

(Convenience translation of financial statements and footnotes
originally issued in Turkish)

Aksigorta Anonim Őirketi

Financial Statements as of September 30, 2019

AKSIGORTA ANONİM ŐIRKETİ

**CONVENIENCE TRANSLATION OF THE COMPANY’S REPRESENTATION ON THE
FINANCIAL STATEMENT PREPARED AS AT 30 SEPTEMBER 2019**

We confirm that the accompanying financial statements and notes to these financial statements as of 30 September 2019 are prepared in accordance with the accounting principles and standards as set out in the insurance legislation and in conformity with the provisions of the Decree on “Financial Reporting of Insurance and Reinsurance Companies and Pension Funds” and our Company’s accounting records.

İstanbul, October 25, 2019

Osman AKKOCA
Chief Financial Officer

Uğur GÜLEN
Chief Executive Officer

Halil KOLBAŐI
Actuary
Licence No: 72

Seza TANINMIŐ ÖZGÜR
Accounting Manager

AKSIGORTA A.Ş.
**CONVENIENCE TRANSLATION OF THE BALANCE SHEET
AT SEPTEMBER 30, 2019**

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

ASSETS			
I- CURRENT ASSETS	Note	Reviewed	Audited
		Current Period (30/09/2019)	Previous Period (31/12/2018)
A- Cash and Cash Equivalents	14	2.210.666.579	1.969.568.662
1- Cash		-	-
2- Cheques Received		-	-
3- Banks	14	1.607.739.176	1.485.633.722
4- Cheques Given and Payment Orders (-)		-	-
5- Receivables From Credit Cards with Bank Guarantee Due Less Than Three Months	14	602.927.403	483.934.940
6- Other Cash and Cash Equivalents		-	-
B- Financial Assets and Investments with Risks on Policy Holders	11 1	787.361.940	559.873.665
1- Financial Assets Available for Sale	11 1	599.054.697	379.629.308
2- Financial Assets Held to Maturity		47.629.402	9.752.674
3- Financial Assets Held for Trading		138.954.740	168.805.442
4- Loans		-	-
5- Provision for Loans (-)		-	-
6- Investments with Risks on Policy Holders	11 1	1.723.101	1.686.241
7- Equity Shares		-	-
8- Impairment in Value of Financial Assets (-)		-	-
C- Receivables From Main Operations	12 1	615.411.134	600.837.632
1- Receivables From Insurance Operations	12 1	622.038.159	603.065.523
2- Provision for Receivables From Insurance Operations (-)	12 1	(27.863.574)	(11.935.533)
3- Receivables From Reinsurance Operations		-	-
4- Provision for Receivables From Reinsurance Operations (-)		(1.596.150)	-
5- Cash Deposited For Insurance & Reinsurance Companies	12 1	30.954	30.954
6- Loans to Policyholders		-	-
7- Provision for Loans to Policyholders (-)		-	-
8- Receivables from Pension Operation		-	-
9- Doubtful Receivables From Main Operations	12 1	136.166.052	116.410.789
10- Provisions for Doubtful Receivables From Main Operations (-)	12 1	(113.364.307)	(106.734.101)
D- Due from Related Parties		160.153	126.885
1- Due from Shareholders		-	-
2- Due from Affiliates		-	-
3- Due from Subsidiaries		-	-
4- Due from Joint Ventures		-	-
5- Due from Personnel		-	-
6- Due from Other Related Parties		160.153	126.885
7- Rediscount on Receivables Due from Related Parties (-)		-	-
8- Doubtful Receivables Due from Related Parties		-	-
9- Provisions for Doubtful Receivables Due from Related Parties (-)		-	-
E- Other Receivables		14.766.377	20.668.330
1- Leasing Receivables		-	-
2- Unearned Leasing Interest Income (-)		-	-
3- Deposits and Guarantees Given		716.558	518.123
4- Other Receivables	47	14.049.819	20.150.207
5- Discount on Other Receivables (-)		-	-
6- Other Doubtful Receivables		-	-
7- Provisions for Other Doubtful Receivables (-)		-	-
F- Prepaid Expenses and Income Accruals	4 2 2	302.570.774	261.130.832
1- Deferred Commission Expenses	17	244.716.599	222.173.395
2- Accrued Interest and Rent Income		10.868	-
3- Income Accruals		55.198.069	33.895.401
4- Other Prepaid Expenses	47	2.645.238	5.062.036
G- Other Current Assets	4 2 2	3.102.916	5.635.630
1- Inventories		22	22
2- Prepaid Taxes and Funds		2.988.066	5.416.876
3- Deferred Tax Assets		-	-
4- Business Advances		113.162	-
5- Advances Given to Personnel		1.666	218.732
6- Stock Count Differences		-	-
7- Other Current Assets		-	-
8- Provision for Other Current Assets (-)		-	-
I- Total Current Assets		3.934.039.873	3.417.841.636

The accompanying notes form an integral part of these financial statements.

CONVENIENCE TRANSLATION OF THE BALANCE SHEET AT SEPTEMBER 30, 2019

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

ASSETS			
II- NON CURRENT ASSETS	Note	Reviewed	Audited
		Current Period (30/09/2019)	Previous Period (31/12/2018)
A- Receivables From Main Operations		-	-
1- Receivables From Insurance Operations		-	-
2- Provision for Receivables From Insurance Operations (-)		-	-
3- Receivables From Reinsurance Operations		-	-
4- Provision for Receivables From Reinsurance Operations (-)		-	-
5- Cash Deposited for Insurance & Reinsurance Companies		-	-
6- Loans to Policyholders		-	-
7- Provision for Loans to Policyholders (-)		-	-
8- Receivables From Pension Operations		-	-
9- Doubtful Receivables from Main Operations		-	-
10- Provision for Doubtful Receivables from Main Operations		-	-
B- Due from Related Parties		-	-
1- Due from Shareholders		-	-
2- Due from Affiliates		-	-
3- Due from Subsidiaries		-	-
4- Due from Joint Ventures		-	-
5- Due from Personnel		-	-
6- Due from Other Related Parties		-	-
7- Discount on Receivables Due from Related Parties (-)		-	-
8- Doubtful Receivables Due from Related Parties		-	-
9- Provisions for Doubtful Receivables Due from Related Parties (-)		-	-
C- Other Receivables		-	-
1- Leasing Receivables		-	-
2- Unearned Leasing Interest Income (-)		-	-
3- Deposits and Guarantees Given		-	-
4- Other Receivables		-	-
5- Discount on Other Receivables (-)		-	-
6- Other Doubtful Receivables		-	-
7- Provisions for Other Doubtful Receivables (-)		-	-
D- Financial Assets		-	-
1- Investments In Associates		-	-
2- Affiliates	9 and 11.4	-	30.116.653
3- Capital Commitments to Affiliates (-)		-	-
4- Subsidiaries		-	-
5- Capital Commitments to Subsidiaries (-)		-	-
6- Joint Ventures		-	-
7- Capital Commitments to Joint Ventures (-)		-	-
8- Financial Assets and Investments with Risks on Policy Holders		-	-
9- Other Financial Assets		-	-
10- Diminution in Value of Financial Assets (-)	11.4	-	(30.116.653)
E- Tangible Fixed Assets	6 and 7	47.453.034	24.329.768
1- Investment Properties	7	170.958	-
2- Diminution in Value for Investment Properties (-)		-	-
3- Owner Occupied Properties	6	1.598.569	1.598.569
4- Machinery and Equipments		-	-
5- Furnitures and Fixtures	6	25.285.019	23.390.144
6- Vehicles		2.720.001	2.720.001
7- Other Tangible Assets (Including Leasehold Improvements)	6	21.078.170	21.052.437
8- Leased Tangible Fixed Assets	6	31.356.357	351.395
9- Accumulated Depreciation (-)	6 and 7	(34.756.040)	(24.782.778)
10- Advances Paid for Tangible Fixed Assets (Including Construction In Progresses)		-	-
F- Intangible Fixed Assets	8	58.225.969	55.639.894
1- Rights	8	126.264.213	111.808.560
2- Goodwill		-	-
3- Establishment Costs		-	-
4- Research and Development Expenses		-	-
5- Other Intangible Assets		-	-
6- Accumulated Amortizations (-)	8	(71.669.264)	(58.117.829)
7- Advances Regarding Intangible Assets	8	3.631.020	1.949.163
G- Prepaid Expenses and Income Accruals		149.980	149.980
1- Deferred Commission Expenses		-	-
2- Accrued Interest and Rent Income		-	-
3- Other Prepaid Expenses	47	149.980	149.980
H- Other Non-current Assets		2.874.378	16.972.963
1- Effective Foreign Currency Accounts		-	-
2- Foreign Currency Accounts		-	-
3- Inventories		-	-
4- Prepaid Taxes and Funds		-	-
5- Deferred Tax Assets	35	2.874.378	16.972.963
6- Other Non-current Assets		-	-
7- Other Non-current Assets Amortization (-)		-	-
8- Provision for Other Non-current Assets (-)		-	-
II- Total Non-current Assets		108.703.361	97.092.605
TOTAL ASSETS (I+II)		4.042.743.234	3.514.934.241

AKSIGORTA A.Ş.

**CONVENIENCE TRANSLATION OF THE BALANCE SHEET
AT SEPTEMBER 30, 2019**

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

ASSETS			
II- NON CURRENT ASSETS	Note	Reviewed Current Period (30/09/2018)	Audited Previous Period (31/12/2017)
A- Receivables From Main Operations		-	-
1- Receivables From Insurance Operations		-	-
2- Provision for Receivables From Insurance Operations (-)		-	-
3- Receivables From Reinsurance Operations		-	-
4- Provision for Receivables From Reinsurance Operations (-)		-	-
5- Cash Deposited for Insurance & Reinsurance Companies		-	-
6- Loans to Policyholders		-	-
7- Provision for Loans to Policyholders (-)		-	-
8- Receivables From Pension Operations		-	-
9- Doubtful Receivables from Main Operations		-	-
10- Provision for Doubtful Receivables from Main Operations		-	-
B- Due from Related Parties		-	-
1- Due from Shareholders		-	-
2- Due from Affiliates		-	-
3- Due from Subsidiaries		-	-
4- Due from Joint Ventures		-	-
5- Due from Personnel		-	-
6- Due from Other Related Parties		-	-
7- Discount on Receivables Due from Related Parties (-)		-	-
8- Doubtful Receivables Due from Related Parties		-	-
9- Provisions for Doubtful Receivables Due from Related Parties (-)		-	-
C- Other Receivables		-	-
1- Leasing Receivables		-	-
2- Unearned Leasing Interest Income (-)		-	-
3- Deposits and Guarantees Given		-	-
4- Other Receivables		-	-
5- Discount on Other Receivables (-)		-	-
6- Other Doubtful Receivables		-	-
7- Provisions for Other Doubtful Receivables (-)		-	-
D- Financial Assets		-	-
1- Investments In Associates		-	-
2- Affiliates	9 and 11.4	30.116.653	30.116.653
3- Capital Commitments to Affiliates (-)		-	-
4- Subsidiaries		-	-
5- Capital Commitments to Subsidiaries (-)		-	-
6- Joint Ventures		-	-
7- Capital Commitments to Joint Ventures (-)		-	-
8- Financial Assets and Investments with Risks on Policy Holders		-	-
9- Other Financial Assets		-	-
10- Diminution in Value of Financial Assets (-)	11.4	(30.116.653)	(30.116.653)
E- Tangible Fixed Assets	6 and 7	22.927.738	26.277.477
1- Investment Properties	7	-	80.126
2- Diminution in Value for Investment Properties (-)		-	-
3- Owner Occupied Properties	6	1.598.569	1.598.569
4- Machinery and Equipments		-	-
5- Furnitures and Fixtures	6	23.817.062	23.605.872
6- Vehicles		-	-
7- Other Tangible Assets (Including Leasehold Improvements)	6	21.052.437	21.412.252
8- Leased Tangible Fixed Assets	6	351.395	351.395
9- Accumulated Depreciation (-)	6 and 7	(23.891.725)	(20.770.737)
10- Advances Paid for Tangible Fixed Assets (Including Construction In Progresses)		-	-
F- Intangible Fixed Assets	8	46.130.019	46.544.719
1- Rights	8	96.790.160	87.041.349
2- Goodwill		-	-
3- Establishment Costs		-	-
4- Research and Development Expenses		-	-
5- Other Intangible Assets		-	-
6- Accumulated Amortizations (-)	8	(54.161.315)	(43.097.276)
7- Advances Regarding Intangible Assets	8	3.501.174	2.600.646
G- Prepaid Expenses and Income Accruals		149.980	2.963.592
1- Deferred Commission Expenses		-	-
2- Accrued Interest and Rent Income		-	-
3- Other Prepaid Expenses	47	149.980	2.963.592
H- Other Non-current Assets		21.077.438	9.702.374
1- Effective Foreign Currency Accounts		-	-
2- Foreign Currency Accounts		-	-
3- Inventories		-	-
4- Prepaid Taxes and Funds		-	-
5- Deferred Tax Assets	35	21.077.438	9.702.374
6- Other Non-current Assets		-	-
7- Other Non-current Assets Amortization (-)		-	-
8- Provision for Other Non-current Assets (-)		-	-
II- Total Non-current Assets		90.285.175	85.488.162
TOTAL ASSETS (I+II)		3.257.207.239	2.712.767.764

The accompanying notes form an integral part of these financial statements.

AKSIGORTA A.Ş.
**CONVENIENCE TRANSLATION OF THE BALANCE SHEET
AT SEPTEMBER 30, 2019**

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

LIABILITIES			
III- SHORT TERM LIABILITIES	Note	Reviewed	Audited
		Current Period (30/09/2019)	Previous Period (31/12/2018)
A- Borrowings		12.877.706	58.448.710
1- Loans to Financial Institutions		-	-
2- Finance Lease Payables		9.917.010	-
3- Deferred Finance Lease Borrowing Costs (-)		(8.669.902)	-
4- Current Portion of Long Term Borrowings		-	-
5- Principal Installments and Interests on Issued Bills (Bonds)		-	-
6- Other Financial Assets Issued		-	-
7- Value Differences on Issued Financial Assets (-)		-	-
8- Other Financial Borrowings (Liabilities)		11.630.598	58.448.710
B- Payables From Main Operations		459.134.799	418.719.301
1- Payables Due to Insurance Operations	19.1	459.134.799	418.719.301
2- Payables Due to Reinsurance Operations		-	-
3- Cash Deposited by Insurance & Reinsurance Companies		-	-
4- Payables Due to Pension Operations		-	-
5- Payables from Other Operations		-	-
6- Rediscount on Other Payables From Main Operations (-)		-	-
C- Due to Related Parties		220.205	254.558
1- Due to Shareholders		1.143	1.143
2- Due to Affiliates		-	-
3- Due to Subsidiaries		-	-
4- Due to Joint Ventures		-	-
5- Due to Personnel		219.062	253.415
6- Due to Other Related Parties		-	-
D- Other Payables	19.1	113.263.028	132.714.389
1- Deposits and Guarantees Received		1.640.258	-
2- Due to SSI regarding Treatment Expenses	19.1	34.352.890	28.112.544
3- Other Payables	19.1	77.269.880	104.601.845
4- Discount on Other Payables (-)		-	-
E- Insurance Technical Reserves		2.296.981.875	1.910.327.687
1- Unearned Premiums Reserve - Net	20	1.218.308.119	1.040.175.238
2- Unexpired Risk Reserves - Net	20	16.875.560	20.653.057
3- Mathematical Reserves - Net		-	-
4- Outstanding Claims Reserve - Net	4.1 and 20	1.061.777.124	849.402.337
5- Provision for Bonus and Discounts - Net	20	21.072	97.055
6- Other Technical Reserves - Net		-	-
F- Taxes and Other Liabilities and Relevant Provisions		56.865.565	44.131.441
1- Taxes and Dues Payable		30.008.469	31.716.632
2- Social Security Premiums Payable	23.1	238.626	168.325
3- Overdue, Deferred or By Installment Taxes and Other Liabilities		-	-
4- Other Taxes and Liabilities		4.977	4.977
5- Corporate Tax Liability Provision on Period Profit	35	80.481.424	66.694.754
6- Prepaid Taxes and Other Liabilities on Period Profit (-)	35	(53.867.931)	(54.453.247)
7- Provisions for Other Taxes and Liabilities		-	-
G- Provisions for Other Risks		85.174.548	40.333.473
1- Provision for Employment Termination Benefits		-	-
2- Pension Fund Deficit Provision		-	-
3- Provisions for Costs	19.1 and 23.4	85.174.548	40.333.473
H- Deferred Income and Expense Accruals	19.1	102.744.813	101.719.094
1- Deferred Commission Income	19.1	102.496.501	101.508.921
2- Expense Accruals		-	-
3- Other Deferred Income	19.1	248.312	210.173
I- Other Short Term Liabilities		235	235
1- Deferred Tax Liability		-	-
2- Inventory Count Differences		-	-
3- Other Short Term Liabilities		235	235
III - Total Short Term Liabilities		3.127.262.774	2.706.648.888

The accompanying notes form an integral part of these financial statements.

AKSIGORTA A.Ş.

**CONVENIENCE TRANSLATION OF THE BALANCE SHEET
AT SEPTEMBER 30, 2019**

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

LIABILITIES			
IV- LONG TERM LIABILITIES	Note	Reviewed Current Period (30/09/2019)	Audited Previous Period (31/12/2018)
A- Borrowings		26.666.784	-
1- Loans to Financial Institutions		-	-
2- Finance Lease Payables		39.056.386	-
3- Deferred Finance Lease Borrowing Costs (-)		(12.389.602)	-
4- Bonds Issued		-	-
5- Other Issued Financial Assets		-	-
6- Value Differences on Issued Financial Assets (-)		-	-
7- Other Financial Borrowings (Liabilities)		-	-
B- Payables From Main Operations		-	-
1- Payables Due to Insurance Operations		-	-
2- Payables Due to Reinsurance Operations		-	-
3- Cash Deposited by Insurance & Reinsurance Companies		-	-
4- Payables Due to Pension Operations		-	-
5- Payables from Other Operations		-	-
6- Discount on Other Payables From Main Operations (-)		-	-
C- Due to Related Parties		-	-
1- Due to Shareholders		-	-
2- Due to Affiliates		-	-
3- Due to Subsidiaries		-	-
4- Due to Joint Ventures		-	-
5- Due to Personnel		-	-
6- Due to Other Related Parties		-	-
D- Other Payables		-	-
1- Deposits and Guarantees Received		-	-
2- Due to SSI regarding Treatment Expenses		-	-
3- Other Payables		-	-
4- Discount on Other Payables (-)		-	-
E- Insurance Technical Reserves		92.731.243	83.822.206
1- Unearned Premiums Reserve - Net		-	-
2- Unexpired Risk Reserves - Net		-	-
3- Mathematical Reserves - Net	17, 2 and 20	1.447.883	1.473.636
4- Outstanding Claims Reserve - Net		-	-
5- Provision for Bonus and Discounts - Net		-	-
6- Other Technical Reserves - Net	20	91.283.360	82.348.570
F- Other Liabilities and Provisions		-	-
1- Other Liabilities		-	-
2- Overdue, Deferred or By Installment Other Liabilities		-	-
3- Other Liabilities and Expense Accruals		-	-
G- Provisions for Other Risks		7.301.102	6.503.684
1- Provision for Employment Termination Benefits	22	7.301.102	6.503.684
2- Provisions for Employee Pension Fund Deficits		-	-
H- Deferred Income and Expense Accruals		-	-
1- Deferred Commission Income		-	-
2- Expense Accruals		-	-
3- Other Deferred Income		-	-
I- Other Long Term Liabilities		-	-
1- Deferred Tax Liability		-	-
2- Other Long Term Liabilities		-	-
IV- Total Long Term Liabilities		126.699.129	90.325.890

The accompanying notes form an integral part of these financial statements.

AKSIGORTA A.Ş.

**CONVENIENCE TRANSLATION OF THE BALANCE SHEET
AT SEPTEMBER 30, 2019**

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

SHAREHOLDERS' EQUITY			
V- SHAREHOLDERS' EQUITY	Note	Reviewed	Audited
		Current Period (30/09/2019)	Previous Period (31/12/2018)
A- Paid in Capital		306.000.000	306.000.000
1- (Nominal) Capital	15	306.000.000	306.000.000
2- Unpaid Capital (-)		-	-
3- Positive Inflation Adjustment on Capital		-	-
4- Negative Inflation Adjustment on Capital (-)		-	-
5- Unregistered Capital		-	-
B- Capital Reserves		90.989.327	95.377.201
1- Equity Share Premiums		-	-
2- Cancellation Profits of Equity Shares		-	-
3- Profit on Sale to be Transferred to Capital	15	90.989.327	95.377.201
4- Translation Reserves		-	-
5- Other Capital Reserves		-	-
C- Profit Reserves		46.439.959	2.612.715
1- Legal Reserves	15	45.882.288	15.835.334
2- Statutory Reserves		62	62
3- Extraordinary Reserves		1.018.015	1.018.015
4- Special Funds (Reserves)	15, 22 and 34.5	(4.640.829)	(3.602.019)
5- Revaluation of Financial Assets	16,1	4.180.423	(10.638.677)
6- Other Profit Reserves		-	-
D- Previous Years' Profits		86.350.467	86.350.467
1- Previous Years' Profits		86.350.467	86.350.467
E- Previous Years' Losses (-)		-	-
1- Previous Years' Losses		-	-
F- Net Profit of the Period	37	259.001.578	227.619.080
1- Net Profit of the Period		259.001.578	227.619.080
2- Net Loss of the Period (-)		-	-
3- Net Income not subject to distribution		-	-
Total Shareholders' Equity		788.781.331	717.959.463
Total Liabilities and Shareholders' Equity (III+IV+V)		4.042.743.234	3.514.934.241

The accompanying notes form an integral part of these financial statements.

CONVENIENCE TRANSLATION OF THE STATEMENT OF INCOME FOR THE PERIOD JANUARY 1 – SEPTEMBER 30, 2019

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

I-TECHNICAL PART	Note	Unreviewed	Unreviewed	Unaudited	Unaudited
		Current Period 01/01/2019-	Current Period 01/07/2019-	Current Period 01/01/2018-30/09/2018	Previous Period 01/07/2018-30/09/2018
A- Non-Life Technical Income		1.992.027.141	701.884.198	1.578.390.304	589.827.053
1- Earned Premiums (Net of Reinsurer Share)		1.615.997.556	578.079.185	1.337.230.837	477.564.236
1.1 - Written Premiums (Net of Reinsurer Share)	24	1.790.352.941	643.143.477	1.419.460.070	498.076.497
1.1.1 - Gross Written Premiums (+)	24	3.117.582.477	974.817.365	2.446.498.796	770.416.893
1.1.2 - Ceded Premiums to Reinsurers (-)	17.16 ve 24	(1.234.477.956)	(297.299.075)	(954.812.029)	(246.366.944)
1.1.3 - Ceded Premiums to SSI (-)	17.16 ve 24	(92.751.580)	(34.374.813)	(72.226.697)	(25.973.452)
1.2- Change in Unearned Premiums Reserve (Net of Reinsurers Shares and		(178.132.882)	(66.627.952)	(72.104.059)	(17.121.168)
1.2.1 - Unearned Premiums Reserve (-)	20	(302.064.711)	29.460.383	(177.676.358)	48.957.141
1.2.2 - Reinsurance Share of Unearned Premiums Reserve (+)	17.16 ve 20	110.917.730	(101.326.154)	83.850.664	(69.470.505)
1.2.3 - SSI of Unearned Premiums Reserve (+)	17.16 ve 20	13.014.099	5.237.819	14.721.599	3.392.196
1.3- Changes in Unexpired Risks Reserve (Net of Reinsurer Share and		3.777.497	1.563.660	(3.125.138)	(3.391.093)
1.3.1 - Unexpired Risks Reserve (-)	20	(13.032.245)	49.663.874	8.995.503	18.724.641
1.3.2 - Reinsurance Share of Unexpired Risks Reserve (+)	17.16 ve 20	16.809.742	(48.100.214)	(12.120.641)	(22.115.734)
2- Investment Income Transferred from Non-Technical Part		356.368.586	115.050.502	227.405.132	110.161.776
3- Other Technical Income (Net of Reinsurer Share)		3.587.017	1.195.497	2.939.183	979.630
3.1 - Gross Other Technical Income (+)		3.587.017	1.195.497	2.939.183	979.630
3.2 - Reinsurance Share of Other Technical Income (-)		-	-	-	-
4- Accrued Subrogation and Salvage Income (+)		16.073.982	7.559.014	10.815.152	1.121.411
B- Non-Life Technical Expense (-)		(1.566.555.951)	(557.538.724)	(1.305.193.005)	(473.649.296)
1- Total Claims (Net of Reinsurer Share)		(1.121.450.346)	(401.358.321)	(930.031.570)	(346.791.126)
1.1- Claims Paid (Net of Reinsurer Share)		(909.082.917)	(318.183.329)	(719.252.693)	(239.230.020)
1.1.1 - Gross Claims Paid (-)		(1.274.154.719)	(423.443.320)	(998.783.629)	(331.610.809)
1.1.2 - Reinsurance Share of Claims Paid (+)	17	365.071.802	105.259.991	279.530.936	92.380.789
1.2- Changes in Outstanding Claims Reserve (Net of Reinsurer Share and		(212.367.429)	(83.174.992)	(210.778.877)	(107.561.106)
1.2.1 - Outstanding Claims Reserve (-)		(858.484.028)	(522.782.566)	(720.261.485)	(426.739.518)
1.2.2 - Reinsurance Share of Outstanding Claims Reserve (+)	17	646.116.599	439.607.574	509.482.608	319.178.412
2- Changes in Bonus and Discount Reserve (Net of Reinsurer Share and		75.983	(2.846)	(87.590)	8.863
2.1 - Bonus and Discount Reserve (-)	20	59.232.783	(1.218.365)	(69.666.248)	(16.510.678)
2.2 - Reinsurance Share of Bonus and Discount Reserve (+)	17.16 ve 20	(59.156.800)	1.215.519	69.578.658	16.519.541
3- Changes in Other Technical Reserves (Net of Reinsurer Share and		(8.934.790)	(1.793.045)	(7.491.228)	(1.972.242)
4- Operating Expenses (-)	32	(372.829.360)	(129.970.806)	(327.068.421)	(110.787.359)
5- Changes in Mathematical Reserves (Net of Reinsurer Share and Reserves		-	-	-	-
5.1- Mathematical Reserves (-)		-	-	-	-
5.2- Reinsurance Share of Mathematical Reserves (+)		-	-	-	-
6- Other Technical Expenses (-)	47	(63.417.438)	(24.413.706)	(40.514.196)	(14.107.432)
6.1 - Gross Other Technical Expenses (-)	47	(63.417.438)	(24.413.706)	(40.514.196)	(14.107.432)
6.2 - Reinsurance Share of Other Technical Expenses (+)		-	-	-	-
C- Non Life Technical Net Profit (A-B)		425.471.190	144.345.474	273.197.299	116.177.757
D- Life Technical Income		98.209	32.613	101.932	33.296
1- Earned Premiums (Net of Reinsurer Share)		-	-	500	-
1.1 - Written Premiums (Net of Reinsurer Share)	24	-	-	500	-
1.1.1 - Gross Written Premiums (+)		-	-	500	-
1.1.2 - Ceded Premiums to Reinsurers (-)	17	-	-	-	-
1.2- Change in Unearned Premiums Reserve (Net of Reinsurers Shares and		-	-	-	-
1.2.1 - Unearned Premium Reserves (-)		-	-	-	-
1.2.2 - Unearned Premium Reserves Reinsurer Share (+)	17	-	-	-	-
1.3- Changes in Unexpired Risks Reserve (Net of Reinsurer Share and		-	-	-	-
1.3.1 - Unexpired Risks Reserves (-)		-	-	-	-
1.3.2 - Unexpired Risks Reserves Reinsurer Share (+)		-	-	-	-
2- Life Branch Investment Income		98.209	32.613	101.432	33.296
3- Unrealized Income from Investments		-	-	-	-
4- Other Technical Income (Net of Reinsurer Share) (+/-)		-	-	-	-
4.1 - Gross Other Technical Income (+/-)		-	-	-	-
4.2 - Reinsurance Share of Other Technical Income (+/-)		-	-	-	-
5- Accrued Subrogation and Salvage Income (+)		-	-	-	-
E- Life Technical Expense		(105.327)	(33.000)	(108.988)	(33.090)
1- Total Claims (Net of Reinsurer Share)		(131.081)	(37.687)	(240.927)	(37.344)
1.1- Claims Paid (Net of Reinsurer Share)		(123.723)	(33.989)	(311.257)	(37.941)
1.1.1 - Gross Claims Paid (-)		(123.723)	(33.989)	(311.257)	(37.941)
1.1.2 - Claims Paid Reinsurer Share (+)		-	-	-	-
1.2- Changes in Outstanding Claims Provisions (Net of Reinsurer Share and		(7.358)	(3.698)	70.330	597
1.2.1 - Outstanding Claims Reserve (-)	29	(7.358)	(3.698)	70.330	597
1.2.2 - Reinsurance Share of Outstanding Claims Reserve (+)	17	-	-	-	-
2- Changes in Bonus and Discount Reserve (Net of Reinsurer Share and		-	-	-	-
2.1 - Bonus and Discount Reserve (-)		-	-	-	-
2.2 - Reinsurance Share of Bonus and Discount Reserve (+)		-	-	-	-
3- Changes in Mathematical Reserves (Net of Reinsurer Share and Reserves		25.754	4.687	131.939	4.254
3.1- Mathematical Reserves (-)		25.754	4.687	131.939	4.254
3.1.1- Actuarial Mathematical Reserve (-)		23.178	4.218	118.745	3.829
3.1.2- Profit Share Reserve (Reserves for Life Insurance Policies Including		2.576	469	13.194	425
3.2- Reinsurer Share of Mathematical Reserves (+)		-	-	-	-
3.2.1- Reinsurance Share of Actuarial Mathematical Reserve (+)		-	-	-	-
3.2.2- Reinsurance Share of Profit Share Reserve (Reserves for Life		-	-	-	-
4- Changes in Other Technical Reserves (Net of Reinsurer Share and		20	-	-	-
5- Operating Expenses (-)	32	-	-	-	-
6- Investment Expenses (-)		-	-	-	-
7- Unrealized Losses from Investments (-)		-	-	-	-
8- Investment Income Transferred to Non- Technical Part (-)		-	-	-	-
F- Life Technical Profit (D-E)		(7.118)	(387)	(7.056)	206
G- Individual Retirement Technical Income					
1- Fund Management Fee		-	-	-	-
2- Management Fee Deduction		-	-	-	-
3- Initial Contribution Fee		-	-	-	-
4- Management Fee In Case Of Temporary Suspension		-	-	-	-
5- Withholding tax		-	-	-	-
6- Increase in Market Value of Capital Commitment Advances		-	-	-	-
7- Other Technical Income		-	-	-	-
H- Individual Retirement Technical Expense					
1- Fund Management Expenses (-)		-	-	-	-
2- Decrease in Market Value of Capital Commitment Advances (-)		-	-	-	-
3- Operating Expenses (-)		-	-	-	-
4- Other Technical Expense (-)		-	-	-	-
I- Individual Retirement Technical Profit (G-H)					

The accompanying notes form an integral part of these financial statements.

