkinci Değişken Emeklilik Yatırım Fonu	4,295,383,861	240,751,970	2,996,048,181	131,853,084
AvivaSA Emeklilik ve Hayat A.ŞUzun Vadeli Kamu Dış Borçlanma Araçları	, , ,	.,,	, , , .	- ,,
Emeklilik Yatırım Fonu	24,386,450,173	2,533,093,739	22,319,183,776	1,689,874,680
AvivaSA Emeklilik ve Hayat A.S.Temettü Ödeyen Sirketler	,,,	,,,	,,,	,,,
Hisse Senedi Emeklilik Yatırım Fonu	1,654,135,899	91,405,896	1,545,678,790	61,496,376
AvivaSA Emeklilik ve Hayat A.Ş.Birinci Para Piyasası Emeklilik	, ,,	,,	, , ,	. , ,
Yatırım Fonu	39,875,098,015	2,840,941,233	44,560,624,084	2,877,858,785
AvivaSA Emeklilik ve Hayat A.SBorçlanma Araçları Emeklilik Yatırım Fonu	38,755,798,162	2,873,858,701	44,963,909,999	3,042,977,573
AvivaSA Emeklilik ve Hayat A.ŞDinamik Değişken Emeklilik Yatırım Fonu	27,532,739,952	2,419,962,645	31,197,177,070	2,257,864,493
AvivaSA Emeklilik ve Hayat A.Ş.Birinci Değişken Emeklilik Yatırım Fonu	18,588,114,111	1,383,736,391	18,890,575,604	1,089,476,167
AvivaSA Emeklilik ve Hayat A.Ş.Hisse Senedi Emeklilik Yatırım Fonu	15,113,731,517	1,571,843,192	14,276,379,004	1,137,113,588
AvivaSA Emeklilik ve Hayat A.Ş.Borçlanma Araçları Grup Emeklilik				
Yatırım Fonu	5,044,760,691	318,611,951	6,000,565,928	341,798,236
AvivaSA Emeklilik ve Hayat A.ŞMuhafazakar Değişken Emeklilik				
Yatırım Fonu	2,138,467,880	148,685,533	2,671,654,722	167,186,809
AvivaSA Emeklilik ve Hayat A.ŞHisse Senedi Grup Emeklilik Yatırım Fonu	1,339,619,319	139,845,540	1,487,617,507	117,555,998
AvivaSA Emeklilik ve Hayat A.Ş.Karma Grup Emeklilik Yatırım Fonu	1,019,832,900	30,209,490	1,223,066,798	31,599,154
AvivaSA Emeklilik ve Hayat A.Ş.Dengeli Değişken Emeklilik Yatırım Fonu	327,146,863	8,726,315	298,504,533	6,733,964
AvivaSA Emeklilik ve Hayat A.ŞKatkı Emeklilik Yatırım Fonu	185,137,728,419	3,639,252,328	171,874,805,093	3,031,184,063
AvivaSA Emeklilik ve Hayat A.ŞStandart Emeklilik Yatırım Fonu	10,754,076,849	202,961,692	12,758,499,674	215,848,297
AvivaSA Emeklilik ve Hayat A.Ş.Altın Emeklilik Yatırım Fonu	153,307,402,012	7,463,157,637	109,028,024,914	3,389,790,323
AvivaSA Emeklilik ve Hayat A.Ş.B.R.I.C Ülkeleri Yabancı				
Değişken Emeklilik Yatırım Fonu	4,145,922,080	183,411,447	4,325,544,077	157,653,105
AvivaSA Emeklilik ve Hayat A.Ş.Özel Sektör Borçlanma				
Araçları Emeklilik Yatırım Fonu	3,267,547,474	78,192,411	2,180,121,926	46,868,261
AvivaSA Emeklilik ve Hayat A.Ş.Başlangıç Emeklilik Yatırım Fonu	4,290,174,844	74,837,810	5,474,213,980	86,186,025
AvivaSA Emeklilik ve Hayat A.ŞBaşlangıç Katılım Emeklilik Yatırım Fonu	3,019,542,473	50,145,542	4,407,819,172	66,231,891
AvivaSA Emeklilik ve Hayat A.Ş.OKS Dinamik Katılım Değişken EYF	451,972,660	9,089,622	231,060,160	3,384,338
AvivaSA Emeklilik ve Hayat A.Ş. OKS Agresif Katılım Değişken EYF	702,528,596	15,910,165	196,605,779	2,911,338
AvivaSA Emeklilik ve Hayat A.Ş.OKS Muhafazakar Değişken EYF	599,506,315	9,260,574	404,753,636	5,617,576
AvivaSA Emeklilik ve Hayat A.Ş. OKS Dengeli Değişken EYF	707,473,424	11,248,120	363,266,002	4,865,585
AvivaSA Emeklilik ve Hayat A.Ş. OKS Dinamik Değişken EYF	804,388,912	12,871,027	361,063,887	4,776,153
AvivaSA Emeklilik ve Hayat A.Ş. OKS Agresif Değişken EYF	1,040,921,238	16,315,399	424,502,584	5,314,348
AvivaSA Emeklilik ve Hayat A.Ş. OKS Standart Emeklilik Yatırım Fonu	35,772,782,543	530,438,820	30,041,107,993	394,349,625
AvivaSA Emeklilik ve Hayat A.Ş. OKS Katılım Standart Emeklilik				
Yatırım Fonu	18,010,785,501	289,595,420	14,557,251,183	201,268,555
AvivaSA Emeklilik ve Hayat A.Ş. Katılım Katkı Emeklilik Yatırım Fonu	878,427,920	13,953,828	1,732,990	21,969
AvivaSA Emeklilik ve Hayat A,Ş, Katılım Standart Emeklilik Yatırım Fonu	335,911	6,654	392,847	5,994
	633,991,733,418	30,455,130,719	581,619,405,241	23,120,140,926

	December 3	1, 2020	December 3	31, 2019
Participation certificates at the Group	Number of Share Certificates	Net Asset Value (TL)	Number of Share Certificates	Net Asset Value (TL)
AvivaSA Emeklilik ve Hayat A.Ş. Katılım Standart EYF	38,933,510	771,273	38,988,726	594,852
	38,933,510	771,273	38,988,726	594,851

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

2. ACCOUNTING POLICIES

2.1 Basis of preparation

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

Subsidiary

Subsidiary is the entity controlled by the Group. The consolidated financial statements of the subsidiary is included in the consolidated financial statements 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 statements.

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 STATEMENTS AS AT DECEMBER 31, 2020

(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 statement 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 statement 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 2019: 8 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.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

2. ACCOUNTING POLICIES (Continued)

2.3 Summary of significant accounting policies (Continued)

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.

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 statement 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.

NOTES TO CONSOLIDATED FINANCIAL STATEMENTS AS AT DECEMBER 31, 2020

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

2. ACCOUNTING POLICIES (Continued)

2.3 Summary of significant accounting policies (Continued)

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.

Cash and cash equivalents

In terms of presentation of cash flow statement, 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 costs of the property and equipment purchased before January 1, 2006 are restated for the effects of inflation in TL unit current at December 31, 2005 pursuant to IAS 29. 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:

Furniture and fixtures

Machinery and equipment

Other tangible assets

Leasehold improvements

2-15 years

4 years

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. The weighted average lessee's incremental borrowing rate applied to the lease liabilities as of 31 December 2020 is 25% for local currency liabilities and 7% for foreign currency lease liabilities.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

2. ACCOUNTING POLICIES (Continued)

2.3 Summary of significant accounting policies (Continued)

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.

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 statements.

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.

NOTES TO CONSOLIDATED FINANCIAL STATEMENTS AS AT DECEMBER 31, 2020

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

2. ACCOUNTING POLICIES (Continued)

2.3 Summary of significant accounting policies (Continued)

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 statement 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 statement 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.

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 statement 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

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

2. ACCOUNTING POLICIES (Continued)

2.3 Summary of significant accounting policies (Continued)

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 statement 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 statement 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.

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.

NOTES TO CONSOLIDATED FINANCIAL STATEMENTS AS AT DECEMBER 31, 2020

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

2. ACCOUNTING POLICIES (Continued)

2.3 Summary of significant accounting policies (Continued)

Reinsurance assets

If the reinsurance asset is impaired, the Group reduces its carrying amount accordingly and recognizes that impairment loss in the statement 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.

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.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

2. ACCOUNTING POLICIES (Continued)

2.3 Summary of significant 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.

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 statement 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.

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.

NOTES TO CONSOLIDATED FINANCIAL STATEMENTS AS AT DECEMBER 31, 2020

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

2. ACCOUNTING POLICIES (Continued)

2.3 Summary of significant accounting policies (Continued)

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 December 31, 2020, 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.

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 35 pension investment funds (2019: 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.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

2. ACCOUNTING POLICIES (Continued)

2.3 Summary of significant accounting policies (Continued)

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.

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".

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 statements 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 7,117 effective as of December 31, 2020 (December 31, 2019: TL 6,380) 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 statements at December 31, 2020 and December 31, 2019 is as follows:

	December 31, 2020 %	December 31, 2019 %
Expected rate of salary/yearly limit increase	8.50	8.67
Yearly iscount rate	13.50	13.60

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 statements.

NOTES TO CONSOLIDATED FINANCIAL STATEMENTS AS AT DECEMBER 31, 2020

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

2. ACCOUNTING POLICIES (Continued)

2.3 Summary of significant accounting policies (Continued)

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 statement 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 statements 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 statement, 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 THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

(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.

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:

	December 31, 2020			December 31, 2019		
	USD / TL	Euro / TL	GBP / TL	USD / TL	Euro / TL	GBP / TL
Bid Rates	7.3405	9.0079	9.9438	5.9402	6.6506	7.7765
Ask Rates	7.3647	9.0376	10.0107	5.9598	6.6725	7.8288

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.

NOTES TO CONSOLIDATED FINANCIAL STATEMENTS AS AT DECEMBER 31, 2020

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

2. ACCOUNTING POLICIES (Continued)

2.4 Changes in accounting policy and disclosures

Consolidated financial statements 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 statements is changed, consolidated financial statements 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 31 December 2020:

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

- Amendments to IAS 1 and IAS 8 on the definition of material; effective from Annual periods beginning on or after 1 January 2020. These amendments to IAS 1, 'Presentation of financial statements', and IAS 8, 'Accounting policies, changes in accounting estimates and errors', and consequential amendments to other IFRSs:
 - i) use a consistent definition of materiality throughout IFRSs and the Conceptual Framework for Financial Reporting;
 - ii) clarify the explanation of the definition of material; and
 - iii) incorporate some of the guidance in IAS 1 about immaterial information.
- **Amendments to IFRS 3 definition of a business;** effective from Annual periods beginning on or after 1 January 2020. This amendment revises the definition of a business. According to feedback received by the IASB, application of the current guidance is commonly thought to be too complex, and it results in too many transactions qualifying as business combinations.
- Amendments to IFRS 9, IAS 39 and IFRS 7 Interest rate benchmark reform; effective from Annual periods beginning on or after 1 January 2020. These amendments provide certain reliefs in connection with interest rate benchmark reform. The reliefs relate to hedge accounting and have the effect that IBOR reform should not generally cause hedge accounting to terminate. However, any hedge ineffectiveness should continue to be recorded in the income statement. Given the pervasive nature of hedges involving IBOR-based contracts, the reliefs will affect companies in all industries.
- Amendment to IFRS 16, 'Leases' Covid-19 related rent concessions; effective from Annual periods beginning on or after 1 June 2020. 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.

b) Standards, amendments and interpretations that are issued but not effective as at 31 December 2020:

The company has evaluated the changes in the not yet effective standards mentioned below and has begun to work on the IFRS 17 standard and its effects. Apart from the IFRS 17 standard, the company concluded that the changes made did not have a significant impact on the financial statements.

