HALKBANK

2024 TSRS-COMPLIANT SUSTAINABILITY REPORT

Limited Assurance Statement

KPMG

KPMG Bağımsız Denetim ve
Serbest Muhasebeci Mali Müşavirlik A.Ş.
İş Kuleleri Kule 3 Kat:2-9
Levent 34330 İstanbul
Tel +90 212 316 6000
Fax +90 212 316 6060
www.kpmg.com.tr

INDEPENDENT AUDITOR'S LIMITED ASSURANCE REPORT ON THE INFORMATION IN ACCORDANCE WITH THE TURKISH SUSTAINABILITY REPORTING STANDARDS

To the General Assembly of Türkiye Halk Bankası A.Ş.

We were engaged by Türkiye Halk Bankası A.Ş. ("the Bank") and its subsidiary (together will be referred to as "the Group") to provide limited assurance on the information ("Sustainability Information") presented in the TSRS-Compliant sustainability report for the year ended 31 December 2024 has been prepared in accordance with TSRS 1 General Requirements for Disclosure of Sustainability Related Financial Information and TSRS 2 Climate-related Disclosures (collectively referred to as "TSRS"), as published by the Public Oversight Accounting and Auditing Standards Authority ("POA").

Our assurance engagement does not cover any information other than the Sustainability Information provided in the website links included in the TSRS Compliant Sustainability Report.

Limited Assurance Conclusion
Based on the procedures performed and the evidence obtained, as summarized under the heading "Summary of Work Performed as a Basis for the Assurance Conclusion," nothing has come to our attention that causes us to believe that the Group's Sustainability Information for the year ended 31 December 2024 has not been prepared, in all material respects, in accordance with the TSRS.

Emphasis of Matters
In the About the Report section of the TSRS-Compliant sustainability report, in its first annual reporting period in which the Group has applied the TSRS, the Group has disclosed only information related to climate-related risks and opportunities in accordance with TSRS 1, and information for the previous period has not been presented as comparative information. However, our conclusion is not modified in respect of this matter.

In the About the Report section of the TSRS-Compliant sustainability report, the Group has utilized the exemption from disclosing Scope 3 greenhouse gas emissions, which is valid for the first two years, in accordance with Provisional Article 3 of the Board Decision on the Scope of Application of the Turkish Sustainability Reporting Standards (TSRS) published in the Official Gazette dated 29 December 2023 and numbered 32414. Therefore, as the accompanying TSRS-Compliant sustainability report is the Group's first TSRS-Compliant sustainability report prepared in accordance with the TSRS, Scope 3 greenhouse gas emissions have not been disclosed. However, our conclusion is not modified in respect of this matter.

Inherent limitations in the preparation of the Sustainability Information
Sustainability Information contains climate-related scenario-based information that is subject to inherent uncertainty due to incomplete scientific and economic knowledge regarding the likelihood, timing, or effects of possible future physical and transitional climate-related events.

In addition, the quantification of greenhouse gases is also subject to inherent uncertainty due to the lack of sufficient scientific knowledge required to determine the values used for emission factors and to combine different gas emissions.

Responsibilities of Management and Those Charged with Governance for the Sustainability Information

The Group's management is responsible for the following:
- The design, implementation, and maintenance of internal control as deemed necessary to ensure that the Sustainability Information is prepared free from material misstatement, whether due to fraud or error;
- The preparation of the Sustainability Information in accordance with the TSRS;
- Additionally, the Group's management is also responsible for selecting and applying appropriate sustainability reporting methods, as well as making reasonable assumptions and estimates that are appropriate to the circumstances.

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

KPMG

Auditor's Responsibilities for the Limited Assurance Engagement on the Sustainability Information

We are responsible for the following:
- To plan and perform the engagement to obtain limited assurance about whether the Sustainability Information contains material misstatements, whether due to fraud or error.
- To reach an independent conclusion based on the evidence obtained and the procedures performed; and
- To communicate our conclusion to the Group management.

As we are responsible for expressing an independent conclusion on the Sustainability Information prepared by management, we are not permitted to be involved in the preparation of the Sustainability Information, as such involvement could compromise our independence.

Application of Professional Standards
Our limited assurance engagement was conducted in accordance with Assurance Engagement Standard 3000 "Assurance Engagements Other than Audits or Reviews of Historical Financial Information" and Assurance Engagement Standard 3410 "Assurance Engagements on Greenhouse Gas Statements" as issued by the Public Oversight, Accounting and Auditing Standards Authority ("POA"). Our responsibilities under these assurance standards are described in detail in the Auditor's Responsibilities for the Limited Assurance Engagement on the Sustainability Information section of our report.

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

Independence and Quality Management
We have complied with the independence requirements and other ethical provisions of the Code of Ethics for Independent Auditors (including Independence Standards) issued by POA, which is built upon the fundamental principles of integrity, objectivity, professional competence and due care, confidentiality, and professional behavior.

KPMG is responsible for implementing the provisions of Standard on Quality Management 1 ("SoQM 1") Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements, and for maintaining a comprehensive quality management system, including written policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

Summary of Work Performed as a Basis for the Assurance Conclusion
We are required to plan and perform our work to address areas where we have identified a higher risk of material misstatement in the Sustainability Information. The procedures we apply are based on our professional judgment. In conducting our limited assurance engagement on the Sustainability Information:
- Interviews were conducted with key senior personnel of the Bank to understand the processes in place for obtaining the Sustainability Information for the reporting period;;
- Interviews were conducted with those responsible for the Sustainability Information.
- The Group's internal documentation was used to evaluate and review the sustainability-related information..
- An evaluation of the disclosure and presentation of the sustainability-related information was performed.
- Through inquiries, an understanding was obtained regarding the Group's control environment and information systems related to the preparation of the Sustainability Information. However, the design of specific control activities was not evaluated, no evidence was obtained regarding their implementation, and their operating effectiveness was not tested.
- The accuracy of the Sustainability Information was tested, on a sample basis, by comparing it with the Group's supporting documentation.
- The appropriateness of the Group's estimation methodologies and their consistent application were evaluated. However, our procedures did not include testing the data on which the estimates are based or developing our own estimates to assess those made by the Group.
- The selection of quantification methodologies and reporting policies for greenhouse gases was evaluated.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Şirin Soysal, SMMM
Partner

8 August 2025 Istanbul, Türkiye

Table of Contents

Tables

Abbreviations

ADC	Alternative Distribution Channels
BECCS	Bioenergy with Carbon Capture and Storage
CAR	Capital Adequacy Ratio
CBAM	Carbon Border Adjustment Mechanism
CCS	Carbon Capture and Storage (CCS)
CDP	Carbon Disclosure Project
CGAT	Corporate Governance Association of Türkiye
CGF	Credit Guarantee Fund
CRR	Company Rating Report
EFR	European Financial Reporting
ERM	Enterprise Risk Management
ESG	Environmental, Social and Governance
GCM	General Circulation Model
GHG	Greenhouse Gas
GRI	Global Reporting Initiative
HPP	Hydroelectric Power Plant
ICAAP	Internal Capital Adequacy Assessment Process
IFRS	International Financial Reporting Standards
ISO	International Organization for Standardization
KOSGEB	Small and Medium Enterprises Development Organization of Türkiye
KPI	Key Performance Indicator
NACE	Statistical Classification of Economic Activities in the European Community (Nomenclature of Economic Activities)
NDC	National Contribution Statement
NZBA	Net-Zero Banking Alliance
RCM	Regional Climate Model
RCP	Representative Concentration Pathway (RCP)
RWA	Risk-Weighted Asset
SASB	Sustainability Accounting Standards Board
SBTi	Science Based Targets Initiative
SDG	Sustainable Development Goals
SEDEA	Sustainable Education Development and Excellence Association
SME	Small and Medium-sized Enterprises
TCFD	Task Force on Climate-Related Financial Disclosures
TSRS	Türkiye Sustainability Reporting Standards
UNEP FI	United Nations Environment Programme Finance Initiative
VRF	Value Reporting Foundation

Introduction

In line with its sustainability vision, Halkbank adopts a transparent reporting approach that complies with international standards and adheres to applicable legal requirements. This Sustainability Report has been prepared in accordance with the Türkiye Sustainability Reporting Standards (TSRS), which came into force on 29 December 2023. The report presents sustainability and climate-related information required under the TSRS. This information is published by Halkbank as a standalone document, separate from disclosures made to meet other regulatory obligations. All sustainability disclosures within this report have been prepared in line with the relevant TSRS standards and structured to be clear, identifiable, and easy to understand.

The TSRS enables companies to report, in a clear and reliable manner, the current and anticipated financial impacts of their activities in the areas of governance, social factors, natural resource use, and climate change. The standard addresses the financial implications of sustainability- and climate-related risks and opportunities, aiming to provide a perspective that is consistent with financial reporting, meaningful for decision-makers, and integrated in scope.

In alignment with TSRS 1 – General Requirements for the Disclosure of Sustainability-related Financial Information and TSRS 2 – Climate-related Disclosures, Halkbank presents relevant information under the headings of Governance of Risks and Opportunities, Strategy and Impact on the Business Model, Risk Management Framework, and Metrics and Targets. The Bank assesses the critical elements of its sustainability strategy—particularly those related to climate change risks and opportunities—through an integrated approach that brings together governance mechanisms, risk management processes, and performance indicators.

In accordance with TSRS provisions, this reporting period contains detailed disclosures on climate-related risks. Sustainability risks, however, are not covered in this report due to the transitional exemption currently in place. As this is the Bank's first reporting period under TSRS, comparative information from prior years is not required and is therefore not presented. Furthermore, the sustainability metrics, targets, and projections disclosed in this report are based on the Bank's current data, assumptions, and forward-looking expectations. These may involve significant uncertainties arising from changes in climate policies, market dynamics, technological developments, regulatory changes, and physical environmental conditions. Such uncertainties could cause reported figures and performance indicators to differ from future actual results, and users of this report should take these into account when evaluating the information presented.

