

Welcome to your CDP Water Security Questionnaire 2023

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, the Bank continues to serve the real industry with its innovative products and services with a global vision, with 1,032 branches in the country and 6 abroad as of the end of 2022.

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 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 toward 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 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 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, 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 "IKLIM", which it has developed with its internal resources, 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 contributes 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.

W_{0.2}

(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, 2022	December 31, 2022

W_{0.3}

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

Turkey

W_{0.4}

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



TRY

W_{0.5}

(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?

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	Indirect use	Please explain
	importance	importance	
	rating	rating	
	rating	Tuting	



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. ii&iv) The reason for importance rating and future water dependency for indirect use: Water use is quite high in the production operations 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 customers 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 its branches. 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	Frequency of measurement	Method of measurement	Please explain
Water withdrawals – total volumes	100%	Monthly	Halkbank uses only domestic water. Potable water and the mains water used for this purpose are billed by the municipality and local suppliers. Each office records volume and price information on these invoices monthly in the IKLIM software. Each month, the Department of Sustainable Practices, Environment, and Energy Management uses this software to monitor the total amount of water withdrawal.	Halkbank has been calculating its carbon footprint as an integral component of its comprehensive environmental management system. In addition, Halkbank calculated the Water Footprint for 2022 for the first time. To facilitate the monitoring and collection of the necessary data for this assessment, the bank's IT department developed the IKLIM software, which has been in use since 2019. This software enables the precise measurement of water aspects across all facilities, including department heads, headquarters, and branches, aligning with the environmental management system. With the aid of the software, Bank achieves a complete and accurate record of 100% water withdrawal volumes. This monitoring system aligns with Bank's commitment to optimizing water usage, enhancing water efficiency, and



				minimizing its overall environmental impact. Consequently, the water usage parameter is assessed monthly, evaluated by the General Directorate at the end of the year, and verified.
Water withdrawals – volumes by source	100%	Monthly	Halkbank uses only domestic water. Potable water and the mains water used for this purpose are billed monthly by the municipality and local suppliers. In addition to invoices, Halkbank assesses water stress and availability risks for water resources of all regions in which it operates through the WRI Aqueduct Tool.	Turkey has a significant risk of water stress, and 85% of Halkbank's facilities are located in water-stressed areas in 2022. All of Halkbank's facilities which are department heads, headquarters, and branches use the existing municipal resources of the municipalities and local suppliers where they are located. In accordance with its commitments to build an effective and sustainable water management system in the face of water risks and to successfully implement the system, the Bank monitors the volume of water withdrawal based on water resources to assess potential risks and dependencies.
Water withdrawals quality	100%	Monthly	The municipality is responsible for providing mains water that meets specific quality standards for residential purposes. Similarly, Halkbank ensures that the water is sourced from local drinking water suppliers who possess quality standard documents and have demonstrated compliance through	Pollution or health problems arising from water sources can directly impact the operations of the bank and weaken customer and employee confidence. Therefore, Halkbank regularly monitors the quality of water withdrawal. By doing so, any potential risks can be identified early on, allowing necessary precautions to be



			analysis reports. Quality documents and reports are explicitly required in supplier contracts. Moreover, the Bank monthly monitors the analysis reports on the relevant supplier's website.	taken promptly. This proactive approach ensures the well-being of both the bank's operations and the trust placed in it by customers.
Water discharges – total volumes	100%	Monthly	The municipalities report the discharge volumes to the facilities every month via invoices. Each office records volume and price information on these invoices monthly in the IKLIM software. Each month, the Department of Sustainable Practices, Environment, and Energy Management uses this software to monitor the total amount of water discharges	Halkbank accepts that all water drawn from the municipality is discharged. A municipal sewerage system is used for water discharge at all Halkbank facilities which are department heads, headquarters, and branches. 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 discharges – volumes by destination	100%	Monthly	All Halkbank facilities which are department heads, headquarters, and branches use the municipality's sewer system for water discharge, and each of these discharges is monitored separately by the administrative municipalities. The municipalities report the discharge volumes to the facilities every month via invoices In addition, treated wastewater discharged from treatment plants can be monitored through the reports of both the	As part of its sustainability management, the bank is dedicated to optimizing water usage, improving water efficiency, and reducing its environmental impact. In line with this commitment, the bank monitors the discharge volume based on invoices to track water discharge, while also actively monitoring reports provided by municipalities on their websites to ensure compliance with proper treatment methods. By doing so, the bank aims to effectively control and minimize its



			municipality and the Ministry of Agriculture and Forestry.	environmental impact related to water management.
Water discharges – volumes by treatment method	100%	Monthly	Wastewater is treated by the Ministry of Environment, Urbanization and Climate Change in compliance with the Turkish Environmental Law and the Urban Wastewater Treatment Regulation. The treatment methods implemented by wastewater treatment plants nationwide are available online on municipal and government websites and Halkbank follows these methods monthly	Wastewater discharges from all Halkbank facilities which are department heads, headquarters, and branches are domestic and these wastewaters are discharged into sewer systems under the control of local municipalities. Each municipality in Turkey's 81 provinces has its own infrastructure, and the municipalities also control the infrastructure of the cities. Halkbank follows the treatment methods monthly as it is committed to complying with local laws and obligations
Water discharge quality – by standard effluent parameters	100%	Monthly	Halkbank monitors water discharge quality by standard effluent parameters using publicly accessible data from municipalities on a monthly basis. The absence of any fees or penalties demonstrates that the Bank fulfills the regulatory wastewater discharge quality requirements.	Water discharges to environment are of great importance. At Halkbank facilities which are department heads, headquarters, and 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 Turkish Environmental Law and the Urban Wastewater Treatment Regulation. 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 – emissions to water (nitrates, phosphates, pesticides, and/or other priority substances)	Not relevant			Halkbank uses municipal water in all its facilities which are department heads, headquarters, and local and foreign branches. The Bank uses water to carry out operational activities and to meet the clean water and daily needs of employees. Halkbank, as a financial institution, does not have emissions to water such as nitrates, phosphates, etc. in its direct operations. Therefore, this parameter is not relevant for the bank and will not be relevant as long as the bank continues its operations as a financial institution.
Water discharge quality – temperature	100%	Monthly	Halkbank monitors water discharge quality by standard effluent parameters including temperature using publicly accessible data from municipalities monthly. The absence of any fees or penalties demonstrates that the Bank fulfills the regulatory wastewater discharge quality requirements.	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.
Water consumption – total volume	100%	Monthly	Halkbank only uses domestic water. The bank only includes drinking water supplied by third parties in the amount of	Halkbank's water use consists of cleaning, hygiene, and other domestic water needs equivalent to water drawn from the



			water consumed. Drinking water is billed by the local suppliers. Each office records volume and price information on these invoices monthly in the IKLIM software. Each month, the Department of Sustainable Practices, Environment, and Energy Management uses this software to monitor the total amount of water discharges.	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 and evaluated by the General Directorate at the end of the year.
Water recycled/reused	Less than 1%	Monthly	Halkbank systematically tracks water usage within its office premises utilizing a reverse osmosis system, and this monitoring process is conducted via a flow meter every month.	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. Halkbank aims to reduce and optimize water use and increase water efficiency. Therefore, this parameter is monitored monthly and evaluated by the General Directorate at the end of the year.
The provision of fully- functioning, safely	100%	Continuously	The support services department consistently monitors the accessibility of	In accordance with its Human Rights and Sustainability Policy, Halkbank is



managed WASH	Water, Sanitation, and Hygiene (WASH)	dedicated to safeguarding the right of its
services to all workers	by actively seeking employee feedback.	employees to access clean water and
	This proactive approach enables prompt	fostering a healthy work environment.
	measures to be taken in order to ensure	Consequently, the bank diligently monitors
	the availability of an adequate supply of	the quality reports provided by drinking
	quality drinking water and maintain a	water suppliers and implements regular
	hygienic working environment,	cleaning and sanitation practices. This
	particularly in cases where water quality	ongoing commitment ensures the
	and quantity concerns may arise.	continued trust and reliability of both
		employees and customers.
		continued trust and reliability of both