- 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 THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

(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 31 December 2020:
- Amendments to IAS 1, Presentation of financial statements' on classification of liabilities; effective from 1 January 2022. These narrow-scope amendments to IAS 1, 'Presentation of financial statements', 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 17 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.
 - o **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'.

2.5 Critical accounting estimates and judgments in applying accounting policies

The preparation of consolidated financial statements 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.

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 December 31, 2020, 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.

NOTES TO CONSOLIDATED FINANCIAL STATEMENTS AS AT DECEMBER 31, 2020

(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)

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 statements 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 2.2 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.

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, AvivaSA has taken the necessary actions for the safety of its employees, customers and the society. AvivaSA is evaluating the current news related to pandemic, and sharing all the decisions with its employees and customers as soon as possible.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

2. ACCOUNTING POLICIES (Continued)

2.6 Covid-19 (Continued)

General Explanation (Continued);

As of March 16, 2020, AvivaSA is carrying out its business processes with remote working model. The office is under strict health and safety measures, with the utmost care to maintain social distance, for those who are required to be there as per their duties. The face-to-face customer meetings held by the sales teams are suspended, AvivaSA Mobile application, AvivaSA Individual and Corporate internet branches, social media accounts and Customer Support Center continue to provide services in line with the Business Continuity Plan in order to implement customers' transactions and requests regarding to their contracts and policies.

In line with the normalization processes, sales teams started face-to-face customer meetings on a voluntary basis in a controlled manner as of 15 June 2020, without going to the sales offices in line with the precautions and directions taken by the company. However, as the pandemic conditions have become negative again, our entire sales organization continues its services by using remote working methods without making face-to-face customer visits since 13 November 2020. In addition, the Company has completed infrastructure preparations for remote sales, to be commissioned in July 2020 to support new business production.

The Group acts cautiously about the return plan of the Headquarters teams and takes all necessary precautions. As of July 13, the company has created a 6-week work plan to gradually work in the office, but it has not allowed the employees to go to the office, giving them the flexibility to continue with the remote work model.

Covid-19 Legal Regulations,

As per the new laws and amendments about "Reducing the Effects of 7244 New Coronavirus (Covid-19) Epidemic on Economic and Social Life" that are published in the Official Gazette on 17 April 2020,

- Dividends payments are aloud up to twenty-five percent of the net profit for the year of 2019, until the date of 31 December 2020. If the the dividend payment decisions are already made, but not executed yet, or if partial payments are made, the exceeding amount of twenty-five percent of the net profit will be postponed until the end of the specified period.
- With the President Decision No. 2948 published in the Official Gazette on 18 September 2020, it was stated that the period specified as 31 December 2020 was postponed for three months.

As per the dividends payment proposal of the Board of Directors in the General Assembly Meeting held on 11 March 2020, 25,245,658.45 TL Prime Capital Reserves (1st and 2nd Series of Capital Reserves) and 23,891,596.55 TL Excess Reserves are separated from the net profit of 209,137,255 TL and the amount of 160.000.000 TL gross dividends payment is planned to be made in cash within two instalments; first one as gross amount of 100,000,000 TL on March 25th, 2020 and the second one as the gross amount of 60,000,000 TL on September 28th, 2020. In accordance with the decision, first instalment is made in 25th and 27th of March 2020, and as of 31st of March 2020. The second installment dividend payment planned to be made on September 28, 2020 could not be made on the stipulated date due to the aforementioned Provisional Article 13 and the "Communiqué on the Procedures and Principles Regarding the Implementation of Provisional Article 13 of the Turkish Commercial Code No. 6102". Following the expiry of the aforementioned regulations, the second installment dividend payment will be made without delay, and the second installment dividend amounts are included in the accounts payable to the partners in the Company's financial statements dated 31 December 2020.

Due to the expiration of the effective date of these regulations, the second installment dividend payments were made on January 6 and January 8, 2021.

NOTES TO CONSOLIDATED FINANCIAL STATEMENTS AS AT DECEMBER 31, 2020

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

2. ACCOUNTING POLICIES (Continued)

2.6 Covid-19 (Continued)

General Explanation (Continued);

- The force majeure short-term work payment applications will be executed in accordance with the employers' declaration without waiting for the completion of the conformity assessment.
- All kinds of employment or service contracts cannot be terminated by the employer for the next three months, except for the situations that do not comply with the rules of ethics and goodwill or similar reasons. Considering only three months of period, employers may obligate the employees for full or partial unpaid vacation leave

The group has paused the face-to-face customer meetings held by its sales teams as of 16 March 2020. In line with this practice, the company made applications for individual short-time work allowance for April, May and June under the relevant law article for sales staff, and sales teams benefited from short-time work allowance in April-May-June. In April, the necessary applications for cash wage support were made for employees who could not benefit from the short-time working allowance, valid from May, and in April, employees who could not benefit from the short-time working allowance were granted an annual leave for unemployed periods.

Presidential Decision dated 29 June 2020 and numbered 2706 in the Official Gazette dated 30 June 2020

Within the framework of the principles stated in the additional article 2 of the Unemployment Insurance Law dated 25/8/1999 and numbered 4447 and the temporary article 23, the duration of the short-time working allowance for workplaces that applied for short-term work until 30 June 2020 (including this date) for compelling reasons within the context of periodic situations due to external influences due to the new coronavirus (Covid-19); without the need for a new application and eligibility assessment, for the same workers who have previously benefited from short work and provided that they do not exceed the same conditions, as of 1 July 2020 in terms of workplaces whose short work application has ended before the publication date of this decision, in terms of workplaces whose short-term practice continued on the date of publication of this decision, one month has been extended starting from the short-term end date

The Group made the necessary applications for its sales staff in accordance with the related decision numbered 2706 published in the Official Gazette on 30 June 2020.

In line with the normalization processes, sales teams are controlled on a voluntary basis. As of 15 June 2020, in line with the precautions and directions taken by the group, it has started face to face customer meetings without going to the sales offices.

In the Official Gazette dated 31 July 2020 and numbered 31202; Presidential Decisions have been published regarding the reduction of the withholding tax rate on payments made in return for the lease of goods and rights from 20% to 10% to be applied to payments to be made between 31 July 2020 - 31 December 2020 and the reduction of the VAT rate to 8 percent and 1 percent for some services.

- With the Decree No. 2813, the withholding rate on payments made for the lease of goods and rights was reduced from 20 percent to 10 percent to be applied to payments to be made between 31 December 2020 31 December 2020.
- With the provisional article 6 added to the Decree No. 2007/13033 with the Decree No. 2812, the VAT rate for workplace rental services has been reduced from 18% to 8%, effective from 31 July 2020, until 31 December 2020.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

2. ACCOUNTING POLICIES (Continued)

2.6 Covid-19 (Continued)

Covid-19 Legal Regulations,(Continued)

According to the Presidential decision published in the Official Gazette on 23 December 2020, the "31 December 2020" date in the provisional article 6 of the decision regarding the determination of Value Added Tax rates to be applied to goods and services has been changed to 31 May 2021.

The annex of the Presidential Decree No. 3319, published in the Official Gazette dated 23 December 2020 and numbered 31343, and the Council of Ministers Decisions numbered 2009/14592 and 2009/14594 regarding the withholding tax rates in Articles 94 of the Income Tax Law and 15th of the Corporate Tax Law decisions have been changed.

With the aforementioned amendment, within the framework of the President's Decree No. 2813 published in the Official Gazette dated 31 July 2020 and numbered 31202, the term of the lease payments, which were reduced in the withholding rate until 31 December 2020, was extended until 31 May 2021.

The company has calculated the leases, which are subject to IFRS 16, for the periods specified in the President's Decisions, taking into account the new withholding and VAT rates, and reflected them in its financial statements.

Significant changes in the Group, Tariff changes, strategy changes

Industry announcement of T. C. Ministry of Treasury and Finance General Directorate of Insurance 36908670-010.07.02-E-221551 dated 25 March 2020 on the measures taken for the covid-19 outbreak and facilitating the payment of insurance premiums, one month additional period has been granted for policy cancellations. Within the scope of this announcement, the Group postponed the cancellation that should be made at the end of April, May and June to the policies that could not pay the following due date until the end of July.

The Group started Customer information on policy collections as of July 1, in line with the new normalization process decisions made by the Presidency dated June 10, 2020. The cancellations of the policies, which are not collected, realized as of the end of July.

The Group made advance incentive commission payments in order to minimize the potential negative effects of COVID-19 outbreak on commercial activities carried out under the agency agreement. The portion of the advance paid Temporary Incentive Commission amount that corresponds to monthly production is accepted as a "partial progress payment" and reflected in the profit and loss statement.

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.

NOTES TO CONSOLIDATED FINANCIAL STATEMENTS AS AT DECEMBER 31, 2020

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

3. SEGMENT INFORMATION (Continued)

Life Protection (Continued)

- 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.

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 statement 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 statement 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 statement of profit or loss:

