# Welcome to your CDP Water Security Questionnaire 2022

# W0. Introduction

## W0.1

**(W0.1) Give a general description of and introduction to your organization.**

Halkbank was established in 1938 to support tradesmen, and craftsmen and to accelerate permanent economic development and has become one of Turkey's steadily growing, well-established, pioneering, and respected brands. Pioneering the development of the Turkish banking sector for 83 years, the Bank continues to serve the real sector with its innovative products and services with a global vision, with 1,018 branches in the country and 5 abroad as of the end of 2021.

Halkbank aims for a livable world where economic, social, and environmental impacts are in balance in all areas where it creates value, especially in its own operations, and growth takes place without compromising these effects. In this direction, it shapes its work with the awareness that it is possible to move forward more strongly towards the future by focusing on sustainable economic, environmental and social development. In this context, it develops products such as the Green Energy Loan Package to support efforts to reduce carbon emissions through renewable energy and energy efficiency projects in order to direct investments to more sustainable technologies and businesses. This package, provides renewable energy investment, green workplace investment, energy efficiency, green-certified construction project, and green light commercial vehicle loans. In addition, it also offers free technical consultancy services for the efficient realization of investment in a way to benefit from the knowledge and experience of engineers with energy manager certificates. Going beyond just providing financial resources to companies the use of resources, while Halkbank works hard to produce innovative solutions for such demands and needs of its customers, it pays great attention to ensuring that its activities are compatible with factors such as environmental protection and energy efficiency. It continues to implement digitalization practices that will accelerate the transition to emission reduction, waste management, and paperless banking, minimizing the carbon footprint resulting from its operations. In line with this, Halkbank has certified all its service buildings, including its Head Office and branches, with the ISO 14001 Environmental Management System and

ISO 50001 Energy Management System, and becoming the first bank in the Turkish banking industry to establish and get certified in the ISO 50001 Energy Management System. It uses a program namely "İKLİM", which it has developed with its own internal resources, in order to manage, monitor, evaluate and report these systems by integrating the relevant environmental and energy management systems and implementing all the requirements. In addition, the Bank continues its waste reduction efforts with the principle of separating its wastes and zero waste within the responsible banking culture, taking into account waste management within the scope of reducing the environmental impacts of its activities. As of 2019, all service locations have complied with the Zero Waste System, and in 2021, 1,055 service locations, including all branches, received Zero Waste Certificates. Halkbank also continues to contribute to “Green and Circular Economy” issues, Turkey's green agreement harmonization process, and studies in this context with the initiatives it has developed under the umbrella of Sustainable Banking.
In addition, Halkbank has been reporting to the Carbon Disclosure Project, one of the public disclosure platforms, since 2013 due to the importance it attaches to the transparency of its operations and has been included in the BIST Sustainability Index since 2017. It is also committed to achieving net-zero by 2050 as one of the first signatories of the NZBA in Turkey by mid-2022.

# W0.2

### (W0.2) State the start and end date of the year for which you are reporting data.

| | Start date | End date |
|---|---|---|
| Reporting year | January 1, 2021 | December 31, 2021 |

# W0.3

### (W0.3) Select the countries/areas in which you operate.

Turkey

# W0.4

### (W0.4) Select the currency used for all financial information disclosed throughout your response.

TRY

## W0.5

**(W0.5) Select the option that best describes the reporting boundary for companies, entities, or groups for which water impacts on your business are being reported.**

Companies, entities or groups over which operational control is exercised

## W0.6

**(W0.6) Within this boundary, are there any geographies, facilities, water aspects, or other exclusions from your disclosure?**

No

## W0.7

**(W0.7) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?**

| Indicate whether you are able to provide a unique identifier for your organization. | Provide your unique identifier |
|---|---|
| Yes, a Ticker symbol | HALKB |
| Yes, an ISIN code | TRETHAL00019 |

# W1. Current state

## W1.1

**(W1.1) Rate the importance (current and future) of water quality and water quantity to the success of your business.**

| | Direct use importance rating | Indirect use importance rating | Please explain |
|---|---|---|---|

| | | | |
|---|---|---|---|
| Sufficient amounts of good quality freshwater available for use | Important | Important | i&iii) The reason for importance rating and future water dependency for direct use: Halkbank uses water directly to meet the clean drinking water needs of employees in its operations and to ensure the cleanliness of the branches. Also, the Bank is committed to protecting its employees' right to access clean water and providing a healthy working environment. Therefore, sufficient amounts of good quality freshwater availability are important and will continue to be important in the future since Halkbank operates in areas that are likely to experience water scarcity.<br><br>ii&iv) The reason for importance rating and future water dependency for indirect use: Water use is quite high in the production operations of Halkbank's suppliers that make up its value chain or in the activities of the customers to whom the Bank provides loans. Therefore, sufficient amounts of good quality freshwater availability are essential and will continue to be important in the future in indirect water use, since Halkbank's stakeholders operate in areas that are likely to experience water scarcity. |
| Sufficient amounts of recycled, brackish and/or produced water available for use | Neutral | Neutral | i&iii) The reason for importance rating and future water dependency for direct use: The use of recycled/manufactured water in Halkbank's direct operations is currently only possible in a very small portion of its branches. Reverse osmosis treatment systems have been installed in the kitchens of the Halkbank Headquarters Building and the Davutpaşa Assistant Headquarters Service Building to provide quality drinking water. For this reason, it was chosen as neutral because it is not of great importance yet. In the Bank's direct operations, there may be an increase in the use and importance of recycled/brackish water in the future as Halkbank continues to implement new technologies to reduce the use of fresh water in our branches.<br><br>ii&iv) The reason for importance rating and future water dependency for indirect use: In its indirect operations, some of Halkbank's suppliers and customers use recycled water where appropriate, such as on production lines. Therefore, importance was chosen as neutral. Also for indirect use, customers and suppliers will need to reduce their use of fresh water in the future due to water scarcity. In this case, Halkbank anticipates that circular water systems will |

| | | | |
|---|---|---|---|
| | | | be applied to several operations, which will increase the use of recycled/brackish water. For this reason, its importance is expected to increase in the coming years. |

# W1.2

**(W1.2) Across all your operations, what proportion of the following water aspects are regularly measured and monitored?**

| | % of sites/facilities/operations | Please explain |
|---|---|---|
| Water withdrawals – total volumes | 100% | Halkbank has been calculating its carbon footprint since 2013 as a part of its environmental management system. In order to monitor the data required for this account, the IKLIM software developed by the IT department of the bank has been used since 2019. Thanks to this software, 100% water usage levels of all Halkbank buildings in Turkey are measured in line with both the environmental management system and the water targets set. In addition, Halkbank aims to reduce and optimize water usage and increase water efficiency. Therefore, this parameter is monitored monthly, evaluated by the General Directorate at the end of the year, and verified by third parties in the annual reports. |
| Water withdrawals – volumes by source | 100% | Turkey is a country with a high risk of water stress and 82% of Halkbank's facilities are located in regions with high water stress. All of Halkbank's business units use the existing municipal resources of the municipalities where they are located. We follow where the municipalities withdraw water from according to the basins they are in and we know the amount of water used in our branches with monthly billings. Thus, Halkbank can follow its source of water withdrawal amounts on a basin basis. |
| Water withdrawals quality | 100% | All water used by Halkbank is drawn from municipal networks and the quality of the drawn water is constantly monitored by the municipalities. In addition, the quality of water drawn from basins and rivers to be treated by municipal administrations can be viewed online. As part of Halkbank's commitment to access clean and high-quality water, all information on water quality is monitored annually through these reports. |

| | | |
|---|---|---|
| Water discharges – total volumes | 100% | Municipal sewerage system is used for water discharge at all Halkbank facilities. The municipalities report the discharge volumes to the branches every month via invoices. In addition, Halkbank aims to reduce and optimize water use and increase water efficiency. For this reason, Halkbank monitors monthly discharge volumes from the monthly bills of municipalities. |
| Water discharges – volumes by destination | 100% | All Halkbank facilities across the country use the municipality's sewer system for water discharge, and each of these discharges is monitored separately by the administrative municipalities. Treated wastewater discharged from treatment plants can be monitored through the reports of both the municipality and the Ministry of Agriculture and Forestry. In line with the Sustainable Development Goals, Halkbank also annually monitors the use of watersheds broken down to ensure the quality and sustainability of water resources and wider ecosystems related to water. |
| Water discharges – volumes by treatment method | 100% | Wastewater discharges from all Halkbank branches are domestic and these wastewaters are discharged into sewer systems under the control of local municipalities. These wastewaters are treated in municipal water treatment plants in accordance with the Urban Wastewater Treatment Regulation. Methods implemented by wastewater treatment plants nationwide are available online on municipal and government websites. Halkbank follows these methods annually as it is committed to complying with local laws and obligations. |
| Water discharge quality – by standard effluent parameters | 100% | Water discharges to environments are of great importance. At Halkbank branches, wastewater is discharged directly into the sewerage system of municipalities and is treated in accordance with standards in treatment plants. Treated wastewater that has been discharged from treatment plants must be in compliance with the wastewater parameters of Regulation on Water Pollution Control and the Communique on Wastewater Treatment Plants Technical Procedures. This can be monitored through the municipalities' websites and monthly reports. Halkbank follows these methods annually as it is committed to complying with local laws and obligations. |
| Water discharge quality – temperature | 100% | Halkbank only discharges its wastewater into the sewer system of the municipality. Waste water is discharged at room temperature, which may vary slightly depending on seasonal weather conditions.Temperature is an important parameter of discharged wastewater. Therefore, it is |