AKSIGORTA A.Ş.

CONVENIENCE TRANSLATION OF THE STATEMENT OF INCOME FOR THE PERIOD JANUARY 1 – SEPTEMBER 30, 2019

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

II-NON TECHNICAL PART	Note	Unreviewed	Unreviewed	Unaudited	Unaudited
		Current Period	Current Period	Current Period	Previous Period
		01/01/2019-	01/07/2019-	01/01/2018-30/09/2018	01/07/2018-30/09/2018
C- Non Life Technical Profit (A-B)		425.471.190	144.345.474	273.197.299	116.177.757
F- Life Technical Profit (D-E)		(7.118)	(387)	(7.056)	206
I- Individual Retirement Technical Profit (G-H)		-	-	-	-
J- Total Technical Profit (C+F+I)		425.464.072	144.345.087	273.190.243	116.177.963
K- Investment Income		488.214.186	161.385.112	464.129.861	261.480.550
1- Income From Financial Investment	26	103.086.892	40.229.134	93.799.132	24.557.359
2- Income from Sales of Financial Investments	26	45.261.105	16.850.688	46.497.987	14.081.152
3- Revaluation of Financial Investments	26	49.534.811	27.392.486	4.525.434	21.139.169
4- Foreign Exchange Gains	36	142.828.427	(10.053.174)	263.160.679	186.192.017
5- Income from Affiliates		-	-	-	-
6- Income from Subsidiaries and Joint Ventures		-	-	-	-
7- Income Received from Land and Building	26	-	-	-	-
8- Income from Derivatives	13	147.502.951	86.965.978	56.146.629	15.510.853
9- Other Investments		-	-	-	-
10- Investment Income transferred from Life Technical Part		-	-	-	-
L- Investment Expenses (-)		(518.875.737)	(172.204.125)	(479.233.918)	(266.402.442)
1- Investment Management Expenses (including interest) (-)		(6.277.013)	(2.113.769)	-	-
2- Valuation Allowance of Investments (-)		(372.992)	768.251	-	-
3- Losses On Sales of Investments (-)	26	(8.522.680)	(2.957.357)	(3.229.240)	(3.199.910)
4- Investment Income Transferred to Life Technical Part (-)		(356.368.586)	(115.050.502)	(227.405.128)	(110.161.772)
5- Losses from Derivatives (-)		-	-	-	-
6- Foreign Exchange Losses (-)	36	(122.949.928)	(44.145.568)	(233.494.413)	(148.087.431)
7- Depreciation Expenses (-)	5, 6 and 8	(24.384.538)	(8.705.180)	(15.105.137)	(4.953.329)
8- Other Investment Expenses (-)		-	-	-	-
M- Other Income and Expenses (+/-)	47	(55.319.518)	(22.044.577)	(32.503.418)	(10.518.164)
1- Provisions Account (+/-)	47	(16.489.832)	(13.700.464)	(39.275.688)	(19.436.039)
2- Discount account (+/-)	47	-	-	-	-
3- Mandatory Earthquake Insurance Account (+/-)	47	1.320.359	48.868	1.056.785	16.958
4- Inflation Adjustment Account (+/-)		-	-	-	-
5- Deferred Tax Asset Accounts(+/-)	35 and 47	(3.363.588)	(6.057.507)	11.000.863	10.686.719
6- Deferred Tax Expense Accounts (-)		-	-	-	-
7- Other Income and Revenues	47	1.256.058	346.007	943.337	308.014
8- Other Expense and Losses (-)	47	(38.042.515)	(2.681.481)	(6.228.715)	(2.093.816)
9- Prior Period Income	47	-	-	-	-
10- Prior Period Losses (-)		-	-	-	-
N- Net Profit / (Loss)	37	259.001.578	90.773.632	165.131.100	69.081.978
1- Profit/(Loss) Before Tax		339.483.003	111.481.497	225.582.768	100.737.907
2- Corporate Tax Liability Provision (-)	35	(80.481.425)	(20.707.865)	(60.451.668)	(31.655.929)
3- Net Profit (Loss)		259.001.578	90.773.632	165.131.100	69.081.978
4- Inflation Adjustment Account		-	-	-	-

The accompanying notes form an integral part of these financial statements.

AKSİGORTA A.Ş.

**CONVENIENCE TRANSLATION OF THE STATEMENT OF CHANGES IN SHAREHOLDERS' EQUITY
FOR THE PERIOD JANUARY 1 – SEPTEMBER 30, 2019**

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

CURRENT PERIOD	Capital	Equity Shares Owned by the Company (-)	Revaluation of Financial Assets	Inflation Adjustment on Capital	Translation Reserves	Legal Reserves	Statutory Reserves	Other Reserves and Retained Earnings	Net Profit/(Loss) for the Period	Previous Years' Profit/(Loss)	Total
I - Closing Balance of Prior Period (31/12/2018)	306.000.000	-	(10.638.677)	-	-	15.835.334	62	92.793.197	227.619.080	86.350.467	717.959.463
II - Amendments in Accounting Policy	-	-	-	-	-	-	-	-	-	-	-
III - Current Balance (I + II) (01/01/2019)	306.000.000	-	(10.638.677)	-	-	15.835.334	62	92.793.197	227.619.080	86.350.467	717.959.463
A- Capital increase (A1 + A2)	-	-	-	-	-	-	-	-	-	-	-
1- Cash	-	-	-	-	-	-	-	-	-	-	-
2- Internal sources	-	-	-	-	-	-	-	-	-	-	-
B- Equity shares purchased by the company	-	-	-	-	-	-	-	-	-	-	-
C- Income / (expense) recognized directly in the equity	-	-	-	-	-	-	-	-	-	-	-
D- Revaluation of financial assets (Note 16.1)	-	-	14.819.100	-	-	-	-	-	-	-	14.819.100
E- Translation reserves	-	-	-	-	-	-	-	-	-	-	-
F- Other income / (expenses)	-	-	-	-	-	-	-	(1.038.810)	-	-	(1.038.810)
G- Inflation adjustment differences	-	-	-	-	-	-	-	-	-	-	-
H- Period net profit (Note 37)	-	-	-	-	-	-	-	-	259.001.578	-	259.001.578
I- Dividend distributed	-	-	-	-	-	-	-	-	(197.572.126)	(4.387.874)	(201.960.000)
J- Transfer	-	-	-	-	-	30.046.954	-	(4.387.874)	(30.046.954)	4.387.874	-
II- Closing Balance (30/09/2018) (III+ A+B+C+D+E+F+G+H+I+J)	306.000.000	-	4.180.423	-	-	45.882.288	62	87.366.513	259.001.578	86.350.467	788.781.331

AKSİGORTA A.Ş.

**CONVENIENCE TRANSLATION OF THE STATEMENT OF INCOME
FOR THE PERIOD JANUARY 1 – SEPTEMBER 30, 2018**

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

	Capital	Equity Shares Owned by the Company (-)	Revaluation of Financial Assets	Inflation Adjustment on Capital	Translation Reserves	Legal Reserves	Statutory Reserves	Other Reserves and Retained Earnings	Net Profit/(Loss) for the Period	Previous Years' Profit/(Loss)	Total
CURRENT PERIOD											
I - Closing Balance of Prior Period (31/12/2017)	306.000.000	-	(14.470)	-	-	-	62	109.779.823	126.986.683	86.350.467	629.102.565
II - Amendments in Accounting Policy	-	-	-	-	-	-	-	-	-	-	-
III - Current Balance (I+ II) (01/01/2018)	306.000.000	-	(14.470)	-	-	-	62	109.779.823	126.986.683	86.350.467	629.102.565
A- Capital increase (A1 + A2)	-	-	-	-	-	-	-	-	-	-	-
1- Cash	-	-	-	-	-	-	-	-	-	-	-
2- Internal sources	-	-	-	-	-	-	-	-	-	-	-
B- Equity shares purchased by the company	-	-	-	-	-	-	-	-	-	-	-
C- Income / (expense) recognized directly in the equity	-	-	-	-	-	-	-	-	-	-	-
D- Revaluation of financial assets (Note 16.1)	-	-	(22.377.441)	-	-	-	-	-	-	-	(22.377.441)
E- Translation reserves	-	-	-	-	-	-	-	-	-	-	-
F- Other income / (expenses)	-	-	-	-	-	-	-	20.880.631	-	-	20.880.631
G- Inflation adjustment differences	-	-	-	-	-	-	-	-	-	-	-
H- Period net profit (Note 37)	-	-	-	-	-	-	-	-	165.131.100	-	165.131.100
I- Dividend distributed	-	-	-	-	-	-	-	-	(110.160.000)	-	(110.160.000)
J- Transfer	-	-	-	-	-	15.835.334	-	991.349	(16.826.683)	-	-
II- Closing Balance (30/09/2017) (III+ A+B+C+D+E+F+G+H+I+J)	306.000.000	-	(22.391.911)	-	-	15.835.334	62	131.651.803	165.131.100	86.350.467	682.576.855

The accompanying notes form an integral part of these financial st

AKSIGORTA A.Ş.

**CONVENIENCE TRANSLATION OF THE STATEMENT OF CHANGES IN SHAREHOLDERS' EQUITY
FOR THE PERIOD JANUARY 1 – SEPTEMBER 30, 2019**

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

AKSİGORTA A.Ş.
**CONVENIENCE TRANSLATION OF THE STATEMENTS OF CASH FLOW
FOR THE PERIOD JANUARY 1 – SEPTEMBER 30, 2019**

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

CASH FLOW STATEMENT			
	Note	Reviewed	Reviewed
		30/09/2019	30/09/2018
A. CASH FLOWS FROM THE OPERATING ACTIVITIES			
1. Cash inflows from the insurance operations		3.557.515.797	2.944.533.976
2. Cash inflows from the reinsurance operations		-	-
3. Cash inflows from the pension operations		-	-
4. Cash outflows due to the insurance operations (-)		(3.143.334.295)	(2.474.495.688)
5. Cash outflows due to the reinsurance operations (-)		-	-
6. Cash outflows due to the pension operations (-)		-	-
7. Cash generated from the operating activities (A1+A2+A3-A4-A5-A6)		414.181.502	470.038.288
8. Interest payments (-)		-	-
9. Income tax payments (-)		(63.680.629)	(38.342.397)
10. Other cash inflows		1.927.057	1.225.060
11. Other cash outflows (-)		(23.455.118)	(52.488.022)
12. Net cash generated from the operating activities		328.972.812	380.432.930
B. CASH FLOWS FROM THE INVESTING ACTIVITIES			
1. Sale of tangible assets		-	1.104.973
2. Purchase of tangible assets (-)	6	(18.229.076)	(11.669.799)
3. Acquisition of financial assets (-)		(184.603.469)	(86.787.523)
4. Sale of financial assets		(10.079.687)	128.312.824
5. Interest received		229.276.307	93.799.132
6. Dividends received		-	-
7. Other cash inflows		-	56.161.080
8. Other cash outflows (-)	8	-	-
9. Net cash generated from the investing activities		16.364.075	180.920.687
C. CASH FLOWS FROM THE FINANCING ACTIVITIES			
1. Issue of equity shares		-	-
2. Cash inflows from the loans to policyholders		-	-
3. Payments of financial leases (-)		-	-
4. Dividend paid (-)	38	(201.960.000)	(110.160.000)
5. Other cash inflows		-	-
6. Other cash outflows (-)		-	-
7. Cash generated from the financing activities		(205.051.071)	(110.160.000)
D. EFFECTS OF EXCHANGE RATE DIFFERENCES ON CASH AND CASH			
		19.878.499	56.126.944
E. Net increase/(decrease) in cash and cash equivalents (A12+B9+C7+D)		160.164.315	507.320.561
F. Cash and cash equivalents at the beginning of the period	14	1.763.461.138	1.200.503.027
G. Cash and cash equivalents at the end of the period (E+F)	14	1.923.625.453	1.707.823.588

The accompanying notes form an integral part of these financial statements.

**CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS
AS OF SEPTEMBER 30, 2019**

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

1. General Information

1.1 Name of the Parent Company and the ultimate owner

Aksigorta Anonim Şirketi (“the Company”) is a subsidiary of Hacı Ömer Sabancı Holding A.Ş. and Ageas Insurance International N.V. as of September 30, 2019. 38,02% (December 31, 2017: %38,02) of the Company is issued in Borsa İstanbul (“BİST”) (Note 2.14).

Agreement about the sale of %50 of 18.965.880.200 units of Aksigorta A.Ş. shares with TL 189.658.802 nominal value that belongs to H.Ö. Sabancı Holding (“Holding”) portfolio was signed with Ageas Insurance International N.V. at February 18, 2011. At the date of July 29, 2011, 9.482.940.100 units of Aksigorta A.Ş. shares that correspond to %50 of the Holding’s portfolio have been transferred to Ageas Insurance International N.V. with the sale price (excluding the corrections) of USD 220.029.000.

1.2 The Company’s address and legal structure and address of its registered country and registered office (or, if the Company’s address is different from its registered office, the original location where the Company’s actual operations are performed)

The Company is a corporation, which was established in accordance with the requirements of Turkish Commercial Code and registered in Turkey as at April 25, 1960. The headquarter of the Company is located at Meclis-i Mebusan Cad. No: 67 34427 Fındıklı / İstanbul, has moved to address ‘Poligon Cad. Buyaka 2 Site, No. 8, Kule 1, Kat: 0-6 34771 Ümraniye – İstanbul’ as of October 20, 2014.

1.3 Main operations of the Company

The Company’s main operations include insurance activities based on non-life insurance branches, including primarily fire, marine, accident, personal accident, engineering, agriculture and health. The headquarters of the Company is in İstanbul. The Company has also 10 sale district offices .

1.4 Details of the Company’s operations and nature of field of activities

Explained in Note 1.2 and Note 1.3.

1.5 Average number of the Company’s personnel based on their categories

	1 January - 30 September 2019	1 January - 31 December 2018
Top executive	9	8
Manager and assistant manager	118	104
Specialist/Executives	532	627
Total	659	739

AKSIGORTA A.Ş.

**CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS
AS OF SEPTEMBER 30, 2019**

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

**CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS
AS OF SEPTEMBER 30, 2019**

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

1. General Information (Continued)

1.6 Remuneration and fringe benefits provided to top management

Remuneration and fringe benefits provided to top management such as; chairman and members of the board of directors, managing director and assistant managing directors amount to TL 5.563.973 in total for the period January 1 – September 30, 2019 (July 1- September 30, 2019: TL 1.854.658) (January 1- September 30, 2018: TL 4.474.839, July 1- September 30, 2018: TL 1.550.869).

1.7 Distribution keys used in the distribution of investment income and operating expenses in the financial statements (personnel expenses, administration expenses, research and development expenses, marketing and selling expenses and other operating expenses)

Within the framework of the Undersecretariat for the Treasury of the Prime Minister’s Office of Republic of Turkey (“Undersecretariat for the Treasury”) Circular relating to Procedures and Principles for Keys used in Financial Statements prepared in the scope of Uniform Chart of Accounts for Insurance No. 2008/1, dated January 4, 2008, revenues generated by the Company through investment of assets that provide non-life technical provisions were transferred from the non-technical division to technical division. Other investment revenues were classified under the non-technical division. While distributing to sub-branches the operating expenses transferred to technical division, the last three-year weighted average of number of policies generated in the current period, the premium amount written as gross and number of claims were taken into account.

1.8 Stand-alone or consolidated financial statements

The accompanying financial statements comprise the stand-alone financial statements as of September 30, 2019.

1.9 Name and other information of the reporting company and subsequent changes to the prior balance sheet date

There has been no change in The Company’s name and other company information presented in Note 1.1, Note 1.2 and Note 1.3 as of the prior balance sheet date.

1.10 Subsequent Events

The Company’s financial statements as of September 30, 2018 are approved and authorized for issuance as of April 26, 2018 by the Board of Directors and signed by Chief Executive Officer Uğur Gülen, Chief Financial Officer Osman Akkoca, Accounting Manager Seza Tanınmış Özgür and Actuary Halil Kolbaşı. Detailed information about this subsequent events is disclosed in Note 46.

**CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS
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(Amounts expressed in Turkish Lira (“TL”) unless otherwise indicated.)

2. Summary of the Accounting Policies

2.1 Basis of Preparation

2.1.1 Basis of Preparation of Financial Statements and Specific Accounting Policies Used

Accounting Standards

In accordance with Article 50(a) of Section VII of the Capital Markets Law, insurance companies have to comply with their own specific laws and regulations in matters of establishment, auditing, supervision/oversight, accounting and financial reporting. Therefore, the Company’s financial statements are prepared in accordance with the prevailing accounting principles and standards for Insurance and Reinsurance Companies and Pension Funds set out by the by T.C. Prime Ministry Undersecretariat of the Treasury and applicable regulations required by the Insurance Law No: 5684 published in the Official Gazette No: 26522 on June 14, 2007.

The financial statements are prepared in accordance with the Insurance Chart of Accounts included in the communiqué issued by the Treasury regarding the Insurance Chart of Accounts and Prospects, published in the Official Gazette (No:25686) dated December 30, 2004 (Insurance Accounting System Communiqué No:1). Content and the format of the financial statements prepared and explanations and notes thereof are determined in accordance with the Communiqué on Presentation of Financial Statements published in the Official Gazette numbered 26851 dated June 18, 2008 and the Communiqué on the New Accounting Codes and Presentation of Financial Statements published in the Official Gazette dated May 31, 2012 and numbered 2012/7.

The Company accounts and recognizes its insurance technical provisions in its not consolidated financial statements as of December 31, 2016 in accordance with the “Regulation Regarding the Technical Reserves of Insurance, Reinsurance and Pension Companies and the Assets to which These Reserves Are Invested,” (“Regulation on Technical Reserves”) dated July 28, 2010 and published in official gazette numbered 27655 and published in Official Gazette dated July 17, 2012 numbered 28356 effective and the regulations issued for insurance and reinsurance companies by the Undersecretariat of Treasury (“Treasury”).

As of January 1, 2008, the Company accounts for its operations in accordance with the “Regulation on Financial Reporting of Insurance and Reinsurance Companies and Pension Companies” issued on July 14, 2007 and effective from January 1, 2008 within the framework of this regulation a, Turkish Accounting Standards (“TAS”) and Turkish Financial Reporting Standards (“TFRS”) issued by Turkish Accounting Standards Board (“TASB”) and other regulations, communiqués and explanations issued by Treasury on accounting and financial reporting. With reference to the notice of Treasury No. 9 dated February 18, 2008, “TAS 1- Financial Statements and Presentation”, “TAS 27- Consolidated and Non-consolidated Financial Statements”, “TFRS 1 - Transition to TFRS” and “TFRS 4- Insurance Contracts” were not included in the scope of this application for the year 2008. In addition, as of March 31, 2009, the companies are obliged to apply the Communiqué on the Preparation of the Consolidated Financial Statement of Insurance and Reinsurance Companies and Pension Companies” (“Consolidation Communiqué”) dated December 31, 2009 and published in the Official Gazette numbered 27097. According to the temporary Article 2 of the above mentioned Communiqué, associations except insurance, reinsurance and pension companies are out of scope until March 31, 2010.

**CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS
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(Amounts expressed in Turkish Lira (“TL”) unless otherwise indicated.)

2. Summary of the Accounting Policies (Continued)

2.1.1 Basis of Preparation of Financial Statements and Specific Accounting Policies Used (Continued)

The Public Oversight, Accounting and Auditing Standards Agency (POA), established in accordance with the Statutory Decree published in the Official Gazette dated November 2, 2011, among its other powers and duties, for the purpose of ensuring that the financial statements of those obliged to keep accounts in accordance with the laws they are subject to meet the needs, are transparent, reliable, comprehensible, comparable and consistent; is authorized to create and publish Turkish Accounting Standards (TASs) which are compliant with international standards; to make secondary regulations regarding the implementation of the Turkish Accounting Standards, to make necessary decisions and to grant approval on the regulations made by the institutions and organizations authorized to make regulations within their domain.

Pursuant to the Decree of the Assembly Regarding the Determination of the Scope of Implementation of Turkish Accounting Standards” dated January 13, 2011 and numbered 6102; institutions concerning public interest stated in the Public Service Commission numbered 660 shall be subject to independent audit within the framework of Article 397 of the Code 6102, based on the decree of Board of Directors and entities mentioned in Paragraph 2 of Article 1534 of the same Code shall apply TAS in the preparation of their separate and consolidated financial statements.

Entities established in order to execute at least one of the fields of activity projected in the Banking Law dated October 19, 2005 and numbered 5411, set an example to the financial statements to be prepared by companies obliged to apply TAS; except for development and investment banks and financial holding companies as well as financial institutions established to engage in insurance, individual retirement and capital market within the frame of the Capital Market Law dated December 6, 2012 and numbered 6362, Insurance Law dated June 3, 2007 and numbered 5684, Individual Saving and Investment System Law dated March 28, 2011 and numbered 4632 and regulations pertaining to their own clauses.

Financial Statements are prepared accordance with the prevailing accounting principles and standards as per the insurance legislation and Turkish Accounting Standards decree for the matters not regulated by insurance legislation; “Insurance Accounting and Financial Reporting Legislation”.

a. Preparation of Financial Statements in Hyperinflationary Periods

In accordance with the Undersecretariat of the Treasury’s statement no: 19387 issued on April 4, 2005, the Company’s financial statements as of December 31, 2004 are adjusted and its 2005 openings are prepared based on the requirements set out in “the preparation of financial statements in hyperinflationary periods” specified in the Capital Market Board’s (CMB) Decree Volume: XI, No: 25 “Accounting Standards in Capital Markets” which was published in the Official Gazette No: 25290 on November 15, 2003. In addition, the preparation of financial statements in hyperinflationary periods has not been applied in accordance with the statement of the Undersecretariat of the Treasury. Therefore, as of March 31, 2017, non-monetary balance sheet assets and liabilities and equity items, including capital share, are calculated by indexing of inputs as of December 31, 2004 (for inputs prior to December 31, 2004) and carrying inputs subsequent to December 31, 2004 at nominal value.

b. Comparative Information and Restatement of Prior Period Financial Statements

The Company’s balance sheet as of September 30, 2019 is presented in comparison with its balance sheet as of December 31, 2017; income statement, statement of changes in equity and cash flow statement for the interim period between January 1 – September 30, 2019 are presented in comparison with its income statement, statement of changes in equity and cash flow statement for the interim period between January 1 – September 30, 2018.

**CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS
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(Amounts expressed in Turkish Lira (“TL”) unless otherwise indicated.)

2. Summary of the Accounting Policies (Continued)

c. Technical Reserves

Unearned Premium Reserve

Unearned premium reserve is calculated on a daily basis for all policies in force as of balance sheet date for unearned portions of premiums written except for marine premiums. 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 finish at 12.00 noon again. Within the framework of the “Regulation Regarding the Technical Reserves of Insurance, Reinsurance and Pension Companies and the Assets to which These Reserves Are Invested,” (“Regulation on Technical Reserves”) issued in Official Gazette No: 26606 dated August 7, 2007, unearned premium reserve and the reinsurers’ share of the unearned premium reserve of the policies, are calculated as the unearned portion of the premiums and ceded premiums to reinsurers without deducting commissions or any other deductions, on an accrual and gross basis. For marine policies with an uncertain end date, unearned premium reserve is calculated as 50% of the premiums written in the last three months (Note 20).

Deferred commission expense and income

Within the framework of the Circular numbered 2007/25 and dated December 28, 2007 published by Treasury, the unearned portion of commissions paid to agencies for the written premiums and commissions received from reinsurers for the ceded premium, are recorded as in deferred expenses and deferred income, respectively on the balance sheet, and as operating expenses on a net basis in the income statement.

Unexpired Risks Reserve

Within the framework of Regulation on Technical Reserves, insurance companies are required to account for an unexpired risk reserve against the probability that, future losses incurred from in force policies may exceed the unearned premium reserve accounted for the related policies considering expected loss ratios. Expected loss ratio is calculated by dividing the current year incurred losses to current year earned premiums. If the loss ratio for a branch is higher than 95%, net unexpired risk reserve for that branch is calculated by multiplying the ratio in excess of 95% with net unearned premium reserve for the related branch; and gross unexpired risk reserve for that branch is calculated by multiplying the ratio in excess of 95% with gross unearned premium reserve for the related branch. The difference between gross and net amounts is considered as the reinsurance share.

**CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS
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(Amounts expressed in Turkish Lira (“TL”) unless otherwise indicated.)