The sustainability-related topics covered in the report are presented based on analyses that are either disaggregated or aggregated, taking into account the sectors and geographic regions in which the Bank operates. Decisions to aggregate or disaggregate data have been made to ensure that disclosures remain clear, comparable, and meaningful, avoiding the unnecessary grouping of unrelated topics or the obscuring of material information with immaterial content.

This TSRS Compliance Report covers the period from 1 January to 31 December 2024 and includes climate- and sustainability-related disclosures for Halkbank and all its subsidiaries, in line with the consolidated financial statement scope presented in the Halkbank 2024 Integrated Annual Report.

1

Governance of Risks and Opportunities

In line with TSRS 1 (12 -14) and TSRS 2 (5 -6), the Bank's Board of Directors is responsible for overseeing sustainability- and climate-related risks and opportunities that could materially affect financial performance and long-term strategy. Relevant committees ensure that climate-related and broader environmental, social, and governance (ESG) risks are integrated into the Bank's corporate governance, business strategy, and financial decision-making processes. In addition, the monitoring of sustainability- and climate-related risks and opportunities falls under the mandate of the Risk Management Department.

1.1. Approach to Sustainability and Climate Risks and Competence of Responsible Persons

Together with its subsidiaries, the Bank has established a multi-layered governance structure to ensure the effective implementation and management of sustainability practices. The Board of Directors is briefed by committees and responsible officers on sustainability performance and/or climate risks at least once a year. In 2024, the Board received three such briefings.

The duties of the **Audit Committee, Operational Risk Committee, Business Continuity Emergency and Contingency Committee, Sustainability Committee**, and their respective working groups—each reporting to the Board—are outlined below in the context of sustainability- and climate-related risks and opportunities:

- In addition to its mandate for the early detection of risks that may threaten the Bank's existence, growth, or continuity, the **Audit Committee** is also responsible for evaluating whether appropriate methods, tools, and procedures are in place to identify, measure, monitor, and control all risks borne by the Bank, including those related to climate.
- **Operational Risk Committee** reviews and evaluates the Bank's operational risks—on both a solo and consolidated basis—including operational losses associated with climate-related events, and takes decisions on necessary mitigation measures.
- **Business Continuity Emergency and Contingency Committee** assesses situations that could disrupt business continuity, including climate-related emergencies, and takes decisions on the necessary response and preventative measures.
- **Sustainability Committee** oversees, coordinates, and directs the Bank's progress on sustainability matters. The Committee is also tasked with establishing sub-working groups on issues requiring cross-departmental collaboration, such as the management of sustainability- and climate-related risks and opportunities. These risks are reviewed in light of current developments, and relevant updates are provided at least annually during regular committee meetings.
  - ✓ **Sustainable Finance Sub-Working Group** is responsible for the classification of green loans and loans aligned with the Sustainable Development Goals (SDGs) and for establishing the related reporting infrastructure.
  - ✓ **Climate-Related Risk Management Sub-Working Group** is responsible for the preparation of heat maps, oversight and monitoring of the process[1], the measurement of climate-related risks, and the establishment of related reporting systems.
  - ✓ **Sustainability Communication and Project Management Sub-Working Group:** is responsible for enhancing sustainability awareness across the Bank and developing social projects related to sustainability.

Following their meetings during the year, the Audit Committee, Operational Risk Committee, Business Continuity Emergency and Contingency Committee, and Sustainability Committee present their assessments, observations, and—where applicable—recommendations to the Board of Directors. Detailed information on the roles and memberships of these committees is available in the ***Board of Directors and Committees*** section of the Halkbank 2024 Integrated Annual Report.

The committees and working groups are also supported by documented responsibilities and concrete targets regarding sustainability- and climate-related risks and opportunities.

The responsibilities assigned for the oversight of climate-related risks and opportunities are specified in documents related to the management of climate-related financial risks. Work is ongoing to further develop these documents to ensure that such responsibilities are articulated in a clearer and more traceable manner.

[1] In order to evaluate the heat map study conducted in 2023, the Climate-Related Risk Management Sub-Working Group has reconvened in 2024.

1.2. Integration of the Three Lines of Defense

An important element of the Bank's governance framework for managing climate-related risks and opportunities is the Three Lines of Defense risk management model. This model enables the Bank to monitor all stages of climate-related risks and opportunities, supporting effective governance and ensuring that these risks and opportunities are comprehensively assessed.

Through the Three Lines of Defense model, risks are managed systematically across all levels of Halkbank. The model ensures that climate-related risks and opportunities are identified, assessed, and monitored, and that in-depth analyses are conducted on these factors.

Halkbank recognizes that integrating the Three Lines of Defense into its climate risk governance framework is a key component of effective risk management. The Bank believes that enhancing this model to explicitly incorporate the climate risk cycle will further strengthen its overall risk management capacity.

Table 1. Three Lines of Defense

1.2. Integration of the Three Lines of Defense

Teams responsible for managing client relationships and leading the completion of transactions serve as the first line of defense in managing climate-related risks and opportunities. These teams are accountable for ensuring compliance with relevant policies and guidelines, obtaining necessary approvals, conducting analyses, maintaining required documentation, and implementing processes within the framework of the Bank's climate risk policies.

The second line of defense provides complementary expertise, support, oversight, and challenge functions related to risk management. This includes the development, implementation, and continuous improvement of risk management practices—covering internal control, compliance with laws and regulations, adherence to accepted ethical standards, information and technology security, sustainability, and quality assurance—across processes, systems, and the organization as a whole.

The second line also conducts ongoing assessments of the management of climate-related financial risks, including monitoring and measuring such risks in line with both internal capital requirements and regulatory capital adequacy standards.

The third line of defense is based on the internal audit function. Internal Audit teams regularly review the Bank's compliance with internal policies and regulations relating to climate-related financial risks. This function supports a strong, embedded credit risk culture by ensuring that all personnel involved throughout the credit lifecycle have sufficient awareness of the interaction between banking activities and initiatives aimed at preventing climate change and promoting sustainability.

The Bank aims for full integration of climate-related risk considerations into its current loan approval processes. The environmental and social impacts of loan applicants' activities are assessed through the "Sustainability and Environment" questionnaire included in the Corporate Rating Report, and the resulting sustainability performance directly affects the customer's credit rating.

To enhance the effectiveness of its climate and environmental risk assessments, the Bank continuously reviews both domestic and international best practices and works to expand the scope of its questionnaire.

1.3. Involvement and Expertise of Senior Management in Sustainability Governance

Halkbank has identified the governance bodies responsible for monitoring, managing, and evaluating sustainability- and climate-related risks and opportunities, and has disclosed their respective competencies. Detailed information on the Board of Directors, the Audit Committee, and their competency matrices can be found in the ***Board of Directors and Audit Committee*** section of the Halkbank 2024 Integrated Annual Report.

Halkbank has also developed strategies to enhance the capabilities of relevant employees in addressing sustainability- and climate-related risks and opportunities. The competencies of governance bodies in climate-related matters are strengthened through external training programmes, and the technical knowledge levels of employees are reviewed annually, with capacity-building initiatives undertaken where necessary. Accordingly, in 2024, senior management participated in various training and certification programmes to enhance their competencies in sustainability and in identifying and managing climate-related risks and opportunities. Participants included the Deputy General Manager for Treasury and Funding Management, the Head of International Banking Group, the Head of the Sustainability Department, the Head of SME Loans-1 Department, the Head of Corporate and Commercial Marketing-2 Department, the Head of Corporate Architecture Department, and the Head of International Banking Department. Additionally, 116 employees from 33 different units completed the Bank's Sustainability Expertise Certification Programme, and a total of 5,579 hours of sustainability-related training were delivered. Training and competency development needs are determined based on the responsibilities of relevant managers, sectoral priorities, and emerging climate-related risks.

Halkbank's performance evaluation processes are designed to ensure alignment between employees' individual objectives and the Bank's corporate sustainability strategy. Progress towards sustainability- and climate-related goals—such as increasing the share of renewable energy, reducing the carbon footprint, and managing environmental risks—is monitored through defined metrics, some of which are incorporated into performance-based bonus systems at specific management levels. The Sustainability Committee, which reports to the Board of Directors, regularly oversees the setting and tracking of these targets.

In line with the Bank's strategy to enhance awareness of sustainability and climate-related issues, specific performance indicators have been added to employees' performance criteria. Performance scorecards, developed in line with the **Head Office Performance and Bonus System** document, enable the individual monitoring of employee performance. For example, 25% of the performance scorecard of the Head of International Banking Group is dedicated to sustainability-related topics.

Under the ISO 14001 Environmental Management System and ISO 50001 Energy Management System requirements, the monitoring of energy performance and resource efficiency directly influences the bonuses of the Head of International Banking Group, the Head of Sustainability Department, departmental managers, and employees.

Further information on the Bank's Remuneration and Special Employee Policy is available on the ***Principles and Policies*** page of the Halkbank website.

1.4. Stakeholder Engagement and Reporting of Climate Strategies to Investors

The Bank actively engages with key stakeholders—including investors, regulatory authorities, customers, and industry groups—to ensure transparency and alignment in climate-related strategies. Regular reporting, in line with TSRS requirements and TCFD recommendations, provides stakeholders with information on the Bank's climate risks, opportunities, and transition plans. Through its Integrated Annual Reports and CDP disclosures, Halkbank shares data on financed emissions, green finance, and sector-specific emission reduction targets. The Bank continuously evaluates stakeholder feedback and refines its engagement approach to strengthen governance, improve climate risk management, and support long-term value creation.

