

(Convenience Translation of Financial Statements and Related
Disclosures and Footnotes Originally Issued in Turkish)

ING Bank A.Ş.

Publicly Announced Unconsolidated Financial Statements,
Related Disclosures and Independent
Auditors' Report
as of and for the Year Ended
31 December 2024

11 February 2025

*This report consists of 4 pages of "Independent Auditors' Report"
and 112 pages of unconsolidated financial statements and
related disclosures and footnotes.*

Convenience Translation of the Independent Auditors' Report Originally Issued in Turkish

INDEPENDENT AUDITOR'S REPORT

To the Shareholders of ING Bank Anonim Şirketi:

Audit of Unconsolidated Financial Statements

Opinion

We have audited the accompanying unconsolidated financial statements of ING Bank A.Ş. ("the Bank"), which comprise the unconsolidated statement of balance sheet as at December 31, 2024, and the unconsolidated statement of income, unconsolidated statement of profit or loss and other comprehensive income, unconsolidated statement of changes in shareholders' equity and unconsolidated statement of cash flows for the year then ended and notes to the unconsolidated financial statements, and a summary of significant accounting policies and other explanatory information.

In our opinion, the accompanying unconsolidated financial statements present fairly, in all material respects, the unconsolidated financial position of ING Bank A.Ş. as at December 31, 2024 and financial performance and unconsolidated cash flows for the year then ended in accordance with the prevailing accounting principles and standards set out as in accordance with "Regulation on Accounting Applications for Banks and Safeguarding of Documents" published in the Official Gazette no.26333 dated 1 November 2006 and other regulations on accounting records of Banks published by Banking Regulation and Supervision Agency (BRSA), circulars, interpretations published by BRSA and "BRSA Accounting and Financial Reporting Legislation" which includes the provisions of Turkish Financial Reporting Standards (TFRS) for the matters which are not regulated by these regulations.

Basis for Opinion

Our audit was conducted in accordance with "Regulation on independent audit of the Banks" published in the Official Gazette no.29314 dated 2 April 2015 by BRSA (BRSA Independent Audit Regulation) and Independent Auditing Standards ("ISA") which are the part of Turkish Auditing Standards issued by the Public Oversight Accounting and Auditing Standards Authority ("POA"). Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are independent of the Bank in accordance with of Code of Ethics for Independent Auditors (Code of Ethics) published by POA and have fulfilled our other responsibilities in accordance with the code of ethics. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Key Audit Matters

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

Key Audit Matter	How the Key Audit Matter is addressed in our audit
<i>TFRS 9 “Financial Instruments” Standard and recognition of impairment on financial assets and related significant disclosures</i>	
<p>As presented in Section III footnote VIII, the Bank recognizes expected credit losses of financial assets in accordance with TFRS 9 Financial Instruments standard. We considered impairment of financial assets as a key audit matter since:</p> <ul style="list-style-type: none"> - Amount of on and off-balance sheet items that are subject to expected credit loss calculation is material to the financial statements. - There are complex and comprehensive requirements of TFRS 9. - The classification of the financial assets is based on the Bank’s business model and characteristics of the contractual cash flows in accordance with TFRS 9 and the Bank uses significant judgment on the assessment of the business model and identification of the complex contractual cash flow characteristics of financial instruments. - Policies implemented by the Bank management include compliance risk to the regulations and other practices. - Processes of TFRS 9 are advanced and complex. - Judgements and estimates used in expected credit loss, complex and comprehensive. - Disclosure requirements of TFRS 9 are comprehensive and complex. 	<p>Our audit procedures included among others include:</p> <ul style="list-style-type: none"> - Evaluating the appropriateness of accounting policies as to the requirements of TFRS 9, Bank’s past experience, local and global practices. - Reviewing and testing of processes which are used to calculate expected credit losses by involving our Information technology and process audit specialists. - Reviewing the appropriateness of criteria in order to identify the financial assets having solely payments of principal and interest and checking the compliance to the Bank’s Business model. - Evaluating the alignment of the significant increase in credit risk determined during the calculation of expected credit losses, default definition, restructuring definition, probability of default, loss given default, exposure at default and macro-economic variables that are determined by the financial risk management experts with the Bank’s past performance, regulations, and other processes that has forward looking estimations. - Assessing the completeness and the accuracy of the data used for expected credit loss calculation. - Testing the mathematical accuracy of expected credit loss calculation on sample basis. - Evaluating the judgments and estimates used for the individually assessed financial assets. - Evaluating the accuracy and the necessity of post-model adjustments. - Auditing of TFRS 9 disclosures.

Responsibilities of Management and Directors for the Unconsolidated Financial Statements

Bank management is responsible for the preparation and fair presentation of the unconsolidated financial statements in accordance with the BRSA Accounting and Reporting Legislation and for such internal control as management determines is necessary to enable the preparation of the financial statement that is free from material misstatement, whether due to fraud or error.

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

Those charged with governance are responsible for overseeing the Bank’s financial reporting process.

Auditor's Responsibilities for the Audit of the Unconsolidated Financial Statements

In an independent audit, the responsibilities of us as independent auditors are:

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

As part of an audit in accordance with BRSA Independent Audit Regulation and ISAs, we exercise professional judgement and maintain professional scepticism throughout the audit. We also:

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

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

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

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

Report on Other Legal and Regulatory Requirements

- 1) In accordance with Article 402 paragraph 4 of the Turkish Commercial Code ("TCC") no 6102; no significant matter has come to our attention that causes us to believe that the Bank's bookkeeping activities and financial statements for the period January 1 – December 31, 2024 are not in compliance with the TCC and provisions of the Bank's articles of association in relation to financial reporting.
- 2) In accordance with Article 402 paragraph 4 of the TCC; the Board of Directors submitted to us the necessary explanations and provided required documents within the context of audit.

The engagement partner who supervised and concluded this independent auditor's report is Fatma Ebru Yücel.

Güney Bağımsız Denetim ve Serbest Muhasebeci Mali Müşavirlik Anonim Şirketi
A member firm of Ernst & Young Global Limited

Fatma Ebru Yücel, SMMM
Partner

February 11, 2025
Istanbul, Turkey

The unconsolidated financial report of ING Bank A.Ş. prepared as of and for the year ended 31 December 2024

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The unconsolidated year end financial report includes the following sections in accordance with the "Communiqué on the Financial Statements and Related Disclosures and Footnotes that will be Publicly Announced" as regulated by the Banking Regulation and Supervision Agency.

- General information about the Bank
- Unconsolidated financial statements of the Bank
- Explanations on accounting policies applied in the related period
- Information on financial structure and risk management of the Bank
- Explanations and notes related to unconsolidated financial statements
- Other explanations
- Independent Auditors' report

The accompanying year end unconsolidated financial statements and footnotes to these financial statements which are expressed, unless otherwise stated, in **thousands of Turkish Lira (TL)**, have been prepared based on the accounting books of the Bank in accordance with the Regulation on Accounting Applications for Banks and Safeguarding of Documents, Turkish Accounting Standards, Turkish Financial Reporting Standards, relating appendices and interpretations on these, and are independently audited.

John T. Mc CARTHY
Chairman of the Board

Alper İhsan GÖKGÖZ
CEO

K. Atıl ÖZUS
CFO

M. Gökçe ÇAKIT
Financial Reporting
and Tax Director

M. Semra KURAN
Chairman of the Audit
Committee

M. Aşkın DOLAŞTIR
Audit Committee Member

Contact information of the personnel in charge of addressing questions regarding this financial report:

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ING Bank A.Ş.

Notes to the unconsolidated financial statements

as of and for the year ended 31 December 2024

(Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

Section one

General information

I. History of the Bank including its incorporation date, initial legal status, amendments to legal status

The foundations of ING Bank A.Ş. ("The Bank") were laid in 1984 by the establishment of "The First National Bank of Boston Istanbul Branch" and the current structure has been formed with the below mergers and takeovers. The establishment and historical developments of the Bank are explained below:

"The First National Bank of Boston Istanbul Branch" was established in 1984. In 1990, "The First National Bank of Boston A.Ş." was established to accept deposits and carry out banking transactions, and the "Articles of Association" of the Bank were officially registered on 31 October 1990 and published in the Turkish Trade Registry Gazette on 5 November 1990. Upon the establishment of the Bank and permission to accept deposits, the assets and liabilities in the balance sheet of "The First National Bank of Boston Istanbul Branch" were transferred to the Bank.

The title of the Bank which was operating as a Turkish Bank with four shareholders including Ordu Yardımlaşma Kurumu ("OYAK"), was changed as "Türk Boston Bank A.Ş." in 1991; and OYAK purchased all other shares and became the sole owner of the Bank in 1993. On 10 May 1996, the title of "Türk Boston Bank A.Ş." was changed as "Oyak Bank A.Ş.".

On the other hand, on 22 December 1999, upon a Council of Ministers Decree, the shareholding rights, management and supervision of Sümerbank A.Ş. except for its dividend rights were transferred to Savings Deposit Insurance Fund ("the SDIF") as per the 3. and 4. paragraphs of Article 14 of the Banking Law. In 2001, the SDIF decided to merge the assets and liabilities of the banks, namely Egebank A.Ş., Türkiye Tütüncüler Bankası Yaşarbank A.Ş., Yurt Ticaret ve Kredi Bankası A.Ş., Bank Kapital A.Ş. and Ulusal Bank T.A.Ş. that have been formerly transferred to the SDIF, into Sümerbank A.Ş.

According to a share sale agreement executed between the SDIF and OYAK on 9 August 2001, all the shares constituting the capital of Sümerbank A.Ş. whose shares were transferred to the SDIF; were transferred to OYAK by the SDIF. As of 11 January 2002, it was resolved that Sümerbank A.Ş. would settle all its accounts and merge with the Bank and continue its banking operations under the Bank. The merger through transfer was performed on 11 January 2002 upon the approval of the Banking Regulation and Supervision Agency ("BRSA").

In accordance with the permissions of the Competition Board with the decree number 07-69/856-324 dated 6 September 2007 and of the BRSA with the decree number 2416 dated 12 December 2007; the transfer of 1,074,098,150 shares of the Bank that represent the total capital which belongs to OYAK in amount of TL 1,074,098 to ING Bank N.V as of 24 December 2007 has been approved by the Board of Directors decision numbered 55/1 and dated 24 December 2007 and the share transfer has been recorded in Shareholders Stock Register as of the same date. It has been decided to change the title of the Bank from "Oyak Bank A.Ş." to "ING Bank A.Ş." effective from 7 July 2008. The Articles of Association of the Bank has been changed with the Extraordinary General Meeting dated 26 June 2014 in accordance with Turkish Trade Art numbered 6102 and published in Turkish Trade Registry Gazette numbered 8608 and dated 9 July 2014.

(Convenience translation of the unconsolidated financial statements and related disclosures originally issued in Turkish)

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Notes to the unconsolidated financial statements

as of and for the year ended 31 December 2024

(Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

II. The Bank's shareholder structure, management and internal audit, direct and indirect shareholders, change in shareholder structure during the year and information on bank's risk group

The main shareholders and capital structure as of 31 December 2024 and 31 December 2023 are as follows:

	Current period		Prior period	
	Share amount Full TL	Share percentage	Share amount Full TL	Share percentage
ING Bank N.V.	3,486,267,793	100.00	3,486,267,793	100.00
Other shareholders total	4	-	4	-
Total	3,486,267,797	100.00	3,486,267,797	100.00

As of 31 December 2024, the Bank's paid-in capital consists of 3,486,267,797 shares with a nominal value of TL 1 (Full TL) each.

The Bank's paid-in capital is TL 3,486,268 as of 31 December 2024 and ING Bank N.V. has full control over the Bank's capital.

Other shareholders total represent the total shares of Chairman of the Board John T. Mc Carthy, Vice Chairman of the BoD A. Canan Ediboğlu, the members of the Board M. Semra Kuran and Karst Jan Wolters with a nominal value of TL 1 (Full TL) each.

One share amounting to TL 1 (full TL), belonging to the Member of the Board of Directors, Nermin Güney, was transferred to M. Semra Kuran on 1 April 2024.

As one of the world's leading financial services institutions, ING Group operates in the retail banking, wholesale and mid-corporate banking, investment banking and portfolio management segments. ING Group was established in 1991 as a result of a merger between NMB Postbank, which has a distinguished 150-year history, and the Netherlands' leading insurance company, Nationale-Nederlanden. Both companies were providing services in international markets before the merger, but ING became a leading global financial service provider with the merger.

ING Bank A.Ş.

Notes to the unconsolidated financial statements

as of and for the year ended 31 December 2024

(Amounts expressed in thousands of Turkish Lira (“TL”) unless otherwise stated.)

III. Information on the Bank’s board of directors chairman and members, audit committee members, chief executive officer, executive vice presidents and their responsibilities and shareholdings in the Bank

As of 31 December 2024, the Bank’s Board of Directors (BOD), Members of Audit Committee and Chief Executive Officer and Executive Vice Presidents are as follows:

Name and Surname	Title	Responsibility area
John T. Mc Carthy	Chairman of the BoD	Legally declared
A. Canan Ediboğlu	Vice Chairman of the BoD	Legally declared
M. Semra Kuran	BoD Member and Chairman of the Audit Committee	Legally declared
M. Aşkın Dolacı	BoD Member and Audit Committee Member	Legally declared
Karst Jan Wolters	BoD Member	Legally declared
Alper İhsan Gökgöz	Chief Executive Officer and BoD Member	Legally declared
Ayşegül Akay	Executive Vice President	Corporate Banking
Cankut Öztürk	Chief Audit Executive	Internal Audit
Hale Ökmen Ataklı	Executive Vice President	Human Resources
Hüsnüye Ulu	Executive Vice President	Operation
İlker Kayseri	Executive Vice President	Treasury
İpek Erhan	Executive Vice President	Corporate Customers
K. Atıl Özus	Chief Financial Officer	Financial Control and Treasury
Kamil Stefanski	Executive Vice President	Financial Markets
Nermin Güney	Executive Vice President	Credits
Okan Korkmaz	Executive Vice President	Financial Risk Management
Öcal Açar	Executive Vice President	Business Banking
Özge Gürsoy	Executive Vice President	Compliance Risk Management and Internal Control
Sedef Kılavuz Balcı	Executive Vice President	Legal
Tuğçe Bora Kılıç	Executive Vice President	Retail Banking
Umut Pasin	Executive Vice President	Retail and Corporate Credits

Chief Executive Officer and Executive Vice Presidents have no share in the Bank.

Operation Executive Vice President Tuğçe Bora Kılıç, has been appointed to Executive Vice President of Retail Banking per the Board of Directors resolution No. 37/1 and dated 16 April 2024, starting from 1 May 2024, and has been continued as the Deputy Chairman of the Operation.

The Bank’s Credits Executive Vice President Martijn Bastiaan Kamps has resigned from his duty effective as from 31 May 2024, and took responsibility in the ING Group Credits unit. With the Board of Directors resolution, no. 55-4, dated 6 June 2024, Nermin Güney has been appointed as a Credits Executive Vice President.

With the Board of Directors resolution, no. 55-4, dated 6 June 2024, Aşkın Dolacı has been appointed as a member of the Board of Directors and has been decided to elected member of the Audit Committee to be effective as from 6 June 2024; substituting Nermin Güney; who resigned from her duty as a member of the Board of Directors and member of the Audit Committee.

The Bank’s Technology Executive Vice President Wouter Meijs has resigned from his duty effective as from 30 June 2024, and took responsibility in the ING Group Global IT unit, and as per the Board of Directors’ resolution, no. 57-1, dated 28 June 2024, Alper Gökgöz acting as the Deputy Chairman of Technology.

Risk and Financial Audit Executive Vice President and acting Deputy Chief Audit Executive Cankut Öztürk, has been appointed as the Chief Audit Executive effective as of 1 October 2024.

The Office of the Executive Vice President for Compliance Risk Management has been changed to “The Office of the Executive Vice President for Compliance Risk Management and Internal Control” merging the Compliance and Internal Control teams under a single roof. With the Board of Directors resolution, no. 102-1, dated 4 December 2024, Özge Gürsoy has been appointed as a Compliance Risk Management and Internal Control Executive Vice President.

Hüsnüye Ulu, who serves as General Manager at ING Finansal Kiralama A.Ş., with the Board of Directors resolution, no. 103-2, dated 10 December 2024, has been appointed as a Operation Executive Vice President as of December 19, 2024.

(Convenience translation of the unconsolidated financial statements and related disclosures originally issued in Turkish)

ING Bank A.Ş.

**Notes to the unconsolidated financial statements
as of and for the year ended 31 December 2024
(Amounts expressed in thousands of Turkish Lira (“TL”) unless otherwise stated.)**

IV. Information on the Bank’s qualified shareholders

ING Bank N.V. has full control over the Bank’s management with 3,486,267,793 shares and 100% paid-in share.

V. Summary information on the Bank’s activities and services

The Bank is principally engaged in all types of banking transactions, accepting deposits and all kinds of legal transactions, activities and operations within banking license within the scope provided by the Banking Law, and all existing and/or future laws, regulations and decree laws and related legislation. The Bank carries out its operations with 59 domestic branches.

VI. Differences between the Communiqué on Preparation of Financial Statements of Banks and Turkish Accounting Standards and Short Explanation about the Entities Subject to Full Consolidation or Proportional Consolidation and Entities which are Deducted from Equity or Entities which are not Included in these Three Methods

There is no difference for the Bank, except for the non-financial subsidiary, between the consolidation process according to the Turkish Accounting Standards and the Communiqué of the Preparation of Financial Statements of Banks in Turkey.

ING Teknoloji A.Ş., a non-financial subsidiary owned 100% and by the Bank, was registered in the Trade Registry Gazette on 7 March 2023. The Bank presents ING Teknoloji A.Ş. in the non-consolidated non-financial subsidiaries line in its financial statements as it is non-financial institution, and has not been consolidated within the scope of the Communiqué of the Preparation of Consolidated Financial Statements of Banks.

VII. Current or likely actual or legal barriers to immediate transfer of equity or repayment of debts between the Bank and its subsidiaries

None.

Section two

Unconsolidated financial statements

- I. Unconsolidated balance sheet (statement of financial position)
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- III. Unconsolidated statement of profit or loss
- IV. Unconsolidated statement of profit or loss and other comprehensive income
- V. Unconsolidated statement of changes in equity
- VI. Unconsolidated statement of cash flows
- VII. Statement of profit distribution

(Convenience translation of the unconsolidated financial statements and related disclosures originally issued in Turkish)

ING Bank A.Ş.

Unconsolidated balance sheet (statement of financial position)

as of 31 December 2024

(Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

		Audited			Audited		
		Current period			Prior period		
		(31/12/2024)			(31/12/2023)		
Assets	Note	TL	FC	Total	TL	FC	Total
	(section five)						
I. Financial assets (net)		48,025,309	23,038,904	71,064,213	20,804,151	22,162,033	42,966,184
1.1 Cash and cash equivalents		40,508,930	20,841,554	61,350,484	16,110,953	20,749,859	36,860,812
1.1.1 Cash and balances at Central Bank	(I-1)	20,238,942	19,105,183	39,344,125	7,609,515	19,347,863	26,957,378
1.1.2 Banks	(I-3)	7,692	1,738,729	1,746,421	982	1,404,392	1,405,374
1.1.3 Money market placements		20,273,676	-	20,273,676	8,508,257	-	8,508,257
1.1.4 Expected credit losses (-)	(I-5)	(11,380)	(2,358)	(13,738)	(7,801)	(2,396)	(10,197)
1.2 Financial assets at fair value through profit or loss	(I-2)	890,669	897,002	1,787,671	12,465	429,638	442,103
1.2.1 Government securities		890,095	897,002	1,787,097	12,154	429,638	441,792
1.2.2 Equity instruments		574	-	574	311	-	311
1.2.3 Other financial assets		-	-	-	-	-	-
1.3 Financial assets at fair value through other comprehensive income	(I-4)	5,337,778	2,842	5,340,620	3,812,200	1,863	3,814,063
1.3.1 Government securities		5,226,106	-	5,226,106	3,747,434	-	3,747,434
1.3.2 Equity instruments		111,672	2,842	114,514	64,766	1,863	66,629
1.3.3 Other financial assets		-	-	-	-	-	-
1.4 Derivative financial assets		1,287,932	1,297,506	2,585,438	868,533	980,673	1,849,206
1.4.1 Derivative financial assets measured at fair value through profit or loss	(I-2)	1,098,008	1,297,506	2,395,514	827,566	980,673	1,808,239
1.4.2 Derivative financial assets measured at fair value through other comprehensive income	(I-11)	189,924	-	189,924	40,967	-	40,967
II. Financial assets measured at amortised cost		67,016,834	28,070,038	95,086,872	58,790,465	25,611,231	84,401,696
2.1 Loans	(I-5)	55,454,031	28,208,526	83,662,557	49,884,145	25,962,932	75,847,077
2.2 Receivables from leasing transactions	(I-10)	-	-	-	-	-	-
2.3 Factoring receivables		-	-	-	-	-	-
2.4 Other financial assets measured at amortised cost	(I-6)	12,681,010	-	12,681,010	9,970,600	-	9,970,600
2.4.1 Government securities		12,681,010	-	12,681,010	9,970,600	-	9,970,600
2.4.2 Other financial assets		-	-	-	-	-	-
2.5 Expected credit losses (-)	(I-5)	(1,118,207)	(138,488)	(1,256,695)	(1,064,280)	(351,701)	(1,415,981)
III. Assets held for sale and assets of discontinued operations (net)	(I-16)	33,368	-	33,368	-	-	-
3.1 Assets held for sale		33,368	-	33,368	-	-	-
3.2 Assets from discontinued operations		-	-	-	-	-	-
IV. Equity investments		1,088,212	1,703,299	2,791,511	947,201	1,234,860	2,182,061
4.1 Investments in associates (net)	(I-7)	-	-	-	-	-	-
4.1.1 Associates consolidated by using equity method		-	-	-	-	-	-
4.1.2 Unconsolidated associates		-	-	-	-	-	-
4.2 Investments in subsidiaries (net)	(I-8)	1,088,212	1,703,299	2,791,511	947,201	1,234,860	2,182,061
4.2.1 Unconsolidated financial subsidiaries		1,078,212	1,703,299	2,781,511	765,819	1,234,860	2,000,679
4.2.2 Unconsolidated non-financial subsidiaries		10,000	-	10,000	181,382	-	181,382
4.3 Jointly Controlled Partnerships (Joint Ventures) (net)	(I-9)	-	-	-	-	-	-
4.3.1 Joint ventures consolidated by using equity method		-	-	-	-	-	-
4.3.2 Unconsolidated joint ventures		-	-	-	-	-	-
V. Tangible assets (net)	(I-12)	3,332,897	-	3,332,897	758,536	-	758,536
VI. Intangible assets (net)	(I-13)	2,329,478	-	2,329,478	1,043,982	-	1,043,982
6.1 Goodwill		-	-	-	-	-	-
6.2 Other		2,329,478	-	2,329,478	1,043,982	-	1,043,982
VII. Investment property (net)	(I-14)	-	-	-	2,729	-	2,729
VIII. Current tax asset	(I-15)	-	-	-	262,694	-	262,694
IX. Deferred tax asset	(I-15)	1,740,980	-	1,740,980	2,058,754	-	2,058,754
X. Other assets (net)	(I-17)	3,193,849	13,633	3,207,482	6,821,266	22,343	6,843,609
Total assets		126,760,927	52,825,874	179,586,801	91,489,778	49,030,467	140,520,245

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

(Convenience translation of the unconsolidated financial statements and related disclosures originally issued in Turkish)

ING Bank A.Ş.

Unconsolidated balance sheet (statement of financial position)

as of 31 December 2024

(Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

Liabilities	Note (section five)	Audited Current period (31/12/2024)			Audited Prior period (31/12/2023)		
		TL	FC	Total	TL	FC	Total
I. Deposits	(II-1)	95,337,573	35,764,154	131,101,727	69,124,080	31,224,296	100,348,376
II. Loans received	(II-3)	4,103	11,313,927	11,318,030	9,316	13,726,348	13,735,664
III. Money market funds		104,225	714,647	818,872	16,142	167,636	183,778
IV. Securities Issued (net)	(II-4)	-	-	-	-	-	-
4.1 Bills		-	-	-	-	-	-
4.2 Asset backed securities		-	-	-	-	-	-
4.3 Bonds		-	-	-	-	-	-
V. Funds		-	-	-	-	-	-
5.1 Borrower funds		-	-	-	-	-	-
5.2 Other		-	-	-	-	-	-
VI. Financial liabilities at fair value through profit or loss		-	-	-	-	-	-
VII. Derivative financial liabilities		1,823,250	3,039,183	4,862,433	1,461,157	758,706	2,219,863
7.1 Derivative financial liabilities at fair value through profit or loss	(II-2)	1,814,005	3,039,183	4,853,188	1,461,157	758,706	2,219,863
7.2 Derivative financial liabilities at fair value through other comprehensive income	(II-7)	9,245	-	9,245	-	-	-
VIII. Factoring payables		-	-	-	-	-	-
IX. Lease payables (net)	(II-6)	136,360	-	136,360	212,310	-	212,310
X. Provisions	(II-8)	957,976	461,684	1,419,660	581,770	345,525	927,295
10.1 Provision for restructuring		-	-	-	-	-	-
10.2 Reserves for employee benefits		273,994	-	273,994	215,110	-	215,110
10.3 Insurance technical reserves (net)		-	-	-	-	-	-
10.4 Other provisions		683,982	461,684	1,145,666	366,660	345,525	712,185
XI. Current tax liability	(II-9)	1,095,840	-	1,095,840	257,919	-	257,919
XII. Deferred tax liability	(II-9)	-	-	-	-	-	-
XIII. Liabilities for assets held for sale and assets of discontinued operations (net)	(II-10)	-	-	-	-	-	-
13.1 Held for sale		-	-	-	-	-	-
13.2 Related to discontinued operations		-	-	-	-	-	-
XIV. Subordinated debt	(II-11)	-	5,128,095	5,128,095	-	-	-
14.1 Loans		-	-	-	-	-	-
14.2 Other debt instruments		-	5,128,095	5,128,095	-	-	-
XV. Other liabilities	(II-5)	2,942,451	732,125	3,674,576	6,400,729	1,366,253	7,766,982
XVI. Shareholders' equity	(II-12)	20,031,208	-	20,031,208	14,868,058	-	14,868,058
16.1 Paid-in capital		3,486,268	-	3,486,268	3,486,268	-	3,486,268
16.2 Capital reserves		-	-	-	-	-	-
16.2.1 Share premiums		-	-	-	-	-	-
16.2.2 Share cancellation profits		-	-	-	-	-	-
16.2.3 Other capital reserves		-	-	-	-	-	-
16.3 Other comprehensive income/expense items not to be recycled to profit or loss		2,201,139	-	2,201,139	(43,091)	-	(43,091)
16.4 Other comprehensive income/expense items to be recycled in profit or loss		741,572	-	741,572	232,101	-	232,101
16.5 Profit reserves		11,367,094	-	11,367,094	9,494,742	-	9,494,742
16.5.1 Legal reserves		648,464	-	648,464	563,562	-	563,562
16.5.2 Statutory reserves		-	-	-	-	-	-
16.5.3 Extraordinary reserves		10,718,630	-	10,718,630	8,931,180	-	8,931,180
16.5.4 Other profit reserves		-	-	-	-	-	-
16.6 Profit or (loss)		2,235,135	-	2,235,135	1,698,038	-	1,698,038
16.6.1 Prior years' profits or (loss)		-	-	-	-	-	-
16.6.2 Current period profit or (loss)		2,235,135	-	2,235,135	1,698,038	-	1,698,038
Total liabilities and shareholders' equity		122,432,986	57,153,815	179,586,801	92,931,481	47,588,764	140,520,245

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

(Convenience translation of the unconsolidated financial statements and related disclosures originally issued in Turkish)

ING Bank A.Ş.

Unconsolidated statement of off-balance sheet items

as of 31 December 2024

(Amounts expressed in thousands of Turkish Lira (“TL”) unless otherwise stated.)

Off-balance sheet items	Note (section five)	Audited Current period (31/12/2024)			Audited Prior period (31/12/2023)		
		TL	FC	Total	TL	FC	Total
A. Off-balance sheet commitments (I+II+III)		282,655,929	223,686,925	506,342,854	159,360,463	225,636,014	384,996,477
I. Guarantees and warranties	(III-1)	8,312,897	23,887,534	32,200,431	3,604,761	16,994,938	20,599,699
1.1 Letters of guarantee		3,919,927	10,115,794	14,035,721	3,593,133	9,395,369	12,988,502
1.1.1 Guarantees subject to state tender law		2,865	-	2,865	2,797	-	2,797
1.1.2 Guarantees given for foreign trade operations		-	-	-	-	-	-
1.1.3 Other letters of guarantee		3,917,062	10,115,794	14,032,856	3,590,336	9,395,369	12,985,705
1.2 Bank acceptances		-	226,116	226,116	-	4,808	4,808
1.2.1 Import letter of acceptance		-	226,116	226,116	-	4,808	4,808
1.2.2 Other bank acceptances		-	-	-	-	-	-
1.3 Letters of credit		3,387,970	2,756,804	6,144,774	-	2,118,931	2,118,931
1.3.1 Documentary letters of credit		3,387,970	2,756,804	6,144,774	-	2,118,931	2,118,931
1.3.2 Other letters of credit		-	-	-	-	-	-
1.4 Pre-financing given as guarantee		-	-	-	-	-	-
1.5 Endorsements		-	-	-	-	-	-
1.5.1 Endorsements to the Central Bank of Turkey		-	-	-	-	-	-
1.5.2 Other endorsements		-	-	-	-	-	-
1.6 Purchase guarantees for securities issued		-	-	-	-	-	-
1.7 Factoring guarantees		-	-	-	-	-	-
1.8 Other guarantees		1,005,000	10,783,869	11,788,869	-	5,471,693	5,471,693
1.9 Other warranties		-	4,951	4,951	11,628	4,137	15,765
II. Commitments	(III-1)	14,013,415	2,370,772	16,384,187	8,716,129	12,691,234	21,407,363
2.1 Irrevocable commitments		14,013,415	2,370,772	16,384,187	8,716,129	12,691,234	21,407,363
2.1.1 Forward asset purchase commitments		478,425	2,358,753	2,837,178	3,491,031	12,681,042	16,172,073
2.1.2 Forward deposit purchase and sales commitments		-	-	-	36,000	-	36,000
2.1.3 Share capital commitments to associates and subsidiaries		-	-	-	-	-	-
2.1.4 Loan granting commitments		10,656,338	-	10,656,338	3,324,152	-	3,324,152
2.1.5 Securities underwriting commitments		-	-	-	-	-	-
2.1.6 Commitments for reserve requirements		-	-	-	-	-	-
2.1.7 Commitments for cheque payments		310,617	-	310,617	243,467	-	243,467
2.1.8 Tax and fund liabilities from export commitments		23,780	-	23,780	23,780	-	23,780
2.1.9 Commitments for credit card limits		2,520,362	-	2,520,362	1,577,760	-	1,577,760
2.1.10 Commitments for credit cards and banking services promotions		23,893	-	23,893	19,939	-	19,939
2.1.11 Receivables from short sale commitments of marketable securities		-	-	-	-	-	-
2.1.12 Payables for short sale commitments of marketable securities		-	-	-	-	-	-
2.1.13 Other irrevocable commitments		-	12,019	12,019	-	10,192	10,192
2.2 Revocable commitments		-	-	-	-	-	-
2.2.1 Revocable loan granting commitments		-	-	-	-	-	-
2.2.2 Other revocable commitments		-	-	-	-	-	-
III. Derivative financial instruments	(III-2)	260,329,617	197,428,619	457,758,236	147,039,573	195,949,842	342,989,415
3.1 Derivative financial instruments for hedging purposes		5,350,000	7,072,350	12,422,350	300,000	-	300,000
3.1.1 Fair value hedges		-	7,072,350	7,072,350	-	-	-
3.1.2 Cash flow hedges		5,350,000	-	5,350,000	300,000	-	300,000
3.1.3 Net foreign investment hedges		-	-	-	-	-	-
3.2 Derivative financial instruments for trading purposes		254,979,617	190,356,269	445,335,886	146,739,573	195,949,842	342,689,415
3.2.1 Forward foreign currency buy/sell transactions		31,538,387	38,146,281	69,684,668	24,870,396	47,536,027	72,406,423
3.2.1.1 Forward foreign currency transactions-buy		13,865,884	19,944,687	33,810,571	22,384,868	14,826,261	37,211,129
3.2.1.2 Forward foreign currency transactions-sell		17,672,503	18,201,594	35,874,097	2,485,528	32,709,766	35,195,294
3.2.2 Swap transactions related to foreign currency and interest rates		216,212,556	130,937,786	347,150,342	116,853,557	123,530,389	240,383,946
3.2.2.1 Foreign currency swap-buy		2,136,825	36,639,446	38,776,271	2,936,974	56,634,422	59,571,396
3.2.2.2 Foreign currency swap-sell		3,307,883	36,252,562	39,560,445	20,698,341	40,351,509	61,049,850
3.2.2.3 Interest rate swap-buy		105,383,924	29,022,889	134,406,813	46,609,121	13,272,229	59,881,350
3.2.2.4 Interest rate swap-sell		105,383,924	29,022,889	134,406,813	46,609,121	13,272,229	59,881,350
3.2.3 Foreign currency, interest rate and securities options		7,228,674	21,272,202	28,500,876	5,015,620	24,883,426	29,899,046
3.2.3.1 Foreign currency options-buy		3,614,337	10,636,101	14,250,438	2,507,810	12,441,713	14,949,523
3.2.3.2 Foreign currency options-sell		3,614,337	10,636,101	14,250,438	2,507,810	12,441,713	14,949,523
3.2.3.3 Interest rate options-buy		-	-	-	-	-	-
3.2.3.4 Interest rate options-sell		-	-	-	-	-	-
3.2.3.5 Securities options-buy		-	-	-	-	-	-
3.2.3.6 Securities options-sell		-	-	-	-	-	-
3.2.4 Foreign currency futures		-	-	-	-	-	-
3.2.4.1 Foreign currency futures-buy		-	-	-	-	-	-
3.2.4.2 Foreign currency futures-sell		-	-	-	-	-	-
3.2.5 Interest rate futures		-	-	-	-	-	-
3.2.5.1 Interest rate futures-buy		-	-	-	-	-	-
3.2.5.2 Interest rate futures-sell		-	-	-	-	-	-
3.2.6 Other		-	-	-	-	-	-
B. Custody and pledged items (IV+V+VI)		397,353,643	221,781,738	619,135,381	280,775,494	180,756,036	461,531,530
IV. Items held in custody		33,592,128	12,281,455	45,873,583	8,416,392	11,378,959	19,795,351
4.1 Customer fund and portfolio balances		33,050,302	-	33,050,302	8,153,455	-	8,153,455
4.2 Investment securities held in custody		1,909	3,611,580	3,613,489	973	4,169,817	4,170,790
4.3 Checks received for collection		393,746	996,953	1,390,699	115,538	744,003	859,541
4.4 Commercial notes received for collection		146,170	7,588,389	7,734,559	146,425	6,346,543	6,492,968
4.5 Other assets received for collection		-	-	-	-	-	-
4.6 Assets received for public offering		-	-	-	-	-	-
4.7 Other items under custody		1	84,533	84,534	1	118,596	118,597
4.8 Custodians		-	-	-	-	-	-
V. Pledged received		27,472,449	15,301,014	42,773,463	23,382,999	13,823,770	37,206,769
5.1 Marketable securities		132,034	257,957	389,991	273,462	65,837	339,299
5.2 Guarantee notes		204,525	1,342,740	1,547,265	213,389	1,159,053	1,372,442
5.3 Commodity		910	-	910	910	-	910
5.4 Warranty		-	-	-	-	-	-
5.5 Properties		20,871,574	11,642,004	32,513,578	16,455,874	10,291,634	26,747,508
5.6 Other pledged items		6,263,406	2,058,313	8,321,719	6,439,364	2,307,246	8,746,610
5.7 Pledged items-depository		-	-	-	-	-	-
VI. Accepted independent guarantees and warranties		336,289,066	194,199,269	530,488,335	248,976,103	155,553,307	404,529,410
Total off-balance sheet items (A+B)		680,009,572	445,468,663	1,125,478,235	440,135,957	406,392,050	846,528,007

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

(Convenience translation of the unconsolidated financial statements and related disclosures originally issued in Turkish)

ING Bank A.Ş.