2. Summary of the Accounting Policies (Continued)

**2.1.1 Basis of Preparation of Financial Statements and Specific Accounting Policies Used
(Continued)**

In accordance with the Undersecretariat of the Treasury’s announcement no: 2012/13, article of 7 in order to eliminate the misleading effect of changes in the claims provision calculation, the Company has recalculated the prior period claims provision with new method to calculate unexpired risk reserve. Turkish Treasury allows insurance companies with the circular 2016/37 to calculate their unexpired risks reserve on Motor Own Damage, Motor Third Party Liability (Compulsory and Facultative separately) and General Liability by considering only the last 4 accident quarters’ loss ratios. According to this new method, loss ratios exceeding 95% in 2016, 90% in 2017 and 85% in 2018 and later years, will be multiplied by unearned premiums reserve.

The company has calculated it’s Unexpired Risks Reserve in Compulsory Motor Third Party Liability and General Liability lines using the method in Circular 2016/37. As a result of this new method, there is no unexpired risk reserve in these line of businesses as of 30 September 2019. The Company has been calculated TL 16.148.425 in the General Liability Branch and TL, 726.944 in the Water Vehicle Branch, 191 TL air crafts liability, a net provision has been calculated TL 16.875.560 (as of 31 December 2018: 20.653.057 TL) (Note 20).

Bonuses and rebates reserve

The bonus provisions are the amount that has to be made provision if the Company commits to pay bonus to insured’s’ policies in force regardless of renewal of the related policies. According to Insurance Law Article No.16, if the Company decides to bonus or discount operations, the amount must be allocated for insured person or beneficiaries regarding to technical results of the current year.

The Company has calculated and accounted for gross bonuses and rebates reserve amounting to TL 2.929.792 and net TL 21.072 as of 30 September 2019 (as of 31 December 2018 company has calculated and accounted gross bonus and rebates reserve amounting to TL 62.162.575 and net TL 97.055) (Note 20).

Claims provision

The Company accounts for outstanding claims and indemnities for the claims and indemnity costs which have accrued and determined on account, but not actually paid in the previous fiscal periods or in the current fiscal period or if this amount could not be calculated, for the claims and indemnity costs which have emerged in expected amounts, but not reported.

The Company recognizes outstanding claims reserve for the claims which are accrued but not paid yet in the current period or previous periods and for claims incurred but not reported.

**CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS
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(Amounts expressed in Turkish Lira (“TL”) unless otherwise indicated.)

2. Summary of the Accounting Policies (Continued)

2.1.1 Basis of Preparation of Financial Statements and Specific Accounting Policies Used (Continued)

Claims provision (Continued)

In accordance with the “Regulation Regarding the Amendment of the Regulation Regarding Technical Reserves of Insurance, Reinsurance and Pension Companies and the Assets to which These Reserves Are Invested” published in the Official Gazette dated July 28, 2010 and numbered 27655 and the Circular on Claims Provision dated December 5, 2014 and numbered 2014/16, the Company’s Incurred But Not Reported (IBNR) claims provisions were calculated using the actuarial chain ladder methods (“ACLM”).

The Regulation on the amendment of the related Regulation, published in the Official Gazette dated July 5, 2012 and numbered 28356 has enforced the provision “Incurred but not reported claims are calculated using the actuarial chain ladder method, the content and implementation basis are determined by the Undersecretariat or other calculation methods to be determined by the Undersecretariat.

In accordance with the circular issued by Turkish Treasury dated December 5, 2014 and numbered 2014/16, as of January 1, 2015 selection of data to be used in the calculation in branch-basis, adjusting process, selection of most appropriate method to interfere with the development factors are performed by the Company’s actuary. IBNR calculation in non-life insurance in accordance with the same circular, chain ladder methods are Standard Chain, Claim/Premium, Cape Cod, Frequency/Severity, Munich Chain or Bornhuetter-Ferguson. The method’s using by the actuary are as follows:

Branch	30 September 2019 Applied Method	31 December 2018 Applied Method
Motor Crafts Liability	Frekans/Şiddet/Standart	Frekans/Şiddet/Standart
General Liability	Standart Zincir/Hasar Prim	Standart Zincir/Hasar Prim
Financial Losses	Standart Zincir	Standart Zincir
Legal Protection	Standart Zincir	Standart Zincir
Fire and Natural Disaster	Bornhuetter-Ferguson	Bornhuetter-Ferguson
Air Crafts Liability	Standart Zincir	Standart Zincir
Credit	Standart Zincir	Standart Zincir
Water Crafts	Standart Zincir	Standart Zincir
Air Crafts	Standart Zincir	Standart Zincir
Accident	Bornhuetter-Ferguson	Bornhuetter-Ferguson
Health	Standart Zincir	Standart Zincir
Suretyship	Standart Zincir	Standart Zincir
Transportation	Bornhuetter-Ferguson	Bornhuetter-Ferguson
General Losses	Bornhuetter-Ferguson	Bornhuetter-Ferguson
Motor Own Damage	Standart Zincir	Standart Zincir

CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS AS OF SEPTEMBER 30, 2019

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

2. Summary of the Accounting Policies (Continued)

2.1.1 Basis of Preparation of Financial Statements and Specific Accounting Policies Used (Continued)

In accordance with the circular of the Undersecretariat of Treasury “Circular on Explanations Related Calculation of Incurred But Not Reported Claims Provision (IBNR)” (the “Circular numbered 2011/23”), the companies may apply a discount at the related rate not to exceed 25% (15% for branches which have started operating recently and which do not have five-year data) over the outstanding files for their files in the lawsuit process in accordance with the accruals in the last five years retrospectively taking into consideration the conclusion date of lawsuits) by sub-branches, calculating a winning rate over the amounts of lawsuits filed against the company. Since the above-mentioned actuarial chain ladder method involve the mentioned lawsuit winning discount in calculations, the Company decided to terminate this practice as of 2015 in accordance with the opinion of the company actuary.

Branch	Applied Method	30 September 2019		31 December 2018	
		Gross Additional Reserve	Net Additional Reserve	Gross Additional Reserve	Net Additional Reserve
Motor Crafts Liability	Frequency/Severity/Standard	592.448.270	592.448.270	Frequency/Severity/Standard	469.201.269
General Liability	Standard Chain/Loss Ratio	121.570.590	34.734.397	Standard Chain/Loss Ratio	84.270.336
General Losses	Bornhuetter-Ferguson	1.323.709	219.687	Bornhuetter-Ferguson	12.530.010
Fire and Natural Disaster	Bornhuetter-Ferguson	6.221.200	(1.421.031)	Bornhuetter-Ferguson	8.977.040
Accident	Bornhuetter-Ferguson	1.363.915	794.742	Bornhuetter-Ferguson	467.249
Transportation	Standard Chain	2.316.990	108.242	Bornhuetter-Ferguson	847.566
Financial Losses	Bornhuetter-Ferguson	11.297.976	(23.298)	Standard Chain	879.982
Water Crafts	Standard Chain	535.894	212.968	Standard Chain	188.309
Health	Standard Chain	967.148	(33)	Standard Chain	638.476
Air Crafts Liability	Standard Chain	155.881	82	Standard Chain	420.236
Suretyship	Standard Chain	394.092	208.327	Standard Chain	318.456
Legal Protection	Standard Chain	105.807	105.807	Standard Chain	67.538
Air Crafts	Standard Chain	116.819	3	Standard Chain	83.183
Credit	Standard Chain	108.427	5.422	Standard Chain	667.542
Motor Own Damage	Standard Chain	(11.547.548)	(11.547.548)	Standard Chain	(15.663.332)
Total		727.379.169	615.846.036		563.893.860
					480.135.810

While the Company actuary determined the threshold values regarding the peak claims considered as significant claims using the Box-Plot method allowed by the Undersecretariat of Treasury only for the Mandatory Traffic branch in order to make calculations using a more homogeneous data set in determining the IBNR before the Circular 2014/16, the threshold values have been determined using the plot analysis starting from 2015. With this method the files, exceeds the determined limits considered as significant claims. The claim process of these files is different from other files. For these files, additional provision calculations were performed and added to the provisions. As of March 2018 limits, the total number of files that are subject to calculation, significant claims file number, significant claims file percentages are as follows;

Branch	30 September 2019				31 December 2018			
	Limit	Big Claim Files Number	Total Number of Files	Elimination (%)	Limit	Big Claim Files Number	Total Number of Files	Elimination (%)
General Liability	200.000	504	29.164	1,7%	200.000	379	26.469	1,43%
General Losses	999.999	70	173.231	0,0%	999.999	59	158.243	0,04%
Transportation	499.999	81	60.566	0,1%	499.999	62	57.321	0,11%
Fire and Natural Disaster	999.999	190	256.173	0,1%	999.999	156	232.606	0,07%
Accident	299.999	32	6.989	0,5%	299.999	27	6.571	0,41%
Facultative Public Liability	149.999	84	9.619	0,9%	149.999	57	8.063	0,71%
Financial Losses	50.000	47	34.380	0,1%	50.000	41	30.989	0,13%

**CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS
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2. Summary of the Accounting Policies (Continued)**2.1.1 Basis of Preparation of Financial Statements and Specific Accounting Policies Used
(Continued)**

In branches where significant claim determination is performed, additional provision calculations were performed for these files added to the Outstanding Claims Provisions. Additional gross amounts, as the branches are as follows.

Branch	Gross Additional Amount	Net IBNR
Fire and Natural Disaster	9.277.451	639.052
General Liability	30.957.292	5.560.346
Facultative Public Liability	2.192.505	2.192.505
Financial Losses	11.667.646	346.521
Transportation	3.061.327	515.574
Accident	324.994	29.743

The circular numbered 2015/7 published by the Undersecretariat of Treasury has made it possible to recognize gradually the increases to occur in the IBNR amount to be calculated as of January 1, 2015 in accordance with the circular numbered 2014/6 when compared to the IBNR amount calculated as of prior year as of quarterly periods from 2015 to 2017. In compliance with the circular, the company has not used gradual transition rate for the 1st quarter of 2017 in the Compulsory Traffic and General Liability branches.

In accordance with the circular, IBNR was calculated by the company actuary in gross amount based on the Accident Periods using the above-mentioned methods. For these gross IBNR amounts, reinsurer shares were calculated taking into consideration the reinsurance rates and the effective reinsurance agreement types (clean-cut or run-off) in the related accident periods in related branches.

Equalization Reserve

In accordance with the Regulation on Technical Reserves, insurance companies are required to record an equalization reserve for the insurance contracts including earthquake and credit coverage, in order to cover the catastrophic risks and in order to equalize the fluctuations within the claim ratios that may occur during the following accounting periods. Such reserve is calculated over 12% of net earthquake and credit premiums corresponding to each year. In the calculation of the net premium, the amounts paid for the non-proportional reinsurance agreements are regarded as ceded premiums.

It is possible to deduct the equalization reserve for earthquake compensations from equalization reserve for outstanding compensation reserve, but not current year’s equalization reserve, upon supplying evidence such as compensation payments for the earthquake, expert reports or the documentation that can be gathered from official institutions. In this extent, the Company has not deducted any claim amount from equalization reserve.

The Company has calculated TL 91.283.360 (December 31, 2018: TL 82.348.570) of equalization reserve as of September 30, 2019 (Note 20).

**CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS
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(Amounts expressed in Turkish Lira (“TL”) unless otherwise indicated.)

2. Summary of the Accounting Policies (Continued)

2.1.1 Basis of Preparation of Financial Statements and Specific Accounting Policies Used (Continued)

Life mathematical reserves

Life mathematical reserves comprise actuarial mathematical reserves and life profit share reserves and represent the Company’s total liability to the policyholders in the life branch.

Mathematical Reserves has been calculated with the tariffs approved by the Treasury in the current period of the policies and applicable methods and assumptions specified in the profit share technical principles (Note 20).

d. Subrogation and salvage income

Within the framework of the Undersecretariat for the Treasury of the Prime Minister’s Office of Republic of Turkey (“Undersecretariat for the Treasury”) Circular relating to Subrogation and salvage income No. 2015/6, dated February 10, 2015; as of December 31, 2017, the Company recognizes receivables from salvage and subrogation on an accrual basis up to coverage limit of debtor insurance company, on conditions that following the payment of claim, the Company receives the acquaintance or document agreed on payment from individuals and notification is made to individuals or insurance company. However, a doubtful receivables provision for these receivables is accounted under “Provisions for Doubtful Receivables From Main Operations” in case where related amounts are not collected from insurance companies after six months and from individuals after four months following the payment of claim

Accordingly, accrued receivables from salvage and subrogation and doubtful receivables provision for salvage and subrogation as of September 30, 2019 are TL 26.704.226 (December 31, 2018: TL 29.909.283) and 21.364.922 (December 31, 2018: TL 8.061.143) respectively (Note 12.1).

The amounts of the net salvage and subrogation income which are collected and the accrued income amounts from salvage and subrogation receivables for the claims paid by the Company are as follows:

	30 September 2019					
	Collection			Accrual		
	Gross	Reinsurance share	Net	Gross	Reinsurance share	Net
Motor Own Damage	160.308.473	-	160.308.473	20.561.959	-	20.561.959
Motor Crafts Liability	6.429.997	(297.022)	6.132.975	5.518.627	(422.442)	5.096.185
Fire and Natural Disaster	3.475.422	(1.994.816)	1.480.606	1.730.073	(788.229)	941.844
Transportation	3.350.482	(1.379.950)	1.970.532	135.839	(70.366)	65.473
General Losses	112.195	(68.630)	43.565	119.618	(108.497)	11.121
Suretyship	8.551	(4.572)	3.979	-	-	-
Legal Protection	934	-	934	-	-	-
General Liability	56.623	(33.893)	22.730	8.187	(5.731)	2.456
Water Crafts	34.502	(24.152)	10.350	33.584	(8.396)	25.188
Accident	-	-	-	-	-	-
Health	-	-	-	-	-	-
Credit	-	-	-	-	-	-
Financial Losses	-	-	-	-	-	-
Total	173.777.179	(3.803.035)	169.974.144	28.107.887	(1.403.661)	26.704.226

**CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS
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3. Summary of the Accounting Policies (Continued)

	31 December 2018					
	Collection			Accrual		
	Gross	Reinsurance share	Net	Gross	Reinsurance share	Net
Motor Own Damage	209.470.121	-	209.470.121	24.876.295	-	24.876.295
Motor Crafts Liability	6.314.630	(294.645)	6.019.985	4.246.439	(507.324)	3.739.115
Fire and Natural Disaster	4.342.443	(2.317.410)	2.025.033	1.062.428	(186.425)	876.003
Transportation	2.429.948	(677.614)	1.752.334	347.783	(35.845)	311.938
General Liability	57.476	(13.357)	44.119	115.551	(79.713)	35.838
General Losses	539.228	(240.590)	298.638	239.492	(183.528)	55.964
Water Crafts	16.945	(4.986)	11.959	-	-	-
Suretyship	137.216	(93.443)	43.773	14.130	-	14.130
Accident	36.000	-	36.000	-	-	-
Legal Protection	12.886	-	12.886	-	-	-
Financial Losses	-	-	-	-	-	-
Health	-	-	-	-	-	-
Total	223.356.893	(3.642.045)	219.714.848	30.902.118	(992.835)	29.909.283

2.1.1 Basis of Preparation of Financial Statements and Specific Accounting Policies Used (Continued)

e. Premium Income and Claims

Premium income represents premiums on policies written during the year. Unearned premium reserves are determined from premiums written during the year on a daily basis.

Claims are recognized as expense as they are paid. Outstanding claims provision is provided for both reported unpaid claims at period-end and incurred but not reported claims. Reinsurer's shares of claims paid and outstanding loss provisions are off-set against these reserves.

f. Receivables from Insurance Operations

In accordance with the Turkish Tax Code article No: 323, the Company provided provision for doubtful receivables by taking the nature and the value of the receivable into account. As of September 30, 2019, the Company has provided provision for the doubtful receivables under legal and management follow up in the account of "Provision for doubtful receivables from insurance operations" amounting to TL 23.671.502. (December 31, Aralık 2018: 23.016.557 TL), provision for the overdue receivables which are not under legal follow up in the account of "Provision for doubtful receivables from main operations" amounting to TL 29.459.724 TL (31 Aralık 2018: 11.935.533 TL). Furthermore, provision is accounted for the retention of claim recovery transactions under legal follow up amounting to TL 89.692.805 (December 31, 2018: TL 83.717.544 7 and it has been accounted in "Provision for doubtful receivables from main operations" account (Note 12).

g. Earnings per Share

Earnings per share presented in the statement of income is calculated by dividing the net profit into the weighted average number of the outstanding shares throughout the financial year.

Companies in Turkey can increase their capital by distributing "bonus shares" to shareholders from the prior periods' profit. Such "bonus share" distributions are considered as issued shares in the earnings per share calculations. Accordingly, weighted average number of equity shares used in the calculations is calculated by considering the retrospective effects of share distributions.

h. Subsequent Events

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**CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS
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(Amounts expressed in Turkish Lira (“TL”) unless otherwise indicated.)

Subsequent events cover the events between the balance sheet date and the issuance of the financial statements, even if they are occurred subsequent to the disclosures made on profit or other selected financial information.

The Company adjusts its financial statements in the occurrence of any subsequent events (Note 46).

**CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS
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(Amounts expressed in Turkish Lira (“TL”) unless otherwise indicated.)

2. Summary of the Accounting Policies (Continued)

2.1.1 Basis of Preparation of Financial Statements and Specific Accounting Policies Used (Continued)

i. Provisions, Contingent Liabilities and Assets

Provisions are recognized when the Company has a present obligation as a result of a past event, and it is probable that the Company will be required to settle that obligation, and a reliable estimate can be made of the amount of the obligation.

The amount recognized as provision is the best estimate of the consideration required to settle the present obligation at the balance sheet date, taking into account the risks and uncertainties surrounding the obligation.

If provision is measured using the cash flows estimated to settle the present obligation, its carrying amount will be equal to the present value of such cash flows.

When some or all of the economic benefits required to settle a provision are expected to be recovered from a third party, the receivable is recognized as an asset if it is virtually certain that reimbursement will be received and the amount of the receivable can be measured reliably (Note 23.2).

j. Changes in Accounting Policies, Accounting Estimates and Errors

Changes in accounting policies or accounting errors are applied retrospectively and prior year financial statements are adjusted accordingly. If estimated changes in accounting policies are only for one period, changes are applied on the current year but if estimated changes are for the following periods, changes are applied both on the current and following years prospectively.

k. Corporate Taxation and Deferred Tax

Income tax expense represents the sum of the current tax payable and deferred tax expense.

**CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS
AS OF SEPTEMBER 30, 2019**

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

2. Summary of the Accounting Policies (Continued)

2.1.1 Basis of Preparation of Financial Statements and Specific Accounting Policies Used (Continued)

Corporate Tax

Corporation tax is payable at a rate of 22% on the total income of the Company and its Subsidiaries registered in Turkey in 2019 (2018: 22%) after adjusting for certain disallowable expenses, exempt income and investment and other allowances. No further tax is payable unless the profit is distributed.

Dividends paid to non-resident corporations, which have a place of business in Turkey, or resident corporations are not subject to withholding tax. Otherwise, dividends paid are subject to withholding tax at the rate of 15%. An increase in capital via issuing bonus shares is not considered as a profit distribution thus does not incur withholding tax and no stoppage is applied.

Corporations are required to pay advance corporation tax quarterly at the rate of 22% on their corporate income. Advance Tax is declared by 14th of the second month following and payable by the 17th of the second month following each calendar quarter end. Advance Tax paid by corporations is credited against the annual Corporation Tax liability.

The balance of the advance tax paid may be refunded or used to set off against other liabilities to the government.

The affiliate shares stocked for minimum 2 years and the 50% of the profit obtained from the property sales are considered as tax exemptions in such condition that the amount is added onto capital as prestated in Corporate Tax Law or the amount is kept in equity for 5 years.

According to Turkish tax legislation, financial losses on the returns can be offset against period income for up to 5 years. However, financial losses can not be offset against previous years' profits.

There is no such application for the reconciliation of payable taxes with the tax authority. Corporate tax returns are submitted to the related tax office by the 25th day of the 4th month following the month when the accounting period ends.

In tax reviews authorized bodies can review the accounting records for the past five years and if errors are detected, tax amounts may change due to tax assessment.

In accordance with Tax Law No.5024 “Law Related to Changes in Tax Procedural Law, Income Tax Law and Corporate Tax Law” published in the Official Gazette on December 30, 2003 to amend the tax base for non-monetary assets and liabilities, effective from 1 January 2004 income and corporate taxpayers are required to prepare the statutory financial statements by adjusting the non-monetary assets and liabilities for the changes in the general purchasing power of the Turkish Lira. In accordance with the Law in question, the cumulative inflation rate for the last 36 months and the inflation rate for the last 12 months must exceed 100% and 10% respectively (Wholesale Price Index increase rate). Since these conditions in question were not fulfilled in 2018 and 2017, no inflation adjustments were performed (Note 35).

**CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS
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(Amounts expressed in Turkish Lira (“TL”) unless otherwise indicated.)

2. Summary of the Accounting Policies (Continued)

2.1.1 Basis of Preparation of Financial Statements and Specific Accounting Policies Used (Continued)

Deferred income tax

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 financial statements. Deferred income tax assets and liabilities are determined using tax rates and tax laws that have been enacted or substantively enacted by the balance sheet date and are expected to apply when the related deferred income tax asset is realized or the deferred income tax liability is settled.

Except the conditions that the Company can control its temporary differences removal and when the possibility of that removal is very low, deferred tax liabilities are accounted for all of the taxable temporary differences that are related with the rates in partnerships and investments in subsidiaries and participations. Deferred income tax assets are recognized to the extent that it is probable that future taxable profit will be available against which the temporary differences can be utilized.

As of September 30, 2019, the Company has booked the deferred tax assets in amounting to TL 2.874.378 (December 31, 2018: TL : 16.972.963) is calculated over the statutory tax losses carried forward. The Company management is in the opinion that the Company is able to make sufficient taxable income based on the business plans and projections therefore the Company foresees no indicator of any concern regarding its recoverability of deferred tax assets.

Withholding Tax

In addition to corporate taxes, companies should also calculate income withholding taxes and funds surcharge on any dividends distributed, except for companies receiving dividends who are resident companies in Turkey and Turkish branches of foreign companies. The rate of income withholding tax is 10% starting from April 24, 2003 by the end of July 22, 2006. However, this rate was changed to 15% commencing from 22 July 2006 upon the order no: 2006/10731 of the Council of Ministers. Undistributed dividends incorporated in share capital are not subject to income withholding taxes.

Until the Council of Ministers has changed the rate, 10% will be applied. Undistributed dividends added to share capital are not subject to income tax withholding.

**CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS
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(Amounts expressed in Turkish Lira (“TL”) unless otherwise indicated.)

2. Summary of the Accounting Policies (Continued)

2.1.2 Other related accounting policies for the understanding of financial statements

All accounting policies are explained in Note 2.1.1 “Basis of Preparation of Financial Statements and Specific Accounting Policies Used”.

2.1.3 Functional currency

The Company’s financial statements are expressed in TL, which is the functional and presentation currency of the Company

2.1.4 Rounding degree used in the financial statements

All the balances presented in the financial statements are expressed in full in Turkish Lira (TL).

2.1.5 Valuation method(s) used in the presentation of financial statements

Financial statements, except for revaluation of financial instruments, are prepared based on the historical cost method.

2.1.6 The new standards, amendments and interpretations

The new standards, amendments and interpretations

The accounting policies adopted in preparation of the financial statements as at December 31, 2016 are consistent with those of the previous financial year, except for the adoption of new and amended TFRS and TFRIC interpretations effective as of January 1, 2016. The effects of these standards and interpretations on the Company’s financial position and performance have been disclosed in the related paragraphs.

i) The new standards, amendments and interpretations which are effective as at January 1, 2016 are as follows:

TFRS 11 Acquisition of an Interest in a Joint Operation (Amendment)

TFRS 11 is amended to provide guidance on the accounting for acquisitions of interests in joint operations in which the activity constitutes a business. This amendment requires the acquirer of an interest in a joint operation in which the activity constitutes a business, as defined in TFRS 3 Business Combinations, to apply all of the principles on business combinations accounting in TFRS 3 and other TFRSs except for those principles that conflict with the guidance in this TFRS. In addition, the acquirer shall disclose the information required by TFRS 3 and other TFRSs for business combinations. The amendments did not have an impact on the financial position or performance of the Company.

**CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS
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(Amounts expressed in Turkish Lira (“TL”) unless otherwise indicated.)

2. Summary of the Accounting Policies (Continued)

2.1.6 The new standards, amendments and interpretations (Continued)

**TAS 16 and TAS 38 - Clarification of Acceptable Methods of Depreciation and Amortisation
(Amendments to TAS 16 and TAS 38)**

The amendments to TAS 16 and TAS 38, have prohibited the use of revenue-based depreciation for property, plant and equipment and significantly limiting the use of revenue-based amortisation for intangible assets. The amendments did not have an impact on the financial position or performance of the Company.

TAS 16 Property, Plant and Equipment and TAS 41 Agriculture (Amendment) – Bearer Plants

TAS 16 is amended to provide guidance that bearer plants, such as grape vines, rubber trees and oil palms should be accounted for in the same way as property, plant and equipment in TAS 16. Once a bearer plant is mature, apart from bearing produce, its biological transformation is no longer significant in generating future economic benefits. The only significant future economic benefits it generates come from the agricultural produce that it creates. Because their operation is similar to that of manufacturing, either the cost model or revaluation model should be applied. The produce growing on bearer plants will remain within the scope of TAS 41, measured at fair value less costs to sell. The amendment is not applicable for the Company and did not have an impact on the financial position or performance of the Company.

TAS 27 Equity Method in Separate Financial Statements (Amendments to TAS 27)

Public Oversight Accounting and Auditing Standards Authority (POA) of Turkey issued an amendment to TAS 27 to restore the option to use the equity method to account for investments in subsidiaries and associates in an entity’s separate financial statements. Therefore, an entity must account for these investments either:

- At cost
 - In accordance with IFRS 9,
- Or
- Using the equity method defined in TAS 28

TFRS 10 and TAS 28: Sale or Contribution of Assets between an Investor and its Associate or Joint Venture (Amendments)

Amendments issued to TFRS 10 and TAS 28, to address the acknowledged inconsistency between the requirements in TFRS 10 and TAS 28 in dealing with the loss of control of a subsidiary that is contributed to an associate or a joint venture, to clarify that an investor recognises a full gain or loss on the sale or contribution of assets that constitute a business, as defined in TFRS 3, between an investor and its associate or joint venture. The gain or loss resulting from the re-measurement at fair value of an investment retained in a former subsidiary should be recognised only to the extent of unrelated investors’ interests in that former subsidiary. The amendment is not applicable for the Company and did not have an impact on the financial position or performance of the Company.

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

2. Summary of the Accounting Policies (Continued)

2.1.6 The new standards, amendments and interpretations (Continue)

**TFRS 10, TFRS 12 and TAS 28: Investment Entities: Applying the Consolidation Exception
(Amendments to IFRS 10 and IAS 28)**

Amendments issued to TFRS 10, TFRS 12 and TAS 28, to address the issues that have arisen in applying the investment entities exception under TFRS 10 Consolidated Financial Statements. The amendment is not applicable for the Company and did not have an impact on the financial position or performance of the Company.

TAS 1: Disclosure Initiative (Amendments to TAS 1)

The amendments issued to TAS 1. Those amendments include narrow-focus improvements in the following five areas: Materiality, Disaggregation and subtotals, Notes structure, Disclosure of accounting policies, Presentation of items of other comprehensive income (OCI) arising from equity accounted investments. These amendments did not have significant impact on the notes to the financial statements of the Company.