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

3. SEGMENT INFORMATION (Continued)

	Life Insurance Reconciliation to statement of					atement of profit and loss			
				Personal		Commissions Net			Statement of
January 1 - December 31, 2020	Pension	Life protection	Life savings	accident	Total	expenses	Other	mathematical reserves	profit or loss
Gross written premiums	_	1,257,321,112	9,046,391	65,504,791	1,331,872,294	_	_	_	1.331.872.294
Premium ceded to reinsurers	_	(15,703,657)	(554,345)	(2,191,422)	(18,449,424)	_	_	_	(18,449,424)
Premium written net of reinsurance	-	1,241,617,455	8,492,046	63,313,369	1,313,422,870	-	-	-	1,313,422,870
W. J. J. J. J. J. J. J. J. J. J. J. J. J.		(501, 110, 055)	50 501 445		(455.041.511)			455.041.511	
Net change in mathematical reserves	-	(531,442,957)	53,501,446	-	(477,941,511)	-	-	477,941,511	-
Net change in provision for unearned premiums reserves	-	19,854,852	14,254	7,805,759	27,674,865	-	-	-	27,674,865
Net premiums earned	-	730,029,350	62,007,746	71,119,128	863,156,224	-	-	477,941,511	1,341,097,735
Net change in mathematical reserves	_	_	_	_	_	_	_	(477,941,511)	(477,941,511)
Claim paid and change in outstanding claims	_	(158,433,094)	(58,091,572)	(2,545,256)	(219,069,922)	_	_	(, , , , , , , , , , , , , , , , , , ,	(219,069,922)
Commission income	_	8,574,112	253,041	2.051.658	10.878.811	_	_	_	10.878.811
Commission expense	_	(171,972,327)	233,041	(37,073,590)	(209,045,917)	870,000	_	_	(208,175,917)
Commission expense	_	(212,433,458)	_	(37,073,590)	(249,507,048)	870,000	_	_	(248,637,048)
DAC	-	40,461,131	-	(37,073,390)	40,461,131	870,000	_	_	40.461.131
Other income / (expense), net	-	64,916,465	-	1,844,986	66,761,451	-	544,764	-	67,306,215
		473,114,506	4,169,215	35,396,926	512,680,647		344,704		07,300,213
Life and personal accident technical profit	-	4/3,114,500	4,109,215	35,390,920	512,080,047				
Fund management charge	339,782,295	_	_	_	339,782,295	-	_	_	339,782,295
Management fee	2,103,743	_	_	_	2,103,743	_	_	_	2,103,743
Account management fee, net of DIR	86,235,463	_	_	_	86,235,463	_	_	-	86,235,463
Account management fee	74,710,364	_	_	_	74,710,364	_	_	-	74,710,364
DIR	11,525,099	_	_	_	11,525,099	_	_	_	11,525,099
Premium holiday charges	497,876	_	_	_	497,876	_	_	_	497,876
Deferred fee	24,761,198	_	_	_	24,761,198	_	_	_	24,761,198
Pension income	453,380,575		_	-	453,380,575	-		-	453,380,575
Fund management charge	(37,215,192)	-	-	-	(37,215,192)	-	-	-	(37,215,192)
Commission expense, net of DAC	(110,986,150)	-	-	-	(110,986,150)	3,103,907	-	-	(107,882,243)
Commission expense	(121,364,008)	-	-	-	(121,364,008)	3,103,907	-	-	(118,260,101)
DAC	10,377,858	-	-	-	10,377,858	-	-	-	10,377,858
Other income / (expense), net	(21,962,551)	-	-	-	(21,962,551)	-	-	-	(21,962,551)
Pension expenses including commission	(170,163,893)	-	-	-	(170,163,893)	3,103,907	-		(167,059,986)
Pension technical profit	283,216,682				283,216,682				
rension technical profit	203,210,002	-	-	-	203,210,002				
Total technical profit	283,216,682	473,114,506	4,169,215	35,396,926	795,897,329				
General and administrative expenses					(424,332,164)				
Net technical profit after overhead expenses	283,216,682	473,114,506	4,169,215	35,396,926	371,565,165				
Francisco en de como esta (Assa) ant					6 152 624				
Foreign exchange gain/(loss), net					6,153,634				
Investment and other income/(expense), net					73,582,593				
Net financial income					79,736,227				
Profit before taxes					451,301,392				
Income tax expense					(101,663,419)				

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

3. SEGMENT INFORMATION (Continued)

XX		Life Insura	ance			Reco	nciliation to state	ment of profit or loss	1
				Personal		Commissions	Other	Net change in mathematical	Statement of
January 1 - December 31, 2019	Pension	Life protection	Life savings	accident	Total	expenses	expenses	reserves	profit or loss
~									
Gross written premiums	-	896,374,365	8,947,121	82,432,727	987,754,213	-	-	-	987,754,213
Premium ceded to reinsurers	-	(21,773,562)	(267,891)	(5,523,970)	(27,565,423)	-	-	-	(27,565,423)
Premium written net of reinsurance	-	874,600,803	8,679,230	76,908,757	960,188,790	-	-	-	960,188,790
Net change in mathematical reserves	_	(449,214,022)	43,892,244	_	(405,321,778)	_	_	405,321,778	_
Net change in provision for unearned premiums reserves	_	28,407,922	36,333	(3,185,899)	25,258,356	_	_	-	25,258,356
Net premiums earned	-	453,794,703	52,607,807	73,722,858	580,125,368			405,321,778	985,447,146
Net change in mathematical reserves	-	-	-			-		(231,220,885)	(231,220,882)
Claim paid and change in outstanding claims	-	(71,458,269)	(48,113,215)	(4,277,097)	(123,848,581)	-	9,421	-	(123,839,160)
Commission income	-	9,420,211	226,236	1,571,140	11,217,587	-	-	-	11,217,587
Commission expense	-	(146,801,399)	(36,400)	(35,620,670)	(182,458,469)	501,990	-	-	(181,956,479)
Commission expense	-	(189,815,560)	(36,400)	(35,620,670)	(225,472,630)	501,990	-	-	(224,970,640)
DAC	-	43,014,161	_	-	43,014,161	-	-	-	43,014,161
Other income / (expense), net	-	36,164,009		(87,473)	36,076,536	-	-	-	36,076,536
Life and personal accident technical profit	-	281,119,255	4,684,428	35,308,758	321,112,441				, ,
Fund management charge	254,941,638	-	-	-	254,941,638	-	-	-	254,941,638
Management fee	6,603,275	-	-	-	6,603,275	-	-	-	6,603,275
Account management fee, net of DIR	66,610,871	-	-	-	66,610,871	-	-	-	66,610,871
Account management fee	71,050,231	-	_	-	71,050,231	-	-	-	71,050,231
DIR	(4,439,360)	-	_	-	(4,439,360)	-	-	-	(4,439,360)
Premium holiday charge	50	_	_	_	50	-	_	-	50
Deferred fee	35,045,925	_	_	_	35,045,925	_	_	_	35,045,925
Entry and deferred entry fees income	1.607.466	_	_	_	1,607,466				1,607,466
Pension income	364,809,225				364,809,225				1,007,100
r ension income	304,009,223				304,007,223				
Fund management charge	(27,257,008)	-	-	_	(27,257,008)				(27,257,008)
Commission expense, net of DAC	(74,143,397)	_	_	_	(74,143,397)	1,532,387	(1,423,176)	-	(74,034,186)
Commission expense	(77,894,793)	_	_	_	(77,894,793)	1,532,387	(1,423,176)	_	(77,785,582)
DAC	3,751,396	_	_	_	3,751,396	-,,	(-,,- , -,		3,751,396
Other income/(expense), net	(20,726,078)	_	_	_	(20,726,078)				(20,726,078)
Pension expenses including commission	(122,126,483)				(122,126,483)	1,532,387	(1,423,176)		(122,017,272)
rension expenses merating commission	(122,120,400)				(122,120,405)	1,002,007	(1,425,170)		(122,017,272)
Pension technical profit	242,682,742		-	-	242,682,742				
Total technical profit	242,682,742	281,119,255	4,684,428	35,308,758	563,795,183				
General and administrative expenses	444,004,144	201,117,233	7,007,720	33,300,730	(351,823,911)				
	242 (92 742	201 110 255	4 (04 420	25 200 550					
Net technical profit after overhead expenses	242,682,742	281,119,255	4,684,428	35,308,758	211,971,272				
Foreign exchange gain/(loss), net					3,575,309				
Investment income/(expense), net					117,539,428				
Net financial income					121,114,737				
Profit before taxes					333,086,009				
Income tox expense					(75 554 060)				
Income tax expense Profit for the year					(75,554,060) 257,531,949				
r rom for the year					457,551,949				

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

(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 AvivaSA's Board of Directors dated July 15, 2011 and numbered 2011/29, AvivaSA established a risk committee. Subsequently, pursuant to a resolution of AvivaSA'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.

AvivaSA Emeklilik ve Hayat A.Ş.'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.

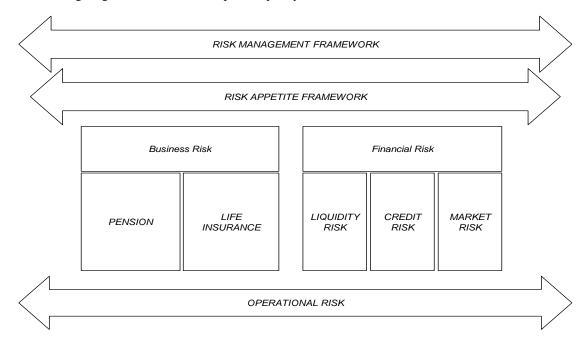
NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

(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 STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

(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 STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

(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 December 31, 2020 and December 31, 2019, 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 claims ratio	December 31, 2020	December 31, 2019
Life	5%	4%
Personal Accident (Casualty)	3%	5%

As at December 31, 2020 and December 31, 2019 that part of total risk which is ceded to reinsurers is given below on a risk coverage basis.

December 3	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 Accidental		Accidental di	sability	A	Accidental treat	tment cost I	Unemployment
7.00%		11.50%		C	0.02%	1	00.00%
December :	31, 2019						
Life				_			
Natural death	Accidental Death	Accidental disability	Sickness disability	Dangerous Sickness	Public Transport	Unemployment	Accidental Treatment Cost
8.42%	12.98%	27.27%	33.48%	50.49%	16.16%	100.00%	1.99%
Personal A	ccident						
Accidental	death	Accidental di	isability	A	ccidental treati	nent cost U	nemployment
14.27%		22.58%		0.0	06%	10	00.00%

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 December 31, 2020 and December 31, 2019 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):

December 31, 2020	Total gross risk liability	Share of reinsurer in total risk liability	Net risk liability
,	ν	•	·
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
		Share of reinsurer	
December 31, 2019	Total gross risk liability	in total risk liability	Net risk liability
Life	50.688.699.110	4.268.272.016	46,420,427,094
Personal Accident	40,278,781,382	7,247,054,261	33,031,727,121
Total	90,967,480,492	11,515,326,277	79,452,154,215

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

(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 December 31, 2020 and December 31, 2019 are as follows:

Outstanding Claims	December 31, 2020	December 31, 2019
Life	79,262,316	60,490,381
Personal Accident	7,572,909	9,131,358
Total	86,835,225	69,621,739

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 December 31, 2020 and December 31, 2019 are as follows:

At December 31, 2020, on condition that all variables remain constant, effect of a 20% appreciation/devaluation of Eurobonds against TL on owners' equity is TL 7,633,800/ (7,633,800). As at December 31, 2019, on condition that all variables remain constant, effect of a 20% appreciation/devaluation of Eurobonds against TL on owners' equity is TL 623,088/ (623,088).

December 31, 2020:

Liabilities and assets in foreign			
currency	Effect of		
Exchange rate variation (*)	USD (*)	EUR (*)	GBP (*)
%20	18,583,186	(389,650)	(11,500)
(%20)	(18,583,186)	389,650	11,500

December 31, 2019:

Liabilities and assets in foreign currency	Effect on		
Exchange rate variation (*)	USD (*)	EUR (*)	GBP (*)
%20 (%20)	(1,125,642) 1,125,642	(761,372) 761,372	(204) 204

(*) All amounts are presented in TL.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

(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 December 31, 2020:

Total of trading and available for sale financial assets	Effec		
Market interest increase / (decrease) (**)	TL	USD (*)	EUR (*)
0/5	(27.462.074)	(25.746.612)	(20.467)
%5	(27,463,974)	(25,746,612)	(20,467)
(%5)	27,463,974	25,746,612	20,467
%1	(5,492,795)	(51,493,223)	(40,934)
(%1)	5,492,795	51,493,223	40,934

^(*) Amounts are presented in TL.

As at December 31, 2019:

Total of trading and available for sale financial assets	Effec		
Market interest increase / (decrease) (**)	TL	USD (*)	EUR (*)
%5	(26,328,462)	(18,034,162)	(4,449)
(%5)	27,790,025	11,340,308	4,472
%1	(6,241,926)	(33,740,633)	(8,875)
(%1)	5,260,443	27,839,858	8,966

^(*) Amounts are presented in TL.

^(**) 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 STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

4. INSURANCE AND FINANCIAL RISK MANAGEMENT (Continued)

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.