W1.2b

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

	Volume (megaliters/year)	Comparison with previous reporting year	Primary reason for comparison with previous reporting year	Five-year forecast	Primary reason for forecast	Please explain
Total withdrawals	220.86	About the same	Facility expansion	About the same	Increase/decrease in efficiency	Halkbank's facilities include department heads, headquarters, and branches. Total water withdrawal of facilities 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. While this value was 213.27 megaliters in 2021, it increased to 220.86 megaliters in 2022. Since the discharge volume increased due to the 20 branches opening in 2022, the decrease in water



						consumption because of the IT and call center departments working entirely from home caused a 4% change in total. Halkbank defines changes in values between 5% and 15% as "high" or "low," and changes more than 15% as "much higher" or "much lower". Hence, the bank considers the 4% increase in total water withdrawal to be about the same. In line with its sustainable growth strategy, Halkbank has set a target to establish 85 branches within a five-year period. As part of this approach, the bank aims to optimize resource utilization by implementing efficiency practices and conducting employee awareness training specifically focused on water withdrawal, water discharge, and water consumption volumes. By ensuring the same amount of usage, Halkbank strives to achieve sustainable growth while optimizing its resource management.
Total discharges	215.09	About the same	Facility expansion	About the same	Increase/decrease in efficiency	Halkbank's facilities include department heads, headquarters, and local and foreign branches. The total discharge is directly related to the total withdrawals from the municipalities. The total water discharge volume, which was 206.20 megaliters in 2021, increased to 215.09 in 2022. Halkbank's return to pre-pandemic conditions with a hybrid system and the opening of 20 new



						branches resulted in an increase of 4% in the total discharge volume. Halkbank defines changes in values between 5% and 15% as "high" or "low," and changes more than 15% as "much higher" or "much lower". The bank considers this 4% change about the same. In line with its sustainable growth strategy, Halkbank has set a target to establish 85 branches within a five-year period. As part of this approach, the bank aims to optimize resource utilization by implementing efficiency practices and conducting employee awareness training specifically focused on water withdrawal, water discharge, and water consumption volumes. By ensuring the same amount of usage, Halkbank strives to achieve sustainable growth while optimizing its resource management.
Total consumption	5.77	Much lower	Other, please specify Reduction in the number of employees due to remote working system	About the same	Increase/decrease in efficiency	Halkbank's facilities include department heads, headquarters, and local and foreign branches. The total consumption is equal to the total water purchased for the consumption of the personnel. The total water consumption volume, which was 7.07 megaliters in 2021, decreased to 5.77 in 2022. Although new personnel was recruited in 2021, there was a 18% decrease in water consumption as IT and call center units started



	working entirely at home. Halkbank defines changes in values between 5% and 15% as "high" or "low," and changes more than 15% as "much higher" or "much lower". The bank considers this 18% change as much lower.
	In line with its sustainable growth strategy, Halkbank has set a target to establish 85 branches within a five-year period. As part of this approach, the bank aims to optimize resource utilization by implementing efficiency practices and conducting employee awareness training specifically focused on water withdrawal, water discharge, and water consumption volumes. By ensuring the same amount of usage, Halkbank strives to achieve sustainable growth while optimizing its resource management.

W1.2d

(W1.2d) Indicate whether water is withdrawn from areas with water stress, provide the proportion, how it compares with the previous reporting year, and how it is forecasted to change.

Withdrawals	%	Comparison	Primary	Five-	Primary reason	Identification	Please explain
are from areas	withdrawn	with previous	reason for	year	for forecast	tool	
with water	from areas	reporting year	comparison	forecast			
stress	with water		with previous				
	stress		reporting year				



Row	Yes	76-99	About the	Facility	About	Increase/decrease	WRI	Halkbank evaluates several factors
1			same	expansion	the same	in efficiency	Aqueduct	such as water quality and quantity in
						·		the regions where it operates within
								the framework of the environmental
								management system using the WRI
								Aqueduct Tool, a tool whose basin
								breakdown is consistent with
								Turkey's local breakdown. Halkbank
								assesses the water stress risk for the
								current situation with the WRI
								Aqueduct Tool by using the latitude
								and longitude information of the
								regions in which it operates.
								Halkbank's evaluations are reported
								quarterly to the Sustainability
								Committee and the Board of
								Directors. Every month, the
								Sustainability Practices,
								Environment, and Energy
								Management department monitors
								the withdrawal volume. Furthermore,
								Halkbank includes the Turkey
								Drought Map, which is published
								quarterly by Turkey's Ministry of
								Environment, Urbanization, and
								Climate Change, in its evaluations.
								The Standardized Precipitation Index
								(SPI) technique is used to produce



		this map.
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		According to the risk assessment of water stress in 2022, 42% of Halkbank's facilities are located in extremely high-risk cities, while 43% are located in high-risk cities. The overall water withdrawals from units in the extremely high and high regions account for 86% of the 2022 withdrawals, and it is around 190 megaliters. The rate of withdrawal in
		areas with water stress increased by 4% in 2022 as a result of the 20 branches opened in these locations. Halkbank defines changes in values between 5% and 15% as "high" or "low," and changes more than 15% as "much higher" or "much lower". The bank considers this 4% change about the same.
		In line with its sustainable growth strategy, Halkbank has set a target to establish 85 branches within a five-year period. As part of this approach, the bank aims to optimize resource utilization by implementing efficiency practices and conducting employee



		awarene	ess training specifically
		focused	on water withdrawal, water
		discharg	e, and water consumption
		volumes	. By ensuring the same
		amount	of usage, Halkbank strives to
		achieve	sustainable growth while
		optimizii	ng its resource management.

W1.2h

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

	Relevance	Volume (megaliters/year)	Comparison with previous reporting year	Primary reason for comparison with previous reporting year	Please explain
Fresh surface water, including rainwater, water from wetlands, rivers, and lakes	Not relevant				Halkbank only uses the water supplied by the municipality and local drinking water suppliers in all its facilities which are department heads, headquarters, and branches. The Bank 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 only uses the water supplied by the municipality and local drinking water suppliers in all its facilities which are department heads, headquarters, and branches. The Bank does not purify or use brackish or sea water in any of its facilities.



Groundwater – renewable	Not relevant				Halkbank only uses the water supplied by the municipality and local drinking water suppliers in all its facilities which are department heads, headquarters, and branches. No groundwater is drawn in any of its facilities throughout the country.
Groundwater – non- renewable	Not relevant				Halkbank only uses the water supplied by the municipality and local drinking water suppliers in all its facilities which are department heads, headquarters, and branches No groundwater is drawn in any of its facilities throughout the country.
Produced/Entrained water	Not relevant				Halkbank only uses the water supplied by the municipality and local drinking water suppliers in all its facilities which are department heads, headquarters, and branches There is no water production in any of its branches.
Third party sources	Relevant	220.86	About the same	Facility expansion	Quality and sufficient amount of water are required for WASH in all facilities which are department heads, headquarters, and branches. Water is obtained from third-party sources such as municipal water and local drinking water. While the total water withdrawal value in 2021 was 213.27 megaliters, this value increased to 220.86 megaliters in 2022 Since the discharge volume increased due to the 20 branches opened in 2022, the decrease in water consumption because of the IT and call center departments working entirely from home caused a 4% change in total.
					Halkbank defines changes in values between 5% and



	15% as "high" or "low," and changes more than 15% as
	"much higher" or "much lower". Hence, the Bank
	considers the 4% increase in total water withdrawal to
	be about the same.
	Halkbank intends to establish 85 branches during the
	next five years. It estimates that the total volume of
	withdrawal will be about the same with efficiency
	practices and awareness training.

W1.2i

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

	Relevance	Volume (megaliters/year)	Comparison with previous reporting year	Primary reason for 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	215.09	About the same	Facility expansion	In the Halkbank, the amount of water discharge is equal to the amount of water drawn from the municipal water network. All of



the wastewater is discharged into sewer systems managed by municipalities. The principles of the Regulation on Discharge of Wastewater to the Sewerage Network are determined by the municipalities.
The total water discharge volume, which was 206.20 megaliters in 2021, increased to 215.09 in 2022. Halkbank's return to prepandemic conditions with a hybrid system and the opening of 20 new branches resulted in an increase of 4% in the total discharge volume.
Halkbank defines changes in values between 5% and 15% as "high" or "low," and changes more than 15% as "much higher" or "much lower". The Bank considers this 4% change almost the same. This figure is expected to be about the same with the efficiency approaches and awareness training to be implemented against the 85 branches planned to be opened.

W1.2j

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

	Relevance of treatment level to discharge	Volume (megaliters/year)		% of your sites/facilities/operations this volume applies to	Please explain
Tertiary treatment	Not relevant				Domestic wastewater is not treated at any of the bank's facilities 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 at any of the bank's facilities 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 at any of the bank's facilities 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	215.09	About the same	Facility expansion	100%	Halkbank uses municipal water in all its facilities which are department heads, headquarters, and branches. 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. Each municipality in
			Turkey's 81 provinces has its own
			infrastructure, and the municipalities
			also control the infrastructure of the
			cities. Wastewater is treated by the
			Ministry of Environment, Urbanization
			and Climate Change in compliance
			with the Turkish Environmental Law
			and the Urban Wastewater Treatment
			Regulation.
			The total water discharge volume,
			which was 206.20 megaliters in 2021,
			increased to 215.09 in 2022.
			Halkbank's return to pre-pandemic
			conditions with a hybrid system and
			the opening of 20 new branches
			resulted in an increase of 4% in the
			total discharge volume. Halkbank
			defines changes in values between
			5% and 15% as "high" or "low," and
			changes more than 15% as "much
			higher" or "much lower". The Bank
			considers this 4% change about the
			same.
			This figure is expected to be about the
			same with the efficiency approaches



				and awareness trainings to be implemented against the 85 branches planned to be opened.
Other	Not relevant			Domestic wastewater is not treated at any of the bank's facilities 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	160,559,011,000	220.86	726,971,887.168342	Halkbank has set a target to establish 85 branches within a five-year period. As part of its sustainable growth strategy, the bank aims to optimize resource utilization by implementing efficiency practices and conducting employee awareness training specifically focused on water withdrawal volumes. By ensuring the same amount of usage, Halkbank strives to achieve sustainable growth while optimizing its resource management. Therefore, it is estimated that the efficiency value will increase.