Unconsolidated statement of profit or loss

as of 31 December 2024

(Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

Income and expense items		Note	Audited Current period	Audited Prior period
		(section five)	(01/01/2024- 31/12/2024)	(01/01/2023- 31/12/2023)
I.	Interest income	(IV-1)	39,611,527	17,894,168
1.1	Interest on loans		23,423,161	12,615,251
1.2	Interest on reserve requirements		2,961,883	53,115
1.3	Interest on banks		305,910	108,656
1.4	Interest on money market transactions		6,417,504	2,642,305
1.5	Interest on marketable securities portfolio		6,499,747	2,472,409
1.5.1	Financial assets at fair value through profit or loss		292,974	36,772
1.5.2	Financial assets at fair value through other comprehensive income		1,527,951	668,062
1.5.3	Financial assets measured at amortised cost		4,678,822	1,767,575
1.6	Finance lease income		-	-
1.7	Other interest income		3,322	2,432
II.	Interest expense (-)	(IV-2)	(31,883,086)	(15,401,365)
2.1	Interest on deposits		(30,392,584)	(14,162,387)
2.2	Interest on funds borrowed		(919,543)	(957,272)
2.3	Interest on money market transactions		(140,368)	(53,406)
2.4	Interest on securities issued		(121,974)	(33,858)
2.5	Finance lease expense		(34,541)	(37,134)
2.6	Other interest expenses		(274,076)	(157,308)
III.	Net interest income/expense (I - II)		7,728,441	2,492,803
IV.	Net fees and commissions income/expense		1,641,313	960,976
4.1	Fees and commissions received		2,347,283	1,353,797
4.1.1	Non-cash loans		320,094	247,910
4.1.2	Other	(IV-12)	2,027,189	1,105,887
4.2	Fees and commissions paid (-)		(705,970)	(392,821)
4.2.1	Non-cash loans		(6)	(156)
4.2.2	Other	(IV-12)	(705,964)	(392,665)
V	Dividend income	(IV-3)	71,562	661
VI.	Trading gain/(loss) (net)	(IV-4)	1,192,723	2,402,149
7.1	Trading gain/(loss) on securities		(839,888)	(13,551)
7.2	Gain/(loss) on derivative financial transactions		8,504,027	4,435,419
7.3	Foreign exchange gain/(loss)		(6,471,416)	(2,019,719)
VII.	Other operating income	(IV-5)	1,263,357	1,252,312
VIII.	Gross operating income (III+IV+V+VI+VII)		11,897,396	7,108,901
IX.	Expected credit loss (-)	(IV-6)	(652,781)	(621,202)
X.	Other provision expenses (-)		(654,037)	(260,837)
XI.	Personnel expenses (-)		(3,420,403)	(2,321,797)
XII.	Other operating expenses	(IV-7)	(5,316,822)	(3,774,774)
XIII.	Net operating profit/(loss) (VIII-IX-X-XI-XII)		1,853,353	130,291
XIV.	Income resulted from mergers		-	-
XV.	Income/loss from investments under equity accounting		624,544	362,070
XVI.	Gain/loss on net monetary position		-	-
XVII.	Operating profit/loss before taxes (XIII+...+XVI)	(IV-8)	2,477,897	492,361
XVIII.	Provision for taxes of continued operations (±)	(IV-9)	(242,762)	1,205,677
18.1	Current tax provision		(592,416)	(265,762)
18.2	Expense effect of deferred tax (+)		(237,256)	(48,025)
18.3	Income effect of deferred tax (-)		586,910	1,519,464
XIX.	Net profit/(loss) from continuing operations (XVII±XVIII)	(IV-10)	2,235,135	1,698,038
XX.	Income from discontinued operations		-	-
20.1	Income from non-current assets held for resale		-	-
20.2	Profit from sales of associates, subsidiaries and joint ventures		-	-
20.3	Income from other discontinued operations		-	-
XXI.	Expenses for discontinued operations (-)		-	-
21.1	Expenses for non-current assets held for resale		-	-
21.2	Loss from sales of associates, subsidiaries and joint ventures		-	-
21.3	Loss from other discontinued operations		-	-
XXII.	Profit/(loss) before tax from discontinued operations (XX-XXI)		-	-
XXIII.	Tax provision for discontinued operations (±)		-	-
23.1	Current tax provision		-	-
23.2	Expense effect of deferred tax (+)		-	-
23.3	Income effect of deferred tax (-)		-	-
XXIV.	Net profit/(loss) from discontinued operations (XXII±XXIII)		-	-
XXV.	Net profit/(loss) (XIX+XXIV)	(IV-11)	2,235,135	1,698,038
Earnings per share			0.6411	0.4871

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

(Convenience translation of the unconsolidated financial statements and related disclosures originally issued in Turkish)

ING Bank A.Ş.

**Unconsolidated statement of profit or loss and other comprehensive income
for the year ended 31 December 2024
(Amounts expressed in thousands of Turkish Lira (“TL”) unless otherwise stated.)**

		Audited	Audited
Profit or loss and other comprehensive income		Current period	Prior period
		(01/01/2024- 31/12/2024)	(01/01/2023- 31/12/2023)
I.	Current period profit/loss	2,235,135	1,698,038
II.	Other comprehensive income	2,752,679	(348,939)
2.1	Other income/expense items not to be recycled to profit or loss	2,243,208	(50,329)
2.1.1	Gains/(losses) on revaluation of property, plant and equipment	2,686,864	-
2.1.2	Gains/(losses) on revaluation of intangible assets	-	-
2.1.3	Defined benefit plans' actuarial gains/(losses)	(9,355)	(74,907)
2.1.4	Other income/(expense) items not to be recycled to profit or loss	80,570	-
2.1.5	Deferred taxes on other comprehensive income not to be recycled to profit or loss	(514,871)	24,578
2.2	Other income/expense items to be recycled to profit or loss	509,471	(298,610)
2.2.1	Translation differences	154,118	437,954
2.2.2	Income/(expenses) from valuation and/or reclassification of financial assets measured at FVOCI	359,311	(972,045)
2.2.3	Gains/(losses) from cash flow hedges	148,599	(59,619)
2.2.4	Gains/(losses) on hedges of net investments in foreign operations	-	-
2.2.5	Other income/(expense) items to be recycled to profit or loss	-	-
2.2.6	Deferred taxes on other comprehensive income to be recycled to profit or loss	(152,557)	295,100
III.	Total comprehensive income (I+II)	4,987,814	1,349,099

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

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Unconsolidated statement of changes in equity

for the year ended 31 December 2024

(Amounts expressed in thousands of Turkish Lira (“TL”) unless otherwise stated.)

Changes in equity

Statement of changes in shareholders' equity		Other comprehensive income/expense items not to be recycled to profit or loss							Other comprehensive income/expense items to be recycled to profit or loss								

(Convenience translation of the unconsolidated financial statements and related disclosures originally issued in Turkish)

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**Unconsolidated statement of cash flows
for the year ended 31 December 2024**

(Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

Statement of cash flows		Note	Audited	Audited
			Current period	Prior period
			(01/01/2024- 31/12/2024)	(01/01/2023- 31/12/2023)
A.	Cash flows from banking operations			
1.1	Operating profit before changes in operating assets and liabilities		(155,369)	326,896
1.1.1	Interest received		34,960,692	16,125,353
1.1.2	Interest paid		(31,514,233)	(13,814,454)
1.1.3	Dividend received		71,562	661
1.1.4	Fees and commissions received		2,337,611	1,368,860
1.1.5	Other income	(VI-2)	1,263,357	1,252,312
1.1.6	Collections from previously written-off loans and other receivables		337,845	338,868
1.1.7	Payments to personnel and service suppliers		(7,253,581)	(5,194,083)
1.1.8	Taxes paid		(705,063)	(734,337)
1.1.9	Other	(VI-2)	346,441	983,716
1.2	Changes in operating assets and liabilities		16,799,876	11,894,714
1.2.1	Net (increase)/decrease in financial assets at fair value through profit or loss		(1,321,188)	158,269
1.2.2	Net (increase)/decrease in due from bank		(398,313)	(309,383)
1.2.3	Net (increase)/decrease in loans		(5,454,196)	(617,035)
1.2.4	Net (increase)/decrease in other assets	(VI-2)	(1,904,013)	(4,548,900)
1.2.5	Net increase/(decrease) in bank deposits		2,569,028	3,420,105
1.2.6	Net increase/(decrease) in other deposits		21,851,159	17,305,681
1.2.7	Net increase/(decrease) in financial liabilities at fair value through profit or loss		-	-
1.2.8	Net increase/(decrease) in funds borrowed		(3,823,520)	(1,330,794)
1.2.9	Net increase/(decrease) in matured payables		-	-
1.2.10	Net increase/(decrease) in other liabilities	(VI-2)	5,280,919	(2,183,229)
I.	Net cash provided from banking operations		16,644,507	12,221,610
B.	Cash flow from investing activities			
II.	Net cash provided from investing activities		(4,246,368)	(2,620,047)
2.1	Cash paid for acquisition of subsidiaries, investments in associates and joint ventures	(I-8.6)	-	(10,000)
2.2	Cash obtained from disposal of subsidiaries, investments in associates and joint ventures		171,382	-
2.3	Purchases of property and equipment		(497,217)	(380,012)
2.4	Disposals of property and equipment		923,646	284,769
2.5	Cash paid for purchase of financial assets at fair value through other comprehensive income		(3,051,883)	(2,538,446)
2.6	Cash obtained from sale of financial assets at fair value through other comprehensive income		1,661,041	3,045,975
2.7	Cash paid for purchase of financial assets measured at amortised cost	(I-6)	(2,521,541)	(4,174,960)
2.8	Cash obtained from sale of financial assets measured at amortised cost	(I-6)	568,261	2,012,522
2.9	Other	(VI-2)	(1,500,057)	(859,895)
C.	Cash flows from financing activities			
III.	Net cash provided from financing activities		4,922,528	(582,169)
3.1	Cash obtained from funds borrowed and securities issued	(II-4)	5,128,290	-
3.2	Cash used for repayment of funds borrowed and securities issued	(II-4)	-	(428,030)
3.3	Issued equity instruments		-	-
3.4	Dividends paid	(II-12)	-	-
3.5	Payments for finance leases		(205,762)	(154,139)
3.6	Other		-	-
IV.	Effect of change in foreign exchange rate on cash and cash equivalents	(VI-2)	2,632,788	4,661,537
V.	Net increase in cash and cash equivalents (I+II+III+IV)		19,953,455	13,680,931
VI.	Cash and cash equivalents at beginning of the period	(VI-1)	26,546,403	12,865,472
VII.	Cash and cash equivalents at the end of the period	(VI-1)	46,499,858	26,546,403

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

(Convenience translation of the unconsolidated financial statements and related disclosures originally issued in Turkish)

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Statement of profit distribution for the year ended 31 December 2024 (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

Profit distribution table		Audited	Audited
		Current period	Prior period
		(31/12/2024) (*)	(31/12/2023) (*)
I.	Distribution of current year profit		
1.1	Current year profit	2,477,897	492,361
1.2	Taxes and duties payable (-)	242,762	(1,205,677)
1.2.1	Corporate tax (Income tax)	592,416	265,762
1.2.2	Income withholding tax	-	-
1.2.3	Other taxes and duties (****)	(349,654)	(1,471,439)
A.	Net profit for the year (1.1-1.2)	2,235,135	1,698,038
1.3	Prior year losses (-)	-	-
1.4	First legal reserves (-)	-	-
1.5	Other statutory reserves (-)	-	84,902
B.	Net profit available for distribution (A-(1.3+1.4+1.5))	2,235,135	1,613,136
1.6	First dividend to shareholders (-)	-	-
1.6.1	To owners of ordinary shares	-	-
1.6.2	To owners of privileged shares	-	-
1.6.3	To owners of preferred shares	-	-
1.6.4	To profit sharing bonds	-	-
1.6.5	To holders of profit and loss sharing certificates	-	-
1.7	Dividends to personnel (-)	-	-
1.8	Dividend to board of directors (-)	-	-
1.9	Second dividend to shareholders (-)	-	-
1.9.1	To owners of ordinary shares	-	-
1.9.2	To owners of privileged shares	-	-
1.9.3	To owners of preferred shares	-	-
1.9.4	To profit sharing bonds	-	-
1.9.5	To holders of profit and loss sharing certificates	-	-
1.10	Statutory reserves (-)	-	-
1.11	Extraordinary reserves (**)	-	1,611,678
1.12	Other reserves	-	-
1.13	Special funds (***)	-	1,458
II.	Distribution of reserves		
2.1	Appropriated reserves	-	-
2.2	Dividends to shareholders (-)	-	-
2.2.1	To owners of ordinary shares	-	-
2.2.2	To owners of privileged shares	-	-
2.2.3	To owners of preferred shares	-	-
2.2.4	To profit sharing bonds	-	-
2.2.5	To holders of profit and loss sharing certificates	-	-
2.3	Dividends to personnel (-)	-	-
2.4	Dividends to board of directors (-)	-	-
III.	Earnings per share		
3.1	To owners of ordinary shares	0.64	0.49
3.2	To owners of ordinary shares (%)	64.11%	48.71%
3.3	To owners of privileged shares	-	-
3.4	To owners of privileged shares (%)	-	-
IV.	Dividend per share		
4.1	To owners of ordinary shares	-	-
4.2	To owners of ordinary shares (%)	-	-
4.3	To owners of privileged shares	-	-
4.4	To owners of privileged shares (%)	-	-

(*) Profit distribution is realized in accordance with Bank's General Meeting decision and as of the preparation date of the financial statements, 2024s annual ordinary general meeting has not been held yet. In accordance with the regulations in Turkey, companies do not make profit distribution based on consolidated financials. In this respect, the profit distribution tables stated above belong to the Bank.

(**) According to Ordinary General Meeting dated 26 March 2024, among total distributable profit for the year 2023, TL 174,313 has been classified as first dividend share, while TL 1,437,365 are kept as extraordinary reserves.

(***) According to Ordinary General Meeting dated 26 March 2024, amounting to TL 1,458 of distributable profit for the year 2023 is composed of the benefit of Corporate Tax exemption on real estate sales profit and related amount is transferred to separate fund under equity in accordance with Corporate Tax Law 5520 article 5. and 1. paragraph clause (e).

(****) Deferred Tax expense / income.

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

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Notes to the unconsolidated financial statements

as of 31 December 2024

(Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

Section three

Accounting policies

I. Explanations on basis of presentation

a. The preparation of the unconsolidated financial statements and related notes and explanations in accordance with the Turkish Accounting Standards and regulation on the Regulation on Accounting Applications for Banks and Safeguarding of Documents

The unconsolidated financial statements have been prepared in accordance with the "Regulation on Accounting Applications for Banks and Safeguarding of Documents" and other regulations, communiqués, explanations and circulars promulgated by the Banking Regulation and Supervision Agency ("BRSA") in relation to accounting and financial reporting principles of banks and for the issues not regulated by as per Turkish Financial Reporting Standards ("TFRS") issued by the Public Oversight Accounting and Auditing Standards Authority ("POA") (hereafter, referred as "BRSA Accounting and Financial Reporting Legislation"). The Bank maintains its books in Turkish Lira in accordance with the Banking Law, Turkish Commercial Code and Turkish Tax Legislation. TFRS contains Turkish Accounting Standards ("TAS"), Turkish Financial Reporting Standards and explanations and interpretations related to the standards.

The unconsolidated financial statements have been prepared at Turkish Lira on a historical cost basis, except for the financial assets and financial liabilities measured on a fair value basis.

The preparation of unconsolidated financial statements in conformity with BRSA Accounting and Financial Reporting Legislation requires the use of certain critical accounting estimates and assumptions by the Bank management to exercise its judgment on the assets and liabilities of the balance sheet and contingent issues as of the balance sheet date. These estimates and assumptions include fair value calculation of financial instruments and impairment of financial assets are being reviewed regularly and, when necessary, adjustments are made and the effects of these adjustments are reflected to the statement of profit or loss.

b. Accounting policies and valuation principles applied in the preparation of financial statements

The accounting policies and valuation principles applied in the preparation of unconsolidated financial statements are determined and applied in accordance with BRSA Accounting and Financial Reporting Legislation. The accounting policies adopted in the preparation of the unconsolidated financial statements are consistent with the standards used in the previous year.

c. Changes in accounting policies and disclosures

New and revised Turkish Accounting Standards effective for annual periods beginning on or after 1 January 2024 have no material effect on accounting policies, financial position and financial performance of the Bank. New and revised TAS and TFRS issued but not yet effective as of the finalization date of the financial statements will not have material effect on accounting policies, financial position and financial performance of the Bank.

Entities whose functional currency is the currency of a hyperinflationary economy present their financial statements in terms of the measuring unit current at the end of the reporting period according to "TAS 29 Financial Reporting in Hyperinflation Economies". Based on the announcement made by Public Oversight, Accounting and Auditing Standards Authority (POA) on 23 November 2023, entities applying Turkish Financial Reporting Standards (TFRS) are required to present their financial statements by adjusting for the impact of inflation for the annual reporting period ending on or after 31 December 2023, in accordance with the accounting principles specified in TAS 29. In the same announcement, it was stated that institutions or organizations authorized to regulate and supervise in their respective scope might determine different transition dates for the implementation of inflation accounting, and in this context, Banking Regulation and Supervision Agency (BRSA) announced that financial statements of banks, financial leasing, factoring, financing, savings financing and asset management companies as of 31 December 2023 would not be subject to the inflation adjustment in accordance with BRSA Board decision on 12 December 2023. BRSA also announced that banks, financial leasing, factoring, financing, savings financing and asset management companies are required to apply inflation adjustment as of 1 January 2025 in accordance with BRSA Board decision on 11 January 2024. However, in accordance with the later decision of the BRSA dated 5 December 2024 and numbered 11021, it was announced that inflation accounting would not be applied in 2025.

Accordingly, "TAS 29 Financial Reporting Standard in High Inflation Economies" is not applied in the financial statements of the Bank as of 31 December 2024.

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Notes to the unconsolidated financial statements

as of 31 December 2024

(Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

I. Explanations on basis of presentation (continued)

In September 2023, POA issued amendments to TAS 12, which introduce a mandatory exception in TAS 12 from recognizing and disclosing deferred tax assets and liabilities related to Pillar Two income taxes. The amendments clarify that TAS 12 applies to income taxes arising from tax laws enacted or substantively enacted to implement the Pillar Two Model Rules published by the Organization for Economic Cooperation and Development (OECD). The amendments also introduced targeted disclosure requirements for entities affected by the tax laws. The temporary exception from recognition and disclosure of information about deferred taxes and the requirement to disclose the application of the exception apply immediately and retrospectively upon issue of the amendments. The amendments did not have a significant impact on the financial position or performance of the Bank.

II. Explanations on the strategy of using financial instruments and foreign currency transactions

The Bank manages its financial instruments strategies according to its liability structure. The liability structure is mainly comprised of deposits. The investment instruments are generally chosen from liquid instruments. Thus, liquidity is sustained to meet liabilities. As reporting date, the Bank's asset and shareholder's equity structure is sufficient to meet its liabilities.

Due to the risks management policy, the Bank does not take significant currency positions. In case of a currency risk due from the customer transactions, the Bank makes contra transactions in order to close the position.

The investment decisions are made taking the balance sheet items' maturity structure and interest rates into consideration. Limits related to the balance sheet are determined. The distribution of assets is determined and income analyses are made according to this distribution.

When carrying out off-balance sheet forward transactions, the Bank aims to perform contra transactions as well, thus paying maximum attention to the currency and interest rate risks. The customer limits for transactions are determined.

Explanations on foreign currency transactions:

Translation gains and losses arising from foreign currency transactions are accounted for within the period in which the transaction occurs. In period-ends, foreign currency denominated monetary assets and liabilities are translated into TL with the exchange buying rates of the Bank prevailing at the reporting date. Gains and losses arising from such transactions are recognized in the statement of profit or loss under the account of foreign exchange gains or losses.

III. Information related to consolidated subsidiaries

"Communique on amending the Communique on the Turkish Accounting Standard 27 ("TAS 27") Separate Financial Statements" has been published in the Official Gazette dated 9 April 2015 and numbered 29321 to be applied for accounting periods after 1 January 2016.

Entities have the opportunity to recognize their investments in associates, subsidiaries and joint ventures with equity method in their separate financial statements in line with the amendment while it is stated for entities preparing separate financial statements before the amendment in communique to recognize their investments in associates, subsidiaries and joint ventures in accordance with cost value or TFRS 9 Financial Instruments standard.

The Bank account for its financial subsidiaries in the unconsolidated financial statements as of 31 December 2021 according to the equity method within the scope of TAS 27.

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as of 31 December 2024

(Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

IV. Explanations on forward and options contracts and derivative instruments

The Bank's derivative instruments consist of forward buy/sell, swaps, futures, and options contracts.

Derivative financial instruments of the Bank are classified as "Derivative Financial Assets Designated at Fair Value through Profit or Loss" per "TFRS 9 Financial Instruments" ("TFRS 9").

Derivatives are initially recorded at their fair values. The related transaction costs are recognized in profit or loss statement at the date they incur. In accordance with the classification of derivative financial instruments, if the fair value is positive, the amount is classified as "Derivative Financial Assets Designated at Fair Value Through Profit or Loss", if the fair value is negative, the amount is classified as "Derivative Financial Liabilities Designated at Fair Value Through Profit or Loss". The fair value differences of derivative financial instruments are recognized in the statement of profit or loss under trading profit/loss line in profit/loss from derivative financial transactions. The fair value of derivative instruments is calculated by taking into account the market value of the derivatives or by using the discounted cash flow model.

The Bank, use the TL OIS interest rate curve in order to more accurately reflect the fair value measurement for CBRT and BIST swap transactions and made the necessary fair value measurement arrangements.

Payables and receivables arising from the derivative instruments are recorded in the off-balance sheet accounts at their contractual values.

Explanations on derivative financial instruments held for hedging purpose

As permitted by TFRS 9, the Bank continues to apply hedge accounting in accordance with "TAS 39 Financial Instruments: Recognition and Measurement" ("TAS 39").

The Bank applies cash flow hedge accounting using interest rate and cross currency swap transactions, in order to hedge its TL floating rate deposits and revolving loans. Within the scope of cash flow hedge accounting, change in fair value of the hedging instrument, being positive or negative, is accounted in "Derivative financial assets measured at fair value through other comprehensive income" or "Derivative financial liabilities at fair value through other comprehensive income", respectively, in the balance sheet. The Bank implements effectiveness tests at the balance sheet dates for hedge accounting; the effective parts are accounted as defined in TAS 39, in financial statements under equity "Accumulated other comprehensive income or expense to be reclassified to profit or loss" whereas the amount concerning ineffective parts is recognised in profit or loss statement. The changes recognized in shareholders' equity is removed and included in profit or loss statement in the same period when the hedged cash flows effect the income or loss.

Fixed interest rate foreign currency borrowings of the Bank are subject to hedged under fair value hedges. The fair value risks of relevant fixed-rate financial assets are protected by interest rate swaps. In periods when the relationship between the hedging instrument and the hedged item is effectively measured; within the scope of fair value hedge accounting, changes in the fair value of the hedged item are recognized in profit or loss.

Effectiveness tests are performed at the beginning of the hedge accounting period and at each reporting period. The effectiveness tests are carried out using the "Dollar off-set model" and the hedge accounting is applied as long as the test results are between the ranges of 80%-125% of effectiveness.

The hedge accounting is discontinued when the hedging instrument expires, is exercised, sold or no longer effective. When discontinuing fair value hedge accounting, the cumulative fair value changes in carrying value of the hedged item arising from the hedged risk are amortised to profit or loss statement under trading account income/loss caption over the maturity of the hedged item from that date of the hedge accounting is discontinued. While expiring, sale, discontinuing cash flow hedge accounting or when no longer effective the cumulative gains/losses recognised in shareholders' equity until the cash flows of the hedged item are realized and presented under "accumulated other comprehensive income or expense to be reclassified to profit or loss" are continued to be kept in this account.

When the cash flows of hedged item incur, the gain/losses accounted for under shareholders' equity are recognised in profit or loss statement considering the original maturity.

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V. Explanations on interest income and expenses

Interest income and expenses are recognized on an accrual basis using the effective interest method (the rate which equals the future cash flows of a financial asset or liability to its net book value) by taking into consideration present principal amount.

As of 1 January 2018, the Bank applies the effective interest rate on the amortized cost of the asset for subsequent reporting periods for the financial assets impaired and classified as non-performing loan. Such interest income calculation is based on contractual basis for all financial assets subject to impairment calculation. During calculation of loss given default rate in expected credit loss models effective interest rate is used, thus, calculation of expected credit losses includes calculated interest amount. Therefore, a reclassification is made between the accounts of "Expected Credit Losses" and "Interest Income from Loans" for such calculated interest amount. If the credit risk of the financial instrument improves to the extent that the financial asset is no longer considered as impaired and the improvement can be attributed to an incident that eventually takes place (such as an increase in the loan's credit rating), the system calculates interest income at subsequent reporting periods by applying the effective interest rate to the gross amount.

VI. Explanations on fee and commission income and expenses

Fees and commissions except for which are integral part of the effective interest rates of financial instruments measured at amortized costs, are accounted for in accordance with "TFRS 15 Revenue from Contracts with Customers". Depending on the nature of the transaction, fee and commission income / expenses are recorded on an accrual basis or using the effective interest method during the service period. Income generated by contract or through the purchase of assets for third parties are recognized in the income accounts according to the periods in which they are realized.

VII. Explanations on financial instruments

Initial recognition of financial instruments

A financial asset or a financial liability is recognized in the statement of financial position only when it is a party to the contractual provisions of the financial instrument. A regular way purchase or sale of financial assets shall be recognised and derecognised, as applicable, using trade date accounting or settlement date accounting. Purchase and sale transactions of securities are accounted at the settlement date.

Initial measurement of financial instrument

The classification of financial instruments at initial recognition depends on the contractual conditions and the relevant business model. Except for the assets in the scope of "TFRS 15 Revenue from Contracts with Customers", at initial recognition, the Bank measures financial asset or financial liabilities at fair value plus or minus, in the case of a financial asset or financial liability not at fair value through profit/loss, transaction costs that are directly attributable to the acquisition or issue of the financial asset or financial liability.

Classification of financial instruments

On which category a financial instruments shall be classified at initial recognition depends on both the business model for managing the financial assets and the contractual cash flow characteristics of the financial asset. Thus, the Bank has classified all financial assets beginning from 1 January 2018 on the basis of the business model used for the management of these assets and the contractual cash flows.

As per TFRS 9, the Bank classifies a financial asset on the basis of its contractual cash flow characteristics if the financial asset is held within a business model whose objective is to hold assets to collect contractual cash flows or within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets. In order to assess whether the element provides consideration for only the passage of time, an entity applies judgement and considers relevant factors such as the currency in which the financial asset is denominated and the period for which the interest rate is set. When the contractual conditions are exposed to the risks which are not consistent with the basic lending arrangement or variability of cash flows, the relevant financial asset is measured at fair value through profit or loss. The Bank has tested the "Whether Contractual Cash Flows Solely Payments of Principal and Interest" test for all financial assets within the scope of TFRS 9 transition and evaluated asset classifications within the business model.

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(Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

VII. Explanations on financial instruments (continued)

Assessment of business model

As per TFRS 9, the business model is determined at a level that reflects how groups of financial assets are managed together to achieve a particular business objective.

The Bank's business models are divided into three categories.

A business model whose objective is to hold assets in order to collect contractual cash flows:

A business model whose objective is to hold assets in order to collect contractual cash flows are managed to realise cash flows by collecting contractual payments over the life of the instrument. The financial assets that are held within the scope of this business model are measured at amortised cost when the contractual terms of the financial asset meet the condition of giving rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding. Central Bank, banks, money market placements, financial assets measured at amortized cost, loans, lease receivables, factoring receivables and other receivables are evaluated within this business model.

A business model whose objective is achieved by both collecting contractual cash flows and selling financial assets:

The business model in which financial assets are held both for the collection of contractual cash flows and for the sale of financial assets. Fair value change of the financial assets that are held within the scope of this business model are accounted under other comprehensive income when the contractual terms of the financial asset meet the condition of giving rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding. Financial assets measured at fair value through other comprehensive income are evaluated within this business model.

Other business models:

Financial assets are measured at fair value through profit or loss if they are not held within a business model whose objective is to hold assets to collect contractual cash flows or within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets. Financial assets measured at fair value through profit/loss derivative financial instruments are evaluated within this business model.

Measurement categories of financial assets and liabilities

According to TFRS 9, the Bank's financial assets are classified in three main categories as listed below:

- Financial assets measured at fair value through profit/loss
- Financial assets measured at fair value through other comprehensive income and
- Financial assets measured at amortized cost (including credits).

Financial assets measured at fair value through profit/loss:

Financial assets at fair value through profit/loss are financial assets other than the ones that are managed with business model that aims to collect contractual cash flows or business model that aims to collect both the contractual cash flows and cash flows arising from the sale of the assets; and if the contractual terms of the financial asset do not lead to cash flows representing solely payments of principal and interest at certain date; that are either acquired for generating a profit from short-term fluctuations in prices or are financial assets included in a portfolio aiming to short-term profit making. Financial assets at the fair value through profit or loss are initially recognized at fair value and remeasured at their fair value after recognition. All gains and losses arising from these valuations are recognized in profit or loss.

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Notes to the unconsolidated financial statements

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VII. Explanations on financial instruments (continued)

Financial assets measured at fair value through other comprehensive income:

As per TFRS 9, the financial investments are measured at fair value through other comprehensive income if financial asset is held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets and contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

Financial assets at fair value through other comprehensive income are recognized by adding transaction cost to acquisition cost reflecting the fair value of the financial asset. After the recognition, financial assets at fair value through other comprehensive income are remeasured at fair value. Interest income calculated with effective interest rate method arising from financial assets at fair value through other comprehensive income and dividend income from equity securities are recorded to statement of profit or loss. “Unrealized gains and losses” arising from the difference between the amortized cost and the fair value of financial assets at fair value through other comprehensive income are not reflected in the statement of profit or loss of the period until the acquisition of the asset, sale of the asset, the disposal of the asset, and impairment of the asset and they are accounted under the “Accumulated Other Comprehensive Income or Expenses to be Reclassified to Profit or Loss” under shareholders’ equity. The financial assets when collected or disposal the accumulated of fair value differences reflected in equity and recognized as profit or loss.

Equity securities, which are classified as financial assets at fair value through other comprehensive income, that have a quoted market price in an active market and whose fair values can be reliably measured are carried at fair value. Equity securities that do not have a quoted market price in an active market and whose fair values cannot be reliably measured are carried at cost, less provision for impairment. In this context, the Bank has evaluated that the costs of equity securities, which are classified as financial assets measured at fair value through other comprehensive income, has been assessed that they reflect the approximate fair values. The fair value level of the related assets has been determined as Level 3.

The Bank has inflation indexed (“CPI”) government bonds in its financial assets at fair value through other comprehensive income and measured at amortized cost portfolios. CPI government bonds that are their real principal amounts are preserved from inflation. These marketable securities are valued and accounted according by using effective interest rate method by considering the reference inflation index at the issue date and estimated inflation rate together with the based on the index calculated. The reference indices used for the real interest payments about these marketable securities is determined based on the CPI’s of two months before. The Bank determines the estimated inflation rates used for valuation of securities in line with this. The estimated inflation rate used is updated during the year when necessary. At the end of the year, the actual inflation rate is used.

During initial recognition an entity can choose in an irrevocable way to record the changes of the fair value of the investment in an equity instrument that is not held for trading purposes in the other comprehensive income. In the case of this preference, the dividend from the investment is taken into the financial statements as profit or loss.

Financial assets measured at amortized cost:

Financial assets that are held for collection of contractual cash flows where those cash flows represent solely payments of principal and interest are classified as financial assets measured at amortized cost.

Financial assets measured at amortized cost are initially recognized at acquisition cost including the transaction costs which reflect the fair value of those instruments and subsequently recognized at “Amortized cost” by using “Effective interest rate method”. Interest income obtained from financial assets measured at amortized cost is accounted in statement of profit or loss.

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Notes to the unconsolidated financial statements

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VII. Explanations on financial instruments (continued)

Loans:

Loans represents financial assets other than those held for trading in short term or generated through providing money, commodity and services to debtors.

Loans are financial assets with fixed or determinable payments and not quoted in an active market.

Loans are initially recognized at acquisition cost plus transaction costs presenting their fair value and thereafter measured at amortized cost using the effective interest rate method.

The Bank's all loans are recorded under the "Loans Measured at Amortized Cost" account.

VIII. Explanations on impairment of financial assets

With the "Regulation on the Procedures and Principles for Determination of Qualifications of Loans and Other Receivables by Banks and Provisions to be Set Aside (Provision Regulation)" promulgated in the Official Gazette, no. 29750, dated 22 June 2016, the Bank has started calculating provisions as of 1 January 2018, in scope of TFRS 9 for financial instruments, loans and other receivables. Accordingly, loss allowance for expected credit losses is recognized for the financial assets measured at amortised cost and financial assets measured at fair value through other comprehensive income.

Per TFRS 9, loss allowance for expected credit losses is recognised on financial assets measured at amortised cost, financial assets measured at fair value through other comprehensive income, loan commitments and financial guarantee contracts not measured at fair value through profit or loss. Expected credit loss estimates should include objective information weighted according to possibilities and that can be supported about past events, existing conditions and predictions about future economic conditions.

Financial assets within the scope of TFRS 9 are allocated to the three stages according to the change in the quality of the loan after initial recognition and are calculated on the basis of the expected credit loss stage:

- **Stage 1:** For the financial assets at initial recognition or that do not have a significant increase in credit risk since initial recognition. Impairment for credit risk is recorded in the amount of 12-month expected credit losses.
- **Stage 2:** In the event of a significant increase in credit risk since initial recognition, the financial asset is transferred to Stage 2. Impairment for credit risk is determined on the basis of the instrument's lifetime expected credit losses.

A financial asset is transferred from Stage 1 to Stage 2 when there is a significant increase in credit risk after initial recognition. Bank has established a framework which incorporates quantitative and qualitative information to identify significant risk increase on an asset level applying a relative assessment. Each financial asset is assessed at the reporting date to determine significant risk increase.

Bank considers the following criteria.

Quantitative criteria: The change in lifetime probability of default is the main trigger the transfer between Stage 1 and Stage 2. The trigger compares probability of default at the origination date versus probability of default at the reporting date, considering the remaining maturity. Assets can be transferred in both directions between Stage 1 and Stage 2. In order to determine if movements can be considered as significant, Bank implements different probability of default thresholds to evaluate absolute and relative changes occurring in both retail and corporate portfolios. Related thresholds are being analyzed by back-testing and revised accordingly if necessary.

Qualitative criteria: Bank considers several indicators aligned with those used in credit risk management. Specific qualitative criteria for retail and corporate portfolio has been defined, according to its particularities and with the policies currently in use. The use of these qualitative criteria is complemented with the use of expert judgement.

- Having past due more than legal regulations,
- Loans classified to watch list status according to the decision of the Bank's management,
- Restructured loans in compliance with "Regulation on the Procedures and Principles for Determination of Qualifications of Loans and Other Receivables by Banks and Provisions to be Set Aside",
- Restructured loans according to an administrative judgement,
- Loans classified in scope of collective significant increase in credit risk,
- Other consumer loans of individual clients whose one of the consumer loan transferred to non-performing loan portfolio.

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VIII. Explanations on impairment of financial assets (continued)

- **Stage 3:** Stage 3 includes financial assets that have objective evidence of impairment at the reporting date. For these assets, lifetime expected credit losses are recognized and interest revenue is calculated on the net carrying amount.

The following criteria are taken into consideration in determining the impairment:

- Having past due more than legal regulations,
- Problems in aspect of client's creditworthiness,
- Collaterals and/or debtor's equities are insufficient for the timely payment of receivables,
- Collection of receivables is considered to be delayed for more than legal regulations due to macroeconomic, industry specific or customer specific reasons.

Use of present, past, future information and macroeconomic predictions:

Expected loss estimations take into consideration multiple macroeconomic scenarios for which the probability is measured according to past events, existing conditions and predictions about future economic conditions for economic variables (such as unemployment rates, GDP growth, real estate prices index and interest rates). Bank has defined three macroeconomic scenarios to use for future predictions, a baseline, an up-scenario and a down-scenario. Macroeconomic models are used to convert the parameters used in expected loss estimations to forward looking versions. Different models exist for large corporate, financial institutions, commercial, retail mortgage and retail portfolios.

Expected credit loss measurement:

Bank applies "Probability of Default x Exposure at Default x Loss Given Default" method which also takes the time value of money into account. For Stage 1 financial assets; a forward-looking approach on a twelve-month period is applied in order to calculate expected credit loss. For Stage 2 financial assets; a lifetime expected loss is calculated. The lifetime expected loss is the discounted sum of the portions of lifetime losses related to default events within each period of twelve months till maturity. For Stage 3 financial assets; the probability of default equals 100%, the loss given default and the exposure at default represent a lifetime expected loss calculated based on properties of the defaulted loan.

Disclosures on write-off policy:

The amendment with respect to the regulation on the "Principles and Procedures Regarding the Classification of Loans and Reserves Set Aside for These Loans" entered into force with its publication in the Official Gazette no.31533 on 6 July 2021. Pursuant to the regulation, the Bank may write-off the portion of the loans, classified as "Fifth Group - Loans Classified as Loss", for which there is no reasonable expectation of recovery, within the scope of TFRS 9, as of the first reporting period (interim or year-end reporting period) following their classification in this Group, deducted from the records within the period deemed appropriate by the Bank, taking into account the situation of the debtor. The Bank performs objective and subjective assessments whether there is a reasonable expectation.

Partial write-off transactions from the financial statements mean that the financial asset will be reimbursed at a certain rate by the debtor, and the amount remaining after the payment of the amount in question or the part of the bank that is classified under group 5 and which does not have reasonable expectations to be recovered.

IX. Explanations on offsetting financial assets

Financial assets and liabilities are shown on the balance sheet at their net amounts when the Bank has a legally enforceable right to offset the recognized amounts and intends to settle the related financial assets and liabilities on a net basis, or to realize the asset and settle the liability simultaneously.

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X. Explanations on sales and repurchase agreements and securities lending transactions

Marketable securities sold under repurchase agreements ("Repo") are classified as financial assets whose fair value difference is reflected on profit-loss, and which are other comprehensive income or will be measured at amortised cost, in parallel to the classification of financial instruments. Funds provided in return for repo transactions are recognized in the "Funds provided by repo transactions" accounts. The income related to repurchase agreements are reflected to the interest income on marketable securities and expenses paid in relation to repurchase agreements are recognized in "interest on money market borrowings" accounts.

Securities ("Reverse repo") that are purchased with repurchase agreements are classified under "Receivables from reverse repo transactions". Interest income obtained from reverse repo transactions are recognized under the account "Interest obtained from money market transactions".

Securities lending transactions are classified under "Money Market Placements" and accruals are calculated for the interest expense occurred.

XI. Explanations on property and equipment held for sale and related to discontinued operations and on payables regarding these assets

Property and equipment held-for-sale consist of tangible assets that were acquired due to non-performing loans and receivables, and are accounted in the financial statements in accordance with the regulations of "Turkish Financial Reporting Standard for Assets Held for Sale and Discontinued Operations TFRS 5".