Annual Improvements to TFRSs - 2012-2014 Cycle

POA issued, Annual Improvements to TFRSs 2012-2014 Cycle. The document sets out five amendments to four standards, excluding those standards that are consequentially amended, and the related Basis for Conclusions. The standards affected and the subjects of the amendments are:

- IFRS 5 Non-current Assets Held for Sale and Discontinued Operations – clarifies that changes in methods of disposal (through sale or distribution to owners) would not be considered a new plan of disposal, rather it is a continuation of the original plan
- IFRS 7 Financial Instruments: Disclosures – clarifies that i) the assessment of servicing contracts that includes a fee for the continuing involvement of financial assets in accordance with IFRS 7; ii) the offsetting disclosure requirements do not apply to condensed interim financial statements, unless such disclosures provide a significant update to the information reported in the most recent annual report
- IAS 19 Employee Benefits – clarifies that market depth of high quality corporate bonds is assessed based on the currency in which the obligation is denominated, rather than the country where the obligation is located
- IAS 34 Interim Financial Reporting –clarifies that the required interim disclosures must either be in the interim financial statements or incorporated by cross-reference between the interim financial statements and wherever they are included within the interim financial report

The amendment did not have significant impact on the financial position or performance of the Company.

ii) Standards issued but not yet effective and not early adopted

Standards, interpretations and amendments to existing standards that are issued but not yet effective up to the date of issuance of the financial statements are as follows. The Company will make the necessary changes if not indicated otherwise, which will be affecting the financial statements and disclosures, when the new standards and interpretations become effective.

**CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS
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(Amounts expressed in Turkish Lira (“TL”) unless otherwise indicated.)

2. Summary of the Accounting Policies (Continued)

2.1.6 The new standards, amendments and interpretations (Continue)

IFRS 15 Revenue from Contracts with Customers

In September 2016, POA issued IFRS 15 Revenue from Contracts with Customers. The new standard issued includes the clarifying amendments to IFRS 15 made by IASB in April 2016. The new five-step model in the standard provides the recognition and measurement requirements of revenue. The standard applies to revenue from contracts with customers and provides a model for the sale of some non-financial assets that are not an output of the entity’s ordinary activities (e.g., the sale of property, plant and equipment or intangibles). IFRS 15 effective date is January 1, 2018, with early adoption permitted. Entities will transition to the new standard following either a full retrospective approach or a modified retrospective approach. The modified retrospective approach would allow the standard to be applied beginning with the current period, with no restatement of the comparative periods, but additional disclosures are required. The Company is in the process of assessing the impact of the standard on financial position or performance of the Company.

IFRS 9 Financial Instruments

In January 2017, POA issued the final version of IFRS 9 Financial Instruments. The final version of IFRS 9 brings together all three aspects of the accounting for financial instruments project: classification and measurement, impairment and hedge accounting. IFRS 9 is built on a logical, single classification and measurement approach for financial assets that reflects the business model in which they are managed and their cash flow characteristics. Built upon this is a forward-looking expected credit loss model that will result in more timely recognition of loan losses and is a single model that is applicable to all financial instruments subject to impairment accounting. In addition, IFRS 9 addresses the so-called ‘own credit’ issue, whereby banks and others book gains through profit or loss as a result of the value of their own debt falling due to a decrease in credit worthiness when they have elected to measure that debt at fair value. The Standard also includes an improved hedge accounting model to better link the economics of risk management with its accounting treatment. IFRS 9 is effective for annual periods beginning on or after 1 January 2018, with early application permitted by applying all requirements of the standard. Alternatively, entities may elect to early apply only the requirements for the presentation of gains and losses on financial liabilities designated as FVTPL without applying the other requirements in the standard. The Company is in the process of assessing the impact of the standard on financial position or performance of the Company.

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2. Summary of the Accounting Policies (Continued)

2.1.6 The new standards, amendments and interpretations (Continue)

iii) The new standards, amendments and interpretations that are issued by the International Accounting Standards Board (IASB) but not issued by Public Oversight Authority (POA)

The following standards, interpretations and amendments to existing IFRS standards are issued by the IASB but not yet effective up to the date of issuance of the financial statements. However, these standards, interpretations and amendments to existing IFRS standards are not yet adapted/issued by the POA, thus they do not constitute part of TFRS. The Company will make the necessary changes to its financial statements after the new standards and interpretations are issued and become effective under TFRS.

IFRS 10 and IAS 28: Sale or Contribution of Assets between an Investor and its Associate or Joint Venture (Amendments)

In December 2015, the IASB postponed the effective date of this amendment indefinitely pending the outcome of its research project on the equity method of accounting. Early application of the amendments is still permitted.

Annual Improvements – 2010–2012 Cycle

IFRS 13 Fair Value Measurement

As clarified in the Basis for Conclusions short-term receivables and payables with no stated interest rates can be held at invoice amounts when the effect of discounting is immaterial. The amendment is effective immediately.

IFRS 16 Leases

The IASB has published a new standard, IFRS 16 'Leases'. The new standard brings most leases on-balance sheet for lessees under a single model, eliminating the distinction between operating and finance leases. Lessor accounting however remains largely unchanged and the distinction between operating and finance leases is retained. IFRS 16 supersedes IAS 17 'Leases' and related interpretations and is effective for periods beginning on or after January 1, 2019, with earlier adoption permitted if IFRS 15 'Revenue from Contracts with Customers' has also been applied. The Company is in the process of assessing the impact of the standard on financial position or performance of the Company.

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2. Summary of the Accounting Policies (Continued)

2.1.6 The new standards, amendments and interpretations (Continue)

IAS 12 Income Taxes: Recognition of Deferred Tax Assets for Unrealised Losses (Amendments)

The IASB issued amendments to IAS 12 Income Taxes. The amendments clarify how to account for deferred tax assets related to debt instruments measured at fair value. The amendments clarify the requirements on recognition of deferred tax assets for unrealised losses, to address diversity in practice. These amendments are to be retrospectively applied for annual periods beginning on or after January 1, 2017 with earlier application permitted. However, on initial application of the amendment, the change in the opening equity of the earliest comparative period may be recognised in opening retained earnings (or in another component of equity, as appropriate), without allocating the change between opening retained earnings and other components of equity. If the Company/Group applies this relief, it shall disclose that fact. The Company is in the process of assessing the impact of the amendments on financial position or performance of the Company.

IAS 7 Statement of Cash Flows (Amendments)

The IASB issued amendments to IAS 7 'Statement of Cash Flows'. The amendments are intended to clarify IAS 7 to improve information provided to users of financial statements about an entity's financing activities. The improvements to disclosures require companies to provide information about changes in their financing liabilities. These amendments are to be applied for annual periods beginning on or after January 1, 2017 with earlier application permitted. When the Company/Group first applies those amendments, it is not required to provide comparative information for preceding periods. The Company is in the process of assessing the impact of the amendments on financial position or performance of the Company.

IFRS 2 Classification and Measurement of Share-based Payment Transactions (Amendments)

The IASB issued amendments to IFRS 2 Share-based Payment, clarifying how to account for certain types of share-based payment transactions. The amendments, provide requirements on the accounting for:

- a. the effects of vesting and non-vesting conditions on the measurement of cash-settled share-based payments;
- b. share-based payment transactions with a net settlement feature for withholding tax obligations; and
- c. a modification to the terms and conditions of a share-based payment that changes the classification of the transaction from cash-settled to equity-settled.

These amendments are to be applied for annual periods beginning on or after 1 January 2018. Earlier application is permitted. The amendment are not applicable for the Company and will not have an impact on the financial position or performance of the Company.

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2. Summary of the Accounting Policies (Continued)

2.1.6 The new standards, amendments and interpretations (Continued)

IFRS 4 Insurance Contracts (Amendments)

In September 2016, the IASB issued amendments to IFRS 4 Insurance Contracts. The amendments introduce two approaches: an overlay approach and a deferral approach. The amended Standard will:

- a) give all companies that issue insurance contracts the option to recognise in other comprehensive income, rather than profit or loss, the volatility that could arise when IFRS 9 Financial instruments is applied before the new insurance contracts Standard is issued; and
- b) give companies whose activities are predominantly connected with insurance an optional temporary exemption from applying IFRS 9 Financial Instruments until 2021. The entities that defer the application of IFRS 9 Financial instruments will continue to apply the existing Financial Instruments Standard IAS 39.

These amendments are to be applied for annual periods beginning on or after 1 January 2018. Earlier application is permitted. The Company is in the process of assessing the impact of the amendments on financial position or performance of the Company.

IAS 40 Investment Property: Transfers of Investment Property (Amendments)

The IASB issued amendments to IAS 40 'Investment Property'. The amendments state that a change in use occurs when the property meets, or ceases to meet, the definition of investment property and there is evidence of the change in use. These amendments are to be applied for annual periods beginning on or after 1 January 2018. Earlier application is permitted. The amendment are not applicable for the Company and will not have an impact on the financial position or performance of the Company.

IFRIC 22 Foreign Currency Transactions and Advance Consideration

The interpretation clarifies the accounting for transactions that include the receipt or payment of advance consideration in a foreign currency.

The Interpretation states that the date of the transaction for the purpose of determining the exchange rate to use on initial recognition of the related asset, expense or income is the date on which an entity initially recognises the non-monetary asset or non-monetary liability arising from the payment or receipt of advance consideration. An entity is not required to apply this Interpretation to income taxes; or insurance contracts (including reinsurance contracts) it issues or reinsurance contracts that it holds.

The interpretation is effective for annual reporting periods beginning on or after 1 January 2018. Earlier application is permitted. The interpretation is not applicable for the Company and will not have an impact on the financial position or performance of the Company.

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2. Summary of the Accounting Policies (Continued)

2.1.6 The new standards, amendments and interpretations (Continued)

Annual Improvements to IFRSs - 2014-2016 Cycle

The IASB issued Annual Improvements to IFRS Standards 2014–2016 Cycle, amending the following standards:

- IFRS 1 First-time Adoption of International Financial Reporting Standards: This amendment deletes the short-term exemptions about some IFRS 7 disclosures, IAS 19 transition provisions and IFRS 10 Investment Entities. These amendments are to be applied for annual periods beginning on or after 1 January 2018.
- IFRS 12 Disclosure of Interests in Other Entities: This amendment clarifies that an entity is not required to disclose summarised financial information for interests in subsidiaries, associates or joint ventures that is classified, or included in a disposal group that is classified, as held for sale in accordance with IFRS 5 Non-current Assets Held for Sale and Discontinued Operations. These amendments are to be applied for annual periods beginning on or after 1 January 2017.
- IAS 28 Investments in Associates and Joint Ventures: This amendment clarifies that the election to measure an investment in an associate or a joint venture held by, or indirectly through, a venture capital organisation or other qualifying entity at fair value through profit or loss applying IFRS 9 Financial Instruments is available for each associate or joint venture, at the initial recognition of the associate or joint venture. These amendments are to be applied for annual periods beginning on or after 1 January 2018. Earlier application is permitted.

The amendments are not applicable for the Company and will not have an impact on the financial position or performance of the Company.

2.2 Consolidation

The Company has no subsidiaries or joint ventures that fall within the scope of consolidation as per "IFRS 10– Consolidated and Separate Financial Statements" as of September 30, 2018 (December 31, 2017: None).

2.3 Segment Reporting

Reporting segments are determined to conform to the reporting made to the Company'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 5.

**CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS
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2. Summary of the Accounting Policies (Continued)

2.4 Discontinued Operations

The Company does not have any discontinued or disposed operations as of September 30, 2018 and December 31, 2017.

2.5 Foreign Currency Translation

The Company’s functional currency is Turkish Lira (“TL”). In preparing the financial statements of the Company, transactions in currencies other than TL (foreign currencies) are recognized at exchange rates prevailing at the transaction date. At each balance sheet date, monetary items denominated in foreign currencies are retranslated to Turkish Lira at the rates prevailing on the balance sheet date.

Non-monetary items carried at fair value that are denominated in foreign currencies are retranslated to Turkish Lira at the rates prevailing on the date when the fair value was determined. Non-monetary items that are measured in terms of historical cost in a foreign currency are not retranslated.

Changes in the fair value of monetary securities denominated in foreign currency classified as available for sale are analyzed between translation differences resulting from changes in the amortized cost of the security and other changes in the carrying amount of the security. Translation differences related to changes in amortized cost are recognized in profit or loss, and other changes in carrying amount are recognized in equity.

Foreign exchange differences arising from the translation of non-monetary financial assets and liabilities are considered as part of the fair value changes and those differences are accounted for in the accounts in which the fair value changes.

2.6 Tangible assets

Tangible assets are carried at cost, less any accumulated depreciation and impairment loss.

Assets held for use in the construction, or for leasing, administrative or any other purposes are carried at cost, less any impairment. Legal charges are also added to costs. For assets that need substantial time to be ready for use or sale, borrowing costs are capitalized based on the Company’s accounting policy.

Such assets are depreciated, on the same basis used for other fixed assets, when they are ready to use. Assets, other than land and ongoing constructions, are depreciated over their expected useful lives by using the straight line method. Estimated useful life, residual value, and amortization method are reviewed at the end of each annual reporting period, with the effect of any changes in estimate being accounted for on a prospective basis.

Assets acquired under finance lease are depreciated as the same basis as tangible assets or, where shorter, the term of the relevant lease.

Gain or loss arising on the disposal or retirement of an item of tangible assets are determined as the difference between the sales proceeds and the carrying amount of the asset and is recognized to profit or loss.

**CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS
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(Amounts expressed in Turkish Lira (“TL”) unless otherwise indicated.)

2. Summary of the Accounting Policies (Continued)

2.6 Tangible assets (Continued)

Depreciation periods for tangible assets are presented in the table below:

	<u>Useful Life</u>
Buildings	50 years
Vehicles	5 years
Fixtures	10 years
Leasehold Improvements	5 years

2.7 Investment Properties

Investment property is held to earn rentals and/or for capital appreciation is carried at cost less accumulated depreciation and any accumulated impairment losses. Carrying amount includes the cost of replacing part of an existing investment property at the time that cost is incurred if the recognition criteria are met; and excludes the costs of day to day servicing of an investment property. Depreciation is provided on investment property on a straight line basis. Depreciation period for investment property is nil for land, and 50 years for buildings.

Investment properties are derecognized when either they have been disposed of or when the investment property is permanently withdrawn from use and no future economic benefit is expected from its disposal. Any gains or losses on the retirement or disposal of an investment property are recognized in profit or loss in the period of retirement or disposal.

Transfers are made to or from investment property only, when there is a change in use. For a transfer from investment property to owner occupied property, the deemed cost for subsequent accounting is the fair value at the date of change in use. If owner occupied property becomes an investment property, the Company accounts for such property in accordance with the policy applied to “Property, Plant and Equipment” up to the date of change in use.

Real estates held under finance lease are classified as investment properties.

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2. Summary of the Accounting Policies (Continued)

2.8 Intangible Assets

Intangible assets acquired

Intangible assets acquired are carried at cost less accumulated amortization and accumulated impairment losses. Amortization is charged on a straight-line basis over their estimated useful lives. Estimated useful life and amortization method are reviewed at the end of each annual reporting period, with the effect of any changes in estimate being accounted for on a prospective basis.

Computer software

Acquired computer software licenses are capitalized on the basis of the costs incurred from the date of acquisition to the date to bring the specific software in use. These costs are capitalized under intangible advances account and amortized over their estimated useful lives (1 to 10 years).

Costs associated with developing or maintaining computer software programmes are recognized as expense as incurred. Costs that are directly associated with the development of identifiable and unique software products that are controlled by the Company and will probably provide more economic benefits than costs in one year are recognized as intangible assets. Costs include software development employee costs and an appropriate portion of relevant overheads. Computer software development costs recognized as assets from the date that the assets become to provide economical benefit are amortized over their estimated useful lives (September 30, 2018: 5 years – December 31, 2017:5 years).

2.9 Financial Assets

Investments, other than those that are classified as financial assets at fair value through profit and loss, are initially measured at fair value, net of transaction costs except for those financial assets classified as at fair value through profit or loss, which are initially measured at fair value.

Investments are recognized and derecognized on a trade date, where the purchase or sale of an investment under a contract, whose terms require delivery of the investment within the timeframe established by the market concerned.

Financial assets are classified into the following specified categories: financial assets as “available-for-sale” (AFS) financial assets, “financial assets at fair value through profit and loss” and “loans and receivables”. As of September 30, 2018, the Company has no financial assets at fair value through profit and loss (December 31, 2017: None).

Effective interest method

Effective interest method is a method of calculating the amortized cost of a financial asset and of allocating interest income over the relevant period. The effective interest rate is the rate that exactly discounts estimated future cash receipts through the expected life of the financial asset, or, where appropriate, a shorter period.

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2. Summary of the Accounting Policies (Continued)

2.9 Financial Assets (Continued)

Available-for-sale financial assets

Investments other than a) held-to-maturity, b) held for trading, or c) loans and receivables are classified as available-for-sale financial assets.

Available-for-sale financial assets are measured at subsequent reporting dates at fair value except available-for-sale investments that do not have quoted prices in an active market and their fair values cannot be reliably measured are stated at cost and restated to the equivalent purchasing power. Gains and losses arising from available-for-sale financial assets are included in profit or loss for the period. Changes in the fair value of such these assets are recognized in the equity. When the related asset is disposed of or is determined to be impaired, at which time the cumulative gain or loss previously recognized in equity is included in the profit or loss for the period. Impairment losses recognized in profit or loss for equity investments classified as available-for-sale are not subsequently reversed through profit or loss.

Impairment losses recognized in profit or loss for debt instruments classified as available-for-sale are subsequently reversed if an increase in the fair value of the instrument can be objectively related to an event occurring after the recognition of the impairment loss.

Financial Assets at Insured's Risk

Such assets are classified as available for sale and held to maturity financial assets. Available for sale financial assets are carried at fair value and revaluation difference arising from amortized cost is recognized under the statement of income. Also, 5% of the difference in between the fair value and amortized cost is recognized under equity and 95% of insurance technical reserves that are attributable to insurees are recognized in the Insurance Technical Reserves - Life Mathematical Reserves account. Assets that are not carried at fair value are carried at amortized cost using the effective interest rate method.

Loans and receivables

Trade receivables, loans, and other receivables that have fixed or determinable payments that are not quoted in an active market are classified as loans and receivables. Loans and receivables are measured at amortized cost using the effective interest method, less any impairment.

Associates

An associate is an entity that retains at the shares of voting rights or has significant power over another entity. The difference between carrying value and fair value (to the extent that it is measured reliably) of such assets are recognized in shareholders' equity and assets that have fair value are carried at fair value while the other assets are carried at book value.

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

2. Summary of the Accounting Policies (Continued)

2.10 Impairment of Assets

Impairment of non-financial assets

Assets that are subject to amortization are reviewed for impairment whenever events or changes in circumstances indicate, that the carrying amount may not be recoverable. An impairment loss is recognized for the amount by which the asset’s carrying amount exceeds its recoverable amount.

The recoverable amount is the higher of an asset’s fair value less costs to sell and value in use. For the purposes of assessing impairment, assets are grouped at the lowest levels for which there are separately identifiable cash flows (cash-generating units).

Non-financial assets other than goodwill that are impaired, are reviewed for possible reversal of the impairment at each reporting date.

Impairment of financial assets

The Company assesses its financial assets, other than those at FVTPL, at each balance sheet date whether there is any objective evidence that a financial asset or group of financial assets classified as held-to-maturity, available-for-sale or loans and receivables is impaired.

A financial asset or portfolio of financial assets is impaired and an impairment loss incurred if there is objective evidence that an event or events since initial recognition of the asset have adversely affected the amount or timing of future cash flows from the asset.

For loans and receivables, the amount of the impairment is the difference between the asset’s carrying amount and the present value of estimated future cash flows, discounted at the original effective interest rate.

The carrying amount of the financial asset is reduced by the impairment loss directly for all financial assets except for trade receivables where the carrying amount is reduced through the use of an allowance account. When a trade receivable is uncollectible, it is written off against the allowance account. Changes in the carrying amount of the allowance account are recognized in profit or loss.

Except for AFS equity instruments, 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, the previously recognized impairment loss is reversed through profit or loss to the extent that the carrying amount of the investment at the date the impairment is reversed does not exceed what the amortized cost would have been had the impairment not been recognized.

For AFS equity securities, any increase in fair value subsequent to an impairment loss is recognized directly in equity.

**CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS
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(Amounts expressed in Turkish Lira (“TL”) unless otherwise indicated.)

2. Summary of the Accounting Policies (Continued)**2.11 Derivative Financial Instruments**

The Company uses foreign currency swap and option contracts, the Company uses end of period market exchange rates and interest rates to calculate market value of foreign exchange swap contracts. As of September 30, 2018, the Company has derivative financial instruments TL 130.754.604. (December 31, 2017: None).

2.12 Offsetting Financial Instruments

Financial assets and liabilities are offset only when there is a legally enforceable right to offset the recognised amounts and there is an intention to settle on a net basis, or when the acquisition of the asset and the settlement the liability take place simultaneously.

2.13 Cash and Cash Equivalents

Cash and cash equivalents comprise cash on hand and demand deposits and other short-term highly liquid investments, which have maturities with three months or less from date of acquisition and that are readily convertible to a known amount of cash and are subject to an insignificant risk of changes in value (Note 14).

2.14 Share Capital

As of September 30, 2019, the Company’s nominal capital is TL 306.000.000 (December 31, 2018: TL 306.000.000). Share capital is represented by 30.600.000.000 of equity shares having a nominal amount of TL 0,01 each. The share capital structure of the Company is as follows:

	30 September 2019		31 December 2018	
	Rate %	Amount TL	Rate %	Amount TL
H.Ömer Sabancı Holding A.Ş.	36,00	110.160.000	36,00	110.160.000
Ageas Insurance International NV	36,00	110.160.000	36,00	110.160.000
Other	28,00	85.680.000	28,00	85.680.000
	100,00	306.000.000	100,00	306.000.000

Agreement about the sale of %50 of 18.965.880.200 units of Aksigorta A.Ş. shares with TL 189.658.802 nominal value that belong to H.Ö. Sabancı Holding (“Holding”) portfolio was signed with Ageas Insurance International N.V. at February 18, 2011. At the date of July 29, 2011, 9.482.940.100 units of Aksigorta A.Ş. shares that correspond to %50 of the Holding’s portfolio have been transferred to Ageas Insurance International N.V. with the sale price (excluding the corrections) of USD 220.029.000.

The Company has accepted the registered capital system set out in accordance with the provisions of Law No: 2499 and applied the system as of 15 June 2000 upon the permission no: 67/1039 granted by the Capital Markets Board.

As of September 31, 2019, Company has TL 500.000.000 registered share capital ceiling. (December 31, 2018: TL 500.000.000). More extensive details related to the company capital are disclosed in the Note 15.

**CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS
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(Amounts expressed in Turkish Lira (“TL”) unless otherwise indicated.)

2. Summary of the Accounting Policies (Continued)

2.15 Insurance and Investment Contracts

Insurance Contracts:

Insurance contracts are contracts in which one part accepts a significant insurance risk and pays compensation (insurer) to the other part (insuree) when any uncertain case affects the insuree. The Company makes reinsurance agreements in which the Company (ceding company) is compensated by the insurer (reinsurer company) for one or more claims. Insurance contracts entered into by the Company under which the contract holder is another insurer (reinsurance) are included with insurance contracts.

Insurance and reinsurance contracts of the Company are included in classification of Insurance contracts.

Insurance contracts are accounted when the insurance risk is transferred, and classified as an insurance contract as of the maturity date and/or amortization of the all contractual rights and liabilities.

Investment Contracts:

The accumulation component present in some life insurance contracts is measured by the Company on a separate basis; On the other hand, as the accounting policies require the recognition of rights and obligations related with the accumulation component, regardless of the measurement principles, the insurance and investment components are not decomposed.

Reinsurance agreements

Reinsurance agreements are the agreements agreed by the Company and reinsurance company for the loss which may occur in one or more insurance agreements signed by the Company, and those meet all conditions to be classified as insurance contract and those whose costs are paid.

The Company has excess of loss, surplus and quota share treaty agreements in related branches. In the context of excess of loss agreements, the ceded premiums are accounted for on accrual basis over the related period. The ceded premiums and claims of other agreements are accounted on the basis of the income and loss from related insurance contracts.

The Company has surplus reinsurance aggregation in fire, marine, engineering and other accident branches. Besides, The Company has excess of loss agreements in fire, marine and engineering branches. The Company continues to be exposed to the insurance risk under the insurance contracts whereas the liability of the reinsurer ceases by the end of the agreement period. Company has annual proportional quota-share reinsurance agreement for third person liability, electronic equipment, personal accident, health, professional liability, machinery breakdown and bus compulsory chair branches. Mentioned reinsurance agreements, the reinsurer's liability continues even after expiration of the agreement in the run-off agreements. Catastrophic excess of loss re-insurance agreement, natural disasters such as flood and earthquake is also protected in these branches.

In addition, the Company has facultative reinsurance agreements signed separately for certain risks based on certain policies.

**CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS
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(Amounts expressed in Turkish Lira (“TL”) unless otherwise indicated.)

2. Summary of the Accounting Policies (Continued)

2.15 Insurance and Investment Contracts (Continued)

Premiums Transferred to Social Security Institution

The collection and settlement of expenses with respect to the medical care related services provided to the injured people due to the traffic accidents have been regulated by Article 98 of Road Traffic Act numbered 2918 altered by Article 59 of “The Law on Restructuring of Some Receivables and Changes in Social Security and General Insurance Law and Other Laws and Law Decrees” (the “Law”) numbered 6111 and dated February 25, 2011. In this context, all the traffic accident related medical care services provided by any public or private health institution will be covered by Social Security Institution (“SSI”) regardless of social security status of the injured. Besides, in accordance with the temporary Article 1 of the Law, all of the expenses with respect to the traffic accident related medical care services provided before enforcement of the Law, will also be covered by SSI.

The liability of the insurance companies with respect to the service costs to be incurred in the context of abovementioned articles has been determined in accordance with the provisions of “The Regulation on the Principles of Collection of the Costs of the Health Services Provided due to the Traffic Accidents” dated 27 August 2011 (“The Regulation”), “The Communiqué on the Principles of the Implementation of the Regulation on the Principles of Collection of the Costs of the Health Services Provided due to the Traffic Accidents” dated September 15, 2011 and numbered 2011/17 (the “Communiqué numbered 2011/17”) and “The Communiqué on the Accounting of Payments to Social Security Institution (“SSI”) with respect to Treatment Expenses and Introduction of New Account Codes to Insurance Account Chart” dated 17 October 2011 (the “Communiqué numbered 2011/18”), the regulation (the “Communique numbered 2012/3”) making changes in “The Regulation on the Principles of Collection of the Costs of the Health Services Provided due to the Traffic Accidents” dated March 16, 2012 and numbered 2012/3 and the communique about changes related “the Principles of Collection of the Costs of the Health Services Provided due to the Traffic Accidents” dated April 30, 2012 and numbered 2012/6 (Note 2.24) (the “Communique numbered 2012/6”). Within this framework, the Group is required to cede a certain amount of premiums to be determined in accordance with the Regulation and the Communiqué numbered 2011/17 to SSI in relation to policies issued as of February 25, 2011 the notice numbered 2012/3 and the communiqué numbered 2012/6 in “Compulsory Transportation”, “Compulsory Traffic” and “Compulsory Motor Personal Accident” branches regarding the expenses with respect to the traffic accident related medical care services provided after enforcement of the Law.

Based on the aforementioned regulations, the Company has calculated the amount of the premiums to be ceded to SSI in January 1 - September 30, 2019 accounting period as TL 92.751.580 (January 1 – September 30, 2018: TL 72.226.697) and an unearned premium reserve amounting to TL 13.014.099 (January 1 - September 30, 2018: TL 14.721.599) for the period ended as of January 1 - September 30, 2019; classified under the accounts of “Premiums ceded to SSI” and “Change in SSI share of of Unearned Premiums Reserve”, respectively (Note 19).