W1.4

(W1.4) Do any of your products contain substances classified as hazardous by a regulatory authority?



	Products contain hazardous substances	Comment
Ro	v No	Halkbank uses municipal water in all its facilities which are department heads, headquarters, and branches. The Bank uses water to carry out operational activities and to meet the clean water and daily needs of employees. Halkbank, as a financial institution, does not have any products or effects in its direct operations that are categorized as hazardous chemicals according to the regulations.

W1.5

(W1.5) Do you engage with your value chain on water-related issues?

	Engagement
Suppliers	Yes
Other value chain partners (e.g., customers)	Yes

W1.5a

(W1.5a) Do you assess your suppliers according to their impact on water security?

Row 1

Assessment of supplier impact

Yes, we assess the impact of our suppliers

Considered in assessment

Basin status (e.g., water stress or access to WASH services)

Supplier dependence on water

Supplier impacts on water availability

Supplier impacts on water quality



Number of suppliers identified as having a substantive impact

80

% of total suppliers identified as having a substantive impact

51-75

Please explain

If the supplier's water source is derived from water-stressed areas, and the supplier's daily water consumption exceeds 1000 m3, the impacts of that supplier are considered significant.

Halkbank's Tier 1 suppliers primarily consist of card manufacturers, technology, and consultancy service providers. According to the defined threshold, only drinking water suppliers have a significant impact on water resources. The bank has two main drinking water suppliers. In some provinces, purchases can also be made outside of these suppliers. The bank has a total of 136 major suppliers, and the percentage of suppliers with a significant impact is considered to be 60%.

As drinking water is a fundamental necessity, the Bank places specific emphasis on assessing the basin status via WRI Aqueduct Tool, their reliance, and their potential impact on water resources. By evaluating the operations of drinking water suppliers, the bank ensures the maintenance of a sustainable water supply.

W1.5b

(W1.5b) Do your suppliers have to meet water-related requirements as part of your organization's purchasing process?

	Suppliers have to meet specific water-related requirements	
Row 1	Yes, water-related requirements are included in our supplier contracts	

W1.5c

(W1.5c) Provide details of the water-related requirements that suppliers have to meet as part of your organization's purchasing process, and the compliance measures in place.



Water-related requirement

Complying with a water-related certification

% of suppliers with a substantive impact required to comply with this water-related requirement 100%

% of suppliers with a substantive impact in compliance with this water-related requirement 100%

Mechanisms for monitoring compliance with this water-related requirement

Certification

On-site third-party audit

Response to supplier non-compliance with this water-related requirement

Retain and engage

Comment

It is expected that all bank's suppliers adopt local regulations pertaining to combating climate change and adhere to Halkbank's policies. In instances where deemed necessary by the bank, suppliers should be able to provide documentation, reports or certificates to substantiate their compliance with bank's sustainability policies pertaining to sustainability. By establishing this requirement, the Bank aims to ensure that its suppliers actively contribute to its sustainability objectives and align their practices with its sustainability framework

The bank reserves the right, when deemed necessary, to conduct audits or engage a third party to verify the supplier's operations, standards, or other documents for compliance with Halkbank's policies. In case of any non-compliance, the bank first warns the supplier and continues to interact. If suppliers fail to meet the criteria embraced by Halkbank policies, the bank has the authority to terminate its business relationship with the supplier



Providing fully-functioning, safely managed WASH services to all workers

% of suppliers with a substantive impact required to comply with this water-related requirement 100%

% of suppliers with a substantive impact in compliance with this water-related requirement 100%

Mechanisms for monitoring compliance with this water-related requirement

Certification

On-site third-party audit

Response to supplier non-compliance with this water-related requirement

Retain and engage

Comment

Within the scope of Halkbank's Sustainable Procurement Policy, all suppliers are expected to prioritize key sustainability-related issues such as combating climate change, environmental health, quality, business ethics, human and labor rights, and occupational health and safety in the execution of their activities. By establishing this requirement, the Bank aims to ensure that its suppliers actively contribute to its sustainability objectives and align their practices with its sustainability framework.

The bank reserves the right, when deemed necessary, to conduct audits or engage a third party to verify the supplier's operations, standards, or other documents for compliance with Halkbank's policies. In case of any non-compliance, the bank first warns the supplier and continues to interact. If suppliers fail to meet the criteria embraced by Halkbank policies, the bank has the authority to terminate its business relationship with the supplier

Water-related requirement

Substituting hazardous substances with less harmful substances

% of suppliers with a substantive impact required to comply with this water-related requirement



100%

% of suppliers with a substantive impact in compliance with this water-related requirement 100%

Mechanisms for monitoring compliance with this water-related requirement

Certification

On-site third-party audit

Response to supplier non-compliance with this water-related requirement

Retain and engage

Comment

Within the framework of Halkbank's Sustainable Procurement Policy, all suppliers are expected to demonstrate sensitivity towards environmental issues and make efforts to limit their environmental impacts. Suppliers are also expected to prioritize the use of environmentally friendly materials. By establishing this requirement, the Bank aims to ensure that its suppliers actively contribute to its sustainability objectives and align their practices with its sustainability framework.

The bank reserves the right, when deemed necessary, to conduct audits or engage a third party to verify the supplier's operations, standards, or other documents for compliance with Halkbank's policies. In case of any non-compliance, the bank first warns the supplier and continues to interact. If suppliers fail to meet the criteria embraced by Halkbank policies, the bank has the authority to terminate its business relationship with the supplier

W1.5d

(W1.5d) 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

% of suppliers by number

51-75

% of suppliers with a substantive impact

100%

Rationale for your engagement

Sustainable water management is not only Halkbank's responsibility but also a shared commitment with its suppliers and stakeholders.

Under Halkbank's Water Policy, the bank is committed to collaborating with stakeholders to reduce water consumption and water pollution in the value chain, promote efficient water use, increase stakeholders' awareness of water management, and assist them in improving resource utilization through appropriate training when necessary. Additionally, as part of the Sustainable Procurement Policy, the bank organizes training sessions for suppliers to enhance their sustainability awareness as deemed necessary.

By organizing sustainability training that encompasses water management, Halkbank aims to raise awareness and enhance the knowledge and capabilities of its suppliers and stakeholders in effectively managing water resources.

Impact of the engagement and measures of success

- i) One of the beneficial water-related outcomes of educating suppliers about water stewardship is the adoption of water conservation and efficiency measures by the Bank's suppliers and stakeholders. Through the knowledge and skills gained from the sustainability training, they can implement practical solutions to reduce water consumption in their operations. A supplier who previously used water-intensive processes may learn about alternative methods that require less water or implement technologies that enable water recycling and reuse. By optimizing their water use, they not only contribute to preserving water resources but also reduce their operational costs.
- ii) The bank's primary objective is for its suppliers to implement successful sustainable water management practices without the need for extensive training. The success of the engagement activity is demonstrated by the participation of at least 50% of non-compliant suppliers in the



training and their ability to present improvements in the post-training evaluation surveys.

Comment

The bank has a total of 136 major suppliers, and the percentage of suppliers with a significant impact is considered to be 60% by number. The bank has interacted with all suppliers who have a substantive impact, so the percentage of suppliers with a substantive impact has been selected as 100%.

W1.5e

(W1.5e) Provide details of any water-related engagement activity with customers or other value chain partners.

Type of stakeholder

Customers

Type of engagement

Education / information sharing

Details of engagement

Educate and work with stakeholders on understanding and measuring exposure to water-related risks

Rationale for your engagement

Within the scope of its sustainability and environmental policy, which the Bank 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. 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.

Impact of the engagement and measures of success

The beneficial outcomes of the participation activity related to water are as follows: The training programs provided by Halkbank contribute to KOBİ customers adopting sustainability principles in their operations, learning about climate-related risks, and promoting sustainable water management. Additionally, they raise awareness about reducing water pollution and controlling waste generation. The bank encourages the efficient use of water resources while benefiting businesses both financially and environmentally.

Success Criterion: The success criteria for these trainings are the number of views and readings. By the end of 2022, the average number of views and readings for sustainability training has reached 3500, which the bank considers to be quite high.

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.



Turkey
Other, please specify
Mediterranean Sea, East Coast

Type of impact driver & Primary impact driver

Acute physical Flood (coastal, fluvial, pluvial, groundwater)

Primary impact

Impact on company assets

Description of impact

As a result of the flood disaster that happened in Antalya, Kumluca in 2022, one of Halkbank's branches' archives, system room, and water tank were submerged in 1 meter of water. Furthermore, the electrical panel, generator, air conditioners, and other equipment were all damaged. For two days, the branch was unable to operate.