| | | |
|---|---|---|
| | | monitored by treatment plants and municipalities while being discharged into the aquatic environment. Halkbank monitors the compliance of values from the annual reports of municipalities. |
| Water consumption – total volume | 100% | Halkbank's water use consists of cleaning, hygiene, and other domestic water needs equivalent to water drawn from the municipal network. In some regions, municipal water can be used as drinking water, and in places where municipal water is not used for drinking purposes, drinking water is purchased in the form of 0.5 liter recyclable PET bottles. In Ataşehir and Davutpaşa Headquarters Service Buildings and in some district buildings, drinking water is provided with reverse osmosis systems connected to the main line in order to reduce greenhouse gas emissions from plastic bottles and transportation. Halkbank aims to reduce and optimize water use and increase water efficiency. Therefore, this parameter is monitored monthly on billings of consumed and/or purchased water and evaluated by the General Directorate at the end of the year. |
| Water recycled/reused | Not relevant | There is no water recycling process throughout the company. A recycling system will be monitored when implemented. |
| The provision of fully-functioning, safely managed WASH services to all workers | 100% | Halkbank provides fully functional water disinfection and hygiene services to its employees. Such services are monitored and maintained by the support services department. The water usage levels of all buildings in Turkey are measured and reported as 100% in Halkbank's environmental management procedures with the İKLİM software. These reports are checked annually by the head office at the end of the year and verified by third parties. |

# W1.2b

**(W1.2b) What are the total volumes of water withdrawn, discharged, and consumed across all your operations, and how do these volumes compare to the previous reporting year?**

| | Volume (megaliters/year) | Comparison with previous reporting year | Please explain |
|---|---|---|---|

| | | | |
|---|---|---|---|
| Total withdrawals | 213.2 | About the same | Total water withdrawal is calculated as the sum of water withdrawn from the municipal water system and drinking water supplied from local suppliers in the form of 0.5 liter recyclable PET bottles. The total water withdrawal value in 2021 is 213.2 megaliters. While the discharge volume increased due to 10 branches opened in 2021, the decrease in water consumption as a result of the IT and call center departments working completely from home created a balance in the total water withdrawal value and no change was observed. Year-to-year changes in values between 5% and 15% are considered "high" or "low", and changes over 15% are considered "much higher" or "much lower" for bank operations. With the possible water efficiency projects that Halkbank can implement, this value is expected to decrease slightly. |
| Total discharges | 206.2 | About the same | The total discharge is directly related to the total withdrawals from the municipalities. The total water discharge volume, which was 202.3 megaliters in 2020, increased to 206.2 in 2021. Halkbank's return to pre-pandemic conditions with a hybrid system and the opening of 10 new branches resulted in an increase of 1.93% in the total discharge volume. Year-to-year changes in values between 5% and 15% are considered "high" or "low", and changes over 15% are considered "much higher" or "much lower" for bank operations. While accepting this change as almost the same, this value is expected to decrease slightly in the future with water efficiency applications. |
| Total consumption | 7.07 | Much lower | The total consumption is equal to the total water purchased for the consumption of the personnel. The total water consumption volume, which was 10.9 megaliters in 2020, increased to 7.07 in 2021. Although new personnel was recruited in 2021, there was a 35% decrease in water consumption as IT and call center units started working entirely at home. Year-to-year changes in values between 5% and 15% are considered "high" or "low", and changes over 15% are considered "much higher" or "much lower" for bank operations. While accepting this change as almost the same, this value is expected to decrease slightly in the future. |

## W1.2d

**(W1.2d) Indicate whether water is withdrawn from areas with water stress and provide the proportion.**

| | Withdrawals are from areas with water stress | % withdrawn from areas with water stress | Comparison with previous reporting year | Identification tool | Please explain |
|---|---|---|---|---|---|
| Row 1 | Yes | 76-99 | About the same | WRI Aqueduct | Halkbank uses the WRI Aqueduct Tool to evaluate many water-related parameters such as the quality and quantity of the regions where it operates while performing water management as part of its environmental management. One of the most important parameters that this tool looks at is water stress. While it is predicted that Turkey's water stress will gradually increase, Halkbank analyzed the current stress situations specific to the provinces and therefore included extremely high and high-risk activities in its assessment and calculated it as 82%. The WRI tool is used with the function of imported and exported excel data sheets for the water stress areas, then the withdrawal volumes from stressed areas to total withdrawals are calculated. Since the majority of the regions where Halkbank operates are currently in high-risk regions, it is anticipated that the recently stated percentage will remain approximately the same. When the rate of water withdrawn from regions with extremely high and high water stress risk is compared to last year, it has been observed that there is no change and we anticipate that this amount will decrease in the coming years. |

# W1.2h

**(W1.2h) Provide total water withdrawal data by source.**

| | Relevance | Volume (megaliters/year) | Comparison with previous reporting year | Please explain |
|---|---|---|---|---|

| | | | | |
|---|---|---|---|---|
| Fresh surface water, including rainwater, water from wetlands, rivers, and lakes | Not relevant | | | Halkbank uses municipal water in all its branches. It does not draw fresh surface water from any river or basin and does not carry out rainwater harvesting practices. |
| Brackish surface water/Seawater | Not relevant | | | Halkbank uses municipal water in all its branches. It does not purify or use brackish or sea water in any of its facilities. |
| Groundwater – renewable | Not relevant | | | Halkbank uses municipal water in all of its branches. No groundwater is drawn in any of its facilities throughout the country. |
| Groundwater – non-renewable | Not relevant | | | Halkbank uses municipal water in all of its branches. No groundwater is drawn in any of its facilities throughout the country. |
| Produced/Entrained water | Not relevant | | | Halkbank uses municipal mains water in all its branches. There is no water production in any of its branches. |
| Third party sources | Relevant | 213.2 | About the same | Quality and sufficient amount of fresh water are needed for the consumption and hygiene of the employees in all branches. All water withdrawals are from the municipal water mains and drinking water is supplied from local suppliers in the form of 0.5 liter recyclable PET bottles. The total water withdrawal value in 2020 is 213.2 megaliters and this value has not changed in 2021. While the discharge volume increased due to 10 branches opened in 2021, the decrease in water consumption as a result of the IT and call center departments working completely from home created a balance in the total water withdrawal value and no change was observed. With the possible water efficiency projects that Halkbank can implement, this value is expected to decrease slightly. |

# W1.2i

**(W1.2i) Provide total water discharge data by destination.**

| | Relevance | Volume (megaliters/year) | Comparison with previous reporting year | Please explain |
|---|---|---|---|---|
| Fresh surface water | Not relevant | | | Halkbank does not discharge water directly to any fresh surface water. All of Halkbank's wastewater is discharged to the municipal sewer system. |
| Brackish surface water/seawater | Not relevant | | | Halkbank does not directly discharge any brackish water/seawater. All of Halkbank's wastewater is discharged to the municipal sewer system. |
| Groundwater | Not relevant | | | Halkbank does not directly discharge water into any groundwater. All of Halkbank's wastewater is discharged to the municipal sewer system. |
| Third-party destinations | Relevant | 206.2 | About the same | All of the wastewater is discharged into sewer systems managed by municipalities. In the Halkbank, the amount of water discharge is equal to the amount of water drawn from the municipal water network. Since drinking water is considered water consumption, it is not taken into account when calculating the water discharge level. The total water discharge volume, which was 202.3 megaliters in 2020, increased to 206.2 in 2021. Halkbank's return to pre-pandemic conditions with a hybrid system and the opening of 10 new branches resulted in an increase of 1.93% in the total discharge volume. Year-to-year changes in values between 5% and 15% are considered "high" or "low", and changes over 15% are considered "much higher" or "much lower" for bank operations. While accepting this change as almost the same, this value is expected to decrease slightly in the future with water efficiency applications. |

## W1.2j

**(W1.2j) Within your direct operations, indicate the highest level(s) to which you treat your discharge.**

| | Relevance of treatment | Volume (megaliters/year) | Comparison of treated volume | % of your sites/facilities/operations this volume applies to | Please explain |
|---|---|---|---|---|---|

| | level to discharge | | with previous reporting year | | |
|---|---|---|---|---|---|
| Tertiary treatment | Not relevant | | | | Domestic wastewater is not treated in any of the branches across the country. All treatment processes are carried out by wastewater treatment plants operated by the municipal administration. |
| Secondary treatment | Not relevant | | | | Domestic wastewater is not treated in any of the branches across the country. All treatment processes are carried out by wastewater treatment plants operated by the municipal administration. |
| Primary treatment only | Not relevant | | | | Domestic wastewater is not treated in any of the branches across the country. All treatment processes are carried out by wastewater treatment plants operated by the municipal administration. |
| Discharge to the natural environment without treatment | Not relevant | | | | There is no discharge to the natural environment. All treatment processes are carried out by wastewater treatment plants operated by the municipal administration |
| Discharge to a third party without treatment | Relevant | 206.2 | About the same | 100% | In all of Halkbank's operations, wastewater discharges are made to the municipal sewerage system, and wastewater treatment is carried out at the treatment plants operated by the municipalities. Wastewater is treated by the Ministry of Environment and Urbanization in |

| | | | | | |
|---|---|---|---|---|---|
| | | | | | accordance with the Turkish Environmental Law, in accordance with the Urban Wastewater Treatment Regulation. The total water discharge volume, which was 202.3 megaliters in 2020, increased to 206.2 in 2021. Year-to-year changes in values between 5% and 15% are considered 'high' or 'low', and changes over 15% are considered 'much higher' or 'much lower'. Therefore, this change is considered to be approximately the same. It is predicted that the discharge volume will decrease slightly. |
| Other | Not relevant | | | | Domestic wastewater is not treated in any of the branches across the country. All treatment processes are carried out by wastewater treatment plants operated by the municipal administration. |