The assets that meet the criteria of being classified under assets held for sale are measured at the lower of their book values or fair value less costs to be incurred for sale, depreciation for these assets is ceased and these assets are presented separately in the balance sheet. In order for an asset to be classified as an asset held for sale, the related asset (or the asset group to be disposed) shall be ready to be sold immediately under usual conditions and should have a high possibility to be sold. To have a high possibility of a sale or sales, a plan should have been made for the sale of the asset (or the asset group to be disposed) and an active program should have been started by the management, aiming to complete the plan and determine the buyers.

A discontinued operation is a part of an entity which is classified as to be disposed or held for sale. The results related to discontinuing operations are presented separately in the statement of profit or loss. The Bank does not have any discontinued operations.

XII. Explanations on goodwill and other intangible assets

The intangible assets are measured at their cost calculated by adding the acquisition costs and other direct costs necessary for making the asset in working order. Subsequently, intangible assets are carried at cost less accumulated depreciation and provision for value decrease.

Intangible assets are depreciated according to straight line method and depreciation rates are determined in line with the useful lives of related assets.

The intangible assets

13% - 33%

According to TAS 38, Bank's classified as intangible assets are mainly software programs. Useful lives of the these assets are determined 3-8 years, taking into the expected useful life of the asset, technical, technological or other types of obsolescence and maintenance costs necessary to obtain the expected economic benefits from the asset.

The Bank does not have goodwill.

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XIII. Explanations on property and equipment

Property and equipment are initially measured at cost calculated by adding the acquisition fees and any directly attributable costs for making the asset in working order. Subsequently, property and equipment are carried at cost less accumulated depreciation and provision for value decrease.

As of 2024, the Bank has been decided to apply revaluation model for properties recorded under tangible assets instead of cost model in accordance with the "TAS 16 Property, Plant and Equipment Standard". The revaluation difference arising from the valuations performed by independent expertise firms for real estates which is registered in the Banks ledger is accounted under revaluation surplus on tangible assets under equity.

If there is evidence of impairment, the Bank estimates recoverable amount of relevant asset's within the framework of the "Turkish Accounting Standard Impairment of Assets" ("TAS 36") and if the recoverable amount is less than the carrying value of the related asset, a provision for impairment loss is provided.

Property and equipment are depreciated according to straight line method and depreciation rates are determined in line with the useful lives of related assets.

Immovables	2%
Movables, assets acquired by financial leasing	2% - 50%
Right-of-use assets	9% - 50%

The depreciation is set aside at the amount calculated through proportion of the yearly depreciation amount foreseen for the assets held for less than one accounting period to the time for which the asset is held in asset.

Gains and losses on the disposal of property and equipment are reflected to the profit and loss of the related period.

Expenditures for the repair and maintenance of property and equipment are recognized as expense. There is no injunction, pledge or mortgage on property and equipment. There is no purchase commitment related to property and equipment.

XIV. Explanations on investment properties

"TAS 40 Investment Properties" was republished in the Official Gazette no. 29826 dated 16/04/2018 and as a Board Decision to be implemented in the accounting periods starting after 01/01/2005. The purpose of this standard; to determine the rules regarding the accounting and disclosure of investment properties. Rather than use in the production of goods and services, for administrative purposes, or for sale in the normal course of business, land and buildings held for the purpose of earning rent or appreciation, or both; its classified as investment property. As of 2024, the Bank changing the existing accounting policy, it has been decided to apply fair value model for investment properties instead of cost model in accordance within the scope of "Investment Property TAS 40" standard. The Bank's does not have investment properties as of 31 December 2024.

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XV. Explanations on leasing transactions

a. Accounting of leasing operations as lessor

The Bank does not have any leasing operations as "lessor".

b. Accounting of leasing operations as lessee

Assets acquired under financial leases are capitalized at lower of the fair values of leased assets or discounted value of lease installments. While the total amounts of lease amounts are recognized as liability, the related interest amounts are accounted for as deferred interest. Assets subject to financial leases are followed under property and equipment and are depreciated by using straight-line method. The estimated depreciation rates are determined according to their estimated useful lives.

The Bank performs operating lease for branches. With the "TFRS 16 Leases" standard which became effective as of 1 January 2019, the difference between the operating lease and financial lease has been removed and the lease transactions are started to be recognised under "Tangible Fixed Assets" as an asset (right of use asset) and under "Liabilities from Leasing" as a liability. Other operating leases are not considered within the scope of TFRS 16 as they are below the materiality level and the corresponding rent payments are recognized under "Other Operating Expenses".

The Bank – as lessee:

The Bank assesses whether a contract is (or contains) a lease at the inception of the contract. A contract is a lease contract or contains a lease on the basis of whether the right to control the use of an identified asset is being transferred for a period of time, against remuneration. In this case, at the commencement date, the right-of-use assets are recognized under "Tangible Assets" and lease liabilities are recognized under "Lease Payables" by the Bank.

The Bank initially measures the right-of-use asset applying a cost model in the financial statements and it includes the following:

- (a) Lease liabilities in the balance sheet, initially measured at the present value,
- (b) Remaining lease payment amount before or at the commencement date, after all lease incentives are eliminated,
- (c) All initial direct costs beared by the Bank and
- (d) An estimate of costs to be incurred by the lessee in dismantling and removing the underlying asset, restoring the site on which it is located or restoring the underlying asset to the condition required by the terms and conditions of the lease.

The Bank measures the right-of-use asset at cost less any accumulated depreciation and any accumulated impairment losses; and adjusted for any remeasurement of the lease liability.

The Bank applies the depreciation requirements in "TAS 16 Property, Plant and Equipment" standards in depreciating the right-of-use asset.

At the commencement date, the Bank measures the lease liability at the present value of the lease payments that are not paid at that date. The lease payments, interest rate implicit in the lease can be easily determined is discounted using this rate. The lease payments are discounted using the alternative borrowing interest rate.

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XV. Explanations on leasing transactions (continued)

At the commencement date, the lease payments included into the measurement of lease liabilities are composed of payments will be made during the underlying asset's lease term and payments that are not made at the commencement date are indicated below:

- (a) Remaining amount of fixed payments after elimination of any lease incentives receivable,
- (b) Variable future lease payments resulting from a change in an index or a rate used to determine those payments' initial measurement at the commencement date,
- (c) Amounts expected to be payable under a residual value guarantee by the Bank,
- (d) Purchasing option's cost if the Bank is sure at a reasonable level that purchasing option will be used and
- (e) Payment of the fine due to the termination of the lease if the lease period refers to an option for the termination of the lease.

After the commencement date, the Bank measures the lease liability as indicated below:

- (a) Measures the lease liability by increasing the carrying amount to reflect interest on the lease liability,
- (b) Measures the lease liability by reducing the carrying amount to reflect the lease payments made and
- (c) Remeasures the carrying amount to reflect any reassessment or lease modifications, or to reflect revised in-substance fixed lease.

XVI. Explanations on provisions, contingent assets and liabilities

Provisions and contingent liabilities are accounted in accordance with, "Provisions, Contingent Liabilities and Contingent Assets" ("TAS 37").

Provisions are recognized when there is a present legal or constructive obligation as a result of past events at the balance sheet date; when it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and when a reliable estimate can be made of the amount of the obligation.

Provisions are set aside for highly probable and reliably estimated amount of liabilities arisen as a result of prior period events, at the time when such liabilities arise.

XVII. Explanations on obligations related to employee rights

Provision for employee severance benefits has been accounted for in accordance with "TAS 19 Employee Benefits" ("TAS 19").

In accordance with the existing social legislation in Turkey, the Bank is required to make lump-sum termination indemnities including retirement and notice payments to each employee whose employment is terminated due to resignation or for reasons other than misconduct. The retirement pay is calculated for every working year within the Bank over salary for 30 days or the official ceiling amount per year of employment and the notice pay is calculated for the relevant notice period time as determined based on the number of years worked for the Bank.

The Bank has calculated provision for employee severance benefits in the attached financial statements in accordance with Turkish Accounting Standard for Employee Benefits TAS 19 by using the "Projection Method" and discounted the total provision by using the current market yield on government bonds based on their previous experience in the issues of completion of personnel service period and severance pay eligibility. Actuarial gains and losses are recognized under equity in accordance with the TAS 19 standard.

In accordance with the existing social legislation in Turkey, the Bank is required to make contribution to Social Security Institution ("SSI") on behalf of their employees. Other than the contributions that the Bank is required to pay, there is no additional requirement to make payment to neither their employees nor SSI. These premiums are reflected to personnel expenses when they accrue.

Provision for the employees' unused vacations has been booked in accordance with TAS 19 and reflected to the financial statements.

There are no foundations, pension funds or similar associations of which the employees are members.

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XVIII. Explanations on taxation

a. Current tax

The Bank is subject to tax legislation and practices effective in Turkey.

While corporate tax which is applied to corporate earnings at the rate of 20% in Turkey, in accordance with the regulation introduced by the Law No. 7394 on the "Law on Evaluation of Immovable Property Owned by the Treasury and Amendment to the Value Added Tax Law", this rate has been determined to be applied as 25% for the corporate earnings of 2022 and later taxation periods for the banks, companies within the scope of Law No. 6361, electronic payment and money institutions, authorized foreign exchange institutions, asset management companies, capital market institutions, insurance and reinsurance companies and pension companies. In accordance with the Law numbered 7456 which is published in Official Gazette dated 15 July 2023 and numbered 32249, the corporate tax rate for the banks has been determined as 30%. This rate starting from the declarations of 1 October 2023 and to be valid for to the earnings to be obtained in 2023 and the following accounting periods.

The corporate tax rate is applied to the net corporate income after the addition of expenses not subject to deduction according to tax legislation, deduction of exemptions in tax laws (such as participation earnings exemption) and application of tax relief (reduction). No further tax is paid if the profit is not distributed.

By tax-resident corporations within under the article 94 of the Income Tax Law and the articles 15 and 30 of the Corporate Tax Law;

- Full taxpayer to real persons,
- Those who are not taxpayers of income and corporate taxes and those who are exempt from these taxes,
- To limited taxpayer institutions, excluding those that obtain dividends through a workplace or permanent representative in Türkiye,
- Limited taxpayer to real persons,
- For non-limited taxpayers who are exempt from income and corporate taxes,

There was a 10% withholding tax on distributed dividends (adding the profit to the capital does not count as profit distribution). In other words, there is no tax deduction on the dividends distributed by fully taxpayer institutions to fully taxpayer institutions and non-resident taxpayer corporations that obtain dividends through a workplace or permanent representative in Türkiye.

With the Presidential Decision no. 9286 published in the Official Gazette dated 22 December 2024, the rate of the withholding on the above-mentioned dividends has been increased from 10% to 15%.

While according to the provisions of Corporate Tax Law, no. 5520, exemption shall be applied for 75% of the earnings from the sale of the properties and participation shares that corporations have kept among their assets for at least two full years (provided that they are added in the capital or kept in a special fund account in liabilities for five years as provided in the Law), and from the sales of founders' shares, preference shares and preferred rights they have kept for same duration; Article 89/a of the Law, no. 7061 effective upon promulgation in the Official Gazette, no. 30261, dated 5 December 2017 and Articles 5.1.e and 5.1.f of Corporate Tax Law have been amended, the exemption applied as 75% was decreased to 50% to be effective as of the promulgation of the Law for the above mentioned sale of properties. In accordance with the Law numbered 7456 which is published dated of 15 July 2023, the tax exemption on profits from the sales of immovables has been terminated as of 15 July 2023, and immovables that were a part of company's assets before the this date, the exemption rate on profits arising from their sales has been set as 25%.

In article (e) of paragraph 1 of the Article 5 of the Corporate Tax Law; 75% of the gains generated from the sale of participation shares retained by corporations in their assets for at least two years and founders' shares, redeemed shares and preemptive rights held for the same period, was considered as exempt from corporate tax.

With Article 22 of Law No. 7394, this provision is within the scope of subparagraph (a) of paragraph 1 of Article 5 of the KVK (subsidiary earnings exception); a law was added stating that 75% of the profits arising from the sale of participation shares of investment funds, which constitute the source of exemption earnings, are exempt from corporate tax. This regulation entered into force on April 15, 2022.

Based on the authority in the 2nd paragraph of the same article, the above exemption rate was reduced from 75% to 50% with the Presidential Decision No. 9160 published in the Official Gazette dated 27 November 2024.

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XVIII. Explanations on taxation (continued)

In article (e) of paragraph 1 of the Article 5 of the Corporate Tax Law; 50% of the gains generated from the sale of participation shares retained by corporations in their assets for at least two years and founders' shares, redeemed shares and preemptive rights held for the same period, will be considered as exempt from corporate tax.

According to the Corporate Tax Law, financial losses can be carried forward to offset against corporate tax base of the related period for up to five years. Tax authorities inspect tax returns and the related accounting records within five years and check the tax calculations.

Corporate tax is required to be filed by the last day of the fourth month following the balance sheet date and taxes must be paid in one installment by the end of the fourth month. Pursuant to the tax legislation, an advance tax is calculated and paid based on earnings generated for each quarter. The amounts thus paid are deducted from the tax calculated over annual earning. Current year tax amounts to be paid are netted off as they are related with prepaid tax amounts.

As of 31 December 2023, the conditions sought for inflation adjustment in the calculation of corporate tax have been fulfilled, within the framework of the repeated provision of Article 298 of the Tax Procedure Law. These conditions are both the exceed in the increase of Producer Price Index in the last 3 accounting periods including current period by 100% and the exceed in the increase in the current period by 10%. However, temporary article 33 has been added on the Tax Procedure Law no. 213 with the regulation made with the "Tax Procedure Law and the Law on Change in Corporate Tax Law" no. 7352 published in the Official Gazette no.31734 dated 29 January 2022 and the application of inflation adjustment in the calculation of corporate tax was postponed to 2023. According to this, the financial statements for the 2021 and 2022 accounting periods, including the provisional tax periods, will not be subject to inflation adjustment, and for the 2023 accounting period; will not be subject to inflation adjustment as of the provisional tax periods, and the financial statements dated 31 December 2023 will be subject to inflation adjustment regardless of whether the inflation adjustment conditions are met or not. Profit/loss difference arising from inflation adjustment in the financial statements will be shown in previous years' profit/loss accounts and will not affect the corporate tax base. According to Article 17 of the Law No. 7491 on Amendments to Certain Laws and Decree Laws published in the Official Gazette No. 32413 dated 28 December 2023, it has become law that monetary gain/loss differences arising from the inflation adjustment to be made in the 2024 and 2025 accounting periods, including the provisional tax periods, do not be taken into account in determining the income of banks, companies within the scope of the Financial Leasing, Factoring, Financing and Savings Financing Companies Law No. 6361 dated 21 November 2012, payment and electronic money institutions, authorized foreign exchange institutions, asset management companies, capital market institutions, insurance and reinsurance companies and pension companies.

The procedures and principles of the articles of law that allow the revaluation of immovable and depreciable economic assets have been rearranged on the Communiqué Amending the General Communiqué on Tax Procedure Law no. 547 (no. 537) published in the Official Gazette dated 14 January 2023 and numbered 32073. Accordingly, the Bank will be able to revalue its immovable and depreciable economic assets in the balance sheet, provided that the conditions in the Provisional Article 32 and Repeated Article 298/ç of the Tax Procedure Law are met. Thus, corporate tax will be calculated and paid according to the values of immovable and depreciable economic assets after revaluation. In this context, as of the end of the 2022 accounting period, the economic assets registered in the Bank's assets were revalued within the scope of Provisional Article 32 and Repeated Article 298/ç of the Tax Procedure Law.

b. Deferred tax

The Bank calculates and accounts for deferred income taxes for all temporary differences arising between the tax bases of assets and liabilities and their carrying amounts in these financial statements in accordance with "Turkish Accounting Standard for Income Taxes" ("TAS 12"). In the deferred tax calculation, the enacted tax rate, in accordance with the tax legislation, is used as of the balance sheet date. In accordance with the Law no. 7456 published in the Official Gazette no. 32249 and dated 15 July 2023, the corporate tax rate has been applied as 30%. As of 31 December 2024, the Bank has calculated deferred tax at the rates of 30% for assets and liabilities.

According to the Provisional Article 33 of the Tax Procedure Law, in the financial statements dated 31 December 2024, the tax effects arising from the subject of inflation correction of the corporate tax are included in the deferred tax calculation.

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XVIII. Explanations on taxation (continued)

If transactions and events are recorded in the statement of profit or loss, then the related tax effects are also recognized in the statement of profit or loss. However, if transactions and events are recorded directly in the shareholders' equity, the related tax effects are also recognized directly in the shareholders' equity.

The calculated deferred tax assets and liabilities are reported as net in the financial statements.

The carrying amount of a deferred tax asset is reviewed at the end of each reporting period. An entity shall reduce the carrying amount of a deferred tax asset to the extent that it is no longer probable that sufficient taxable profit will be available to allow the benefit of part or all of deferred tax asset to be utilized.

c. Transfer pricing

The article no.13 of the Corporate Tax Law describes the issue of transfer pricing under the title of "Disguised Profit Distribution" by way of transfer pricing. "The General Communiqué on Disguised Profit Distribution by way of Transfer Pricing" published on 18 November 2007 explains the application related issues in detail. According to this Communiqué, if the taxpayers conduct transactions like purchase and sale of goods or services with the related parties where the prices are not determined according to the arm's length principle, then it will be concluded that there is a disguised profit distribution by way of transfer pricing. Such disguised profit distributions will not be deducted from the corporate tax base for tax purposes. Disguised profit distribution amount will be recognized as share in net profit and stoppage tax will be calculated depending on whether the profit distributing institution is a real or corporate entity, full-fledged or foreign based taxpayer, is subject to or exempt from tax.

As discussed under subject Communiqué's "Transfer Pricing, Controlled Foreign Entities and Thin Capitalization Form" section, taxpayers are required to fill out the "Transfer Pricing, Controlled Foreign Entities and Thin Capitalization Form" for the purchase and sale of goods or services conducted with their related parties in a taxation period, attach these forms to their corporate tax returns and submit to the tax offices.

XIX. Explanations on borrowings

The Bank, whenever required, generates funds from domestic and foreign sources in the form of borrowings, syndications, securitizations, and bill and bond issuances in the local and international markets. The funds borrowed are recorded at their purchase costs and valued at amortised costs using the effective interest method.

XX. Explanation on issuance of equity securities

There are no issuance of equity securities in 2024.

XXI. Explanations on guarantees and acceptances

The Bank's letters of acceptances with its customers are simultaneously realized with customers' payments and are followed in off-balance sheet items.

XXII. Explanations on government incentives

As of the balance sheet date, there is no government grant for the Bank.

XXIII. Explanations on segment reporting

An operating segment is a component of an entity:

- That engages in business activities from which it may earn revenues and incur expenses (including revenues and expenses relating to transactions with other components of the same entity),
- Whose operating results are regularly reviewed by the entity's authorised decision maker for the purpose of taking decisions about resources to be allocated to the segment and assessing its performance and
- For which discrete financial information is available.

Reporting according to the operational segment is presented in Note XII of Section Four.

XXIV. Profit reserves and distribution of profit

Under the Turkish Commercial Code ("TCC"), legal reserves consist of first legal reserve and second legal reserve. First legal reserve, appropriated at the rate of 5%, until the total reserve is equal to 20% of issued and fully paid-in share capital. Second legal reserve, appropriated at the rate of at least 10% of distributions in excess of 5% of issued and fully paid-in share capital.

XXV. Explanations on other disclosures

None.

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Section four

Information on financial position and risk management

I. Explanations on unconsolidated capital

Unconsolidated total capital and capital adequacy ratio has been calculated in accordance with the "Regulation on Equity of Banks" and "Regulation on Measurement and Assessment of Capital Adequacy of Banks".

Within the scope of the measures announced by the Banking Regulation and Supervision Agency on 12 December 2023 the amount subject to credit risk shall be calculated by using the 26 June 2023 dated Central Bank's foreign exchange buying rates and negative revaluation differences of the securities classified under financial assets measured at fair value through other comprehensive income are not included in capital calculation, it has been decided to continue to apply the existing provisions of the per Regulation for "Securities at Fair Value through Other Comprehensive Income" acquired after 1 January 2024.

As of 31 December 2024, according to Banking Regulation and Supervision Agency 12 December 2023 dated decision the amount subject to credit risk in calculating the regulatory capital adequacy ratio was calculated by taking into account the above mentioned regulatory changes. In addition, in accordance with the Banking Regulation and Supervision Board's Decision dated 16 April 2020 and numbered 8999, 0% risk weight is used in the calculation of the amount subject to credit risk for FX receivables of Banks which are from Republic of Turkey Central Management within the scope of Regulation on Measurement and Assessment of Capital Adequacy of Banks published on the Official Gazette dated 23 October 2015 and numbered 29511. If the specified measure is not taken into account, the unconsolidated capital adequacy ratio decreases to 19.94 % as of 31 December 2024.

As of 31 December 2024, taking into consideration the above-mentioned regulations, the Bank's total capital is TL 23,449,390 and the capital adequacy ratio is 22.48%. As of 31 December 2023, the Bank's total capital amounted to TL 14,066,758 and capital adequacy ratio was 16.04%.

(Convenience translation of the unconsolidated financial statements and related disclosures originally issued in Turkish)

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I. Explanations on unconsolidated capital (continued)

	Current period	Prior period
COMMON EQUITY Tier I Capital		
Paid-in capital to be entitled for compensation after all creditors	3,486,268	3,486,268
Share premium	-	-
Legal reserves	11,367,094	9,494,742
Other comprehensive income according to TAS	3,189,340	798,221
Profit	2,235,135	1,698,038
Net profit for the period	2,235,135	1,698,038
Prior period profit	-	-
Bonus shares from investments in associates, subsidiaries and joint ventures that are not recognized in profit	15,411	1,797
Common equity Tier I capital before deductions	20,293,248	15,479,066
Deductions from common equity		
Valuation adjustments calculated as per the article 9. (i) of the Regulation on the Capital of Banks	-	-
Portion of the current and prior periods' losses not covered by reserves and losses accounted under equity as per TAS	113,276	634,910
Leasehold improvements on operational leases	53,463	64,874
Goodwill netted off deferred tax liability	-	-
Other intangibles netted off deferred tax liability except for mortgage servicing rights	2,292,478	1,023,361
Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability)	-	-
Differences not recognized at the fair value of assets and liabilities subject to hedge of cash flow risk	-	-
Portion of the total expected loss amount calculated as per Communiqué on Calculation of Credit Risk with the Internal Rating Based Approach, which exceeds total provisions	-	-
Gains arising from securitization transactions	-	-
Unrealized gains and losses due to changes in own credit risk on fair value of Bank's liabilities	-	-
Net amount of defined-benefit plan assets	-	-
Direct and indirect investments of the Bank in its own Common Equity Tier I Capital	-	-
Shares obtained contrary to the 4 th clause of the 56 th Article of the Law	-	-
Portion of the total of net long positions of investments made in equity items of banks and financial institutions outside the scope of consolidation where the Bank owns 10% or less of the issued common share capital, which exceeds 10% of common equity of the Bank	-	-
Portion of the total of net long positions of investments made in equity items of banks and financial institutions outside the scope of consolidation where the Bank owns 10% or more of the issued common share capital, which exceeds 10% of common equity of the Bank	-	-
Portion of mortgage servicing rights exceeding 10% of the common equity	-	-
Portion of deferred tax assets based on temporary differences exceeding 10% of the common equity	400,411	531,880
Amounts exceeding 15% of the common equity as per the 2 nd clause of the provisional article 2 of the Regulation on the Equity of Banks	-	-
Excess amount arising from the net long positions of investments in common equity items of banks and financial institutions outside the scope of consolidation where the Bank owns 10% or more of the issued common share capital	-	-
Excess amount arising from mortgage servicing rights	-	-
Excess amount arising from deferred tax assets based on temporary differences	-	-
Other items to be defined by the BRSA	-	-
Deductions to be made from common equity in case adequate additional Tier I capital or Tier II capital is not available	-	-
Total deductions from common equity Tier I capital	2,859,628	2,255,025
Total common equity Tier I capital	17,433,620	13,224,041
ADDITIONAL TIER I CAPITAL		
Preferred stock not included in common equity tier I capital and the related share premiums	-	-
Debt instruments and premiums approved by BRSA	-	-
Debt instruments and premiums approved by BRSA (in scope of Temporary Article 4)	-	-
Additional Tier I capital before deductions	-	-
Deductions from additional Tier I capital		
Bank's direct and indirect investments in its own Additional Tier I capital	-	-
Investments in equity instruments issued by banks and financial institutions that have invested in Bank's additional Tier I Capital, which are compatible with Article 7 of the regulation	-	-
Portion of total Net Long Positions of the Investments in Equity Items of Unconsolidated Banks and Financial Institutions where the Bank Owns 10% or less of the Issued Share Capital, which Exceeds 10% of Bank's Tier I Capital	-	-
The Total of Net Long Positions of the Direct or Indirect Investments in Additional Tier I Capital of Unconsolidated Banks and Financial Institutions where the Bank Owns more than 10% of the Issued Share Capital	-	-
Other items to be defined by the BRSA	-	-
Items continuing to be deducted from Tier I Capital during the Transition Period	-	-
Portion of the goodwill and other intangible assets and related deferred tax liabilities which will not be deducted from Common Equity Tier I capital as per the first sub-paragraph of the Provisional Article 2 of the Regulation on the Equity of Banks (-)	-	-
Portion of the net deferred tax asset/liability not deducted from Common Equity Tier I capital as per the first sub-paragraph of the Provisional Article 2 of the Regulation on the Equity of Banks (-)	-	-
Deductions to be made from common equity in case adequate Additional Tier I Capital or Tier II Capital is not available (-)	-	-
Total deductions from additional Tier I capital	-	-
Total additional Tier I capital	-	-
Total Tier I capital (Tier I Capital = Common Equity + Additional Tier I Capital)	17,433,620	13,224,041

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I. Explanations on unconsolidated capital (continued)

	Current period	Prior period
TIER II CAPITAL		
Bank's borrowing instruments and issue premiums	5,304,261	-
Bank's borrowing instruments and issue premiums (in scope of Temporary Article 4)	-	-
Provisions (amounts stated in Article 8 of the Regulation on the Equity of Banks)	713,147	846,006
Tier II Capital Before Deductions	6,017,408	846,006
Deductions From Tier II Capital		
Bank's direct and indirect investments in its own Tier II Capital (-)	-	-
Bank's investments in equity instruments issued by banks and financial institutions that have invested in Bank's additional Tier I Capital, which are compatible with Article 8 of the regulation	-	-
Portion of total Net Long Positions of the Investments in Equity Items of Unconsolidated Banks and Financial Institutions where the Bank Owns 10% or less of the Issued Share Capital, which Exceeds 10% of Bank's Tier I Capital (-)	-	-
The Total of Net Long Positions of the Direct or Indirect Investments in Additional Tier I Capital of Unconsolidated Banks and Financial Institutions where the Bank Owns more than 10% of the Issued Share Capital	-	-
Other items to be defined by the BRSA (-)	-	-
Total Deductions from Tier II Capital	-	-
Total Tier II Capital	6,017,408	846,006
Total capital (the sum of tier i capital and tier ii capital)	23,451,028	14,070,047
Total of core capital and additional capital (total equities)		
Loans granted against Article 50 and 51 of Banking Law	-	-
Net Book Values of Movables and Immovables Exceeding the Limit Defined in Article 57, Clause 1 of the Banking Law and of Assets Acquired against Overdue Receivables and Held for Sale but Retained more than Three Years	-	-
Other items to be defined by the BRSA (-)	1,638	3,289
Items to be deducted from the sum of Tier I and Tier II Capital (Capital) during transition period		
Portion of total Net Long Positions of the Investments in Equity Items of Unconsolidated Banks and Financial Institutions where the Bank Owns 10% or less of the Issued Share Capital, exceeding 10% of Bank's Tier I Capital, which is not deducted from Tier I, Tier II and additional capital as per Temporary Article 2 of the Regulation on the Equity of Banks	-	-
Portion of total Net Long Positions of the Investments in Equity Items of Unconsolidated Banks and Financial Institutions where the Bank Owns 10% or less of the Issued Share Capital, exceeding 10% of Bank's Tier I Capital, which is not deducted from the tier II capital and additional capital as per Temporary Article 2 of the Regulation on the Equity of Banks (-)	-	-
Portion of the total of net long positions of investments made in the common equity items of banks and financial institutions outside the scope of consolidation where the bank owns 10% or more of the issued common share capital, deferred tax assets based on temporary differences and mortgage servicing rights not deducted from Common Equity as per paragraph 1 and 2 of Provisional Article 2 of the Regulation on the Equity of Banks (-)	-	-
TOTAL CAPITAL		
Total Capital	23,449,390	14,066,758
Total risk weighted amounts	104,304,296	87,708,946
CAPITAL ADEQUACY RATIOS		
Core Capital Adequacy Ratio (%)	16.71	15.08
Tier I Capital Adequacy Ratio (%)	16.71	15.08
Capital Adequacy Ratio (%)	22.48	16.04
BUFFERS		
Total buffer requirement	2.59	2.66
Capital protection buffer requirement (%)	2.50	2.50
Bank specific cyclical buffer requirement (%)	0.09	0.16
Systemically important banks buffer ratio (%)	-	-
The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%)	10.71	8.04
Amounts below the Excess Limits as per the Deduction Principles		
Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or less of the issued share capital	-	-
Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital	-	-
Mortgage Servicing Rights	-	-
Amount arising from deferred tax assets based on temporary differences	1,783,403	1,907,472
Limits related to provisions considered in Tier II calculation		
General provisions for standard based receivables (before ten thousand twenty five limitation)	713,147	846,006
Up to 1.25% of total risk-weighted amount of general reserves for receivables where the standard approach used	713,147	846,006
Amount of total provision exceeding the total expected loss amount calculated according to the Communiqué on the Calculation of the Credit Risk Based Amount as per the Internal Ratings Based Approach	-	-
Amount up to 0.6% of the portion of total provision exceeding the total expected loss amount calculated according to the Communiqué on the Calculation of the Credit Risk Based Amount as per the Internal Ratings Based Approach	-	-
Debt instruments subject to Temporary Article 4 (to be implemented between 1 January 2018 and 1 January 2022)		
Upper limit for Additional Tier I Capital subject to Temporary Article 4	-	-
Amounts exceeding the upper limits of Additional Tier I Capital subject to Temporary Article 4	-	-
Upper limit for Additional Tier II Capital subject to temporary Article 4	-	-
Amounts exceeding the upper limits of Additional Tier II Capital subject to temporary Article 4	-	-

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I. Explanations on unconsolidated capital (continued)

Information about debt instruments that will be included in total capital calculation

Issuer	ING Bank A.Ş.
Identifier (CUSIP, ISIN etc.)	XS2836961032
Governing law (s) of the instrument	Debt Instrument Communiqué numbered CMB- VII- 128.8 BRSA regulation on bank's shareholder equity BRSA Communiqué on Principles Regarding Debt Securities to be Included in the Calculation of Banks' Equity
Regulatory treatment	
Subject to 10% deduction as of 1/1/2015	No
Eligible on unconsolidated and /or consolidated basis	Consolidated and Unconsolidated
Instrument type	The bond to be included in the contribution capital calculation
Amount recognized in regulatory capital (as of reporting date)	150 million USD (5,304 million TL)
Nominal value of instrument	150 million USD (5,304 million TL)
Accounting classification of the instrument	Subordinated Debt Instrument (Bond)
Issuance date of instrument	24 September 2024
Maturity structure of the instrument (demand/time)	Time
Original maturity of the instrument	24 December 2034
Issuer call subject to prior supervisory (BRSA) approval	Yes
Optional call date, contingent call dates and redemption amount	24 December 2029 - 150 million USD
Subsequent call dates, if applicable	24 December 2029 later
Interest/dividend payment	
Fixed or floating coupon/dividend payments	Fixed
Coupon rate and any related index	8.50%
Existence of any dividend payment restriction	-
Fully discretionary, partially discretionary or mandatory	-
Existence of step up or other incentive to redeem	None
Noncumulative or cumulative	-
Convertible or non-convertible into equity shares	
If convertible, conversion trigger (s)	-
If convertible, fully or partially	-
If convertible, conversion rate	-
If convertible, mandatory or optional conversion	-
If convertible, type of instrument convertible into	-
If convertible, issuer of instrument to be converted into	-
Write-down feature	
If bonds can be written-down, write-down trigger(s)	Due to the losses incurred, where the Bank is at the point at which the BRSA may determine pursuant to Article 71 of the Banking Law that: (i) its operating license is to be revoked and the Bank is liquidated or (ii) the rights of all of its shareholders (except to dividends), and the management and supervision of the Bank, are to be transferred to the SDIF on the condition that losses are deducted from the capital of existing shareholders (occurrence of either condition means the issuer has become non-viable), or it is probable that the Issuer will become non-viable; then the bonds can be written-down
If bond can be written-down, full or partial	Partially or fully
If bond can be written-down, permanent or temporary	Continuously
If temporary write-down, description of write-up mechanism	There are no any temporary write-up mechanisms
Position in subordination hierarchy in case of liquidation (instrument type immediately senior to the instrument)	In priority of receivables, it comes after the senior obligations of the Issuer
In compliance with article number 7 and 8 of Regulation on Bank Capital	Instrument is in compliant with Article 8 of the Regulation on Bank Capital
Details of incompliance with article number 7 and 8 of Regulation on Bank Capital	Instrument is not in compliant with Article 7 of the Regulation on Bank Capital

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I. Explanations on unconsolidated capital (continued)

Explanations on reconciliation of capital items to balance sheet

Risk classifications	Carrying amount	Amounts in equity calculation
Shareholders' equity	20,031,208	20,031,208
Gains from cash flow hedge transactions	127,921	(127,921)
Leasehold improvements on operational leases	53,463	(53,463)
Goodwill and intangible assets	2,329,478	(2,292,478)
General provision	713,147	713,147
Subordinated debt instruments	5,128,095	5,304,261
Other deductions from shareholders' equity	1,638	(1,638)
Deductions from Common Equity Tier 1 Capital as per the Regulation	-	(400,411)
Accumulated revaluation and/or reclassification gains/losses of financial assets at fair value through other comprehensive income	297,697	276,685
Capital		23,449,390

II. Explanations on unconsolidated credit risk

- The Bank's credit risk management strategy consists of limit settings within legal limitations, conservative credit allocation structure, proper documentation structure in line with the standards and strong monitoring and follow-up systems. Risk management strategy also includes sector-specific, country, currency and customer diversification. With the credit evaluations and monthly reporting to the top level management, loans having high exposures and factors that may cause deterioration in the loan quality are closely monitored, preventing the credit quality to decrease. Additionally, various analysis about concentration risks is made for monitoring portfolio risk as well as within the scope of Internal Capital Adequacy Assessment Process ("ICAAP") and these activities are supported by stress tests. The sectoral distributions of loans are reported monthly and can be limited according to the conjunctions. However, geographical limitation is not implemented. Risk management strategy document, which explains the risk management strategy and the important risk management factors affecting it, is revised at least once a year under the supervision of the Risk Committee.

As prescribed in the related legislation, the credit worthiness of the debtors is monitored regularly. The credit limits are determined by the Board of Directors, the Bank's Credit Committee and other related credit departments. The account statements related to given loans are obtained and reviewed as prescribed in the legislation. The Bank receives sufficient collateral for the loans given and other receivables. The received collaterals comprise of personal and legal entity guarantees, pledge of vehicle, mortgages, cash blockage, customer checks and Credit Guarantee Fund suretyship having Treasury guarantee.

Loans that have overdue principal, interest or both for less than 90 days after the maturity or due date are considered past due loans by the Bank. Loans that have overdue principal, interest or both for more than 90 days after the maturity or due date or the debtors of which are deemed unworthy by the Bank are considered impaired loans.

The Bank has started to apply TFRS 9 Financial Instruments ("TFRS 9") published by POA in the accompanying financial statements starting from 1 January 2018, in accordance with the "Regulation on the Procedures and Principles Regarding the Classification of Loans and Provisions for These". The Bank calculates the expected loss provision according to TFRS 9.

The sum of risk exposures that are offset and for which credit risk mitigation is not applied are presented monthly to the Audit Committee per different risk categories and types and monthly, periodically and annual changes are monitored by the senior management.

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II. Explanations on unconsolidated credit risk (continued)

Risk classifications	Current period risk amount (*)	Current period average (**)	Prior period risk amount (*)	Prior period average (**)
Conditional and unconditional receivables from central governments and Central Banks	71,527,472	54,865,678	38,585,840	32,412,074
Conditional and unconditional receivables from regional or local governments	3,700,781	1,370,830	754,191	695,856
Conditional and unconditional receivables from administrative bodies and non-commercial enterprises	-	-	-	-
Conditional and unconditional receivables from multilateral development banks	-	-	-	-
Conditional and unconditional receivables from international organizations	-	-	-	-
Conditional and unconditional receivables from banks and brokerage houses	7,412,279	12,356,057	18,299,744	19,276,972
Conditional and unconditional receivables from corporates	58,650,479	54,451,608	49,481,445	48,474,994
Conditional and unconditional receivables from retail portfolios	18,560,128	12,306,949	11,240,237	11,262,258
Conditional and unconditional receivables secured by mortgages	4,311,910	4,075,946	2,137,701	2,268,550
Past due receivables	312,312	269,149	243,994	299,073
Receivables defined under high risk category by BRSA	8,280,842	11,031,741	10,148,244	10,099,664
Securities collateralized by mortgages	-	-	-	-
Securitization positions	-	-	-	-
Short-term receivables from banks, brokerage houses and corporates	-	-	-	-
Investments similar to collective investment funds	-	-	-	-
Stock transactions	2,501,428	2,212,601	1,585,618	1,263,634
Other receivables	8,783,717	8,799,032	5,435,139	7,146,142
Total	184,041,348	161,739,591	137,912,153	133,199,217

(*) The figures represent total risk amounts before credit risk mitigation and after credit conversion factor.