2

Strategy and Impact on the Business Model

2. Strategy and Impact on the Business Model

Halkbank aims to make its loan portfolio and operations more resilient to climate change as part of its Climate Transition Plan. Its key priorities include achieving net-zero emissions by 2050, managing climate risks effectively, and supporting groups with limited access to finance. In 2024, the Bank aligned its activities with all Sustainable Development Goals (SDGs)—notably Climate Action, Responsible Consumption and Production, Quality Education, Gender Equality, and Partnerships for the Goals—and contributed to each of them. Details of the SDGs to which the Bank contributes are available *here.*

Fully aware of the risks that threaten a sustainable future, Halkbank continues to minimize its environmental footprint through comprehensive policies and concrete commitments. Climate-related risks and opportunities are disclosed in line with TSRS requirements and assessed according to the Bank's target audience and strategic expectations. The Bank evaluates climate-related risks under two main categories—Transition Risks and Physical Risks—and provides general descriptions of each.

By embedding climate strategy into its lending processes, Halkbank has taken concrete steps towards improving operational efficiency and reducing carbon emissions. The Bank has implemented both the ISO 14001 Environmental Management System and the ISO 50001 Energy Management System across all service locations. In addition, the Energy and Natural Resource Management System (EDYS) allows real-time monitoring of energy consumption, enabling more efficient use of resources.

Halkbank recognizes the vital role of women's equal participation in economic life in achieving sustainable development. In 2024, the Bank issued the Halkbank Üreten Kadınlar Variable Fund (Halkbank Women Entrepreneurs Variable Fund - HKG) to provide investment opportunities in companies that support the empowerment of women in employment and management. The portfolio of the fund consists of domestic debt instruments, lease certificates, and equity shares of companies included in the BIST 100 index that meet criteria set in consultation with Istanbul University, including the presence of at least one woman on the board of directors or in a decision-making management position.

In the same year, Halkbank also launched the Halkbank Sustainability 30 Companies Equity Fund (ZHH), offering investments in publicly listed companies with strong sustainability performance. These companies are selected from those demonstrating high performance against ESG criteria such as climate change mitigation, natural resource conservation, water scarcity, health, safety, and employment practices.

The Bank closely monitors customer and investor expectations, while keeping abreast of new policies and regulatory developments. The Bank also regularly monitors technological developments and innovative solutions, incorporating them into its strategic decision-making processes, and implements contingency action plans to enhance the resilience of its business model and operations against sustainability- and climate-related risks. In the event of potential risks, including emergencies such as extreme weather events, pre-defined action plans are activated in accordance with the severity of the situation to minimize operational disruptions. Measures implemented to ensure business continuity include deploying mobile branch services, directing customers to alternative branches, and managing operational resources efficiently.

2.1. Halkbank's Approach to Sustainability and Climate Risks and Opportunities

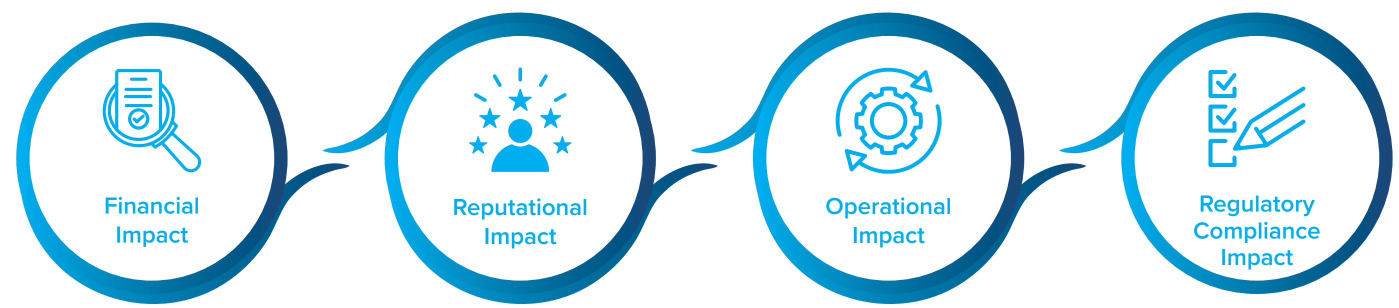
The definitions of current and anticipated impacts of climate-related risks and opportunities on Halkbank's business model and value chain are set out in detail in the Bank's Climate-Related Risks Table. Climate change–related physical and transition risks may have both direct and indirect effects on the Bank's loan portfolio, operational activities, and reputation management. Physical risks are particularly significant for loans extended to sensitive sectors such as energy and tourism, where they may affect repayment capacity. Transition risks, on the other hand, may influence the Bank's financial risk profile as regulatory requirements for carbon-intensive sectors increase. Climate risks are therefore managed by integrating them into the Bank's credit strategies.

Across the value chain, the most pronounced impacts are observed within the customer portfolio. At the same time, areas such as sustainability-linked products, green finance, and ESG-aligned portfolio management are regarded as the primary channels for capturing climate-related opportunities.

Climate risks are scored on a scale of 0 to 3 according to the criteria determined in **Table 2** in terms of financial, reputational, operational, and regulatory compliance impacts. Each identified climate-related risk is assessed against these criteria to determine a Total Impact Score. This score is then multiplied by the corresponding likelihood value (rated from 1 to 5) to produce the final Risk Score.

Total Impact Score = *Average (Financial Impact; Reputational Impact; Operational Impact; Regulatory Compliance Impact)*

Risk Score = *Total Impact Score x Probability*



The potential impact of a given risk on the regulatory capital is assessed.
✓ No impact,
✓ <1% change Low impact,
✓ 1-5% change Medium impact,
✓ >5% change High impact

The impact of the risk on brand trust and public perception is assessed under the following categories.
✓ No impact or insignificant,
✓ Decreasing trust; attracts limited attention,
✓ Reputation is damaged; limited media interest,
✓ Significant reputation loss; wide media interest.

Measures the potential duration of disruption and business interruption the risk may cause in operational processes, rated according to the following scale.
✓ No operational disruption,
✓ Minor disruption; can be remedied quickly,
✓ Temporary disruption; partial interruption of operations
✓ Prolonged disruption; complete cessation of operations

Assessed based on the level of compliance with regulatory requirements, ranging from minor violations to situations that may require serious legal action.
The assessment categories are as follows:
✓ No compliance requirement,
✓ Minor non-compliance, low-level penalty,
✓ Moderate non-compliance; regulatory attention,
✓ Serious regulatory penalty, risk of legal action.

2.1. Halkbank's Approach to Sustainability and Climate Risks and Opportunities

The Bank further identifies the expected timeframes for the potential impacts of climate-related risks and opportunities within a reasonable framework, classifying them as short-term (<1 year), medium-term (1–5 years), and long-term (5+ years). Physical risks are expected to have more prolonged impacts, while transition risks are anticipated to be more prominent in the medium term. Risk management strategies and action plans are developed with these timeframes in mind.

In line with the risk scoring methodology outlined above, the Bank has assessed the risks it may face, as well as those faced by its subsidiaries with total assets exceeding 5% of the Bank's total assets. As a result of the assessment, risks relating to subsidiaries were excluded from the assessment scope, as they did not meet the materiality threshold. In addition, risks such as wind pattern changes and landslides, which received very low risk scores, were not included in Table 2 – Halkbank Climate-Related Risks Table. Action plans currently in place or planned for implementation to address the risks deemed relevant to the Bank's climate change strategy and decision-making process are presented in Table 2. As sufficient data and forecasts are not yet available to quantify the financial impacts of climate-related risks and opportunities, these factors have been assessed qualitatively at this stage. The Bank has the infrastructure to manage this process effectively and develops action plans in line with the identified risks.

Based on the Bank's analysis, no climate-related risk or opportunity has been identified during the current financial reporting period that would require a material adjustment to the carrying amounts of assets and liabilities reported in the financial statements in the next financial reporting period. However, given the dynamic nature of climate-related risks and the potential for their impacts to change over time, the Bank's assessment processes are carried out on a regular basis, with new developments monitored closely.

Table 2. Halkbank's Climate-Related Risks Table

Risk	Description	Impact on Business Model & Value Chain	Projected Financial Impact	Action Plan	Relevant Priority Issue	Timeframe
Climate-Related Physical Risks						
Climate Change and Extreme Weather Events (Operations)	Extreme weather events (Fire, flood, storm, drought, etc.) may disrupt Bank operations and cause physical damage to critical infrastructure, including branches and data centers.	Bank Operations (Building and branch infrastructure, service infrastructure)	May lead to service disruptions, increased operational costs, and interruptions in customer transactions.	Halkbank has developed action plans to address climate change–related risks under its Business Continuity Emergency and Contingency Plan, designed for implementation within its operational processes. The relevant actions are being carried out under the plan. In emergency or unexpected situations, customers are informed via preprepared text messages and directed to an alternative branch or mobile teller to ensure the continuity of services.	Combating Climate Change and Environmental Compliance	Short Term
Climate Change and Extreme Weather Events (Portfolio)	Damages from extreme weather events (e.g. wildfires, floods, temperature fluctuations, and droughts) may lead to operational disruptions, difficulties in loan repayments, and a decline in collateral values.	Loan Portfolio	Losses resulting from extreme weather events can lead to difficulties in loan repayments and declines in collateral values, with potential adverse impacts on the Bank's financial performance.	By creating heat maps for all sectors, the Bank conducts portfolio-based analyses of its climate-related physical risks. In the detailed breakdown, the corresponding actions are specified as follows. Fire: Although wildfires are unlikely to cause major disruptions to the Bank's own operations, they may affect specific sectors represented in its portfolio. Halkbank incorporates measures and actions addressing all natural disasters—including those driven by climate change—into its Business Continuity Emergency and Contingency Plan. Flood: In regions with heightened flood risk, flexible repayment plans and financial support mechanisms are planned for affected individuals and businesses to mitigate financial losses. Temperature Change: To better understand potential impacts on the loan portfolio, analyses and assessments are planned for clients in sectors with high sensitivity to temperature change. Drought: To better understand potential impacts on the loan portfolio, analyses and assessments are planned for clients in sectors with high sensitivity to drought risk.	Combating Climate Change and Environmental Compliance	Short - Medium - Long Term