# W1.3

**(W1.3) Provide a figure for your organization's total water withdrawal efficiency.**

| | Revenue | Total water withdrawal volume (megaliters) | Total water withdrawal efficiency | Anticipated forward trend |
|---|---|---|---|---|
| Row 1 | 86,606,887,000 | 213.2 | 406,223,672.60788 | Halkbank is increasing its branches throughout Turkey with each passing year and implementing water efficiency initiatives. In this context, it is estimated that the efficiency value will slightly decrease since total water withdrawals are expected to decrease and the revenue to increase. |

# W1.4

**(W1.4) Do you engage with your value chain on water-related issues?**

Yes, our suppliers

Yes, our customers or other value chain partners

# W1.4a

**(W1.4a) What proportion of suppliers do you request to report on their water use, risks and/or management information and what proportion of your procurement spend does this represent?**

**Row 1**

**% of suppliers by number**

51-75

**% of total procurement spend**

51-75

**Rationale for this coverage**

i) An explanation of why these suppliers were selected for reporting: A company-wide attention is paid to Halkbank's compliance with ISO 50001, ISO 14001, and ISO 9001 standards. Within the scope of the requirements of these standards, credit and project evaluation reports and water-related data are obtained from the suppliers and these data are collected within the Bank. In the Bank's strategy, all commercial loan requests from SMEs and loan requests over 35 million TL are subject to the credit evaluation report. In this report, the activities of the companies are evaluated in terms of sustainability and environmental criteria.

ii) How suppliers are incentivized to report: Customers requesting credit have to fill out these forms and meet the requirements. Sustainability evaluation was made in 73% of the Firm Evaluation Reports evaluated by the Headquarters in 2021.

**Impact of the engagement and measures of success**

iii) Details of the type of information requested from suppliers: The most important criterion in the international arena for the prevention of water pollution is the decisions of the RAMSAR agreement, which aims to ensure the protection and sustainable use of wetlands. Therefore, this criterion is definitely evaluated in the evaluation reports. If the negative effects of the activities carried out or the planned projects within the company are determined on the wetlands specified in the RAMSAR contract, the projects are not financed even if there is an ISO environmental management standard certificate.

iv) How the information is used within the company: Environmental Impact Assessment, which is a part of credit and project evaluation reports, influences the lending process and decision. In case of any inconsistency between bank policies and customers, improvements and revisions are recommended to customers, the best actions are taken on climate and water issues, and targets are set.

v) Details of how success is measured: The Bank offers trainings to SMEs via the online platform. The demand and participation rate in these trainings successfully proves the applicability of the bank's strategy.

**Comment**

# W1.4b

**(W1.4b) Provide details of any other water-related supplier engagement activity.**

**Type of engagement**

Innovation & collaboration

**Details of engagement**

Educate suppliers about water stewardship and collaboration

Other, please specify

Run an engagement campaign to educate suppliers about climate change

**% of suppliers by number**

51-75

### % of total procurement spend

76-100

### Rationale for the coverage of your engagement

i) An explanation for the engagement coverage: Regular and effective communication with stakeholders is the cornerstone of Halkbank's Sustainability Approach. The Bank selects the suppliers with which it does the most financial work in the trainings it conducts suppliers on water issues related to climate change. Therefore, the coverage of supplier involvement corresponds to 55% of all suppliers. In addition, the trained suppliers correspond to 80% of the entire supply. The main purpose of these trainings is to provide resources to suppliers about the environmental, social, and economic aspects of the concept of sustainability and to guide them in this area.

### Impact of the engagement and measures of success

ii) Details of the beneficial water-related outcomes of the engagement activity: The results obtained through the realization of this engagement help Halkbank in two ways; the first is to help create better-managed sustainability for humanity on climate change and water issues, and the second is to indirectly reduce Halkbank's environmental impacts on water problems related to climate change, such as water scarcity. The opinions and actions of its suppliers on the water have changed over the years, thanks to Halkbank's engagement efforts. The Bank has been organizing these trainings and meetings with its suppliers since 2016. There is a noticeable increase in the number of suppliers that perform better and take action on climate change and water problems in their businesses.

### Comment

## W1.4c

### (W1.4c) What is your organization’s rationale and strategy for prioritizing engagements with customers or other partners in its value chain?

i) Engaged partners within the value chain and a rationale for the engagement: As within the scope of its sustainability and environmental policy, which it has established in line with the Sustainable Development Goals, Halkbank aims and encourages to increase the awareness of all its internal and external stakeholders on climate change, to reduce direct water use, and to find remedial practices in the financing of its customers, especially water-intensive projects.

ii) The method of engagement with the value chain partners: The biggest water-related risk for the banking sector is the risk arising from the loan portfolio. For example, non-repayment of loans extended to customers operating in water-intensive sectors due to the decrease in their income due to drought, flood and other water-related problems is one of the important water-related risks. For this reason, Halkbank tries to manage water-related risks with a detailed Environmental and Social Impact Assessment in its credit evaluation modules. In addition, since Halkbank's primary mission is to support SMEs, online training programs are offered to customers through the www.halkbankkobigelisim.com.tr website. Halkbank also works to reduce the bank's general water withdrawal and raise awareness, and in this context, it provides training to its personnel on climate change and water-related issues. Thanks to these practices, the water withdrawal figures in the branches have decreased noticeably since 2018.

iii) How engagement success is measured:  The demand of SMEs for the trainings offered by Halkbank is one of the success criteria. In addition, thanks to practices such as personnel awareness trainings in direct operations, the water withdrawal figures in branches have decreased noticeably since 2018.

# W2. Business impacts

## W2.1

**(W2.1) Has your organization experienced any detrimental water-related impacts?**

Yes

## W2.1a

**(W2.1a) Describe the water-related detrimental impacts experienced by your organization, your response, and the total financial impact.**

**Country/Area & River basin**

Turkey

Other, please specify

Gediz

### Type of impact driver & Primary impact driver

Acute physical

Drought

### Primary impact

Impact on company assets

### Description of impact

A branch of Halkbank in Izmir was damaged in a flood in 2021. The biggest damage caused by this raid was the damage to the power line and this event caused a financial loss for the Bank. However, the impact of this loss was not considered significant as it constituted 0.000011% of revenue.

### Primary response

Improve maintenance of infrastructure

### Total financial impact

10,000

### Description of response

In response to the damage, approximately 10.000 TL was spent on the water discharge service, submersible pump purchase, and electricity line renewal. However, the impact of this loss was not considered significant as it constituted 0.000011% of revenue.

## W2.2

**(W2.2) In the reporting year, was your organization subject to any fines, enforcement orders, and/or other penalties for water-related regulatory violations?**

No

# W3. Procedures

## W3.3

**(W3.3) Does your organization undertake a water-related risk assessment?**

Yes, water-related risks are assessed

## W3.3a

**(W3.3a) Select the options that best describe your procedures for identifying and assessing water-related risks.**

**Value chain stage**

Direct operations
Supply chain
Other stages of the value chain

**Coverage**

Full

**Risk assessment procedure**

Water risks are assessed as part of other company-wide risk assessment system

**Frequency of assessment**

Annually

**How far into the future are risks considered?**

3 to 6 years

**Type of tools and methods used**

Tools on the market
Databases
Other

### Tools and methods used

WRI Aqueduct
Internal company methods
External consultants
Nation specific databases, tools, or standards

### Contextual issues considered

Water availability at a basin/catchment level
Water quality at a basin/catchment level
Stakeholder conflicts concerning water resources at a basin/catchment level
Water regulatory frameworks
Status of ecosystems and habitats
Access to fully-functioning, safely managed WASH services for all employees

### Stakeholders considered

Customers
Employees
Investors
Local communities
NGOs
Regulators
Suppliers
Water utilities at a local level

### Comment

N/A

# W3.3b

**(W3.3b) Describe your organization’s process for identifying, assessing, and responding to water-related risks within your direct operations and other stages of your value chain.**

**1. The application of the tools:**

Halkbank's operational risks include loss of income as a result of flooding that may cause property and asset damage, not being able to get clean water and the spread of infection are possible water-related risks. Therefore, as part of the risk assessment process, the Bank evaluates the quantitative analysis such as water stress risk and qualitative analysis such as water quality parameters of the regions where its operational activities are carried out with the WRI Aqueduct Tool and the government's annual reports and databases are used as a tool and resource in determining risks and internal methods. After identifying these risks, the Bank integrates the outputs into the Environmental and Social Impact Assessment as an internal method created within the company and evaluates its customers.

**2. Management of outputs of the risk assessment:**

Experienced or potential harmful water-related effects are always considered as part of the risk assessment process. As a result of the evaluation, possible material damage, loss of income, and inability to operate are taken into consideration, and customers are questioned in this context during the environmental and social impact assessment process. Risks are evaluated from a global perspective at least four times a year at Sustainability Committee meetings, once a month at Sustainability Coordination group meetings, and once a year in management reviews of the Board of Directors. By sharing the experiences of different business units, emerging issues are brought to the agenda, possible solutions are discussed and optimal solutions are decided. Budget adjustments are made for necessary measures. For example, regarding the supply chain, since the Bank's main water suppliers are municipalities, their inability to supply water may increase the Bank's operational costs such as water transportation and storage. In the event of such risks, there are communication protocols for local branches and these are responded to immediately by the head office support units.