(**) The average risk amount was calculated by taking the arithmetic average of the values in the monthly reports prepared in balance sheet period in regards to "Regulation on Measurement and Assessment of Capital Adequacy Ratios of Banks".

- Control limits exist on forward and option agreements and other similar agreements. The undertaken credit risk of these types of instruments is managed together with market risk.
- Related to forward transactions, options and similar agreements, international counterparties (financial institutions) the bank operates the daily collateral management policies in accordance with ISDA agreements (CSA) and where needed the credit exposure is reduced by the usage of rights and performing of the acts.
- Non-cash loans turned into cash loans are included in the same risk group as overdue cash loans which are not collected upon maturity.

When there is an issue or it is evaluated that the company might have an issue on repayments of the loan that are given in Corporate, Commercial, SME Banking segments, such companies have been transferred to Credits Restructuring and Recovery Group. The rating of all companies that were transferred to Credits Restructuring and Recovery Group have been reassessed. As a rule, the rating of the company has been reduced at the time of transfer, company's restructuring decision has been reconsidered and after decision is made the monitoring methods in the legislation have been applied. Existing ratings of the companies that are in legal follow up and are not restructured have been reduced again. On the other hand, companies that have issues on their financial positions or business operations but not restructured, have been monitored closely in terms of company operations and cash flows.

The Bank considers that long-term commitments are more exposed to credit risk than short-term commitments, and risk decomposition has been made according to that.

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II. Explanations on unconsolidated credit risk (continued)

5. Transactions in foreign countries have been made with many correspondent banks in many countries. The counterparty limits have been set for the risks that may arise in transactions with banks. Credit risks have been managed according to credit worthiness and limits of the counterparties.

The Bank does not have any material credit risk concentration as an active participant of international banking market when considered with financial operations of other financial institutions.

6. The proportion of the Bank's top 100 and 200 cash loan balances in total cash loans is 43% and 52% respectively (31 December 2023: 49% and 59%).

The proportion of the Bank's top 100 and 200 customers' non-cash loan balances in total non-cash loans is 86% and 94% (31 December 2023: 88% and 94%).

The proportion of the Bank's top 100 and 200 customers' cash and non-cash loan balances in total cash and non-cash loans 52% and 60% (31 December 2023: 56% and 65%).

7. Stage 1 and Stage 2 expected losses for unconsolidated credit risk amount to TL 713,147 (31 December 2023: TL 846,006).

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(Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

II. Explanations on unconsolidated credit risk (continued)

8. Amount of profile on significant risks in significant regions

Profile on significant risks in significant regions (*)

	Risk categories (**)																	Total
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	
Current period																		
Domestic	71,527,472	3,700,781	-	-	-	1,228,716	58,650,388	18,554,734	4,311,782	312,309	8,280,836	-	-	-	-	1,189,884	8,783,709	176,540,611
European Union Countries	-	-	-	-	-	4,669,241	91	5,237	128	-	-	-	-	-	-	1,311,544	8	5,986,249
OECD Countries (***)	-	-	-	-	-	1,195,420	-	7	-	-	-	-	-	-	-	-	-	1,195,427
Off- Shore banking regions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
USA, Canada	-	-	-	-	-	174,655	-	-	-	-	-	-	-	-	-	-	-	174,655
Other Countries	-	-	-	-	-	144,247	-	150	-	3	6	-	-	-	-	-	-	144,406
Investment and associates, subsidiaries and joint ventures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Undistributed assets / liabilities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total	71,527,472	3,700,781	-	-	-	7,412,279	58,650,479	18,560,128	4,311,910	312,312	8,280,842	-	-	-	-	2,501,428	8,783,717	184,041,348
	Risk categories (**)																	Total
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	
Prior period																		
Domestic	38,585,840	754,191	-	-	-	9,030,080	49,291,411	11,237,100	2,137,490	243,994	10,148,128	-	-	-	-	830,584	5,435,133	127,693,951
European Union Countries	-	-	-	-	-	7,511,676	190,034	2,996	211	-	-	-	-	-	-	755,034	6	8,459,957
OECD Countries (***)	-	-	-	-	-	882,941	-	-	-	-	32	-	-	-	-	-	-	882,973
Off- Shore banking regions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
USA, Canada	-	-	-	-	-	872,749	-	-	-	-	-	-	-	-	-	-	-	872,749
Other Countries	-	-	-	-	-	2,298	-	141	-	-	84	-	-	-	-	-	-	2,523
Investment in associates, subsidiaries and joint ventures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Undistributed assets / liabilities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total	38,585,840	754,191	-	-	-	18,299,744	49,481,445	11,240,237	2,137,701	243,994	10,148,244	-	-	-	-	1,585,618	5,435,139	137,912,153

- (*) The figures represent total risk amounts before credit risk mitigation and after credit conversion factor
- (**) Risk categories that are defined in "Communiqué on Measurement and Assessment of Capital Adequacy of Banks"
- (***) EU countries, OECD countries other than USA and Canada
- 1- Conditional and unconditional receivables from central governments and Central Banks
- 2- Conditional and unconditional receivables from regional or local governments
- 3- Conditional and unconditional receivables from administrative bodies and non-commercial enterprises
- 4- Conditional and unconditional receivables from multilateral development banks
- 5- Conditional and unconditional receivables from international organizations
- 6- Conditional and unconditional receivables from banks and brokerage houses
- 7- Conditional and unconditional receivables from corporates
- 8- Conditional and unconditional receivables from retail portfolios
- 9- Conditional and unconditional receivables secured by mortgages
- 10- Past due receivables
- 11- Receivables defined under high risk category by BRSA
- 12- Securities collateralized by mortgages
- 13- Securitization positions
- 14- Short-term receivables from banks, brokerage houses and corporates
- 15- Investments similar to collective investment funds
- 16- Stock transactions
- 17- Other receivables

(Convenience translation of the unconsolidated financial statements and related disclosures originally issued in Turkish)

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II. Explanations on unconsolidated credit risk (continued)

9. Risk profile according to sectors and counterparties (*)

Current period	Risk categories (**)																	TL	FC	Total
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17			
Agriculture	-	-	-	-	-	-	691,009	63,649	-	1,564	-	-	-	-	-	-	4	138,401	617,825	756,226
Farming and raising livestock	-	-	-	-	-	-	191,244	63,616	-	1,144	-	-	-	-	-	-	2	137,901	118,105	256,006
Forestry	-	-	-	-	-	-	9	-	-	50	-	-	-	-	-	-	-	61	-	61
Fishing	-	-	-	-	-	-	499,756	33	-	370	-	-	-	-	-	-	-	439	499,720	500,159
Manufacturing	-	-	-	-	-	-	27,390,733	2,325,325	810,875	83,902	8,858	-	-	-	-	-	603	11,701,202	18,919,094	30,620,296
Mining	-	-	-	-	-	-	684,897	7,397	-	285	-	-	-	-	-	-	11	102,635	589,955	692,590
Production	-	-	-	-	-	-	26,163,013	2,313,038	810,875	83,432	8,858	-	-	-	-	-	590	11,395,075	17,984,731	29,379,806
Electricity, gas, water	-	-	-	-	-	-	542,823	4,890	-	185	-	-	-	-	-	-	2	203,492	344,408	547,900
Construction	-	-	-	-	-	-	4,470,207	172,992	874	68,626	-	-	-	-	-	-	157	2,096,007	2,616,849	4,712,856
Services	51,876,124	-	-	-	-	7,412,279	26,083,945	3,226,995	451,642	93,689	9,337	-	-	-	-	2,499,244	36,766	62,420,775	29,269,246	91,690,021
Wholesale and retail trade	-	-	-	-	-	-	11,882,971	2,211,134	273,331	76,117	8,918	-	-	-	-	-	614	10,546,893	3,906,192	14,453,085
Hotel food, beverage services	-	-	-	-	-	-	584,604	35,566	71,781	5,798	-	-	-	-	-	-	63	350,804	347,008	697,812
Transportation and telecommunication	-	-	-	-	-	-	2,485,218	186,590	104,965	6,498	-	-	-	-	-	-	57	459,273	2,324,055	2,783,328
Financial institutions	51,876,124	-	-	-	-	7,412,279	6,206,464	169,821	-	207	-	-	-	-	-	2,499,244	25,815	48,903,427	19,286,527	68,189,954
Real estate and renting service	-	-	-	-	-	-	1,547,935	60,149	-	882	-	-	-	-	-	-	10,109	218,269	1,400,806	1,619,075
Self-employment service	-	-	-	-	-	-	3,334,087	514,850	1,085	3,832	419	-	-	-	-	-	87	1,849,702	2,004,658	3,854,360
Education services	-	-	-	-	-	-	889	5,653	-	92	-	-	-	-	-	-	9	6,643	-	6,643
Health and social services	-	-	-	-	-	-	41,777	43,232	480	263	-	-	-	-	-	-	12	85,764	-	85,764
Other	19,651,348	3,700,781	-	-	-	-	14,585	12,771,167	3,048,519	64,531	8,262,647	-	-	-	-	2,184	8,746,187	54,320,185	1,941,764	56,261,949
Total	71,527,472	3,700,781	-	-	-	7,412,279	58,650,479	18,560,128	4,311,910	312,312	8,280,842	-	-	-	-	2,501,428	8,783,717	130,676,570	53,364,778	184,041,348

(*) The figures represent total risk amounts before credit risk mitigation and after credit conversion factor.

(**) Stands for the risk categories listed in "Regulation on Measurement and Assessment of Capital Adequacy of Banks.

1- Conditional and unconditional receivables from central governments and Central Banks

2- Conditional and unconditional receivables from regional or local governments

3- Conditional and unconditional receivables from administrative bodies and non-commercial enterprises

4- Conditional and unconditional receivables from multilateral development banks

5- Conditional and unconditional receivables from international organizations

6- Conditional and unconditional receivables from banks and brokerage houses

7- Conditional and unconditional receivables from corporates

8- Conditional and unconditional receivables from retail portfolios

9- Conditional and unconditional receivables secured by mortgages

10- Past due receivables

11- Receivables defined under high risk category by BRSA

12- Securities collateralized by mortgages

13- Securitization positions

14- Short-term receivables from banks, brokerage houses and corporates

15- Investments similar to collective investment funds

16- Stock transactions

17- Other receivables

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II. Explanations on unconsolidated credit risk (continued)

9. Risk profile according to sectors and counterparties (*)

Prior period	Risk categories (**)																	TL	FC	Total
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17			
Agriculture	-	-	-	-	-	-	463,107	59,755	-	3,276	-	-	-	-	-	-	8	232,029	294,117	526,146
Farming and raising livestock	-	-	-	-	-	-	80,242	45,180	-	2,800	-	-	-	-	-	-	6	128,228	-	128,228
Forestry	-	-	-	-	-	-	9	14,200	-	50	-	-	-	-	-	-	2	14,261	-	14,261
Fishing	-	-	-	-	-	-	382,856	375	-	426	-	-	-	-	-	-	-	89,540	294,117	383,657
Manufacturing	-	-	-	-	-	-	26,421,358	2,308,103	504,995	86,314	564	-	-	-	-	-	530	15,141,963	14,179,901	29,321,864
Mining	-	-	-	-	-	-	1,043,776	780	-	168	-	-	-	-	-	-	4	260,464	784,264	1,044,728
Production	-	-	-	-	-	-	24,504,857	2,298,493	504,995	85,969	564	-	-	-	-	-	521	14,751,937	12,643,462	27,395,399
Electricity, gas, water	-	-	-	-	-	-	872,725	8,830	-	177	-	-	-	-	-	-	5	129,562	752,175	881,737
Construction	-	-	-	-	-	-	2,552,987	176,433	9,824	13,619	8,074	-	-	-	-	-	123	1,515,727	1,245,333	2,761,060
Services	22,280,595	-	-	-	-	18,299,744	20,027,121	2,297,667	221,746	102,526	3,640	-	-	-	-	1,584,482	205,171	43,714,885	21,307,807	65,022,692
Wholesale and retail trade	-	-	-	-	-	-	7,809,953	1,935,225	96,426	82,372	3,623	-	-	-	-	-	514	8,083,327	1,844,786	9,928,113
Hotel food, beverage services	-	-	-	-	-	-	192,060	26,878	208	7,668	-	-	-	-	-	-	82	22,669	204,227	226,896
Transportation and telecommunication	-	-	-	-	-	-	1,784,976	163,059	124,865	6,562	-	-	-	-	-	-	61	295,787	1,783,736	2,079,523
Financial institutions	22,280,595	-	-	-	-	18,299,744	7,256,465	26,198	-	204	-	-	-	-	-	1,584,482	194,345	34,608,993	15,033,040	49,642,033
Real estate and renting service	-	-	-	-	-	-	792,568	54,673	-	745	-	-	-	-	-	-	10,094	182,323	675,757	858,080
Self-employment service	-	-	-	-	-	-	1,861,185	81,267	7	4,195	17	-	-	-	-	-	57	442,637	1,504,091	1,946,728
Education services	-	-	-	-	-	-	2,588	-	-	189	-	-	-	-	-	-	7	2,784	-	2,784
Health and social services	-	-	-	-	-	-	327,326	10,367	240	591	-	-	-	-	-	-	11	76,365	262,170	338,535
Other	16,305,245	754,191	-	-	-	-	16,872	6,398,279	1,401,136	38,259	10,135,966	-	-	-	-	1,136	5,229,307	38,712,789	1,567,602	40,280,391
Total	38,585,840	754,191	-	-	-	18,299,744	49,481,445	11,240,237	2,137,701	243,994	10,148,244	-	-	-	-	1,585,618	5,435,139	99,317,393	38,594,760	137,912,153

(*) The figures represent total risk amounts before credit risk mitigation and after credit conversion factor.

(**) Stands for the risk categories listed in "Regulation on Measurement and Assessment of Capital Adequacy of Banks.

18- Conditional and unconditional receivables from central governments and Central Banks

19- Conditional and unconditional receivables from regional or local governments

20- Conditional and unconditional receivables from administrative bodies and non-commercial enterprises

21- Conditional and unconditional receivables from multilateral development banks

22- Conditional and unconditional receivables from international organizations

23- Conditional and unconditional receivables from banks and brokerage houses

24- Conditional and unconditional receivables from corporates

25- Conditional and unconditional receivables from retail portfolios

26- Conditional and unconditional receivables secured by mortgages

27- Past due receivables

28- Receivables defined under high risk category by BRSA

29- Securities collateralized by mortgages

30- Securitization positions

31- Short-term receivables from banks, brokerage houses and corporates

32- Investments similar to collective investment funds

33- Stock transactions

34- Other receivables

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II. Explanations on unconsolidated credit risk (continued)

10. Term distribution of risks with term structure (*)

Current period	Time to maturity							
Risk categories	1 month	1-3 months	3-6 months	6-12 months	Over 1 year	Demand	Total	
Credit risk weighted assets								
Conditional and unconditional receivables from central governments and Central Banks	51,877,345	-	-	-	17,907,115	1,743,012	71,527,472	
Conditional and unconditional receivables from regional or local governments	-	68,091	13,240	-	3,619,450	-	3,700,781	
Conditional and unconditional receivables from administrative bodies and non-commercial enterprises	-	-	-	-	-	-	-	
Conditional and unconditional receivables from multilateral development banks	-	-	-	-	-	-	-	
Conditional and unconditional receivables from international organizations	-	-	-	-	-	-	-	
Conditional and unconditional receivables from banks and brokerage houses	1,632,377	239,308	437,567	940,499	2,846,937	1,315,591	7,412,279	
Conditional and unconditional receivables from corporates	1,717,411	5,673,149	3,994,305	12,060,711	18,946,985	16,257,918	58,650,479	
Conditional and unconditional receivables from retail portfolios	649,069	1,319,759	1,399,034	5,447,385	8,880,306	864,575	18,560,128	
Conditional and unconditional receivables secured by mortgages	44,247	50,006	62,259	134,857	3,714,753	305,788	4,311,910	
Past due receivables	-	-	-	-	-	312,312	312,312	
Receivables defined under high risk category by BRSA	54,708	424,401	1,179,820	2,931,825	3,671,191	18,897	8,280,842	
Securities collateralized by mortgages	-	-	-	-	-	-	-	
Securitization positions	-	-	-	-	-	-	-	
Short-term receivables from banks, brokerage houses and corporates	-	-	-	-	-	-	-	
Investments similar to collective investment funds	-	-	-	-	-	-	-	
Stock transactions	-	-	-	-	-	2,501,428	2,501,428	
Other receivables	-	-	-	-	-	8,783,717	8,783,717	
Total	55,975,157	7,774,714	7,086,225	21,515,277	59,586,737	32,103,238	184,041,348	

(*) The figures represent total risk amounts before credit risk mitigation and after credit conversion factor.

Prior Period	Time to maturity							
Risk categories	1 month	1-3 months	3-6 months	6-12 months	Over 1 year	Demand	Total	
Credit risk weighted assets								
Conditional and unconditional receivables from central governments and Central Banks	21,963,745	316,470	-	678,604	13,039,430	2,587,591	38,585,840	
Conditional and unconditional receivables from regional or local governments	-	203,805	-	221,063	329,323	-	754,191	
Conditional and unconditional receivables from administrative bodies and non-commercial enterprises	-	-	-	-	-	-	-	
Conditional and unconditional receivables from multilateral development banks	-	-	-	-	-	-	-	
Conditional and unconditional receivables from international organizations	-	-	-	-	-	-	-	
Conditional and unconditional receivables from banks and brokerage houses	9,279,306	1,276,274	1,208,593	2,350,060	3,316,180	869,331	18,299,744	
Conditional and unconditional receivables from corporates	4,696,920	4,456,347	5,319,917	7,191,747	9,937,846	17,878,668	49,481,445	
Conditional and unconditional receivables from retail portfolios	694,715	596,574	1,271,623	2,243,702	5,480,796	952,827	11,240,237	
Conditional and unconditional receivables secured by mortgages	14,843	23,672	40,329	165,579	1,656,887	236,391	2,137,701	
Past due receivables	-	-	-	-	-	243,994	243,994	
Receivables defined under high risk category by BRSA	9,906	678,694	1,124,123	3,536,645	4,786,262	12,614	10,148,244	
Securities collateralized by mortgages	-	-	-	-	-	-	-	
Securitization positions	-	-	-	-	-	-	-	
Short-term receivables from banks, brokerage houses and corporates	-	-	-	-	-	-	-	
Investments similar to collective investment funds	-	-	-	-	-	-	-	
Stock transactions	-	-	-	-	-	1,585,618	1,585,618	
Other receivables	-	-	-	-	-	5,435,139	5,435,139	
Total	36,659,435	7,551,836	8,964,585	16,387,400	38,546,724	29,802,173	137,912,153	

(*) The figures represent total risk amounts before credit risk mitigation and after credit conversion factor.

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II. Explanations on unconsolidated credit risk (continued)

11. Explanations on risk categories as per the Article 6 of the Regulation on Measurement and Assessment of Capital Adequacy Ratios of Banks

In determining the risk weights of the risk categories mentioned in Article 6th of the Regulation on Measurement and Assessment of Capital Adequacy of Banks, the Bank uses the ratings provided by international rating firm, Fitch Ratings and national rating firm, JCR Avrasya Derecelendirme A.Ş. in the Credit Risk Based Amount calculations as of 31 December 2024. Fitch ratings are used for the risk exposures to banks where the counterparties are resident in abroad. Furthermore, Fitch ratings are used for foreign currency securities issued by Treasury and other foreign currency risks that are associated with Central governments. JCR Avrasya Rating A.Ş ratings are used for TL receivables, the counterparty of which is in the corporate asset class.

Matching of the risk ratings used in calculations with the credit quality grades stated in the Regulation on Measurement and Assessment of Capital Adequacy of Banks is presented below.

Credit quality level	1	2	3	4	5	6
Fitch derece note	AAA to AA-	A+ to A-	BBB+ to BBB-	BB+ to BB-	B+ to B-	CCC+ and below
JCR derece note	AAA to AA-	A+ to A-	BBB+ to BB-		BB- and below	

Risk amounts based on risk weights

Current period	0%	10%	20%	35%	50%	75%	100%	150%	250%	Others	Deducted from equity
Amount before credit risk mitigation	74,159,166	-	14,860,282	-	10,613,163	21,132,815	54,603,879	8,672,043	-	-	2,460,855
Amount after credit risk mitigation	74,161,560	-	14,026,479	3,041,706	11,752,319	17,624,941	53,649,988	8,671,109	-	-	2,460,855

Prior period	0%	10%	20%	35%	50%	75%	100%	150%	250%	Others	Deducted from equity
Amount before credit risk mitigation	41,643,038	-	20,070,338	-	15,099,754	12,689,570	37,381,385	7,646,832	-	3,381,236	2,258,314
Amount after credit risk mitigation	41,656,747	-	13,677,195	1,392,525	15,627,102	10,922,399	36,822,168	7,642,825	-	3,381,236	2,258,314

12. Miscellaneous information regarding important sectors or counterparty type

The Bank evaluates its financial assets in 3 stages based on TFRS 9 as explained in Section Three note VIII. In this respect, the lifetime expected credit losses are recognized for impaired loans (defaulted) and the probability of default is considered as 100%.

When the loan is not defaulted yet, but there is a significant increase in the credit risk since origination date, the lifetime expected credit losses are calculated for these loans (Stage 2).

For loans in stage 1, 12 months default probability is calculated. The expected credit loss within 12 months from the date of reporting is recognized in the financial statements.

Current period	Loans (*)		Expected credit losses (TFRS 9)
	Impaired (TFRS 9)		
Important sectors / Counterparties	Significant increase in credit risk (Stage 2)	Defaulted (Stage 3)	
Agriculture	14,369	8,470	11,319
Farming and raising livestock	14,336	6,345	5,790
Forestry	-	114	64
Fishing	33	2,011	5,465
Manufacturing	1,886,085	263,018	295,743
Mining	4,729	24,923	29,868
Production	1,881,356	237,438	263,196
Electricity, gas, water	-	657	2,679
Construction	2,709,792	151,923	170,468
Services	1,492,526	354,463	427,473
Wholesale and retail trade	562,028	292,921	278,088
Hotel food, beverage services	243,203	12,751	13,266
Transportation and telecommunication	48,827	23,212	23,434
Financial institutions	9,654	431	11,520
Real estate and lending service	121,969	7,096	7,376
Self-employment service	471,990	14,689	86,063
Education service	2,428	1,467	1,752
Health and social services	32,427	1,896	5,974
Other	942,272	228,545	350,182
Total	7,045,044	1,006,419	1,255,185

(*) Represents the distribution of cash loans.

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II. Explanations on unconsolidated credit risk (continued)

Prior Period	Loans (*)		Expected credit losses (TFRS 9)
	Impaired (TFRS 9)		
	Significant increase in credit risk (Stage 2)	Defaulted (Stage 3)	
Important sectors / Counterparties			
Agriculture	-	13,503	21,032
Farming and raising livestock	-	11,231	9,005
Forestry	-	114	91
Fishing	-	2,158	11,936
Manufacturing	3,632,063	249,331	484,757
Mining	-	26,366	38,824
Production	3,632,063	222,308	431,034
Electricity, gas, water	-	657	14,899
Construction	2,006,725	105,603	147,405
Services	3,816,768	415,989	487,692
Wholesale and retail trade	511,475	301,541	267,747
Hotel food, beverage services	145,364	53,435	50,233
Transportation and telecommunication	88,001	30,210	36,054
Financial institutions	1,776,802	414	16,755
Real estate and lending service	91,310	8,957	11,557
Self-employment service	1,191,716	17,793	99,242
Education service	678	1,528	1,471
Health and social services	11,422	2,111	4,633
Other	887,731	189,145	273,849
Total	10,343,287	973,571	1,414,735

(*) Represents the distribution of cash loans.

13. Information related to value adjustments and credit provisions

Current period	Opening balance	Provisions made within the term	Provision cancellations	Other adjustments (*)	Closing balance
Stage 3 provision	961,992	394,286	(290,259)	-	1,066,019
Stage 1 and stage 2 provisions (**)	846,630	517,035	(649,770)	-	713,895

Prior period	Opening balance	Provisions made within the term	Provision cancellations	Other adjustments (*)	Closing balance
Stage 3 provision	1,145,263	356,868	(540,139)	-	961,992
Stage 1 and stage 2 provisions (**)	759,695	1,248,997	(1,162,062)	-	846,630

(*) Determined according to currency differences, merges, acquisitions and selling of subsidiaries.

(**) Includes provisions accounted under equity for financial assets at fair value through other comprehensive income.

14. Exposures subject to countercyclical capital buffer

Country name	RWA calculations for private sector loans in banking book	RWA calculations for trading book	Total
Turkey	83,759,475	1,765,672	85,525,147
United Kingdom	187,051	398,860	585,911
Azerbaijan	-	-	-
France	102,874	142,578	245,452
USA	30,949	35,098	66,047
Ireland	1,309,386	-	1,309,386
Holland	153,998	163,145	317,143
Greece	5,573	-	5,573
Germany	50,109	-	50,109
Romania	7	-	7
Other	688,352	-	688,352
Total	86,287,774	2,505,353	88,793,127

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III. Explanations on unconsolidated currency risk

Management of foreign currency risk is differentiated on the basis of ("banking book") and ("trading book"), where trading book is managed in accordance with foreign currency trading position limits as well as value at risk ("VaR") and banking book is also managed in terms of foreign currency position limits scope. The results of limit utilizations are shared periodically with related senior management, Asset Liability Committee, Risk Committee and the Board of Directors. Besides, currency risk is also taken into account in the capital adequacy ratio calculation as part of the market risk under the standard method.

The simple arithmetic average of USD and EUR buying rates of the Bank for the thirty days before the balance sheet date are 35.0062 (Full TL) and 36.6696 (Full TL) respectively.

The Bank's USD and EUR buying rates as of balance sheet date and five business days prior to this date are as follows:

	1 USD	1 EUR
The Bank's "foreign exchange buying rates" (31 December 2024)	35.3618	36.6242
Previous days;		
30 December 2024	35.3231	36.8914
27 December 2024	35.2138	36.7456
26 December 2024	35.2548	36.6474
25 December 2024	35.2548	36.6474
24 December 2024	35.2548	36.6474

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III. Explanations on unconsolidated currency risk (continued)

Information related to currency risk:

	EURO	USD	Other FC	Total
Current period				
Assets				
Cash (cash in vault, foreign currency cash, money in transit, checks purchased) and balances with the Central Bank of Turkey	6,568,416	9,718,902	2,817,865	19,105,183
Banks	993,559	703,768	41,402	1,738,729
Financial assets at fair value through profit or loss	883,655	213,421	-	1,097,076
Money market placements	-	-	-	-
Financial assets measured at fair value through other comprehensive income	2,842	-	-	2,842
Loans	19,775,247	8,433,279	-	28,208,526
Investments in associates, subsidiaries and joint ventures (business partnerships)	1,702,965	334	-	1,703,299
Financial assets measured at amortised cost	-	-	-	-
Hedging derivative financial assets	-	-	-	-
Tangible assets	-	-	-	-
Intangible assets	-	-	-	-
Other assets (*)	(73,296)	(53,788)	(129)	(127,213)
Total assets	29,853,388	19,015,916	2,859,138	51,728,442
Liabilities				
Bank deposit	17	8	29,069	29,094
Foreign currency deposits	13,665,867	13,244,148	8,825,045	35,735,060
Funds from interbank money market	714,647	-	-	714,647
Borrowings	9,284,139	2,029,788	-	11,313,927
Marketable securities issued (**)	-	5,128,095	-	5,128,095
Miscellaneous payables	416,934	149,808	13	566,755
Hedging derivative financial liabilities	-	134,702	-	134,702
Other liabilities	570,063	228,326	8,686	807,075
Total liabilities	24,651,667	20,914,875	8,862,813	54,429,355
Net on balance sheet position	5,201,721	(1,898,959)	(6,003,675)	(2,700,913)
Net off-balance sheet position	(3,698,367)	269,596	6,018,127	2,589,356
Financial derivative assets	25,273,634	36,532,914	6,822,752	68,629,300
Financial derivative liabilities	28,972,001	36,263,318	804,625	66,039,944
Non-cash loans	16,451,105	7,406,009	30,420	23,887,534
Prior period				
Total assets	22,302,186	23,550,127	2,370,460	48,222,773
Total liabilities	23,065,914	17,030,251	6,917,746	47,013,911
Net on-balance sheet position	(763,728)	6,519,876	(4,547,286)	1,208,862
Net off-balance sheet position	1,819,380	(7,027,665)	4,556,152	(652,133)
Financial derivative assets	31,936,736	49,717,672	9,062,739	90,717,147
Financial derivative liabilities	30,117,356	56,745,337	4,506,587	91,369,280
Non-cash loans	11,087,483	5,877,431	30,024	16,994,938

(*) Includes TFRS 9 provisions classified as Foreign Currency Expected Credit Losses as of the current period.

(**) Includes securities issued as subordinated loan presented under subordinated debts in balance sheet.

In the foreign currency risk table:

There is no foreign currency indexed loans (31 December 2023: None).

The foreign currency amounts which are not included in currency risk table according to the regulation about foreign currency net general position/capital adequacy standard ratio are explained below with the order in the table above.

Held-for-trading derivative financial assets: TL 1,097,432 (31 December 2023: TL 807,694).

Held-for trading derivative financial liabilities: TL 2,859,162 (31 December 2023: TL 574,853).

Interest rate swap-buy transactions and options-buy: TL 29,022,889 (31 December 2023: TL 13,272,229).

Interest rate swap-sell transactions and options-sell: TL 29,022,889 (31 December 2023: TL 13,272,229).

Financial derivative assets/liabilities include the foreign currency buy/sell transactions indicated below.

Forward foreign currency-buy transactions: TL 1,409,066 (31 December 2023: TL 6,814,751).

Forward foreign currency-sell transactions: TL 949,687 (31 December 2023: TL 5,866,292).

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III. Explanations on unconsolidated currency risk (continued)

Sensitivity to currency risk

Table below shows the sensitivity of the Bank to a 10% change in USD and EUR rates.

Percentage change in exchange rates		Effect on profit / loss before tax		Effect on equity (*)	
		31 December 2024	31 December 2023	31 December 2024	31 December 2023
USD	10% increase	(162,936)	(50,779)	-	-
USD	10% decrease	162,936	50,779	-	-
EUR	10% increase	150,335	105,565	-	-
EUR	10% decrease	(150,335)	(105,565)	-	-

(*) Represents effect on equity excluding profit/loss before tax.

IV. Explanations on unconsolidated interest rate risk

Interest risk, which refers to the loss due to interest sensitive assets and liabilities in balance sheet and off-balance sheet items that might be subject to the changes in the interest rate as a result of maturity/repricing mismatch, is differentiated and managed on the basis of banking book and trading book as part of compliance with both Basel regulations and other international standards. Within this context, in addition to the value at ("VaR") risk limit for trading book, sensitivity limits against interest rate shocks are defined for trading books and banking books. Capital requirement that relates to market risk is calculated through the "Standard Method" according to Basel II.

In order to hedge interest rate risk, hedging strategies are applied through off-balance sheet transactions within the limits approved by the Board of Directors, and interest rate risk is managed by ensuring discreetly between fixed and floating rate assets and liabilities within the balance sheet.

The limit utilization monitoring and sensitivity analysis related to the interest rate risk on the balance sheet are performed regularly and the results are shared with the related senior management, Asset Liability Committee, Risk Committee and the Board of Directors periodically. Internal reporting for the interest rate risk in the banking books are made on a daily and monthly basis, whereas interest rate risk in the banking books standard ratio is reported to BRSA on a monthly basis.

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IV. Explanations on unconsolidated interest rate risk (continued)

1. Information related to the interest rate sensitivity of assets, liabilities and off-balance sheet items (based on re-pricing dates)

Current period	Up to 1 month	1-3 months	3-12 months	1-5 years	5 years and over	Non-interest bearing	Total
Assets							
Cash (cash in vault, foreign currency cash, money in transit, checks-purchased) and balances with the Central Bank of Turkey	15,244,753	-	-	-	-	24,099,372	39,344,125
Banks	1,498,702	-	-	-	-	247,719	1,746,421
Financial assets at fair value through profit and loss	1,273,579	746,609	487,143	86,992	1,588,288	574	4,183,185
Money market placements	20,273,676	-	-	-	-	-	20,273,676
Financial assets measured at fair value through other comprehensive income	3,963,093	41,871	-	1,411,066	-	114,514	5,530,544
Loans	20,363,516	10,756,179	32,065,184	17,160,880	2,242,796	1,074,002	83,662,557
Financial assets measured at amortised cost	10,904	-	-	11,901,446	768,660	-	12,681,010
Other assets (*)	-	-	-	-	-	12,165,283	12,165,283
Total assets	62,628,223	11,544,659	32,552,327	30,560,384	4,599,744	37,701,464	179,586,801
Liabilities							
Bank deposits	6,214,365	-	-	-	-	41,668	6,256,033
Other deposits	82,197,378	9,405,565	3,459,013	191	-	29,783,547	124,845,694
Money market borrowings	104,225	-	-	-	714,647	-	818,872
Miscellaneous payables	672,881	-	-	-	-	1,334,638	2,007,519
Securities issued (***)	-	-	9,713	-	5,118,382	-	5,128,095
Funds obtained from other financial institutions	6,615,381	4,642,029	30,310	30,310	-	-	11,318,030
Other liabilities (**)	829,860	3,458,635	705,013	5,285	-	24,213,765	29,212,558
Total liabilities	96,634,090	17,506,229	4,204,049	35,786	5,833,029	55,373,618	179,586,801
Balance sheet long position	-	-	28,348,278	30,524,598	-	-	58,872,876
Balance sheet short position	(34,005,867)	(5,961,570)	-	-	(1,233,285)	(17,672,154)	(58,872,876)
Off-balance sheet long position	28,309,279	39,601,227	-	-	-	-	67,910,506
Off-balance sheet short position	-	-	(43,933,390)	(25,936,401)	(870,000)	-	(70,739,791)
Total position	(5,696,588)	33,639,657	(15,585,112)	4,588,197	(2,103,285)	(17,672,154)	(2,829,285)

(*) Non-interest bearing column in other assets line consists of tangible assets, intangible assets, assets held for sale, associates and subsidiaries, expected credit losses, investment property and other assets.

(**) Non-interest bearing column in other liabilities line consists of other liabilities except than miscellaneous payables, provisions, current tax liability, deferred tax liability and equity.

(***) Includes securities issued as subordinated loan presented under subordinated debts in balance sheet.

Prior year's information related to the interest rate sensitivity of assets, liabilities and off-balance sheet items (based on re-pricing dates)

Prior period	Up to 1 month	1-3 months	3-12 months	1-5 years	5 years and over	Non-interest bearing	Total
Assets							
Cash (cash in vault, foreign currency cash, money in transit, checks purchased) and balances with the Central Bank of Turkey	-	-	-	-	-	26,957,378	26,957,378
Due from other banks and financial institutions	1,085,900	-	-	-	-	319,474	1,405,374
Financial assets at fair value through profit and loss	409,358	1,031,027	456,166	136,437	217,043	311	2,250,342
Money market placements	8,508,257	-	-	-	-	-	8,508,257
Available-for-sale financial assets	1,769,402	27,947	14,098	1,976,954	-	66,629	3,855,030
Loans and receivables	28,873,853	11,132,822	23,412,483	9,165,324	2,263,797	998,798	75,847,077
Held-to-maturity investments	8,896,793	-	14,896	540,030	506,392	12,489	9,970,600
Other assets (*)	-	-	-	-	-	11,726,187	11,726,187
Total assets	49,543,563	12,191,796	23,897,643	11,818,745	2,987,232	40,081,266	140,520,245
Liabilities							
Bank deposits	3,665,528	-	-	-	-	13,721	3,679,249
Other deposits	51,095,808	12,080,739	7,255,675	3,022	-	26,233,883	96,669,127
Money market borrowings	16,143	-	-	-	167,635	-	183,778
Miscellaneous payables	357,221	-	-	-	-	1,210,167	1,567,388
Securities issued	-	-	-	-	-	-	-
Funds obtained from other financial institutions	11,025,852	1,229,781	1,480,031	-	-	-	13,735,664
Other liabilities (**)	571,504	1,513,819	346,408	442	-	22,252,866	24,685,039
Total liabilities	66,732,056	14,824,339	9,082,114	3,464	167,635	49,710,637	140,520,245
Balance sheet long position	-	-	14,815,529	11,815,281	2,819,597	-	29,450,407
Balance sheet short position	(17,188,493)	(2,632,543)	-	-	-	(9,629,371)	(29,450,407)
Off-balance sheet long position	-	-	12,395,872	5,636,649	475,000	-	18,507,521
Off-balance sheet short position	(2,900,066)	(15,065,270)	-	-	-	-	(17,965,336)
Total position	(20,088,559)	(17,697,813)	27,211,401	17,451,930	3,294,597	(9,629,371)	542,185

(*) Non-interest bearing column in other assets line consists of tangible assets, intangible assets, assets held for sale, associates and subsidiaries, expected credit losses, investment property, current tax asset and other assets.

(**) Non-interest bearing column in other liabilities line consists of other liabilities except than miscellaneous payables, provisions, current tax liability and equity.