2.1. Halkbank's Approach to Sustainability and Climate Risks and Opportunities

Risk	Description	Impact on Business Model & Value Chain	Projected Financial Impact	Action Plan	Relevant Priority Issue	Timeframe
Climate-Related Transition Risks						
Climate-Related Reporting and Compliance Risk	Inadequate or inconsistent climate-related disclosures may result in reduced investor confidence, unmet stakeholder expectations, and potential regulatory sanctions.	Bank Operations (Compliance, data infrastructure, sustainability strategy)	Failure to adequately meet climate-related reporting standards and regulatory compliance requirements may expose the Bank to legal sanctions, result in a loss of transparency and credibility, and lead to reduced investor interest and customer confidence.	Within the framework of the Principles for Responsible Banking, all financial and non-financial reporting is carried out in reasonable compliance with national and/or international regulations.	Business Ethics, Regulatory Compliance, and Transparency	Short Term
Regulatory Compliance	National and international carbon emission regulations, particularly the CBAM, may adversely affect the financial performance of clients in relevant sectors financed by the Bank, leading to increased credit repayment risk and creating financial pressure on the Bank's loan portfolio and investment strategies.	Credit Policies, Risk Management, Lending Processes	The carbon costs and compliance obligations of clients operating in sectors covered by the CBAM may adversely affect their loan repayment capacity and competitiveness in external markets, putting pressure on the Bank's portfolio quality.	In relation to the CBAM, one of the international regulations, the Bank provides information to its clients through the SME Development Platform to support their green transition. Through the green finance instruments it offers, the Bank aims to accelerate this transition and help clients reduce their environmental impacts. In addition, companies operating in sectors covered by the CBAM are monitored, and impact analyses are conducted regarding potential exposure to additional taxes.	Impact of ESG in Lending Processes and Sustainable Finance	Medium Term

Risk	Description	Impact on Business Model & Value Chain	Projected Financial Impact	Action Plan	Relevant Priority Issue	Timeframe
Climate-Related Transition Risks						
Sustainable Energy	Delays in energy efficiency improvements and transition to sustainable energy sources may heighten dependence on conventional energy, increase the Bank's carbon foot-print, and hinder progress towards sustainability targets.	Bank Operations	The slow progress in the transition to renewable energy may lead to increased operational costs. Failure of borrowers to complete their green energy transitions on time may cause the Bank to deviate from its portfolio-based greenhouse gas emission reduction target.	Within the framework of Energy Management under Halkbank's Sustainability Policy, the Bank aims to continuously improve energy performance, minimize energy losses, and increase energy efficiency. Accordingly, the continuous reduction of energy consumption is targeted through energy saving and efficiency projects. In addition, as part of its energy-saving efforts, since 2023 the Bank has implemented a project to keep signage lighting in all branches switched off.* *Exceptions may apply based on geographical features and the locations of the branches.	Combating Climate Change and Environmental Compliance	Medium Term
Climate-Related Competitive Risk	Failure to respond to the growing demand for sustainable finance products and regulatory compliance may lead to customer loss, reputational damage, and reduced competitiveness in emerging markets.	Loan Portfolio	Failure to respond to customers' expectations for sustainability-related products and services may lead to a decrease in strategic partnerships and market losses.	Efforts are underway to develop innovative products and services focused on sustainability. Green financing, sustainable investment instruments, and ESG-aligned loan products will be diversified to meet customer expectations. Increasing technology investments and strengthening the use of digital banking and data analytics are planned to improve customer experience and maintain market share.	Sustainable Economic Performance	Medium Term

2.1. Halkbank's Approach to Sustainability and Climate Risks and Opportunities

Table 3. Halkbank Climate-Related Opportunities Table

Opportunity Area	2024 Opportunity Description	Impact on Business Model & Value Chain	Current and Planned Action	Timeframe
Low-Carbon Economy Adaptation Solutions	As updated regulations encourage businesses to develop environmentally friendly and sustainable products, companies undergo technological transformation and adopt greener production processes. This creates an opportunity to provide financing for green technologies and develop innovative solutions for clients requiring additional investment to transition to new, environmentally sensitive technologies.	**Business Model:** The increasing demand for financing to support the transition to a low-carbon economy, driven by regulatory requirements, presents a strategic opportunity for the Bank to diversify its product and service portfolio. **Value Chain**: Providing low-carbon economy adaptation Solutions helps clients reduce risks and build a sustainability-focused value chain.	By placing sustainability at the core of its business model, Halkbank uses green finance instruments to support renewable energy and energy efficiency initiatives, helping clients reduce their environmental impact. Through the Green Transformation and Sustainability Support Package, Halkbank offers seven different products that support the implementation of environmentally friendly and socially responsible projects. Renewable Energy and Energy Efficiency Investment Loan Green Workplace Investment Loan Green Certified Construction Project Loan Green Light Commercial Vehicle Loan Electric Vehicle Charging Station Loan Recycling Loan Support Loan for Sustainability Certification https://www.halkbankkobi.com.tr/tr/kobi/destek-paketleri/kobi-destek-paketleri/yesil-donusum-ve-surdurulebilirlik-destek-paketi.html	Medium Term
Carbon Footprint and Reduction	By pursuing net zero emissions, the Bank supports environmental sustainability while enhancing its reputation and strengthening its competitive advantage .	**Business Model:** Through investments in renewable energy and energy efficiency, the Bank reduces both operating costs and operational emissions. In addition, developing green financing products to lower portfolio-based emissions strengthens the Bank's ability to meet customer demand. **Value Chain:** By promoting greenhouse gas emission reductions across the value chain, the Bank lowers indirect emissions from its portfolio.	Aligned with its 2050 net zero commitment under NZBA and SBTi, the Bank has also set near-term reduction targets to drive progress.	Long Term
Environmental and Social Impact Investments	By investing in Environmentally and socially focused projects, the Bank generates not only financial returns but also social benefits.	**Business Model:** Through environmental and social impact investments, the Bank not only strengthens its financial performance but also enhances its social and environmental contributions, thereby reinforcing its position in sustainable finance. **Value Chain:** Financing environmentally and socially focused projects enhances the sustainability capacity of the loan portfolio while fostering the spread of positive environmental and social outcomes across the value chain.	Halkbank supports groups with limited access to finance—such as tradespeople, artisans, women, and young entrepreneurs—as well as environmentally friendly investments through dedicated financing opportunities.	Medium Term
Expansion of Electric Mobility	Supporting the adoption of electric vehicles is essential to decarbonizing the transportation sector.	**Business Model:** The growing demand for electric vehicles enables the Bank to expand its green loan portfolio by financing sustainable transportation solutions. **Value Chain:** The promotion of electric vehicles supports the sustainable transformation of the broader ecosystem by encouraging the automotive and technology sectors to deliver low-carbon solutions.	The Bank has initiated the transition to electric vehicles within its General Directorate, with the full electrification of all building management service vehicles to be completed by 2024. In addition, dedicated electric vehicle loans are offered to foster the adoption of environmentally friendly transportation and to accelerate the shift towards a low-carbon economy.	Short Term

2.2. Impact of Climate Risks on Financial Planning

Halkbank evaluates sustainability-related risks and opportunities within the framework of its credit strategy and integrates them into its decision-making processes. In particular, risk analyses are carried out for companies operating in sectors with high climate-related risk, and customers likely to be affected by cross-border carbon regulations are closely monitored.

Taking into account environmental impacts and sustainable development opportunities, the Bank continues to expand its portfolio of green loan products. It plays a significant role in Türkiye's transition to a green and circular economy and develops financial models aligned with global sustainability standards. By promoting renewable energy investments and energy efficiency projects, Halkbank supports the transformation of businesses through its Green Transformation and Sustainability Support Package, while encouraging individuals to adopt sustainable solutions through eco-friendly vehicle and housing loans.

As a signatory to the NZBA and SBTi with a commitment to achieve net-zero emissions by 2050, Halkbank had its near-term targets, set in line with SBTi requirements, approved in 2024, providing a clear framework for its emissions reduction process. These steps accelerate the sustainable transformation of its loan portfolio and operations, while also engaging its customers in the process. For the reporting period, Halkbank has identified the current financial impacts of sustainability-related risks and opportunities on its financial position, financial performance, and cash flows as a short-term strategy to reduce operational costs, and as a long-term strategy to channel investments towards low-carbon projects.

3

Risk Management Framework

3. Risk Management Framework

As a financial institution that adopts a holistic approach to its business model and processes, Halkbank considers both financial and non-financial risks across its value chain. A structured risk management process is in place to identify, assess, prioritize, and monitor climate change–related risks. Inputs to this process include information from internal and external data sources, stakeholder feedback, sectoral sustainability analyses, regulatory requirements, and climate scenarios.

Parameters considered during the risk assessment process include potential financial impacts, reputational impacts, environmental and social effects, and regulatory compliance risks. The process covers not only the Bank's core business activities, but also its subsidiaries, supply chain, and financed projects, addressing both direct and indirect impact areas. The Bank aims to ensure that all risks are identified, assessed within short-, medium-, and long-term strategies, and evaluated in a broad financial context.