Maximum exposure to credit risk

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

	December 31, 2020	December 31, 2019
Financial assets	2,229,963,493	1,771,746,764
Cash and cash equivalents	994,041,049	398,527,876
Pension business receivables	197,580,785	212,976,185
Premium and other insurance receivables	35,330,094	37,011,109
Reinsurance share of insurance liabilities	10,949,619	15,815,927
Other financial assets	868,012	868,012
Total	3,468,733,052	2,436,945,873

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.

Below table shows the distribution of the Company's financial and insurance liabilities based on their contractual periods or remaining period to maturities as of the balance sheet date:

As of 31 December 2020, 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 STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

(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:

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 statement of financial position.

	Carrying			3 months to		5 years	No maturity	Undiscounted
December 31, 2020	amount	Up to 1 month	1-3 months	1 year	1-5 years	and over	date	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	2.1,555,755				170,200,000	11,57.1,700	20,202,070	220,107,911
investments, Policyholders' portfolio	1,876,188,555	-	-	-	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	30,342,375	-	-	-	-	-	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	443,790,644	56,945,961	39,797,044	158,435,282	12,630,271	-	711,599,201
Liquidity surplus/(deficit)	2,746,184,231	(388,933,636)	816,089,787	182,832,331	563,268,800	1,470,161,152	24,100,687	2,667,519,121

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

4. INSURANCE AND FINANCIAL RISK MANAGEMENT (Continued)

c) Liquidity Risk (Continued)

As at December 31, 2019, table of liquidity risk is as follows:

	Carrying			3 months to		5 years	No maturity	Undiscounted
December 31, 2019	amount	Up to 1 month	1-3 months	1 year	1-5 years	and over	date	Totals
Financial assets								
Cash and cash equivalents	398,527,876	27,664,968	300,747,063	80,702,091	-	-	-	409,114,122
Financial assets	1,771,746,764	-	17,228,829	90,096,772	278,528,675	938,265,941	310,325,097	1,634,445,314
- Available for sale financial investments	193,245,501	-	-	25,310,602	157,371,117	-	-	182,681,719
 Financial assets at fair value through profit or loss Available for sale asset backing financial investments, 	512,015,032	-	17,228,829	25,310,602	32,184,592	-	310,325,097	385,049,120
Policyholders' portfolio	1,066,486,231	-	-	39,475,568	88,972,966	938,265,941	-	1,066,714,475
Premium and other insurance receivables	37,011,109	-	25,081,270	11,577,140	352,699	-	-	37,011,109
Pension business receivables	212,976,185	14,787,668	8,805,158	26,415,474	102,274,394	60,693,491	-	212,976,185
Other financial assets	868,012	-	-	-	-	-	868,012	868,012
Total	2,421,129,946	42,452,636	351,862,320	208,791,477	381,155,768	998,959,432	311,193,109	2,294,414,742
Financial liabilities								
Lease liabilities	35,733,545	35,733,545	-	-	-	-	_	35,733,545
Due to insurance and reinsurance companies	43,940,869	465,116	43,475,753	-	-	-	-	43,940,869
Pension business payables	486,090,486	202,259,875	11,365,566	34,096,699	132,014,259	106,354,087		486,090,486
Other payables and liabilities	46,051,457	31,580,499	5,700,445	105,373	8,665,141		-	46,051,458
Total	611,816,357	270,039,035	60,541,764	34,202,072	140,679,400	106,354,087	-	611,816,358
Liquidity surplus/(deficit)	1,809,313,589	(227,586,399)	291,320,556	174,589,405	240,476,368	892,605,345	311,193,109	1,682,598,384

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

(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).

	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 policyholders classified as				
available for sale and held to maturity (Note 6) (*)	1,873,470,735	-	-	1,873,470,735
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.

	December 31, 2019			
	Level 1	Level 2	Level 3	Total
Financial assets:				
Available for sale financial assets (Note 6)	193,245,501	_	_	193,245,501
Financial assets held for trading (Note 6)	383,015,032	_	-	383,015,032
Financial investments with risks on company as				
held to maturity (Note 6)	129,000,000	_	-	129,000,000
Financial investments with risks on policyholders classified as				
available for sale and held to maturity (Note 6) (*)	1,035,844,554	-	-	1,035,844,554
Total financial assets	1,741,105,087	-	-	1,741,105,087

^(*) Time deposits amounting to TL 30,641,677 are not included. Carrying values of time deposits approximate their fair values due to their short term nature.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

(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 Ministry of Treasury and Finance, 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 December 31, 2020 and December 31, 2019, the Company has a sufficient amount of equity for losses which may arise from current liabilities and potential risks of the Company. As of December 31, 2020 and 2019, the required capital reserves (calculated in accordance with the above-mentioned local regulation) and current capital adequacy analysis is as follows:

	December 31, 2020	December 31, 2019
Total shareholders' equity in the statutory consolidated financial statements (*)	722,469,731	547,413,447
Required minimum capital reserves	369,206,991	235,572,317
Capital surplus	353,262,740	311,841,130

(*) Excluded equalization reserve.

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 Ministry of Treasury and Finance, 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 STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

5. CASH AND CASH EQUIVALENTS

As at December 31, 2020 and December 31, 2019, cash and cash equivalents are as follows:

	December 31, 2020	December 31,2019
Banks	665,739,196	190,080,031
Other cash and cash equivalents (**)	328,470,720	208,489,233
Cheques given and payment orders	(168,867)	(41,388)
Total cash and cash equivalents	994,041,049	398,527,876
Blockage amount (*)	(147,266,248)	(98,984,103)
Accrued interest	(1,657,313)	(1,348,651)
Time deposits more than 3 months	(142,018,063)	(17,820,600)
Total cash and cash equivalents per statement of cash flow	703,099,425	280,374,522

^(*) Note 32 presents the details about the blockage on bank accounts in favour of Ministry of Finance and Treasury.

Interest rates of time deposits are stated below:

	December 31, 2020	December 31, 2019	
	Interest Rate	Interest Rate	
	(%)	(%)	
EUR	2.07%	-	
USD	2.71%	2.22	
TL	17.82%	11.49	

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

As of December 31, 2019, TL deposit maturity varies between January 2, 2019 and November 7, 2019, foreign currency deposits maturity varies between January 2, 2019 and September 12, 2019.

As at December 31, 2020 and December 31, 2019; the detail of cash and cash equivalents are as follows:

	December 31, 2020	December 31, 2019
Foreign currency cash and cash equivalents	157,834,723	21,692,167
- demand deposits	2,071,465	1,791,284
- time deposits	155,763,258	19,900,883
TL cash and cash equivalents	836,206,326	376,835,709
- demand deposits	19,422,791	20,808,958
- time deposits	488,481,682	147,578,906
- credit card receivables	328,470,720	208,489,233
- cheques given and payment orders	(168,867)	(41,388)
Total	994,041,049	398,527,876

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

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

6. FINANCIAL ASSETS

As at December 31, 2020 and December 31, 2019; the securities portfolio of the Group is as follows:

	December 31, 2020	December 31, 2019
Financial assets at fair value through profit / loss	241,385,756	512,015,032
Total available for sale financial assets and held to maturity	1,988,577,737	1,259,731,732
Available for sale financial investments	112,389,182	193,245,501
Available for sale asset backing financial investments and		
held to maturity policyholders' portfolio	1,876,188,555	1,066,486,231
Total securities portfolio	2,229,963,493	1,771,746,764

As at December 31, 2020 and December 31, 2019; financial assets as fair value through profit or loss are as follows:

	December 31, 2020		
	Cost	Fair value	Carrying value
Investment funds	16,969,101	23,232,675	23,232,675
Treasury bills and government bonds	162,587,639	169,041,984	169,041,984
Eurobonds-USD	36,936,845	39,401,594	39,401,594
Private sector bonds	3,800,000	3,993,011	3,993,011
Derivatives	5,716,492	5,716,492	5,716,492
Total financial assets at fair value through profit or loss	226,010,077	241,385,756	241,385,756
_	Dec	ember 31, 2019	
	Cost	Fair value	Carrying value
Investment funds	320,680,239	332,494,367	332,494,367
Treasury bills and government bonds	33,419,418	33,291,862	33,291,862
Private sector bonds	14,725,321	17,228,803	17,228,803
Reverse repo	129,000,000	129,000,000	129,000,000
Total financial assets at fair value through profit or loss	497,824,978	512,015,032	512,015,032

As at December 31, 2020 and December 31, 2019; available for sale financial assets owned by the Group are as follows:

	December 31, 2020		
	Cost	Fair value	Carrying value
Treasury bills and government bonds - TL	42,585,039	44,752,220	44,752,220
Private Sector bonds	59,399,160	67,636,962	67,636,962
Total available for sale financial investments	101,984,199	112,389,182	112,389,182
Total available for sale illiancial investments	December 31, 2019		
	Cost	Fair value	Carrying value
Treasury bills and government bonds - TL	165,679,396	163,826,455	163,826,455
Private Sector bonds	24,760,000	29,419,046	29,419,046
Total available for sale financial investments	190,439,396	193,245,501	193,245,501

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

6. FINANCIAL ASSETS (Continued)

As at December 31, 2020 and December 31, 2019; available for sale financial assets backing insurance contracts and held to maturity financial assets are as follows:

	December 31, 2020			
	Cost Fair value		Carrying value	
	10 105 006	26.255.150	26.255.150	
Treasury bills and government bonds-TL	42,405,896	36,255,179	36,255,179	
Eurobonds - USD	739,032,143	772,301,793	772,301,793	
Eurobonds - EUR	872,726	980,880	980,880	
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	

	December 31, 2019			
	Cost	Fair value	Carrying value	
Treasury bills and government bonds-TL	48,045,996	41,884,722	41,884,722	
Eurobonds - USD	786,601,906	742,449,400	742,449,400	
Eurobonds - EUR	2,556,328	2,615,036	2,615,036	
Time deposits - TL	5,000,000	6,248,965	6,248,965	
Time deposits - USD	25,637,903	24,392,711	24,392,711	
Held to maturity Eurobonds- USD	245,059,725	248,895,397	248,895,397	
Total available for sale asset backing financial investments				
and held to maturity policyholders' portfolio	1,112,901,858	1,066,486,231	1,066,486,231	

As at December 31, 2020 and December 31, 2019; financial assets at fair value through profit or loss and available for sale financial assets movement table are as follows:

	2020	2019
Opening, January 1	1,771,746,764	843,339,645
Purchases	6,063,378,645	5,380,630,263
Disposals	(4,703,843,692)	(4,508,574,570)
Change in the valuation - unrealized gain and losses	48,832,854	(15,733,128)
Disposals through the redemption	(936,984,543)	(99,817,704)
Unrealized exchange rate gains/(losses)	(68,019,725)	103,232,880
Change in balance recognized under equity	46,329,344	49,803,988
Change in balance recognized under life		
mathematical reserves	8,523,846	18,865,390
Closing, December 31	2,229,963,493	1,771,746,764

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

FINANCIAL ASSETS (Continued)

The maturity analysis of financial assets is as follows:

As at December 31, 2020 and December 31, 2019; the remaining contractual maturities of financial assets are as follows:

			D	ecember 31, 2	020		
	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
	**********	6,774,137	11,565,136	33,300,015	335,234,357	1,814,140,682	2,229,963,493
	28,949,166	0,774,137	11,505,150	00,000,010	000,20 1,00	1,01 1,1 10,002	, ,, ,, ,,
	28,949,166	0,774,137	, ,	, ,		1,011,110,002	, , , , , , , ,
	28,949,166 No stated	0-3	, ,	December 31, 2		More than	, , , , , , , ,
		, ,	I	December 31, 2	019		Total
Eurobonds	No stated	0-3	3-6 months	December 31, 2 6 months	019 1-3 years	More than 3 years	Total
Eurobonds Investment funds	No stated maturity	0-3	3-6	December 31, 2 6 months	019	More than	Total 790,457,871
Investment funds	No stated	0-3	3-6 months	December 31, 2 6 months	019 1-3 years	More than 3 years	Total
Investment funds Government bonds and	No stated maturity	0-3 months	3-6 months	December 31, 2 6 months	019 1-3 years 58,475,675	More than 3 years 702,883,433	Total 790,457,871 332,494,367
Investment funds Government bonds and treasury bills	No stated maturity	0-3 months	3-6 months	December 31, 2 6 months	019 1-3 years 58,475,675 - 130,785,216	More than 3 years 702,883,433 93,333,951	Total 790,457,871 332,494,367 239,003,039
Investment funds Government bonds and treasury bills Private sector bonds	No stated maturity	0-3 months	3-6 months	December 31, 2 6 months	019 1-3 years 58,475,675 - 130,785,216 39,595,759	More than 3 years 702,883,433 - 93,333,951 6,524,861	Total 790,457,871 332,494,367 239,003,039 46,647,849
Investment funds Government bonds and treasury bills Private sector bonds Eurobond private sector	No stated maturity	0-3 months - - 14,883,872 527,229	3-6 months	December 31, 2 6 months	019 1-3 years 58,475,675 - 130,785,216	More than 3 years 702,883,433 93,333,951	Total 790,457,871 332,494,367 239,003,039 46,647,849 203,501,961
Investment funds Government bonds and treasury bills Private sector bonds	No stated maturity	0-3 months	3-6 months	December 31, 2 6 months	019 1-3 years 58,475,675 - 130,785,216 39,595,759	More than 3 years 702,883,433 - 93,333,951 6,524,861	Total 790,457,871 332,494,367 239,003,039 46,647,849

The currency analysis of financial assets is as follows:

	December 31, 2020			
	Currency Type	Currency Amount	Rate	Amount TL
Financial assets available-for-				
sale	TL			112,389,182
				112,389,182
				,
Financial assets at fair value				
through profit or loss	TL			201,984,162
	USD	5,367,699	7,3405	39,401,594
				241,385,756
Financial investments with risks				
on policy holders	USD	250,151,172	7,3405	1,836,234,677
	EUR	108,891	9,0079	980,879
	TL			38,972,999
				1,876,188,555
Total securities portfolio				2,229,963,493

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

6. FINANCIAL ASSETS (Continued)

		December 31, 20	19	
	Currency Type	Currency Amount	Rate	Amount TL
Financial assets available-for-sale	TL			193,245,501
				193,245,501
Reverse repo				129,000,000
Financial assets at fair value through profit or loss	TL			383,015,032
				512,015,032
Financial investments with risks on policy				
holders	USD	171,203,839	5,9402	1,016,985,045
	EUR	393,203	6,6506	2,615,035
	TL	·		46,886,151
				1,066,486,231
Total securities portfolio				1,771,746,764

7. REINSURANCE SHARE OF INSURANCE LIABILITIES

As at December 31, 2020 and December 31, 2019; reinsurance share of insurance liabilities are as follows:

	December 31, 2020	December 31, 2019
Reinsurers' share of outstanding claims	6,193,687	7,301,642
Reinsurers' share of unearned premiums reserve	3,245,141	6,516,521
Reinsurers' share of life mathematical reserve	1,510,791	1,997,764
	10,949,619	15,815,927

8. PREMIUM AND OTHER INSURANCE RECEIVABLES

As at December 31, 2020 and December 31, 2019; premium and other insurance receivables are as follows:

	December 31, 2020	December 31, 2019
Policyholders and reinsurance companies	35,330,094	37,011,109
Total premium and other insurance receivables	35,330,094	37,011,109

As at December 31, 2020 and December 31, 2019; maturity distribution of neither past due nor impaired insurance operations receivables is as follows:

	December 31, 2020	December 31, 2019
Receivables from policyholders and reinsurance companies		
Up to 3 months	6,100,353	8,736,266
3 to 6 months	4,080,780	5,651,573
6 to 9 months	2,499,183	3,789,420
9 to 12 months	808,809	1,179,789
	13,489,125	19,357,048

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

8. PREMIUM AND OTHER INSURANCE RECEIVABLES (Continued)

As at December 31, 2020 and December 31, 2019; an analysis of the aging of overdue but not impaired insurance operations receivables is as follows:

	December 31, 2020	December 31, 2019
Overdue 0-3 months	9,957,112	11,799,488
Overdue 3-6 months	183,073	585,835
Overdue 6-9 months	119,886	207,997
Overdue 9-12 months	63,454	162,526
Overdue 1 year	613,881	352,699
	10,937,406	13,108,545
Total	24,426,531	32,465,593

As of December 31, 2020, total of receivables from reinsurance companies and intermediaries are TL 10,903,563 (31 December 2019: TL 4,545,516).

As at December 31, 2020 and December 31, 2019; the collateral held by the Group as security for its receivables are as follows:

		December :	31, 2020	
	USD	EUR	TL	Total (TL)
Guarantees received				
Letter of guarantees	440,430	-	19,863,500	20,303,930
Mortgage deed	, <u>-</u>	-	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
		December	31, 2019	
	USD	EUR	TL	Total (TL)
Guarantees received				
Letter of guarantees	356,412	-	14,206,330	14,562,742
Mortgage deed	, <u>-</u>	-	309,700	309,700
Other guarantees	533,963	18,375	222,686	775,024
	890,375	18,375	14,738,716	15,647,466

9. PENSION BUSINESS RECEIVABLES AND PAYABLES

As at December 31, 2020 and December 31, 2019; pension business receivables are as follows:

	December 31, 2020	December 31, 2019
Pension business receivables - deferred income reserves	169,270,198	197,593,665
Receivables pension operations	27,539,314	14,787,668
Capital advance for pension funds	771,273	594,852
Total individual pension business receivables, net	197,580,785	212,976,185

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

9. PENSION BUSINESS RECEIVABLES AND PAYABLES (Continued)

As at December 31, 2020 and December 31, 2019; pension business payables are as follows:

	December 31, 2020	December 31, 2019
Temporary account of participants	304,074,321	230,271,710
Pension business payables - deferred income reserves (*)	215,970,209	255,818,776
Total pension business payables	520,044,530	486,090,486

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

10. OTHER ASSETS

As at December 31, 2020 and December 31, 2019; other assets are as follows:

	December 31, 2020	December 31, 2019
Prepaid expenses	35,370,184	5,199,477
Other receivables from other related parties	1,024,260	3,114,021
Advances to personnel	1,881,965	204,482
Advances given	1,306,315	635,488
Other receivables from third parties	186,285	220,631
Deposits and guarantees given	88,836	71,307
Receivables from shareholders (Note 33)	547,351	23,568
Other	263,248	251,443
Total other assets	40,668,444	9,720,417

11. PROPERTY AND EQUIPMENT, NET

As of December 31, 2020 and December 31, 2019; tangible assets movement and its accumulated depreciation is as follows:

Cost	January 1, 2020	Additions	Disposals	December 31, 2020
Machinery and equipment	13,296,320	4,376,775	(1,629,086)	16,044,009
Furniture and fixtures	21,007,774	2,137,701	(496,957)	22,648,518
Other tangible assets	29,640,700	1,036,438	-	30,677,138
Motor Vehicles	1,721,735	-	-	1,721,735
Right of use assets	42,063,298	3,554,013	-	45,617,311
Total	107,729,827	11,104,927	(2,126,043)	116,708,711
Accumulated depreciation	January 1, 2020	Period charge	Disposals	December 31, 2020
Machinery and equipment	(9,308,787)	(2,334,959)	1,627,143	(10,016,603)
Furniture and fixtures	(13,148,826)	(2,586,832)	422,139	(15,313,519)
Other tangible assets	(15,501,314)	(3,072,205)	-	(18,573,519)
Motor Vehicles	(271,867)	(344,347)	_	(616,214)
Right of use assets	(9,172,556)	(10,250,749)		(19,423,305)
Total	(47,403,350)	(18,589,092)	2,049,282	(63,943,160)
Net book value	60,326,477			52,765,551

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

11. PROPERTY AND EQUIPMENT, NET (Continued)

Cost	January 1, 2019	Additions	Disposals	Impairment	December 31, 2019
Machinery and equipment	12,217,595	1,078,725	-	-	13,296,320
Furniture and fixtures	19,598,506	1,419,534	(10,266)	-	21,007,774
Other tangible assets	28,709,137	1,061,636	-	(130,073)	29,640,700
Vehicles	-	1,721,735	-	-	1,721,735
Right of use assets	38,805,375	3,257,923	-	-	42,063,298
	99,330,613	8,539,553	(10,266)	(130,073)	107,729,827

Accumulated depreciation	January 1, 2019	Period charge	Disposals	Impairment	December 31, 2019
Machinery and equipment	(7,237,964)	(2,070,823)	-	-	(9,308,787)
Furniture and fixtures	(11,054,726)	(2,100,231)	6,131	-	(13,148,826)
Other tangible assets	(12,554,680)	(2,946,634)	-	-	(15,501,314)
Vehicles	-	(271,867)	-	-	(271,867)
Right of use assets		(9,172,556)		-	(9,172,556)
Total	(30,847,370)	(16,562,111)	6,131	-	(47,403,350)
Net book value	68,483,243				60,326,477

12. INTANGIBLE ASSETS, NET

As of December 31, 2020 and December 31, 2019; intangible assets movement and its accumulated amortization are as follows:

Cost	January 1, 2020	Additions	Transfer	Disposals	December 31, 2020
Software	101,306,352	41,653,430	14,441,647	-	157,401,429
Capitalized software development costs	14,745,065	18,934,050	(14,441,647)	(4,483,171)	14,754,297
de velopinent costs	11,713,003	10,75 1,050	(11,111,017)	(1,103,171)	11,731,237
Total	116,051,417	60,587,480	-	(4,483,171)	172,155,726
Accumulated					
amortization	January 1, 2020	Period charge	Transfer	Disposals	December 31, 2020
Software	(57,516,287)	(20,841,890)	-	-	(78,358,177)
Total	(57.514.397)	(20.941.900)			(70 350 177)
10181	(57,516,287)	(20,841,890)	-	<u> </u>	(78,358,177)
Net book value	58,535,130				93,797,549
Cost	January 1, 2019	Additions	Transfer	Disposals	December 31, 2019
	•			_	
Software	73,999,388	17,054,542	10,252,422	-	101,306,352
Capitalized software development costs	18,838,796	11,862,018	(10,252,422)	(5,703,327)	14,745,065
development costs	10,030,790	11,002,016	(10,232,422)	(3,703,327)	14,745,005
	92,838,184	28,916,560	-	(5,703,327)	116,051,417
					_
Accumulated amortization	January 1, 2019	Period charge	Transfer	Disposals	December 31, 2019
unoruzuton	Junuary 1, 2017	1 criou charge	114115161	Disposais	December 61, 2015
Software	(43,277,201)	(14,239,086)	-	-	(57,516,287)
Total	(43,277,201)	(14,239,086)	-	-	(57,516,287)
Net book value	49,560,983				58,535,130