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IV. Explanations on unconsolidated interest rate risk (continued)

2. Current period average interest rates applied to monetary financial instruments

Current period	EUR (%)	USD (%)	Yen (%)	TL (%)
Assets				
Cash (Cash in vault, foreign currency cash, money in transit, checks purchased) and balances with the Central Bank of Turkey	-	-	-	33.00
Banks	2.58	3.95	-	-
Financial assets at fair value through profit and loss	2.60	6.82	-	25.85
Money market placements	-	-	-	47.50
Financial assets measured at fair value through other comprehensive income	-	-	-	39.37
Loans	6.24	7.99	-	45.12
Financial assets measured at amortised cost	-	-	-	40.72
Liabilities				
Bank deposits	-	-	-	18.10
Other deposits	0.34	0.29	-	41.26
Money market borrowings	-	-	-	35.00
Miscellaneous payables	-	-	-	-
Securities issued (*)	-	8.50	-	-
Funds obtained from other financial institutions	4.67	6.75	-	23.00

(*) Includes securities issued as subordinated loan presented under subordinated debts in balance sheet.

Prior period average interest rates applied to monetary financial instruments

Prior period	EUR (%)	USD (%)	Yen (%)	TL (%)
Assets				
Cash (Cash in vault, foreign currency cash, money in transit, checks purchased) and balances with the Central Bank of Turkey	-	-	-	-
Banks	3.55	4.04	-	-
Financial assets at fair value through profit and loss	2.94	6.41	-	11.22
Money market placements	-	-	-	43.56
Financial assets measured at fair value through other comprehensive income	-	-	-	18.59
Loans	6.78	10.31	-	36.13
Financial assets measured at amortised cost	-	-	-	31.24
Liabilities				
Bank deposits	-	4.50	-	33.82
Other deposits	0.10	0.17	-	28.63
Money market borrowings	-	-	-	27.30
Miscellaneous payables	-	-	-	-
Securities issued	-	-	-	-
Funds obtained from other financial institutions	7.34	9.42	-	20.50

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V. Explanations on equity securities position risk derived from unconsolidated banking books

1. Explanations on accounting policies for equity investments in subsidiaries and associates

Accounting policies for equity investments in subsidiaries and associates are disclosed in section III disclosure III.

2. Comparison of carrying value, fair value and market value of equity investments

Current period	Carrying value	Fair value (*)	Market value
Quoted	-	-	-
Equity investments	-	-	-
Not quoted	114,514	67,436	67,436
Equity investments	114,514	67,436	67,436
Financials subsidiaries	2,791,511	-	-
Financials subsidiaries	2,791,511	-	-
Prior period	Carrying value	Fair value (*)	Market value
Quoted	-	-	-
Equity investments	-	-	-
Not quoted	66,629	34,144	34,144
Equity investments	66,629	34,144	34,144
Financials subsidiaries	2,182,061	-	-
Financials subsidiaries	2,182,061	-	-

(*) Only equity investments having market value are presented under "Fair value" column.

3. Information on realized gains or losses on revaluation of securities, revaluation surplus and unrealized gains or losses and their included amounts in core and additional capital

	Realized gains/losses during the period	Revaluation increases		Unrealized gains/ losses	
		Total	Including into the additional capital	Total	Including into the core capital
Current period					
Private equity investments	-	-	-	-	-
Shares traded on a stock exchange	-	-	-	-	-
Other stocks	-	57,654	-	56,734	56,734
Total	-	57,654	-	56,734	56,734
	Realized gains/losses during the period	Revaluation increases		Unrealized gains/ losses	
		Total	Including into the supplementary capital	Total	Including into the core capital
Prior period					
Private equity investments	-	-	-	-	-
Shares traded on a stock exchange	-	-	-	-	-
Other stocks	-	24,452	-	23,443	23,443
Total	-	24,452	-	23,443	23,443

4. Capital requirement as per equity shares

Current period	Carrying value	Total RWA	Minimum capital requirement (*)
Private equity investments	-	-	-
Shares traded on a stock exchange	-	-	-
Other equity shares	2,906,025	2,906,025	232,482
Prior period	Carrying value	Total RWA	Minimum capital requirement (*)
Private equity investments	-	-	-
Shares traded on a stock exchange	-	-	-
Other equity shares	2,248,690	2,248,690	179,895

(*) The amount is calculated by using standard method within the scope of the "Regulation on Measurement and Evaluation of Capital Adequacy of Banks".

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VI. Explanations on unconsolidated liquidity risk management, liquidity coverage ratio and net stable funding ratio

1. Information on matters related to liquidity risk

a. Information on liquidity risk management, such as risk capacity, responsibilities and the structure of liquidity risk management, the Bank's internal liquidity risk reporting, communication between the Board of Directors and business lines on liquidity risk strategy, policy and application

A policy ("Market Risk Management Policy") was established which includes actions to be taken and practices that might be applied in business as usual and stressed conditions for liquidity risk management and responsibilities of the senior management. This policy has been approved by the Asset Liability Committee and by the Board of Directors. Within the scope of this policy, the liquidity risk is managed by Asset Liability Committee where senior representatives of businesses are members of the Committee.

In accordance with the policy, a liquidity buffer that can supply adequate liquidity level under any economic circumstances and which is unpledged, has been defined. In addition, the Contingency Capital and Funding Plan ("CCFP") to be implemented in times of stress is currently in force. Besides, liquidity risk appetite that is approved by Asset Liability Committee and Board of Directors has been established in order to enable monitoring and managing the risk quantitatively. The relevant parameters are analyzed regularly and reported to the members of Asset Liability Committee and Board of Directors.

Furthermore, the Bank's liquidity buffer is evaluated under different stress scenarios with the comprehensive liquidity stress test approach established in accordance with ING Group's common policies on market risk and global regulations (Internal Liquidity Adequacy Assessment Process / ILAAP-Internal Liquidity Adequacy Assessment Process). In addition, there is also annual self- assessment process still within scope of ILAAP in order to ensure the existence and adequacy of building blocks of ILAAP, hence the sound management of liquidity risk.

To ensure proactive management of funding liquidity risk, risk thresholds specified on the deposit flows are monitored. The CCFP monitoring metrics are not limited to this scope but also include other liquidity risk indicators. The CCFP monitoring metrics can trigger decision-making conditions on whether the Bank will implement the CCFP in order to anticipate the potential development in liquidity stressed conditions.

b. Information on the centralization degree of liquidity management and funding strategy and the functioning between the Bank and the Bank's subsidiaries

The liquidity risk of the Bank is managed by the Asset Liability Management. Furthermore, subsidiaries manage their own liquidity risk by themselves. In order to make a central funding strategy, a funding plan including subsidiaries is established every year. In addition, information about the implementation and realization of the funding plan is shared with the Asset Liability Committee. According to the limits that are approved by the Board of Directors, liquidity gap and surplus are monitored and actions are taken in accordance with the price, interest rate and maturity structure.

c. Information on the Bank's funding strategy including the policies on funding types and variety of maturities

As for the funding diversification; short, medium and long term targets are determined in parallel to business line planning as part of the budgeting process in the Bank. Besides, the Bank's funding capacity is monitored regularly, and shared with Asset Liability Committee and Board of Directors. In this way, the factors which may affect the ability to create additional funding and the validity of the estimated funding capacity can be monitored closely by senior management.

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VI. Explanations on unconsolidated liquidity risk management, liquidity coverage ratio and net stable funding ratio (continued)

ç. Information on liquidity management on the basis of currencies constituting a minimum of five percent of the Bank's total liabilities

Almost all of the Bank's liabilities are in TL, USD or EUR, and TL funds consist of mainly equity and deposits. The Bank's liquidity in TL is managed via repo / reverse repo transactions with / in CBRT/BIST using high quality securities owned by the Bank. While the main purpose is using liabilities in TL to fund TL assets, the necessary FX swap transactions and FC funds are used in creating assets in TL within the limits that is approved by the Board of Directors. Foreign currency funds are obtained through FC deposit, subordinated debt and foreign based FC borrowings including syndications. Liquidity shortage/surplus are calculated on a daily basis by Asset Liability Management and these figures are reported to the related Asset Liability Committee members. Besides, the Total and FC liquidity coverage ratio is calculated on a daily basis, and shared with all related units and senior management, and reported separately to Asset Liability Committee and Board of Directors. The Bank has TL/FC borrowing limits ready to use in CBRT and other banks.

d. Information on liquidity risk mitigation techniques

The first measure towards the mitigation of the liquidity risk as part of the budget process is planning the reduction of maturity mismatch and funding diversity. Within this context, syndication, other foreign funding, parent funding and other domestic funding facilities are used. In addition to this, active swap markets are used to provide liquidity in a particular currency. In addition to all these, Contingency Capital and Funding Plan monitoring indicators are continuously monitored and reported regularly to Asset Liability Committee, Risk Committee and Board of Directors. With these indicators, intervals indicating the actions to be taken according to the triggering levels and measurement methods such as actual deposit inflows and outflows, stress test, liquidity buffer level, regulatory and structural liquidity ratios and so on are defined and these intervals support the decision making process. Moreover, a set of mitigating actions was set in the Contingency Capital and Funding Plan to bring the Bank's liquidity buffer back to reasonable levels during the crisis period. The important factors that will support the decision making mechanism, including the feasibility of these actions depending on the financial impact and stress scenarios, execution time of the actions are also explained.

e. Information on the use of stress tests

The Bank has a written liquidity stress testing procedure which includes the implementation of stress testing and responsibilities that is approved by Asset Liability Committee. To ensure that the existing positions remain within risk tolerance, the Market Risk Management Directorate plans, designs, manages the stress tests, reports the results to Asset Liability Committee, Risk Committee and Board of Directors on a regularly basis and reviews the stress tests annually. Stress test scenarios of the Bank consider Bank specific, market-wide and combined scenario, and reflect short term or long term consequences, are used in stress testing where the scenario and parameters are reviewed annually with the participation of the Asset and Liability Management and related business lines. On the other hand, results of stress testing are used as the leading indicator within the process of activating the Contingency Capital and Funding Plan.

f. Overview on contingency funding plan

The Bank has established the Contingency Capital and Funding Plan that was approved by Asset Liability Committee and Board of Directors, which includes the policies, methods and responsibilities of senior management and business lines that can be applied in stressed situations or in liquidity shortages. In addition, as an early warning of liquidity shortage or an unexpected situation, contingency capital and funding plan monitoring indicators are monitored and presented to the ALCO members monthly and to the Board of Directors (per meeting) by the Market Risk Management Directorate. The effective internal and external communication channels and a Liquidity Contingency Team are defined in order to ensure the liquidity contingency management and implement various elements of the plan/realistic actions of the plan. Monitoring metrics of the Contingency Capital and Funding Plan are reviewed annually in terms of changes in market and stress conditions.

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VI. Explanations on unconsolidated liquidity risk management, liquidity coverage ratio and net stable funding ratio (continued)

2. Liquidity coverage ratio

In accordance with BRSA's "Regulation on Banks' Liquidity Coverage Ratio Calculation", promulgated in the Official Gazette, no. 28948, dated 21 March 2014, the Bank calculates and shares the Liquidity Coverage Ratio to BRSA on a weekly basis. Liquidity Coverage Ratio is above the values stated in the regulation.

Weeks and values of the lowest and highest FC and total liquidity coverage ratio calculated over the last three months are presented in the below table.

	Minimum	Date	Maximum	Date
TL+FC	328.57%	27 December 2024	423.44%	4 October 2024
FC	97.27%	20 December 2024	180.42%	18 October 2024

Liquidity coverage ratio

Current period	Total unweighted value (*)		Total weighted value (*)	
	TL+FC	FC	TL+FC	FC
High quality liquid assets				
High quality liquid assets			48,941,244	18,867,381
Cash Outflows				
Real person and retail deposits	95,291,032	22,891,170	8,261,936	2,282,672
Stable deposits	25,343,350	128,911	1,267,168	6,446
Less stable deposits	69,947,682	22,762,259	6,994,768	2,276,226
Unsecured funding other than real person and retail deposits	37,101,116	12,551,897	22,612,441	6,824,778
Operational deposits	248,264	-	57,940	-
Non-operational deposits	30,960,172	10,634,774	16,805,246	4,910,524
Other unsecured debt	5,892,680	1,917,123	5,749,255	1,914,254
Secured funding			-	-
Other cash outflows	49,810,339	24,225,934	22,817,978	14,342,088
Derivative exposures and collateral completion liabilities	18,436,804	11,624,539	18,436,805	11,624,539
Payables due to structured financial instruments	-	-	-	-
Payment commitments and other off-balance sheet commitments granted for debts to financial markets	31,373,535	12,601,395	4,381,173	2,717,549
Other contractual funding obligations	-	-	-	-
Other irrevocable or conditionally revocable off balance sheet liabilities	-	-	-	-
Total cash outflows			53,692,355	23,449,538
Cash inflows				
Secured lending	23,229,738	-	-	-
Unsecured lending	30,836,699	2,801,184	27,612,409	1,897,324
Other cash inflows	19,264,198	6,561,752	18,393,161	6,558,523
Total cash inflows	73,330,635	9,362,936	46,005,570	8,455,847
			Total adjusted value	
Total high quality liquid assets stock			48,941,244	18,867,381
Total net cash outflows			13,543,508	14,993,691
Liquidity coverage ratio (%)			364.05	129.32

(*) Simple arithmetic average calculated for the last three months of the liquidity coverage ratio by using the amounts calculated based on weekly simple arithmetic averages.

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VI. Explanations on unconsolidated liquidity risk management, liquidity coverage ratio and net stable funding ratio (continued)

Prior period	Total unweighted value (*)		Total weighted value (*)	
	TL+FC	FC	TL+FC	FC
High quality liquid assets				
High quality liquid assets			43,233,643	16,465,919
Cash Outflows				
Real person and retail deposits	78,632,090	23,369,005	6,969,268	2,333,260
Stable deposits	17,878,811	72,804	893,940	3,640
Less stable deposits	60,753,279	23,296,201	6,075,328	2,329,620
Unsecured funding other than real person and retail deposits	28,772,047	11,257,788	16,876,018	6,328,074
Operational deposits	184,715	359	43,682	90
Non-operational deposits	24,690,500	9,349,402	13,017,807	4,425,222
Other unsecured debt	3,896,832	1,908,027	3,814,529	1,902,762
Secured funding			-	-
Other cash outflows	31,360,681	15,354,327	15,913,945	7,085,953
Derivative exposures and collateral completion liabilities	12,908,623	4,734,860	12,908,623	4,734,861
Payables due to structured financial instruments	-	-	-	-
Payment commitments and other off-balance sheet commitments granted for debts to financial markets	18,452,058	10,619,467	3,005,322	2,351,092
Other contractual funding obligations	-	-	-	-
Other irrevocable or conditionally revocable off balance sheet liabilities	-	-	-	-
Total cash outflows			39,759,231	15,747,287
Cash inflows				
Secured lending	9,809,185	-	-	-
Unsecured lending	14,172,208	1,866,687	10,833,267	1,335,493
Other cash inflows	12,672,601	8,646,637	12,122,753	8,595,311
Total cash inflows	36,653,994	10,513,324	22,956,020	9,930,804
			Total adjusted value	
Total high quality liquid assets stock			43,233,643	16,465,919
Total net cash outflows			17,002,348	6,561,710
Liquidity coverage ratio (%)			264.83	315.08

(*) Simple arithmetic average calculated for the last three months of the liquidity coverage ratio by using the amounts calculated based on weekly simple arithmetic averages.

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VI. Explanations on unconsolidated liquidity risk management, liquidity coverage ratio and net stable funding ratio (continued)

3. Other explanations on unconsolidated liquidity coverage ratio

Short term liquidity is managed within the regulatory limits in the Bank, the liquid assets are managed by using "Liquidity Coverage Ratio" calculations to monitor the minimum liquidity limits and keep sufficient stock of high quality liquid assets to meet the net cash outflows. Liquidity coverage ratio is calculated as per the Regulation on Banks' Liquidity Coverage Ratio Calculation. The ratio is affected from Bank's unpledged high quality liquid asset value that can be converted to cash any time and the possible cash inflows and outflows arising from assets, liability and off balance sheet items of the Bank.

The Bank evaluates cash equivalents, time and demand deposit accounts held in Central Bank of Turkey ("CBRT"), reserve requirements and the unencumbered securities issued by the Treasury as high quality liquid assets.

The primary sources to meet the liquidity needs of the Bank are funds from interbank money market or repurchasing agreements or direct sales of the HTC&S portfolio. Besides the borrowing from the parent company in the medium and long term, in order to manage concentration risk with respect to funding resources, the Bank aims to reduce maturity mismatch and mitigate the liquidity risk by taking actions aiming to increase diversification in funding resources. A strategy in targeting small ticket size on the deposits is implemented as another element of the strategy to mitigate the concentration risk.

Although the Bank's wide range and small ticket size deposit structure including Orange Account represents a short term funding source parallel to the sector it renews itself at the maturity date and remains in the Bank for a longer period compared to its original maturity.

Details of the Bank's foreign currency balance sheet as of 31 December 2024 are summarized as follows:

Foreign currency deposits constitute the majority of the foreign currency liabilities. 20% of the Bank's foreign currency liabilities consist of funds obtained from other financial institutions, 9% are subordinated debts and 63% is composed of deposits. Cash and cash equivalents comprise 39% and loans comprise 53% of the foreign currency assets. The bank placements have the shortest maturity within the assets denominated in foreign currency.

Details of the Bank's Turkish Lira balance sheet as of 31 December 2024 are summarized as follows:

The majority of Turkish Lira balance sheet's liability consists of deposits. 78% of the Bank's total Turkish Lira liabilities consists of deposits. However, in case of necessity, the Bank has borrowing facilities both in domestic & foreign banks and Takasbank & BIST repo market. 43% of the assets in Turkish Lira balance sheet are net loans and 15% are marketable securities.

The cash flows from derivative financial instruments are included in LCR calculations according to the terms of regulation. The Bank also considers changes in fair value of the liabilities that result in margin calls when calculating cash outflows.

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VI. Explanations on unconsolidated liquidity risk management, liquidity coverage ratio and net stable funding ratio (continued)

4. Breakdown of assets and liabilities according to their outstanding maturities

Current period	Demand	Up to 1 month	1-3 months	3-12 months	1-5 years	5 years and over	Unallocated	Total
Assets								
Cash (cash in vault, foreign currency cash, money in transit, checks purchased) and balances with the Central Bank of Turkey	27,671,376	11,672,749	-	-	-	-	-	39,344,125
Banks	1,746,421	-	-	-	-	-	-	1,746,421
Financial assets at fair value through profit or loss	-	794,920	463,599	821,082	524,081	1,578,929	574	4,183,185
Money market placements	-	20,273,676	-	-	-	-	-	20,273,676
Financial assets measured at fair value through other comprehensive income	-	287,053	12,229	85,035	5,031,713	-	114,514	5,530,544
Loans	67,583	17,020,743	10,598,778	33,313,341	19,412,897	2,242,796	1,006,419	83,662,557
Financial assets measured at amortised cost	-	10,904	-	-	11,901,446	768,660	-	12,681,010
Other assets (*)	-	-	-	-	-	-	12,165,283	12,165,283
Total assets	29,485,380	50,060,045	11,074,606	34,219,458	36,870,137	4,590,385	13,286,790	179,586,801
Liabilities								
Bank deposits	41,668	6,214,365	-	-	-	-	-	6,256,033
Other deposits	29,852,207	82,128,718	9,405,565	3,459,013	191	-	-	124,845,694
Borrowings	-	91,834	3,229,382	7,260,181	736,633	-	-	11,318,030
Funds from interbank money market	-	104,225	-	-	-	714,647	-	818,872
Securities issued (***)	-	-	-	9,713	-	5,118,382	-	5,128,095
Miscellaneous payables	1,334,638	-	-	-	-	-	672,881	2,007,519
Other liabilities (**)	-	510,624	2,577,204	622,210	1,279,510	9,245	24,213,765	29,212,558
Total liabilities	31,228,513	89,049,766	15,212,151	11,351,117	2,016,334	5,842,274	24,886,646	179,586,801
Liquidity (deficit)/surplus	(1,743,133)	(38,989,721)	(4,137,545)	22,868,341	34,853,803	(1,251,889)	(11,599,856)	-
Net Off Balance Sheet Position								
Derivative financial assets	-	359,284	(2,943,165)	7,418	(271,237)	-	-	(2,847,700)
Derivative financial liabilities	-	48,337,198	49,338,660	67,364,599	61,409,811	1,005,000	-	227,455,268
Derivative financial liabilities	-	47,977,914	52,281,825	67,357,181	61,681,048	1,005,000	-	230,302,968
Non-cash loans	73,853	1,452,127	6,118,113	14,357,175	8,218,911	1,980,252	-	32,200,431
Prior period								
Total assets	19,149,273	36,493,925	13,271,396	33,079,553	22,772,168	2,987,232	12,766,698	140,520,245
Total liabilities	27,506,586	55,392,259	13,660,260	20,571,370	553,896	225,787	22,610,087	140,520,245
Liquidity (deficit)/surplus	(8,357,313)	(18,898,334)	(388,864)	12,508,183	22,218,272	2,761,445	(9,843,389)	-
Net Off Balance Sheet Position								
Derivative financial assets	-	125,843	(380,904)	1,019,203	(226,761)	-	-	537,381
Derivative financial assets	-	48,334,826	59,950,445	51,643,224	11,359,903	475,000	-	171,763,398
Derivative financial liabilities	-	48,208,983	60,331,349	50,624,021	11,586,664	475,000	-	171,226,017
Non-cash loans	60,251	996,445	3,790,013	7,131,769	7,523,097	1,098,124	-	20,599,699

(*) Unallocated column in other assets mainly consists of other assets that are necessary for banking activities and that cannot be liquidated in the short term as tangible assets, intangible assets, assets held for sale, associates and subsidiaries, expected credit losses, investment property and other assets.

(**) Unallocated column in other liabilities mainly consists of provisions, current tax liability, deferred tax liability, other liabilities except than miscellaneous payables and shareholders' equity.

(***) Includes securities issued as subordinated loan presented under subordinated debts in balance sheet.

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VI. Explanations on unconsolidated liquidity risk management, liquidity coverage ratio and net stable funding ratio (continued)

5. Net stable funding ratio

The net stable funding ratio ("NSFR"), which is a complementary liquidity measurement method to the LCR that measures banks' resilience to short-term liquidity shocks and is calculated by taking maturity matching into account, was legally shared as of 1 January 2024. The BRSA has set out the principles and procedures for banks to ensure stable funding in order to prevent the deterioration of their liquidity levels due to the funding risk that they maybe exposed to on a consolidated and unconsolidated basis in the long term. Pursuant to the "Regulation on Banks' Calculation of Net Stable Funding Ratio" published in the Official Gazette No. 32202 dated 26 May 2023, the three months implearithmetic average of the consolidated and unconsolidated net stable funding ratio calculated monthly as of the equity calculation periods cannot be less than 100% as of March, June, September and December.

Current period	a	b	c	ç	d
	Based on the remaining maturity, the amount to which the consideration rate has not been applied				Total amount with consideration rate applied
	Demand	Term Shorter Than 6 Months	6 Months and Longer than 6 Months and Shorter than 1 Year Term	1 Year and Longer Than 1 Year Term	
Current Stable Fund					
Capital Items	25,924,892	-	-	-	25,924,892
Tier 1 Capital and Tier 2 Capital	25,796,969	-	-	-	25,796,969
Other Capital Items	127,923	-	-	-	127,923
Individuals and retail customer deposits/participation funds	18,575,504	73,678,648	654,178	276	84,821,982
Stable deposit/participation fund	4,606,202	19,373,620	104,881	-	22,880,469
Low stability deposit/participation fund	13,969,302	54,305,028	549,297	276	61,941,513
Debts to other individuals	11,301,797	23,667,272	7,658,087	737,460	14,133,451
Operational deposit/participation fund	-	23,667,272	639,981	8	9,886,946
Other debts	11,301,797	-	7,018,106	737,452	4,246,505
Liabilities equivalent to interdependent assets					
Other liabilities	11,642,004	4,370,516	249,930	11,079,739	-
Derivative liabilities		4,370,516	249,930	284,942	
Other Capital Items and liabilities not listed above	11,642,004	-	-	10,794,797	-
Current Stable Fund					124,880,325
Required Stable Fund					
High-quality liquid assets					2,494,576
Operational deposits/participation funds deposited with credit institutions or financial institutions	-	-	-	-	-
Performing Receivables	55,266,481	20,303,019	43,342,035	34,921,633	53,605,691
Receivables from credit institutions or financial institutions, the collateral of which is a high-quality liquid asset	39,231,702	-	-	-	-
Receivables from credit institutions or financial institutions that are unsecured or whose collateral is not a high-quality liquid asset	-	-	-	520,784	520,784
Receivables from corporate customers, organizations, individuals and retail customers, central governments, central banks and public institutions other than credit institutions or financial institutions	16,034,205	20,303,019	43,342,035	31,105,196	50,942,446
Receivables subject to a risk weighting of 35% or less	-	-	-	-	-
Receivables collateralized by a residential real estate mortgage	-	-	-	3,295,653	2,142,174
Receivables subject to a risk weighting of 35% or less	-	-	-	-	-
Stock exchange-traded stocks and debt instruments that do not qualify as high-quality liquid assets	574	-	-	-	287
Assets equivalent to interdependent liabilities					
Other assets	2,345,941	3,019,147	285,536	18,979,582	23,196,861
Physically delivered commodities, including gold	-				-
Initial collateral of derivative contracts or guarantee fund given to the central counterparty		-	-	15,140	12,869
Derivative assets		2,686,793	260,522	1,069,198	2,585,438
The amount of derivative liabilities before deduction of the exchange collateral		332,354	25,014	128,875	486,243
Other assets not listed above	2,345,941	-	-	17,766,369	20,112,311
Off-balance sheet liabilities		7,665,353	9,986,557	28,095,502	2,287,371
Stable Fund Required					81,584,499
Net Stable Funding Rate (%)					153.07

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VI. Explanations on unconsolidated liquidity risk management, liquidity coverage ratio and net stable funding ratio (continued)

Prior period	a	b	c	ç	d
	Based on the remaining maturity, the amount to which the consideration rate has not been applied				
	Demand	Term Shorter Than 6 Months	6 Months and Longer than 6 Months and Shorter than 1 Year Term	1 Year and Longer Than 1 Year Term	Total amount with consideration rate applied
Current Stable Fund					
Capital Items	15,714,064	-	-	-	15,714,064
Tier 1 Capital and Tier 2 Capital	15,690,160	-	-	-	15,690,160
Other Capital Items	23,904	-	-	-	23,904
Individuals and retail customer deposits/participation funds	17,368,355	58,121,764	338,471	4,533	69,110,903
Stable deposit/participation fund	3,459,047	13,672,304	89,902	590	16,360,751
Low stability deposit/participation fund	13,909,308	44,449,460	248,568	3,943	52,750,152
Debts to other individuals	9,566,155	14,056,291	11,011,491	4,548	10,745,700
Operational deposit/participation fund	-	14,056,291	520,712	16	5,495,778
Other debts	9,566,155	-	10,490,779	4,532	5,249,922
Liabilities equivalent to interdependent assets					
Other liabilities	10,291,634	8,093,337	-	7,276,623	-
Derivative liabilities		8,093,337	-	1,066,025	
Other Capital Items and liabilities not listed above	10,291,634	-	-	6,210,598	-
Current Stable Fund					95,570,666
Required Stable Fund					
High-quality liquid assets					3,725,461
Operational deposits/participation funds deposited with credit institutions or financial institutions	-	-	-	-	-
Performing Receivables	32,851,061	8,496,411	46,922,922	21,643,448	42,811,658
Receivables from credit institutions or financial institutions, the collateral of which is a high-quality liquid asset	26,785,436	-	-	-	-
Receivables from credit institutions or financial institutions that are unsecured or whose collateral is not a high-quality liquid asset	-	-	861,168	728,622	1,159,206
Receivables from corporate customers, organizations, individuals and retail customers, central governments, central banks and public institutions other than credit institutions or financial institutions	6,065,314	8,496,411	46,061,754	19,369,381	40,647,758
Receivables subject to a risk weighting of 35% or less	-	-	-	-	-
Receivables collateralized by a residential real estate mortgage	-	-	-	1,545,445	1,004,539
Receivables subject to a risk weighting of 35% or less	-	-	-	-	-
Stock exchange-traded stocks and debt instruments that do not qualify as high-quality liquid assets	311	-	-	-	156
Assets equivalent to interdependent liabilities					
Other assets	1,096,964	8,101,210	497,330	22,315,520	23,909,173
Physically delivered commodities, including gold	-				-
Initial collateral of derivative contracts or guarantee fund given to the central counterparty		-	-	4,280	3,638
Derivative assets		8,101,210	-	4,804,490	4,804,490
The amount of derivative liabilities before deduction of the exchange collateral		-	-	318,487	318,487
Other assets not listed above	1,096,964	-	497,330	17,188,263	18,782,558
Off-balance sheet liabilities		3,628,683	3,859,318	10,808,679	914,834
Stable Fund Required					71,361,126
Net Stable Funding Rate (%)					133.93

The average of the three-month Net Stable Funding Rates for the current period is 158.35% (2023 last quarter 2023: 139.87%). As of 31 December 2024, the Bank's Net Stable Funding Rate is 153.07% (31 December 2023: 133.93%) and remained above the legal limit (100%). The current stable fund size reached to 124.9 billion TL, thanks to high equity, long-term resources and widespread deposit opportunities. The required stable fund amount consists of long-term loans, securities and securities given as collateral and is at the level of 81.6 billion TL. Capital items, constitute 20.8% of the current stable fund amount and individuals and retail customer deposits 67.9% of the fund amount. Performing receivables the largest share of the required stable fund amount and constitute 65.7% of the fund. In the development of the ratio, factors development of major balance sheet items such as Loans and Deposits, the change in the balance sheet maturity structure and asset collateralization are effective.

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VI. Explanations on unconsolidated liquidity risk management, liquidity coverage ratio and net stable funding ratio (continued)

6. Breakdown of liabilities according to their remaining contractual maturities

The Bank's remaining maturities of the contractual liabilities excluding derivative transactions are presented below. Interests on liabilities are included in the distribution. The "Adjustments" column presents probable cash flow on later periods. These amounts are included into the maturity analysis, but not included into the carrying value of liabilities in the balance sheet.

Current period	Demand	Up to 1 month	1-3 months	3-12 months	1-5 years	5 years and over	Total	Adjustments	Balance sheet value
Liabilities									
Deposits	29,893,875	89,636,772	10,605,406	4,640,389	276	-	134,776,718	(3,674,991)	131,101,727
Funds borrowed from other financial institutions	-	94,402	3,230,604	7,266,602	737,175	-	11,328,783	(10,753)	11,318,030
Funds from interbank money market	-	104,511	-	-	-	714,647	819,158	(286)	818,872
Securities issued (*)	-	-	-	460,575	1,803,449	7,372,695	9,636,719	(4,508,624)	5,128,095

(*) Includes securities issued as subordinated loan presented under subordinated debts in balance sheet.

Prior period	Demand	Up to 1 Month	1-3 Months	3-12 Months	1-5 Years	5 Years and over	Total	Adjustments	Balance sheet value
Liabilities									
Deposits	26,296,419	55,675,296	13,183,562	8,120,660	4,532	-	103,280,469	(2,932,093)	100,348,376
Funds borrowed from other financial institutions	-	243,577	1,234,377	12,304,761	-	-	13,782,715	(47,051)	13,735,664
Funds from interbank money market	-	16,202	-	-	-	167,636	183,838	(60)	183,778
Securities issued	-	-	-	-	-	-	-	-	-

7. Breakdown of derivative instruments according to their remaining contractual maturities

Current period	Up to 1 month	1 – 3 months	3 – 12 months	1 – 5 Years	5 years and over	Total
Derivative financial instruments held for hedging						
Transactions for fair value hedge (I)	-	-	638,295	9,592,428	-	10,230,723
Buying transactions	-	-	300,575	4,738,474	-	5,039,049
Selling transactions	-	-	337,720	4,853,954	-	5,191,674
Transactions for cash flow hedge (II)	382,570	147,976	1,450,252	8,133,294	2,788,988	12,903,080
Buying transactions	241,709	96,967	828,168	3,956,966	1,265,640	6,389,450
Selling transactions	140,861	51,009	622,084	4,176,328	1,523,348	6,513,630
Transactions for foreign net investment hedge (III)	-	-	-	-	-	-
Buying transactions	-	-	-	-	-	-
Selling transactions	-	-	-	-	-	-
A. Total derivative financial instruments held for hedging (I+II+III)	382,570	147,976	2,088,547	17,725,722	2,788,988	23,133,803
Derivative transactions held for trading						
Trading transactions (I)	69,379,543	52,864,274	42,524,866	12,599,410	-	177,368,093
Forward foreign currency transactions – buy	10,300,482	16,094,190	7,377,152	38,747	-	33,810,571
Forward foreign currency transactions – sell	10,086,855	18,657,269	7,078,834	51,139	-	35,874,097
Swap transactions- buy	22,024,797	5,560,142	5,421,190	5,958,762	-	38,964,891
Swap transactions – sell	21,888,711	6,239,400	5,621,668	6,467,879	-	40,217,658
Foreign currency options – buy	2,544,355	3,166,297	8,905,205	42,988	-	14,658,845
Foreign currency options – sell	2,534,343	3,146,976	8,120,817	39,895	-	13,842,031
Foreign currency futures – buy	-	-	-	-	-	-
Foreign currency futures – sell	-	-	-	-	-	-
Interest rate derivatives (II)	36,904,476	64,577,233	126,517,667	126,078,008	1,016,769	355,094,153
Interest rate swap - buy	18,503,673	32,310,994	63,303,911	63,093,220	459,322	177,671,120
Interest rate swap - sell	18,400,803	32,266,239	63,213,756	62,984,788	557,447	177,423,033
Interest rate options - buy	-	-	-	-	-	-
Interest rate options - sell	-	-	-	-	-	-
Securities options - buy	-	-	-	-	-	-
Securities options - sell	-	-	-	-	-	-
Interest futures - buy	-	-	-	-	-	-
Interest futures - sell	-	-	-	-	-	-
Other trading derivative transactions (III)	-	-	-	-	-	-
B. Total trading derivative transactions (I+II+III)	106,284,019	117,441,507	169,042,533	138,677,418	1,016,769	532,462,246
Derivative transaction total (A+B)	106,666,589	117,589,483	171,131,080	156,403,140	3,805,757	555,596,049

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VI. Explanations on unconsolidated liquidity risk management, liquidity coverage ratio and net stable funding ratio (continued)

Prior period	Up to 1 month	1 – 3 months	3 – 12 months	1 – 5 Years	5 years and over	Total
Derivative financial instruments held for hedging						
Transactions for fair value hedge (I)	-	-	-	-	-	-
Buying transactions	-	-	-	-	-	-
Selling transactions	-	-	-	-	-	-
Transactions for cash flow hedge (II)	4,103	15,705	112,967	315,790	-	448,565
Buying transactions	3,120	11,363	71,353	163,552	-	249,388
Selling transactions	983	4,342	41,614	152,238	-	199,177
Transactions for foreign net investment hedge (III)	-	-	-	-	-	-
Buying transactions	-	-	-	-	-	-
Selling transactions	-	-	-	-	-	-
A. Total derivative financial instruments held for hedging (I+II+III)	4,103	15,705	112,967	315,790	-	448,565
Derivative transactions held for trading						
Trading transactions (I)	80,886,725	79,183,449	62,461,351	468,583	-	223,000,108
Forward foreign currency transactions – buy	8,741,792	10,925,136	17,501,370	42,831	-	37,211,129
Forward foreign currency transactions – sell	8,636,273	10,578,864	15,945,877	34,280	-	35,195,294
Swap transactions- buy	27,528,160	24,294,418	7,694,977	79,938	-	59,597,493
Swap transactions – sell	27,507,834	25,027,670	8,250,106	311,534	-	61,097,144
Foreign currency options – buy	4,239,076	4,201,434	6,517,317	-	-	14,957,827
Foreign currency options – sell	4,233,590	4,155,927	6,551,704	-	-	14,941,221
Foreign currency futures – buy	-	-	-	-	-	-
Foreign currency futures – sell	-	-	-	-	-	-
Interest rate derivatives (II)	17,502,125	48,320,869	49,532,018	26,814,416	1,973,358	144,142,786
Interest rate swap - buy	8,703,114	24,157,664	24,782,239	13,289,869	857,276	71,790,162
Interest rate swap - sell	8,799,011	24,163,205	24,749,779	13,524,547	1,116,082	72,352,624
Interest rate options - buy	-	-	-	-	-	-
Interest rate options - sell	-	-	-	-	-	-
Securities options - buy	-	-	-	-	-	-
Securities options - sell	-	-	-	-	-	-
Interest futures - buy	-	-	-	-	-	-
Interest futures - sell	-	-	-	-	-	-
Other trading derivative transactions (III)	-	-	-	-	-	-
B. Total trading derivative transactions (I+II+III)	98,388,850	127,504,318	111,993,369	27,282,999	1,973,358	367,142,894
Derivative transaction total (A+B)	98,392,953	127,520,023	112,106,336	27,598,789	1,973,358	367,591,459

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VII. Explanations on unconsolidated leverage ratio

Leverage ratio table prepared in accordance with the communiqué "Regulation on Measurement and Assessment of Leverage Ratios of Banks" published in the Official Gazette no.28812 dated 5 November 2013 is presented below. As of 31 December 2024, the Bank's leverage ratio is calculated by taking average of end of month leverage ratios for the last three months is 7.48% (31 December 2023: 7.19%). This ratio is above the minimum ratio of 3%. While the capital increased by 30% mainly as a result of increase in net profits, total risk amount increased by 25% compared to the prior period. Therefore, the current period leverage ratio increased by 29 basis points compared to prior period.