Primary response

Improve maintenance of infrastructure

Total financial impact

118.607.14

Description of response

The branch affected by the flood was renovated and the renovation costs amounted to 118,607.14 TRY. The Bank's Business Continuity Emergency and Contingency Plan Directive defines actions in the event of any natural disaster. Following a natural disaster, branches are positively distinguished from other structures. Despite the fact that the financial impact of the Kumluca accident was less than 0.05% on revenue, the post-disaster crisis team followed the process and determined strategies according to the deficiencies:

After the resolution of the urgent and unexpected incident, taking into account the condition of the location, the Business Continuity
Representative contacts the Construction Expertise and Real Estate Management Department, the Information Technology Operations
Department and the Support and Procurement Services Department to assess the damages in the region. If there is any disruption or
malfunction in the communication systems, local telecommunications authorities are contacted to address the issue. The Business Continuity



Representative evaluates whether the incurred damage poses a threat to the continuity of services, and ensures the continuity of the existing measures or takes new actions accordingly. Based on the assessments if the process is expected to be prolonged, the Branch/Regional Coordination Center assigns alternative locations for the personnel of the NOM/Regional Coordination Center.

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?

	Water-related regulatory violations	Comment	
Row 1	No	N/A	

W3. Procedures

W3.1

(W3.1) Does your organization identify and classify potential water pollutants associated with its activities that could have a detrimental impact on water ecosystems or human health?

	Identification and classification of potential water pollutants	How potential water pollutants are identified and classified
Row 1	our potential water pollutants	i) Details of the processes: Halkbank conducts the environmental impact assessment of company activities within the scope of risk assessment in its financing processes, based on the Company Rating Guide (CRG). In determining the potential impacts of planned projects, Environmental Impact Assessment is always carried out to identify measures that prevent or minimize adverse effects. The assessment also includes monitoring of project implementation. In this evaluation, companies are scored based on various environmental risks, including climate risks, energy and water supply, and their impact on natural resources.



- ii) Details of an established standard: Halkbank commits to complying with all national and international laws related to the environment, within the scope of its Water Policy. In this regard, when creating CRG, the bank references the Environmental Impact Assessment Regulation published by the Ministry in terms of Sustainability and Environmental criteria. Additionally, sectors that are subject to Environmental Impact Assessment regulations and have high water pollution potential or intensive water usage are also obliged to comply with the Water Pollution Control Regulation.
- iii) Description of the metrics: The controlled parameters may vary depending on the sector; however, companies are obliged to comply with the limit values of TSS (Total Suspended Solids), COD (Chemical Oxygen Demand), and BOD (Biochemical Oxygen Demand) (mg/L) as specified in this regulation.

W3.1a

(W3.1a) Describe how your organization minimizes the adverse impacts of potential water pollutants on water ecosystems or human health associated with your activities.

Water pollutant category

Other physical pollutants

Description of water pollutant and potential impacts

i) Potential impact of cooling water:

The use of cooling water in hydroelectric power plants (HEPPs) is essential to dissipate the heat generated during electricity generation. This water is utilized in a separate loop to prevent any pollution risk or contamination. However, it is important for HEPPs to regularly monitor the cooling water to ensure its quality and prevent any potential contamination. In addition, HEPPs may have the following potential pollutant effects:

- The release of water from the reservoir can alter the temperature, dissolved oxygen levels, and nutrient concentrations downstream, potentially affecting aquatic life.



- Accidental oil spills from equipment or machinery in HEPPs can have detrimental effects on water quality and aquatic ecosystems.
- The trapping of sediment behind dams can disrupt downstream sediment transport processes, leading to erosion or deposition issues in river channels.

Due to these effects, it is important for hydroelectric power plants to conduct periodic analyses to assess the risk of pollution. These analyses should include the examination of parameters such as pH, total suspended solids (TSS), oxygen saturation, electrical conductivity, and free chlorine. Additionally, regular monitoring of the equipment is crucial.

Value chain stage

Product use phase

Actions and procedures to minimize adverse impacts

Beyond compliance with regulatory requirements

Provision of best practice instructions on product use

Please explain

- ii) Procedures selected manage the risks of the potential impacts: According to the Environmental Impact Assessment (EIA) Regulation, companies operating in sectors listed in Annex I and Annex II are required to obtain an EIA report. In cases where this document is not available, the Ministry imposes penalties. HEPPs are among the sectors subject to the EIA regulation. Before providing financing for HEPP projects, the bank examines the geological and hydrogeological characteristics of the environment that may be affected by the project, as well as water conditions, climatic factors, and groundwater changes that could affect protected areas. Furthermore, the assessment considers the identification of potential issues that could impact the environment, the quantity of pollutants, and their interaction with the receiving environment.
- iii) How success is measured and evaluated: HEPP projects that are eligible for financing and have received a low-risk score undergo site visits and annual inspections conducted by accredited validators. These power plants are required to comply with ISO standards, especially ISO 14001, have an emergency notification system in place, adhere to the Environmental Permit, and ensure that their analyses comply with the Wastewater Control Regulation. In addition, these facilities are required to get one wastewater sample every four months per the permit. In the regular inspections conducted, the absence of any non-compliance is considered successful.



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

Product use phase

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?

More than 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

Impact on human health

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.

	Rationale for approach to risk assessment	Explanation of contextual issues considered	Explanation of stakeholders considered	Decision-making process for risk response
Row	As a financial institution, Halkbank	Halkbank uses water as a part of WASH	Water-related risks may affect the	Experienced or potentially harmful
1	is aware that the Bank has an	in its direct operations. In addition, the	repayment ability of customers,	water-related effects are always
	impact on every stage of the value	water use of the customers, especially	especially those in the agricultural	considered as part of the risk
	chain with its operations. For this	for agriculture and hydroelectric power	sector, which creates credit risk for	assessment process. As a result of
	reason, all specified stakeholders	plant projects, is quite high. Since water	the bank.	the evaluation, possible material
	and concerns are fully integrated	quality has a direct impact on human		damage, loss of income, and
	into the bank's risk assessment	health, the bank considers it in both	The Bank includes its employees	inability to operate are taken into
	system within the scope of its	direct and indirect activities. Therefore,	in the evaluation with the principle	consideration, and customers are
	medium (3-10 years) and long-	the water availability and quality at a	of WASH as it carries operational	questioned in this context during
	term (10-100 years) strategies.	basin level is very important for the Bank	and reputational risks for its	the environmental and social
		in both direct and indirect use and is	operations.	impact assessment process. Risks
	Halkbank's operational risks	considered part of the risk assessment		are evaluated from a global
	include loss of income as a result	process.	Relationships between the bank	perspective at least four times a
	of flooding that may cause		and investors are important in	year at Sustainability Committee
	property and asset damage, not	Failure to comply with water regulations	terms of access to foreign funds.	meetings, once a month at
	being able to get clean water and	and having a negative impact on the	Many international funds require	Sustainability Coordination group
	the spread of infection are possible	ecosystem or habitat status poses both	individuals to have standard	meetings, and once a year in
	water-related risks. Therefore, as	regulatory and reputational risks for the	practices in their activities and to	management reviews of the Board
	part of the risk assessment	bank. Therefore, during the	consider environmental issues in	of Directors. By sharing the
	process, the Bank evaluates the	environmental and social impact	loan allocation.	experiences of different business
	quantitative analysis such as water	assessment process, environmental		units, emerging issues are brought
	stress risk, and qualitative analysis	legislation/legislation changes are	Conflicts that may arise with the	to the agenda, possible solutions



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 a tool and resource in determining risks and internal methods. In order to establish an effective risk assessment process during the development of internal methods, expert external consultants are also sought for consultation.

After identifying these risks, the Bank integrates the outputs into the Environmental and Social Impact Assessment as an internal method created within the company

followed, revisions are made in the domestic legislation and necessary steps are taken.

The Bank is committed to protecting reports and databases are used as 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.

projects to be financed carry a reputational risk for the bank. Therefore, they are included in the assessment. 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.

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

views of local people and NGOs in 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.



	municipal water, local water	
	services are also taken into	
	account in 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, 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 TRY 55,000,000 to be experienced on an annual basis or in a single event can be considered to have a significant financial impact on 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	178	1-25	The banking industry commonly encounters risks associated with water from the businesses it supports, which can pose a significant threat to their operations. One of the most critical risks in this regard is the possibility of severe physical damage caused by flooding. After considering both financial factors and the risk of water stress, it has been assessed that out of the bank's total of 1,032 branches, 178 facilities are susceptible to strategic impacts and potential damage in the event of a 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
Mediterranean Sea, East Coast

Number of facilities exposed to water risk

63

% company-wide facilities this represents

1-25

% company's total global revenue that could be affected

1-10

Comment

N/A

Country/Area & River basin

Turkey
Tigris & Euphrates

Number of facilities exposed to water risk

115



% company-wide facilities this represents

1-25

% company's total global revenue that could be affected

11-20

Comment

N/A

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
Mediterranean Sea, East Coast

Type of risk & Primary risk driver

Acute physical Flood (coastal, fluvial, pluvial, groundwater)

Primary potential impact

Impact on company assets

Company-specific description

According to the Climate Assessment Report for Turkey in 2022, prepared by the General Directorate of Meteorology (MGM), there were 1030 extraordinary weather events last year. There has been an increasing trend in extreme weather events, especially over the past 20 years. These extreme weather events have the potential to cause significant damage to the bank's physical infrastructure, including its branches,



offices, and data centers. The impact can range from structural damage to operational disruptions, leading to costly repairs and downtime. Furthermore, such flooding incidents can disrupt day-to-day operations, resulting in branch closures or restricted access to facilities. This disruption can have adverse effects on customer service, transaction processing, and overall business continuity.