**3. Reason for contextual issues considered:**

Halkbank uses water as a part of WASH in its direct operations. In addition, the water use of the customers, especially for agriculture and hydroelectric power plant projects, is quite high. Therefore, the water availability and quality at a basin level is very important for the Bank in both direct and indirect use and is considered part of the risk assessment process.

Failure to comply with water regulations and having a negative impact on the ecosystem or habitat status poses both regulatory and reputational risks for the bank. Therefore, during the environmental and social impact assessment process, environmental legislation/legislation changes are followed, revisions are made in the domestic legislation and necessary steps are taken.

The Bank is committed to protecting employees' right to access clean water and providing a healthy working environment. Failure to do so carries operational and reputational risks for the bank. For this reason, access to fully functional, securely managed WASH services for all employees is addressed in the risk assessment.

**4. Reason for stakeholder considered:**
Water-related risks may affect the repayment ability of customers, especially those in the agricultural sector, which creates credit risk for the bank.

The Bank includes its employees in the evaluation with the principle of clean water and sanitation within the scope of SDG 6 as it carries operational and reputational risks for its direct and indirect operations.

Relationships between the bank and investors are important in terms of access to foreign funds. Many international funds require individuals to have standard practices in their activities and to consider environmental issues in loan allocation.

Conflicts that may arise with the views of local people and NGOs in projects to be financed carry a reputational risk for the bank, therefore local people and NGOs are included in the process. For example, a Sustainability Priority Questionnaire is sent to NGOs, and expectations and current situation analyses from Halkbank are compiled in these surveys.

Non-compliance with regulations carries reputational and regulatory risks for Halkbank. Therefore, changes in environmental legislation created by regulators are monitored by the Bank's legal department and sustainability expert, revisions are made in domestic legislation and necessary steps are taken. In addition, the legislations are followed and necessary arrangements are made to ensure compliance.

Supplier-based risks carry operational risks for the bank. In addition, the bank provides drinking water from the municipality. It is accepted that the water levels in the basins used by the municipalities as a resource have decreased. Since this situation will also create stress on the communities that use municipal water, local water services are also taken into account in the relevant risk assessments.

# W4. Risks and opportunities

## W4.1

**(W4.1) Have you identified any inherent water-related risks with the potential to have a substantive financial or strategic impact on your business?**

Yes, both in direct operations and the rest of our value chain

## W4.1a

**(W4.1a) How does your organization define substantive financial or strategic impact on your business?**

Water-related risks are primarily relevant to the extent that they pose a threat to Halkbank's business, which could potentially affect its customers' creditworthiness and ability to repay loans. While achieving the targets and strategies of the Bank collectively and for each type of risk, there is a limit of risk we want to carry. The threshold level is determined to ensure that the Bank remains within the limits of its risk capacity. The trigger level refers to the level of early warning of the risk level. The purpose of the risk level framework is not to prevent taking risks, but to ensure that bank strategies and plans are applied in a consistent manner with the risk level determined by the Board of Directors and that the Bank has an appropriate risk profile. Risk and performance indicators are created by taking into account the scope of the risk in order to provide an analysis of risk factors that are considered to have an impact. While creating these indicators, it should be taken into consideration that operational losses/errors may affect risks. Therefore, the same metrics can be taken into account both in determining operational risk and in assessing reputation risks. Apart from this, metrics that do not indicate operational risk but point to reputation risk can be created. The numerical quantities in the indicators and the changes these sizes show over time are used in the process of determining and evaluating the risks. For example, reconciliation errors, staff turnover rate, number of system outages, transaction volumes and error numbers, audit scores, number/rate of non-audit activity areas. Risk indicators (for example, the number of system outages in a given period) are used to monitor possible factors related to key risks. Performance indicators (for example, customer satisfaction index, indicators such as a high degree of change in stock prices compared to banks of similar scale) provide meaningful information about the current state of business processes with operational weaknesses, errors and losses. Both risk and performance indicators act as a trigger mechanism at trigger levels where risk levels approach or exceed threshold/limits and require immediate risk reduction.

**Definition and quantifiable indicators of substantive financial impact:** Arising from water issues related to climate change, under the operational risk category, operational risk limits can be taken as a basis in CDP reporting. An operational risk event arising from climate change exceeding TL 55,000,000 to be experienced on an annual basis or in a single event can be considered to have a significant financial impact for Halkbank.

In addition, Halkbank evaluates the significant risks related to water in the following context:
(a) The presence of water-related risks in the projects financed by the Bank has a negative impact on both financial and non-financial performance, such as the default risk of loans, and reputational loss from bad loans.
(b) Lending Projects that are sensitive to water-related risks, such as agricultural industries and investments, carry a risk of repayment.
(c) Service interruption caused by natural disasters such as floods may have a temporary negative impact on income, even if there is no substantial change in the broad grid business.
(d) Companies that have been exposed to the media for activities that cause water pollution may pose a risk to the Bank's reputation. Newspapers and news are followed regularly by the Bank's relevant units, and such news is detected and necessary actions are taken.

# W4.1b

**(W4.1b) What is the total number of facilities exposed to water risks with the potential to have a substantive financial or strategic impact on your business, and what proportion of your company-wide facilities does this represent?**

| | Total number of facilities exposed to water risk | % company-wide facilities this represents | Comment |
|---|---|---|---|
| Row 1 | 113 | 1-25 | Due to the products it serves, the banking sector generally faces risks related to water originating from the producers it finances. The risk that can have a strategic impact on the bank's direct operations is acute physical risks such as flooding. Considering both income and water stress risk, it was determined that 113 facilities out of a total of 1056 branches of the bank could be damaged by a strategic effect in a possible flood. |

# W4.1c

**(W4.1c) By river basin, what is the number and proportion of facilities exposed to water risks that could have a substantive financial or strategic impact on your business, and what is the potential business impact associated with those facilities?**

**Country/Area & River basin**

Turkey

Other, please specify

Sea of Marmara Coast

**Number of facilities exposed to water risk**

2

**% company-wide facilities this represents**

Less than 1%

**% company's total global revenue that could be affected**

Less than 1%

**Comment**

**Country/Area & River basin**

Turkey

Tigris & Euphrates

**Number of facilities exposed to water risk**

111

**% company-wide facilities this represents**

1-25

**% company's total global revenue that could be affected**

1-10

**Comment**

## W4.2

**(W4.2) Provide details of identified risks in your direct operations with the potential to have a substantive financial or strategic impact on your business, and your response to those risks.**

**Country/Area & River basin**

Turkey

Other, please specify

Sea of Marmara Coast

**Type of risk & Primary risk driver**

Acute physical

Flood (coastal, fluvial, pluvial, groundwater)

**Primary potential impact**

Impact on company assets

**Company-specific description**

Extreme weather events are increasing every year with climate change. According to the Turkey Climate Evaluation Report prepared by the General Directorate of Meteorology, 2021 was recorded as the year in which the most extraordinary weather events took place, with 1024 extraordinary weather events. 89% of these weather events are floods. The loss caused by these events is important for Halkbank's operational

and liquidity risk assessments. In big cities such as Ankara and Istanbul, where the Bank has many operational buildings and vehicles, natural events such as floods and hail caused by extreme weather conditions may cause physical damage to property due to these natural events. One of the units that will have a strategic impact on the bank in a possible flood disaster is the IT building. The Bank has taken insurance measures in case of possible damage to the electric lines and equipment.

**Timeframe**

4-6 years

**Magnitude of potential impact**

Medium

**Likelihood**

Likely

**Are you able to provide a potential financial impact figure?**

Yes, a single figure estimate

**Potential financial impact figure (currency)**

500,000

**Potential financial impact figure - minimum (currency)**

**Potential financial impact figure - maximum (currency)**

**Explanation of financial impact**

The damage to the power line of the bank's data processing building, the computers, and other equipment inside the building was calculated as approximately 500,000 TL in a possible flood.

**Primary response to risk**

Increase insurance coverage

### Description of response

Extreme weather events such as floods are increasing every year because of climate change. As a result of the Bank's risk assessments related to water, the bank expanded its insurance coverage in case of damage to its strategic buildings, especially the IT building.

### Cost of response

150,000

### Explanation of cost of response

In response to the related risk, approximately 150000 TRY is estimated for expanding the coverage of insurance companies. Exact values cannot be disclosed due to confidential data.

## W4.2a

**(W4.2a) Provide details of risks identified within your value chain (beyond direct operations) with the potential to have a substantive financial or strategic impact on your business, and your response to those risks.**

### Country/Area & River basin

Turkey

Tigris & Euphrates

### Stage of value chain

Other, please specify

Portfolio

### Type of risk & Primary risk driver

Acute physical

Drought

### Primary potential impact

Changing revenue mix and sources

### Company-specific description

As part of its sustainable financing efforts, Halkbank contributes to facilitating Turkey's transition to a low-carbon economy by reducing foreign dependency on energy. In this direction, the share of HPP, WPP, BPP, and SPP renewable energy and energy-saving projects in the energy investments portfolio it supports is constantly increasing. In 2021, 654 million TL was provided for 25 renewable power plant projects with a total installed capacity of 301.49 MW. Thanks to these power plants, which were evaluated by Halkbank, approximately 295,754 tons of CO2e emissions were reduced. The Bank provided the most financing to HPP facilities in renewable energy projects until 2021. However, the fact that Turkey is a region with high water stress and the fact that these power plants are located in regions with high water stress risk is considered a water-based credit risk. Three of these HEPP facilities are located in the Tigris-Euphrates basin, which was found to be at high water stress risk using the WRI Aqueduct Tool. Therefore, taking this risk assessment into account, the renewable energy loan distribution in 2021 has been balanced within the portfolio as WPP, SPP, BPP, and HPP, respectively.