In the Board of Directors meeting of The Association of the Insurance and Reinsurance Companies of Turkey dated September 22, 2011 and numbered 18, it was decided to appeal Council of State for the “suspense of execution” and “cancellation” of the Regulation and the Communiqué numbered 2011/17; and the cancellation of related provisions of the Law as being contradictory to the Constitution. The legal procedures are in progress as of the date of the preparation of the financial statements.

2.16 Insurance and Investment Contracts With Discretionary Participation Features

None (December 31, 2018: None).

**CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS
AS OF SEPTEMBER 30, 2019**

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

2. Summary of the Accounting Policies (Continued)

2.17 Investment Contracts without Discretionary Participation Features

None (December 31, 2018: None).

2.18 Borrowings

None (December 31, 2018: None).

2.19 Employee Benefits

The Company accounts for its liability related to employment termination and vacation benefits according to “Turkish Accounting Standards Regarding Employee Benefits” (“TAS 19”) and classifies in balance sheet under the account “Provision of Employment Termination Benefits”.

According to the Turkish Labour Law, the Company is required to pay termination benefits to each employee whose jobs are terminated except for the reasons such as resignation, retirement and attitudes determined in Labour Law. The provision for employment termination benefits is calculated over present value of the possible liability in scope with the Labour Law by considering determined actuarial estimates (Note 22).

2.20 Provisions

Provisions are recognized when the Company has a present legal or constructive obligation as a result of past events; it is probable that an outflow of resources will be required to settle the obligation; and the amount can be reliably estimated. Provisions are measured over expenditures expected to be required to settle the obligation by considering the risks and uncertainties related to the obligation at the balance sheet date. When the provision is measured by using the estimated cash outflows that are required to settle the obligation, the carrying value of the provision is equal to present value of the related cash outflows.

Where some or all of the expenditure required to settle a provision is expected to be reimbursed by another party, the reimbursement shall be recognized as an asset if and only it is virtually certain that reimbursement will be received and the reimbursement can be reliably estimated.

Liabilities that arises from past events and whose existence will be confirmed only by the occurrence or non-occurrence of one or more uncertain future events not wholly within the control of the entity are classified as contingent liabilities and not included in the non-consolidated financial statements (Note 23).

**CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS
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(Amounts expressed in Turkish Lira (“TL”) unless otherwise indicated.)

2. Summary of the Accounting Policies (Continued)

2.21 Accounting for revenues

Written Premium and Commission

Written premiums represent premiums on policies written during the year, net of cancellations. Premium income is recognized in the financial statements on accrual basis by allocating the unearned premium provision over written premiums.

Commission income received in relation to ceded premiums to reinsurance companies is accrued in the related period and classified in technical part under operating expenses in the income statement.

The part of paid amounts to the assistance services which hit the following periods are deferred in accordance with the Technical Provisions Regulation numbered 27655 and dated July 28, 2010.

Interest income and expense

Interest income and expenses are accounted on an accrual basis in the related period’s profit/loss. Interest income includes income gains from the coupons of the fixed return investment instruments and valuation of discounted government bonds based on internal rate of return method.

Dividend income

Dividend income from the equity share investments are recognized when the shareholder has the right to receive dividends.

2.22 Finance Lease - the Company as lessee

Leases are classified as finance leases whenever the terms of the lease transfer substantially all the risks and rewards of ownership to the lessee. All other leases are classified as operating leases. Assets held under finance leases are recognized as assets of the Company at their fair value at the inception of the lease or, if lower, at the present value of the minimum lease payments. The corresponding liability to the lessor is included in the balance sheet as a finance lease obligation. Lease payments are apportioned between finance charges and reduction of the lease obligation so as to achieve a constant rate of interest on the remaining balance of the liability. Finance charges are charged to profit or loss, unless they are directly attributable to qualifying assets, in which case they are capitalized in accordance with the Company’s general policy on borrowing costs.

Operational lease

The payment of the operational lease is charged to the income statement on a straight-line basis over the lease period (The incentives received or to be received from the lessor and payments made to intermediaries to acquire the lease contract are also charged to the income statement on a straight-line basis over the lease period). As at September 30, 2018, the Company has paid in advance in amounting 4.468.899 is short-term. As at September 30, 2018, amount the TL 76.451.507 (USD 12.762.764) the maturity of outstanding lease liability is between 1 October, 2018- 5 May, 2024 (31 December 2017 TL 54.022.477)

**CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS
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(Amounts expressed in Turkish Lira (“TL”) unless otherwise indicated.)

2. Summary of the Accounting Policies (Continued)

2.23 Profit Share Distribution

Listed companies distribute dividend in accordance with the Communiqué No. II-19.1 issued by the CMB which is effective from February 1, 2014.

Companies distribute dividends in accordance with their dividend payment policies settled and dividend payment decision taken in general assembly and also in conformity with relevant legislations. The communiqué does not constitute a minimum dividend rate. Companies distribute dividend in accordance with the method defined in their dividend policy or articles of incorporation. In addition, dividend can be distributed by fixed or variable installments and advance dividend can be paid in accordance with profit on interim financial statements of the Company.

In accordance with the Turkish Commercial Code (TCC), unless the required reserves and the dividend for shareholders as determined in the article of association or in the dividend distribution policy of the Company are set aside, no decision may be made to set aside other reserves, to transfer profits to the subsequent year or to distribute dividends to the holders of usufruct right certificates, to the members of the board of directors or to the employees; and no dividend can be distributed to these persons unless the determined dividend for shareholders is paid in cash.

The excess portion of the inflation adjustment of the general reserves including prior year losses and profits, share premiums and shareholders’ equity excluding capital is considered in the calculation of the net distributable profit.

2.24 Hedge Accounting

All foreign currency payments, collections and investments result in a foreign exchange position. The foreign currency cash flow transaction has faced the risk of exchange rate fluctuations effect the Company’s financial position positively or negatively. In order to forecast the transaction made via foreign currencies that have a high possibility of realization and minimize the effect of exchange rate fluctuations on the Company’s financial position, hedge accounting has been applied. Changes in the value of the hedge instrument arising from exchange rate changes has been reclassified under equity, changes except for exchange rate has been reclassified under current period income statement. The gains or losses recognized under equity has been transferred to related profit/ loss accounts when the transaction is completed or the profit for the period is affected by the expected result of the transaction. In the case of expectation of estimated transaction’s end, accumulated gain or loss recognized under equity has been accounted as current period’s profit or loss in the financial statements. Effectiveness of hedge transaction has been measured and evaluated in each reporting period. As of March 31, 2018 the Company has booked the hedging transaction under “Special funds“ account item under equity (Note 34.5)

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2. Summary of the Accounting Policies (Continued)

2.25 Related parties

Parties are considered related to the Company 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.

In the financial statements and related notes dated December 31, 2016 and December 31, 2016, the Company management, groups associated to H.Ö. Sabancı Holding and Ageas Insurance International N.V. are defined as related parties.

**CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS
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(Amounts expressed in Turkish Lira (“TL”) unless otherwise indicated.)

2. Summary of the Accounting Policies (Continued)

2.26 Foreign currency transactions

Transactions are recorded in TL, which represents the Company’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 the statement of 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. For the conversion of liabilities the exchange rate stated at the contract is used.

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

	30 September 2019		31 December 2018	
	USD / TL	EUR / TL	USD / TL	EUR / TL
Buying rate	5,6591	6,1836	5,2609	6,0280
Selling rate	5,6778	6,2040	5,2783	6,0479

4. Significant Accounting Estimates and Requirements

Preparation of financial statements requires the use of assumptions and estimates that might affect the amounts of assets and liabilities reported as of balance sheet date, explanation of the conditional assets and liabilities and amounts of the income and expenses reported throughout the accounting period. Accounting evaluations, estimates and assumptions are evaluated taking into consideration past experience, other factors, current conditions and reasonable expectations for future events. Such evaluations and estimates might differ from actual consequences, even though they are based on the best knowledge of the management about current events and transactions.

One of the most important accounting estimates for the Company is to estimate the final net liabilities relating to the expenses to arise from the effective policies. As per its nature, estimating liabilities regarding the insurance business includes the evaluation of many uncertainties.

CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS AS OF SEPTEMBER 30, 2019

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4.1 Insurance Risk

4.1.1 Objective of managing risks arising from insurance contracts and policies used to minimize such risks

Insurance risk is the probability of risk exposure that is covered under any insurance contracts and the uncertainty of the magnitude of the claims in relation to the risk exposed. Due to the nature of insurance transactions, risks are incidental and hard to anticipate. Maximum risk that the Company bears is limited to the coverage amount specified in the insurance contract.

The Company has adopted central risk assessment policy and this policy is applied in relation to the Company’s specified operations and limitations. Principally, in risk assessment, potential claims are measured based on the past experience, similar risk comparisons and risks in relation to production process. Location, geographical area, field of activity and fire and theft measures are also key issues used in the assessment of the insured risk.

4.1.2 Details of insurance risk, including the following information (details prior and/or subsequent to minimizing risks through reinsurance);

4.1.2.1 Sensitivity to insurance risk

The Company is managing its insurance risk by policy production strategies, reinsurance contracts and effective settlement and payment operations.

The Company’s policy production strategy follows an effective risk management in the policy production process considering the nature, extent, geographical area and accurate distribution of the risk incurred.

Reinsurance contracts include excess of loss (quota-share and excess loss) and catastrophic coverage. The Company can also enter into reinsurance contracts with facultative participation under its reinsurance programme.

Reinsurance Company

2019		2018	
Reinsurance Company	Standard & Poors Rating	Reinsurance Company	Standard & Poors Rating
African Re	A-	Allianz Risk Transfer	AA-
ARIG	NR	Amlin Re	A
Asia Capital Re	A-	Arab Re	-
China Re	A	ARIG	-
Covea Cooperations	A+	Asia Capital	A-
Everest Re	A+	XLCatlin Re	A+
Fair Pool	NR	China Re	A
GIC	NR	Covea	A+
Hannover Re	AA-	Everest Re	A+
Korean Re	A	GIC	-
Mapfre Re	A	Hannover Re	AA-
Milli Re	trA+	QBE	A+
MS Amlin AG	A	Korean Re	A
Odyssey Re	A-	Malaysian Re	-
Partner Re	A+	Mapfre Re	A
QBE	A+	Milli Re	tr AA-
Samsung Fire&Marine Re	AA-	Odyssey Re	A-
Sava Re	A	Scor	AA-
Scor Global P&C	AA-	Sompo Japan	A+
Toa Re	A+	Toa Re	A+
Tokio Millenium Re	A+	Trust Re	A-
Trust Re	NR	VIG	A+
Unipol Re	NR	Coface	Fitch: AA-
VIG	A+		
XL Catlin Re	AA-		

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4. Insurance and Financial Risk Management (Continued)

4.1.2.2 Insurance risk concentrations with explanations of how management identify risk concentrations and common features of each concentration (the nature of insurance, geographic region or currency)

Generally, the Company’s insurance contracts include fire and natural disasters, marine, accident, motor vehicles, air crafts, water crafts, general losses, motor vehicles liability, air crafts liability, general liability, financial losses, legal protection, illness/health and life branches. The Company’s gross and net insurance risk concentrations (after reinsurance) in terms of insurance branches are summarized as below:

	30 September 2019			31 December 2018		
	Gross Total Claims Liability	Reinsurance Share of Total Claims Liability	Net Total Claims Liability	Gross Total Claims Liability	Reinsurance Share of Total Claims Liability	Net Total Claims Liability
Fire and Natural Disaster	980.568.618	(940.445.787)	40.122.831	592.426.425	(550.469.556)	41.956.869
Motor Crafts Liability	768.335.899	(22.586.109)	745.749.790	602.744.902	(15.996.721)	586.748.181
General Losses	280.773.859	(265.724.829)	15.049.030	267.069.677	(256.781.293)	10.288.384
General Liability	432.122.470	(314.479.916)	117.642.554	317.998.998	(226.026.299)	91.972.699
Motor Own Damage	112.031.762	(204)	112.031.558	94.454.919	(181)	94.454.738
Fidelity Guarantee	81.295.448	(77.926.758)	3.368.690	74.959.768	(72.180.205)	2.779.563
Financial Losses	134.450.409	(128.679.741)	5.770.668	56.541.493	(49.053.205)	7.488.288
Transportation	59.130.196	(48.143.765)	10.986.431	39.538.203	(33.365.205)	6.172.998
Air Crafts	31.112.106	(31.112.103)	3	15.356.409	(15.350.024)	6.385
Health	18.405.922	(13.498.258)	4.907.664	16.500.937	(13.142.555)	3.358.382
Accident	5.094.365	(2.309.314)	2.785.051	4.603.245	(2.640.550)	1.962.695
Water Crafts	34.277.587	(31.564.501)	2.713.086	5.392.784	(3.716.914)	1.675.870
Air Crafts Liability	14.560.013	(14.547.522)	12.491	5.563.092	(5.554.756)	8.333
Credit	2.077.501	(1.973.625)	103.876	2.715.263	(2.598.366)	116.897
Legal Protection	397.090	-	397.090	283.101	-	283.101
Life		-		128.954	-	128.954
Total	2.954.633.245	(1.892.992.432)	1.061.640.813	2.096.278.170	(1.246.875.830)	849.402.337

(*) Total claim liability includes all outstanding claims reserves and IBNR as of the balance sheet date.

CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS AS OF SEPTEMBER 30, 2019

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

4. Insurance and Financial Risk Management (Continued)

4.1.2.3 Comparison of incurred claims with past estimations (claims development process)

Outstanding Claim and Compensation Provision:

	30 September 2019			December 31, 2018			
	Effect on Current Period (Net)	Gross Total Claims Liability	Reinsurance Share of Total Claims Liability	Net Total Claims Liability	Gross Total Claims Liability	Reinsurance Share of Total Claims Liability	Net Total Claims Liability
Unpaid Claims	(133.251.213)	2.583.626.359	(1.902.880.879)	680.745.480	1.783.361.109	(1.235.866.842)	547.494.267
Discount Effect of Reported Claims	56.594.008	(356.372.283)	121.421.579	(234.950.704)			
Claim Provisions (*)	(135.710.224)	727.379.169	(111.533.132)	615.846.037	563.893.858	(83.758.045)	480.135.813
Non-life Total	(212.367.429)	2.954.633.245	(1.892.992.432)	1.061.640.813	2.096.149.215	(1.246.875.831)	849.273.384
Life	(7.358)	136.311	-	136.311	128.953	-	128.953
Grand Total	(212.374.787)	2.954.769.556	(1.892.992.432)	1.061.777.124	2.096.278.168	(1.246.875.831)	849.402.337

(*) Claim provisions include all additional provisions within unpaid claims in the total outstanding compensation provision in the balance sheet date.

	30 September 2019			30 September 2018		
	Gross Total Claims Liability	Reinsurance Share of Total Claims Liability	Net Total Claims Liability	Gross Total Claims Liability	Reinsurance Share of Total Claims Liability	Net Total Claims Liability
Beginning of Period - 1 January	1.783.361.109	(1.235.866.842)	547.494.267	1.070.409.825	(761.572.738)	308.837.087
Opened in the Period	2.074.543.692	(1.032.085.839)	1.042.457.853	1.844.383.193	(857.783.913)	986.599.280
Paid from Current Period (-)	(853.766.556)	244.598.107	(609.168.449)	(719.348.318)	201.262.274	(518.086.044)
Paid from Previous Period (-)	(420.511.886)	120.473.695	(300.038.191)	(279.746.568)	78.268.662	(201.477.906)
Period End Reported Claims	2.583.626.359	(1.902.880.879)	680.745.480	1.915.698.132	(1.339.825.715)	575.872.417
Life	136.311	-	136.311	127.808	-	127.808
Discount Effect of Reported Claims	(356.372.283)	121.421.579	(234.950.704)	(249.674.382)	81.161.836	(168.512.546)
IBNR	727.379.169	(111.533.132)	615.846.037	459.655.246	(76.445.350)	383.209.896
Total	2.954.769.556	(1.892.992.432)	1.061.777.124	2.125.806.804	(1.335.109.229)	790.697.575

CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS AS OF SEPTEMBER 30, 2019

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4. Insurance and Financial Risk Management (Continued)

4.1.2.3 Comparison of incurred claims with past estimations (claims development process) (continued)

Claims development tables prepared in accordance with the Technical Provision Regulations which are used in the ACLM calculation are explained below:

Gross claim development table prepared on the principles of incurred claims by September 30, 2019:

	1.10.2012 30.09.2013	1.10.2013 30.09.2014	1.10.2014 30.09.2015	1.10.2015 30.09.2016	1.10.2016 30.09.2017	1.10.2017 30.09.2018	1.10.2018 30.09.2019	Gross Claim
Claim realized in the accident period	693.777.311	793.535.826	897.712.457	774.300.100	1.303.880.772	1.403.265.675	2.269.629.268	8.136.101.411
1 year later	164.495.096	222.079.374	273.265.891	216.085.036	977.423.065	616.137.327	-	2.469.485.788
2 years later	74.607.207	114.023.554	154.000.585	323.832.199	624.290.034	-	-	1.290.753.578
3 years later	59.862.152	100.449.991	164.975.143	301.911.065	-	-	-	627.198.352
4 years later	51.478.274	97.695.185	159.545.021	-	-	-	-	308.718.480
5 years later	56.825.278	99.321.021	-	-	-	-	-	156.146.299
6 years later	59.201.843	-	-	-	-	-	-	59.201.843
Total	1.160.247.161	1.427.104.951	1.649.499.097	1.616.128.400	2.905.593.871	2.019.403.002	2.269.629.268	13.047.605.751

Gross claim development table prepared on the principles of incurred claims by December 31, 2018:

	1.01.2012 31.12.2012	1.01.2013 31.12.2013	1.01.2014 31.12.2014	1.01.2015 31.12.2015	1.01.2016 31.12.2016	1.01.2017 31.12.2017	1.01.2018 31.12.2018	Gross Claim
Claim realized in the accident period	805.358.245	673.026.038	838.172.102	841.913.192	930.621.837	1.366.238.878	1.564.047.984	7.019.378.276
1 year later	202.466.775	160.175.099	239.937.131	216.699.946	420.934.178	793.577.616	-	2.033.790.745
2 years later	63.973.783	84.819.582	144.014.862	126.303.760	345.579.004	-	-	764.690.990
3 years later	54.371.895	67.301.174	120.606.234	110.917.361	-	-	-	353.196.664
4 years later	51.998.615	65.886.722	133.086.346	-	-	-	-	250.971.683
5 years later	47.498.155	65.079.638	-	-	-	-	-	112.577.793
6 years later	48.136.076	-	-	-	-	-	-	48.136.076
Total	1.273.803.544	1.116.288.253	1.475.816.675	1.295.834.258	1.697.135.019	2.159.816.494	1.564.047.984	10.582.742.226

4.2.1 Capital risk management and capital requirement

The Company’s main purpose in capital management is to maintain its going concern status as an income yielding company and to protect shareholder and corporate partners’ benefits while sustaining the most effective capital structure in order to reduce capital costs.

The Company measures its adequacy semi-annually in accordance with the Decree “Measurement and Assessment of Capital Adequacy of Insurance and Reinsurance Companies and Pension Funds” published in the Official Gazette No: 26761 on January 19, 2008. As of June 30, 2019, the Company’s required capital is TL 670.438.613

4.2.2 Financial risk factors

The Company is exposed to market risk (exchange rate risk, interest rate risk, and price risk), credit risk, and liquidity risk due to its assets and liabilities and reinsurance assets and liabilities. The Company’s risk management generally focuses on minimizing the probable adverse effects of uncertainties in financial markets over the Company’s performance. The Company’s exposure to interest rate risk and credit risk in general is due to its financial investments and insurance receivables, respectively.

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4. Insurance and Financial Risk Management (Continued)

4.2.2 Financial risk factors (Continued)

Market risk

The Company is exposed to market risk due to fluctuations in the exchange rates, interest rates and equity share prices.

Exchange rate risk

The Company’s foreign currency denominated assets and liabilities expose the Company to exchange rate risks. These risks are monitored by analyzing exchange rate position. The details of the Company’s foreign currency denominated assets and liabilities as of September 30, 2019 and December 31, 2018 are presented in details in Note 12.4.

Sensitivity to exchange rate risk

The Company’s sensitivity to a 10% increase/decrease in USD and Euro currencies are presented below. Sensitivity analysis only includes foreign currency denominated monetary assets outstanding at the end of period and indicates the effects of 10% changes in exchange rates. Positive value indicates an increase in profit/loss and other equity items.

	30 September 2019		31 December 2018	
	USD Effect	EUR Effect	USD Effect	EUR Effect
Profit / Loss Increase	11.772.788	4.372.635	7.937.030	6.534.897
Profit / Loss (Decrease)	(11.772.788)	(4.372.635)	7.937.030	(6.534.897)

Interest rate risk

The Company is required to manage its interest rate risks due to price fluctuations in its financial instruments arising from changes in interest rates. The Company’s sensitivity to interest rate risk results from the mismatch in maturities of its assets and liabilities. Interest rate risk is managed by offsetting the assets that are affected by the interest rate fluctuations against the liabilities in same nature.

	30 September 2019	31 December 2018
Total	Effect on profit and profit reserves	
Market interest rate increase / (decrease)	TL	
+% 1	(6.520.370)	(226.353)
-% 1	7.934.985	253.313
Financial assets available for sale	Effect on profit and profit reserves	
Market interest rate increase / (decrease)	TL	
+% 1	(6.520.370)	(195.413)
-% 1	7.934.985	216.688
+% 1 Financial Assets with Risks on Policy Holders	(30.940)	
-% 1 Financial Assets with Risks on Policy Holders	34.626	

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

4. Insurance and Financial Risk Management (Continued)

4.2.2 Financial risk factors (Continued)

Price risk

The Company is exposed to price risk due to its available for sale financial assets. As of the reporting date, if data used in the valuation method is increased/decreased by 10% and all variables remain fixed, the Company’s sensitivity is as follows. The sensitivity of the Company for the price risk is arising from the available for sale financial assets as of December 31, 2017.

	30 June 2019	31 December 2018
Total		Available For Sale
Price increase / (decrease)		TL
+% 10	64.668.409	55.818.742
-% 10	(64.668.409)	(55.818.742)

Credit risk

Credit risk is the risk that the debtor defaults on its obligations under the terms of the transaction. Credit risk is managed by setting out limits and providing guarantees for receivables from a specific party. Limits and guarantees are determined based on the assessment of the respective party’s financial ability and trading capacity. The Company is exposed to credit risk in Turkey because it mainly performs its operations in Turkey.

As of September 30, 2019, the Company has presented its receivables from insurance operations and guarantees received and provision for doubtful receivables in Note 12.1.

CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS AS OF SEPTEMBER 30, 2019

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

4. Insurance and Financial Risk Management (Continued)

4.2.2 Financial risk factors (Continued)

Liquidity risk

Liquidity risk is the possibility of non-performance of the Company’s due liabilities. Events that give rise to funding shortages, such as; market deteriorations and decrease in credit ratings, are the main reasons of liquidity risk. The Company manages its liquidity risk through having adequate cash and cash equivalents in order to fulfill its current and possible liabilities by allocating its funds.

Liquidity risk table

30 September 2019

	Up to 1 month	1 - 3 month	3 months-1 year	1 -5 years	5 years and over	No maturity	Total
Cash and Cash Equivalents	1.112.116.162	1.050.515.676	26.690.304	-	-	21.344.437	2.210.666.579
Financial Assets Available for Sale	17.096.579	26.529.501	104.671.162	359.408.296	52.123.268	39.225.891	599.054.697
Held-to-maturity financial assets	-	-	-	47.629.402	-	-	47.629.402
Investments with Risks on Policy Holders	-	-	-	1.723.101	-	-	1.723.101
Receivables From Main Operations	236.817.327	153.346.861	203.548.290	21.698.656	-	-	615.411.134
Due from Related Parties	-	-	160.153	-	-	-	160.153
Other Receivables	-	-	14.766.377	-	-	-	14.766.377
Prepaid Expenses and Income Accruals	89.556.336	58.478.242	154.536.196	-	-	-	302.570.774
Other Current Assets	1.688	113.162	2.988.066	-	-	-	3.102.916
Tangible Fixed Assets	-	-	-	-	-	50.246.034	50.246.034
Intangible Fixed Assets	-	-	-	-	-	58.225.969	58.225.969
Prepaid Expenses and Income Accruals (Long Terms)	-	-	-	149.980	-	-	149.980
Other Non-current Assets	-	-	-	-	-	2.874.378	2.874.378
Financial Assets							
Financial assets for trade	25.511.360	-	-	-	-	113.443.380	138.954.740
Total Assets	1.481.099.452	1.288.983.442	507.360.548	430.609.435	52.123.268	285.360.089	4.045.536.234
Payables From Main Operations	229.339.752	92.405.254	112.864.856	24.524.937	-	-	459.134.799
Due to Related Parties	219.062	-	1.143	-	-	-	220.205
Other Payables	-	113.263.263	-	-	-	-	113.263.263
Insurance Technical Reserves	782.446.726	795.648.895	599.614.797	112.571.224	6.700.233	-	2.296.981.875
Taxes and Other Liabilities and Provisions	-	56.865.565	-	-	-	-	56.865.565
Cost Expense Provisions	-	-	85.174.548	-	-	-	85.174.548
Prepaid Income and Expense Accruals	16.187.338	38.653.525	47.903.950	-	-	-	102.744.813
Long Term Insurance Technical Reserves	-	-	-	1.447.883	91.283.360	-	92.731.243
Provisions for Other Risks	-	-	-	-	-	7.301.102	7.301.102
Shareholders' Equity	-	-	-	-	-	788.781.331	788.781.331
Financial Payables	11.630.598	-	1.247.108	29.459.784	-	-	42.337.490
Total Liabilities and Shareholders' Equity	1.039.823.476	1.096.836.502	846.806.402	168.003.828	97.983.593	796.082.433	4.045.536.234
Liquidity Surplus / (Deficit)	441.275.976	192.146.940	(339.445.854)	262.605.607	(45.860.325)	(510.722.344)	-

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CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS AS OF SEPTEMBER 30, 2019

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

4. Insurance and Financial Risk Management (Continued)

4.2.2 Financial risk factors (Continued)

Liquidity risk table

31 December 2018

	Up to 1 month	1 - 3 month	3 months-1 year	1 -5 years	5 years and over	No maturity	Total
Cash and Cash Equivalents	486.866.689	579.752.804	886.833.419	-	-	16.115.750	1.969.568.662
Financial Assets Available for Sale	2.098.623	45.006.797	110.705.440	145.757.862	52.382.624	192.483.404	548.434.750
Investments with Risks on Policy Holders	-	-	-	1.686.241	-	-	1.686.241
Receivables From Main Operations	173.197.383	185.593.559	204.611.519	37.435.170	-	-	600.837.632
Due from Related Parties	-	-	126.885	-	-	-	126.885
Other Receivables	-	-	20.668.330	-	-	-	20.668.330
Prepaid Expenses and Income Accruals	65.078.730	53.091.248	142.960.854	-	-	-	261.130.832
Other Current Assets	218.754	-	5.416.876	-	-	-	5.635.630
Tangible Fixed Assets	-	-	-	-	-	24.329.768	24.329.768
Intangible Fixed Assets	-	-	-	-	-	55.639.894	55.639.894
Prepaid Expenses and Income Accruals (Long Terms)	-	-	-	149.980	-	-	149.980
Other Non-current Assets	-	-	-	-	-	16.972.963	16.972.963
Financial Assets							
Held-to-Maturity Financial Assets	-	-	-	9.752.674	-	-	9.752.674
Total Assets	727.460.179	863.444.408	1.371.323.323	194.781.928	52.382.624	305.541.779	3.514.934.241
Payables From Main Operations	121.540.357	74.500.013	217.355.735	5.323.197	-	-	418.719.301
Due to Related Parties	253.415	-	1.143	-	-	-	254.558
Other Payables	-	132.714.624	-	-	-	-	132.714.624
Insurance Technical Reserves	510.096.956	464.596.373	876.084.765	54.643.643	4.905.950	-	1.910.327.687
Taxes and Other Liabilities and Provisions	-	44.131.441	-	-	-	-	44.131.441
Cost Expense Provisions	-	-	40.333.473	-	-	-	40.333.473
Prepaid Income and Expense Accruals	8.353.828	16.262.600	77.102.666	-	-	-	101.719.094
Long Term Insurance Technical Reserves	-	-	-	1.473.636	82.348.570	-	83.822.206
Provisions for Other Risks	-	-	-	-	-	6.503.684	6.503.684
Other Long Term Liabilities	-	-	-	-	-	-	-
Shareholders' Equity	-	-	-	-	-	717.959.463	717.959.463
Financial Payables	58.448.710	-	-	-	-	-	58.448.710
Total Liabilities and Shareholders' Equity	698.693.266	732.205.051	1.210.877.782	61.440.476	87.254.520	724.463.147	3.514.934.241
Liquidity Surplus / (Deficit)	28.766.913	131.239.357	160.445.542	133.341.452	(34.871.896)	(418.921.368)	-

Categories of Financial Assets:

	30 September 2019		31 December 2018	
	Book Value	Fair Value	Book Value	Fair Value
Current Financial Assets				
Financial Assets Available for Sale	738.009.437	738.009.437	548.434.750	548.434.750
Held-to-maturity financial assets	47.629.402	47.629.402	9.752.674	9.752.674
Financial Investments with Risks on Policy Holders	1.723.101	1.723.101	1.686.241	1.686.241
Impairment Provision for Affiliates	-	-	-	-
Non-Current Financial Assets				
Affiliates	-	-	30.116.653	30.116.653
Impairment Provision for Affiliates	-	-	(30.116.653)	(30.116.653)
Total Financial Assets	787.361.940	787.361.940	559.873.665	559.873.665

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4. Insurance and Financial Risk Management (Continued)

4.2.2 Financial risk factors (Continued)

Fair value of financial assets

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 Company 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 Company in a current market transaction.