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

(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 December 31, 2020 and December 31, 2019; the details of other financial assets are as follows:

	December 31, 2020		December 3	1, 2019	
	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	292,303	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	
		868.012		868.012	

14. LEASE LIABILITIES

As at December 31, 2020 and December 31, 2019; lease liabilities are as follows:

	December 31, 2020	December 31, 2019
Short-term lease liabilities (undiscounted)	11,333,979	14,740,592
Long term lease liabilities (undiscounted)	38,219,902	44,843,368
Discount amount with lease's incremental borrowing		
rate of interest	(19,211,506)	(23,850,415)
Total	30,342,375	35,733,545

Movement of lease liabilities for the period ended December 31, 2020 and December 31, 2019 are as follows:

	December 31, 2020	December 31, 2019
Opening balance, January 1	35,733,545	38,805,375
IFRS 16 lease increase / decrease	3,554,013	3,257,922
Lease payments	(16,960,928)	(14,098,485)
Exchange rate valuation	1,026,263	725,327
Interest payments	6,989,482	7,043,406
Closing balance	30,342,375	35,733,545

15. DUE TO INSURANCE AND REINSURANCE COMPANIES

As at December 31, 2020 and December 31, 2019; due to insurance and reinsurance companies are as follows:

	December 31, 2020	December 31, 2019
Due to the intermediaries	29,782,098	40,616,332
Due to the reinsurance companies	1,945,015	2,859,421
Due to the policyholders	486,380	465,116
	32,213,493	43,940,869

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

16. OTHER PROVISIONS

As at December 31, 2020 and December 31, 2019; provision for expenses and lawsuit provisions are as follows:

	December 31, 2020	December 31, 2019
Demonmal homos muscision	27.025.574	19 604 271
Personnel bonus provision	27,035,574	18,604,271
Provision for lawsuit against the Group (Note 34)	11,366,186	10,457,200
Bonus provision for sales activities	7,467,324	2,680,745
Commission provision	6,967,000	6,016,000
	52,836,084	37,758,216

17. TAXES

Corporate taxes

Statutory income is subject to corporate tax at 22% (2019: 22%). However, with Article 91 of the Bag Law No. 7061 published in the Official Gazette dated December 5, 2017 and numbered 30261, the corporate tax rate is set at 22% for corporate earnings for the tax years 2018, 2019 and 2020 and Provisional Article 10 has been added to the Law on Corporations Tax No. 5520. 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 Turkey, advance tax returns are filed on a quarterly basis. The prepaid taxes are calculated and paid at the rates valid for the earnings of the related years. Advance corporate income tax rate applied in 2020 is 22% (2019: 22%). The payments can be deducted from the annual corporate tax calculated for the whole year 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 STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

17. TAXES (Continued)

Income tax

As at December 31, 2020 and December 31, 2019; prepaid income taxes are netted off with the current income tax payable as stated below:

	December 31, 2020	December 31, 2019
Income taxes payable	90,440,439	70,705,258
Prepaid income taxes (-)	(77,072,087)	(59,267,485)
Current tax liabilities / (assets)	13,368,352	11,437,773

Deferred taxes

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

Since the tax rate effective from January 1, 2018 has been changed to 22% as valid for 3 years, in the calculation of deferred tax as of December 31, 2020, 20% tax rate is used for temporary differences expected to be realized after 31 December 2020. Since the corporate tax rate will be 20% after 2020, deferred tax rate used is 20%.

	Cumulative temporary Differences		Deferred tax a	Deferred tax assets / (liabilities)	
	December 31,	December 31,2019	December 31	December 31,2019	
	2020	Restated (Note 1.1)	,2020	Restated (Note 1.1)	
				_	
Deferred income reserves	215,970,209	255,818,776	45,759,576	54,009,116	
Expense accruals	19,391,623	-	3,878,324	-	
Expense accruals – bonus and commission provision	22,674,922	24,089,850	4,988,483	6,193,739	
Provision for employee termination benefit	21,040,315	15,971,826	4,208,063	3,513,802	
Unused vacation provision	5,421,984	4,775,942	1,084,397	1,050,707	
Claims for Insured Customer Claims	5,934,574	5,231,525	1,186,915	1,046,305	
Right of use asset	4,134,800	2,510,595	826,960	552,331	
Provision for lawsuits	2,740,711	2,433,639	548,142	535,401	
Provisions for agency receivables	2,370,474	2,370,474	474,095	474,095	
Incentive commission	2,011,614	1,699,250	402,323	373,835	
Withdrawal of outstanding legal claims	7,977,352	-	1,595,470	-	
Deposits internal rate of return linear interest rate					
difference	258,455	102,163	51,691	22,476	
Total deferred tax assets	309,927,033	315,004,040	65,004,439	67,771,807	
Deferred acquisition cost	(561,895,075)	(455,243,007)	(107,915,256)	(93,732,691)	
Pension business receivables	(169,270,198)	(197,593,665)	(35,291,579)	(41,910,702)	
Net difference between the carrying values and tax					
base values of tangible assets and intangible assets	(36,380,067)	(12,722,615)	(7,276,013)	(2,798,975)	
Eurobond valuation difference	(2,016,089)	(7,687,231)	(403,218)	(1,691,191)	
Derivative securities	(5,716,491)	-	(1,143,298)	-	
Price difference in coupon bond held for trading	56,509	(45,797)	11,302	(10,075)	
Total deferred tax liabilities	(775,221,411)	(673,292,315)	(152,018,062)	(140,143,634)	
				<u> </u>	
Deferred tax assets/ (liabilities) accounted for under					
equity over the fair value reserve for available for sale					
financial assets	(38,000,707)	4,940,567	(7,600,142)	1,086,924	
Effect of rate change of corporation tax		-	261,066	261,066	
	.=========				
Deferred tax liabilities, net	(503,295,085)	(353,347,708)	(94,352,699)	(71,023,837)	

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

17. TAXES (Continued)

Deferred taxes (Continued)

Movement of deferred tax liabilities for the period ended December 31, 2020 and 2019 are as follows:

		Restated (Note1.1)
	2020	2019
Opening balance, January 1	(57,708,847)	(38,640,075)
ROP DAC impact (*)	(13,314,930)	(10,851,253)
Charged to profit or loss	(15,282,191)	(14,183,691)
Cancellation available for sale financial assets that are recognized in		
shareholders' equity of deferred tax assets	(1,086,924)	(9,574,754)
Deferred tax asset /(liability) recognized in other comprehensive income		
due to fair value losses on available for sale financial assets	(7,600,142)	1,086,924
Deferred tax asset of actuarial loss on employment		
termination provision	640,335	1,139,012
Closing balance, December 31	(94,352,699)	(71.023.837)

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 statements. Deferred income tax assets and liabilities are determined using tax rates and tax legislation that has been enacted at the statement 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.

(*) Effects of ROP DAC impact has been explained in Note 1.1.

Income tax expenses for the period ended December 31, 2020 and December 31, 2019; are as follows:

	January 1 - December 31, 2020	Restated (Note 1.1) January 1 - December 31, 2019
Income tax expense recognized in profit or loss:	(00.205.200)	(55.500.400)
- Current tax charge	(90,205,308)	(66,588,490)
- Deferred tax charge	(15,282,191)	(14,183,691)
Adjustments recognized in the period for current tax of prior periods	3,824,080	5,218,121
Income tax expense	(101,663,419)	(75,554,060)

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

	January 1 - December 31, 2020	Restated (Note 1.1) January 1 – December 31, 2019
Profit before taxes	451,301,392	333,086,009
Tax rate	22%	22%
Taxes on income per statutory tax rate	(99,286,306)	(73,278,922)
Tax rate change effect	(703,376)	-
Non-deductible expenses	(1,673,737)	(2,275,138)
Income tax expense	(101,663,419)	(75,554,060)

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

18. EMPLOYMENT TERMINATION BENEFITS

	December 31, 2020	December 31, 2019
Provision for employment termination benefits	21,040,315	15,971,826
Total	21,040,315	15,971,826

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 7,117 (December 31, 2019: TL 6,380) for each year of service as of December 31, 2020.

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:

	December 31, 2020	December 31, 2019
Estimated yearly salary increase rate	8.50%	8.67%
Yearly discount rate	13.5%	13.6%

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

	2020	2019
Opening balance, January 1	15,971,826	11,934,859
Paid during the period	(2,024,847)	(4,134,244)
Service cost	1,735,710	1,369,556
Interest cost	2,155,944	1,624,329
Actuarial loss	3,201,682	5,177,326
Closing balance, December 31	21,040,315	15,971,826

19. DEFERRED EXPENSES

As at December 31, 2020 and 2019; movements of deferred expenses are as follows:

	Restated (Note 1.1)	
	2020	2019
Deferred acquisition costs, gross January 1	444,609,469	393,496,930
Acquisition costs deferred during the period	187.305.143	152.758.932
Amortization	(130,541,948)	(101,646,393)
Deferred acquisition costs - December 31	501,372,664	444,609,469
Deferred commission costs, gross January 1	33,622,456	37,123,339
Commission cost deferred during the period	(10,469,804)	(3,500,883)
Deferred commission costs - December 31	23,152,652	33,622,456
Total deferred expenses	524,525,316	478,231,925

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

20. OTHER PAYABLES AND LIABILITIES

As at December 31, 2020 and December 31, 2019; other payables and liabilities are as follows:

	December 31, 2020	December 31, 2019
Payables to shareholders	60,422,578	264,235
Taxes and funds payable	25,364,003	17,689,835
Payables to suppliers	23,547,642	13,672,113
Payables to related parties	11,047,722	5,233,195
Unused vacation provision	6,467,738	5,943,026
Deferred commission income	1,681,106	2,722,115
Payables to personnel	461,124	520,965
Other deferred income	2,055	2,052
Deposits and guarantees	4,836	3,921
Total	128,998,804	46,051,457

21. INSURANCE CONTRACT LIABILITIES

Insurance contract liabilities as at December 31, 2020 and December 31, 2019; are as follows:

	December 31, 2020	December 31, 2019
a		
Gross insurance contract liabilities		
Life mathematical reserves (*)	2,059,624,778	1,278,324,099
Reserve for unearned premiums	64,925,125	95,871,371
Claims provision	86,835,225	69,621,739
	2,211,385,128	1,443,817,209
	, ,	, , ,
Reinsurance share of insurance contract liabilities		
Mathematical reserves, ceded (Note 7)	1,510,791	1,997,764
Reserve for unearned premiums, ceded (Note 7)	3,245,141	6,516,521
Claims provision, ceded (Note 7)	6,193,687	7,301,642
	10,949,619	15,815,927
Net insurance contract liabilities		
Life mathematical reserves	2,058,113,986	1,276,326,335
Reserve for unearned premiums	61,679,985	89,354,850
Claims provision	80,641,538	62,320,097
Net insurance liabilities	2,200,435,509	1,428,001,282

^(*) As of December 31, 2020, the negative fair value difference of financial assets at insuree's risk amounting to TL 7,017,648 (December 31, 2019: 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 510,244 (December 31, 2019: TL 2,059,572) and reinsurers share of TL 1,510,791. (December 31, 2019: 1,997,764) have been included in the above mentioned mathematical reserve table.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