### Timeframe

4-6 years

### Magnitude of potential impact

Medium-high

### Likelihood

Very likely

### Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

### Potential financial impact figure (currency)

1,000,000,000

### Potential financial impact figure - minimum (currency)

### Potential financial impact figure - maximum (currency)

### Explanation of financial impact

Halkbank evaluated that the 3 power plants located in the Euphrates-Tigris basin, which has a higher risk of water stress compared to other HEPP projects it finances, have a strategic impact on revenue. In the event of a possible drought, the maximum cost of repayment and credit risk was calculated based on the scenario that these facilities would not be able to produce any energy. Consideringly, this cost is calculated by the sum of the income obtained from the difference between the interest applied to the loan given and funds transfer pricing, and it has been observed that the risk cost of the loans given is approximately 1,000,000,000 TL.

### Primary response to risk

Direct operations

Develop new products and/or markets

### Description of response

Turkey, which has a wide range of renewable energy resources, is among the countries that are suitable for the use of wind energy in the world. Wind and solar energy are among the renewable energy sources. By the end of 2021, Turkey's total installed wind power has reached 10,750 megawatts. In addition, in 2021, 9.4% of Turkey's electricity production was obtained from wind and 4% from solar. In response to the potential drought-related risks by hydroelectric power plants in the future, Halkbank balanced its renewable energy loan distribution in the portfolio as WPP, SPP, BPP, and HEPP, respectively, in 2021.

### Cost of response

512,334,200

### Explanation of cost of response

Halkbank provided 257.120.00 TL for WPP projects and 188.388,000 TL for SPP projects in 2021. Halkbank, which provides the portfolio distribution at this rate against the risks of HEPP projects, provided a total of 445,508,000 TL in financing. The portfolio risk in HEPP has decreased to %15 from %45 in 2021. In contrast to that, the ratio of WPP financings in total renewable project portfolio has increased to 39%; and SPP has increased to 29% from 21% in 2021. The interest income of these loans is estimated as 15% of the amounts given, corresponding to approximately 66,8 M TRY. The cost of response has been calculated as 512,334,200TL with the sum of these two values.

# W4.3

**(W4.3) Have you identified any water-related opportunities with the potential to have a substantive financial or strategic impact on your business?**

Yes, we have identified opportunities, and some/all are being realized

# W4.3a

**(W4.3a) Provide details of opportunities currently being realized that could have a substantive financial or strategic impact on your business.**

**Type of opportunity**

Products and services

**Primary water-related opportunity**

Increased sales of existing products/services

**Company-specific description & strategy to realize opportunity**

i) An explanation of why this opportunity is considered strategic for the company: As part of its sustainable financing efforts, Halkbank contributes to facilitating Turkey's transition to a low-carbon economy by reducing foreign dependency on energy. In this direction, the share of HPP, WPP, BPP, and SPP renewable energy and energy-saving projects in the energy investments portfolio it supports is constantly increasing. The increased risk of water stress with the climate crisis reduces the demand for HPP. In addition, Turkey's electricity production was 9.4% from wind and 4% from solar in 2021. Since solar energy is expected to be the trend energy in the world in 2022, Halkbank evaluated the financing distribution of its 2021 portfolio according to this opportunity.

ii) An explanation of the action being taken to realize the opportunity: Halkbank annually evaluates the water stress risk of both the regions where it directly operates and the regions it finances with the WRI Aqueduct Tool and determines its strategy accordingly. Having provided the highest share in renewable energy financing to HPPs until 2021, the Bank re-established the balance in its portfolio in 2021, considering that these power plants are located in regions with high water stress risk and carry a repayment risk.

iii) An example of the action taken to realize the opportunity, with reference to their outcome and timescale of implementation: The renewable energy loan distribution in 2021 has been balanced within the portfolio as WPP, SPP, BPP, and HPP, respectively.

**Estimated timeframe for realization**

Current - up to 1 year

**Magnitude of potential financial impact**

Medium-high

**Are you able to provide a potential financial impact figure?**

Yes, a single figure estimate

**Potential financial impact figure (currency)**

66,800,000

**Potential financial impact figure – minimum (currency)**

**Potential financial impact figure – maximum (currency)**

**Explanation of financial impact**

Turkey, which has a wide range of renewable energy resources, is among the countries that are suitable for the use of wind energy in the world. Wind and solar energy are among the renewable energy sources. By the end of 2021, Turkey's total installed wind power has reached 10,750 megawatts. In addition, in 2021, 9.4% of Turkey's electricity production was obtained from wind and 4% from solar. In response to the potential drought-related risks by hydroelectric power plants in the future, Halkbank balanced its renewable energy loan distribution in the portfolio as WPP, SPP, BPP, and HEPP, respectively, in 2021. Halkbank provided 257.120.00 TL for WPP projects and 188.388,000 TL for SPP projects in 2021. Halkbank, which provides the portfolio distribution at this rate against the risks of HEPP projects, provided a total of 445,508,000 TL in financing. The portfolio risk in HEPP has decreased to %15 from %45 in 2021. In contrast to that, the ratio of WPP financings in total renewable project portfolio has increased to 39%; and SPP has increased to 29% from 21% in 2021. The interest income of these loans is estimated as 15% of the amounts given, corresponding to approximately 66,8 M TRY.

# W5. Facility-level water accounting

## W5.1

**(W5.1) For each facility referenced in W4.1c, provide coordinates, water accounting data, and a comparison with the previous reporting year.**

**Facility reference number**

Facility 1

**Facility name (optional)**

Headquarters

**Country/Area & River basin**

Turkey

Other, please specify

Sea of Marmara Coast

**Latitude**

41.008237

**Longitude**

28.978358

**Located in area with water stress**

Yes

**Total water withdrawals at this facility (megaliters/year)**

18

**Comparison of total withdrawals with previous reporting year**

Higher

**Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes**

0

**Withdrawals from brackish surface water/seawater**

0

**Withdrawals from groundwater - renewable**

0

**Withdrawals from groundwater - non-renewable**

0

**Withdrawals from produced/entrained water**

0

**Withdrawals from third party sources**

18

**Total water discharges at this facility (megaliters/year)**

17.5

**Comparison of total discharges with previous reporting year**

Higher

**Discharges to fresh surface water**

0

**Discharges to brackish surface water/seawater**

0

### Discharges to groundwater

0

### Discharges to third party destinations

17.5

### Total water consumption at this facility (megaliters/year)

0.5

### Comparison of total consumption with previous reporting year

Much lower

### Please explain

The water accounting data of the Headquarters, which is located in the Sea of Marmara coast and has a strategic effect, specified in the 1st line of question W4.1c , is given in this line. Halkbank monitors the water stress risk of all branches with the WRI Aqueduct Tool. Halkbank monitors the water stress risk of all branches with the WRI Aqueduct Tool. Water consumption value is the volume of water purchased for employees to drink. The water discharge volume is the water volume supplied from the municipal water source. The total withdrawal volume is calculated by the sum of these two uses. Halkbank defines the change between 5% and 15% as high or low in its operations. If the comparison result is less than 5%, it is considered about the same, if it is higher than 15%, it is considered very high or very low. Since the water used in all business units is supplied only from municipalities and clean water purchasing services, the withdrawal and discharge sources other than third party is calculated as 0.

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### Facility reference number

Facility 2

### Facility name (optional)

Information Technology Center

### Country/Area & River basin

Turkey

Other, please specify

Sea of Marmara Coast

**Latitude**

41.008237

**Longitude**

28.978358

**Located in area with water stress**

Yes

**Total water withdrawals at this facility (megaliters/year)**

1.92

**Comparison of total withdrawals with previous reporting year**

Much higher

**Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes**

0

**Withdrawals from brackish surface water/seawater**

0

**Withdrawals from groundwater - renewable**

0

**Withdrawals from groundwater - non-renewable**

0

**Withdrawals from produced/entrained water**

0

**Withdrawals from third party sources**

1.92

**Total water discharges at this facility (megaliters/year)**

1.9

**Comparison of total discharges with previous reporting year**

Much higher

**Discharges to fresh surface water**

0

**Discharges to brackish surface water/seawater**

0

**Discharges to groundwater**

0

**Discharges to third party destinations**

1.9

**Total water consumption at this facility (megaliters/year)**

0.02

**Comparison of total consumption with previous reporting year**

Much lower

**Please explain**

The water accounting data of the IT, which is located in the Sea of Marmara Coast and has a strategic effect, specified in the 1st line of question W4.1c, is given in this line. Halkbank monitors the water stress risk of all branches with the WRI Aqueduct Tool. Water consumption value is the volume of water purchased for employees to drink. The water discharge volume is the water volume supplied from the municipal water source. The total withdrawal volume is calculated by the sum of these two uses. Halkbank defines the change between 5% and 15% as high or low in its operations. If the comparison result is less than 5%, it is considered about the same, if it is higher than 15%, it is considered very high or very

low. Since the water used in all business units is supplied only from municipalities and clean water purchasing services, the withdrawal and discharge sources other than third party is calculated as 0.