An example of an extreme weather event experienced by Halkbank in 2022 would be the flood disaster in Kumluca, Antalya. During this incident, one of Halkbank's branches suffered significant damage. The archives, system room, and water tank of the branch were submerged in approximately 1 meter of water. Additionally, the electrical panel, generator, air conditioners, and other equipment were all affected and rendered inoperable. As a result, the branch was unable to operate for a period of two days.

Timeframe

Current up to one year

Magnitude of potential impact

Medium-low

Likelihood

Very likely

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact figure (currency)

118,607.14

Potential financial impact figure - minimum (currency)

Potential financial impact figure - maximum (currency)

Explanation of financial impact



The branch affected by the flood was renovated and the renovation costs amounted to 118,607.14 TRY.

Primary response to risk

Increase insurance coverage

Description of response

It is expected that the severity of acute physical risks will increase every year due to climate change. Therefore, The Bank's Business Continuity Emergency and Contingency Plan Directive defines actions in the event of any natural disaster. Following a natural disaster, branches are positively distinguished from other structures. Even though the financial impact of the Kumluca accident was less than 0.05% on revenue, the post-disaster crisis team followed the process and determined strategies according to the deficiencies:

- After the resolution of the urgent and unexpected incident, taking into account the condition of the location, the Business Continuity Representative contacts the Construction Expertise and Real Estate Management Department, the Information Technology Operations Department, and the Support and Procurement Services Department to assess the damages in the region.
- If there is any disruption or malfunction in the communication systems, local telecommunications authorities are contacted to address the issue.
- -The Business Continuity Representative evaluates whether the incurred damage poses a threat to the continuity of services, and ensures the continuity of the existing measures or takes new actions accordingly.
- Based on the assessments if the process is expected to be prolonged, the Branch/Regional Coordination Center assigns alternative locations for the personnel of the NOM/Regional Coordination Center.

In addition to the measures mentioned above, the most important action taken by the bank to cover damages caused by climate-related risks such as heavy rainfall and floods is to renew comprehensive insurance coverage, including water risks, every year.

Cost of response

145,000,000

Explanation of cost of response



In addition to the measures, the bank renews its comprehensive insurance coverage to cover the damages caused by climate-related risks such as extreme rainfall. In 2022, the cost paid for insurance coverage is 145,000,000 TRY.

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

Halkbank contributes to Turkey's transition to a low-carbon economy by reducing dependency on energy imports through its sustainable financing initiatives. In line with this objective, the bank's portfolio of supported energy investments increasingly includes renewable energy and energy-saving projects such as hydroelectric power plants (HEPP), wind power plants (WPP), solar power plants (SPP), and bioenergy power plants (BPP). In 2022, the bank's financing for renewable energy power plants resulted in a reduction of 502,075 tons of CO2e emissions.

Until 2021, Halkbank had been providing the most financing for HEPP facilities in renewable energy projects. However, due to the high risk of



water-related credit risk in regions with high water stress, these HEPP projects are evaluated as having water-sourced credit risk. Two of these HEPP facilities are located in the Tigris – Euphrates River, which were identified to have a high water stress risk using the WRI Aqueduct Tool. In 2022, the bank balanced its portfolio in renewable energy credit distribution to mitigate HEPP risks, with a distribution of 69% for solar power plants (GES), 17% for hydroelectric power plants (HES), and 14% for bioenergy power plants (BPP).

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 two HEPP located in the Euphrates-Tigris River, which have 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 TRY.



Primary response to risk

Direct operations

Develop new products and/or markets

Description of response

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 HEPP, 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 HEPP. In addition, Türkiye's electricity production was 10,8% from wind and 4,7% from solar in 2022. According to Turkey's National Energy Plan published in 2022, it is aimed that the share of the SPP in energy production will be 16.5% and WPP will be 17.7% in 2035. Halkbank evaluates annually the financing distribution of its portfolio. The renewable energy loan distribution in 2022 has been balanced within the portfolio as SPP, HEPP, and BPP, respectively. In 2022, the percentage of SPP among all resources in the Bank's renewable energy loans increased by 40% from the previous year to 69%.

Cost of response

2,403,907,813.56

Explanation of cost of response

Halkbank provided 1,741,354,620.49 TRY for SPP projects and 349,000,000 TRY for BPP projects in 2022. Halkbank, which provides the portfolio distribution at this rate against the risks of HEPP projects, provided a total of 2,090,354,620.49 TRY in financing. The interest income of these loans is estimated as 15% of the amounts given, corresponding to approximately 313,553,193.07 TRY. The cost of response has been calculated as 2,403,907,813.56 TRY with the sum of these two values (2,090,354,620.49+(2,090,354,620.49*0.15)).

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 HEPP, 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 HEPP. In addition, Turkey's electricity production was 10,8% from wind and 4,7% from solar in 2022. According to Turkey's National Energy Plan published in 2022, it is aimed that the share of the SPP in energy production will be 16.5% and WPP will be 17.7% in 2035. Halkbank evaluates annually the financing distribution of its 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 HEPPs until 2021, the Bank re-established the balance in its portfolio 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 2022 has been balanced within the portfolio as SPP, HEPP, and BPP, respectively. In 2022, the percentage of SPP



among all resources in the Bank's renewable energy loans increased by 40% from the previous year to 69%.

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)

313,553,193.07

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. Turkey's electricity production was 10,8% from wind and 4,7% from solar in 2022. In response to the potential drought-related risks by hydroelectric power plants in the future, Halkbank balanced its renewable energy loan distribution within the portfolio as SPP, HEPP, and BPP, respectively in 2022. Halkbank provided 1,741,354,620.49 TRY for SPP projects and 349,000,000 TRY for BPP projects in 2022. Halkbank, which provides the portfolio distribution at this rate against the risks of HEPP projects, provided a total of 2,090,354,620.49 TRY in financing. The ratio of SPP financings in the total renewable project portfolio has increased to 69% in 2022. The interest income of these loans is estimated as 15% of the amounts given, corresponding to approximately 313,553,193.07 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)

63 Branches located in the Mediterranean Sea, East Coast basin

Country/Area & River basin

Turkey
Other, please specify
Mediterranean Sea, East Coast

Latitude

40.14672

Longitude

26.408587

Located in area with water stress

Yes

Total water withdrawals at this facility (megaliters/year)

9.93



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

9.93

Total water discharges at this facility (megaliters/year)

9.56

Comparison of total discharges with previous reporting year

About the same

Discharges to fresh surface water

0

Discharges to brackish surface water/seawater

0



Discharges to groundwater

0

Discharges to third party destinations

9.56

Total water consumption at this facility (megaliters/year)

0.37

Comparison of total consumption with previous reporting year

Much higher

Please explain

The water accounting data of the branches, which is located in the Mediterranean Sea, East 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 the third party are calculated as 0.

Facility reference number

Facility 2

Facility name (optional)

115 Branches located in the Tigris-Euphrates basin

Country/Area & River basin

Turkey
Tigris & Euphrates



Latitude

37.889516

Longitude

41.129283

Located in area with water stress

Yes

Total water withdrawals at this facility (megaliters/year)

22.57

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

22.57



Total water discharges at this facility (megaliters/year)

22.13

Comparison of total discharges with previous reporting year

About the same

Discharges to fresh surface water

0

Discharges to brackish surface water/seawater

0

Discharges to groundwater

0

Discharges to third party destinations

22.13

Total water consumption at this facility (megaliters/year)

0.44

Comparison of total consumption with previous reporting year

Much lower

Please explain

The water accounting data of the branches, which is located in the Tigris-Euphrates, and has a strategic effect, specified in the 2nd 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 the third party are 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

ISO 14046:2016

Water withdrawals - volume by source

% verified

76-100

Verification standard used

ISO 14046:2016

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

ISO 14046:2016

Water discharges – volume by destination

% verified

76-100

Verification standard used

ISO 14046:2016

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 ISO 14046:2016.

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

ISO 14046:2016

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





Commitment to water stewardshi and/or collective action Commitment to the conservation of freshwater ecosystems Commitments beyond regulatory compliance Reference to company water-related targets Acknowledgement of the human right to water and sanitation Recognition of environmental	These commitments demonstrate the Bank's dedication to prioritizing access to clean and safe water while striving for sustainable water management and contributing to the improvement of broader ecosystem quality. You can access the relevant policies via the link: https://www.halkbank.com.tr/en/investor-relations/corporate-governance/sustainability.html
linkages, for example, due to climate change	

⁰ ¹WATER POLICY.pdf

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	Responsibilities for water-related issues
individual or	
committee	



Board-level committee

The Sustainability Committee consists of 20 members at the level of two Board Members, five Deputy General Managers, one Group President, 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.