Information on unconsolidated leverage ratio

	Current period (*)	Prior period (*)
On-balance sheet items		
<i>On-balance sheet exposures (excluding derivatives and credit derivatives including collateral)</i>	175,111,610	143,770,399
<i>Asset deducted from core capital</i>	(1,763,315)	(542,235)
The total amount of risk on-balance sheet exposures	173,348,295	143,228,164
Derivative financial instruments and credit derivative exposures		
<i>Replacement cost associated with derivative financial instruments and credit derivatives</i>	2,981,094	1,968,855
<i>The potential credit risk amount of derivative financial instruments and credit derivatives</i>	2,354,535	5,530,927
The total risk amount of derivative financial instruments and credit derivatives	5,335,629	7,499,782
Securities or commodity guaranteed financing transactions		
<i>Risk amount of securities or commodity collateral financing transactions (excluding on balance sheet items)</i>	613,161	285,995
<i>Risk amount of exchange brokerage operations</i>	-	-
The total risk amount of securities or commodity collateral financing transactions	613,161	285,995
Off-balance sheet items		
<i>Gross notional amount for off-balance sheet items</i>	61,817,867	41,938,749
<i>Adjustments for conversion to credit equivalent amounts</i>	-	-
The total amount of risk for off-balance sheet items	61,817,867	41,938,749
Capital and total exposures		
Core capital	18,044,903	13,873,543
Total exposures	241,114,952	192,952,690
Leverage ratio		
Leverage ratio	7.48	7.19

(*) The amounts in the table represents the average of last three months.

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VIII. Explanations on presentation of financial assets and liabilities at their fair values

1. In the current and the prior period, the fair values of financial assets and liabilities are calculated as stated below.

The fair value of financial assets at fair value through other comprehensive income and financial assets measured at amortised cost (financial assets available for sale in the prior period) are determined based on market prices.

The fair value of the loans with fixed interest rates is determined by the discounted cash flows using the current market interest rates. For the loans with floating interest rates, the fair value is determined by discounted cash flows using the market interest rate, taking into account the repricing date of the loan.

The fair value of demand deposit represents the carrying value. The fair values of time deposits and funds are calculated by the discounted cash flows using the current market interest rates.

The fair value of funds borrowed from other financial institutions with fixed interest rates are determined by discounted cash flows using the current market interest rates. For funds with floating interest rates, it is determined by discounted cash flows using the market interest rate, taking into account the repricing date of the borrowing.

Carrying value of miscellaneous payables represents their fair value.

2. The following table summarizes the carrying values and fair values of financial assets and liabilities.

	Carrying value	Fair value	Carrying value	Fair value
	Current period	Current period	Prior period	Prior period
Financial assets	122,447,589	119,679,448	98,129,390	95,516,489
Money market placements	20,273,676	20,247,857	8,508,257	8,499,891
Due from banks	1,746,421	1,719,610	1,405,374	1,389,508
Financial assets at fair value through other comprehensive income	5,340,620	5,340,620	3,814,063	3,814,063
Financial assets measured at amortised cost	12,679,500	11,466,381	9,969,354	9,356,681
Loans	82,407,372	80,904,980	74,432,342	72,456,346
Financial liabilities	150,374,243	144,488,418	115,835,206	110,294,304
Bank deposits	6,256,033	6,242,911	3,679,249	3,674,379
Other deposits	124,845,694	118,925,218	96,669,127	90,972,728
Funds borrowed	11,318,030	11,355,789	13,735,664	13,897,375
Money market borrowings	818,872	818,721	183,778	182,434
Securities issued (*)	5,128,095	5,138,260	-	-
Miscellaneous payables	2,007,519	2,007,519	1,567,388	1,567,388

(*) Includes securities issued as subordinated loan presented under subordinated debts in balance sheet.

3. Hierarchy of valuation techniques which establishes basis for fair value calculation of financial assets and liabilities:

Level 1: Quoted market prices (non-adjusted) for identical assets or liabilities

Level 2: Directly (by way of prices) or indirectly (derived from prices) data for the assets or liabilities, other than quoted prices in the Level 1

Level 3: Data not based on observable data regarding assets or liabilities

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VIII. Explanations on presentation of financial assets and liabilities at their fair values (continued)

Fair value hierarchy of the financial assets and liabilities of the Bank carried at fair value in financial statements as of 31 December 2024 and 31 December 2023 is presented in the table below:

Current period	Level 1	Level 2	Level 3	Total
Total assets	7,013,777	2,585,438	114,514	9,713,729
Financial assets at fair value through profit or loss	1,787,671	2,395,514	-	4,183,185
Government debt securities	1,787,097	-	-	1,787,097
Trading derivative financial assets	-	2,395,514	-	2,395,514
Equity instruments	574	-	-	574
Other marketable securities	-	-	-	-
Financial assets at fair value through other comprehensive income	5,226,106	-	114,514	5,340,620
Equity instruments	-	-	114,514	114,514
Government debt securities	5,226,106	-	-	5,226,106
Hedging derivative financial assets	-	189,924	-	189,924
Cash flow hedges	-	189,924	-	189,924
Fair value hedges	-	-	-	-
Total liabilities	-	4,862,433	-	4,862,433
Trading derivative financial liabilities	-	4,718,486	-	4,718,486
Hedging derivative financial liabilities	-	143,947	-	143,947
Cash flow hedges	-	9,245	-	9,245
Fair value hedges	-	134,702	-	134,702
Prior period	Level 1	Level 2	Level 3	Total
Total assets	4,189,537	1,849,206	66,629	6,105,372
Financial assets at fair value through profit or loss	442,103	1,808,239	-	2,250,342
Government debt securities	441,792	-	-	441,792
Trading derivative financial assets	-	1,808,239	-	1,808,239
Equity instruments	311	-	-	311
Other marketable securities	-	-	-	-
Financial assets at fair value through other comprehensive income	3,747,434	-	66,629	3,814,063
Equity instruments	-	-	66,629	66,629
Government debt securities	3,747,434	-	-	3,747,434
Hedging derivative financial assets	-	40,967	-	40,967
Cash flow hedges	-	40,967	-	40,967
Total liabilities	-	2,219,863	-	2,219,863
Trading derivative financial liabilities	-	2,219,863	-	2,219,863
Hedging derivative financial liabilities	-	-	-	-
Cash flow hedges	-	-	-	-

There are no transfers between the 1st and the 2nd levels as of 31 December 2024 and 31 December 2023. The movement table of financial assets at Level 3 is presented below.

	Current period	Prior period
Balance at the end of the prior period	66,629	65,905
Purchases	13,614	-
Redemption / sale	-	-
Valuation difference	34,271	724
Transfers	-	-
Balance at the end of the current period	114,514	66,629

IX. Explanations on the transactions carried out on behalf and account of other persons and fiduciary transactions

The Bank performs purchase, sale, custody, and fund management services on behalf of its customers, and information about these transactions are shown in the off-balance sheet statement.

The Bank has no trust transactions.

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X. Explanations on unconsolidated risk management

Notes and explanations in this section have been prepared in accordance with the "Communiqué on Disclosures about Risk Management to be announced to Public by Banks", promulgated in the Official Gazette, no. 29511, dated 23 October 2015 and became effective as of 31 March 2016. Due to usage of standard approach for credit risk in the calculation of capital adequacy by the Bank, tables required by Internal Rating Based approach ("IRB") are not presented.

1. General explanations on Bank's risk management and risk weighted assets

a. Bank's risk management approach

Bank's risk management strategy and activities have been formed under the responsibility of the Board of Directors. The risk management strategy applied in the Bank is based on three lines of defence model.

First Line of Defence

Business units are the first line of defence and primarily responsible for performance, operation, compliance and control of the risks affecting the business line.

Second Line of Defence

Risk Management, Financial Control and Asset Liability Management and Legal functions, which are the second line of defence, support the first line of defence in terms of implementation, training, advising, monitoring and reporting.

Risk Management is responsible for identifying, measuring, monitoring, controlling and reporting risks at corporate level. Bank's Risk Management consists of Financial Risk Management, Non-Financial Risk Management, Compliance departments and reports to the Risk Committee. Financial Risk Management includes Market Risk Management, Validation, Credit Risk Control, Risk&Capital and Reporting departments.

Third Line of Defence

Internal Audit Department is the third line of defence. Internal Audit Department carries out both risks based and general audits. In addition, Internal Audit Department is responsible for reviewing and ensuring the integrity of the whole governance structure including risk governance, and presence, effectiveness and implementation of policies and procedures.

According to this strategy, these lines of defence carry out their activities through certain decision making committees such as the Executive Committee, Asset Liability Committee, Credit Committee and Non-Financial Risk Committee. External auditors and relevant Regulators and Regulating Entities are considered as third line of defence.

Senior Management and Board of Directors are notified on the market risks monthly or on a more frequent basis; and this notification consists of balance sheet developments, market developments, assessment of the risks incurred despite the determined risk appetite and other risk developments. Furthermore, credit risk reports focusing on development of performing and non-performing loan portfolios, rating distribution of portfolios, transitions and trends of ratings, concentration risks, business units and product based risk parameters and risk appetite indicators are closely followed.

In addition to measurement and assessment of the risks under normal market conditions, stress tests under the scope of ICAAP and also for internal purposes are performed to evaluate the possible risks under adverse market conditions. In this stress test, all kinds of financial risks that can be faced by the Bank are taken into account and evaluated under adverse and extremely adverse scenarios. Also reverse stress test is performed which defines the conditions that the Bank's regulatory limits is breached. The Bank prepares stress test reports within the context of ICAAP on a consolidated basis as per the guideline, numbered 6656, dated 14 January 2016 on the Stress Test to be Used in Banks' Capital and Liquidity Planning. The Stress Test provides a prospective perspective in possible adverse incidents or adverse situations.

It is aimed that all important risks are defined and relations between them are established in order to perform sensitivity analyses in the most effective manner throughout the Bank. Accordingly, the Bank performs the stress test together with all relevant units in a consolidated manner.

Detailed explanations on the Bank's risk appetite and credit risk can be found in section "Credit Risk", and detailed explanations on market risk can be found in section "Market Risk" while detailed explanations on operational risk can be found in section "Operational Risk".

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X. Explanations on unconsolidated risk management (continued)

b. Overview of risk weighted amounts

	Risk weighted amount		Minimum capital requirement
	Current period	Prior period	Current period
Credit risk (excluding counterparty credit risk) (CCR)	87,002,271	70,638,235	6,960,182
Standardized approach (SA)	87,002,271	70,638,235	6,960,182
Internal rating-based (IRB) approach	-	-	-
Counterparty credit risk	3,342,666	6,211,690	267,413
Standardized approach for counterparty credit risk (SA-CCR)	3,342,666	6,211,690	267,413
Internal model method	-	-	-
Basic risk weight approach to internal models equity position in the banking account	-	-	-
Investments made in collective investment companies – look-through approach	-	-	-
Investments made in collective investment companies – mandate-based approach	-	-	-
Investments made in collective investment companies - 1250% weighted risk approach	-	-	-
Settlement Risk	-	-	-
Securitization positions in banking accounts	-	-	-
IRB ratings-based approach (RBA)	-	-	-
IRB Supervisory Formula Approach (SFA)	-	-	-
SA/simplified supervisory formula approach	-	-	-
Market risk	3,699,988	2,219,863	295,999
Standardized approach (SA)	3,699,988	2,219,863	295,999
Internal model approaches (IMM)	-	-	-
Operational risk	10,259,371	8,639,158	820,750
Basic indicator approach	10,259,371	8,639,158	820,750
Standard approach	-	-	-
Advanced measurement approach	-	-	-
The amount of the discount threshold under the equity (subject to a 250% risk weight)	-	-	-
Floor adjustment	-	-	-
Total	104,304,296	87,708,946	8,344,344

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X. Explanations on unconsolidated risk management (continued)

2. Linkages between financial statements and risk amounts

a. Differences and linkage between scope of accounting consolidation and regulatory consolidation

Current period	Revalued amount in accordance with TAS					
	Revalued amount in accordance with TAS as reported in published financial statements	Subject to credit risk	Subject to counterparty credit risk	Securitization positions	Subject to market risk	Not subject to capital requirements or subject to deduction from capital
Assets						
Cash and balances with Central Bank	39,344,125	39,344,125	-	-	-	-
Financial assets at fair value through profit and loss	4,183,185	-	2,395,514	-	4,183,185	-
Banks	1,746,421	1,746,421	-	-	-	-
Money market placements	20,273,676	20,273,676	-	-	-	-
Financial assets measured at fair value through other comprehensive income	5,340,620	5,340,620	-	-	-	-
Financial assets measured at amortised cost	12,681,010	12,681,010	-	-	-	-
Expected credit losses (-)	13,738	-	-	-	-	13,738
Loans (Net)	82,405,862	82,987,348	-	-	-	(579,848)
Loans	82,656,138	82,656,138	-	-	-	1,638
Lease receivables	-	-	-	-	-	-
Factoring receivables	-	-	-	-	-	-
Non performing receivables	1,006,419	1,006,419	-	-	-	-
Expected credit losses (-)	1,256,695	675,209	-	-	-	581,486
Associates (net)	-	-	-	-	-	-
Subsidiaries (net)	2,791,511	2,791,511	-	-	-	-
Joint ventures (business partnership) (net)	-	-	-	-	-	-
Derivative financial assets held for hedging	189,924	-	189,924	-	-	-
Tangible assets (net)	3,332,897	3,279,434	-	-	-	53,463
Intangible assets (net)	2,329,478	-	-	-	-	2,292,478
Investment property (net)	-	-	-	-	-	-
Tax asset	1,740,980	1,740,980	-	-	-	-
Property and equipment held for sale and related to discontinued operations (net)	33,368	33,368	-	-	-	-
Other assets	3,207,482	3,232,240	-	-	-	(24,758)
Total assets	179,586,801	173,450,733	2,585,438	-	4,183,185	1,727,597
Liabilities						
Deposit	131,101,727	-	-	-	-	131,101,727
Derivative financial liabilities at fair value through profit or loss	4,853,188	-	-	-	-	4,718,487
Loans received	11,318,030	-	-	-	-	11,318,030
Money market funds	818,872	-	818,872	-	-	-
Securities issued (*)	5,128,095	-	-	-	-	5,128,095
Funds	-	-	-	-	-	-
Factoring payables	-	-	-	-	-	-
Lease payables	136,360	-	-	-	-	136,360
Derivative financial liabilities at fair value through other comprehensive income	9,245	-	-	-	-	9,245
Provisions	1,419,660	390,810	-	-	-	935,677
Tax liability	1,095,840	-	-	-	-	1,095,840
Liabilities for assets held for sale and assets of discontinued operations (net)	-	-	-	-	-	-
Subordinated debt	-	-	-	-	-	-
Other liabilities	3,674,576	-	-	-	-	3,674,576
Shareholders' equity	20,031,208	-	-	-	-	20,030,467
Total liabilities	179,586,801	390,810	818,872	-	-	178,148,504

(*) Includes securities issued as subordinated loan presented under subordinated debts in balance sheet.

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X. Explanations on unconsolidated risk management (continued)

Prior period	Revalued amount in accordance with TAS					
	Revalued amount in accordance with TAS as reported in published financial statements	Subject to credit risk	Subject to counterparty credit risk	Securitization positions	Subject to market risk	Not subject to capital requirements or subject to deduction from capital
Assets						
Cash and balances with Central Bank	26,957,378	26,957,378	-	-	-	-
Financial assets at fair value through profit and loss	2,250,342	-	1,808,239	-	2,250,342	-
Banks	1,405,374	1,405,374	-	-	-	-
Money market placements	8,508,257	2,334,827	6,173,430	-	-	-
Financial assets measured at fair value through other comprehensive income	3,814,063	3,814,063	-	-	-	-
Financial assets measured at amortised cost	9,970,600	9,970,600	-	-	-	-
Expected credit losses (-)	10,197	-	-	-	-	10,197
Loans (Net)	74,431,096	75,130,114	-	-	-	(695,729)
Loans	74,873,506	74,873,506	-	-	-	3,289
Lease receivables	-	-	-	-	-	-
Factoring receivables	-	-	-	-	-	-
Non performing receivables	973,571	973,571	-	-	-	-
Expected credit losses (-)	1,415,981	716,963	-	-	-	699,018
Associates (net)	-	-	-	-	-	-
Subsidiaries (net)	2,182,061	2,182,061	-	-	-	-
Joint ventures (business partnership) (net)	-	-	-	-	-	-
Derivative financial assets held for hedging	40,967	-	40,967	-	-	-
Tangible assets (net)	758,536	696,391	-	-	-	62,145
Intangible assets (net)	1,043,982	-	-	-	-	1,023,361
Investment property (net)	2,729	-	-	-	-	2,729
Tax asset	2,321,448	2,587,211	-	-	-	(265,763)
Property and equipment held for sale and related to discontinued operations (net)	-	-	-	-	-	-
Other assets	6,843,609	6,862,736	-	-	-	(19,127)
Total assets	140,520,245	131,940,755	8,022,636	-	2,250,342	97,419
Liabilities						
Deposit	100,348,376	-	-	-	-	100,348,376
Derivative financial liabilities at fair value through profit or loss	2,219,863	-	-	-	-	2,219,863
Loans received	13,735,664	-	-	-	-	13,735,664
Money market funds	183,778	-	183,778	-	-	-
Securities issued	-	-	-	-	-	-
Funds	-	-	-	-	-	-
Factoring payables	-	-	-	-	-	-
Lease payables	212,310	-	-	-	-	212,310
Derivative financial liabilities at fair value through other comprehensive income	-	-	-	-	-	-
Provisions	927,295	245,029	-	-	-	564,594
Tax liability	257,919	-	-	-	-	257,919
Liabilities for assets held for sale and assets of discontinued operations (net)	-	-	-	-	-	-
Subordinated debt	-	-	-	-	-	-
Other liabilities	7,766,982	-	-	-	-	7,766,982
Shareholders' equity	14,868,058	-	-	-	-	14,867,442
Total liabilities	140,520,245	245,029	183,778	-	-	139,973,150

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X. Explanations on unconsolidated risk management (continued)

b. Main differences between risk amounts and the amounts revalued in accordance with TAS financial statement

Current period	Total	Subject to credit risk	Securitization positions	Subject to counterparty credit risk	Subject to market risk (*)
Assets carrying value in accordance with TAS	177,859,204	173,450,733	-	2,585,438	4,183,185
Liabilities carrying value in accordance with TAS under scope of regulatory consolidation	1,438,295	390,810	-	818,872	-
Total net amount under scope of regulatory consolidation	176,420,909	173,059,923	-	1,766,566	4,183,185
Off-balance sheet amount	41,860,733	18,485,581	-	3,794,540	-
Differences due to risk mitigation	-	(328,503)	-	(818,528)	-
Differences due to different netting rules	-	-	-	-	-
Differences due to consideration of provisions	-	-	-	-	-
Differences due to the applications of the Bank	-	-	-	-	(483,197)
Effect of fix exchange rate (**)	-	(13,031,477)	-	-	-
Exposure amounts	-	178,185,524	-	4,742,578	3,699,988

(*) The amounts of financial instruments, which are measured according to TAS and included in trading accounts within the scope of the "Regulation on Measurement and Assessment of Capital Adequacy Ratios of Banks", is represented in "Subject to market risk framework" column are presented.

(**) It shows the fix exchange rate effect used in the calculation of credit risk within the scope of the BRSA's letter dated 28 April 2022.

Prior period	Total	Subject to credit risk	Securitization positions	Subject to counterparty credit risk	Subject to market risk (*)
Assets carrying value in accordance with TAS	140,422,826	131,940,755	-	8,022,636	2,250,342
Liabilities carrying value in accordance with TAS under scope of regulatory consolidation	544,364	245,029	-	183,778	-
Total net amount under scope of regulatory consolidation	139,878,462	131,695,726	-	7,838,858	2,250,342
Off-balance sheet amount	30,602,074	9,544,119	-	7,139,942	-
Differences due to risk mitigation	-	(474,188)	-	(6,357,208)	-
Differences due to different netting rules	-	-	-	-	-
Differences due to consideration of provisions	-	-	-	-	-
Differences due to the applications of the Bank	-	-	-	-	(30,479)
Effect of fix exchange rate (**)	-	(14,740,700)	-	-	-
Exposure amounts	-	126,024,957	-	8,621,592	2,219,863

(*) The amounts of financial instruments, which are measured according to TAS and included in trading accounts within the scope of the "Regulation on Measurement and Assessment of Capital Adequacy Ratios of Banks", is represented in "Subject to market risk framework" column are presented.

(**) It shows the fix exchange rate effect used in the calculation of credit risk within the scope of the BRSA's letter dated 28 April 2022.

c. Explanations on differences between carrying values in financial statements and risk amounts in capital adequacy calculation of assets and liabilities:

There are no material differences between the carrying values in financial statements and the risk amounts in capital adequacy calculation of assets and liabilities.

3. Explanations about credit risk

3.1. General information on credit risk

a. General qualitative information on credit risk

Bank's Credit Risk Management reports to the Risk Committee. In order to carry out its functions and responsibilities more effectively, Credit Risk Management is structured under Credit Risk Control, Risk&Capital and Reporting Department. Credit Risk Control, Risk& Capital and Reporting Department is responsible for developing, monitoring and sustaining the models to be used in Internal Ratings Based (IRB) method and TFRS 9 calculations and the integration of rating models in the bank systems. Additionally, the department is responsible to form ICAAP process to carry out stress testing, IRB calculations.

Risk appetite expresses the total risk level assumed by the Bank in order to realise its strategies. To ensure that the Bank's risk appetite is equal to or below risk capacity, in general there is a buffer between the risk capacity and risk appetite. Bank's risk appetite is compatible with the main shareholder's risk appetite, and the Bank pays sufficient attention to protect the interests of all stakeholders such as deposit holders and legal regulators.

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X. Explanations on unconsolidated risk management (continued)

Risk appetite is determined according to the risk identification and assessment results, the risk capacity formed by the Bank considering the legal qualitative and quantitative limits and similarly the Bank's risk management and control abilities. If it is possible to implement, risk appetite indicators are approved by the management units (committees) formed for the relevant risk type. Both the risk appetite structure and risk appetite indicators are revised by the Risk Committee and presented by the Risk Committee to the Board of Directors. The approval authority for risk appetite structure and indicators is the Board of Directors.

Bank's risk profile is regularly measured, monitored in comparison with the risk appetite and reported to the Board of Directors and certain senior committees. Under credit risk, general condition of the credit portfolio, non-performing loans, risk appetite indicators, firm and group concentrations, legal credit ratios, development of capital adequacy ratio, development and distribution of ratings based on business units, rating and risk transitions, Probability of Default ("PD"), loss given default ("LGD") and Exposure at Default ("EAD") parameters are followed. Reports prepared in scope of ICAAP study are presented to the senior management and Board of Directors before they are sent to the BRSA.

Many rating models and scorecards are used in different processes such as allocation, monitoring, collection, pricing, etc. for the purpose of managing credit risk. With these models, internal data sources and external data sources (such as CB credit risk and limit report, Credit Bureau) are used and creditworthiness of new clients is measured; and development of the existing credit portfolio is closely monitored. Performance of models is regularly monitored by Model Risk Management team under Financial Risk Management in addition to the teams developing the models.

b. Credit quality of assets

Current period	Gross carrying values of (according to TAS)		Provisions / amortization and impairment	Net values
	Defaulted	Non-defaulted		
Loans	1,006,419	82,656,138	1,255,185	82,407,372
Debt securities (*)	-	17,907,116	2,251	17,904,865
Off-balance sheet exposures	1,463,165	47,121,453	483,983	48,100,635
Total	2,469,584	147,684,707	1,741,419	148,412,872

(*) Includes provisions accounted under equity for financial assets at fair value through other comprehensive income.

Prior period	Gross carrying values of (according to TAS)		Provisions / amortization and impairment	Net values
	Defaulted	Non-defaulted		
Loans	973,571	74,873,506	1,414,735	74,432,342
Debt securities (*)	-	13,718,034	1,862	13,716,172
Off-balance sheet exposures	1,286,224	40,720,838	362,700	41,644,362
Total	2,259,795	129,312,378	1,779,297	129,792,876

(*) Includes provisions accounted under equity for financial assets at fair value through other comprehensive income.

c. Changes in stock of defaulted loans and debt securities

	Current period	Prior period
Defaulted loans and debt securities at the end of the previous reporting period	973,571	1,370,339
Loans and debt securities defaulted since the last reporting period	425,042	151,120
Transferred to non-defaulted status	-	-
Amounts written off (*)	(54,349)	(209,020)
Other changes (**)	(337,845)	(338,868)
Defaulted loans and debt securities at the end of the reporting period	1,006,419	973,571

(*) Specific provisions for undrawn non-cash loans are not included in the table. Amounts written off also includes the NPL sale of the Bank amounting to TL 52,315 portfolio (31 December 2023: TL 204,403).

(**) Collections within the period have included "Other changes" account.

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X. Explanations on unconsolidated risk management (continued)

ç. Additional explanations on the creditworthiness of assets

Definitions of overdue and provision set aside are presented in Section Four II – Explanations on Credit Risk footnote.

Definitions of the methods used in determining the provision amounts:

The methods used are presented in the footnote of Section Three VIII – Explanations on impairment in financial assets.

Definitions of the restructured receivables:

The Bank can restructure the first and second group loans and other receivables, as well as non-performing loans and receivables. All loan products are considered together and a single restructuring protocol is formed; according to the legislation and general economic situation, variable or fixed interest terms are provided to enhance customers' ability to repay the loan.

Breakdown of receivables according to geographical regions, sector and remaining maturity:

Breakdown of receivables according to geographical regions, sector and remaining maturity is presented in footnote in Section Four II – Explanations on credit risk.

Receivable amounts for which provisions are set aside on geographical regions and sectors and amounts written off with the provisions:

Breakdown of receivables according to geographical regions

	Current period		Prior period	
	Non-performing loans (**)	Specific provision	Non-performing loans (**)	Specific provision
Domestic	1,006,408	675,201	973,565	716,957
EU Countries	-	-	-	-
OECD Countries (*)	-	-	-	-
Off-Shore Banking Regions	-	-	-	-
USA, Canada	-	-	-	-
Other countries	11	8	6	6
Total	1,006,419	675,209	973,571	716,963

(*) OECD countries other than EU countries, USA and Canada.

(**) Non-cash loans are not included.

Sectoral receivables and related provisions are presented in Section Four - II. Explanations on credit risk disclosure.

Aging of overdue exposures

	Current period	Prior period
Overdue 31 – 60 days	164,867	67,676
Overdue 61 – 90 days	58,192	22,480
Total	223,059	90,156

Breakdown of restructured receivables by whether or not provisions are allocated

	Current period	Prior period
Loans structured from standard loans and other receivables	-	-
Loans structured from closely monitored loans and other receivables	181,061	155,688
Loans restructured from non-performing loans	10,644	41,980

The Bank classifies all of its loans and receivables as stage 2 if they meet the restructured loan conditions while being in the performing loan portfolio according to the "Provision Regulation". Restructured loans classified as stage 2 are subject to stage 2 expected credit losses while restructured loans classified as non-performing loans are subject to specific provision.

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X. Explanations on unconsolidated risk management (continued)

Information on expected credit loss

	Stage 1	Stage 2	Stage 3	Total
Opening balance (*)	463,588	383,042	961,992	1,808,622
Additional provision during the period	328,057	188,978	394,286	911,321
Disposals (-)	(322,890)	(212,096)	(245,322)	(780,308)
Amounts written off (-)	-	-	(44,993)	(44,993)
Transferred to Stage 1	-	(55,592)	-	(55,592)
Transferred to Stage 2	(25,236)	-	56	(25,180)
Transferred to Stage 3	(24,541)	(9,415)	-	(33,956)
Ending balance	418,978	294,917	1,066,019	1,779,914

(*) Includes provisions for non-cash loans and provisions accounted under equity for financial assets at fair value through other comprehensive income.

3.2. Credit risk mitigation techniques

a. Qualitative disclosure requirements related to credit risk mitigation techniques

The Bank pays specific attention to the fact that the risk is completely covered by the collaterals and the easiness of collateral conversion into cash in case of default. In addition, the primary repayment source of loan is the cash flows from operations. Therefore, the financial status and retrospective and prospective cash flows of the firms to which credit proposal is made (the debtor) are analysed with due care during loan disbursement.

Collaterals in the Bank are divided into two groups as financial collaterals and guarantees. Collaterals are considered as allowed by the related regulations.

The Bank monitors up to date value of the collaterals by type. As a general principle, the Bank revises all collaterals at least once a year. For the firms which still have a credit risk, the existing collaterals are not released unless the guarantees in the credit notification are fully ensured or risk amount is decreased.

The Bank makes the assessment according to the latest expert value in the real estate guarantees taken as a real property.

3.2. Credit risk mitigation techniques

The Bank's credit risk exposure and mitigation techniques used in order to reduce the exposure level are taken into account according to the principles stated in the related regulation. The Bank applies credit risk mitigation according to the comprehensive method that includes risk mitigation calculations considering the volatility-adjusted values of financial collaterals. The standardized risk weights are applied to the rest of the loans and receivables that remained unprotected after credit risk mitigation techniques. Financial collaterals that are composed of cash or similar assets and instruments of a high credit quality as well as real estate mortgages have been used in credit risk mitigation.

b. Credit risk mitigation techniques

	Exposures unsecured carrying amount as per TAS	Exposures secured by collateral	Collateralized amount of exposures secured by collaterals	Exposures secured by financial guarantees	Collateralized amount of exposures secured by financial guarantees	Exposures secured by credit derivatives	Collateralized amount of exposures secured by credit derivatives
Current period							
Loans (*)	75,620,104	6,787,268	5,348,704	3,291	2,393	-	-
Debt securities (*)	17,904,865	-	-	-	-	-	-
Total	93,524,969	6,787,268	5,348,704	3,291	2,393	-	-
Of which defaulted	1,006,419	-	-	-	-	-	-

(*) Stage 1 and Stage 2 expected credit losses are deducted from the related balance sheet amounts according to regulation.

	Exposures unsecured carrying amount as per TAS	Exposures secured by collateral	Collateralized amount of exposures secured by collaterals	Exposures secured by financial guarantees	Collateralized amount of exposures secured by financial guarantees	Exposures secured by credit derivatives	Collateralized amount of exposures secured by credit derivatives
Prior period							
Loans (*)	68,585,792	5,846,550	4,572,654	22,305	19,027	-	-
Debt securities (*)	13,716,172	-	-	-	-	-	-
Total	82,301,964	5,846,550	4,572,654	22,305	19,027	-	-
Of which defaulted	973,571	-	-	-	-	-	-

(*) Stage 1 and Stage 2 expected credit losses are deducted from the related balance sheet amounts according to regulation.

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X. Explanations on unconsolidated risk management (continued)

c. Qualitative disclosures on Banks' use of external credit ratings under the standardised approach for credit risk

Explanations are disclosed in Section Four II - Explanations on credit risk disclosures.

ç. Credit risk exposure and credit risk mitigation effects

Current period	Exposures before CCF and CRM		Exposures post-CCF and CRM		RWA and RWA density	
	On-balance sheet amount	Off-balance sheet amount	On-balance sheet amount	Off-balance sheet amount	RWA	RWA density
Risk classes						
Claims on sovereigns and Central Banks	71,492,790	34,682	71,495,183	34,682	-	-
Claims on regional governments or local authorities	3,700,781	-	3,700,781	-	828,282	22.38%
Claims on administrative bodies and other non-commercial undertakings	-	-	-	-	-	-
Claims on multilateral development banks	-	-	-	-	-	-
Claims on international organizations	-	-	-	-	-	-
Claims on banks and intermediary institutions	3,650,189	7,934,294	2,935,542	3,762,090	1,163,252	17.37%
Claims on corporates	42,969,596	24,636,742	42,896,136	15,669,089	47,859,269	81.72%
Claims on retails	17,422,170	11,732,974	17,224,800	1,020,008	14,019,825	76.84%
Claims secured by residential property	3,041,706	-	3,041,706	-	1,064,597	35.00%
Claims secured by commercial property	1,230,943	96,200	1,230,942	39,262	687,792	54.15%
Past due loans	312,313	-	312,313	-	255,405	81.78%
Higher risk categories decided by the Board	8,280,842	-	8,280,422	-	12,073,396	145.81%
Secured by mortgages	-	-	-	-	-	-
Short-term claims and short-term corporate claims on banks and intermediary institutions	-	-	-	-	-	-
Undertakings for collective investments in mutual funds	-	-	-	-	-	-
Other receivables	8,778,783	24,663	8,778,785	4,933	6,549,025	74.56%
Equity securities	2,501,428	-	2,501,428	-	2,501,428	100.00%
Total	163,381,541	44,459,555	162,398,038	20,530,064	87,002,271	47.56%

Prior period	Exposures before CCF and CRM		Exposures post-CCF and CRM		RWA and RWA density	
	On-balance sheet amount	Off-balance sheet amount	On-balance sheet amount	Off-balance sheet amount	RWA	RWA density
Risk classes						
Claims on sovereigns and Central Banks	38,527,164	58,676	38,540,877	58,676	-	-
Claims on regional governments or local authorities	754,191	-	754,191	-	975,037	129.28%
Claims on administrative bodies and other non-commercial undertakings	-	-	-	-	-	-
Claims on multilateral development banks	-	-	-	-	-	-
Claims on international organizations	-	-	-	-	-	-
Claims on banks and intermediary institutions	15,817,361	13,404,111	9,474,288	2,482,383	1,153,904	9.65%
Claims on corporates	41,895,808	13,892,583	41,783,153	7,573,147	34,425,886	69.75%
Claims on retails	10,499,895	4,809,874	10,378,562	703,816	8,386,841	75.68%
Claims secured by residential property	1,392,525	-	1,392,525	-	487,384	35.00%
Claims secured by commercial property	726,170	45,483	726,170	19,006	445,110	59.73%
Past due loans	243,995	-	243,995	-	215,493	88.32%
Higher risk categories decided by the Board	10,148,244	-	9,970,650	-	19,257,783	193.14%
Secured by mortgages	-	-	-	-	-	-
Short-term claims and short-term corporate claims on banks and intermediary institutions	-	-	-	-	-	-
Undertakings for collective investments in mutual funds	-	-	-	-	-	-
Other receivables	5,430,204	24,678	5,430,204	4,936	3,705,179	68.17%
Equity securities	1,585,618	-	1,585,618	-	1,585,618	100.00%
Total	127,021,175	32,235,405	120,280,233	10,841,964	70,638,235	53.87%

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X. Explanations on unconsolidated risk management (continued)

d. Standardised approach - Exposures by asset classes and risk weights

Current period											Total credit exposures amount (post CCF and post-CRM)
Risk classes/Risk weights	0%	10%	20%	35%	50%	75%	100%	150%	250%	Others	
Claims on sovereigns and Central Banks	71,529,865	-	-	-	-	-	-	-	-	-	71,529,865
Claims on regional governments or local authorities	-	-	3,407,029	-	293,752	-	-	-	-	-	3,700,781
Claims on administrative bodies and other non-commercial undertakings	-	-	-	-	-	-	-	-	-	-	-
Claims on multilateral development banks	-	-	-	-	-	-	-	-	-	-	-
Claims on international organizations	-	-	-	-	-	-	-	-	-	-	-
Claims on banks and intermediary institutions	-	-	4,329,524	-	2,214,443	-	153,665	-	-	-	6,697,632
Claims on corporates	397,007	-	6,269,920	-	7,861,935	-	43,489,816	526,547	-	-	58,565,225
Claims on retails	-	-	-	-	55,174	17,624,941	54,450	510,243	-	-	18,244,808
Claims secured by residential property	-	-	-	3,041,706	-	-	-	-	-	-	3,041,706
Claims secured by commercial property	-	-	-	-	1,164,826	-	105,378	-	-	-	1,270,204
Past due loans	-	-	-	-	150,832	-	124,467	37,014	-	-	312,313
Higher risk categories decided by the Board	-	-	-	-	11,357	-	671,760	7,597,305	-	-	8,280,422
Secured by mortgages	-	-	-	-	-	-	-	-	-	-	-
Short-term claims and short-term corporate claims on banks and intermediary institutions	-	-	-	-	-	-	-	-	-	-	-
Undertakings for collective investments in mutual funds	-	-	-	-	-	-	-	-	-	-	-
Other receivables	2,234,688	-	6	-	-	-	6,549,024	-	-	-	8,783,718
Stock investments	-	-	-	-	-	-	2,501,428	-	-	-	2,501,428
Total	74,161,560	-	14,026,479	3,041,706	11,752,319	17,624,941	53,649,988	8,671,109	-	-	182,928,102

Prior period											Total credit exposures amount (post CCF and post-CRM)
Risk classes/Risk weights	0%	10%	20%	35%	50%	75%	100%	150%	250%	Others	
Claims on sovereigns and Central Banks	38,599,553	-	-	-	-	-	-	-	-	-	38,599,553
Claims on regional governments or local authorities	-	-	296,303	-	-	-	-	-	-	457,888	754,191
Claims on administrative bodies and other non-commercial undertakings	-	-	-	-	-	-	-	-	-	-	-
Claims on multilateral development banks	-	-	-	-	-	-	-	-	-	-	-
Claims on international organizations	-	-	-	-	-	-	-	-	-	-	-
Claims on banks and intermediary institutions	-	-	7,511,481	-	4,406,800	-	38,390	-	-	-	11,956,671
Claims on corporates	647,275	-	6,509,015	-	10,496,613	-	28,506,092	374,568	-	2,822,737	49,356,300
Claims on retails	-	-	-	-	-	10,962,758	7	119,613	-	-	11,082,378
Claims secured by residential property	-	-	-	1,392,525	-	-	-	-	-	-	1,392,525
Claims secured by commercial property	-	-	-	-	600,133	-	145,043	-	-	-	745,176
Past due loans	-	-	-	-	117,314	-	66,372	60,309	-	-	243,995
Higher risk categories decided by the Board	-	-	-	-	6,242	-	2,775,463	7,088,335	-	100,610	9,970,650
Secured by mortgages	-	-	-	-	-	-	-	-	-	-	-
Short-term claims and short-term corporate claims on banks and intermediary institutions	-	-	-	-	-	-	-	-	-	-	-
Undertakings for collective investments in mutual funds	-	-	-	-	-	-	-	-	-	-	-
Other receivables	1,729,957	-	-	-	-	-	3,705,183	-	-	-	5,435,140
Stock investments	-	-	-	-	-	-	1,585,618	-	-	-	1,585,618
Total	40,976,785	-	14,316,799	1,392,525	15,627,102	10,962,758	36,822,168	7,642,825	-	3,381,235	131,122,197

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X. Explanations on unconsolidated risk management (continued)

4. Evaluation of counterparty credit risk according to measurement methods

a. Qualitative disclosure on counterparty credit risk

According to Appendix 2 of the Regulation on Measurement and Assessment of Capital Adequacy of Banks, promulgated in the Official Gazette, no. 29511, dated 23 October 2015, the counterparty credit risk arising from the transactions that binding both parties such as derivatives and repo, is calculated. The sum of renewal cost for derivative transactions and potential credit risk amount is considered as the risk amount. Renewal cost is calculated with valuation of contracts at fair value and potential credit risk amount is calculated by multiplying the contract amounts with the credit conversion ratios stated in the appendix of the regulation.