**Facility reference number**

Facility 3

**Facility name (optional)**

111 Branches located in the Euphrates-Tigris basin

**Country/Area & River basin**

Turkey

Tigris & Euphrates

**Latitude**

37.167403

**Longitude**

38.795514

**Located in area with water stress**

Yes

**Total water withdrawals at this facility (megaliters/year)**

22.42

**Comparison of total withdrawals with previous reporting year**

About the same

**Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes**

0

**Withdrawals from brackish surface water/seawater**

0

**Withdrawals from groundwater - renewable**

0

**Withdrawals from groundwater - non-renewable**

0

**Withdrawals from produced/entrained water**

0

**Withdrawals from third party sources**

22.42

**Total water discharges at this facility (megaliters/year)**

21.68

**Comparison of total discharges with previous reporting year**

Higher

**Discharges to fresh surface water**

0

**Discharges to brackish surface water/seawater**

0

**Discharges to groundwater**

0

**Discharges to third party destinations**

21.68

### Total water consumption at this facility (megaliters/year)

0.74

### Comparison of total consumption with previous reporting year

Much lower

### Please explain

The data of the 111 branches, which are located in the Euphrates Tigris river and have a strategic effect, specified in the 2nd line of the W4.1c question, are grouped by the river basin and their water accounting data is given in this row. Halkbank monitors the water stress risk of all branches with the WRI Aqueduct Tool. Water consumption value is the volume of water purchased for employees to drink. The water discharge volume is the water volume supplied from the municipal water source. The total withdrawal volume is calculated by the sum of these two uses. Halkbank defines the change between 5% and 15% as high or low in its operations. If the comparison result is less than 5%, it is considered about the same, if it is higher than 15%, it is considered very high or very low. Since the water used in all business units is supplied only from municipalities and clean water purchasing services,  the withdrawal and discharge sources other than third party is calculated as 0.

## W5.1a

### (W5.1a) For the facilities referenced in W5.1, what proportion of water accounting data has been third party verified?

### Water withdrawals – total volumes

### % verified

76-100

### Verification standard used

ISAE3000 (Revised)

### Water withdrawals – volume by source

### % verified

76-100

### Verification standard used

ISAE3000 (Revised)

## Water withdrawals – quality by standard water quality parameters

### % verified

76-100

### Verification standard used

The total water withdrawal volume of Halkbank includes the drinking water purchased for its employees and the water discharged. Municipalities take samples and verify the water quality parameters, which are accredited 17025 in their own laboratory.

## Water discharges – total volumes

### % verified

76-100

### Verification standard used

ISAE3000 (Revised)

## Water discharges – volume by destination

### % verified

76-100

### Verification standard used

ISAE3000 (Revised)

## Water discharges – volume by final treatment level

### % verified

76-100

### Verification standard used

In all of Halkbank's operations, wastewater discharges are made to the municipal sewerage system, and wastewater treatment is carried out at the treatment plants operated by the municipalities. The water discharge volume by final treatment level is verified according to ISAE 3000 (Revised).

## Water discharges – quality by standard water quality parameters

### % verified

76-100

### Verification standard used

In all of Halkbank's operations, wastewater discharges are made to the municipal sewerage system, and wastewater treatment is carried out at the treatment plants operated by the municipalities. Municipalities take samples and verify the water quality parameters, which are accredited 17025 in their own laboratory.

## Water consumption – total volume

### % verified

76-100

### Verification standard used

ISAE3000 (Revised)

# W6. Governance

## W6.1

### (W6.1) Does your organization have a water policy?

Yes, we have a documented water policy that is publicly available

## W6.1a

### (W6.1a) Select the options that best describe the scope and content of your water policy.

| | Scope | Content | Please explain |
|---|---|---|---|
| Row 1 | Company-wide | Description of business dependency on water<br>Description of business impact on water<br>Company water targets and goals<br>Commitments beyond regulatory compliance<br>Commitment to stakeholder awareness and education<br>Commitment to safely managed Water, Sanitation and Hygiene (WASH) in the workplace<br>Acknowledgement of the human right to water and sanitation | Halkbank is aware of how climate change can affect water problems. It has sustainability and environmental policies consisting of the approaches and actions to be taken in order to protect the environment and minimize the negative effects of its functions. In line with these policies, the WRI Aqueduct Tool and the Ministry of Agriculture and Forestry monitor the water stress and amount of water in the basins. Thus, the Bank's water-related strategies can be determined through qualitative and quantitative analysis.<br>As Halkbank, we are aware of the importance of water in human life. In this framework, the Bank constantly reviews and improves its policies, environmental, energy, and water management systems in all its branches and regions; aims and undertakes to reduce the consumption of resources such as energy and water by controlling it and reducing the negative effects that may arise from its activities.<br>In addition, the Bank, which advocates that water is a natural human right and that everyone should have access to clean water for consumption and hygiene, prefers to cooperate with suppliers who are aware of the importance of water in its business relations with the value chain. In this context, it takes initiatives to raise awareness by organizing trainings on water and climate issues as much as possible in the value chain. In addition, the Bank offers trainings and resources on water and climate change to SME customers via the online platform. |

| | | | |
|---|---|---|---|
| | | Recognition of environmental linkages, for example, due to climate change | |

## W6.2

**(W6.2) Is there board level oversight of water-related issues within your organization?**

Yes

## W6.2a

**(W6.2a) Identify the position(s) (do not include any names) of the individual(s) on the board with responsibility for water-related issues.**

| Position of individual | Please explain |
|---|---|
| Board-level committee | i) Responsibilities of the committee: The Sustainability Committee consists of 20 members at the level of two Board Members, four Deputy General Managers, two Group Presidents, and twelve Department Heads. The chairman of the committee serves as the independent board member of the Bank, and the vice-chairman of the committee serves as a member of the bank's board of directors. The Sustainability Committee is responsible for coordinating the Bank's sustainability efforts, assessing the economic, environmental, and social impacts of its activities, assessing and managing risks related to climate, water, and sustainability, taking decisions to take necessary actions, and overseeing the risks related to climate and water that the bank will face. The Committee reports to the Bank's Board of Directors to coordinate the Bank's sustainability activities. It also conveys risks and other issues subject to the board's authorization level to the board of directors.<br><br>ii) Example of a water-related decision: The energy, environment, and water management performance of the branches is monitored with the software called İKLİM, which means the climate, created with the bank's own resources. In 2020, the Board Level Sustainability Committee decided to include the results of this software in branch performance evaluations and to implement incentive mechanisms according to the performance of branches in line with reduction targets in water and other environmental issues. In 2021, the Committee decided to improve business processes in order to adapt to national and international developments within the scope of combating the |

| | |
|---|---|
| | climate crisis. In this direction, the Committee has decided to establish a Climate Action Plan and also has joined the Net-Zero Banking Alliance, and committed to setting GHG emission reduction targets across its operations and its portfolio in line with SBTI criteria in 2022. |

# W6.2b

**(W6.2b) Provide further details on the board's oversight of water-related issues.**

| | Frequency that water-related issues are a scheduled agenda item | Governance mechanisms into which water-related issues are integrated | Please explain |
|---|---|---|---|
| Row 1 | Scheduled - all meetings | Monitoring implementation and performance<br>Overseeing major capital expenditures<br>Providing employee incentives<br>Reviewing and guiding annual budgets<br>Reviewing and guiding business plans<br>Reviewing and guiding major plans of action<br>Reviewing and guiding risk management policies<br>Reviewing and guiding strategy<br>Reviewing and guiding corporate responsibility strategy | The Board of Directors carries out the Sustainability Management by joining the Sustainability Committee with two members (at the level of President and Vice President). The sustainability committee meets at least 4 times a year for its regular scheduled meetings. At these regular meetings, risks and opportunities for sustainability issues, including water issues, are evaluated and targets are set. Budget adjustments and performance targets are discussed and decided by a majority vote in order to achieve the targets. In addition, the periodic performance of the targets is compared with the results of the determined period and necessary revisions are decided. Decisions on rewarding performance on sustainability issues are also taken at regular meetings of the Sustainability Committees. The sustainability committee may meet urgently and from time to time to discuss and take decisions on urgent and important issues that arise outside of the regular meeting periods. The Sustainability Practices, Environment, and Energy Management Department Manager is authorized to call irregular sustainability committee meetings. Decisions taken by the committee that may have important results are reported to the board of directors. In addition, a Management review meeting is held at least once a year to ensure the adequacy and effectiveness of the Bank's sustainability practices. Thus, actions can be taken for measures and opportunities for possible water-related risks. |

| | | | |
|---|---|---|---|
| | | Reviewing innovation/R&D priorities | |

## W6.2d

**(W6.2d) Does your organization have at least one board member with competence on water-related issues?**

| | Board member(s) have competence on water-related issues | Criteria used to assess competence of board member(s) on water-related issues |
|---|---|---|
| Row 1 | Yes | As Halkbank, we are subject to Turkish Banking Law and Capital Markets Board (CMB) regulations in the elections of the Board of Directors. The education level of the board about sustainability is important as a climate change competency. The chairman of the Sustainability Committee, who is also a member of BoD, is competent in sustainable development and economics due to their training and expertise. These criteria meet the board members' competence on climate-related issues.<br><br>In addition, all Sustainability Committee members have KPIs on environmental and sustainability issues. In order to evaluate their competence in climate and water-related issues, the fact that they have achieved these targets in the past is used as a criterion and proves their competence. |

## W6.3

**(W6.3) Provide the highest management-level position(s) or committee(s) with responsibility for water-related issues (do not include the names of individuals).**

**Name of the position(s) and/or committee(s)**

Other C-Suite Officer, please specify

Chairman of Sustainability Committee

### Responsibility

Assessing water-related risks and opportunities
Managing water-related risks and opportunities

### Frequency of reporting to the board on water-related issues

Quarterly

### Please explain

i) Water-related topics that are reported to the board: As part of sustainable finance, Halkbank commits to the management of water use in the determination of targets and action plans. It evaluates water-related risks since its external stakeholders, especially the sectors it finances, are highly dependent on water, within the scope of operational and credit risks, and sets targets in the regular meetings where the committee meets at least 4 times a year.

ii) Water-related responsibilities of the committee: The chairman of the committee leads the committee in monitoring the committee's duties and authorities and fulfilling the committee's responsibilities. Issues that require further authority from the sustainability committee are forwarded to the board of directors for decision. The sustainability committee may meet urgently and from time to time to discuss and take decisions on important water-related issues that arise outside of the regular meeting periods.