Examples of water-related decisions: The energy, environment, and water management performance of the branches is monitored with the software called IKLIM, 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 and has decided to establish a Climate Action Plan. In 2022, Halkbank released its Water Policy and Sustainable Procurement Policy as subcomponents of its Sustainability Policy. Furthermore, the Bank calculated its Water Footprint for the reporting year for the first time and established a target for reducing per capita water consumption at the branch level in accordance with its commitments

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		The Board of Directors, through the participation of two members (at the President and Vice President level), oversees the management of sustainability by joining the Sustainability Committee. The committee convenes regular meetings at least four times a year. During these scheduled meetings, an assessment of risks and opportunities related to sustainability



Monitoring progress towards corporate targets Overseeing and guiding scenario analysis Overseeing major capital expenditures Overseeing the setting of corporate targets Overseeing value chain engagement Providing employee incentives Reviewing and guiding annual budgets Reviewing and guiding business plans Reviewing and guiding corporate responsibility strategy Reviewing and guiding major plans of action Reviewing and guiding risk management policies Reviewing and guiding strategy Reviewing innovation/R&D priorities

issues with scenario analysis, including water matters, takes place, and targets are established. Budget adjustments and performance targets are deliberated and determined through a majority vote to attain the set objectives. Furthermore, periodic performance evaluations compare the achieved targets with the predetermined results, leading to necessary revisions. Decisions regarding the recognition of performance on sustainability matters are also made during these regular sessions of the Sustainability Committee.

Moreover, the presence of the Deputy General Manager responsible for credit policies and the department head in the committee allows for the direct integration of water-related concerns into credit policies.

The Sustainability Committee may also convene for urgent and significant matters that arise outside the regular meeting schedule. The Manager of Sustainability Practices, Environment, and Energy Management holds the authority to call for these ad hoc committee meetings. In 2022, the Sustainability Committee convened a total of five times, including a specific meeting designated as the Integrated Management System Management Review Meeting.

Decisions with potential significant outcomes made by the committee are reported to the Board of Directors. Additionally, a Management Review Meeting is held at least once a year to ensure the adequacy and effectiveness of the Bank's sustainability practices. This enables the identification of measures and opportunities to address potential water-related risks.



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	In accordance with Turkish Banking Law and regulations set forth by the Capital Markets Board (CMB), Halkbank adheres to the guidelines governing the election of its Board of Directors. Considering the significance of climate change competence, the board members' level of knowledge and understanding regarding sustainability becomes a pivotal factor. The chairman of the Sustainability Committee, who also serves as a member of the Board of Directors, possesses expertise and training in sustainable development and economics, demonstrating their proficiency in this field. These qualifications align with the board members' competency in addressing climate-related issues. Furthermore, each member of the Sustainability Committee is assigned Key Performance Indicators (KPIs) relating to environmental and sustainability matters. Their proficiency in climate and water-related issues is assessed by evaluating
		their past achievements against these targets, serving as a criterion and substantiating 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

Water-related responsibilities of this position

Assessing future trends in water demand



Assessing water-related risks and opportunities
Managing water-related risks and opportunities
Conducting water-related scenario analysis
Setting water-related corporate targets
Monitoring progress against water-related corporate targets
Managing value chain engagement on water-related issues
Integrating water-related issues into business strategy
Managing annual budgets relating to water security

Frequency of reporting to the board on water-related issues

Quarterly

Please explain

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. As part of the risk assessment, information flow is facilitated through the conduction of research on various scenarios using current trend analyses.

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 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	
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	Contribution of incentives to the achievement of your organization's water commitments	Please explain
Monetary reward	Other C-suite Officer Chairman of Sustainability Committee	Reduction of water withdrawals – direct operations Improvements in water efficiency – direct operations Increased access to workplace WASH – direct operations	Halkbank aims to leave a more sustainable world for future generations by continuously improving its sustainability performance. With the Water Policy, the bank commits to the establishment of long-term strategies, target setting, and action plans in terms of managing efficient water use in its operations and processes, reducing water withdrawal in line with water goals, ensuring access to clean water for employees, and providing a healthy working environment. Halkbank provides incentives, both monetarily and through corporate recognition, to the Chairman of the Sustainability Committee and committee members for selected performance indicators in order to motivate them to achieve the goals. The bank incentivizes employees who demonstrate higher performance in achieving water goals, as well as the Chairman of the Sustainability Committee, for their successful leadership, expertise, and performance in accomplishing the objectives. By rewarding them with bonuses, the	Halkbank is implementing measures to reduce water withdrawals compared to the previous year by optimizing water usage in its business processes, implementing water-saving technologies, and employing methods such as water recycling to enhance water efficiency in line with its strategic objectives encompassing water management. Moreover, the Bank employs the Self-Assessment Tool for Evaluating Access to Water, Sanitation, and Hygiene (WASH) developed by the World Business Council for Sustainable Development (WBSCD) to evaluate its performance. Based on this tool, Halkbank attained a business score of 87% in 2022. The bank is dedicated to guaranteeing employees' access to clean water and fostering a healthy work environment. As a result, it strives to improve its business score to 95% by implementing appropriate enhancements before 2030.



			bank encourages individuals who contribute to the institution's sustainability efforts. This approach motivates responsible individuals to invest more attention and effort, thus aiding in the bank's faster attainment of its goals.	The bank provides monetary and non-monetary rewards to its employees in order to achieve these goals, and has a methodology for calculating the Annual Premium table, which evaluates performance in five different levels. According to this calculation, if there is a high performance, the premium is calculated as "Premium = Gross salary x 1.2". In case of poor performance, the premium is calculated as "Premium = Gross salary x 0.4". The methodology assigns the level 1 benefit to the numeric value closest to achieving the KPI at the end of the year, while the numeric value farthest from the KPI receives a different level.
Non- monetary reward	Other C-suite Officer Chairman of Sustainability Committee	Reduction of water withdrawals – direct operations Improvements in water efficiency –	Halkbank aims to leave a more sustainable world for future generations by continuously improving its sustainability performance. With the Water Policy, the bank commits to the establishment of long-term strategies, target setting, and action plans in terms	Halkbank is implementing measures to reduce water withdrawals compared to the previous year by optimizing water usage in its business processes, implementing water-saving technologies, and employing methods such as
		direct operations Increased access to workplace WASH – direct operations	of managing efficient water use in its operations and processes, reducing water withdrawal in line with water goals, ensuring access to clean water for employees, and providing a healthy working environment.	water recycling to enhance water efficiency in line with its strategic objectives encompassing water management. Moreover, the Bank employs the Self-Assessment
		operations	Halkbank provides incentives, both monetarily and through corporate recognition, to the Chairman of the Sustainability Committee and committee members for selected performance indicators in order to motivate them to achieve the goals.	Tool for Evaluating Access to Water, Sanitation, and Hygiene (WASH) developed by the World Business Council for Sustainable Development (WBSCD) to evaluate its performance. Based on this tool, Halkbank attained a business score of 87% in 2022. The bank is dedicated to



The bank incentivizes employees who demonstrate higher performance in achieving water goals, as well as the Chairman of the Sustainability Committee, for their successful leadership, expertise, and performance in accomplishing the objectives. By rewarding them with bonuses, the bank encourages individuals who contribute to the institution's sustainability efforts. This approach motivates responsible individuals to invest more attention and effort, thus aiding in the bank's faster attainment of its goals.

guaranteeing employees' access to clean water and fostering a healthy work environment. As a result, it strives to improve its business score to 95% by implementing appropriate enhancements before 2030.

The bank provides monetary and non-monetary rewards to its employees in order to achieve these goals, and has a methodology for calculating the Annual Premium table, which evaluates performance in five different levels. According to this calculation, if there is a high performance, the premium is calculated as "Premium = Gross salary x 1.2". In case of poor performance, the premium is calculated as "Premium = Gross salary x 0.4". The methodology assigns the level 1 benefit to the numeric value closest to achieving the KPI at the end of the year, while the numeric value farthest from the KPI receives a different level.