For the forward, option and other derivative contracts, collateral management is conducted daily according to the International Swap and Derivative Association (ISDA) and Credit Support Annex (CSA) agreements concluded with international counterparties, and when needed, short term total credit risk is reduced by usage of rights and performance of duties.

For the forward, option and other derivative transactions which are done by local agreements and not according to ISDA agreement, the credit risk is controlled via "Pre-Settlement" limit monitoring. Pre-settlement limit is allocated for the firms and organizations according to analysis and allocation processes. The basic rule for the Bank is that client risks do not exceed such limits. Risks are monitored simultaneously with the market and developed models are used in calculation.

The maximum risk that the counterparty may incur due to futures, options and other derivative transactions are limited, monitored with daily and instant reports. Possible limit breaches are reported to the high level committees and senior management of the bank and related actions taken to mitigate the risk.

b. Counterparty credit risk (CCR) approach analysis

Current period	Replacement cost	Potential future exposure	EEPE (*)	Alpha used for computing regulatory EAD	EAD post-CRM	RWA
Standardised Approach - CCR (for derivatives)	2,241,534	2,487,786	-	1.40	4,729,320	2,612,552
Internal Model Method (for derivative financial instruments, repo transactions, securities or commodity lending or borrowing transactions, long settlement transactions and securities financing transactions)	-	-	-	-	-	-
Simple Approach for credit risk mitigation (for repo transactions, securities or commodity lending or borrowing transactions, long settlement transactions and securities financing transactions)	-	-	-	-	-	-
Comprehensive Approach for credit risk mitigation (for repo transactions, securities or commodity lending or borrowing transactions, long settlement transactions and securities financing transactions)	-	-	-	-	13,258	6,587
Value-at-Risk (VaR) for repo transactions, securities or commodity lending or borrowing transactions, long settlement transactions and securities financing transactions	-	-	-	-	-	-
Total						2,619,139

(*) Effective expected positive exposure

Prior period	Replacement cost	Potential future exposure	EEPE (*)	Alpha used for computing regulatory EAD	EAD post-CRM	RWA
Standardised Approach - CCR (for derivatives)	6,675,424	1,619,184	-	1.40	8,294,608	3,731,601
Internal Model Method (for derivative financial instruments, repo transactions, securities or commodity lending or borrowing transactions, long settlement transactions and securities financing transactions)	-	-	-	-	-	-
Simple Approach for credit risk mitigation (for repo transactions, securities or commodity lending or borrowing transactions, long settlement transactions and securities financing transactions)	-	-	-	-	-	-
Comprehensive Approach for credit risk mitigation (for repo transactions, securities or commodity lending or borrowing transactions, long settlement transactions and securities financing transactions)	-	-	-	-	326,984	65,402
Value-at-Risk (VaR) for repo transactions, securities or commodity lending or borrowing transactions, long settlement transactions and securities financing transactions	-	-	-	-	-	-
Total						3,797,004

(*) Effective expected positive exposure

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X. Explanations on unconsolidated risk management (continued)

c. Credit valuation adjustment (CVA) for capital charge

	Current period		Prior period	
	Exposure at default post-CRM	RWA	Exposure at default post-CRM	RWA
Total portfolios subject to the advanced CVA capital charge	-	-	-	-
(i) VaR component (including the 3*multiplier)	-	-	-	-
(ii) Stressed VaR component (including the 3*multiplier)	-	-	-	-
All portfolios subject to the standardised CVA capital charge	4,729,320	723,527	8,294,608	2,414,686
Total subject to the CVA capital charge	4,729,320	723,527	8,294,608	2,414,686

ç. Standardised approach: CCR exposures by risk class and risk weights

Current period										Total credit exposure (*)
Asset classes/Risk weight	0%	10%	20%	50%	75%	100%	150%	Others		
Claims on sovereigns and Central Banks	94,556	-	-	-	-	-	-	-	-	94,556
Claims on regional governments or local authorities	-	-	-	-	-	-	-	-	-	-
Claims on administrative bodies and other non-commercial undertakings	-	-	-	-	-	-	-	-	-	-
Claims on multilateral development banks	-	-	-	-	-	-	-	-	-	-
Claims on international organizations	-	-	-	-	-	-	-	-	-	-
Claims on banks and intermediary institutions	-	-	1,756,246	1,216,917	-	3,829	-	-	-	2,976,992
Claims on corporates	-	-	-	-	-	1,609,319	-	-	-	1,609,319
Claims included in the regulatory retail portfolios	-	-	-	-	61,711	-	-	-	-	61,711
Other receivables (**)	-	-	-	-	-	-	-	-	-	-
Total	94,556	-	1,756,246	1,216,917	61,711	1,613,148	-	-	-	4,742,578

(*) Total credit exposure: After applying counterparty credit risk measurement techniques that are related to the amount of capital adequacy calculation.

(**) Other receivables: Includes counterparty credit risk that does not reported in "central counterparty" table.

Prior period										Total credit exposure (*)
Asset classes/Risk weight	0%	10%	20%	50%	75%	100%	150%	Others		
Claims on sovereigns and Central Banks	390,927	-	-	-	-	-	-	-	-	390,927
Claims on regional governments or local authorities	-	-	-	-	-	-	-	-	-	-
Claims on administrative bodies and other non-commercial undertakings	-	-	-	-	-	-	-	-	-	-
Claims on multilateral development banks	-	-	-	-	-	-	-	-	-	-
Claims on international organizations	-	-	-	-	-	-	-	-	-	-
Claims on banks and intermediary institutions	-	-	3,064,325	3,954,633	-	-	-	-	-	7,018,958
Claims on corporates	-	-	-	-	-	1,192,168	-	-	-	1,192,168
Claims included in the regulatory retail portfolios	-	-	-	-	19,539	-	-	-	-	19,539
Other receivables (**)	-	-	-	-	-	-	-	-	-	-
Total	390,927	-	3,064,325	3,954,633	19,539	1,192,168	-	-	-	8,621,592

(*) Total credit exposure: After applying counterparty credit risk measurement techniques that are related to the amount of capital adequacy calculation.

(**) Other receivables: Includes counterparty credit risk that does not reported in "central counterparty" table.

d. Collaterals for counterparty credit risk (CCR)

Related table is not presented due to not having derivative collaterals which is considered in the calculation of capital adequacy ratio.

e. Credit derivatives

There is no credit derivative transaction.

5. Explanations on securitisation

There is no securitisation transaction.

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X. Explanations on unconsolidated risk management (continued)

6. Explanations on market risk

The Bank has reviewed activities of market risk management and has taken necessary precautions in order to mitigate the market risk within the framework of financial risk management, according to the "Regulation on the Internal Systems of Banks and Internal Capital Adequacy Valuation Process" and the "Regulation on Measurement and Assessment of Capital Adequacy of Banks", which was published in the Official Gazette No. 29057 and dated 11 July 2014.

Market risk is managed based on different product mandates based on banking books and trading books and within the risk limits including sensitivity that is approved by Board of Directions in where related limits are monitored on a regular basis and the results are shared with senior management and the Board of Directors. In addition, the impacts of change in balance sheet due to banking activities on risk appetite are simulated.

Risk Committee monitors and evaluates market risk closely. Recommendations are presented to the Asset Liability Committee, Risk Committee and Board of Directors in terms of the risk management.

Risk management strategies and policies are updated regarding to regulations stated above and is approved by Board of Director's. In relation to the regulatory capital requirements, on a consolidated and the bank only basis, standard method is used in measuring the market risk. In addition to the standard method, for internal reporting purposes, value-at-risk ("VaR") is used in daily calculation of amount subject to market risk and are reported to the senior management. Stress tests and scenario analyses are also applied monthly besides within the scope of ICAAP to complement the risk analysis.

In addition, compliance on ING Bank's policies related to market risk, especially for the international regulations, is reviewed regularly. All these analysis are reflected in the relevant written procedures and policies.

	Current period	Prior period
	RWA	RWA
Outright products	3,699,988	2,219,863
Interest rate risk (general and specific)	1,599,863	1,884,850
Equity risk (general and specific)	-	-
Foreign exchange risk	2,100,125	335,013
Commodity risk	-	-
Options	-	-
Simplified approach	-	-
Delta-plus method	-	-
Scenario approach	-	-
Securitisation	-	-
Total	3,699,988	2,219,863

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X. Explanations on unconsolidated risk management (continued)

7. Explanations on operational risk

The "Basic Indicator Method" that is stated in "Regulation on Measurement and Assessment of Capital Adequacy of Banks" Communiqué published in the Official Gazette no. 28337 on 28 June 2012, is used in the annual operational risk calculation of the Bank. The amount subject to the operational risk as of 31 December 2024 is calculated by using the gross income of the Bank in 2021, 2022 and 2023.

Annual gross revenue is calculated by deduction of profit/loss derived from the sale of available-for-sale assets and held-to-maturity securities, extraordinary income and indemnity insurance gains from the total of net interest income and non-interest income.

Current period	2021 amount	2022 amount	2023 amount	Total / Number of years of positive gross income	Ratio (%)	Total
Gross income	3,637,314	6,780,673	5,997,005	5,471,664	15	820,750
Amount subject to operational risk (Total*12.5)						10,259,371

Prior period	2020 amount	2021 amount	2022 amount	Total / Number of years of positive gross income	Ratio (%)	Total
Gross income	3,404,666	3,637,314	6,780,673	4,607,551	15	691,133
Amount subject to operational risk (Total*12.5)						8,639,158

8. Interest rate risk arising from banking book

Interest rate risk in the banking book is managed within the framework of sensitivity based risk limits which is internally determined by the Board of Directors, and results are shared periodically with senior management, Asset Liability Committee, Risk Committee and Board of Directors. In addition, interest rate risk in the banking book is calculated according to the interest structure profile of all interest sensitive assets and liabilities and the period remaining for their maturity or re-pricing dates under the "Regulation on Measurement and Evaluation of the Interest Rate Risk in the Banking Book through Standard Shock Method" published by the BRSA in the Official Gazette no: 28034 and dated 23 August 2011.

Under the regulation, core deposit is calculated only for demand deposits and also separately for each currency. Maturity profile of demand deposit assumptions have been determined by taking into account the analyses conducted by the Bank through using historical data for demand deposit portfolio and the maximum hypothetical maturity limit stated in the Regulation.

In addition, analysis being performed about asset and liability accounts comprising different customer behavior characteristics such as internal interest sensitivity and optionality, and effects on balance sheet risk are evaluated within the framework of analysis results and business lines' expectations.

Interest rate risk in the banking book standard ratio is calculated at the end of months by measuring and evaluating the interest rate risk resulting from balance sheet and off-balance sheet positions in the banking books through standard shock method. Profits/losses refer to the profit/loss risk that might occur in the market value of financial assets and liabilities in the balance sheet as a result of applying upward/downward scenarios to the market interest rate.

Currency	Applied shock (+ / -x basis points)	Gains / (Losses)	Gains / Equity (Losses) / Equity
TL	(-) 400	958,909	4.09%
TL	(+) 500	(1,069,368)	(4.56)%
EUR	(-) 200	113,399	0.48%
EUR	(+) 200	(107,007)	(0.46)%
USD	(-) 200	(634,230)	(2.70)%
USD	(+) 200	503,375	2.15%
Total (for negative shocks)		438,078	1.87%
Total (for positive shocks)		(673,000)	(2.87)%

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XI. Explanations on hedge transactions

Breakdown of the derivative transactions used in cash flow hedges

	Current period			Prior period		
	Notional	Assets	Liabilities	Notional	Assets	Liabilities
Interest rate swaps	5,350,000	189,924	9,245	300,000	40,967	-
Cross currency swaps	-	-	-	-	-	-
Total	5,350,000	189,924	9,245	300,000	40,967	-

Explanations on derivative transactions used in cash flow hedges

Current period							
Hedging instrument	Hedged item	Nature of risk hedged	Hedging instrument FV		Net gain / (loss) recognized in OCI during the period	Net gain / (loss) reclassified to income statement during the year	Ineffective portion recognized in income statement (Net)
			Assets	Liabilities			
Interest rate swaps	TL/FC customer deposits	Cash flow risk due to the changes in the interest rates of TL and FC customer deposits	189,924	9,245	148,599	(85,086)	(13,294)
Cross currency swaps	TL customer deposits and FC borrowings	Cash flow risk due to the changes in the interest rates of deposits and currency risk of FC borrowings	-	-	-	-	-
Total			189,924	9,245	148,599	(85,086)	(13,294)

Prior period							
Hedging instrument	Hedged item	Nature of risk hedged	Hedging instrument FV		Net gain / (loss) recognized in OCI during the period	Net gain / (loss) reclassified to income statement during the year	Ineffective portion recognized in income statement (Net)
			Assets	Liabilities			
Interest rate swaps	TL/FC customer deposits	Cash flow risk due to the changes in the interest rates of TL and FC customer deposits	40,967	-	(58,010)	34,573	802
Cross currency swaps	TL customer deposits and FC borrowings	Cash flow risk due to the changes in the interest rates of deposits and currency risk of FC borrowings	-	-	(1,609)	-	-
Total			40,967	-	(59,619)	34,573	802

Explanations on fair value hedges

Current period				
Hedging instrument	Hedged item	Nature of risk hedged	Fair Value Difference of Hedging Instrument	Fair Value Difference of Hedged Items
Interest rate swap	Fixed interest rate FC securities issued	Interest rate risk	(186,293)	185,881

Contractual maturity analysis of the derivative transactions subject to cash flow hedges:

Maturity analysis of the derivative transactions subject to cash flow hedges is provided in the Section Four - Note VI.

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XII. Explanations on segment reporting

The Bank operates mainly in corporate, business and retail banking services. In scope of corporate, business banking operations, customers are provided with special banking services including cash management service. In retail banking operations, customers are provided with debit and credit card, retail loan, online banking and private banking services. Spot TL, foreign exchange buy/sell transactions, derivative transactions, and treasury bill/government bond buy/sell transactions are performed at treasury operations.

Information on operating segments is prepared in accordance with the data provided by the Bank's Management Reporting System.

	Corporate, Business Banking	Retail Banking	Other	Total
Current period – 31 December 2024				
Net interest income	3,124,271	2,784,775	1,819,395	7,728,441
Net fees and commissions income and other operating income	815,568	1,577,416	511,686	2,904,670
Trading gain/loss	831,182	369,577	(8,036)	1,192,723
Dividend income	-	-	71,562	71,562
Expected credit loss	(520,117)	(121,053)	(11,611)	(652,781)
Segment results	4,250,904	4,610,715	2,382,996	11,244,615
Other operating expenses (*) (**)	-	-	-	(9,391,262)
Income/loss from investments under equity accounting	-	-	-	624,544
Income from continuing operations before tax	-	-	-	2,477,897
Tax provision (*)	-	-	-	(242,762)
Net profit				2,235,135

	Corporate, Business Banking	Retail Banking	Other	Total
Prior period – 31 December 2023				
Net interest income	5,176,644	1,712,705	(4,396,546)	2,492,803
Net fees and commissions income and other operating income	990,194	908,966	314,128	2,213,288
Trading gain/loss	1,085,662	406,437	910,050	2,402,149
Dividend income	-	-	661	661
Expected credit loss	(505,310)	(113,718)	(2,174)	(621,202)
Segment results	6,747,190	2,914,390	(3,173,881)	6,487,699
Other operating expenses (*) (**)	-	-	-	(6,357,408)
Income/loss from investments under equity accounting	-	-	-	362,070
Income from continuing operations before tax	-	-	-	492,361
Tax provision (*)	-	-	-	1,205,677
Net profit				1,698,038

(*) Other operational expenses and tax provision are presented at total column due to inability to allocate among the sections.

(**) Includes "Personnel Expenses" and "Other Provision Expenses" that presented in the statement of profit or loss as a different items.

	Corporate, Business Banking	Retail Banking	Other	Total
Current period – 31 December 2024				
Asset	57,016,042	24,189,856	98,380,903	179,586,801
Liability	47,220,280	82,045,001	30,290,312	159,555,593
Equity	-	-	20,031,208	20,031,208
Prior period – 31 December 2023				
Asset	57,491,183	17,888,248	65,140,814	140,520,245
Liability	34,456,037	65,234,561	25,961,589	125,652,187
Equity	-	-	14,868,058	14,868,058

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Section five

Information and disclosures related to unconsolidated financial statements

I. Explanations and notes related to assets of the unconsolidated balance sheet

1. Information related to cash equivalents and the account of the Central Bank of the Republic of Turkey

1.1. Information on cash equivalents

	Current period		Prior period	
	TL	FC	TL	FC
Cash in TL/foreign currency	318,868	2,471,697	180,874	2,363,704
Central Bank of Turkey	19,920,074	16,521,062	7,428,641	16,812,217
Other	-	112,424	-	171,942
Total	20,238,942	19,105,183	7,609,515	19,347,863

1.2. Information related to the account of the Central Bank of Turkey

	Current period		Prior period	
	TL	FC	TL	FC
Unrestricted demand deposit	16,369,885	8,398,502	6,377,113	8,625,039
Restricted time deposit	-	-	-	-
Reserve requirement	3,550,189	8,122,560	1,051,528	8,187,178
Total	19,920,074	16,521,062	7,428,641	16,812,217

As per the "Communiqué on Reserve Requirements" promulgated by the Central Bank, Banks must keep required reserves as of the balance sheet date at a rate ranging between 3% and 33% for Turkish lira deposits and liabilities depending on their maturity. The reserve rates vary between 5% and 30% for foreign currency deposits and other foreign currency liabilities and vary between 22% and 26% for gold liabilities depending on their maturity. The additional reserve requirement ratio of 4 percent to be maintained in Turkish lira deposits denominated in foreign currency (except foreign bank deposits and precious metal accounts).

TL 16,367,854 (31 December 2023: TL 6,376,736) of the TL reserve deposits provided over the average balance and TL 8,398,502 (31 December 2023: TL 8,625,039) of the FC reserve deposits provided over the average balance are presented under unrestricted demand deposit account.

2. Information on financial assets at fair value through profit/loss

2.1. Information on financial assets at fair value through profit/loss subject to repo transactions and those given as collateral/blocked

Financial assets at fair value through profit/loss subject to repo transactions and those given as collateral/blocked are stated below in net amount.

	Current period	Prior period
Unrestricted portfolio	1,422,928	372,290
Collateral / blocked	364,743	69,813
Total	1,787,671	442,103

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I. Explanations and notes related to assets of the unconsolidated balance sheet (continued)

2.2. Positive differences related to derivative financial assets held for trading

	Current period		Prior period	
	TL	FC	TL	FC
Forward transactions	-	590,823	-	257,347
Swap transactions	1,098,008	431,284	827,566	458,588
Futures transactions	-	-	-	-
Options	-	275,399	-	264,738
Other	-	-	-	-
Total	1,098,008	1,297,506	827,566	980,673

3. Information on banks and foreign banks accounts

3.1. Information on banks

	Current period		Prior period	
	TL	FC	TL	FC
Banks	7,692	1,738,729	982	1,404,392
Domestic	7,692	1,709	982	9,465
Foreign	-	1,737,020	-	1,394,927
Headquarters and branches abroad	-	-	-	-
Total	7,692	1,738,729	982	1,404,392

3.2. Information on foreign banks

	Unrestricted amount		Restricted amount	
	Current period	Prior period	Current period	Prior period
EU countries	131,829	100,848	1,498,655	584,623
USA, Canada	91,470	127,897	47	501,277
OECD Countries (*)	10,601	77,163	-	-
Off-shore banking regions	-	-	-	-
Other	4,418	3,119	-	-
Total	238,318	309,027	1,498,702	1,085,900

(*) OECD countries except EU countries, USA and Canada

As of 31 December 2024, restricted bank balance amounting to TL 1,498,701 (31 December 2023: TL 1,085,900) all of which is comprised of (31 December 2023: all amount) collaterals that is held by counter banks under CSA (credit support annex) contracts and is calculated based on related derivatives market price.

4. Information on financial assets at fair value through other comprehensive income

4.1. Financial assets at fair value through other comprehensive income subject to repo transactions and those given as collateral / blocked

Financial assets at fair value through other comprehensive income subject to repo transactions and those given as collateral / blocked with net amounts are shown in below table.

Financial assets measured at fair value through other comprehensive income:

	Current period	Prior period
Unrestricted portfolio	4,665,280	1,604,567
Repo transactions	-	16,185
Collateral / blocked	675,340	2,193,311
Total	5,340,620	3,814,063

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I. Explanations and notes related to assets of the unconsolidated balance sheet (continued)

4.2. Information on financial assets at fair value through other comprehensive income

Financial assets measured at fair value through other comprehensive income:

	Current period	Prior period
Debt securities	5,474,689	4,496,019
Quoted to stock exchange	5,474,689	4,496,019
Not quoted	-	-
Equity certificates	114,514	66,629
Quoted to stock exchange	-	-
Not quoted	114,514	66,629
Provision for impairment (-)	(248,583)	(748,585)
Total	5,340,620	3,814,063

5. Information on loans

5.1. Information on the balance of all types of loans and advances given to shareholders and employees of the Bank

	Current period		Prior period	
	Cash	Non-cash	Cash	Non-cash
Direct loans granted to shareholders of the Bank	78	717,961	65	1,956,949
Corporate shareholders	-	717,961	-	1,956,949
Real person shareholders	78	-	65	-
Indirect loans granted to shareholders of the Bank	34,996	772,127	1,477	1,255,729
Loans granted to employees of the Bank	163,712	-	110,940	-
Total	198,786	1,490,088	112,482	3,212,678

5.2. Information on the first and second group loans and other receivables including restructured or rescheduled loans

Current period				
Cash loans	Standard loans	Loans and other receivables under close monitoring		
		Loans and receivables not subject to restructuring	Restructured loans and receivables	
			Revised contract terms	Refinance
Non-specialized loans	75,611,094	6,863,983	90,665	90,396
Business loans	20,583,467	3,067,595	300	90,396
Export loans	22,410,719	2,890,091	-	-
Import loans	-	-	-	-
Loans given to financial sector	4,050,906	-	-	-
Consumer loans	22,278,291	773,404	77,889	-
Credit cards	944,787	102,375	12,476	-
Other	5,342,924	30,518	-	-
Specialized loans	-	-	-	-
Other receivables	-	-	-	-
Total	75,611,094	6,863,983	90,665	90,396

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I. Explanations and notes related to assets of the unconsolidated balance sheet (continued)

Prior period				
Cash loans	Standard loans	Loans and other receivables under close monitoring		
		Loans and receivables not subject to restructuring	Restructured loans and receivables	
			Revised contract terms	Refinance
Non-specialized loans	64,530,219	10,187,599	55,060	100,628
Business loans	18,080,197	3,968,748	1,411	100,628
Export loans	22,670,345	3,456,029	-	-
Import loans	-	-	-	-
Loans given to financial sector	5,428,565	1,775,402	-	-
Consumer loans	16,243,517	773,038	51,139	-
Credit cards	690,656	58,621	2,510	-
Other	1,416,939	155,761	-	-
Specialized loans	-	-	-	-
Other receivables	-	-	-	-
Total	64,530,219	10,187,599	55,060	100,628
Current period				
		Loans under close monitoring	Prior period	
	Standard loans		Standard loans	Loans close monitoring
12 months expected credit losses	308,581	-	374,442	-
Lifetime expected credit losses				
significant increase in credit risk	-	271,395	-	323,330

5.3. Loans according to their maturity structure

Cash loans	Standard loans	Loans and other receivables under close monitoring	
		Loans and receivables not subject to restructuring	Restructured loans and receivables
Short-term loans and other receivables	32,132,993	4,409,044	99,531
Medium and long-term loans and other receivables	43,478,101	2,454,939	81,530
Total	75,611,094	6,863,983	181,061

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I. Explanations and notes related to assets of the unconsolidated balance sheet (continued)

5.4. Information on consumer loans, individual credit cards, personnel loans and credit cards given to personnel

	Short term	Medium and long term	Total
Consumer loans – TL	5,082,302	16,563,191	21,645,493
Mortgage loans	565	6,609,597	6,610,162
Automotive loans	139,698	736,786	876,484
General purpose loans	4,942,039	9,216,808	14,158,847
Other	-	-	-
Consumer loans – Indexed to FC	-	-	-
Mortgage loans	-	-	-
Automotive loans	-	-	-
General purpose loans	-	-	-
Other	-	-	-
Consumer loans – FC	-	-	-
Mortgage loans	-	-	-
Automotive loans	-	-	-
General purpose loans	-	-	-
Other	-	-	-
Consumer credit cards – TL	865,000	7,040	872,040
With installments	185,522	7,040	192,562
Without installments	679,478	-	679,478
Consumer credit cards – FC	-	-	-
With installments	-	-	-
Without installments	-	-	-
Personnel loans – TL	75,789	29,069	104,858
Mortgage loans	-	-	-
Automotive loans	-	-	-
General purpose loans	75,789	29,069	104,858
Other	-	-	-
Personnel loans – Indexed to FC	-	-	-
Mortgage loans	-	-	-
Automotive loans	-	-	-
General purpose loans	-	-	-
Other	-	-	-
Personnel loans – FC	-	-	-
Mortgage loans	-	-	-
Automotive loans	-	-	-
General purpose loans	-	-	-
Other	-	-	-
Personnel credit cards – TL	58,932	-	58,932
With installments	15,375	-	15,375
Without installments	43,557	-	43,557
Personnel credit cards – FC	-	-	-
With installments	-	-	-
Without installments	-	-	-
Overdraft accounts – TL (real person)	1,379,233	-	1,379,233
Overdraft accounts – FC (real person)	-	-	-
Total	7,461,256	16,599,300	24,060,556

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I. Explanations and notes related to assets of the unconsolidated balance sheet (continued)

5.5. Information on commercial loans with installments and corporate credit cards

	Short term	Medium and long term	Total
Commercial installment loans - TL	3,428,665	7,907,713	11,336,378
Real estate loans	-	1,315	1,315
Automotive loans	7,662	844,243	851,905
General purpose loans	-	-	-
Other	3,421,003	7,062,155	10,483,158
Commercial installment loans – Indexed to FC	-	-	-
Real estate loans	-	-	-
Automotive loans	-	-	-
General purpose loans	-	-	-
Other	-	-	-
Commercial installment loans - FC	-	-	-
Real estate residential loans	-	-	-
Automotive loans	-	-	-
General purpose loans	-	-	-
Other	-	-	-
Corporate credit cards – TL	128,666	-	128,666
With installments	28,249	-	28,249
Without installments	100,417	-	100,417
Corporate credit cards – FC	-	-	-
With installments	-	-	-
Without installments	-	-	-
Overdraft loans – TL (legal entity)	92,378	-	92,378
Overdraft loans – FC (legal entity)	-	-	-
Total	3,649,709	7,907,713	11,557,422

5.6. Loans according to borrowers

	Current period	Prior period
Public	3,700,781	754,191
Private	78,955,357	74,119,315
Total	82,656,138	74,873,506

5.7. Domestic and foreign loans

	Current period	Prior period
Domestic loans	82,635,749	74,860,868
Foreign loans	20,389	12,638
Total	82,656,138	74,873,506

5.8. Loans granted to subsidiaries and associates

	Current period	Prior period
Direct loans granted to subsidiaries and associates	450,826	787,618
Indirect loans granted to subsidiaries and associates	-	-
Total	450,826	787,618

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I. Explanations and notes related to assets of the unconsolidated balance sheet (continued)

5.9. Specific provisions set aside against loans

	Current period	Prior period
Loans and receivables with limited collectability	53,789	24,348
Loans and receivables with doubtful collectability	74,233	13,610
Uncollectible loans and receivables	547,187	679,005
Total	675,209	716,963

5.10. Information on non-performing loans (net)

5.10.1 Information on non-performing loans and other receivables restructured or rescheduled

	Group III Loans and receivables with limited collectability	Group IV Loans and receivables with doubtful collectability	Group V Uncollectible loans and receivables
Current period			
Gross amounts before specific provision	-	-	10,644
Restructured loans	-	-	10,644
Prior period			
Gross amounts before specific provision	-	-	41,980
Restructured loans	-	-	41,980

5.10.2. Information on total non-performing loans

	Group III Loans and receivables with limited collectability	Group IV Loans and receivables with doubtful collectability	Group V Uncollectible loans and receivables
Prior period end balance	44,528	38,182	890,861
Additions (+)	330,806	63,804	30,432
Transfers to other categories of non-performing loans (+)	-	216,595	173,563
Transfers from other categories of non-performing loans (-)	(216,595)	(173,563)	-
Collections (-)	(61,208)	(21,025)	(255,612)
Write-offs (-) (*)	(28)	(75)	(1,931)
Sold Portfolio (-) (**)	-	-	(52,315)
Corporate and commercial loans	-	-	(9,403)
Retail loans	-	-	(38,627)
Credit cards	-	-	(4,285)
Other	-	-	-
Current period end balance	97,503	123,918	784,998
Provisions (-)	(53,789)	(74,233)	(547,187)
Net balance on balance sheet	43,714	49,685	237,811

(*) In current period, the amount of write-off made according to the "Regulation on the Procedures and Principles for Classification of Loans by Banks and Provisions to be set aside" published in the Official Gazette dated 6 July 2021 and numbered 31533, there is no write-off process and the values in the table are the amounts written off from the assets (31 December 2023: None).

(**) The Bank sold non-performing loan portfolio amounting to TL 52,315 (31 December 2023: TL 204,403) and followed in off-balance sheet accounts amounting to TL 56,059 for an amount of TL 26,850 to asset management companies as of 25 November 2024.

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I. Explanations and notes related to assets of the unconsolidated balance sheet (continued)

5.10.3. Information on foreign currency non-performing loans and other receivables

	Group III	Group IV	Group V
	Loans and receivables with limited collectability	Loans and receivables with doubtful collectability	Uncollectible loans and receivables
Current period			
Balance at the end of the period	1,220	6,978	114,611
Provision (-)	(619)	(2,873)	(42,850)
Net balance on balance sheet	601	4,105	71,761
Prior period			
Balance at the end of the period	14,210	18,291	122,033
Provision (-)	(6,162)	(918)	(98,494)
Net balance on balance sheet	8,048	17,373	23,539

Non-performing loans granted as foreign currency are followed under TL accounts at the balance sheet.

5.10.4. Gross and net amounts of non-performing loans per customer categories

	Group III	Group IV	Group V
	Loans and receivables with limited collectability	Loans and receivables with doubtful collectability	Uncollectible loans and receivables
Current period (net)	43,714	49,685	237,811
Loans granted to corporate entities and real person (gross)	97,503	123,918	784,998
Provision amount (-)	(53,789)	(74,233)	(547,187)
Loans granted to corporate entities and real person (net)	43,714	49,685	237,811
Banks (gross)	-	-	-
Provision amount (-)	-	-	-
Banks (net)	-	-	-
Other loans (gross)	-	-	-
Provision amount (-)	-	-	-
Other loans (net)	-	-	-
Prior period (net)	20,180	24,572	211,856
Loans granted to corporate entities and real person (gross)	44,528	38,182	890,861
Provision amount (-)	(24,348)	(13,610)	(679,005)
Loans granted to corporate entities and real person (net)	20,180	24,572	211,856
Banks (gross)	-	-	-
Provision amount (-)	-	-	-
Banks (net)	-	-	-
Other loans (gross)	-	-	-
Provision amount (-)	-	-	-
Other loans (net)	-	-	-

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I. Explanations and notes related to assets of the unconsolidated balance sheet (continued)

5.10.5. According to TFRS 9, accruals, valuation differences and related provisions calculated for non-performing loans

	Group III	Group IV	Group V
	Loans and receivables with limited collectability	Loans and receivables with doubtful collectability	Uncollectable loans and receivables
Current period (Net)	4,776	3,752	14,920
Interest accruals and valuation differences	10,904	9,857	41,890
Provision (-)	(6,128)	(6,105)	(26,970)
Prior period (Net)	675	649	13,243
Interest accruals and valuation differences	1,560	1,792	46,755
Provision (-)	(885)	(1,143)	(33,512)

5.11. Liquidation policy for uncollectible loans and receivables

As with the loans classified in the other liquidation accounts, "Loans and receivables with limited collectability" and "Loans and receivables with doubtful collectability" accounts, according to the Provisions Regulation, the most appropriate action is determined by evaluating the quality of the loan, the collateral status, bona fide of the debtor and assessment of the emergency, in order to ensure the collection and liquidation of the loans classified in the accounts of "Uncollectable loans and receivables".

5.12. Information on the write-off policy

Accounting policies regarding the write-off policy are explained in the section three, footnote VIII.

In current period, the amount of write-off made according to the "Regulation on the Procedures and Principles for Classification of Loans by Banks and Provisions to be set aside" published in the Official Gazette dated 6 July 2021 and numbered 31533 is none (31 December 2023: None).

6. Financial assets measured at amortised cost

6.1. Financial assets subject to repurchase agreements and provided as collateral/blocked:

	Current period	Prior period
Investments subject to repurchase agreements	109,386	-
Collateralised / blocked investments (*)	3,759,553	7,780,674
Total	3,868,939	7,780,674

(*) Consists of bonds given as collaterals by the Bank to be a member of Interbank, BIST, Derivatives Exchange, Takasbank, Money Markets and to operate in those markets.

6.2. Government securities measured at amortised cost:

	Current period	Prior period
Government bonds	12,681,010	9,970,600
Treasury bills	-	-
Other government securities	-	-
Total	12,681,010	9,970,600

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I. Explanations and notes related to assets of the unconsolidated balance sheet (continued)

6.3. Financial assets measured at amortised cost:

	Current period	Prior period
Debt securities	12,681,010	9,970,600
Quoted to stock exchange	12,681,010	9,970,600
Not quoted	-	-
Impairment provision (-)	-	-
Total	12,681,010	9,970,600

6.4. Movement of financial assets measured at amortised cost:

	Current period	Prior period
Balances at the beginning of the period	9,970,600	7,178,958
Foreign currency differences on monetary assets	-	-
Purchases during the period	2,521,541	4,174,960
Disposals through sales and redemptions	(568,261)	(2,012,522)
Provision for impairment (-)	-	-
Valuation effect	757,130	629,204
Period end balance	12,681,010	9,970,600

7. Information on associates (net)

7.1. Explanations related to the associates

The Bank does not have any associates.

8. Information on subsidiaries (net)

8.1. Information on equity of subsidiaries (*)

8.1.1. Information on the consolidated subsidiaries

As of 31 December 2024, information on the equities of subsidiaries is as follows:

	ING European Financial Services Plc.	ING Leasing	ING Securities
Paid in capital and adjustment to paid-in capital	7,072	250,000	100,000
Profit reserves, capital reserves and prior year profit/loss	478,365	341,853	100,860
Profit	314,320	216,470	95,149
Development cost of operating lease (-)	-	-	-
Intangible assets (-)	-	(4,727)	-
Total core capital	799,757	803,596	296,009
Supplementary capital	-	-	-
Capital	799,757	803,596	296,009
Net usable shareholder's equity	799,757	803,596	296,009

The Bank does not have any additional capital requirements due to the subsidiaries included in the calculation of capital requirement.

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I. Explanations and notes related to assets of the unconsolidated balance sheet (continued)

8.2. Information on subsidiaries

8.2.1. Information on the consolidated subsidiaries

Title	Address (city / country)	The Bank's share percentage-If different voting (%)	The Bank's risk group share (%)
(1) ING European Financial Services Plc.	Dublin/Ireland	100%	100%
(2) ING Leasing	Istanbul/Turkey	100%	100%
(3) ING Securities	Istanbul/Turkey	100%	100%

As of 31 December 2024, financial information on consolidated subsidiaries as follows (*):

	Total assets	Shareholders' equity	Total fixed assets	Interest income	Income from marketable securities portfolio	Current period profit/ loss	Prior period profit/loss	Fair value
(1)	21,016,815	799,757	97	1,307,106	-	314,320	185,972	-
(2)	2,720,875	808,323	1,557	592,273	-	216,470	105,335	-
(3)	576,909	296,009	771	157,078	-	95,149	67,467	-

(*) Consolidated subsidiaries regarding financial datas are prepared in accordance with BRSA regulations. The Bank makes regulations regarding consolidation principles.

8.3. Information on subsidiaries

8.3.1. Information on consolidated subsidiaries

	Current period	Prior period
Balance at the beginning of the period	2,182,061	1,171,862
Movements during the period	609,450	1,010,199
Purchases	-	-
Bonus shares obtained	-	-
Dividends from current year income	624,544	362,070
Sales	-	-
Revaluation increase	(15,094)	648,129
Provisions for impairment	-	-
Balance at the end of the period	2,791,511	2,182,061
Capital commitments	-	-
Share percentage at the end of the period (%)	100	100

8.4. Sectoral information on consolidated financial subsidiaries and the related carrying amounts

8.4.1. Information on consolidated subsidiaries

	Current period	Prior period
Banks	-	-
Insurance companies	-	-
Factoring companies (*)	-	171,382
Leasing companies	742,049	575,708
Finance companies	-	-
Other financial subsidiaries	2,039,462	1,424,971

(*) The Ordinary General Assembly Meeting of ING Faktoring A.Ş. in Liquidation was held on 30 January 2024, and as of 1 February 2024, the company was removed from the trade registry, its legal entity ended and the liquidation process was completed. With the completion of the liquidation process, the remaining TL 70,189 after deducting the share of the company owned by the Bank was recorded as income in the Bank's accounts.