## W6.4

**(W6.4) Do you provide incentives to C-suite employees or board members for the management of water-related issues?**

| | Provide incentives for management of water-related issues | Comment |
|---|---|---|
| Row 1 | Yes | N/A |

## W6.4a

**(W6.4a) What incentives are provided to C-suite employees or board members for the management of water-related issues (do not include the names of individuals)?**

| | Role(s) entitled to incentive | Performance indicator | Please explain |
|---|---|---|---|
| Monetary reward | Other C-suite Officer<br>Chairman of Sustainability Committee | Reduction of water withdrawals<br>Reduction in consumption volumes<br>Improvements in efficiency - direct operations<br>Improvements in efficiency - supply chain<br>Improvements in efficiency - product-use<br>Increased access to workplace WASH<br>Implementation of water-related community project | i) Details on the indicator/s chosen: Halkbank monitors the water withdrawal and consumption values annually with the İKLİM software, which means "the climate", it has developed and reports it mainly with GHG emission calculations.<br><br>ii) The rationale for the chosen indicator/s: In line with the water targets that Halkbank has determined by considering its environmental policy; is committed to reducing and optimizing water consumption and withdrawal in its direct operations and increasing water efficiency both in its direct operations and in its supply chain. In addition, no concessions are made on observing the right of employees to access clean water and provide a healthy working environment. Therefore, the sustainability committee and committee chairperson, who develop projects and realize KPIs within the scope of these principles and objectives, are supported with monetary awards.<br><br>iii) The linkage between the selected performance indicator and type of incentive: In return for a 2% annual reduction in water use in GHG emissions, the Chairman of the Sustainability Committee is given incentive awards such as monetary rewards. |
| Non-monetary reward | Other C-suite Officer<br>Chairman of Sustainability Committee | Reduction of water withdrawals<br>Reduction in consumption volumes<br>Improvements in efficiency - direct operations | i) Details on the indicator/s chosen: Halkbank monitors the water withdrawal and consumption values annually with the İKLİM software, which means "the climate", it has developed and reports it mainly with GHG emission calculations.<br><br>ii) The rationale for the chosen indicator/s: In line with the water targets that Halkbank has determined by considering its environmental policy; is committed to reducing and optimizing water consumption and withdrawal in its direct operations and increasing water efficiency both in its direct operations and in its supply chain. In addition, no concessions are made on observing the right of employees to access clean water and provide a healthy working |

| | | | |
|---|---|---|---|
| | | Improvements in efficiency - supply chain<br>Improvements in efficiency - product-use<br>Increased access to workplace WASH<br>Implementation of water-related community project | environment. Therefore, the sustainability committee and committee chairperson, who develop projects and realize KPIs within the scope of these principles and objectives, are supported with monetary awards.<br><br>iii) The linkage between the selected performance indicator and type of incentive: In return for a 2% annual reduction in water use in GHG emissions, the Chairman of the Sustainability Committee is given incentive awards such as monetary rewards. |

# W6.5

**(W6.5) Do you engage in activities that could either directly or indirectly influence public policy on water through any of the following?**

Yes, direct engagement with policy makers

Yes, trade associations

Yes, other

# W6.5a

**(W6.5a) What processes do you have in place to ensure that all of your direct and indirect activities seeking to influence policy are consistent with your water policy/water commitments?**

i) A description of the process used to ensure consistency: The Bank's water policy and procedures are included in the Bank's environmental policy. Compliance with all activities within this policy is ensured by routine inspection of inspection and internal control units. In addition, the carbon footprint is calculated regularly in order to follow the targets we have determined within the scope of the policy, and the water withdrawal and consumption values are regularly monitored for each branch. In line with the decisions taken at the committee meetings and management reviews, the Bank communicates with the ministry when necessary, exchanges views, and participates in meetings and seminars. Also, opinions are constantly being

exchanged with local municipalities, which are the main water supplier of the bank, by their local offices and central office. In addition, the Bank is a member of the Banks Association of Turkey (TBB) and participates in working groups on the subject.

ii) An explanation of the action taken if the inconsistency is discovered: Nonconformities detected in these audits are reported, and discussed in the committee and the results are shared with the board of directors. Afterward, the relevant departments are informed to take necessary actions. Halkbank negatively evaluates projects in sectors that are accepted and banned in a very high-risk group in the international literature.

## W6.6

**(W6.6) Did your organization include information about its response to water-related risks in its most recent mainstream financial report?**

Yes (you may attach the report - this is optional)

2021-Integrated-Report_Halkbank.pdf

# W7. Business strategy

## W7.1

**(W7.1) Are water-related issues integrated into any aspects of your long-term strategic business plan, and if so how?**

| | Are water-related issues integrated? | Long-term time horizon (years) | Please explain |
|---|---|---|---|
| Long-term business objectives | Yes, water-related issues are integrated | 11-15 | Environmental, social and governance (ESG) criteria are gaining more and more importance in global investment strategies. In its long-term business strategies, Halkbank aims to effectively manage the risks and opportunities it faces in this regard, particularly climate change, and to provide the financing needed for the transition to a low-carbon economy. In this context, it controls the environment and water management in both its direct and indirect activities under the guidance of international standards and regulations. |

| | | | |
|---|---|---|---|
| | | | One of Halkbank's goals regarding direct use of water is to continue to raise awareness in all of its branches and to reduce water withdrawal and water consumption figures annually.<br>Its objectives regarding indirect water use are to monitor the water-related aspects of the projects it provides loans and to actively develop ways to mitigate climate-related impacts, including water problems. These considerations are important given the ever-increasing risks of water scarcity and drought.<br>Moreover, since Halkbank is one of the first signatories of NZBA in mid-2022 and committed to reaching net-zero by 2050, its long-term business strategies are taking action in line with both this decision and the sustainability strategic plan of the Banking Regulation and Supervision Agency (BDDK). |
| Strategy for achieving long-term objectives | Yes, water-related issues are integrated | 11-15 | Halkbank includes environmental and water-related physical and transitional risks in its risk assessment process in line with its long-term strategy. As part of this process, it monitors the direct water usage on a monthly basis with the İKLİM software, which means climate, developed in 2019, monitors the water stress of the regions it operates in annually through the WRI Aqueduct Tool, and provides regular trainings to raise the awareness of its employees.<br>In addition, as a bank that aims to increase the awareness of its internal and external stakeholders on climate change and water management, Halkbank tries to manage its water-related risks with a detailed Environmental and Social Impact Assessment in the credit evaluation modules of the projects it finances. Moreover, since Halkbank's primary mission is to support SMEs, it offers its customers an online training program on the www.halkbankkobigelisim.com.tr website. |
| Financial planning | Yes, water-related issues are integrated | 11-15 | Risks related to water issues are evaluated with the participation of all relevant business units of the bank. Among the members of the Sustainability Group is the Assistant General Manager of the Financial Management and Planning Department. The financial aspects of water and climate issues directly related to operations and the value chain are always considered in long-term business planning.<br>In the quarterly meetings of the committee, budget adjustments and performance targets are discussed and decided by a majority of the votes to reach the targets. The financial aspects and targets of water risks are also decided with the participation of the finance department. |

# W7.2

**(W7.2) What is the trend in your organization's water-related capital expenditure (CAPEX) and operating expenditure (OPEX) for the reporting year, and the anticipated trend for the next reporting year?**

## Row 1

### Water-related CAPEX (+/- % change)

6

### Anticipated forward trend for CAPEX (+/- % change)

5

### Water-related OPEX (+/- % change)

26

### Anticipated forward trend for OPEX (+/- % change)

3

### Please explain

The increase in CAPEX is related to the opening of a total of 10 new branches in 2021. Cost calculation covers the supply of water-related applications such as faucets, water tanks, water pumps, and digital water meter systems when necessary. Since Halkbank is a growth-oriented bank, it expects a 5% increase in CAPEX expenses depending on the number of new branches to be opened next year.

Annual water withdrawal and consumption expenditures are taken into account for operating expenses. The increase in OPEX is related to the replacement of 19-liter water bottles with 0.5-liter personal recyclable PET bottles due to pandemic measures. In addition, regular increases in water prices have a great impact on this increase. Considering the impact of both the increasing prices and the increasing water needs of the employees in the branches, an increase of approximately 3% is expected in the OPEX values next year.