21. INSURANCE CONTRACT LIABILITIES (Continued)

Movements in insurance liabilities and reinsurance assets

Claims:

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
December 31, 2020			
Reported claims	63,283,232	(4,842,273)	58,440,959
Incurred but not reported	23,551,993	(1,351,414)	22,200,579
Total at the end of the period	86,835,225	(6,193,687)	80,641,538
December 31, 2019	Gross	Ceded	Net
	52 002 000	(5.20.5.2.42)	
Total at the beginning of the year	72,092,000	(6,286,342)	65,805,658
Change during period	(2,470,261)	(1,015,300)	(3,485,561)
Total at the end of the period	69,621,739	(7,301,642)	62,320,097
December 31, 2019			
Reported claims	51,507,851	(5,599,323)	45,908,528
Incurred but not reported	18,113,888	(1,702,319)	16,411,569
	69,621,739	(7,301,642)	62,320,097

Claims paid and change in outstanding claims provision for the period ended December 31, 2020 and 2019 are as follows:

	January 1 - December 31, 2020	January 1 - December 31, 2019
Cash paid for claims settled during the period	200,748,481	127,324,722
- Surrender and maturity from life savings	53,912,217	47,492,423
- Death and disability claims (*)	60,531,393	40,800,205
- Surrender from life protection	86,304,871	39,032,094
Change in outstanding claims provision	18,321,441	(3,485,562)
Claims paid and change in outstanding claims provision	219,069,922	123,839,160

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

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

21. INSURANCE CONTRACT LIABILITIES (Continued)

Reserve for unearned premiums:

December 31, 2020	Gross	Ceded	Net
Passarya for uncorred promiums at the beginning of the year	95,871,371	(6,516,521)	89,354,850
Reserve for unearned premiums at the beginning of the year 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	(3,245,140)	61,679,985
December 31, 2019	Gross	Ceded	Net
Reserve for unearned premiums at the beginning of the year	119,149,509	(4,536,303)	114,613,206
Premiums written during the period	987,754,213	(27,565,423)	960,188,790
Premiums earned during the period	(1,011,032,351)	25,585,205	(985,447,146)
Reserve for unearned premiums at the end of the period	95,871,371	(6,516,521)	89,354,850

Life mathematical reserves

	2020	2019
	Mathematical reserve TL	Mathematical reserve TL
Total at the beginning of the year, January 1	1,293,865,592	761,252,272
Additions	896,079,694	589,036,913
Disposals	(123,813,104)	(56,423,593)
Total at the end of the period, December 31 (*)	2,066,132,182	1,293,865,592

^(*) As of December 31, 2020, the negative fair value difference of financial assets at insuree's risk amounting to TL 7,017,648 (December 31, 2019: 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 510,244 (December 31, 2019: TL 2,059,572) and reinsurers share of TL 1,510,791. (December 31, 2019: 1,997,764) 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 statements.

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 December 31, 2020									86,835,225

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

21. INSURANCE CONTRACT LIABILITIES (Continued)

As at December 31, 2019, claim development table of the Group is as follows:

	2012								
Accident year	and earlier	2013	2014	2015	2016	2017	2018	2019	Total
Current estimate of claims									
Accident year	3,265,507	4,700,993	3,884,552	4,027,782	5,829,895	4,869,959	5,664,402	11,241,309	43,484,399
1 year later	117,632	335,643	1,237,939	729,744	818,815	1,289,702	2,107,395	11,211,307	6,636,870
2 year later	-	4,200	2,067	138,939	194,255	487,378	2,107,373	_	826,839
3 year later	13,080	.,200	13.882	57,126	54,797	.07,570	_	_	138,885
4 year later	-	43	10,895	69,138	5-1,777	_	_	_	80,076
5 year later	_	-	38,660	-	_	_	_	_	38,660
6 year later	_	_	-	_	_	_	_	_	-
7 year later	302,122	-	-	-	-	-	-	-	302,122
Total	3,698,341	5,040,879	5,187,995	5,022,729	6,897,762	6,647,039	7,771,797	11,241,309	51,507,851
Incurred but not reported									18,113,888
Total gross provision for outstanding claims as at									
December 31, 2019									69,621,739

22. EQUITY

Share capital of the Group as at December 31, 2020 and December 31, 2019; are as follows:

	December 31, 2020		December 31, 2019	
	Shareholding Share		Shareholding Shareholding	
	%	TL	%	TL
Hacı Ömer Sabancı Holding A.Ş.	40.00	72,000,007	40.00	72,000,007
Aviva International Holdings Ltd.	40.00	72,000,007	40.00	72,000,007
Other	0.09	166,026	0.09	166,026
Publicly Traded	19.91	35,833,960	19.91	35,833,960
Total share capital	100.00	180,000,000	100.00	180,000,000

Profit and other capital reserves:

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

	December 31, 2020	December 31, 2019
Profit reserves	190,370,612	135,728,079
Other capital reserves	837,095	837,095
Total	191,207,707	136,565,174

Retained earnings as per the statutory consolidated financial statements, 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.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

22. EQUITY (Continued)

Profit reserves

As at December 31, 2020 and December 31, 2019; details of profit reserves is as follows:

	December 31, 2020	December 31, 2019
Extraordinary reserves	110,043,953	80,922,342
Legal reserves	80,315,165	54,794,243
Statutory reserves	11,494	11,494
Total	190,370,612	135,728,079

Movement of profit reserves is presented below:

	December 31, 2020	December 31, 2019
Opening balance, January 1	135,728,079	44,498,235
Transfers	54,642,533	91,229,844
Closing balance	190,370,612	135,728,079

Profit reserves

As of 31 December 2020, the Group's profit reserves consists of 80,315,165 TL (31 December 2019: 54,794,243 TL) legal reserves, 11,494 TL (31 December 2019: 11,494 TL) statue reserves and 110,043,954 TL (31 December 2019: 80,922,342 TL) extraordinary reserves.

Other capital reserves

As of December 31, 2020 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".

Movement of the reserve is below:

	2020	2019
Opening balance, January 1	(294,093)	(39,141,204)
Unrealized gains and losses due to changes in the fair values		
of available for sale financial assets net of taxes	36,896,902	38,847,111
Closing balance, December 31	36,602,809	(294,093)

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

23. EARNINGS PER SHARE

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

	January 1- December 31, 2020	January 1- December 31, 2019(Restated)
Profit for the period	349,637,973	257,531,949
Weighted average number of shares with nominal value of TL 0.01 nominal value per share	18,000,000,000	18,000,000,000
Earnings per share	0.0194	0.0143

As of December 31, 2020 capital of the Group consists of 18,000,000,000 shares with nominal value of TL 0.01 (December, 2019: 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- December 31, 2020				
	Gross	Reinsurer share	Net		
Non-life	65,504,790	(2,191,422)	63,313,368		
Life (Life protection + savings)	1,266,367,504	(16,258,002)	1,250,109,502		
Total premium income	1,331,872,294	(18,449,424)	1,313,422,870		
	Januar				
	Gross	Reinsurer share	Net		
Non-life	82,432,727	(5,523,970)	76,908,757		
Life (Life protection + savings)	905,321,486	(22,041,453)	883,280,033		
Total premium income	987,754,213	(27,565,423)	960,188,790		

25. INCOME GENERATED FROM PENSION BUSINESS

Income generated from pension business for the periods ended December 31, 2020 and December 31, 2019; are as follows:

	January 1- December 31, 2020	January 1- December 31, 2019
Fund management income	339,782,295	254,941,638
Management fee	88,339,206	73,214,146
Deferred entry fees income	24,761,198	35,045,975
Premium holiday charges	497,876	1,607,466
Total	453,380,575	364,809,225

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

26. FOREIGN EXCHANGE GAINS / (LOSSES), NET

Foreign exchange gains / (losses) for the periods ended December 31, 2020 and 2019; are as follows:

	January 1- December 31, 2020	January 1- December 31,2019
Foreign exchange gains	70,197,150	44,209,670
Foreign exchange losses	(68,556,647)	(41,308,860)
Total	1,640,503	2,900,810

27. COMMISSION INCOME AND COMMISSION EXPENSE

Commission income for the periods ended December 31, 2020 and December 31, 2019; are as follows:

	January 1- December 31, 2020	January 1- December 31, 2019
Commission income from reinsurance		_
companies (net)	10,878,811	11,217,587
Total	10,878,811	11,217,587

Commission expense for the periods ended December 31, 2020 and December 31, 2019; are as follows:

	January 1- December 31,2020	January 1-December 31, 2019(Restated)
Commission expenses due to personal accident	(37,073,590)	(25, 202, 001)
insurance Commission expenses due to life insurance	(171,102,327)	(35,292,091) (146,664,388)
-Change in commission expenses	(211,563,458)	(150,837,007)
-Change in deferred acquisition cost	40,461,131	4,172,619
Total	(208,175,917)	(181,956,479)

28. INVESTMENT AND OTHER INCOME

Investment income for the periods ended December 31, 2020 and December 31, 2019; are as follows:

	January 1-	January 1-
	December 31, 2020	December 31, 2019
Interest income	169,082,692	123,019,539
-Income from financial assets at fair value through profit or loss	51,391,605	45,998,673
-Income from available for sale financial assets	117,691,087	77,020,866
Net income from sale of financial assets	33,147,903	(9,111,749)
-Income from financial assets at fair value through profit or loss	(38,158)	(6,591,455)
-Income from available for sale financial assets	33,186,061	(2,520,294)
Dividend and realization income from other		
financial assets	64,230	89,623
Net gains on derivatives fair value through profit or loss	15,120,524	50,099,763
Interest expense regarding lease liabilities	(6,989,482)	(7,043,407)
Investment management expenses	(55,975,214)	1,073,147
Other income, net	4,436,665	4,784,289
Total investment and other income/(expense), net	158,887,318	162,911,205

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

29. PENSION EXPENSES INCLUDING COMMISSION

Pension expenses including commission for the periods ended December 31, 2020 and December 31, 2019; are as follows:

	January 1-	January 1-
	December 31, 2020	December 31, 2019
Fund management shores	(27.215.540)	(27.257.000)
Fund management charge Commission expense, net of DAC	(37,215,540)	(27,257,008) (74,034,186)
- Commission expense	(107,880,641) (118,258,499)	(77,785,582)
- Change in deferred acquisition cost	10,377,858	3,751,396
Takasbank commission expense	(5,752,049)	(5,231,373)
Other expense	(16,211,756)	(15,494,705)
Total pension expenses	(167,059,986)	(122,017,272)

30. GENERAL AND ADMINISTRATIVE EXPENSES

General and administrative expenses for the periods ended December 31, 2020 and December 31, 2019; are as follows:

		Restated
	January 1-	January 1-
	December 31, 2020	December 31, 2019
Personnel expenses	(258,853,730)	(213,569,416)
Outsourced expenses including IT services	(93,516,311)	(67,653,674)
Depreciation and amortization	(39,430,982)	(30,801,197)
Management expenses	(10,667,921)	(9,073,877)
Communication expenses	(5,975,710)	(5,652,380)
Advertising and marketing expenses	(5,034,379)	(2,959,969)
Travelling and transportation expenses	(4,561,491)	(10,745,744)
Representation and hosting expenses	(4,019,075)	(8,788,070)
Brokerage expenses	(3,026,125)	(532,693)
Other marketing, sales and distribution expenses	(1,959,296)	(1,595,277)
Office supplies expenses	(1,876,335)	(3,122,574)
Change in deferred acquisition cost	5,924,206	43,232,135
Other expenses	(13,115,269)	(46,268,075)
Total	(436,112,418)	(357,530,811)