The Bank actively monitors and manages credit, market, and operational risks, as well as risks related to asset-liability management. Reports, scenario analyses, and stress test results prepared on risk management are reviewed regularly by the Audit Committee. Capital adequacy and liquidity ratios are set and reported in line with regulatory requirements. The effectiveness of internal rating systems is measured to ensure continuous monitoring of credit risks. Market risk is measured using internal models and maintained below defined limits, ensuring it remains at a level that can be covered by equity.

Risk assessments are carried out for new products and services, feedback is provided on outsourced service providers, and annual risk reviews are conducted. Risk management policies are regularly reviewed and revised where necessary. Income estimation models used for retail loan applications are subject to validation; models used for calculating Expected Credit Loss provisions under TFRS 9 are updated; and credit risk management models are continuously improved. These processes ensure that all risks are managed effectively and that the Bank's financial stability is maintained.

The integration of climate-related risks into Halkbank's existing risk management framework—covering both transition and physical risks—is coordinated by the Risk Management, Credit Policies, and Sustainability Departments.

Halkbank currently has a comprehensive risk management framework for managing all financial risks, primarily including credit, market, operational, and asset-liability management risks. In addition to managing credit, market, operational, and asset-liability management risks, the Bank analyses the potential impacts of the EU Carbon Border Adjustment Mechanism (CBAM) Regulation on companies with high carbon emissions and those exporting to the European Union. By the end of 2025, the financial risks that such companies may face if they exceed their annual carbon emission thresholds and become liable for carbon taxation will be assessed.

The Business Continuity Department continues to support the development of action plans to address operational risks arising from climate change under the Bank's Business Continuity Emergency and Contingency Plan. Details of these action plans are provided in Section **"2.1. Halkbank's Approach to Sustainability and Climate-Related Risks and Opportunities".**

Currently, the Bank allocates space in its data systems to record potential operational disruptions to banking activities caused by natural disasters linked to climate change (e.g. floods, landslides, forest fires) and their root causes. Data enhancement initiatives are underway to identify the underlying causes of these climate-related risks. In addition, the added value of ensuring the sustainable provision of customer services through digital channels—under the emergency and contingency plans—is also factored into these assessments.

3.1. Identification, Assessment, and Mitigation of Climate-Related Risks

In line with the TSRS and industry best practices, the Bank applies a structured approach to identifying and assessing climate-related risks. Taking its science-based targets into account, the Bank aims to implement the necessary actions to address both the direct and indirect risks and opportunities associated with climate change. Accordingly, the following steps are implemented to identify climate-related risks.

- Designing and implementing the Climate-Related Risk Management System
- Establishing climate-related risk management policies and procedures, and ensuring adherence to these policies
- Monitoring the adequacy and effectiveness of the systems in place
- Identifying, measuring, assessing, and reporting climate-related risks to which the Bank is exposed, on both consolidated and non-consolidated bases

To ensure that these risks are evaluated effectively within a sound governance structure, efforts continue to integrate the relevant committees and senior management into the process.

3.1.1. Inputs and Parameters Used in Sustainability

Halkbank assesses ESG risks effectively by leveraging comprehensive data sources and analytical methods in its sustainability management processes. The key inputs and parameters used in this context are as follows:

- **Data Sources:** The Bank draws on both internal and external data sources to measure and evaluate its sustainability performance. Internal sources include data on operational energy consumption, water usage, waste management, and carbon footprint, while external sources include reports from regulatory bodies, sustainability indices, and sustainability reports.
- **Operational Scope:** The Bank's sustainability strategy covers all operational processes, including Headquarters, regional coordination offices, branches, and subsidiaries.
- **Climate Risk and Financial Impacts:** To enhance its assessments of the financial impacts of climate change, the Bank plans to adopt NGFS scenarios under the TCFD (Task Force on Climate-Related Financial Disclosures) framework in the coming period and to conduct stress testing within this scope. These efforts aim to deliver comprehensive analyses that take into account global and national climate data, emissions reduction targets, and market variables.
- **Social and Governance Parameters:** Factors such as workforce diversity, equality policies, customer and stakeholder satisfaction, and ethical management principles are among the key parameters used to measure sustainability performance.

The Bank regularly reviews all data and parameters used in its sustainability processes to ensure alignment with evolving regulations and sector expectations. Detailed metrics on Halkbank's sustainability performance, along with year-on-year comparative performance tables, are presented in the *Performance Tables* section of the 2024 Integrated Annual Report. In this context, all quantitative data relating to the performance indicators set out under TSRS 2 are publicly available in the report. You can access the relevant report *here.*

By embracing its sustainability objectives, Halkbank creates value through active collaboration with all stakeholders. In defining its strategies and priorities, the Bank considers global trends, international recommendations, and stakeholder feedback. This year, the Sustainability Committee and working groups identified the key stakeholder groups to contribute to the report, as well as the Bank's priority sustainability topics. As part of this process, surveys covering 13 topics were conducted with both internal and external stakeholders. The responses were analyzed to produce the 2024 Prioritization Matrix, details of which are provided in the *Halkbank's Priority Topics and Prioritization Analysis* section of the 2024 Integrated Annual Report.

After determining its priority topics, Halkbank mapped its climate-related risks to these priorities and, through risk workshops involving various internal departments, assessed the impacts, nature, likelihood, and magnitude of these risks. This work resulted in a comprehensive risk and opportunity analysis, providing more detailed explanations of the Bank's operations and processes.

3.1.2. Climate-Related Financial Risk Management

In managing its financial risk processes, Halkbank adopts an integrated risk management approach that incorporates climate-related risks through robust analytical methods, a solid data infrastructure, and innovative modelling techniques. This enables rapid adaptation to changing market conditions and environmental factors, with the aim of achieving sustainable growth.

The Bank takes the necessary steps to ensure that its risk management processes are aligned and integrated with its climate risk strategies. Among its priorities are expanding existing sectoral risk appetite indicators to include carbon-intensive sectors and preparing internal and senior management reports accordingly.

3.1. Identification, Assessment, and Mitigation of Climate-Related Risks

Today, identifying, analyzing, and effectively managing climate-related risks is becoming increasingly critical for sustainable finance. With this awareness, the activities of companies applying for loans are assessed in relation to sustainability and climate-related risks. The Company Rating Reports (CRRs) prepared for loan applicants include a “Sustainability and Environment” questionnaire designed to measure companies’ ESG performance. Companies’ performance on the Sustainability and Environment questionnaire has a direct impact on their creditworthiness. Furthermore, the questionnaire is regularly updated in line with national and international developments to enhance its effectiveness.

In line with the Bank’s Credit Strategies, ESG risk analysis is prioritized in credit assessment and allocation processes, particularly for investment loans. For investment loan applications exceeding a certain project value, an Environmental, Social and Governance (ESG) Impact Assessment Report may be commissioned—if high ESG risk is identified—either from an independent consultancy or from the Bank’s own team of experts.

3.1.3. Climate-Related Risk Assessment Methods

Stringent environmental regulations aimed at reducing carbon emissions, the need for rapid adaptation to new technologies, and shifting consumer preferences can lead to asset devaluation and increased financial liabilities, particularly in sectors dependent on fossil fuels. During the transition to a low-carbon economy, climate-related transition risks—such as regulatory changes, technological transformations, market fluctuations, and evolving societal expectations—can have material financial consequences. These risks have a broad impact on the financial sector, posing threats to banks ranging from credit portfolios to capital adequacy. However, when effectively managed through sound strategies, they can also present new opportunities. Thorough risk analysis and proactive adaptation are therefore critical to sustainable economic growth. Moreover, such risks can indirectly affect the economy by disrupting macroeconomic stability.

Currently, climate-related risks identified as material by the Bank are measured using systematic methodologies. Their management also takes into account national and international policy developments, including Türkiye’s 2053 Net Zero Emissions target, the European Green Deal, the Climate Law, and preparations for the Emissions Trading System. The Bank also closely monitors sectoral practices to ensure a comprehensive assessment of these risks. To manage climate-related risks at the portfolio level, tools such as heat maps, stress testing, and scenario analysis are utilized.

In addition, work is ongoing to develop both quantitative and qualitative scenarios for potential financial risks arising from climate change. This includes analyzing the potential impacts of identified physical and transition risks on the Bank’s capital and liquidity, with the aim of assessing these risks from a broader perspective.

Heat Map Analysis

The heat map study—the first step in assessing climate-related risks—provides a sector-based overview of potential exposures. It examines the sensitivity of sectors within the Bank’s portfolio to climate change, considering both physical and transition risks. **Physical risks** refer to those arising directly from the impacts of climate change and are assessed under two subcategories: acute risks (such as floods, droughts, landslides, and wildfires) and chronic risks (including changes in wind patterns and temperature shifts). **Transition risks**—comprising direct and indirect emission costs, low-carbon investment expenditures, and revenue impacts—cover the financial and operational challenges an organization may face when reducing its greenhouse gas emissions. These risks are linked to factors such as regulatory changes, market dynamics, and technological transformation. In preparing the study, international regulatory frameworks (e.g., **UNEP FI, TCFD**) were used as references, and various banking practices were reviewed. Climate resilience was also considered, with risks and opportunities analyzed comprehensively and discussed in relevant subcommittees. Climate-related uncertainties—such as data gaps and forecasting challenges—were taken into account, and measures were developed to enhance the flexibility and adaptability of the Bank’s strategy. These measures include developing green products, increasing the share of renewable energy sources in the portfolio, and using tools such as stress testing to strengthen institutional climate resilience.

The heat map analysis covered the Bank’s entire cash loan portfolio—excluding retail loans—using a five-point risk scale (1 = low risk, 5 = high risk) based on defined assumptions. Sectoral assessments were carried out using NACE codes and the Bank’s internally developed Activity Area Codes for each company’s primary business line. Based on these, transition and physical risk heat maps were created for each primary activity, with the results feeding into stress testing analyses.