# W7.3

**(W7.3) Does your organization use scenario analysis to inform its business strategy?**

| | Use of scenario analysis | Comment |
|---|---|---|
| Row 1 | Yes | |

# W7.3a

**(W7.3a) Provide details of the scenario analysis, what water-related outcomes were identified, and how they have influenced your organization's business strategy.**

| | Type of scenario analysis used | Parameters, assumptions, analytical choices | Description of possible water-related outcomes | Influence on business strategy |
|---|---|---|---|---|
| Row 1 | Water-related<br>Climate-related | Halkbank uses climate scenarios to predict the possible consequences for its lending activities and its own operations in the future due to climate change. The Network for Greening the Financial System (NGFS) focuses on climate scenarios and determines its strategies by taking into account the future analyses of the WRI Aqueduct Tool.<br>While NGFS offers 6 scenarios, the Bank, which has committed to becoming net-zero until 2050 to the NZBA in mid-2022, considers the Net-Zero 2050 scenario, which is one of the regular scenarios, in its | The annual amount of usable water per capita in Turkey is around 1,350 cubic meters. It is predicted that the amount of water per capita will be around 1,000 cubic meters due to the population reaching 100 million in 2030 and the increase in water pollution and the effects of drought. This situation will make it difficult to meet the water demand, especially in densely populated areas, and may cause new regulations and changes in water distribution and restrictions for sectors with intensive water use in industries. Halkbank foresees such water cuts/restrictions especially in the | A description of the response to the water related outcomes and the anticipated timescale: With the results of the related scenario analysis, Halkbank plans to reduce the water consumption levels arising from its activities, not establish customer relations with companies that may cause water pollution unless the necessary measures determined in the standards are taken, and develop practices that encourage environmentally friendly technologies. In addition, within the scope of the scenario analysis results, it is expected that the hydroelectric and agriculture sector |

| | | | | |
|---|---|---|---|---|
| | | strategies. Net-Zero 2050 assumes that global warming is limited to 1.5°C, strict climate policies are in place, and it is possible to reach net-zero greenhouse gases by 2050. One of the most important topics that this scenario focuses on is resource efficiency, especially for the energy and agriculture sectors. Since Halkbank provides financing to the hydroelectric power plant and agriculture sector, it also takes water into account under this heading and evaluates possible risks for water with future analyzes of the WRI Aqueduct Tool. In this tool, possible changes in Turkey's water stress, seasonal variability, water supply, and water demand between 2030-2040 are followed. | energy and agriculture sectors that it finances and includes it in the risk assessment process as a loan payment risk. | companies will be affected by the decreases in precipitation levels and the effects of droughts. This expectation requires regulation in the credit allocation evaluation methods of banks. Halkbank has integrated the necessary water-related criteria into the environmental and social impact assessment in its credit evaluation modules. In addition, by taking climate change into account in its portfolios, it balances credit distributions against the risks that may be experienced. Moreover, as a precaution, the bank plans to use circular water systems in its branches until 2030. |

# W7.4

## (W7.4) Does your company use an internal price on water?

### Row 1

#### Does your company use an internal price on water?

No, but we are currently exploring water valuation practices

#### Please explain

Halkbank operates in the banking sector and its activities are not considered water-intensive. Despite this, necessary measures are constantly taken to reduce water consumption and water withdrawal levels are monitored for possible optimizations. In this context, the Bank plans to take

steps to increase water efficiency in its operations by being aware of the possible risks related to water in the future. Internal water price could be one of these improvements. Halkbank is currently researching best practices that can be integrated into its operations.

## W7.5

**(W7.5) Do you classify any of your current products and/or services as low water impact?**

| | Products and/or services classified as low water impact | Primary reason for not classifying any of your current products and/or services as low water impact | Please explain |
|---|---|---|---|
| Row 1 | No, but we plan to address this within the next two years | Important but not an immediate business priority | As a company serving in the banking sector, Halkbank does not produce any product, and water use is not intensive. Therefore, there is currently no low water impact product or service. However, the most important product and service it offers is the loans it gives to projects within the scope of sustainable finance. Taking into account the water management of the projects for which environmental and social impact assessment is made, the Bank may update the relevant procedure in the future to prioritize projects with low water impact. The Bank continues its research in this direction. |

# W8. Targets

## W8.1

**(W8.1) Describe your approach to setting and monitoring water-related targets and/or goals.**

| | Levels for targets and/or goals | Monitoring at corporate level | Approach to setting and monitoring targets and/or goals |
|---|---|---|---|

| | | | |
|---|---|---|---|
| Row 1 | Company-wide targets and goals<br>Basin specific targets and/or goals | Targets are monitored at the corporate level<br>Goals are monitored at the corporate level | Halkbank aims to provide clean drinking water to its employees, raise awareness by providing necessary training to its customers, exchange opinions with public authorities on the creation of sustainable water policies and management models, and support initiatives in the sustainability scene. In this context, regarding regulations and within the scope of ISO 14001 Environmental Management System, it regularly monitors its impact on the environment and water in its direct and indirect operations and calculates GHG emissions and total water withdrawals and consumption every year. However, since it operates in a country with high water stress, it evaluates the water stress of both its own activities and the regions of projects it finances with the WRI Aqueduct Tool and works to achieve the goals which are explained in the questions below. Attaching importance to transparency, the Bank publishes its sustainability targets and related accounts for the year, and the projects it finances, in the integrated report it publishes on its website. |

# W8.1a

**(W8.1a) Provide details of your water targets that are monitored at the corporate level, and the progress made.**

**Target reference number**

Target 1

**Category of target**

Water withdrawals

**Level**

Company-wide

**Primary motivation**

Reduced environmental impact

**Description of target**

Halkbank's target is to have absolute water withdrawals from its branches across the country by 2035 compared to 2018. It is to reduce its environmental impact by reducing water withdrawal by 25%. As employees' water consumption and WASH services depend on this, water is an important input for Halkbank's direct use. To achieve this, investments are made in equipment and assets that use water more efficiently in branches. This target will also provide savings in water costs in line with efficiency.

**Quantitative metric**

% reduction of water withdrawals from municipal supply

**Baseline year**

2018

**Start year**

2020

**Target year**

2035

**% of target achieved**

68

**Please explain**

Halkbank has already achieved 68% of this target, thanks to the training provided to its employees and the more efficient infrastructures established. Pandemic measures also affected this figure positively. As long as progress maintains the current pace, it is thought that this target will be reached early.

# W8.1b

**(W8.1b) Provide details of your water goal(s) that are monitored at the corporate level and the progress made.**

**Goal**

Engaging with customers to help them minimize product impacts

**Level**

Company-wide

**Motivation**

Reduced environmental impact

**Description of goal**

i) Why this goal is important to the company: Halkbank aims to increase the awareness of all its internal and external stakeholders about climate change, reduce direct water use, and improve the financing of its customers, especially water-intensive projects, within the scope of its sustainability and environmental policy, which it has established in line with the Sustainable Development Goals. Therefore, Halkbank tries to manage water-related risks with a detailed Environmental and Social Impact Assessment in its credit evaluation modules. In addition, Halkbank's primary mission is to support SMEs.

ii) How the company is implementing the goal across its chosen level: Halkbank achieves its company-wide target of reducing the environmental impact of its customers by offering online training programs on climate and water to its SME customers through the website www.halkbankkobigelisim.com.tr.

**Baseline year**

2016

**Start year**

2017

**End year**

2040

**Progress**

i) Indicator used to assess progress: The development of this application, which Halkbank has offered since 2016, is evaluated by the participation rate.

ii) The threshold of success and how it has progressed against it: The fact that at least 50% of SMEs attend the relevant training shows that this target has successfully progressed. When the customers who have participated in the trainings are evaluated, it is seen that this target has been successfully progressed.

# W9. Verification

## W9.1

**(W9.1) Do you verify any other water information reported in your CDP disclosure (not already covered by W5.1a)?**

Yes

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Halkbank CDP WS Assurance Report_2207.pdf

## W9.1a

**(W9.1a) Which data points within your CDP disclosure have been verified, and which standards were used?**

| Disclosure module | Data verified | Verification standard | Please explain |
|---|---|---|---|
| W1 Current state | Amount of total water withdrawal volume, total water discharge volume and total water consumption volume | ISAE 3000 | All data shared in Current State has been verified by third parties to the ISAE 3000 (Revised) standard. |

# W10. Sign off

## W-FI

**(W-FI) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.**

You may find additional information regarding our sustainability approach on our web site at https://www.halkbank.com.tr/en/investor-relations/corporate-governance/sustainability.html

Attached, there is verification report of water data disclosed in the questionnaire. The water withdrawal amount in the report is the amount that withdrawn from municipalities. When reporting to CDP, the withdrawals are calculated as the sum of municipality withdrawals and PET bottled water consumed.

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Halkbank CDP WS Assurance Report_2207.pdf

## W10.1

**(W10.1) Provide details for the person that has signed off (approved) your CDP water response.**

| | Job title | Corresponding job category |
|---|---|---|
| Row 1 | Chairman of Sustainability Committee (Halkbank Independent Board Member) | Board/Executive board |

## W10.2

**(W10.2) Please indicate whether your organization agrees for CDP to transfer your publicly disclosed data on your impact and risk response strategies to the CEO Water Mandate's Water Action Hub [applies only to W2.1a (response to impacts), W4.2 and W4.2a (response to risks)].**

# Submit your response

**In which language are you submitting your response?**

**Please confirm how your response should be handled by CDP**

| | I understand that my response will be shared with all requesting stakeholders | Response permission |
|---|---|---|
| Please select your submission options | | Public |

**Please confirm below**