The fair value of financial assets shown in the following table in terms of valuation methods is shown divided into three categories. "Category 1", was organized market obtained from fair values (market data), the "Category 2" precedent that has truth according to processes and "Category 3" is the future cash flows to their present reduced according to the values that are valued financial assets represents.

	30 September 2019	Category 1	Category 2	Category 3
Financial Assets Available for Sale	738.009.437	737.579.405	-	-
Private Sector Bonds	306.755.718	306.755.718		
Eurobond	153.965.739	153.965.739		
Equity Shares	39.225.892	38.795.860		430.032
Government Bonds	99.107.348	99.107.348	-	-
Investment Funds	113.443.380	113.443.380	-	-
reverse repo	25.511.360	25.511.360		
Held-to-maturity financial assets	47.629.402	47.629.402		
Eurobond	37.399.182	37.399.182		
Government Bonds	10.230.220	10.230.220		
Financial Investments with Risks on Policy Holders	1.723.101	1.723.101	-	-
Government Bonds	1.723.101	1.723.101		
Total	787.361.940	786.931.908	0	430.032
	31 December 2018	Category 1	Category 2	Category 3
Financial Assets Available for sale			-	-
Private Sector Bonds	233.265.994	233.265.994		
Government Bonds	736	736	-	-
Investment Funds	168.805.442	168.805.442	-	-
Eurobond	122.684.814	122.684.814		
Equity Shares	23.677.764	23.247.732		430.032
Held-to-maturity financial assets				
Government Bonds	9.752.674	9.752.674		
Financial Investments with Risks on Policy Holders			-	-
Government Bonds	1.686.241	1.686.241		
Total	559.873.665	559.443.633	-	430.032

The following methods and assumptions are used in fair value estimations for financial instruments of which their fair value cannot be practically measured:

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4. Insurance and Financial Risk Management (Continued)

4.2.2 Financial risk factors (Continued)

Financial assets:

It is anticipated that fair value of the financial assets including cash and cash equivalents and other financial assets carried at cost will approximate to their book value based on their short term nature and having insignificant potential losses.

Market value is taken as a basis in the measurement of fair value of government bonds and equity shares.

Financial liabilities:

It is anticipated that fair value of monetary liabilities will approximate to their carrying value based on their short term nature.

5. Segment information

5.1 Operating segments

Information related to the operational reporting made by the Company to the chief operating decision-maker in the accordance with the “TFRS 8 - Operating Segments” is disclosed in this part.

Numerical limits in “TFRS 8 - Operating Segments” is also considered as the reporting to the chief operating decision-maker in the determination of segments and segments those constitute premium production and net technical income are determined as a separate operating segment.

The Company operates in Turkey. Since the results of operating activities abroad have very low effect on financial statements, the information about geographical has not been given.

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CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS AS OF SEPTEMBER 30, 2019

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5. Segment information (Continued)

5.1 Operating segments (Continued)

Segment results for the period ended at September 30, 2019:

	Fire	Transportation	Motor Own Damage	Motor Crafts Liability (Compulsory Traffic)	Other Accident	Engineering	Agriculture	Health	Life	Undistributed	Total
TECHNICAL INCOME	146.611.350	23.576.683	636.514.371	922.393.862	138.221.816	15.698.803	20.652.204	88.358.052	98.209	-	1.992.125.350
1- Earned Premiums (Net of Reinsurer Share)	117.451.297	18.044.992	562.114.651	721.854.836	102.740.736	14.180.051	15.048.493	64.562.500	-	-	1.615.997.556
1.1 - Premiums (Net of Reinsurer Share)	118.020.287	18.249.960	583.371.726	846.957.726	119.091.053	11.892.678	20.071.640	72.697.871	-	-	1.790.352.941
1.2- Change in Unearned Premiums Reserve (Net of Reinsurers Shares and Reserves Carried Forward) (+/-)	(568.990)	(204.968)	(38.539.015)	(125.102.890)	(3.486.773)	2.287.373	(5.023.147)	(7.494.472)	-	-	(178.132.882)
1.3- Changes in Unexpired Risks Reserve (Net of Reinsurer Share and Reserves Carried Forward) (+/-)	-	-	17.281.940	-	(12.863.544)	-	-	(640.899)	-	-	3.777.497
2- Investment Income transferred from Non-Technical Part	26.524.205	6.011.063	69.663.737	187.931.829	35.428.782	1.409.707	5.603.711	23.795.552	98.209	-	356.466.795
3- Other Technical Income (Net of Reinsurance Share)	-	-	3.587.017	-	-	-	-	-	-	-	3.587.017
4- Accrued Subrogation and Salvage Income (+)	2.635.848	(479.372)	1.148.966	12.607.197	52.298	109.045	-	-	-	-	16.073.982
TECHNICAL EXPENSES	(112.356.023)	(9.291.761)	(581.968.326)	(696.749.723)	(99.113.781)	(11.294.788)	(12.955.071)	(42.826.477)	(105.327)	-	(1.566.661.277)
1- Total Claims (Net of Reinsurer Share)	(51.047.480)	(6.448.698)	(408.396.648)	(579.274.559)	(50.567.688)	(8.649.283)	(8.590.199)	(8.475.791)	(131.081)	-	(1.121.581.427)
1.1- Claims Paid (Net of Reinsurer Share)	(52.881.518)	(1.635.266)	(390.819.828)	(420.272.947)	(23.743.142)	(8.212.028)	(4.591.677)	(6.926.511)	(123.723)	-	(909.206.640)
1.2- Changes in Outstanding Claims Reserve (Net of Reinsurer Share and Reserves Carried Forward) (+/-)	1.834.038	(4.813.432)	(17.576.820)	(159.001.612)	(26.824.546)	(437.255)	(3.998.522)	(1.549.280)	(7.358)	-	(212.374.787)
2- Changes in Bonus and Discount Reserve (Net of Reinsurer Share and Reserves Carried Forward) (+/-)	(16.106)	9.142	83.916	-	(969)	-	-	-	-	-	75.983
3- Changes in Other Technical Reserves (Net of Reinsurer Share and Reserves Carried Forward)(+/-) and Other Technical Expenses	(7.748.809)	-	(834.933)	-	(142.974)	(208.074)	-	-	-	-	(8.934.790)
4- Operating Expenses	(45.073.207)	(2.666.443)	(139.705.347)	(102.917.602)	(44.953.918)	(1.917.507)	(4.248.910)	(31.346.426)	-	-	(372.829.360)
4.1- Production Commissions (-)	(75.569.949)	(8.062.567)	(99.142.085)	(88.142.088)	(61.217.762)	(16.073.302)	(5.657.815)	(50.134.738)	-	-	(404.000.306)
4.2- Reinsurance Commissions (+)	56.960.610	7.298.019	27.181	16.968.615	28.588.623	17.871.998	1.984.478	26.596.092	-	-	156.295.616
4.3- General Administrative Expenses	(26.463.868)	(1.901.895)	(40.590.443)	(31.744.129)	(12.324.779)	(3.716.203)	(575.573)	(7.807.780)	-	-	(125.124.670)
4.4- Other Operating Expenses	-	-	-	-	-	-	-	-	-	-	-
5- Changes in Mathematical Reserves (+/-)	-	-	-	-	-	-	-	-	25.754	-	25.754
6- Other Technical Expenses (Net of Reinsurer Share)(-)	(8.470.421)	(185.762)	(33.115.314)	(14.557.562)	(3.448.233)	(519.924)	(115.962)	(3.004.260)	-	-	(63.417.438)
	34.255.327	14.284.922	54.546.045	225.644.139	39.108.035	4.404.015	7.697.133	45.531.575	(7.118)	-	425.464.073
Financial income	-	-	-	-	-	-	-	-	-	488.214.186	488.214.186
Depreciation expense	-	-	-	-	-	-	-	-	-	(24.384.538)	(24.384.538)
Provisions account, net	-	-	-	-	-	-	-	-	-	(16.489.832)	(16.489.832)
Tax expenses	-	-	-	-	-	-	-	-	-	(80.481.425)	(80.481.425)
Financial expenses	-	-	-	-	-	-	-	-	-	(494.491.199)	(494.491.199)
Other	-	-	-	-	-	-	-	-	-	(38.829.686)	(38.829.686)
Net Profit / (Loss)	34.255.327	14.284.922	54.546.045	225.644.139	39.108.035	4.404.015	7.697.133	45.531.575	(7.118)	(166.462.494)	259.001.579

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

5. Segment information (Continued)

5.1 Operating segments (Continued)

Segment results for the period ended at December 31, 2018:

	Fire	Transportation	Motor Own Damage	Land Vehicles Liability (Compulsory Traffic)	Other Accident	Engineering	Agriculture	Health	Life	Undistributed	Total
TECHNICAL INCOME	131.054.546	28.523.453	531.734.461	645.990.909	140.112.023	19.311.920	36.900	81.626.092	101.932	-	1.578.492.236
1- Earned Premiums (Net of Reinsurer Share)	108.426.221	21.552.345	504.994.722	509.421.538	110.292.933	16.530.199	36.900	65.975.979	500	-	1.337.231.337
1.1 - Premiums (Net of Reinsurer Share)	100.539.421	22.164.274	489.533.726	626.582.963	104.586.250	16.302.802	44.652	59.705.982	500	-	1.419.460.570
1.2- Change in Unearned Premiums Reserve (Net of Reinsurers Shares and Reserves Carried Forward) (+/-)	7.886.800	(627.198)	18.568.858	(117.161.425)	5.739.228	227.397	(7.752)	6.269.997	-	-	(79.104.095)
1.3- Changes in Unexpired Risks Reserve (Net of Reinsurer Share and Reserves Carried Forward) (+/-)	-	15.269	(3.107.862)	-	(32.545)	-	-	-	-	-	(3.125.138)
2- Investment Income transferred from Non-Technical Part	20.336.107	4.938.504	23.457.680	130.566.073	29.758.265	2.698.098	-	15.650.405	101.432	-	227.506.564
3- Other Technical Income (Net of Reinsurance Share)	-	-	2.939.183	-	-	-	-	-	-	-	2.939.183
4- Accrued Subrogation and Salvage Income (+)	2.292.218	2.032.604	342.876	6.003.298	60.825	83.623	-	(292)	-	-	10.815.152
TECHNICAL EXPENSES	(106.815.943)	(13.538.041)	(582.331.000)	(460.924.094)	(81.485.467)	(13.747.857)	(114.015)	(46.236.588)	(108.988)	-	(1.305.301.993)
1- Total Claims (Net of Reinsurer Share)	(50.634.545)	(8.536.543)	(432.222.745)	(389.322.413)	(34.460.345)	(9.575.615)	18.690	(5.298.054)	(240.927)	-	(930.272.497)
1.1- Claims Paid (Net of Reinsurer Share)	(34.108.152)	(4.925.920)	(407.652.293)	(243.541.054)	(16.810.084)	(7.027.346)	(111.197)	(5.076.647)	(311.257)	-	(719.563.950)
1.2- Changes in Outstanding Claims Reserve (Net of Reinsurer Share and Reserves Carried Forward) (+/-)	(16.526.393)	(3.610.623)	(24.570.452)	(145.781.359)	(17.650.261)	(2.548.269)	129.887	(221.407)	70.330	-	(210.708.547)
2- Changes in Bonus and Discount Reserve (Net of Reinsurer Share and Reserves Carried Forward) (+/-)	-	1.493	(94.663)	-	5.582	(2)	-	-	-	-	(87.590)
3- Changes in Other Technical Reserves (Net of Reinsurer Share and Reserves Carried Forward)(+/-) and Other Technical Expenses	(6.577.571)	-	(623.929)	-	(85.445)	(204.283)	-	-	-	-	(7.491.228)
4- Operating Expenses	(43.415.335)	(4.889.553)	(122.069.644)	(69.010.390)	(44.463.129)	(3.657.417)	(40.201)	(39.522.752)	-	-	(327.068.421)
4.1- Production Commissions (-)	(67.203.792)	(8.234.019)	(83.823.743)	(64.754.551)	(56.762.410)	(12.897.371)	(7.237.449)	(51.484.398)	-	-	(352.397.733)
4.2- Reinsurance Commissions (+)	48.525.794	5.226.298	47.191	15.175.172	23.458.982	12.708.214	7.700.527	21.895.969	-	-	134.738.147
4.3- General Administrative Expenses	(24.737.337)	(1.881.832)	(38.293.092)	(19.431.011)	(11.159.701)	(3.468.260)	(503.279)	(9.934.323)	-	-	(109.408.835)
4.4- Other Operating Expenses	-	-	-	-	-	-	-	-	-	-	-
5- Changes in Mathematical Reserves (+/-)	-	-	-	-	-	-	-	-	131.939	-	131.939
6- Other Technical Expenses (Net of Reinsurer Share) (-)	(6.188.492)	(113.438)	(27.320.019)	(2.591.291)	(2.482.130)	(310.540)	(92.504)	(1.415.782)	-	-	(40.514.196)
	24.238.603	14.985.412	(50.596.539)	185.066.815	58.626.556	5.564.063	(77.115)	35.389.504	(7.056)	-	273.190.243
Financial income	-	-	-	-	-	-	-	-	-	464.129.861	464.129.861
Depreciation expense	-	-	-	-	-	-	-	-	-	(15.105.137)	(15.105.137)
Provisions account, net	-	-	-	-	-	-	-	-	-	(39.275.688)	(39.275.688)
Tax expenses	-	-	-	-	-	-	-	-	-	(60.451.668)	(60.451.668)
Financial expenses	-	-	-	-	-	-	-	-	-	(464.128.781)	(464.128.781)
Other	-	-	-	-	-	-	-	-	-	6.772.270	6.772.270
Net Profit / (Loss)	24.238.603	14.985.412	(50.596.539)	185.066.815	58.626.556	5.564.063	(77.115)	35.389.504	(7.056)	(108.059.143)	165.131.100

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6. Property, plant and equipment

30 September 2019

Cost Value	Owner Occupied Properties	Vehicles	Furnitures and Fixtures and Leased Tangible Assets	Other Tangible	Advances for Tangible Assets	Total
				Assets (Including Leasehold Improvements)		
1 January	1.598.569	2.720.001	23.741.539	21.052.437	-	49.112.546
Additions	-	-	2.612.682	47.390	-	2.660.072
Disposals	-	-	(717.808)	(21.657)	-	(739.465)
30 September	1.598.569	2.720.001	25.636.414	21.078.170	-	51.033.153
<u>Accumulated Depreciation</u>			(14.906.985)	-	-	
1 January	(569.248)	(5.962)	(14.906.985)	(9.300.583)	-	(24.782.778)
Charge for the Period	(28.222)	(406.882)	(2.387.148)	(1.649.008)	-	(4.471.260)
Disposals	-	-	635.899	8.129	-	644.027
30 June	(597.470)	(412.844)	(16.658.235)	(10.941.462)	-	(28.610.011)
Net Book Value as of 30 September	1.001.099	2.307.157	8.978.179	10.136.708	-	22.423.142

30 September 2018

Cost Value	Owner Occupied Properties	Vehicles	Furnitures and Fixtures and Leased Tangible Assets	Other Tangible	Advances for Tangible Assets	Total
				Assets (Including Leasehold Improvements)		
1 January	1.598.569	-	23.957.267	21.412.252	-	46.968.088
Charge for the Period	-	-	532.887	487.572	-	1.020.459
Disposals	-	-	(321.697)	(847.387)	-	(1.169.084)
30 September	1.598.569	-	24.168.457	21.052.437	-	46.819.463
<u>Accumulated Depreciation</u>						
1 January	(537.189)	-	(12.652.946)	(7.580.602)	-	(20.770.737)
Charge for the Period	(23.985)	-	(2.251.600)	(1.765.513)	-	(4.041.098)
Disposals	-	-	301.891	618.219	-	920.110
30 September	(561.174)	-	(14.602.655)	(8.727.896)	-	(23.891.725)
Net Book Value as of 30 September	1.037.395	-	9.565.802	12.324.541	-	22.927.738

The Company has no impairment loss recognized for tangible fixed assets in the current period.

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7. Investment Properties**30 September 2019**

<u>Cost Value</u>	<u>Land</u>	<u>Buildings</u>	<u>Total</u>
1 January	-	-	-
Disposals	-	-	-
Transfers	-	170.958	170.958
September 30	-	170.958	170.958

Accumulated Depreciation

1 January	-	-	-
Charge for the Period	-	(4.309)	(4.309)
Disposals	-	-	-
30 June	-	(4.309)	(4.309)
Net Book Value as of 30 September	-	166.649	166.649

30 September 2018

<u>Cost Value</u>	<u>Land</u>	<u>Buildings</u>	<u>Total</u>
1 January	80.126	-	80.126
Disposals	(80.126)	-	(80.126)
30 September	-	-	-

Accumulated Depreciation

1 January	-	-	-
Charge for the Period	-	-	-
Disposals	-	-	-
30 June	-	-	-
Net Book Value as of 30 September	-	-	-

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8. Intangible Fixed Assets

30 September 2019

<u>Cost Value</u>	<u>Advances for Intangible</u>		
	<u>Assets (*)</u>	<u>Rights</u>	<u>Total</u>
1 January	1.949.163	111.808.560	113.757.723
Additions	1.681.857	14.715.806	16.397.663
Disposals		-260.153	-260.153
30 September	<u>3.631.020</u>	<u>126.264.213</u>	<u>129.895.233</u>
<u>Accumulated Amortization</u>			
1 January	-	(58.117.829)	(58.117.829)
Charge for the Period	-	(13.767.249)	(13.767.249)
Disposals	-	215.814	215.814
30 June	-	(71.669.264)	(71.669.264)
Net Book Value as of 30 September	3.631.020	54.594.949	58.225.969

30 September 2018

<u>Cost Value</u>	<u>Advances for Intangible</u>		
	<u>Assets (*)</u>	<u>Rights</u>	<u>Total</u>
1 January	2.600.646	87.041.349	89.641.995
Additions	900.528	9.748.812	10.649.340
30 September	<u>3.501.174</u>	<u>96.790.160</u>	<u>100.291.334</u>
<u>Accumulated Amortization</u>			
1 January	-	(43.097.276)	(43.097.276)
Charge for the Period	-	(11.064.039)	(11.064.039)
30 June	-	(54.161.315)	(54.161.315)
Net Book Value as of 30 September	3.501.174	42.628.845	46.130.019

(*) Intangible assets advances include the administrative advances for the projects implemented. Since the related assets do not create economical benefits no amortization calculated over those.

As of September 30, 2019, the Company has not recognized any impairment loss for its intangible fixed assets in the current period (December 31, 2018: None).

The Company has no goodwill amount in its financial statements.

CONVENIENCE TRANSLATION OF NOTES TO THE FINANCIAL STATEMENTS AS OF SEPTEMBER 30, 2019

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9. Investments in Affiliates

An affiliate is an entity, over which the Company has significant influence and that is neither a subsidiary nor an interest in a joint venture. Significant influence is the power to participate in the financial and operating policy decisions of the investee but is not control or joint control over those policies. As of September 30, 2018, the Company has an affiliate as Merter BV amounting to TL 30.116.653 (December 31, 2017: TL 30.116.653) with a 25% of participation. Since the Company do not have any effect on management of this affiliate the conclusive participation rate is 12,5% for each companies which own a shopping mall and an office building. Fair value of the investments in affiliates have identified by an independent real estate appraisal company and, TL 30.116.653 (December 31, 2017: TL 30.116.653) impairment has been detected and disclosed in financial statement as at September 30, 2018 (Note: 11.4).

10. Reinsurance Assets

Reinsurance assets are disclosed in Note 17.16.

11. Financial Assets

11.1 Subcategories of Financial Assets

	30 September 2019	31 December 2018
Financial Assets Available for Sale	599.054.697	379.629.308
Held-to-maturity financial assets	47.629.402	9.752.674
Financial Investments with Risks on Policy	1.723.101	1.686.241
Provision for Impairment	-	-
Financial assets for trade	138.954.740	168.805.442
Total	787.361.940	559.873.665

Financial Assets Available for Sale

	30 September 2019			31 December 2018		
	Cost Value	Fair Value	Book Value	Cost Value	Fair Value	Book Value
Private Sector Bond	292.066.753	306.755.719	306.755.719	218.835.732	233.265.994	233.265.994
Investment Fund	-	-	-	-	-	-
Eurobond	154.353.102	153.965.739	153.965.739	134.782.226	122.684.814	122.684.814
Equity Shares (Listed)	37.937.621	38.795.860	38.795.860	24.215.782	23.247.732	23.247.732
Equity Shares (Unlisted)	430.032	-	430.032	430.032	-	430.032
Government Bonds	89.389.791	99.107.348	99.107.348	736	736	736
Total	574.177.299	598.624.666	599.054.698	378.264.508	379.199.276	379.629.308

	30 September 2019			31 December 2018		
	Cost Value	Fair Value	Book Value	Cost Value	Fair Value	Book Value
Held-to-maturity financial assets	46.171.093	47.629.402	47.629.402	9.194.956	9.752.674	9.752.674

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11. Financial Assets (Continued)

11.1 Subcategories of Financial Assets (Continued)

Financial Investments with Risks on Policy Holders

	30 September 2019			31 December 2018		
	Cost Value	Fair Value	Book Value	Cost Value	Fair Value	Book Value
Government Bonds	1.647.665	1.723.101	1.723.101	1.647.665	1.686.241	1.686.241

Equity shares under financial assets available-for-sale is as below:

30 September 2019

Equity Shares	Participation	Cost Value TL	Fair Value TL	Book Value TL
	Rate %			
Borsa İstanbul Listed		37.937.621	38.795.860	38.795.860
Tarsim Tarım Sigortaları Havuz İşletmesi A.Ş.	4,17	430.032	-	430.032
Unlisted		430.032	-	430.032
Total		38.367.653	38.795.860	39.225.892

31 December 2018

Equity Shares	Participation	Cost Value TL	Fair Value TL	Book Value TL
	Rate %			
Borsa İstanbul Listed		24.215.782	23.247.732	23.247.732
Tarsim Tarım Sigortaları Havuz İşletmesi A.Ş.	4,17	430.032	-	430.032
Unlisted		430.032	-	430.032
Total		24.645.814	23.247.732	23.677.764

The Company does not have assets held for trading as of September 30, 2019 and December 31, 2018.

As of September 30, 2019, and December 31, 2018, the blockage on financial assets in favour of Undersecretariat of Treasury has been disclosed in Note 17.1.

11.2 Securities other than equity shares issued in the current period:

None (December 31, 2018: None).

11.3 Securities issued representing the amortized borrowing in the current period:

None (December 31, 2018: None).

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11. Financial Assets (Continued)

11.4 Fair value of securities and long-term financial assets that are carried at cost in the balance sheet and cost of securities and long-term financial assets that are carried at fair value in the balance sheet

Cost, fair value and book values of marketable securities are presented in Note 11.1.

Financial assets consist of unlisted assets, and cost and book value of financial assets are presented as below:

	30 September 2019			31 December 2018		
	Participation Rate %	Cost Value TL	Book Value TL	Participation Rate %	Cost Value TL	Book Value TL
Merter BV	0	0	0	25	30.116.653	30.116.653
Impairment (-)					-	(30.116.653)
Affiliates (Net)			-		30.116.653	-

11.5 Marketable securities issued by the shareholders, affiliates and subsidiaries of the Company classified under marketable securities and associates and their issuers:

None (December 31, 2018: None).

11.6 Value increases of financial assets in the last three years

	30 September 2019	31 December 2018	31 December 2017
Financial Assets Available for Sale	5.225.529	(13.298.346)	(18.088)

Value increases and decreases (net-off deferred tax) reflect the difference between the book value and cost value of the financial assets at period end.

11.7 Financial Instruments

- Information that enables the financial statement users to evaluate the financial position and performance of the Company is disclosed in Note 4.1.
- Information on the book value of the financial assets is disclosed in Note 11.1.
- Comparison of the fair value and book value of financial assets is disclosed in Note 11.1.
- Financial assets overdue or impaired are presented in Note 11.1.

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11. Financial Assets (Continued)

11.8. Financial Instruments

Information related to hedge accounting has been disclosed in Note 34.5.

11.9 Effects of Exchange Rate Differences

Exchange rate differences arising from the payments of monetary items or different conversion rates used in the current period or at initial recognition are recognized in profit or loss.

12. Receivables and Payables

12.1 Details of the Company's receivables

	<u>30 September 2019</u>	<u>31 December 2018</u>
Receivables from insurance operations		
Receivables from agencies	436.385.081	396.286.545
Bank guaranteed credit card receivables more than three months	123.299.931	147.593.612
Receivables from reinsurance companies	35.201.899	28.935.600
Receivables for salvage and claim recovery - net (Note 2.1.1)	26.704.226	29.909.283
Other receivables	447.022	340.483
Receivables from insurance operations	621.591.137	602.725.040
Cash deposited for insurance and reinsurance companies	30.954	30.954
Receivables from insurance and reinsurance companies	30.954	30.954
Claim recovery receivables under legal follow-up	89.692.805	83.717.544
Doubtful receivables from main operations	46.473.247	32.693.245
Total Doubtful Receivables	136.166.052	116.410.789
Receivables from main operations	758.235.165	719.507.266
Provision for due from insurance operations (-) (*)	(29.459.724)	(11.935.533)
Provision for doubtful receivables from main operations (-) (**)	(23.671.502)	(23.016.557)
Provision for net claim recovery receivables under legal follow-up (-) (**)	(89.692.805)	(83.717.544)
Total provision amount for doubtful and undue receivables	(142.824.031)	(118.669.634)
Receivables from main operations - net	615.411.134	600.837.632

(*) In balance sheet disclosed under provision for receivables from insurance operations.

(**) In balance sheet disclosed under provision for receivables from main operations.