As part of the heat map study assessing the impact of climate risks on the credit portfolio, the potential maximum impacts (5 – High) of each transition and physical sub-risk on the portfolio were calculated. This analysis provides critical data for better understanding and managing the potential financial impacts of climate risks.

The studies identified the following as the highest risks to the portfolio within the **transition risks** sub-category:

- 3.7% from direct emission costs,
- 3.9% from indirect emission costs,
- 3.4% of low-carbon investment expenditures
- 4.5% of revenue items

Highest risks to the portfolio within the **physical risks** sub-category:

- 1.6% from floods,
- 4.9% from drought,
- 0.8% from the change in wind patterns,
- 2.5% from landslides,
- 0.2% from temperature changes,
- 2.1% from wildfires.

The Bank’s heat map methodology revealed that climate-related risks are generally concentrated in transition risks, with no assets currently classified as highly vulnerable to climate risks. Accordingly, in 2024, the Bank conducted stress testing and scenario analysis specifically focused on the CBAM, identified as the most significant transition risk for the Bank.

Stress Testing and Scenario Analyses

As part of its ICAAP and broader risk management activities, Halkbank conducts scenario analyses and stress tests. These aim to assess the potential capital and loss impacts of climate-related risk factors on its financial portfolio, trading accounts, market value, liquidity, and operational risks. In particular, stress testing is carried out to observe the potential impact on the Capital Adequacy Ratio (CAR) of portfolios expected to be affected under the Carbon Border Adjustment Mechanism (CBAM) regulation and the Bank’s heat map analysis, based on the credit risk implications for these portfolios.

The results of stress tests and scenario analyses are taken into account when projecting the Bank’s financial statements in the annual budget process and are used to inform the Strategic Plan.

Focusing on CBAM, which is expected to have the most significant financial impact among climate-related transition risks, the Bank identified customers with concentrated exposure to this risk. Based on the assumption that these customers’ financial structures may weaken once CBAM is fully implemented, the Bank assessed potential impacts on its operations. In this analysis, international transfers via Halkbank—and the proportion originating from EU countries—were considered, and customers with NACE codes subject to carbon regulation were identified.

Companies expected to be affected by CBAM were evaluated under three distinct scenarios, with the impact on the CAR assessed based on changes in the credit portfolio’s risk-weighted asset composition. In defining the relevant credit exposures, loans to Tradesmen and Craftsmen Credit Cooperatives (ESKKK) and retail loans were excluded. It was assumed that after loans were transferred to non-performing status, provisions were allocated and collateral positions remained unchanged. The scenarios were as follows:

1. All companies in CBAM-affected sectors are transferred to non-performing status due to deteriorating financial conditions,
2. Companies with relatively low behavioral scores in CBAM-affected sectors are transferred to non-performing status.
3. The top three companies with the highest credit risk, along with their corporate groups, are transferred to non-performing status.

3.1. Identification, Assessment, and Mitigation of Climate-Related Risks

Under the first scenario, the introduction of the carbon tax obligation is expected to weaken the financial position of the companies concerned. Should these companies be transferred from Halkbank's performing loan portfolio to non-performing status, the capital adequacy ratio is projected to experience **a limited negative impact.**

Under the second scenario, assuming that companies operating in CBAM-affected sectors with relatively low behavioral scores, as determined by the Bank, are transferred to non-performing status, the impact on the capital adequacy ratio is expected to be **very limited and negative.**

Under the third scenario, if the three highest-credit-risk companies operating in CBAM-affected sectors, together with their corporate groups, are transferred to non-performing status, the capital adequacy ratio is expected to experience **a limited negative impact**.

In addition, the CBAM impact analysis examined liquidity risk by modelling a scenario in which deposits held by customers exposed to climate-related transition risk are withdrawn from the Bank. It was assumed that the resulting funding gap would be closed through secured borrowing. In this case, the impact on the **"FX" Liquidity Coverage Ratio (FX LCR) was low,** and **the impact on the total liquidity coverage ratio (TRY + FX LCR) was very low.**

All scenarios used inputs based on the credit portfolio, internal rating scores, NACE classifications, and applicable regulatory frameworks. A deterministic scenario approach was adopted, and the potential effects on the CAR were analyzed both qualitatively and, to a limited extent, quantitatively, while considering inherent uncertainties and limitations in the assumptions.

In addition, customers assessed as “high risk” (score of 5) under at least one physical and one transition sub-risk in the heat map analysis, and identified as having low behavioral scores, were included in a separate stress test. As of the reporting date of 31 December 2024, the impact on capital adequacy ratios was analyzed based on changes in the risk-weighted asset composition of the credit portfolio under two different scenarios: Among the companies labeled:

Scenario 1: Transfer of customers with low behavioral scores to non-performing status, with recalculation of their risk-weighted asset (RWA) amounts.

Scenario 2: Transfer of the top three highest-credit-risk customers (and their corporate groups) with low behavioral scores to non-performing status, with recalculation of their RWA amounts.

The additional RWA generated under each scenario was applied to the pre-scenario Credit Risk-Weighted Assets (CRWA) and changes in provisioning were reflected in the relevant equity items to determine the CAR impact. In both scenarios, the CAR impact was limited and negative.

For customers assessed as high risk under the heat map analysis and identified as having low behavioral scores, transferring them to non-performing status was calculated to have **a limited negative impact on the capital adequacy ratio.** In the case of transferring the top three highest-credit-risk companies among these customers—together with their corporate groups—to non-performing status, the **capital adequacy ratio** was likewise observed to be subject to a **limited negative impact.**

Overall, based on these scenarios and assessments, the Bank is considered resilient to climate-related risks in terms of credit, liquidity, market, and operational risks. According to the results, the Bank's current financial position is not expected to be materially affected by these risk events in the short, medium, or long term.

3.2. Prioritization and Monitoring of Risks

In addition to providing a detailed qualitative explanation in the 2024 ICAAP report, the Bank considers that its Risk Appetite Statement metrics can be enhanced to encompass environmental and social risks alongside climate risk. Given that climate risk analysis is an evolving field, the Bank plans to evaluate appropriate prioritization methodologies as an outcome of its stress testing activities and, accordingly, determine the related capital requirements. Within this scope, the significance of a risk can be determined through the following mechanisms:

- Portfolio heat map results
- Sustainability and Environment Assessment scores
- Climate risk stress tests
- Risk appetite thresholds planned for development in relation to climate-related risks

Looking ahead, the Bank aims to achieve the following objectives by gradually enhancing its existing data infrastructure:

- Collecting and consolidating climate-related risk data from portfolios across the Bank
- Periodically monitoring climate-related financial risks and providing reports that support effective decision-making by senior management

In addition, the Bank evaluates the potential impact of increasing frequency of extreme weather events associated with climate change on the housing finance sector. In particular, it is recognized that acute physical risks—such as heavy rainfall and flooding—and other chronic physical risks linked to climate change have the potential not only to reduce the value of underlying assets but also to cause payment delays and loan defaults.

3.3. Compliance with Global Risk Management Frameworks

Halkbank's corporate risk management strategy is developed in line with international risk management standards and best practices. In keeping with its commitment to responsible banking, all financial and non-financial reporting is carried out **in compliance with national and/or international regulations.**

Given the multi-faceted and dynamic nature of risks, the Bank monitors developments in financial markets and regulatory requirements on a regular basis, updating its management strategies accordingly. In the event of changes to international reporting standards, Halkbank takes a proactive position, building capacity through staff training and, where deemed necessary, obtaining consultancy services.

3.4. Integration of ESG Risks into Enterprise Risk Management (ERM) Processes

Halkbank integrates ESG risks into its ERM framework, adopting a sustainability-focused approach to risk management. ESG risks are assessed in conjunction with traditional risk categories—such as credit risk, market risk, operational risk, and reputational risk—to enable a holistic evaluation.

Through its forthcoming **"Halkbank Climate Change Action Plan**," the Bank aims to identify climate-related risks and opportunities and incorporate them into its business processes. As part of **this plan**, it has reviewed and updated its processes for assessing and prioritizing climate- and sustainability-related opportunities. To enhance internal processes, the responsibilities of relevant departments have been defined, and periodic monitoring mechanisms have been established in line with the Bank's sustainability objectives.

At the same time, the Bank promotes the green transition by assessing the risks and opportunities arising from the climate crisis and continues to advance energy efficiency initiatives through the use of renewable energy sources and the adoption of electric vehicle technologies. In this context, ESG factors are incorporated into credit allocation processes, investment decisions, and portfolio management. Scenario analyses and stress tests are conducted to evaluate the Bank's long-term resilience.

The Bank remains committed to monitoring and assessing ESG risks to ensure compliance with evolving regulatory frameworks and to continuously improve its risk management processes.

4

Metrics and Targets

4.1. Sustainability and Climate-Related Metrics and Performance Indicators

Halkbank manages its sustainability and climate strategy within a framework of concrete targets and measurable indicators. The Bank defines its sustainability and climate-related metrics in detail, ensuring alignment with the TSRS framework, the VRF Integrated Reporting Framework, and GRI Standards. Relevant quantitative and qualitative data are presented in the *Performance Tables* section of the Halkbank 2024 Integrated Annual Report.

4.2. Sector-Based ESG Metrics (Compliance with SASB, GRI, or Other Standards)

When determining its metrics and targets, Halkbank analyzed the applicability of the disclosure topics recommended by SASB to assess sector-specific priority issues. Disclosure topics deemed inapplicable were excluded from the scope of the report, with the rationale provided based on the Bank's sector of operation and level of impact. In line with this analysis, the Bank monitors and reports performance indicators relating to environmental impact and resource use, including greenhouse gas emissions, energy consumption, water usage, waste management, and renewable energy investments.