Personnel expenses for the period ended December 31, 2020 and December 31, 2019; are as follows:

	January 1-	January 1-
	December 31, 2020	December 31, 2019
Salaries	(138,599,096)	(119,701,956)
Commission and promotion expenses	(43,966,912)	(36,294,305)
Other salary expenses	(33,517,114)	(17,357,849)
Social security expenses	(26,509,805)	(23,260,517)
Other personnel expenses	(10,888,914)	(11,906,149)
Employee termination benefit expenses	(3,891,653)	(2,997,526)
Unused vacation expenses	(1,303,225)	(1,273,588)
Notice pay expense	(177,011)	(777,526)
Total	(258,853,730)	(213,569,416)

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

31. OTHER INCOME/(EXPENSE), NET

Other income and expenses for the periods ended December 31, 2020 and 2019 are as follows:

	January 1- December 31, 2020	January 1- December 31, 2019
Other income:		
Other technical income	2,317,908	733,892
Other income	-	(9,421)
Other expense:		
Other operating expense	(3,748,583)	(508,780)
Intangible asset write-off	(4,483,171)	(3,335,174)
Other expense	(309,950)	(414,982)
Total other income / (expense), net	(6,223,796)	(3,534,465)

32. BLOCKED SECURITIES AND BANK DEPOSITS

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

	December 31, 2020	December 31, 2019
Blocked securities	2,003,048,058	1,200,246,754
Blocked bank deposits	149,984,068	98,984,103
Total	2,153,032,126	1,299,230,857

33. RELATED PARTY BALANCES AND TRANSACTIONS

As at December 31, 2020 and December 31, 2019 balances with related parties are as follows:

	December 31, 2020	December 31, 2019
Akbank T.A.Ş Credit card receivables	325,956,194	207,104,884
Other cash and cash equivalents	325,956,194	207, 104,884
Akbank T.A.Ş Bank deposit	187,233,011	37,665,000
Banks	187,233,011	37,665,000

As of December 31, 2020 and December 31, 2019, 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:

	December 31, 2020	December 31, 2019
Other receivables from related parties		
Akbank T.A,Ş.	_	3,114,021
Aksigorta A.Ş.	1,024,260	3,114,021
Aksigotu A.Ş.	1,024,200	
	1,024,260	3,114,021

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020 (Amounts expressed in Turkish Lira ("TL") unless otherwise indicated.)

RELATED PARTY BALANCES AND TRANSACTIONS (Continued)

		December	31, 2020	Dece	mber 31, 2019
Receivables from main operations					
Sabancı Üniversitesi			56,163		84,614
Carrefoursa Carrefour Sabancı Ticaret M	Merkezi A S		199		93,337
Other	vicinozi i i.ņ.		(73,999)		(122,365)
3 III 42			(17,637)		55,586
		December 3	31, 2020	Decei	mber 31, 2019
Income accruals for the year Akbank T.A.Ş.			399,486		-
			399,486		
		31 Decembe	<u> </u>		
	Nominal value	Cost	<u>r 2020</u> Fair v	alue	Book value
Private sector bond	10mmu value	Cost	ran v	uruc .	Dook value
Enerjisa Elektrik Dağıtım A.Ş.	12,500,000	12,500,000	19,694	,782	19,694,782
Çimsa Çimento Sanayi Ve Ticaret A.Ş.	4,000,000	4,000,000	4,056		4,056,317
Financial assets	16,500,000	16,500,000	23,751	,099	23,751,099
		31 Decembe	r 2019		
	Nominal value	Cost	Fair va	alue	Book value
Private sector bonds					
Enerjisa Elektrik Dağıtım A.Ş.	17,000,000	17,000,000	23,917,		23,917,204
Çimsa Çimento Sanayi Ve Ticaret A.Ş.	4,000,000	4,000,000	4,015,		4,015,201
Financial assets	21,000,000	21,000,000	27,932,	405	27,932,405
		December	r 31, 2020	Dec	ember 31, 2019
Other payables to related parties					
Sabancı Dijital Teknoloji Hizmetleri A.Ş.		;	8,691,273		3,448,562
EnerjiSA Anadolu Yakası Elektrik Perakene	de Satıs A.S.		80,931		92,558
TeknoSA İç ve Dış Tic, A.Ş.	, ,	126,381			
Carrefoursa Carrefour Sabancı Ticaret Merl	kezi A.Ş.		800,254		-
EnerjiSA Başkent Elektrik Perakende Satış	A.Ş.		262		-
Vista Turizm ve Seyahat A.Ş.		(4,529)			143,334
Ak Sigorta A.Ş.			408,050		471,577
Ak Portföy Yönetimi A.Ş.			945,100		917,164
		1	1,047,722		5,073,195
		December	31, 2020	Dec	ember 31, 2019
Advances given			(07.572		
Vista Turizm ve Seyahat A.Ş.			687,573		
			687,573		-

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

33. RELATED PARTY BALANCES AND TRANSACTIONS (Continued)

	December 31, 2020	December 31, 2019
Payables from main operations		
Akbank T.A.Ş	29,117,799	42,251,264
Ak Portföy Yönetimi A.Ş.	5,686,009	3,718,833
Emeklilik Gözetim Merkezi A.Ş.	312,857	266,544
	35,116,665	46,236,641
	December 31, 2020	December 31, 2019
Expense accruals		
Akbank T.A.Ş.	_	160,000
Aviva International Holdings Ltd.	_	93,318
1111/4 International Holdings Etc.	-	253,318
	December 31, 2020	December 31, 2019
Income accruals for the month		
Akbank T.A.Ş.	24,088,392	<u>-</u>
	24,088,392	-
_	December 31, 2020	December 31, 2019
Shareholders:		,
Hacı Ömer Sabancı Holding	103,557	21,884
Other	-	242,351
Payables to shareholders	103,557	264,235
a		
Shareholders:		20 7.00
Aviva International Holdings Ltd.	547,351	23,568
Receivables from shareholders	547,351	23,568

Transactions with related parties for the period ended December 31, 2020 and December 31, 2019 are as follows:

	1 January-	1 January-
	31 December 2020	31 December 2019
Services Purchased		
Akbank T.A.Ş.	285,013,503	239,773,562
- Commission paid	283,113,503	237,690,864
- Paid administrative expenses	1,900,000	2,082,698
Sabancı Dijital Teknoloji Hizmetleri A.Ş.	43,071,729	31,178,864
Ak Portföy Yönetimi A.Ş.	38,160,640	27,475,747
Emeklilik Gözetim Merkezi A.Ş.	3,780,964	3,262,814
Vista Turizm ve Seyahat A.Ş.	1,841,001	7,685,017
AkSigorta A.Ş.	763,994	5,169,769
Anadolu Yakası Elektrik Dağıtım A.Ş.	892,308	1,002,355
Teknosa İç ve Dış Ticaret A.Ş.	618,576	452,937
EnerjiSA Elektrik Enerjisi Toptan Satış	· -	9,626
Other	1,609,856	1,180,496
	375,752,571	317,191,187

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

33. RELATED PARTY BALANCES AND TRANSACTIONS (Continued)

	1 January-	1 January-
	31 December 2020	31 December 2019
Financial income		
Akbank (interest income)	40,811,921	32,250,069
Enerjisa Enerji A.Ş.	1,033,150	1,074,450
Çimsa Çimento San,ve Tic, A.Ş.	336,540	520,375
Ak Finansal Kiralama A.Ş.	<u> </u>	1,528,500
	42,181,611	35,373,394
	1 January–	1 January-
	31 December 2020	31 December 2019
Services Provided		
Akbank T.A.Ş. and subsidiaries	13,326,676	12,987,596
Enerjisa Elektrik Üretim A.Ş. and subsidiaries	1,435,443	1,306,668
Kordsa Global Endüstriyel İplik ve Kordbezi San. ve Tic A.Ş.	889,296	744,46
Brisa Bridgestone Sabancı Lastik Sanayi ve Ticaret A.Ş.	722,396	629,69
Enerjisa Enerji Üretim A.Ş. ve subsidiaries	393,589	348,569
Çimsa Çimento Sanayi ve Ticaret A.Ş.and subsidiaries	387,333	329,62
Akçansa Çimento Sanayi ve Ticaret A.Ş.and subsidiaries	302,891	263,786
Aksigorta A.Ş.	286,067	244,830
Temsa Global Sanayi and Ticaret A.Ş.and subsidiaries	281,263	497,059
Teknosa İç ve Dış Ticaret A.Ş. and subsidiaries	210,631	172,34
Sabancı Üniversitesi	205,539	195,28
Sabancı Dijital Teknoloji Hizmetleri A.Ş.	205,267	164,559
Yünsa Yünlü Sanayi ve Ticaret A.Ş.	-	142,91
Exsa Export Sanayi Mamülleri Satış ve Araştırma A.Ş.	10,548	8,833
Other	229,392	239,155
	18,886,331	18,275,381

Benefits provided to executive management

For the period ended December 31, 2020 and 2019, 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 11,670,933 and TL 11,152,205 respectively.

34. CONTINGENCIES

Provision for lawsuits

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

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE PERIOD ENDED DECEMBER 31, 2020

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

34. CONTINGENCIES (Continued)

Provision for lawsuits (Continued)

As at December 31, 2020 and December 31, 2019; provisions for lawsuits against the Group are as follows:

	December 31, 2020	December 31, 2019
T 1/2 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	11 200 100	10 455 300
Lawsuits provision under other provision:	11,366,186	10,457,200
Insurance lawsuits against the Group	5,995,183	5,264,549
Business lawsuits against the Group	2,740,710	2,562,358
Other lawsuits against the Group	2,630,293	2,630,293
Lawsuits provision under claims provision	34,459,548	24,938,607
Total lawsuits provision	45,825,734	35,395,807

35. COMMITMENTS

As at December 31, 2020 and December 31, 2019, total insurance risk accepted by the Group under normal courses of the insurance business is detailed in Note 4.

As at December 31, 2020 and December 31, 2019, letters of guarantee given to suppliers and government institutions are as follows:

	December 31, 2020	December 31, 2019
Letters of guarantee	9,217,397	9,723,771
Total	9,217,397	9,723,771

36. SUBSEQUENT EVENTS

The Group's consolidated financial statements as of 31 December 2020 is approved at 8 February 2021 by the Board of Directors.

In the Board of Directors meeting of the company dated 3 February 2021, since the registered capital ceiling validity period of the company has expired at the end of 2020, within the framework of the provisions of the Registered Capital System Communiqué of the Capital Markets Board No. II-18.1, it has been decided to extend the validity period of the registered capital ceiling for a new five-year period to be valid for the years 2021-2025 and to determine the registered capital ceiling amount as TL 500,000,000., to accept the amendment text regarding the amendments planned to be made in Articles 6 and 13 of our Company's Articles of Association within the framework of the Turkish Commercial Code No. 6102 and the Capital Markets Law No. 6362 and other legislation. , to apply to the Capital Markets Board, T.C. Ministry of Treasury and Finance and the Ministry of Trade in order to obtain the necessary permissions and approvals for the amendment text.

As explained in note 2.6, the Company paid the second installment of dividend payment in January 6 and January 8, 2021.

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