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AS OF SEPTEMBER 30, 2019**

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12. Receivables and Payables (Continued)

12.1 Details of the Company’s Receivables (Continued)

Aging of receivables from insurance operations is as follows:

	30 September 2019	31 December 2018
0-90 days	27.213.250	8.190.917
90+	49.410.923	36.047.030
Not due receivables	545.444.941	558.858.530
Total	622.069.113	603.096.477

The details of guarantees for the Company’s receivables are presented below:

Type of Guarantee	30 September 2019		31 December 2018	
	Receivables	Doubtful Receivables	Receivables	Doubtful Receivables
Real Estate Pledges	54.555.791	1.981.952	60.207.941	2.049.952
Letters of Guarantee	43.756.389		42.311.128	-
Other	2.117.860	-	1.061.760	-
Government Bonds and Equity Shares	403.292	7.500	376.202	-
Total	100.833.332	1.989.452	103.957.030	2.049.952

The Company books provision for 100% of doubtful receivables discluding guarantess. The movement table of provision for doubtful receivables under legal follow-up is presented below:

	2019	2018
Opening Balance, 1 January	(106.734.101)	(95.011.803)
Charge for the Period	(9.333.328)	(17.012.726)
Collections	2.703.122	5.290.428
Closing Balance, 30 September	(113.364.307)	(106.734.101)

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12. Receivables and Payables (Continued)

12.2 Receivable-payable relationship with shareholders, affiliates and subsidiaries of the Company

Due to shareholders in balance sheet includes dividends which have paid previous years but not collected by shareholders. As of September 30, 2019, the Company has liabilities amounting to TL 1.143 to shareholders. (December 31, 2018: TL 1.143)

12.3 Total of pledges and other guarantees received for receivables amount

Total amount of pledges and other guarantees received for receivables amounts to TL 100.833.332 as at September 30, 2019 (December 31, 2018: TL 103.957.030).

12.4 Details of the Company’s foreign currency denominated receivables without exchange rate guarantees are presented below:

30 September 2019

Banks (Foreign Currency)	Amount in Foreign Currency	Exchange Rate	Amount (TL)
USD	8.896.701	5,6591	50.347.321
EUR	1.135.840	6,1836	7.023.580
GBP	32.597	6,9487	226.507
CHF	324.985	5,6857	1.847.767
Other	943	0,0523	49
Total			59.445.224
Stocks and Bonds	Amount in Foreign Currency	Exchange Rate	Amount (TL)
USD	27.206.754	5,6591	153.965.739
Total			153.965.739
Receivables from Insurance Operations	Amount in Foreign Currency	Exchange Rate	Amount (TL)
USD	32.478.587	5,6591	183.799.572
EUR	15.967.202	6,1836	98.734.790
GBP	161.569	6,9487	1.122.696
Total			283.657.058
Outstanding Claims Reserve	Amount in Foreign Currency	Exchange Rate	Amount (TL)
USD	(7.830.000)	5,6591	(44.310.753)
EUR	(1.377.223)	6,1836	(8.516.196)
Other			6
Total			(52.826.943)
Payables from Insurance Operations	Amount in Foreign Currency	Exchange Rate	Amount (TL)
USD	(39.005.022)	5,6591	(220.733.320)
EUR	(8.654.476)	6,1836	(53.515.821)
Other			(3.026.241)
Total			(277.275.382)
Net Foreign Currency Position			161.543.813

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12. Receivables and Payables (Continued)

12.5 Details of the Company’s foreign currency denominated receivables without exchange rate guarantees are presented below: (Continued)

31 December 2018

Banks (Foreign Currency)	Amount in Foreign Currency	Exchange Rate	Amount (TL)
USD	5.165.611	5,2609	27.175.763
EUR	2.029.314	6,0280	12.232.705
GBP	55.032	6,6528	366.117
CHF	157.666	5,3352	841.180
Total			40.615.765
Stocks and Bonds	Amount in Foreign Currency	Exchange Rate	Amount (TL)
USD	23.320.119	5,2609	122.684.814
Total			0
Receivables from Insurance Operations	Amount in Foreign Currency	Exchange Rate	Amount (TL)
USD	28.691.649	5,2609	150.943.896
EUR	17.295.218	6,0280	104.255.574
GBP	107.134	6,6528	712.741
CHF	8.052	5,3352	42.959
Other			
Total			255.955.170
Outstanding Claims Reserve	Amount in Foreign Currency	Exchange Rate	Amount (TL)
USD	(6.818.960)	5,2609	(35.873.867)
EUR	(1.109.743)	6,0280	(6.689.531)
Other			(4.501)
Total			(42.567.898)
Payables from Insurance Operations	Amount in Foreign Currency	Exchange Rate	Amount (TL)
USD	(35.271.589)	5,2609	(185.560.303)
EUR	(7.373.885)	6,0280	(44.449.779)
Other			(2.193.297)
Total			(232.203.378)
Net Foreign Currency Position			144.643.852

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13. Derivative Financial Instruments

During the period between January 1 – September 30, 2018, total income resulting from short-term swap contracts’ market valuation has been accounted under “Income from derivatives” in the income statement in amounting to TL 147.502.951 (July 1 – September 30, 2019: TL 86.965.978) (January 1 – September 30, 2018: TL 15.510.853)

14. Cash and Cash Equivalents

	30 September 2019	31 December 2018
Cash at Banks	1.607.739.176	1.485.633.722
Time Deposit	1.586.394.739	1.469.517.972
Demand Deposit	21.344.437	16.115.750
Bank Guaranteed Credit Card Receivables with Maturities less than three months	602.927.403	483.934.940
Total	2.210.666.579	1.969.568.662
Interest Accrual on Cash and Cash Equivalents (-)	(49.785.346)	(11.676.242)
Blocked Deposits (*)	(237.255.779)	(194.431.281)
Cash Flow Based Grand Total	1.923.625.454	1.763.461.139

(*)The blockage on cash and cash equivalents has been disclosed in Note 17.1.

As of September 30, 2019 and December 31, 2018, interest rate of time deposits are as follows:

	30 September 2019	31 December 2018
	Annual Interest Rate (%)	Annual Interest Rate (%)
TL	16,26 – 23,25	18,00 – 30,00
USD	2,50 – 2,9	1,15 – 3,75
EUR	0,5 - 1	1,4 – 2,85

As of September 30, 2019 maturity of TL deposits are changed between October 1, 2019 to February 17, 2020, foreign exchange are changed between October 1, 2019 to November 5, 2019

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14. Cash and Cash Equivalents (Continued)

As of December 31, 2018 maturity of TL deposits are changed between January 2, 2019 to November 22, 2019.

As of September 30, 2019, there are no reverse repo transaction accounted for as cash and cash equivalents (31 December 2018: none)

15. Share Capital

15.1 Transactions between the Company and its shareholders, showing each distribution made to the shareholders separately

The Company’s shareholders and its shareholders’ equity structure as of September 30, 2019 and December 31, 2018 are presented in Note 2.13.

The details of the transactions between the Company and its shareholders and the related balances as of the end of the period are presented in “Related Parties” note.

The account of Profit on Sale to be Transferred to Capital has consisted of the amounts arising from the gain on sale of fixed assets transferred to the equity.

15.2 Reconciliation of carrying values of each capital account and each reserve as of the beginning and end of the period showing each change separately

Presented in the statement of changes in equity.

Special Funds (Reserves)	30 September 2019	31 December 2018
Actuarial (loss)/gain	4.640.829	3.602.019
Total	4.640.829	3.602.019

Previous Year’s Profits/Losses

In addition to the profit to be distributed by the company according to the financial statements reflecting the operating results for 2018, it was decided at The Ordinary General Assembly meeting held on 4 March 2019 that TL 4.387.874 was to be met from the previous year’s profits.

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15. Share Capital (Continued)

15.3 For each class of share capital

15.3.1 The explanation about the number of capital shares

The Company’s issued capital share is composed of 30.600.000.000 shares having a nominal amount of TL 0,01 each. These shares are presented by Class 10 shares (December 31, 2018: 30.600.000.000 shares with a nominal amount of TL 0,01each).

15.3.2 The explanation about the number of issued and fully paid shares and issued but not fully paid shares

None (December 31, 2018: None).

15.3.3 Nominal value of an equity share or equity shares without having nominal value

Nominal value of equity shares is TL 0,01 per share (December 31, 2018: TL 0,01 per share).

15.3.4 Reconciliation of the number of the equity shares at the beginning and ending of the period

	Number of Shares	
	30 September 2019	31 December 2018
Beginning of the Period, 1 January	30.600.000.000	30.600.000.000
Issued in the Current Period	-	-
End of the Period, 30 September	30.600.000.000	30.600.000.000

15.3.5 Rights, privileges and limitations on dividend payments and repayment of share capital

In accordance with Article 61 of the Company’s Articles of Association, corporate tax is deducted from the net profit which is determined and calculated based on the issued balance sheet. 5% of statutory reserve is allocated over the remaining amount and subsequent to this allocation, at minimum, 1. dividend amount that is determined by the CMB is also allocated over the final remaining amount.

The Company’s capital does not include any preferred shares.

Based on the guidelines and principals issued by the Capital Markets Board (the Board) dated January 27, 2010 for the distribution of dividends from the profit generated from operating activities in 2010, concerning public entities, the shares of which are quoted in public equity markets, it has been agreed upon not to set a mandatory minimum dividend payment quota (December 31, 2016: 20%). Furthermore, it has been agreed upon to let public entities perform dividend distributions as stated within the “Communique Concerning Principal Matters on Dividend Advances Distributed by Public Entities Under the Regulation of the Capital Markets Law” (Serial: IV, No: 27), as stated within the principal agreement of the companies and as stated within the policies on dividend distribution that have been shared with the public.

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15. Share Capital (Continued)**15.3.6 Equity shares held by the Company, its affiliates or its subsidiaries**

None (December 31, 2018: None).

15.3.7 Equity shares held for future sale for forward transactions and contracts

None (December 31, 2018: None).

15.4 Share based payments

None (December 31, 2018: None).

15.5 Subsequent events

Disclosed in note 46.

16. Other Provisions and Capital Component of Discretionary Participation**16.1 Each income and expense item and their total amounts accrued under shareholders’ equity in the current period in accordance with other standards and interpretations**

	<u>30 September 2019</u>	<u>31 December 2018</u>
Valuation difference of financial assets available for sale	5.225.529	(13.298.346)
Deferred tax effect	(1.045.106)	2.659.669
Total	4.180.423	(10.638.677)

In accordance with changes regarding “TAS 19 – Employee Benefits” effective as of January 1, 2013, actuarial loss amounting to TL 5.801.036 (Deferred tax effect: TL 1.160.207) resulting from retirement pay liability calculation has been accounted to “Other Reserves and Retained Earnings” under equity.

As of September 30, 2018, effect of hedge accounting amount of TL 47.936.941 (Deferred tax effect: TL 9.587.388) has been recognized “Special Funds (Reserves)” account item under equity.

16.2 Net exchange differences classified separately as an equity item and reconciliation of exchange differences at the beginning and end of the period

None (December 31, 2018: None).

16.3 Hedging for forecasted transactions and net investment hedging

None (December 31, 2018: None).

16.4 Hedging against financial risks

Information related to hedge accounting has been disclosed in Note: 34.5

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16. Other Provisions and Capital Component of Discretionary Participation(Continued)

16.5 Gains and losses from available for sale financial assets recognized directly in equity for in the current period and amounts recognized in the current profit or loss taken from shareholders' equity

	2019 Increase / (Decrease)	2018 Increase / (Decrease)
Beginning of the period, 1 January	(10.638.677)	(14.470)
Increase / decrease in value recognized under the shareholders' equity in the current period	14.819.100	(10.624.207)
End of the period	4.180.423	(10.638.677)

16.6 Income and loss related to affiliates recognized directly in equity in the current period

Disclosed in note 34.5

16.7 Revaluation increases in tangible fixed assets

None (December 31, 2018: None).

16.8 Current and deferred tax in relation to debit and credit items directly charged in equity

None (December 31, 2018: None).

17. Insurance Liabilities and Reinsurance Assets

17.1 Guarantees to be provided for life and non-life insurance branches and guarantees provided for life and non-life insurances based on assets

The Company's guarantees to be provided for life and non-life insurance branches and guarantees provided for life and non-life insurances based on assets are below:

Branch	30 September 2019		31 December 2018	
	Amount to be Provided TL	Current Blockage TL	Amount to be Provided TL	Current Blockage TL
Life	1.602.590	1.723.101	1.609.847	1.686.241
Government Bonds		1.723.101		1.686.241
Non-Life	195.062.313	287.255.779	192.033.411	194.431.281
Time Deposit				144.431.282
credit card receivables		287.255.779		50.000.000
Total	196.664.903	288.978.880	193.643.258	196.117.523

* As of September 30, 2018, the required guarantee amount has calculated based on capital requirements in December 31, 2016.

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17. Insurance Liabilities and Reinsurance Assets (Continued)

17.2 Number of life insurance policies, additions, disposals in the current period, and current life insureds and their mathematical reserves

	2019		2018	
	Unit	Mathematical reserves TL	Unit	Mathematical reserves TL
Beginning of the period, 1 January	182	1.473.636	195	1.609.127
Participations in the current period	-		-	-
Leavings in the current period	(9)	(25.753)	(11)	(131.939)
End of period,	173	1.447.883	184	1.477.188

Mathematical reserves amounting to TL 1.447.883 (December 31, 2018: TL 1.326.272) and Reserves for the policies, investment risk of which belongs to life insurance polich holders amounting to TL 144.788 (December 31, 2018: TL 147.364) and cancelled polich numbers together with their mathematical reserves are included in the table above.

Financial assets classified as Financial Assets Ready For Sale under Financial Investments at Policyholder’s Risk are valued with current value as explained in note 11; as of September 30, 2019, there is no difference in the value accounted in Life Mathematical Reserve account discounted with current value (December 31, 2018: None).

17.3 Insurance guarantees given to non life insurances based on insurance branches

Branch	30 September 2019	31 December 2018
Motor Crafts Liability	26.602.075.343.066	21.961.041.262.497
Fire and Natural Disaster	1.066.734.001.711	832.598.157.479
General Losses	476.191.626.539	359.358.532.312
Transportation	230.977.347.514	216.885.290.780
General Liability	213.653.923.072	142.501.692.083
Motor Own Damage	111.898.619.680	102.212.029.578
Financial Losses	125.770.836.894	92.068.698.334
Accident	41.201.057.689	46.932.546.318
Air Crafts Liability	66.233.732.158	48.419.381.743
Health	16.958.455.195.619	12.956.617.624
Legal Protection	10.028.841.476	11.098.243.938
Air Crafts	6.712.560.408	5.005.285.800
Credit	1.082.651.722	1.174.412.910
Fidelity Guarantee	1.606.182.913	1.102.914.995
Total	45.912.621.920.460	23.833.355.066.391

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17. Insurance Liabilities and Reinsurance Assets (Continued)

17.4 Pension investment funds established by the Company and their unit prices

None (December 31, 2018: None).

17.5 Number and amount of participation certificates in portfolio and circulation

None (December 31, 2018: None).

17.6 Number of portfolio amounts of additions, disposals, reversals, and current individual and group pension participants

None (December 31, 2018: None).

17.7 Valuation methods used in profit share calculation for life insurances with profit shares

None (December 31, 2018: None).

17.8 Number of the additions and their group or individual gross and net share participations in the current period

None (December 31, 2018: None).

17.9 Number of additions from the other companies and their group or individual gross and net share participations in the current period

None (December 31, 2018: None).

17.10 Number of transfers from the Company’s life portfolio to individual pension portfolio and their group or individual gross and net share participations

None (December 31, 2018: None).

17.11 Number of transfers from the Company’s individual pension portfolio to other company or not and together their personal and corporate allocation and gross and net share participations

None (December 31, 2018: None).

17.12 Number of additions of life insurances and their group or individual gross and net mathematical reserves

None (December 31, 2018: None).

17.13 Number of disposals of life insurances and their group or individual gross and net mathematical reserves

All of disposals of life insurances in current period are individual and units and amounts are represented in Note 17.2.

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17. Insurance Liabilities and Reinsurance Assets (Continued)

17.14 Profit share distribution rate of life insurees in the current period

In the current period, profit share distribution rate of life insurees are calculated as below:

	1 January- 30 September 2019 Profit Share Distribution Rate (%)	1 January- 31 December 2018 Profit Share Distribution Rate (%)
TL (Life Insurance)	9,00	9,00

17.15 Explanation of information that describes amounts arose from insurance agreements

None (December 31, 2018: None).

17.16 Assets, liabilities, income, expense and cash flows from insurance contacts recognized when the insurer is a ceding company:

Reinsurance Assets

	30 September 2019	31 December 2018
Reinsurance Share of Outstanding Claims Reserve (Note 4.1.2.2)	1.892.992.431	1.246.875.833
Reinsurance Share of Unearned Premiums Reserve (Note 20)	853.479.905	729.548.075
Reinsurance Share of Equalization Reserve (Note 20)	142.833.344	106.980.739
Receivables from Reinsurance Companies (Note 12.1)	35.201.899	28.935.600
Reinsurance Share of Unexpired Risks Reserve (Note 20)	123.729.942	106.920.200
Reinsurance Share of bonuses and rebates reserve (Note 20)	2.908.720	
Cash Deposited For Insurance & Reinsurance Companies (Note 12.1)	30.954	30.954
Total	3.051.177.195	2.219.291.401

Reinsurance Liabilities

	30 September 2019	31 December 2018
Payables to Insurance and Reinsurance Companies (Note 19.1)	459.134.799	418.719.301
Deferred Commissions Income (Note 19.1)	102.496.501	101.508.921
Total	561.631.300	520.228.222

Income / Expense on Reinsurance Agreements

	1 January- 30 September 2019	1 July- 30 September 2019	1 January- 30 September 2018	1 July- 30 September 2018
Reinsurance Share of Outstanding Claims Reserve	646.116.599	439.607.574	509.482.608	319.178.412
Reinsurance Share of Unearned Premiums Reserve (Note 20)	123.931.829	(96.088.335)	98.572.263	(66.078.309)
Reinsurance Share of Claims Paid	365.071.802	105.259.991	279.530.936	92.380.789
Commissions Received (Note 32)	156.295.616	56.132.843	134.738.147	49.321.820
Reinsurance Share of bonuses and rebates reserve (Note 20)	(59.156.800)	1.215.519	69.578.658	16.519.541
Reinsurance Share of Unexpired Risks Reserve (Note 20)	16.809.742	(48.100.214)	(12.120.641)	(22.115.734)
Premiums Ceded to Reinsurers (-)	(1.327.229.536)	(331.673.888)	(1.027.038.726)	(272.340.396)
Total	(78.160.748)	126.353.490	52.743.245	116.866.123

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17. Insurance Liabilities and Reinsurance Assets (Continued)

17.16 Assets, liabilities, income, expense and cash flows from insurance contacts recognized when the insurer is a ceding company: (Continued)

Branch	30 September 2019			30 September 2018		
	Premiums Ceded (*)	Reinsurance Share of Technical Reserves (**)	Reinsurance Share of Claims Paid	Premiums Ceded	Reinsurance Share of Technical Reserves	Reinsurance Share of Claims Paid
Fire and Natural Disaster	(439.432.530)	428.749.662	46.420.883	(321.595.015)	237.207.684	45.882.612
Health	(197.778.653)	34.309.814	137.069.587	(149.560.916)	12.486.191	101.026.126
General Losses	(152.323.124)	(70.199.465)	59.222.636	(160.224.972)	219.974.875	37.528.998
Motor Crafts Liability	(221.315.724)	31.379.163	63.761.979	(199.751.151)	49.602.898	37.802.267
General Liability	(117.126.809)	180.340.298	15.645.405	(85.538.600)	74.332.610	10.180.418
Financial Losses	(71.654.407)	98.393.397	19.221.755	(39.450.436)	34.839.293	64
Transportation	(36.988.397)	12.716.428	12.795.904	(26.483.741)	17.800.795	8.813.522
Accident	(4.770.712)	(6.132.243)	4.702.954	(7.967.170)	(3.120.525)	4.275.858
Fidelity Guarantee	(3.046.219)	1.068.348	396.333	(2.490.133)	13.752.423	13.944.884
Air Crafts Liability	(22.446.438)	(45.157.965)	-	(17.528.843)	11.964.732	831.036
Air Crafts	(39.937.183)	22.058.971	2.756.836	(4.224.893)	(4.347.304)	2.182.038
Water Crafts	(14.458.675)	38.426.539	2.527.612	(6.437.858)	3.271.251	249.385
Credit	(2.378.618)	(410.902)	549.918	(2.216.597)	310.709	355.698
Motor Own Damage	(3.572.047)	2.159.325	-	(3.568.401)	(2.562.744)	16.458.030
Total	(1.327.229.536)	727.701.370	365.071.802	(1.027.038.726)	665.512.888	279.530.936

The Company, as a ceding company, defers its commission income obtained from reinsurance agreements.

17.17. Comparison of incurred claims with past estimations

Disclosed in Note 4.1.2.3.

17.18. Effects of changes in the assumptions used in the measurement of insurance assets and liabilities, showing the effects of each change that has significant effect on the financial statements separately

Disclosed in note 4.1.2.4.

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17. Insurance Liabilities and Reinsurance Assets (Continued)

17.19 Reconciliation of insurance payables, reinsurance assets and changes in deferred acquisition costs, if any

	2019	
	Insurance Payables	Reinsurance Assets
Beginning of the period, 1 January	520.228.222	2.219.291.401
Net change for the year	41.403.078	831.885.794
End of the period, 30 September	561.631.300	3.051.177.195

	2018	
	Insurance Payables	Reinsurance Assets
Beginning of the period, 1 January	386.475.544	1.530.033.769
Net change for the year	184.582.882	387.658.220
End of the period, 30 September	571.058.426	1.917.691.989

18. Investment Contract Liabilities

Disclosed in Note 17.3.

19. Trade and Other Payables, Deferred Income

19.1 Sub-classifications of presented items in line with the Company’s operations

	30 September 2019	31 December 2018
Payables to insurance and reinsurance companies (Note 17.16)	459.134.799	418.719.301
Payables from Insurance Operations	459.134.799	418.719.301
Payables to Turkish Catastrophe Insurance Pool	19.907.005	18.902.758
Payables to suppliers	13.245.224	26.701.130
Payables to contracted enterprises	41.908.685	54.098.804
Turkish Catastrophe Insurance Pool Payables to agencies	1.143.664	937.702
Other	1.065.302	3.961.451
Other Payables	77.269.880	104.601.845
Payables to SSI regarding medical expenses	34.352.890	28.112.544
Deferred commission income (Note 17.16)	102.496.501	101.508.921
Expense accruals	85.174.548	40.333.473
Other	248.312	210.173
Deferred Income and Expense Accruals	187.919.361	142.052.567
Total Short Term Liabilities	758.676.930	693.486.257
Total Trade and Other Payables, Deferred Income	758.676.930	693.486.257

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19. Trade and Other Payables, Deferred Income (Continued)

19.2 Related Parties

Details related with related party balances and transactions for the current financial period are disclosed in Note 45.

20. Payables

Insurance Technical Reserves	30 September 2019	31 December 2018
Unearned Premiums Reserve - Net (*)	1.218.308.119	1.040.175.238
Outstanding Claims Reserve - Net (Note 4.1.2.2)	1.061.777.124	849.402.337
Equalization Reserve - Net	91.283.360	82.348.570
Mathematical Reserves - Net	1.447.883	1.473.636
Unexpired Risks Reserve - Net	16.875.560	20.653.057
Bonuses and rebates reserve - Net	21.072	97.055
Total	2.389.713.118	1.994.149.893

(*) While calculating the income statement effect of the provisions for unearned premiums, TL 3.722.813, the deferral effect of the premiums transferred to assistance companies, which is included in operating expenses, has been netted off (December 31, 2018: TL 501.585).

As disclosed in note 2.15, the reinsurers' share of unearned premiums includes SSI share as of September 30, 2019 which is TL 66.451.948 (December 31, 2018: TL 35.362.066).

The movement of technical reserves are as follows:

Unearned Premium Reserve:

	30 September 2019			30 September 2018		
	Gross	Reinsurance Share	Net	Gross	Reinsurance Share	Net
Beginning of the period, 1 January	1.769.723.314	(729.548.076)	1.040.175.238	1.471.777.824	(587.846.797)	883.931.027
Net change	302.064.710	(123.931.829)	178.132.881	177.676.358	(98.572.263)	79.104.095
End of the period, 30 September	2.071.788.024	(853.479.905)	1.218.308.119	1.649.454.182	(686.419.060)	963.035.122

Unexpired Risk Reserve:

	30 September 2019			30 September 2018		
	Gross	Reinsurance Share	Net	Gross	Reinsurance Share	Net
Beginning of the period, 1 January	127.573.257	(106.920.200)	20.653.057	15.546.916	(15.070.795)	476.121
Net change	13.032.245	(16.809.742)	(3.777.497)	(8.995.504)	12.120.641	3.125.137
End of the period, 30 September	140.605.502	(123.729.942)	16.875.560	6.551.412	(2.950.154)	3.601.258

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20. Payables (Continued)

Equalization Reserve:

	30 September 2019			30 September 2018		
	Gross	Reinsurance Share	Net	Gross	Reinsurance Share	Net
Beginning of the period, 1 January	189.329.309	(106.980.739)	82.348.570	144.099.369	(73.534.993)	70.564.376
Net change	44.787.394	(35.852.604)	8.934.790	30.291.671	(22.800.443)	7.491.228
End of the period, 30 September	234.116.703	(142.833.344)	91.283.360	174.391.040	(96.335.436)	78.055.604

Provision for bonus and discount

	30 September 2019			30 September 2018		
	Gross	Reinsurance Share	Net	Gross	Reinsurance Share	Net
Beginning of the period, 1 January	62.162.575	(62.065.520)	97.055	539.637	(532.570)	7.067
Net change	(59.232.783)	59.156.800	(75.983)	69.666.248	(69.578.658)	87.590
End of the period, 30 September	2.929.792	(2.908.720)	21.072	70.205.885	(70.111.228)	94.657

Outstanding Claims Reserve:

The movement of Outstanding Claims Reserve are presented in Note 4.1.2.3.

21. Deferred Income Tax

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

Tax rate is applied as 20% for the calculation of deferred tax asset and liabilities. The details of deferred tax are presented in Note 35.

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22. Retirement and Welfare Liabilities

Provisional Article 23 of the Banking Act No: 5411 requires the transfer of pension funds, which are established for employees of financial institutions, insurance and reinsurance companies under Social Security Act, to Social Security Institution (“SSI”) as of the effective date of the Act within 3 years and principles and procedures of fund transfer are also prescribed in accordance with the Council of Ministers’ order no: 2006/11345 issued on 30 November 2006. However, transfer requirement in the related Act was annulled based on the application made by the Turkish President on November 2, 2005 in accordance with the order of the Constitutional Court (no: E.2005/39, K.2007/33) issued on March 22, 2007 as effective from the date of publishment in the Official Gazette no: 26479 on March 31, 2007.

On the other hand, the Act No: 5754 “Amendments in Social Securities and General Health Insurance Acts Specific Laws and Related Requirements” published in the Official Gazette No: 26870 on May 8, 2008, requires the transfer of participants or beneficiaries of pension funds to SSI as of the effective date of the Act within 3 years and prescribes the extension period of the transfer as maximum of two years upon the order of Council of Ministers.

The Act prescribes that, as of the transfer date, present value of fund liabilities should be measured by considering the fund income and expense based on the insurance branches presented in the related act using 9,8% of technical interest rate in the actuarial calculation. The Act also specifies that the uncovered other rights and compensations of participants or beneficiaries of pension funds should be covered by institutions that made the fund transfers.

Aksigorta A.Ş. is a member of Akbank T.A.Ş Pension Fund (Akbank T.A.Ş Tekaüt Sandığı). At each period-end, the Company pays its liability calculated for its share to the pension fund. As the result of the actuarial calculations made in relation to the Pension Fund of Akbank T.A.Ş. established in accordance with Article 20 of the Social Securities Act No: 506, the Company has no deficits by the end of the current period and no payments have been made in relation to any deficit amount by the Company. Fund assets are adequate in covering all the funds liabilities; therefore, the Company management anticipates no liabilities to be assumed in relation to the above-mentioned matter.