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: Halkbank released its Water Policy and Sustainable Procurement Policy as subcomponents of its Sustainability Policy. Compliance with all activities within policies is ensured by routine inspection of inspection and internal control units. Furthermore, the carbon footprint is calculated on a regular basis in order to meet the policy's aims, and the water withdrawal and consumption data are checked on a regular basis 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 during the audits are reported, examined, and the results are shared with the board of directors. Following that, the relevant departments are informed to take necessary actions. Halkbank negatively evaluates projects in sectors that are permitted and forbidden 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)

0 2022-integrated-annual-report.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	21-30	Environmental, social, and governance (ESG) criteria are gaining increasing significance in global investment strategies. Halkbank, in its long-term business strategies covering a period of 21-30 years, aims to effectively manage the risks and opportunities associated with these criteria, particularly climate change, while providing the necessary financing for the transition to a low-carbon economy. Within this context, the bank diligently oversees environmental and water management in both its direct and indirect activities, adhering to international standards and regulations. One of Halkbank's primary objectives concerning direct water usage is to consistently raise awareness across all branches and annually reduce water withdrawal figures. Regarding indirect water usage, the bank seeks to closely monitor the water-related aspects of the projects it finances and actively explore measures to mitigate climate-related impacts, including water-related challenges. These considerations are crucial given the growing risks associated with water scarcity and drought.
Strategy for achieving long- term objectives	Yes, water-related issues are integrated	21-30	Aligned with its water-related risk assessments covering a period of 21-30 years and evolving regulations, Halkbank has implemented a comprehensive Corporate Water Policy and Sustainable Procurement Policy. As part of its commitments, the bank establishes specific per capita water consumption targets for its direct operations. Furthermore, as a bank committed to enhancing the understanding of climate change and water management among its internal and external stakeholders, Halkbank endeavors to effectively address its water-related risks through comprehensive Environmental and Social Impact Assessments



			integrated into its project credit evaluation modules. The bank places significant emphasis on evaluating the environmental impact of its lending processes and incorporates rigorous criteria to assess water pollution and dependency. Additionally, considering its core mission of supporting Small and Medium-sized Enterprises (SMEs), Halkbank provides its customers with an online training program accessible on the www.halkbankkobigelisim.com.tr platform. This collaborative approach fosters a collective commitment to water stewardship and supports the development of innovative solutions for water-related issues. Ultimately, the program contributes to the broader goal of achieving improved water management practices and mitigating the risks associated with water scarcity and quality degradation.
Financial planning	Yes, water-related issues are integrated	21-30	Water-related risks are comprehensively assessed within the bank, with active participation from all relevant business units. The Sustainability Committee, which includes the Deputy General Manager of the Financial Management and Planning Department, plays a vital role in these evaluations. The financial implications of water and climate-related issues, both in direct operations and throughout the value chain, are consistently taken into account in long-term business planning covering a period of 21-30 years. During quarterly committee meetings, budget adjustments and performance targets are deliberated upon and determined through majority voting to ensure the achievement of these targets. Additionally, the finance department actively participates in decision-making processes regarding the financial aspects and targets associated with water risks. Within the bank's long-term strategy, the objective of reducing per capita water usage is consistently considered in CAPEX planning through the implementation of efficiency measures such as the procurement of sensor faucets and the utilization of water purification dispensers. Furthermore, in risk assessments, the substantive impact is evaluated annually. In the long-term strategy, it is planned to establish a threshold value for all financing groups in order to make the



		assessment system more comprehensive.

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)

12

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

10

Water-related OPEX (+/- % change)

83

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

5

Please explain

The increase in CAPEX is attributed to water-related investments undertaken in 60 branches for renovation purposes, as well as in an additional 14 branches for new openings in 2022. 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 10% increase in CAPEX expenses depending on the number of new branches to be opened next year.

Annual expenditures for water withdrawals, including mains water and drinking water, are considered part of the OPEX. The increase in OPEX is attributed to the rise in unit prices associated with water expenses. Considering the goal of discontinuing the purchase of PET bottles and



enhancing the utilization of purified water, it is anticipated that OPEX expenditures will experience an approximate 5% increase in line with the municipality's unit price escalations.

W7.3

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

	Use of scenario analysis	Comment
Row 1	Yes	N/A

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 Climate- related	Halkbank evaluates water-related risks as part of its operational and credit risk assessment, considering the significant dependence of its external stakeholders, particularly the sectors it finances, on water resources. In conducting these risk assessments, the Bank employs various scenarios based on current trend analyses. For climate-related scenarios, the bank utilizes the RCP 2.6 scenario for a future	According to the Water Efficiency Strategy Document and Action Plan published by the Ministry, the per capita available annual water quantity in Turkey is 1,323 m³ for the year 2021. However, with the increasing population, it is expected that the per capita available annual water quantity will decrease to 1,200 m3 by the year 2030, 1,116 by 2040, and 1,069 m3 by 2050. As the population grows and the per capita available annual water quantity decreases,	Based on the findings of the scenario analysis, Halkbank intends to: 1. Implement measures to reduce water usage: Halkbank plans to adopt practices that will effectively reduce its water usage amounts. This includes implementing watersaving technologies and practices across its operations. In line with this, the bank has set a target to reduce per capita water usage until 2030 and regularly monitors the water



where low-emission energy sources are rapidly adopted, the RCP 4.5 scenario for a moderate transition period, and the RCP 8.5 scenario for a future characterized by high emissions and increased risks. RCP scenarios rely on climate models that simulate how the atmosphere, oceans, land surface, and ice interact. These scenarios also incorporate different trajectories of greenhouse gas emissions, which reflect diverse paths of socio-economic and technological development. These paths are determined by assumptions regarding factors like population growth, economic activities, energy usage, and technological progress.

For water-related scenarios, the Bank considers the outputs of the country's drought assessment and the WRI Aqueduct Tool's optimistic, business-as-usual, and pessimistic scenarios for the years 2030 and 2040.

The WRI Aqueduct Tool assesses waterrelated risks by considering various parameters and assumptions. It analyzes factors such as water availability, demand, and stress, along with climate change scenarios including temperature and precipitation changes. Socioeconomic factors

there will be an increased demand for water resources. This can put pressure on the bank's customers, especially those in waterintensive industries, and may impact their operational efficiency and profitability.

In the year 2022, 85% of the bank's facilities operate in areas with high water stress. According to the future scenarios of the WRI Aqueduct Tool, in the pessimistic, businessas-usual, and optimistic scenarios for the year 2030, this percentage is projected to increase to 88%. By the year 2040, in the pessimistic and BAU scenarios, it is expected to reach 90%, while in the optimistic scenario, it is anticipated to rise to 89%. There is a risk of limited water availability for daily operations and for the bank's customers. This can lead to challenges in maintaining adequate water supply for various purposes, such as agriculture, manufacturing, and energy production.

The decreasing water availability and increasing water stress may result in stricter regulations and policies related to water usage and conservation.

usage of facilities through the IKLIM software to track the progress towards these goals.

- 2. Address risks in the water-intensive sectors: Considering the anticipated decreases in precipitation levels and the impacts of droughts on the hydroelectric, agriculture, and steel sectors, Halkbank recognizes the need for regulation in the credit evaluation methods for these industries. The bank incorporates appropriate criteria related to water resources in its credit evaluation modules, considering the environmental impacts.
- 3. Climate change integration: Halkbank acknowledges the importance of considering climate change in its portfolios. The bank balances its credit distributions by considering the potential risks associated with climate change, including water-related risks. Additionally, the bank is working on different financing packages for its customers operating in sectors with intensive water usage to support their actions in mitigating water risks.

By implementing these strategies, Halkbank



like population growth and economic	aims to effectively respond to water-related
development are also considered.	challenges.
Hydrological processes, including runoff and	
groundwater recharge, are simulated, and	
the tool considers policy and governance	
frameworks. By combining these elements,	
the WRI Aqueduct Tool provides valuable	
insights into water risks and aids in decision-	
making for water management and resource	
allocation.	
By incorporating climate and water-related	
analyses, the Bank conducts risk	
assessments that encompass low, medium,	
and high-impact scenarios.	

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

The Water Efficiency Strategy Document and Action Plan published by the Ministry emphasizes the lack of full cost recovery-based pricing policies supporting sustainable water services and tariff applications that promote efficient water use in all sectors. The goal is to establish the legal framework and implementation mechanisms for pricing water based on full cost recovery in the coming years. Halkbank, despite having



only domestic water usage, is researching various pricing practices, including internal water pricing, to address the possibility of increased OPEX costs in the financial planning process.

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	Definition used to classify low water impact	Please explain
Row 1	Yes	For Halkbank, the term "Low-Water Impact Product" denotes sustainable solutions that operate in fields such as renewable energy or water management, with minimal or non-existent consumption of water resources. These products are designed to minimize the use of water or eliminate it altogether while promoting environmentally responsible practices. Halkbank defines low-water impact financing for renewable energy as an alternative to traditional methods of energy production that consume fewer water resources. Renewable energy sources rely on natural resources such as hydroelectric, solar, wind, and geothermal power. These sources utilize methods of energy production with minimal or zero water consumption. For instance, in hydroelectric power generation, water is solely used to rotate the turbines, while solar energy is harnessed through the conversion of sunlight into electricity by solar panels. These low-water impact solutions offer significant environmental advantages compared to energy production based	In line with its long-term strategic objectives, the bank exercises portfolio management and control over portfolio impact, taking into account the renewable energy projections outlined in Turkey's National Energy Plan. In the year 2022, Halkbank's renewable energy lending portfolio exhibited a distribution wherein Solar Power Plant (SPP) projects accounted for 69%, Hydroelectric Power Plants (HES) represented 17%, and Biomass Energy Systems (BES) comprised 14%.



on fossil fuels. Fossil fuel combustion results in extensive water	
usage and pollution, whereas renewable energy sources provide	
clean and sustainable energy.	

W8. Targets

W8.1

(W8.1) Do you have any water-related targets?

Yes

W8.1a

(W8.1a) Indicate whether you have targets relating to water pollution, water withdrawals, WASH, or other water-related categories.

	Target set in this category	Please explain
Water pollution	Yes	
Water withdrawals	Yes	
Water, Sanitation, and Hygiene (WASH) services	Yes	
Other	No, but we plan to within the next two years	Currently, apart from the aforementioned goals, we do not have any other specific objectives. However, we are focusing on efficiency initiatives and working on different targets through the credit packages we have developed.