Halkbank regularly monitors its progress toward these targets, takes the necessary actions accordingly, evaluates related risks and opportunities, and implements strategic measures to ensure compliance with regulations. The status of progress against targets and the actions taken are presented in *Table 4.*

4.2. Sector-Based ESG Metrics (Compliance with SASB, GRI, or Other Standards)

Table 4. 2024 Targets

Absolute / Intensity	Metric	Target	Base Year	Target Year	Progress in 2024	Action Plan
Intensity Target	The share of SME segment loans in the total loan portfolio (%)	By 2026, increase the share of SME segment loans—extended to customers classified as SMEs under the legal definition—in the total commercial loan portfolio (cash + non-cash) to 50%.	-	2026	48.3%	Halkbank continuously works to meet the needs of SMEs—one of the key pillars of Türkiye's productive economy—through fast, effective, and high-quality Solutions, thereby enabling them to contribute more to the national economy. To this end, the Bank pursues a strategy of enhancing cooperation with regional development agencies and increasing the volume of loans disbursed through KOSGEB and the Credit Guarantee Fund (KGF).
Absolute Target	Emission amounts (in tonnes of CO_2e)	Reduce Scope 1+2 emissions by 50.4% by 2032*	2021	2032	0%	Electricity consumption, one of the largest sources of operational emissions, is planned to be supplied from renewable energy sources.
Absolute Target	Electricity generation emission intensity (tonnes CO_2e/ MWh)	By 2032, reduce emissions from electricity generation activities financed through project finance loans in the credit portfolio by 52.6% per MWh.*	2021	2032	77.9%	The Bank plans to continue financing activities that support the green transition of industries.
Absolute Target	Emission intensity of other electricity generation activities (tonnes CO_2e/MWh)	By 2032, reduce the emission intensity of other electricity generation activities in the loan portfolio by 73.8% per MWh."	2021	2032	92%	
Absolute Target	Emission intensity of commercial real estate (tonnes CO_2e/m^2)	By 2032, reduce the emission intensity of commercial real estate in the loan portfolio by 60% per square meter.*	2021	2032	12.3%	

* Approved by SBTi.

Table 5. Metrics and Targets

2024 Metrics and Targets	Progress in 2024	Future Metrics and Targets	Business Unit Covered by the Target	Action Plan
Completing the electrification of building management service vehicles.	The electrification of building management service vehicles has been completed.	Target has been achieved.	Bank	
To increase the share of green investments in total investment loans to 25%.	As of the end of 2024, the share of green investments within investment loans stood at 16.51%.	Target maintained.	Bank	Halkbank plays a critical role in Türkiye's transition to a green and circular economy by developing financial models aligned with global sustainability standards. Through its Green Transformation and Sustainability Support Package, the Bank supports businesses in advancing their green transition.
To ensure that all Halkbank subsidiaries obtain certification in accordance with ISO 14001 and ISO 50001 standards	Halk GYO (REIT) and Halk Yatırım (Investment), two of the Bank's subsidiaries, have obtained certification in accordance with ISO 14001 and ISO 50001 standards.	Target maintained.	Subsidiaries	As of 2025, efforts have been initiated to obtain ISO 14001 and ISO 50001 certification for all subsidiaries.
To increase the Bank's CDP Climate Change score to the A level.	The CDP Climate Change score was achieved at the A level.	To achieve an "A" score in the CDP Climate Change and Water Security mod-ules.	Bank	Efforts will be initiated to improve the Bank's 2024 A– score in the CDP Water Security module to the A level.

4.3. Greenhouse Gas (GHG) Emissions

Scope 1, Scope 2, and Scope 3 emissions have been calculated in line with the Greenhouse Gas Protocol under the operational control approach. This method was selected as the Bank has full authority to manage emission sources, make operational decisions, and determine environmental performance.

For Scope 1 emissions, CO_2 equivalent factors were applied to emissions from CO_2, CH_4, N_2O, HFCs (refrigerant gases), and fire extinguishing agents. Scope 2 emissions were calculated based on purchased electricity consumption, using emission factors applicable to Türkiye (kg CO_2e/kWh). Although the banking sector is not directly carbon-intensive, the majority of operational emissions arise from electricity consumption (Scope 2). Scope 3 emissions cover indirect emissions from employee commuting, business travel, accommodation, remote working, water consumption, paper usage, and the disposal of collected waste. These were calculated using activity-specific emission factors (e.g., CO_2e per kilometre, CO_2e per litre). Scope 1 and Scope 2 emissions are disclosed on a consolidated basis, including all subsidiaries.

Scope 3[2] emissions, however, are reported only for the Bank itself in 2024, in line with the exemption granted for that year. Further details on emission calculations are provided in the Reporting Guidelines section of the 2024 Integrated Annual Report, which can be accessed using *this link.*

Table 6. Absolute Greenhouse Gas Emissions (Gross)

Scope 1 (tCO_2e)	22,628,67
Scope 2 (tCO_2e)[3]	38,392,74
Scope 3 (tCO_2e)	18,700,06

[2] In assessing climate-related financial impacts and greenhouse gas emissions, the Bank relies on estimated data based on relevant assumptions and modelling rather than direct measurements. Although the methodologies applied are consistent with international standards, it should be noted that reported figures may be subject to estimation variances depending on data sources and methodological choices. Accordingly, efforts are underway to improve data quality, enhance verification mechanisms, and strengthen transparency in calculation methodologies in order to reduce measurement uncertainty.
[3] As no I-REC certificates were available, emissions from electricity consumption were calculated using the location-based method.

4.4. Internal Carbon Pricing and Its Impact on Financial Planning

With regard to shadow carbon pricing, Halkbank is developing an internal carbon pricing mechanism to assess and manage climate-related transition risks. The internal carbon price is determined based on the Bank's operational energy consumption, particularly electricity use across its branches. Under the Energy and Natural Resource Management System (EDYS), the Bank calculates the total energy consumption of its branches and then determines per capita energy consumption (kWh). This figure is multiplied by the unit electricity price to derive the shadow price applied in internal carbon pricing studies. Actions are planned to further develop the internal shadow pricing framework within the Bank.

The Bank does not purchase carbon credits for carbon offsetting.

4.5. Sustainability and Climate Targets

As part of its management of climate-related risks and opportunities, the Bank has set targets such as increasing the share of green investments, reducing carbon emissions, and integrating environmental risk management. These targets are updated annually in line with the Bank's credit strategies and are implemented at the Head Office level. Progress is monitored quarterly, with related metrics included in the Bank's internal performance reports. Some of these indicators are embedded as performance criteria in the remuneration policies of senior executives and carry specific weightings in the calculation of annual bonuses. In this way, the Bank directly links its governance mechanisms with sustainability objectives.

4.5.1. Science-Based Targets on the Road to Net Zero

In 2022, Halkbank joined the NZBA (Net-Zero Banking Alliance), committing to reach net zero emissions by 2050. In line with this commitment, near-term emission reduction targets defined under the SBTi (Science Based Targets initiative) framework were approved in 2024, establishing a science-based and concrete roadmap for the Bank's emission reduction efforts.

Clarifying this framework has accelerated the Bank's sustainable transformation across both its credit portfolio and operations, while also engaging its clients in the process. To strengthen its sustainable finance model, the Bank has defined performance indicators aimed at reducing the carbon intensity of its loan portfolio and monitors progress through regular reporting.

SBTi

In line with its science-based targets, Halkbank aims to reduce its absolute Scope 1 and 2 greenhouse gas emissions by 50.4% by 2032, using 2021 as the base year.

The Bank has also set concrete targets for reducing Scope 3 emissions at the asset class level. Accordingly, it aims to lower GHG emissions in its real estate loan portfolio by 60% per square meter by 2032, compared to 2021 levels.

In the area of electricity generation financing, Halkbank targets a reduction in GHG emissions of 52.6% per MWh in its electricity generation project finance portfolio, and 73.8% per MWh in emissions from loans to the electricity generation sector within its corporate loan portfolio.

Furthermore, the Bank is committed to lowering the Scope 1 + 2 portfolio temperature score for its long-term corporate lending, listed equity, corporate bond, and private equity portfolios from 3.2°C in 2021 to 2.67°C by 2028, and the Scope 1 + 2 + 3 portfolio temperature score from 3.2°C in 2021 to 2.76°C by 2028.

NZBA

As of June 2022, Halkbank became a member of the Net-Zero Banking Alliance (NZBA), committing to achieve net-zero emissions across its entire lending and investment portfolio by 2050.

To support this long-term ambition, the Bank set near-term emission reduction targets in line with NZBA guidelines and reported them to the Alliance. In setting these targets, the Bank also took into account Türkiye's 2053 Long-Term Climate Strategy and its sectoral objectives.

With the inclusion of newly added sectors, the Bank's near-term targets and 2023 progress status for the sectors it has committed to reducing emissions are provided below:

- Electricity generation portfolio emissions are targeted to be reduced by 46% per MWh by 2030 compared to the 2021 base year level of 0.706 tCO_2eq. As of the end of 2023, a 37.2% reduction compared to the base year has been achieved.
- Commercial real estate portfolio emissions are targeted to be reduced by 53% per m^2 by 2030 compared to the 2021 base year level of 0.059 tCO_2eq. As of the end of 2023, a 16% reduction compared to the base year has been achieved.
- Cement portfolio emissions are targeted to be reduced by 15% per ton of cement by 2030 compared to the 2021 base year level of 1.099 tCO_2eq. As of the end of 2023, a 5% reduction compared to the base year has been achieved.
- Iron and steel portfolio emissions are targeted to be reduced by 10% per ton of cement by 2030 compared to the 2021 base year level of 0.840 tCO_2eq. As of the end of 2023, a 4% reduction compared to the base year has been achieved.