Retirement Pay Provisions:

Under the terms of Turkish Labor Law, the Company is required to pay employment termination benefits to each employee who has qualified for such payment. Also, employees are entitled to retirement pay provisions subsequent to the completion of their retirement period by gaining a right to receive retirement payments in accordance with the amended Article 60 of the applicable Social Insurance Law No: 506 and the related Decrees No: 2422 and 4447 issued on 6 March 1981 and August 25, 1999, respectively. Some transitional provisions related to pre-retirement service term was excluded from the law since the related law was amended as of May 23, 2002.

Employee termination benefits provisions are legally not a subject of funding. The provision has been calculated by estimating the present value of the future probable obligation of the Company arising from the retirement of employees. TAS 19 (“Employee Benefits”) requires actuarial valuation methods to be developed to estimate the enterprise’s obligation under defined benefit plans. Accordingly, the following actuarial assumptions were used in the calculation of the total liability:

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22. Retirement and Welfare Liabilities

The principal assumption is that the maximum liability for each year of service will increase parallel with inflation. Thus, the discount rate applied represents the expected real rate after adjusting for the anticipated effects of future inflation. Consequently, in the accompanying financial statements as at December 31, 2017 and December 31, 2017, the provision has been calculated by estimating the present value of the future probable obligation of the Company arising from the retirement of the employees. As of September 30, 2018, the provisions at the respective balance sheet dates have been calculated assuming an annual inflation rate of 24% (December 31, 2017: %11,92) and a discount rate of 4% (December 31, 2017: 3%), resulting in a real interest rate of 20% (December 31, 2016: 10,9%). The anticipated rate of forfeitures is considered and estimated rate of the Company’s retirements pay is also taken into account.

However, during this estimation, the employee termination benefits mentioned in subparagraph 5 of paragraph 1 of article 14 of the Labor Law numbered 1475 to be made in accordance with other conditions excluding the ages stipulated in clauses (a) and (b) of subparagraph A of paragraph one of article 60 of the Law numbered 506 or due to termination of employees on their own will after having completed the insurance period required for retirement pension (15 years) and the number of premium payment days (3600 days) have been excluded from the payments to be incurred by the Company.

In accordance with changes regarding “TAS 19 – Employee Benefits” effective as of January 1, 2013, actuarial loss amounting to TL 3.866.207 (Deferred tax effect: TL 773.241) resulting from retirement pay liability calculation has been accounted to extraordinary reserves under equity.

As the maximum liability is updated semi annually, as of September 30, 2018, the maximum amount of TL 5.434,42 effective from July 1, 2018 has been taken into consideration in calculation of provision from employment termination benefits (December 31, 2017 : TL 5.001,76).

Movement of employee termination benefits provisions are presented in the statement below:

	2019	2018
Beginning of the period, 1 January	6.503.684	6.172.934
Charge for the period	1.312.254	867.233
Actuarial gain/loss	1.298.512	(187.327)
Retirement payments (-)	(1.813.348)	(838.516)
End of the period, 30 September	7.301.102	6.014.324

23. Other Liabilities and Expense Accruals

23.1 Provisions related to employee benefits and others

	2019		2018	
	Unused Vacation Provisions	Social Security Premiums Payable	Unused Vacation Provisions	Social Security Premiums Payable
Beginning of the period, 1 January	1.833.998	168.325	1.317.302	1.879.776
Movements in the current period	273.965	22.516.211	734.404	24.473.922
Payments in the current period	(207.809)	(22.445.910)	(217.708)	(26.185.374)
End of the period, 30 September	1.900.155	238.626	1.833.998	168.325

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23. Other Liabilities and Expense Accruals

23.2 Provisions related to employee benefits and others

Company’s statement of pledges and commitments as of September 30, 2019 and December 31, 2018 are presented below:

	30 September 2019		30 December 2018	
	Amount in Original Currency	Amount (TL)	Amount in Original Currency	Amount (TL)
Collaterals, Pledges and Mortgages Given by the Company (CPM)				
A. Total amount of CPMs given on behalf of the Company' legal entity	-	-	-	-
B. Total amount of CPMs given in favor of joint ventures included in full consolidation	-	-	-	-
C. Total amount of CPMs given as the guarantee of the third parties' debts for the maintenance purpose of the ordinary activities		7.786.308	7.871.027	7.871.027
	TL	7.786.308	7.786.308	7.871.027
	USD	-	-	-
D. Total amount of other CPMs given		488.179	565.250	565.250
i. Total amount of CPMs given in favor of the parent company	-	-	-	-
ii. Total amount of CPMs given in favor of other group companies not included in clauses B and C	-	-	-	-
iii. Total amount of CPMs given in favor of third parties not included in clause C		488.179	565.250	565.250
	TL	488.179	488.179	565.250
Total		8.274.487	8.436.277	8.436.277

There is no ratio of CPMs given by the Company to the equity (December 31, 2018: None).

23.3 Provisions, Contingents Assets and Liabilities

Contingent Liabilities	30 September 2019	31 December 2018
Outstanding Claims under litigation (*)	668.222.838	483.639.563
Guarantee fund provision	1.440.123	1.831.997
Business cases provision	1.900.154	1.833.998
Total	671.563.115	487.305.558

Contingent Assets	30 September 2019	31 December 2018
Subrogation Receivable Litigations, Gross	127.257.510	111.065.416
Trade receivable litigations and executions	8.433.800	5.290.428
Total	135.691.310	116.355.844

As of June 24, 2014, Tax Inspection Board of T.C. Ministry of Finance has launched a limited tax investigation related to the Banking and Insurance Transaction Tax for the years 2009, 2010, 2011 and 2012 and as a consequence of the tax inspection, tax of TL 1,8 million and tax penalty of TL 2,8 million for the year 2009 , tax of TL 2 million and tax penalty of TL 3 million for the year 2010 , tax of TL 3 million and tax penalty of TL 4,6 million for the year 2011 and tax of TL 4,3 million and tax penalty of TL 6,4 million for the year 2012 and in total tax and tax penalty of TL 27,9 million related to Banking Insurance Transaction Tax were imposed to the Company. The Company has not booked any provision in the financial statements since it believes that its practice is in compliance with the regulations. On January 16, 2015, the Company filed a reconciliation request for the year 2009 and on February 20, 2015 filed a reconciliation request for the years 2010, 2011 and 2012 to the Large Taxpayers Office Commission of Reconciliation.

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23. Other Liabilities and Expense Accruals

23.4 Provision for Expense Accruals

	30 September 2019	31 December 2018
Commission provision (*)	29.870.537	16.206.481
Expense provision	16.811.488	1.847.440
Other	2.373.120	1.169.918
Guarantee fund provision	9.366.977	10.312.123
Performance premium provision	6.512.149	7.131.516
Unused vacation provision	1.900.155	1.833.998
Business Cases Provision	1.440.123	1.831.997
Donation Provision	16.900.000	0
Total	85.174.549	40.333.473

24. Net Insurance Premium Revenue

	1 January - 30 September 2019			1 July - 30 September 2019		
	Gross	Reinsurance Share	Net	Gross	Reinsurance Share	Net
Motor Crafts Liability (*)	1.068.273.451	(221.315.725)	846.957.726	393.141.392	(76.927.392)	316.214.000
Motor Own Damage	586.943.773	(3.572.047)	583.371.726	227.600.842	(1.076.225)	226.524.617
Fire and Natural Disaster	557.452.817	(439.432.530)	118.020.287	134.586.436	(102.676.082)	31.910.354
General Losses	222.134.982	(151.574.139)	70.560.843	58.223.597	(41.173.851)	17.049.746
Health	270.476.524	(197.778.653)	72.697.871	55.794.624	(37.064.719)	18.729.905
General Liability	134.632.493	(117.113.107)	17.519.386	42.048.645	(37.167.001)	4.881.644
Financial Losses	105.347.289	(71.654.407)	33.692.882	12.719.019	(2.418.301)	10.300.718
Transportation	55.238.357	(36.988.397)	18.249.960	12.897.120	(7.626.892)	5.270.228
Accident	27.785.923	(5.533.398)	22.252.525	11.890.629	(1.745.051)	10.145.578
Water Crafts	16.458.336	(14.458.675)	1.999.661	3.359.531	(2.922.694)	436.837
Air Crafts Liability	22.446.893	(22.446.438)	455	16.001.777	(16.001.536)	241
Air Crafts	39.937.694	(39.937.183)	511	2.741.871	(2.741.826)	45
Fidelity Guarantee	4.936.687	(3.046.219)	1.890.468	2.187.746	(1.541.975)	645.771
Legal Protection	3.038.278	-	3.038.278	1.005.642	-	1.005.642
Credit	2.478.980	(2.378.618)	100.362	618.494	(590.343)	28.151
Support	-	-	-	-	-	-
Total Non-life Branches	3.117.582.477	(1.327.229.536)	1.790.352.941	974.817.365	(331.673.888)	643.143.477
Life - Gross Written premium	-	-	-	-	-	-
Total	3.117.582.477	(1.327.229.536)	1.790.352.941	974.817.365	(331.673.888)	643.143.477

	1 January - 30 September 2018			1 July - 30 September 2018		
	Gross	Reinsurance Share	Net	Gross	Reinsurance Share	Net
Motor Own Damage	493.102.126	(2.216.597)	490.885.529	178.118.285	(885.655)	177.232.630
Fire and Natural Disaster	209.266.901	(3.568.401)	205.698.500	38.848.740	(1.216.733)	37.632.007
Motor Crafts Liability	826.334.115	(39.450.436)	786.883.679	293.140.577	(5.955.768)	287.184.809
Health	422.134.436	(199.751.150)	222.383.286	120.179.782	(57.746.181)	62.433.601
General Losses	217.237.894	(321.595.016)	(104.357.122)	46.315.249	(93.735.360)	(47.420.111)
General Liability	25.785.481	(149.560.916)	(123.775.435)	10.264.449	(24.666.660)	(14.402.211)
Financial Losses	98.802.873	(160.224.972)	(61.422.099)	35.381.080	(30.389.818)	4.991.262
Accident	67.751.257	(26.483.741)	41.267.516	15.849.313	(7.541.191)	8.308.122
Transportation	46.621.079	(85.537.584)	(38.916.505)	12.822.497	(31.095.050)	(18.272.553)
Air Crafts Liability	-	(2.490.133)	(2.490.133)	-	(807.773)	(807.773)
Fidelity Guarantee	8.464.794	(7.968.186)	496.608	3.182.989	(2.353.946)	829.043
Legal Protection	3.620.568	-	3.620.568	1.013.963	-	1.013.963
Air Crafts	2.333.260	(17.528.843)	(15.195.583)	932.270	(12.455.218)	(11.522.948)
Water Crafts	17.529.274	(6.437.858)	11.091.416	12.455.401	(2.581.529)	9.873.872
Credit	4.225.158	-	4.225.158	909.490	-	909.490
Support	3.289.580	(4.224.893)	(935.313)	1.002.808	(909.514)	93.294
Total Non-life Branches	2.446.498.796	(1.027.038.726)	1.419.460.070	770.416.893	(272.340.396)	498.076.497
Life - Gross Written Premium	500	-	500	2.000	-	2.000
Total	2.446.499.296	(1.027.038.726)	1.419.460.570	770.418.893	(272.340.396)	498.078.497

25. Fee Income

None (January 1 – December 31, 2018:None).

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26. Investment Income/(Expense)

	1 January- 30 September 2019	1 July- 30 September 2019	1 January- 30 September 2018	1 July- 30 September 2018
Realized Investment Income / Expenses				
Time Deposit	42.388.952	13.951.537	70.014.941	16.667.765
Private Sector Bonds	43.611.829	21.595.685	27.254.549	11.187.448
Investment Fund	15.313.739	1.204.739	39.501.893	8.973.454
Eurobonds	11.724.108	3.447.497	2.015.222	
Government Bond	18.852.754	10.865.943	(1.484.929)	(1.585.261)
Treasury bond	3.551.989	2.419.204		
Equity Share	4.381.946	637.860	(233.797)	195.195
Repo	-	-		
Total	139.825.317	54.122.465	137.067.879	35.438.601
Unrealized Investment Income / Expenses				
Investment Fund	4.774.650	5.478.499	(20.139.666)	(3.112.978)
Private Sector Bonds	1.465.615	(4.444.030)	7.452.606	3.673.892
Time Deposit	38.119.972	26.727.050	15.421.264	17.886.055
Government Bond	2.520.492	67.176	88.304	72.770
Treasury bond	(98.209)	(32.613)	(101.432)	(33.296)
Repo	214.216	(85.654)		
Eurobonds	2.439.867	353.294	1.168.291	1.327.803
Equity Share	(274.784)	97.015	636.067	1.324.923
Total	49.161.819	28.160.737	4.525.434	21.139.169
Investment Income/Expense, Net	188.987.136	82.283.202	141.593.313	56.577.770

27. Net Accrual Income on Financial Assets

Financial Assets Available for Sale	1 January- 30 September 2019	1 January- 30 September 2018
Valuation differences recognized under shareholders' equity	4.180.423	(22.391.911)
Total	4.180.423	(22.391.911)

28. Assets Held At Fair Value through Profit and Loss

The net gain which is booked in income statement from the fair value difference reflected to gain or loss of the financial assets, is amounting to TL 20.088.387 TL.as of September 30, 2019 (January 1 - December 31, 2018: TL 51.023.421).

29. Insurance Rights and Demands

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Outstanding Claims Reserve Expenses	1 January- 30 September 2019	1 July- 30 September 2019	1 January- 30 September 2018	1 July- 30 September 2018
Motor Crafts Liability	(159.001.611)	(64.360.499)	(145.781.359)	(56.033.567)
Fire and Natural Disaster	1.834.038	(1.523.616)	(16.541.480)	(6.063.512)
General Liability	(25.689.715)	(6.717.200)	(15.640.734)	(7.770.429)
Water Crafts	(1.037.216)	(278.680)	(441.171)	169.784
Health	(1.549.282)	632.514	(221.406)	231.149
Accident	(1.009.808)	(318.696)	(197.275)	198.073
Fidelity Guarantee	(589.126)	(583.080)	(241.781)	(50.456)
Legal Protection	(113.990)	(100.634)	(104.534)	20.298
Air Crafts Liability	(4.158)	(3.763)	(10.042)	(3.008)
Air Crafts	6.383	6.908	(2.749)	(1.796)
Credit	32.880	66.829	1.275	(3.306)
General Losses	(4.573.193)	539.577	(2.952.453)	(2.964.181)
Financial Losses	1.717.620	799.355	(905.264)	(1.101.244)
Transportation	(4.813.432)	(4.300.887)	(3.169.452)	(3.568.782)
Motor Own Damage	(17.576.820)	(7.033.119)	(24.570.452)	(30.620.129)
Total Non-life	(212.367.429)	(83.174.992)	(210.778.877)	(107.561.106)
Life	(7.358)	(3.698)	70.330	597
Total (*)	(212.374.787)	(83.178.690)	(210.708.547)	(107.560.509)

(*)For current previous period comparison please refer to note 4.1.2.3.

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30. Investment Agreement Rights

None (December 31, 2018:None).

31. Mandatory Other Expenses

Types of expenses are disclosed in Note 32.

32. Expense Types

	1 January- 30 September 2019	1 July- 30 September 2019	1 January- 30 September 2018	1 July- 30 September 2018
Production Commissions (-)	(404.000.306)	(144.011.403)	(352.397.733)	(124.692.439)
Employee Wages and Expenses (-) (*) (Note 33)	(79.310.406)	(26.566.223)	(65.097.814)	(21.249.283)
Information Technology Expenses (-)	(13.466.297)	(4.597.764)	(11.346.348)	(3.885.819)
Rent Expenses (-)	(1.925.690)	(810.208)	(7.445.722)	(2.579.567)
Advertisement Expenses (-)	(3.062.901)	(991.942)	(5.299.894)	(1.539.636)
Meeting and Training Expenses (-)	(5.568.995)	(1.806.142)	(3.631.162)	(833.762)
Transportation Expenses (-)	(3.166.353)	(1.044.159)	(4.438.548)	(1.671.884)
Other (-)	(7.921.992)	(2.805.415)	(4.218.466)	(1.536.592)
Social Relief Expenses (-)	(3.790.864)	(1.250.384)	(2.919.871)	(915.539)
Repair and Maintenance Expenses (-)	(3.142.561)	(1.136.963)	(2.224.227)	(649.721)
Outsourcing Service Expenses (-)	(2.349.511)	(608.685)	(1.630.956)	(296.372)
Communication Expenses (-)	(1.419.100)	(474.361)	(1.155.827)	(258.565)
Reinsurance Commissions (+)	156.295.616	56.132.843	134.738.147	49.321.820
Total	(372.829.360)	(129.970.806)	(327.068.421)	(110.787.359)

(*) The Company makes payments to pension contribution (3% of the monthly gross salary) for the employees who fulfill conditions and this amount is presented in employees wages and expenses.

33. Employee Wages and Expenses

	1 January- 30 September 2019	1 July- 30 September 2019	1 January- 30 September 2018	1 July- 30 September 2018
Salary and Bonus Payments	(64.481.612)	(21.641.819)	(54.587.326)	(17.940.165)
Insurance Payments	(13.156.263)	(4.401.536)	(8.528.892)	(2.822.197)
Other Payments	(5.463.395)	(1.773.252)	(4.901.467)	(1.402.460)
Total (Note 32)	(83.101.270)	(27.816.607)	(68.017.685)	(22.164.822)

34. Financing Costs

34.1 Financial Expenses:

None (December 31, 2018: None).

34.2 Current period' s financial expenses related to shareholders, affiliates and subsidiaries

None (December 31, 2018: None).

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34.3 Sales transactions with shareholders, affiliates and subsidiaries

Disclosed in Note 45.

34.4 Interest, rent and similar balances with shareholders, affiliates and subsidiaries:

Disclosed in Note 45

34. Financing Costs (Continued)

34.5 Hedge accounting principle

None (December 31, 2018: None).

Type risk and principle of the cash flow hedge

None (December 31, 2018: None).

34.6 Exchange differences, other than those arising from financial assets held at fair value through profit and loss.

None (December 31, 2018: None).

35. Corporate Tax

	<u>30 September 2019</u>	<u>31 December 2018</u>
<u>Current Tax Liability:</u>		
Corporate Tax Liability Provision on Period Profit	80.481.425	66.694.754
Prepaid Taxes and Other Liabilities on Period Profit (-)	(53.867.931)	(54.453.247)
Total	<u>26.613.494</u>	<u>12.241.507</u>

	<u>1 January-</u> <u>30 September 2018</u>	<u>1 July-</u> <u>30 September 2018</u>	<u>1 January-</u> <u>30 September 2017</u>	<u>1 July-</u> <u>30 September 2017</u>
<u>Tax (Expense) / Income is Formed by the Items Below:</u>				
Current Tax Income / (Expense)	(80.481.425)	(20.707.865)	(60.451.668)	(31.655.929)
Deferred Tax Income / (Expense) due to Temporary Differences	(3.363.588)	(6.057.507)	11.000.863	10.686.719
Total Tax Income / (Expense)	<u>(83.845.013)</u>	<u>(26.765.372)</u>	<u>(49.450.805)</u>	<u>(20.969.210)</u>

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35. Corporate Tax (Continued)

Deferred Tax

The Company recognizes deferred tax assets and liabilities based upon temporary differences arising between its financial statements as reported for TFRS purposes and its statutory tax financial statements. These differences usually result in the recognition of revenue and expenses in different reporting periods for TFRS and tax purposes and they are given below. Tax rate is applied as 20% for the calculation of deferred tax asset and liabilities.

<u>Deferred Tax</u>	<u>2019</u>	<u>2018</u>
Recognized in the Shareholders' Equity:		
Valuation of Financial Assets Available for Sale	(1.045.106)	2.659.669
Hedge Effect		
Actuarial Gain/Loss Effect	1.160.207	900.505
Total	115.101	3.560.174

Items that are subject to deferred tax and corporate tax are summarized as follows:

<u>Movements of Deferred Tax Assets / (Liabilities):</u>	<u>2019</u>	<u>2018</u>
Beginning of the Period, 1 January	16.972.963	9.702.374
Deferred Tax Income Recognized in the Income Statement	(3.363.588)	120.044
Deferred Tax Income Recognized in the Shareholders' Equity	(3.445.072)	7.150.545
Previous Year Tax Adjustment	(7.289.924)	
Closing Balance, 30 June	2.874.379	16.972.963

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35 Corporate Tax (Continued)

Reconciliation of period tax expense with net income for the period is as below:

Reconciliation of Tax Provision	2019	2018
Income Before Tax	342.846.591	294.193.790
Tax Calculated: 22%	(75.426.250)	(64.722.634)
Effect of Additions	(38.967.194)	(20.416.770)
Effect of Allowances, net	33.912.019	18.444.650
Corporate Tax Liability Provision on Current Period Profit	(80.481.425)	(66.694.754)

	2019	2018
Loss before tax	342.846.591	294.193.790
Calculated tax revenue: %22	(75.426.250)	(64.722.634)
Tax rate change impact	(7.289.924)	
Disallowable expenses	(1.243.940)	(1.660.028)
Effect of tax rate change	-	772.559
Part of deferred tax recognized in equity	115.101	-
Current period tax expense	(83.845.013)	(65.610.103)

36. Net Foreign Exchange Gain/Loss

	1 January- 30 September 2019	1 July- 30 September 2019	1 January- 30 September 2018	1 July- 30 September 2018
Recognized in Profit / Loss:				
Foreign Exchange Income	142.828.427	(10.053.174)	263.160.679	186.192.017
Foreign Exchange Expense	(122.949.928)	(44.145.568)	(233.494.413)	(148.087.431)
	19.878.499	(54.198.742)	29.666.266	38.104.586

37. Earnings per Share

	2019	2018
Number of Equity Shares Outstanding Beginning Period, 1 January	30.600.000.000	30.600.000.000
Number of Equity Shares Issued in Cash	-	-
Number of Equity Shares Outstanding End of Period, 30 September	30.600.000.000	30.600.000.000
Weighted Average Number of Outstanding Shares (Unit of 1; TL 0,01)	30.600.000.000	30.600.000.000
Net Profit for the Period / (Loss) (TL)	259.001.578	165.131.100
Earnings / (Loss) per Share (TL)	0,846	0,540

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

38. Dividends per share

Pursuant to the decision taken in the Company’s Ordinary General Meeting held on March 4, 2019, the company hasn’t got net profit on the financial statements as of December 31,2017. Company has not been distributed profit to the shareholders.

39. Cash Generated from the Operations

Cash flow statement has presented with the financial statements of the Company.

40. Equity Share Convertible Bonds

None (December 31, 2018: None).

41. Cash Convertible Privileged Equity Shares

None (December 31, 2018: None).

42. Risks

The Company’s contingent asset and liabilities are presented in Note 23.3.

43. Commitments

Total amount of off balance sheet commitments are presented in Note 23.2.

44. Business Combinations

None (December 31, 2018: None).

45. Related Parties

The details of transactions between the Company and other related parties are disclosed below:

Related Party Receivables / (Payables)

Related party receivable balance is presented under “Other Related Party Receivable” line of financial statements. Rest of the balance is presented under “Receivable from Insurance Operations” line of financial statements.

	30 September 2019	31 December 2018
Shareholders	69.582.357	62.857.652
Related Parties	2.306	61.264
Total	69.584.663	62.918.916

Premium production

	1 January- 30 September 2019	1 July- 30 September 2019	1 January- 30 September 2018	1 July- 30 September 2018
Shareholders	127.509.833	42.321.029	101.024.745	29.569.727
Related Parties	1.751.210	598.549	1.478.089	497.478
Total	129.261.043	42.919.578	102.502.834	30.067.205

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45. Related Parties (Continued)

Claims Paid

	1 January- 30 September 2019	1 July- 30 September 2019	1 January- 30 September 2018	1 July- 30 September 2018
Shareholders	20.184.318	6.958.303	34.874.297	(1.724.653)
Related Parties	-	-	154	(0)
Total	20.184.318	6.958.303	34.874.451	(1.724.653)

	30 September 2019	31 December 2018
Related Parties	344.166.433	322.410.622
Total	344.166.433	322.410.622

	30 September 2019	31 December 2018
Related Parties	46.029.239	48.709.250
Total	46.029.239	48.709.250

	30 September 2019	31 December 2018
Related Parties	113.443.439	168.805.699
Total	113.443.439	168.805.699

Interest Income Received from Related Party

	1 January- 30 September 2019	1 July- 30 September 2019	1 January- 30 September 2018	1 July- 30 September 2018
Related Parties	47.365.274	19.994.374	42.943.060	23.015.930
Total	47.365.274	19.994.374	42.943.060	23.015.930

Payables to shareholders balance includes dividends that have not yet been taken by the shareholders.

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46. Subsequent Events

None.

47. Other

Details of “Other” items in the balance sheet which exceed 20% of its respective account group of 5% of total assets:

Other Receivables	30 September 2019	31 December 2018
Receivables from Tarm Sigortaları A.Ş.	6.944.009	12.961.070
Receivables from Agencies due to DASK Premiums	4.403.328	4.489.770
Other Receivables	2.702.482	2.699.367
Total	14.049.819	20.150.207

Other Short Term Payables	30 September 2019	31 December 2018
Payables to Turkish Catastrophe Insurance Pool	19.907.005	18.902.758
Payables to contracted enterprises	41.908.685	54.098.804
Payables to suppliers	13.245.224	26.701.130
Turkish Catastrophe Insurance Pool Payables to Agencies	1.143.664	937.702
Other	1.065.302	3.961.451
Total	77.269.880	104.601.845

Other Prepaid Expenses (Short Term)	30 September 2019	31 December 2018
Prepaid Expenses (*)	2.645.238	5.062.036
Total	2.645.238	5.062.036

Other Prepaid Expenses (Long Term)	30 September 2019	31 December 2018
Prepaid Expenses (*)	149.980	149.980
Total	149.980	149.980

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

47. Other (Continued)

Income and Profit / Expenses and Losses from Other and Extraordinary Activities	1 January- 30 June 2019	1 April- 30 June 2019	1 January- 30 June 2018	1 April- 30 June 2018
Provisions Account (+/-)	(16.489.832)	(13.700.464)	(39.275.688)	(19.436.039)
unrequited provision	30.116.653	-	(4.645.996)	(4.645.996)
Provisions for doubtful receivable (Note 12.1)	(24.120.904)	(6.525.126)	(12.246.679)	(6.409.455)
Donation(*)	(16.900.000)	(6.100.000)	(11.200.000)	(4.700.000)
Guarantee Fund Provision			(7.483.627)	(2.656.474)
Portfolio Management	(3.332.916)	(931.785)	(2.341.014)	(766.541)
Retirement pay provision	(1.312.254)	(437.418)	(867.233)	(288.178)
Unused vacation provision	(273.965)	602.230	(265.291)	143.001
Provisions for other expenses	(666.446)	(308.365)	(225.848)	(112.396)
Compulsory earthquake insurance account (+/-)	1.320.359	48.868	1.056.785	16.958
Deferred tax asset account (+/-)	(3.363.588)	(6.057.507)	11.000.863	10.686.719
Other income and profits	1.256.058	346.007	943.337	308.014
Other expenses and losses (-)	(38.042.515)	(2.681.481)	(6.228.715)	(2.093.816)
Bank Expenses	(6.131.856)	(2.340.139)	(4.490.940)	(1.408.196)
Certificate of Insolvency	-	-	-	-
Non-tax-deductible expenses	(574.604)	(54.959)	(716.540)	(280.921)
Expense on property sale			(830.300)	(346.121)
Other	(31.336.055)	(286.383)	(563.022)	(214.073)
Total	(55.319.518)	(22.044.577)	(32.503.418)	(10.518.164)

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**CONVENIENCE TRANSLATION OF THE STATEMENT OF PROFIT DISTRIBUTION
AS OF SEPTEMBER 30, 2018**

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