W8.1b

(W8.1b) Provide details of your water-related targets and the progress made.



Target reference number

Target 1

Category of target

Water withdrawals

Target coverage

Company-wide (direct operations only)

Quantitative metric

Other, please specify

Reducing per capita water withdrawal

Year target was set

2019

Base year

2018

Base year figure

11.99

Target year

2023

Target year figure

9.59

Reporting year figure

9.33



% of target achieved relative to base year

110.8333333333

Target status in reporting year

Achieved

Please explain

The bank solely utilizes domestic water in its direct operations. Therefore, the total water withdrawal volume includes the usage of both municipal water supply and drinking water. Halkbank, within the scope of its environmental management system, commits to managing efficient water usage in the bank's long-term strategies, the establishment of objectives and action plans, and the processes derived from its activities. In line with these commitments, in 2019, before the occurrence of the pandemic, based on the data from 2018, the bank set a target to achieve a 20% reduction in per capita water withdrawal volume (m3/person), equivalent to 9.59 m3/person, by the year 2023. The per capita water withdrawal in 2018 was 11.99 m3/person. By 2022, this value had decreased to 9.33 m3/person, resulting in a 22% reduction. The actions taken to accomplish this objective include the widespread adoption of efficiency devices such as aerators and sensor-equipped fixtures in tap water, the enhancement of monitoring systems, and the provision of awareness training to employees. Furthermore, in line with the country's strategic action plan for efficiency goals, the bank is currently working on new targets within the framework of its sustainable growth strategy.

Target reference number

Target 2

Category of target

Water pollution

Target coverage

Company-wide (direct operations only)

Quantitative metric

Increase in water use met through recycling/reuse

Year target was set



2022

Base year

2022

Base year figure

0

Target year

2030

Target year figure

15

Reporting year figure

0

% of target achieved relative to base year

n

Target status in reporting year

New

Please explain

The increased use of treated wastewater helps reduce water pollution by protecting natural water sources and promoting more efficient utilization of clean water resources. This contributes to the sustainability of water sources and ensures their availability for future generations. Furthermore, utilizing treated wastewater supports environmental efficiency by reducing the reliance on natural water sources and lowering treatment costs. It is important to note that the bank's activities have no detrimental impact on water quality, as they adhere to strict environmental standards and regulations. However, this not only minimizes environmental impacts but also encourages the efficient use of water. Therefore, the Bank aims to increase the reuse rate of treated wastewater in its facilities to 15% by the year 2030.



Target reference number

Target 3

Category of target

Water, Sanitation and Hygiene (WASH) services

Target coverage

Company-wide (including suppliers)

Quantitative metric

Other, please specify
Increasing WASH Score according to WBCSD Self-Assessment Tool

Year target was set

2022

Base year

2022

Base year figure

87

Target year

2030

Target year figure

95

Reporting year figure

87

% of target achieved relative to base year

O



Target status in reporting year

New

Please explain

Halkbank utilizes the World Business Council for Sustainable Development's (WBSCD) Self-Assessment Tool for Evaluating Access to Water, Sanitation, and Hygiene (WASH) to assess its own performance. According to this tool, Halkbank achieved a business score of 87% in 2022. The bank is committed to ensuring employees' access to clean water and providing a healthy working environment. Therefore, it aims to enhance its business score to 95% by 2030 by implementing suitable enhancements.

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

Halkbank ISO 14046 Assessment Report-2022_EN_Rev.01.pdf

W9.1a

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

	isclosure odule	Data verified	Verification standard	Please explain
W	'1 Current	Amount of total water withdrawal volume, total water	Other, please	All data shared in Current State has been verified by
st	ate	discharge volume, and total water consumption volume	specify	third parties to the ISO 14046:2016 standard.
			ISO 14046	



W10. Plastics

W10.1

(W10.1) Have you mapped where in your value chain plastics are used and/or produced?

	Plastics mapping	Value chain stage	Please explain
Row 1	Yes	Supply chain	The bank has given priority to the mapping of its products and, within this framework, has assessed the cards obtained during the reporting year. These cards are composed of PVC, PE, metal, and toner. PVC is widely used in card production due to its durability, flexibility, and cost-effectiveness, making up 95% of the card's composition. In 2022, the bank procured a total of 521,088 cards, each weighing 5.17 grams. The card's composition includes 4.92 grams of plastic, 0.15 grams of metal, and 0.1 grams of toner. Consequently, the total weight of plastic used in these cards amounts to 2.56 tons.

W10.2

(W10.2) Across your value chain, have you assessed the potential environmental and human health impacts of your use and/or production of plastics?

	Impact assessment	Value chain stage	Please explain
Row 1	Yes	chain	In Halkbank's supply chain, the product with the highest plastic usage is the cards, particularly credit cards. The composition of a credit card predominantly consists of 95% PVC (Polyvinyl Chloride). PVC is a commonly used material in the production of cards due to its durability, flexibility, and cost-effectiveness. However, it is important to note that PVC has significant environmental concerns associated with its production, use, and disposal. PVC, a commonly used synthetic plastic material, has significant environmental impacts throughout its lifecycle. Its



	production process involves the use of fossil fuels, leading to greenhouse gas emissions and the depletion of finite
	resources. Additionally, PVC is non-biodegradable and can release toxic substances when disposed of, posing risks to
	the environment and human health. Incineration of PVC further contributes to air pollution and the release of hazardous
	pollutants.

W10.3

(W10.3) Across your value chain, are you exposed to plastics-related risks with the potential to have a substantive financial or strategic impact on your business? If so, provide details.

	Risk exposure	Please explain
Row	Not assessed – but we	The utilization of only 2.56 tons of plastic in all the cards produced by the bank within a year is considered a small amount.
1	plan to within the next	Therefore, it is deemed to pose no significant strategic risk for the bank. However, the bank is aware that even small
	two years	quantities hold importance in reducing the environmental impact of plastic usage. Consequently, the bank is actively
		engaged in initiatives aimed at minimizing plastic usage, exploring alternative materials such as recyclable or biodegradable
		materials. This signifies the bank's commitment to reducing the environmental effects associated with plastic usage while
		recognizing the significance of every effort made in this regard.

W10.4

(W10.4) Do you have plastics-related targets, and if so what type?

	Targets	Target type	Target metric	Please explain
	in place			
Row	Yes	Plastic	Other, please	PET bottles have a significant adverse impact on the environment due to their slow decomposition rate,
1		packaging	specify	which can extend over hundreds of years. These bottles exacerbate the escalating issue of plastic
			Reducing the use	pollution, posing substantial risks to marine life, ecosystems, and human well-being. In line with the
				bank's commitment to environmental stewardship, it has established a target to reduce the
			bottles	procurement of PET bottles for drinking water in its direct operations by 10% by 2025, relative to the
				baseline year of 2021. This target signifies the bank's recognition of the polluting effects of plastics and



		underscores its dedication to mitigating such impacts. By actively striving to diminish PET bottle usage,
		the bank aims to contribute to the reduction of plastic waste and promote sustainable practices. This
		initiative aligns with the bank's broader sustainability commitments, underscoring its steadfast
		commitment to minimizing its environmental footprint. To achieve this target, the bank is actively
		promoting the installation of purified water dispensers at the corporate level.

W10.5

(W10.5) Indicate whether your organization engages in the following activities.

	Activity applies	Comment
Production of plastic polymers	No	N/A
Production of durable plastic components	No	N/A
Production / commercialization of durable plastic goods (including mixed materials)	Yes	N/A
Production / commercialization of plastic packaging	No	N/A
Production of goods packaged in plastics	No	N/A
Provision / commercialization of services or goods that use plastic packaging (e.g., retail and food services)	No	N/A

W10.7

(W10.7) Provide the total weight of plastic durable goods/components sold and indicate the raw material content.

Row 1

Total weight of plastic durable goods/components sold during the reporting year (Metric tonnes)

2.56

Raw material content percentages available to report

% virgin fossil-based content



% virgin fossil-based content

100

Please explain

The bank's plastic durable goods consist solely of credit and debit cards. In 2022, the bank acquired 521,088 cards. The weight of each card is a total of 5.17 grams. The card content consists of 4.92 grams of plastic, 0.15 grams of metal, and 0.1 grams of toner.

The total weight of plastic sold is calculated using the following formula: Number of cards sold multiplied by the total weight of plastic used in each card.

The plastic content is entirely derived from fossil sources and includes the use of PVC and PE coatings. No recycled materials were used in the cards in 2022.

W11. 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 can access all the documents mentioned in this report from the attachment.

WATER POLICY.pdf

U SUSTAINABLE PROCUREMENT POLICY.pdf

Halkbank ISO 14046 Assessment Report-2022_EN_Rev.01.pdf

0 2022-integrated-annual-report.pdf

W11.1

(W11.1) 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

Submit your response

In which language are you submitting your response?

English

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	Yes	Public

Please indicate your consent for CDP to share contact details with the Pacific Institute to support content for its Water Action Hub website.

No

Please confirm below

I have read and accept the applicable Terms