In setting these targets, Halkbank considered a range of climate scenarios, global and national datasets, international expectations, and Türkiye's 2053 net-zero strategy. The Bank will continue to review its targets regularly and disclose progress transparently. In addition, it aims to improve data quality in emission calculation processes to ensure more accurate, transparent, and reliable results.

4.5.2. Accountability and Monitoring of Climate Targets

Halkbank reinforces its commitment and responsibility to a sustainable future through its Climate Transition Plan. This plan has been designed to minimize the Bank's environmental impact and to fulfil its role in combating climate change. In line with its 2050 net zero emission target, the Bank seeks to make both its operations and its loan portfolio more resilient to climate-related risks. Within this framework, tangible actions in energy efficiency, waste management, and carbon footprint reduction are closely monitored. In addition, under the Bank's Integrated Management System, the environmental impacts of operational activities are regularly monitored, and improvement actions are implemented where development opportunities are identified. Accordingly, in 2024, approximately TRY 35 million was invested to reduce environmental impacts.

To further reduce its environmental footprint, the Bank integrated the Zero Waste Regulation into its operations in 2019 and has since introduced measures to reduce plastic waste across all service locations. It has also established Türkiye's first LEED-certified Green Data Center with innovative energy efficiency solutions, and has integrated the ISO 14001 Environmental Management System and the ISO 50001 Energy Management System into its business processes. Furthermore, the Bank's Head Office building has been awarded LEED Platinum certification.[4]

In 2022, Halkbank joined the Net-Zero Banking Alliance (NZBA), founded by the United Nations Environment Program Finance Initiative (UNEP FI), committing to align its entire lending and investment portfolio with the goal of net zero emissions by 2050. At the same time, the Bank continues to assess climate risks in the sectors within its portfolio, foster sustainable investments, and promote the green transition.

Halkbank also aims to expand its range of products and services to support the economic participation of women and young entrepreneurs. The Bank's sustainability policies are integrated across the entire supply chain, taking into account both environmental and social impacts, and are shaped in line with its sustainable finance approach.
Details on the current status of the Bank's sustainability and climate targets can be found in the ***METRICS AND TARGETS*** section.

[4] This took place in 2025, after the reporting period.

TSRS 2-Appendix Volume-16 Commercial Banks Metrics

Activity Metric	Checking and Savings Accounts	Quantity	Value (thousand TL)
By segment: number and value of personal and small business checking and savings accounts	Individual	28,833,620	1,058,189,050
	Small Business*	6,889,552	308,171,671

Activity Metric	Loans	Quantity	Value (thousand TL)
By segment: number and value of individual, small business, and corporate loans	**Individual**	4,095,585	96,048,790
	Small Business*	2,298,336	593,550,094
	Corporate	42,414	470,646,224

*The scope of small businesses is defined within the framework of legal SME criteria.

TSRS Compliance Table

Subject Matter	Standard	Report Section	Title
Governance	TSRS 1 27	Management of Risks and Opportunities	1.1. Approach to Sustainability and Climate Risks and Competence of Responsible Persons 1.2. Integration of the Three Lines of Defense 1.3. Involvement and Expertise of Senior Management in Sustainability Governance
	TSRS 2 6	Management of Risks and Opportunities	1.1. Approach to Sustainability and Climate Risks and Competence of Responsible Persons 1.2. Integration of the Three Lines of Defense 1.3. Involvement and Expertise of Senior Management in Sustainability Governance
Strategy	TSRS 1 29	Impact on Strategy and Business Model	2.1. Halkbank's Approach to Sustainability and Climate Risks and Opportunities
		Risk Management Framework	3.1. Identification, Assessment, and Mitigation of Climate-Related Risks
		Metrics and Targets	4.5.2. Accountability and Monitoring of Climate Targets
	TSRS 1 30	Impact on Strategy and Business Model	2.1. Halkbank's Approach to Sustainability and Climate Risks and Opportunities
	TSRS 1 32	Impact on Strategy and Business Model	2.1. Halkbank's Approach to Sustainability and Climate Risks and Opportunities
	TSRS 1 33	Impact on Strategy and Business Model	2.1. Halkbank's Approach to Sustainability and Climate Risks and Opportunities 2.2. Impact of Climate Risks on Financial Planning
		Metrics and Targets	4.2. Sector-Based ESG Metrics (Compliance with SASB, GRI, or Other Standards)
	TSRS 1 38	Risk Management Framework	3.1.3. Assessment Methods for Climate-Related Risks 3.2. Prioritization and Monitoring of Risks
	TSRS 2 9	Impact on Strategy and Business Model	2.1. Halkbank's Approach to Sustainability and Climate Risks and Opportunities 2.2. Impact of Climate Risks on Financial Planning
		Risk Management Framework	3.1.3. Assessment Methods for Climate-Related Risks
	TSRS 2 10	Impact on Strategy and Business Model	2.1. Halkbank's Approach to Sustainability and Climate Risks and Opportunities
	TSRS 2 13	Impact on Strategy and Business Model	2.1. Halkbank's Approach to Sustainability and Climate Risks and Opportunities
	TSRS 2 14	Impact on Strategy and Business Model	2.1. Halkbank's Approach to Sustainability and Climate Risks and Opportunities
		Risk Management Framework	3.1.3. Assessment Methods for Climate-Related Risks
		Metrics and Targets	4.2. Sector-Based ESG Metrics (Compliance with SASB, GRI, or Other Standards) 4.5.2. Accountability and Monitoring of Climate Targets

Subject Matter	Standard	Report Section	Title
Strategy	TSRS 2 15	Impact on Strategy and Business Model	2.1. Halkbank's Approach to Sustainability and Climate Risks and Opportunities 2.2. Impact of Climate Risks on Financial Planning
	TSRS 2 16	Impact on Strategy and Business Model	2.1. Halkbank's Approach to Sustainability and Climate Risks and Opportunities 2.2. Impact of Climate Risks on Financial Planning
	TSRS 2 22	Impact on Strategy and Business Model	2.1. Halkbank's Approach to Sustainability and Climate Risks and Opportunities
		Risk Management Framework	3.1.3. Assessment Methods for Climate-Related Risks 3.3.2. Compliance with Global Risk Management Frameworks
		Metrics and Targets	4.4. Internal Carbon Pricing and Its Impact on Financial Planning 4.5.1. Science-Based Targets on the Road to Net Zero 4.5.2. Accountability and Monitoring of Climate Targets
Risk Management	TSRS 1 43	Risk Management Framework	3.1. Identification, Assessment, and Mitigation of Climate-Related Risks 3.2. Prioritization and Monitoring of Risks
	TSRS 1 44	Risk Management Framework	3.1. Identification, Assessment, and Mitigation of Climate-Related Risks 3.2. Prioritization and Monitoring of Risks
	TSRS 2 24	Risk Management Framework	3.1.2. Climate-Related Financial Risk Management
	TSRS 2 25	Risk Management Framework	3.1. Identification, Assessment, and Mitigation of Climate-Related Risks 3.1.1. Inputs and Parameters Used in Sustainability 3.1.2. Climate-Related Financial Risk Management 3.1.3. Assessment Methods for Climate-Related Risks 3.2. Prioritization and Monitoring of Risks 3.3. Compliance with Global Risk Management Frameworks 3.4. Integration of ESG Risks into Enterprise Risk Management (ERM) Processes

Subject Matter	Standard	Report Section	Title
Metrics and Targets	TSRS 1 46	Introduction	Sustainability risks, however, are not covered in this report due to the transitional exemption currently in place.
	TSRS 1 49	Metrics and Targets	4.1. Sustainability and Climate-Related Metrics and Performance Indicators
	TSRS 1 50	Metrics and Targets	4.1. Sustainability and Climate-Related Metrics and Performance Indicators 4.5. Sustainability and Climate Targets
		Halkbank 2024 Integrated Annual Report	Independent Assurance Report
	TSRS 1 51	Metrics and Targets	4.2. Sector-Based ESG Metrics (Compliance with SASB, GRI, or Other Standards) 4.5.1. Science-Based Targets on the Road to Net Zero
	TSRS 1 55	Metrics and Targets	4.2. Sector-Based ESG Metrics (Compliance with SASB, GRI, or Other Standards)
	TSRS 1 59	Metrics and Targets	4.2. Sector-Based ESG Metrics (Compliance with SASB, GRI, or Other Standards)
	TSRS 1 78	Risk Management Framework	3.1.3. Assessment Methods for Climate-Related Risks
	TSRS 2 28	Metrics and Targets	4.2. Sector-Based ESG Metrics (Compliance with SASB, GRI, or Other Standards)
	TSRS 2 29	Risk Management Framework	3.1. Identification, Assessment, and Mitigation of Climate-Related Risks 3.1.3. Assessment Methods for Climate-Related Risks
		Metrics and Targets	4.3. Greenhouse Gas (GHG) Emissions 4.4. Internal Carbon Pricing and Its Impact on Financial Planning
	TSRS 2 33	Metrics and Targets	4.2. Sector-Based ESG Metrics (Compliance with SASB, GRI, or Other Standards) 4.5. Sustainability and Climate Targets 4.5.1. Science-Based Targets on the Road to Net Zero
	TSRS 2 34	Metrics and Targets	4.5. Sustainability and Climate Targets 4.5.2. Accountability and Monitoring of Climate Targets
	TSRS 2 36	Metrics and Targets	4.2. Sector-Based ESG Metrics (Compliance with SASB, GRI, or Other Standards) 4.3. Greenhouse Gas (GHG) Emissions 4.5. Sustainability and Climate Targets

www.halkbank.com.tr
Halkbank Dialog 0850 222 0 400
Halkbank Corporate Dialog 0850 222 0 401