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I. Explanations and notes related to assets of the unconsolidated balance sheet (continued)

8.5. Subsidiaries quoted in a stock exchange

There are no subsidiaries quoted on a stock exchange.

8.6. Information on non-financial subsidiaries that are not consolidated

ING Teknoloji A.Ş. was established by the Bank with TL 10,000 paid in capital and 100% ownership; it was registered in the Trade Registry Gazette on 7 March 2023.

9. Information on entities under common control (net)

9.1. Information on entities under common control (net)

There are no entities under common control.

10. Information on finance lease receivables (net)

The Bank does not have receivables from finance lease.

11. Information on derivative financial assets held for hedging

11.1 Information on positive differences of derivative financial assets held for hedging

	Current period		Prior period	
	TL	FC	TL	FC
Fair value hedge	-	-	-	-
Cash flow hedge	189,924	-	40,967	-
Net investment hedge	-	-	-	-
Total	189,924	-	40,967	-

12. Information on tangible assets (net)

Current period	Real estates	Right-of-use assets	Other fixed assets	Total
Cost				
Opening balance	292,751	302,157	949,522	1,544,430
Additions (*)	2,925,585	157,213	480,857	3,563,655
Disposals	(264,954)	(260,710)	(458,529)	(984,193)
Transfers	-	-	-	-
Currency differences	-	-	(334)	(334)
Provisions for impairment / cancellation	(2,224)	-	700	(1,524)
Closing balance	2,951,158	198,660	972,216	4,122,034
Accumulated depreciation				
Opening balance	(135,398)	(90,625)	(559,871)	(785,894)
Current year depreciation expense	(28,115)	(41,555)	(118,160)	(187,830)
Disposals	9,124	70,956	104,173	184,253
Transfers	-	-	-	-
Currency differences	-	-	334	334
Closing balance	(154,389)	(61,224)	(573,524)	(789,137)
Net book value	2,796,769	137,436	398,692	3,332,897

(*) The Bank revalued its real estates included in tangible fixed assets on 31 December 2024, and the revaluation increase amounting to TL 2,909,225 is included in the additions.

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I. Explanations and notes related to assets of the unconsolidated balance sheet (continued)

Prior period	Real estates	Right-of-use assets	Other fixed assets	Total
Cost				
Opening balance	286,285	264,356	811,302	1,361,943
Additions	16,591	213,420	363,421	593,432
Disposals	(10,125)	(175,619)	(232,115)	(417,859)
Transfers	-	-	-	-
Currency differences	-	-	14	14
Provisions for impairment / cancellation	-	-	6,900	6,900
Closing balance	292,751	302,157	949,522	1,544,430
Accumulated depreciation				
Opening balance	(132,879)	(82,022)	(509,730)	(724,631)
Current year depreciation expense	(6,865)	(44,160)	(96,130)	(147,155)
Disposals	4,370	40,172	132,679	177,221
Transfers	(24)	(4,615)	(86,676)	(91,315)
Currency differences	-	-	(14)	(14)
Closing balance	(135,398)	(90,625)	(559,871)	(785,894)
Net book value	157,353	211,532	389,651	758,536

13. Information on intangible assets (net)

	Current period	Prior period
Cost		
Opening balance	1,392,982	535,724
Additions	1,545,880	1,209,989
Disposals	(49,907)	(352,731)
Closing balance	2,888,955	1,392,982
Accumulated amortization		
Opening balance	(349,000)	(279,441)
Current year's amortization	(214,561)	(72,196)
Disposals	4,084	2,637
Closing balance	(559,477)	(349,000)
Net book value	2,329,478	1,043,982

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I. Explanations and notes related to assets of the unconsolidated balance sheet (continued)

14. Information on investment properties (net)

	Current period	Prior period
Cost		
Openning balance	7,075	-
Purchases	-	-
Transfers	-	7,075
Disposals	(124,556)	-
Change in fair value	117,481	-
Total cost	-	7,075
	Current period	Prior period
Depreciation		
Openning balance	4,346	-
Purchases	-	-
Transfers	-	4,346
Disposals	(4,346)	-
Change in fair value	-	-
Total accumulated depreciation (-)	-	4,346
Net book value	-	2,729

15. Explanations on deferred tax asset

15.1. Explanations on current tax asset

As of 31 December 2024 current tax asset and corporation tax payable are netted of and accounted in the unconsolidated balance sheet, the explanations about current tax asset/liability for the current and previous period are disclosed in Footnote II.9 of Section Five.

15.2. Explanations on deferred tax asset

As of 31 December 2024, the net deferred tax assets of the Bank amounts to TL 1,740,980 (31 December 2023: TL 2,058,754 deferred tax assets) which is calculated based on the deductible temporary differences.

	Current period		Prior period	
Timing differences constituting the basis for deferred tax	Accumulated temporary differences	Deferred tax asset/(liability)	Accumulated temporary differences	Deferred tax asset/(liability)
Provisions (*)	883,396	265,019	521,668	156,500
Fair value differences for financial assets and liabilities	(708,723)	(202,359)	1,090,028	327,330
Derivative valuation differences	2,265,705	679,711	358,416	107,525
Expected credit losses of Stage I and II	713,147	213,944	846,006	253,802
Other (**)	2,713,737	784,665	2,412,342	1,213,597
Total deferred tax assets / (liabilities) net		1,740,980		2,058,754

(*) Consists of reserve for employee benefits, provision for promotion expenses of credit cards and other provisions.

(**) Includes deferred tax assets resulting from inflation adjustments within the scope of the provisions of Provisional Article 33. of the Tax Procedure Law.

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I. Explanations and notes related to assets of the unconsolidated balance sheet (continued)

Deferred tax assets / (liabilities) movements of the current and previous years are as follows:

	Current period (1 January – 31 December 2024)	Prior period (1 January – 31 December 2023)
Deferred tax assets / (liabilities) net		
Opening balance	2,058,754	267,637
Deferred tax income / (expense) (net)	349,654	1,471,439
Deferred tax recognized under equity	(667,428)	319,678
Balance at the end of the period	1,740,980	2,058,754

16. Explanations on assets held for sale and discontinued operations (net)

16.1. Explanations on assets held for sale

	Current period	Prior period
Opening balance (net)	-	660
Additions	33,368	-
Disposals (-)	-	660
Depreciation (-)	-	-
Balance at the end of the period (net)	33,368	-

16.2. Explanations on discontinued operations

The Bank does not have assets with respect to the discontinued operations.

17. Other assets exceed 10% of the balance sheet total (excluding off balance sheet commitments), breakdown of the names and amounts of accounts constructing at least 20% of grand totals

Other assets in the balance sheet excluding off balance sheet commitments do not exceed 10% of the balance sheet total.

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II. Explanations and notes related to liabilities of the unconsolidated balance sheet

1. Information on deposits

1.1 Maturity structure of deposits

Current period	Demand	7 day call accounts	Up to 1 month	1-3 months	3-6 months	6 months – 1 year	1 year and over	Cumulative deposits	Total
Saving deposits	5,873,073	-	32,585,780	20,534,717	5,008,091	1,710,622	2,563,935	-	68,276,218
Foreign currency deposits	14,518,978	-	11,010,183	1,987,654	143,535	173,445	34,124	-	27,867,919
Residents in Turkey	14,363,883	-	10,953,461	1,723,084	135,191	162,747	23,422	-	27,361,788
Residents abroad	155,095	-	56,722	264,570	8,344	10,698	10,702	-	506,131
Public sector deposits	1,307,786	-	-	-	-	-	-	-	1,307,786
Commercial deposits	1,907,413	-	14,310,921	419,961	2,522,790	333,617	-	-	19,494,702
Other institutions deposits	18,782	-	401	12,743	2	-	-	-	31,928
Precious metals deposits	6,226,175	-	1,640,966	-	-	-	-	-	7,867,141
Interbank deposits	41,668	-	6,163,478	-	-	-	50,887	-	6,256,033
Central Bank of Turkey	-	-	-	-	-	-	-	-	-
Domestic banks	29,089	-	-	-	-	-	-	-	29,089
Foreign banks	12,579	-	6,163,478	-	-	-	50,887	-	6,226,944
Participation banks	-	-	-	-	-	-	-	-	-
Other	-	-	-	-	-	-	-	-	-
Total	29,893,875	-	65,711,729	22,955,075	7,674,418	2,217,684	2,648,946	-	131,101,727

"Foreign exchange-protected deposit instrument", the operating rules of which are determined by the Ministry of Treasury and Finance and the CBRT, and which ensures that TL deposits are valued with interest rates and are protected against changes in foreign exchange rates, started to be offered to the Bank's customers. In this context, the total amount of deposits as of 31 December 2024 is TL 5,608,180 (31 December 2023: TL 25,287,156).

Prior period	Demand	7 day call accounts	Up to 1 month	1-3 months	3-6 months	6 months – 1 year	1 year and over	Cumulative deposits	Total
Saving deposits	3,750,845	-	16,624,381	6,697,908	12,908,198	2,207,876	8,164,334	-	50,353,542
Foreign currency deposits	15,364,832	-	6,791,151	2,903,462	200,525	113,400	66,238	-	25,439,608
Residents in Turkey	15,226,253	-	6,719,794	2,656,628	188,573	85,861	57,921	-	24,935,030
Residents abroad	138,579	-	71,357	246,834	11,952	27,539	8,317	-	504,578
Public sector deposits	647,101	-	-	-	-	-	-	-	647,101
Commercial deposits	1,780,948	-	8,243,239	249,009	2,720,624	830,503	648,760	-	14,473,083
Other institutions deposits	14,519	-	3,190	2,521	2	10	7	-	20,249
Precious metals deposits	4,724,453	-	1,011,091	-	-	-	-	-	5,735,544
Interbank deposits	13,721	-	3,665,528	-	-	-	-	-	3,679,249
Central Bank of Turkey	-	-	-	-	-	-	-	-	-
Domestic banks	10,696	-	38,430	-	-	-	-	-	49,126
Foreign banks	3,025	-	3,627,098	-	-	-	-	-	3,630,123
Participation banks	-	-	-	-	-	-	-	-	-
Other	-	-	-	-	-	-	-	-	-
Total	26,296,419	-	36,338,580	9,852,900	15,829,349	3,151,789	8,879,339	-	100,348,376

1.2. Information on saving deposits under the guarantee of saving deposit insurance and exceeding the limit of saving deposit insurance

Saving deposits	Under the guarantee of saving deposit insurance (*)		Exceeding the limit of saving deposit insurance	
	Current period	Prior period	Current period	Prior period
Saving deposit	33,355,098	21,485,153	34,919,134	28,861,062
Foreign currency saving deposits	10,613,781	11,101,913	10,509,253	10,838,409
Other deposits in the form of saving deposits	-	-	-	-
Foreign branches' deposits under foreign authorities' insurance	-	-	-	-
Deposits in off-shore banking regions' under foreign authorities' insurance	-	-	-	-

Commercial deposits (**)	Under the guarantee of saving deposit insurance (*)		Exceeding the limit of saving deposit insurance	
	Current period	Prior period	Current period	Prior period
Commercial deposit	1,362,085	954,699	18,053,547	13,213,929
Foreign currency commercial deposits	388,984	293,763	14,189,828	8,921,352
Other deposits in the form of commercial deposits	-	-	-	-
Foreign branches' deposits under foreign authorities' insurance	-	-	-	-
Deposits in off-shore banking regions' under foreign authorities' insurance	-	-	-	-

(*) The amount of deposits subject to insurance is TL 650 for the current period (Prior period is TL 400).

(**) With the regulation published in the Official Gazette dated 27 August 2022 and numbered 31936, commercial deposits were included in the scope of insurance.

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II. Explanations and notes related to liabilities of the unconsolidated balance sheet (continued)

1.3. Information on whether the saving deposits / private current accounts of real persons not subject to commercial transactions in the Turkey branch of the Bank headquartered abroad are in scope of insurance in the country where the head office is located

The Bank's head office is in Turkey and its saving deposits are covered by saving deposit insurance.

1.4. Saving deposits of real persons not under the guarantee of saving deposit insurance fund

	Current period	Prior period
Deposits and other accounts in foreign branches	-	-
Saving deposits and other accounts of controlling shareholders and their mothers, fathers, spouses, children in care	-	-
Saving deposits and other accounts of president and members of board of directors, general manager and vice presidents, and their mothers, fathers, spouses and children in care	94,765	49,339
Saving deposits and other accounts in scope of the property holdings derived from crime defined in Article 282 of Turkish Criminal Law No: 5237, dated 26 September 2004	-	-
Saving deposits in deposit bank established in Turkey in order to engage solely in off-shore banking activities	-	-

2. Information on derivative financial liabilities held for trading

2.1. Table of negative differences for derivative financial liabilities held for trading

	Current period		Prior period	
	TL	FC	TL	FC
Forward transactions	-	2,289,629	-	245,388
Swap transactions	1,814,005	473,692	1,461,157	248,106
Future transactions	-	-	-	-
Options	-	275,862	-	265,212
Other	-	-	-	-
Total	1,814,005	3,039,183	1,461,157	758,706

3. Banks and other financial institutions

3.1. Information on banks and other financial institutions

	Current period		Prior period	
	TL	FC	TL	FC
Funds borrowed from Central Bank of Turkey	-	-	-	-
Funds borrowed from domestic banks and institutions	-	-	-	997,790
Funds borrowed from foreign banks, institutions and funds	4,103	11,313,927	9,316	12,728,558
Total	4,103	11,313,927	9,316	13,726,348

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II. Explanations and notes related to liabilities of the unconsolidated balance sheet (continued)

3.2. Maturity analysis of funds borrowed

	Current period		Prior period	
	TL	FC	TL	FC
Short term	4,103	4,840,927	9,316	1,134,152
Medium and long term	-	6,473,000	-	12,592,196
Total	4,103	11,313,927	9,316	13,726,348

3.3. Funding industry group where the Bank's liabilities are concentrated

The liabilities providing the funding sources of the Bank are deposits, borrowings, marketable securities issued and money market borrowings. Deposits are the most important funding source of the Bank and the diversification of these deposits by number and type of depositors with a stable structure does not create any risk concentration. The borrowings are composed of funds such as syndicated and post-financing obtained from different financial institutions with different maturity-interest structures and characteristics. There is no risk concentration in any of the funding sources of the Bank.

4. Explanations on securities issued (net)

None (31 December 2023: None).

5. If other liabilities exceed 10% of the balance sheet total, names and amounts of the accounts constituting at least 20% of grand totals

Other liabilities do not exceed 10% of the balance sheet total.

6. Explanations on lease liabilities (net)

	Current period		Prior period	
	Gross	Net	Gross	Net
Less than 1 year	20,489	15,898	52,722	20,863
Between 1-4 years	123,630	77,330	118,360	77,837
More than 4 year	80,322	43,132	191,007	113,610
Total	224,441	136,360	362,089	212,310

7. Information on derivative financial liabilities held for hedging

7.1. Negative differences related to derivative financial liabilities held for hedging

	Current period		Prior period	
	TL	FC	TL	FC
Fair value hedge	-	134,702	-	-
Cash flow hedge	9,245	-	-	-
Net investment hedge	-	-	-	-
Total	9,245	134,702	-	-

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8. Information on provisions

8.1. Information on the exchange rate decrease provision on foreign currency indexed loans and financial lease receivables

None (31 December 2023: None).

8.2. Information on other provisions

	Current period	Prior period
Specific provisions for undrawn non-cash loans (stage 3)	390,810	245,029
Provision for credit card score promotion	3,216	1,902
Other provisions	751,640	465,254
<i>Allowance for expected credit losses (stage 1 and stage 2) (*)</i>	<i>93,173</i>	<i>117,671</i>
<i>Other</i>	<i>658,467</i>	<i>347,583</i>
Total	1,145,666	712,185

(*) Non-cash loan provisions are included.

Amount to TL 126,162 (31 December 2023: TL 110,108) of the other provisions consist of provisions set aside as a result of the legal assessment for the lawsuits that are likely to result against the Bank, and TL 518,000 includes restructuring provisions.

The deposit holders of offshore accounts held at Sümerbank A.Ş. together with other dissolved banks merged into Sümerbank A.Ş., all of which were ultimately merged into the Bank, which were opened before Savings Deposit Insurance Fund (SDIF) seized these banks, initiates lawsuits against the Bank. As a result of these lawsuits, the Bank pays certain amounts to these offshore deposit holders of the dissolved banks. SDIF indemnifies these amounts in accordance with the Share Transfer Agreement (STA) entered into between Turkish Armed Forces Assistance (and Pension) Fund (OYAK) and SDIF.

The mentioned amounts are being paid to the Bank by SDIF with objections and short payments with STA clauses. SDIF has initiated 10 enforcement proceedings against the Bank for the refund of the said payments, requesting 506 million TL excluding interest. As a response to the Bank's objections to the enforcement proceedings initiated by SDIF; SDIF has filed lawsuits for the cancellation of the objections. Although there are currently 6 ongoing lawsuits in this context, our fourth lawsuit amount 109.5 million TL was concluded in favor of the Bank in July 2024, setting a precedent for other ongoing lawsuits. In January 2025, lawsuit with second, third and fifth have been finalized in favour of the Bank with the Turkish Supreme Court's verdict which is going to be a precedent decision for the other ongoing files.

Additionally, the Bank has initiated 16 enforcement proceedings against SDIF regarding our accumulated receivables that SDIF has either partially or completely failed to pay. Based upon SDIF objections, annulment of the objection a lawsuit was filed.

Both SDIF's actions against the Bank and the Bank's actions against the SDIF are presented below as a table:

Lawsuit & Enforcement Proceedings	Amount	Status	The Latest Development in Legal Process
First Case	21,819	Supreme Court	The court of first instance decided in our favor.
Second Case (**)	21,770	Supreme Court	The case was finalized in favor of our Bank.
Third Case (**)	97,677	Supreme Court	The case was finalized in favor of our Bank.
Fourth Case (*)	109,533	Supreme Court	The case was finalized in favor of our Bank.
Fifth Case (**)	981	Supreme Court	The case was finalized in favor of our Bank.
Sixth Case	125,593	Regional Appeal Court	The court of first instance decided in our favor.
Seventh Case	51,536	First Instance Court	The trial continues
Eighth Case	49,070	Supreme Court	The court of first instance decided in our favor.
Ninth Case	20,894	Supreme Court	The court of first instance decided in our favor.
Tenth Case	7,546	Supreme Court	The court of first instance decided in our favor.
	506,419		

(*) The fourth case was concluded in favor of the Bank in July 2024.

(**) In January 2025, lawsuit with second, third and fifth have been finalized in favour of the Bank with the Turkish Supreme Court's verdict which is going to be a precedent decision for the other ongoing files.

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II. Explanations and notes related to liabilities of the unconsolidated balance sheet (continued)

There are 11 SDIF enforcement proceedings as of 31 December 2024. The source of the enforcement proceedings in question stems from the rejection of some offshore cases in favor of the Bank by the Supreme Court on the grounds of statute of limitations. SDIF has made payments to the Bank within the scope of its previous decisions, and is trying to take back the paid amounts, citing the rejection of the case in favor of the Bank due to statute of limitations. The Bank objects to these pursuits.

On the other hand, there is an administrative law dispute between the Bank and SDIF. The Bank has filed a lawsuit for the annulment of the administrative resolution No. 2013/36 dated 31 January 2013 of SDIF's Fund Board (the "SDIF Fund Board Decision"), which constitutes the legal basis of the SDIF's abovementioned actions. Although the first instance administrative court ruled in favor of the Bank to annul the SDIF Fund Board Decision, the Council of State (i.e., the Administrative Supreme Court of Appeals, Danıştay) reversed the first instance court's decision on the grounds that the administrative courts lack jurisdiction because the dispute was a matter of private law and not one of administrative law. The Bank submitted a motion for the post judgment relief, i.e., correction of judgment which the Council of State rejected. Upon completion of the Council of State's review, the first instance court rendered a decision in line with the Council of State's decision against which the Bank (claiming the annulment of the SDIF Fund Board Decision) and SDIF (claiming the determination of the SDIF Fund Board Decision's legal validity by the administrative courts rather than a lack of jurisdiction decision) filed an appeal.

No provisions were set aside in respect of the amounts that the Bank paid in connection with the off-shore lawsuits, court decisions on off-shore lawsuits and lawsuits filed by SDIF, considering the (i) relevant provisions of the SSA, (ii) relevant provisions of the of the Share Sale Agreement dated 18 June 2007 relating to the purchase of the Bank's shares (owned by OYAK) by ING Bank N.V. and (iii) the course of the pending lawsuits against SDIF.

8.3. Information on provisions for employee benefits

As of 31 December 2024, TL 134,028 (31 December 2023: TL 124,827) of TL 273,994 (31 December 2023: TL 215,110) provisions for employee benefits is the unused vacation provisions. Full provision is provided for the unused vacation liability.

TL 139,966 (31 December 2023: TL 90,283) of the provisions for employee benefits is the termination benefit provision. In accordance with the labor law, the Bank is required to make lump-sum payments to employees whose employment is terminated due to retirement or for reasons other than resignation and misconduct. The payments are calculated on the basis of 30 days' pay limited to a maximum of historical TL 41,828.42 (Full TL) at 31 December 2024 and TL 23,489.83 (Full TL) at 31 December 2023 per year of employment at the rate of pay applicable at the date of retirement or termination.

In the unconsolidated financial statements dated 31 December 2024 and 31 December 2023, the Bank operating in Turkey has calculated severance pay by taking into account their experience in personnel service completion or termination, and by discounting it via using the forecasted annual inflation and interest rates.

	Current period	Prior period
Net discount rate	2.98%	3.01%
Inflation rate	24.30%	36.00%
Interest rate	28.00%	40.10%
Probability of severance	29.41%	28.06%

Movement of the provision for termination benefit:

	Current period	Prior period
Balance at the beginning of the period	90,283	85,403
Change during the year	91,381	(28,657)
Actuarial gain	9,355	74,907
Benefits paid during the year	(51,053)	(41,370)
Balance at the end of the period	139,966	90,283

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II. Explanations and notes related to liabilities of the unconsolidated balance sheet (continued)

9. Explanations on tax liability

9.1. Explanations on current tax liability

9.1.1. Explanations on tax provision

The Bank has current corporate tax liability amounting to TL 358,475 in current period (31 December 2023: None).

9.1.2. Information on taxes payable

	Current period	Prior period
Corporate tax payable	358,475	-
Taxation of securities	401,544	75,293
Property tax	2,347	2,010
Banking insurance transaction tax ("BITT")	160,831	71,686
Foreign exchange transaction tax	3,176	2,049
Value added tax payable	43,902	29,986
Other	65,691	35,534
Total	1,035,966	216,558

9.1.3. Information on premiums

	Current period	Prior period
Social security premiums-employee	20,779	14,551
Social security premiums-employer	35,157	24,016
Bank social aid pension fund premium-employee	-	-
Bank social aid pension fund premium-employer	-	-
Pension fund membership fees and provisions-employee	-	-
Pension fund membership fees and provisions-employer	-	-
Unemployment insurance-employee	1,313	931
Unemployment insurance-employer	2,625	1,863
Other	-	-
Total	59,874	41,361

9.2. Explanations on deferred tax liabilities

Deferred tax asset and liability are netted and shown in liabilities of unconsolidated balance sheet as deferred tax liability, and explanations about deferred tax asset / liability for the current and prior period are disclosed in Section Five Footnote I.15.

10. Information on liabilities regarding assets held for sale

As of 31 December 2024 and 31 December 2023, there are no liabilities regarding assets held for sale.

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II. Explanations and notes related to liabilities of the unconsolidated balance sheet (continued)

11. Explanations on the subordinated loans

	Current period		Prior period	
	TL	FC	TL	FC
To be included in the calculation of additional capital borrowing instruments	-	-	-	-
Subordinated loans	-	-	-	-
Subordinated debt instruments	-	-	-	-
Debt instruments to be included in contribution capital calculation (*)	-	5,128,095	-	-
Subordinated loans	-	-	-	-
Subordinated debt instruments	-	5,128,095	-	-
Total	-	5,128,095	-	-

(*) Detailed explanations regarding subordinated debt instruments are included in Footnote I. of Section Four.

12. Information on shareholders' equity

12.1. Paid-in capital

	Current period	Prior period
Common stock (*)	3,486,268	3,486,268
Preferred stock	-	-

(*) The amount represents nominal capital.

12.2. Paid-in capital amount, explanation as to whether the registered share capital system is applicable at bank; if so, the amount of registered share capital ceiling

Paid-in-capital amount is TL 3,486,268 and registered share capital system is not applied.

12.3. Information on share capital increases and their sources; other information on increased capital shares in current period

None.

12.4. Information on share capital increases from capital reserves

There is no capital increase from capital reserves in the current period.

12.5 Capital commitments in the last fiscal year and in the interim period following the last fiscal year, the general purpose of these commitments and projected resources required to meet these commitments

There are no capital commitments in the last fiscal year and in the interim period following the last fiscal year.

12.6. Indicators of the Bank's income, profitability and liquidity for the previous periods and possible effects of future assumptions made by taking into account the uncertainties of these indicators on the Bank's equity:

The Bank's balance sheet is managed in a conservative manner in order to be minimally affected by interest, currency and credit risks. The Bank's operations are aimed to be continued with a conservative approach and with an increasing profitability. The year end income is transferred to the statutory reserves and extraordinary reserves under the shareholder's equity. The Bank tries to invest the majority of its shareholder's equity in interest bearing assets and to keep investments in non-banking assets such as tangible assets, investments in non-financial subsidiaries limited.

12.7. Information on preferred shares

There are no preferred shares.

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II. Explanations and notes related to liabilities of the unconsolidated balance sheet (continued)

12.8. Information on marketable securities revaluation reserve

	Current period		Prior period	
	TL	FC	TL	FC
From associates, subsidiaries, and entities under common control (business partnerships)	-	-	-	-
Valuation difference	(239,079)	-	(547,073)	-
Foreign exchange difference	-	-	-	-
Total	(239,079)	-	(547,073)	-

12.9. Profit reserves and profit distribution

Under the Turkish Commercial Code (“TCC”), legal reserves consist of first legal reserve and second legal reserve. First legal reserve, appropriated at the rate of 5%, until the total reserve is equal to 20% of issued and fully paid-in share capital. Second legal reserve, appropriated at the rate of at least 10% of distributions in excess of 5% of issued and fully paid-in share capital.

As per the decision made at the annual general assembly of shareholders of the Bank on 26 March 2024, the distribution of the net profit of the year 2023, is as follows.

Profit distribution table of 2023	
2023 net profit	1,698,038
A – I. Legal Reserve (TCC 519/A) 5%	(84,902)
B – The First Dividend for Shareholders	-
C – Extraordinary Reserves	(1,611,678)
D – Special funds	(1,458)

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III. Explanations and notes related to unconsolidated off-balance sheet accounts

1. Explanations on off-balance sheet commitments

1.1. Type and amount of irrevocable commitments

	Current period	Prior period
Forward asset purchase commitments	2,837,178	16,172,073
Forward deposit purchase and sales commitments	-	36,000
Loan granting commitments	10,656,338	3,324,152
Commitments for cheque payments	310,617	243,467
Commitments for credit card limits	2,520,362	1,577,760
Commitments for credit cards and banking services promotions	23,893	19,939
Other irrevocable commitments	35,799	33,972
Total	16,384,187	21,407,363

1.2. Type and amount of probable losses and obligations arising from off-balance sheet items

1.2.1 Non-cash loans including guarantees, bank acceptances, collaterals and others deemed as financial commitments and other letter of credits

	Current period	Prior period
Commitments and contingencies	11,793,820	5,487,458
Letter of credits	6,144,774	2,118,931
Bank acceptance loans	226,116	4,808
Total	18,164,710	7,611,197

1.2.2. Irrevocable guarantees, temporary guarantees and other similar commitments and contingencies

	Current period	Prior period
Irrevocable letters of guarantees	11,016,491	10,057,924
Cash loans letters of guarantees	1,237,043	1,253,981
Advance letters of guarantees	1,205,583	1,494,368
Temporary letters of guarantees	422,926	41,140
Other	153,678	141,089
Total	14,035,721	12,988,502

1.3. Explanation on non-cash loans

1.3.1. Total amount of non-cash loans

	Current period	Prior period
Non-cash loans given against cash loans	13,025,913	6,725,673
<i>With original maturity of 1 year or less than 1 year</i>	2,715,367	253,844
<i>With original maturity of more than 1 year</i>	10,310,546	6,471,829
Other non-cash loans	19,174,518	13,874,026
Total	32,200,431	20,599,699

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III. Explanations and notes related to unconsolidated off-balance sheet accounts (continued)

1.3.2. Information on sectoral risk concentrations of non-cash loans

	Current period				Prior period			
	TL	(%)	FC	(%)	TL	(%)	FC	(%)
Agriculture	85,559	1.03	-	-	895	0.02	-	-
Farming and raising	85,506	1.03	-	-	842	0.02	-	-
Forestry	34	-	-	-	34	-	-	-
Fishing	19	-	-	-	19	-	-	-
Manufacturing	3,805,392	45.78	6,028,006	25.23	793,035	22.00	4,680,584	27.54
Mining	13,236	0.16	-	-	14,154	0.39	406,371	2.39
Production	3,786,864	45.56	6,028,006	25.23	770,261	21.37	4,186,096	24.63
Electric, gas and water	5,292	0.06	-	-	8,620	0.24	88,117	0.52
Construction	187,973	2.26	3,691,844	15.46	157,641	4.37	2,408,767	14.17
Services	4,230,477	50.89	14,153,509	59.25	2,650,076	73.52	9,888,532	58.19
Wholesale and retail trade	2,628,184	31.62	955,018	4.00	1,993,718	55.31	649,798	3.82
Hotel, food and beverage	31,530	0.38	-	-	12,957	0.36	-	-
Transportation and telecommunication	275,731	3.32	2,114,435	8.85	182,817	5.07	1,874,183	11.03
Financial institutions	1,247,671	15.01	6,541,980	27.38	407,341	11.30	4,611,448	27.14
Real estate and renting services	19,251	0.23	1,743,630	7.30	28,671	0.80	930,812	5.48
Self-employment services	27,707	0.33	2,798,446	11.72	24,069	0.67	1,404,331	8.26
Education services	-	-	-	-	-	-	-	-
Health and social services	403	-	-	-	503	0.01	417,960	2.46
Other	3,496	0.04	14,175	0.06	3,114	0.09	17,055	0.10
Total	8,312,897	100.00	23,887,534	100.00	3,604,761	100.00	16,994,938	100.00

1.3.3. Non-cash loans classified in Group I and Group II

	Group I		Group II	
	TL	FC	TL	FC
Non-cash loans	8,288,598	22,462,890	5,501	-
Letter of guarantees	3,895,628	8,691,150	5,501	-
Bank acceptances	-	226,116	-	-
Letter of credits	3,387,970	2,756,804	-	-
Endorsements	-	-	-	-
Underwriting commitments	-	-	-	-
Factoring commitments	-	-	-	-
Other	1,005,000	10,788,820	-	-

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III. Explanations and notes related to unconsolidated off-balance sheet accounts (continued)

2. Information on derivative transactions

	Current period	Prior period
Types of hedging transactions		
Fair value hedges (I)	7,072,350	-
Purchase transactions	3,536,175	-
Sale transactions	3,536,175	-
Cash flow hedges (II)	5,350,000	300,000
Purchase transactions	2,675,000	150,000
Sale transactions	2,675,000	150,000
Net investment hedges (III)	-	-
Purchase transactions	-	-
Sale transactions	-	-
A. Total derivatives held for hedging (I+II+III)	12,422,350	300,000
Derivative transactions held for trading		
Trading transactions (I)	176,522,260	222,926,715
Forward foreign currency transactions – buy	33,810,571	37,211,129
Forward foreign currency transactions – sell	35,874,097	35,195,294
Swap transactions- buy	38,776,271	59,571,396
Swap transactions – sell	39,560,445	61,049,850
Foreign currency options – buy	14,250,438	14,949,523
Foreign currency options – sell	14,250,438	14,949,523
Foreign currency futures – buy	-	-
Foreign currency futures – sell	-	-
Interest rate derivatives (II)	268,813,626	119,762,700
Interest rate swap - buy	134,406,813	59,881,350
Interest rate swap - sell	134,406,813	59,881,350
Interest rate options - buy	-	-
Interest rate options - sell	-	-
Securities options - buy	-	-
Securities options - sell	-	-
Interest futures - buy	-	-
Interest futures - sell	-	-
Other trading derivative transactions (III)	-	-
B. Total derivative transactions held for trading (I+II+III)	445,335,886	342,689,415
Total derivative transactions (A+B)	457,758,236	342,989,415

3. Information on credit swaps and related risks

As of 31 December 2024 and 31 December 2023, there are no credit derivative transactions.

4. Information on contingent liabilities and assets

As of 31 December 2024, a total provision of TL 126,162 (31 December 2023: TL 110,108) separated other provisions are under the item, considering legal assessment for the lawsuits with a high probability of resulting against the Bank and as a result of the audits of public authorities.

5. Information on the services provided on behalf of others

Related information is provided in Section Four Footnote IX.

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IV. Explanations and notes related to unconsolidated statement of profit or loss

1. Information on interest income

1.1. Information on interest income from loans (*)

	Current period		Prior period	
	TL	FC	TL	FC
Short term loans	9,785,854	1,320,922	6,817,261	1,113,634
Medium and long term loans	11,435,607	711,690	3,623,152	902,038
Interest on loans under follow-up	169,088	-	159,166	-
Premiums received from resource utilization support fund	-	-	-	-
Total	21,390,549	2,032,612	10,599,579	2,015,672

(*) Commissions and fees received from cash loans are included.

1.2. Information on interest income received from banks

	Current period		Prior period	
	TL	FC	TL	FC
From Central Bank of Turkey	-	454	-	11,188
From domestic banks	205,374	20,878	17,610	1,012
From foreign banks	15	79,189	249	78,597
From branches abroad	-	-	-	-
Total	205,389	100,521	17,859	90,797

1.3. Information on interest income received from marketable securities portfolio

	Current period		Prior period	
	TL	FC	TL	FC
Financial assets measured at fair value through profit or loss	278,563	14,411	21,839	14,933
Financial assets measured at fair value through other comprehensive income	1,527,951	-	668,062	-
Financial assets measured at amortised cost	4,678,822	-	1,767,575	-
Total	6,485,336	14,411	2,457,476	14,933

As stated in Section Three disclosure VII, the Bank has inflation indexed ("CPI") government bonds in its financial assets measured at fair value through other comprehensive income and financial assets measured at amortized cost portfolios. The reference indices used for the real interest payments about these marketable securities is determined based on the CPI's of two months before. The Bank determines the estimated inflation rates used for valuation of securities in line with this. The estimated inflation rate used is updated during the year when necessary. At the end of the year, the actual inflation rate is used. As of 31 December 2024, an annual rate of 48.58% has been taken into account for the inflation rate used in the valuation of these securities.

1.4 Information on interest income received from associates and subsidiaries

	Current period	Prior period
Interest income from associates and subsidiaries	143,183	84,303

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IV. Explanations and notes related to unconsolidated statement of profit or loss (continued)

2. Information on interest expenses

2.1. Information on interest on funds borrowed (*)

	Current period		Prior period	
	TL	FC	TL	FC
Banks	8,237	842,784	5,013	904,000
Central Bank of Turkey	-	-	-	-
Domestic banks	-	39,559	3,647	35,482
Foreign banks	8,237	803,225	1,366	868,518
Branches and offices abroad	-	-	-	-
Other institutions	-	68,522	-	48,259
Total	8,237	911,306	5,013	952,259

(*) Commissions and fees paid for cash funds borrowed are included.

2.2. Information on interest expenses paid to associates and subsidiaries

	Current period	Prior period
Interest expenses paid to associates and subsidiaries	37,227	109,689

2.3. Information on interest on securities issued

	Current period		Prior period	
	TL	FC	TL	FC
Interest on securities issued	-	121,974	33,858	-

2.4. Allocation of interest expenses on deposits according to maturity of deposits

Account name	Demand deposit	Time deposit					Accumulated deposits	Total
		Up to 1 month	Up to 3 months	Up to 6 months	Up to 1 year	More than 1 year		
Turkish lira								
Bank deposits	-	1,740,318	-	-	-	-	-	1,740,318
Saving deposits	-	11,739,594	5,249,843	3,841,898	2,021,794	1,260,071	-	24,113,200
Public sector deposits	-	4,099	-	-	-	-	-	4,099
Commercial deposits	-	4,094,811	150,748	171,578	52,905	-	-	4,470,042
Other deposits	-	492	2,748	-	-	-	-	3,240
7 days call accounts	-	-	-	-	-	-	-	-
Total	-	17,579,314	5,403,339	4,013,476	2,074,699	1,260,071	-	30,330,899
Foreign currency								
Foreign currency deposits	-	46,579	12,234	741	390	250	-	60,194
Banks deposits	-	986	-	-	-	-	-	986
7 days call accounts	-	-	-	-	-	-	-	-
Precious metal deposits	-	505	-	-	-	-	-	505
Total	-	48,070	12,234	741	390	250	-	61,685
Grand total	-	17,627,384	5,415,573	4,014,217	2,075,089	1,260,321	-	30,392,584

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IV. Explanations and notes related to unconsolidated statement of profit or loss (continued)

3. Information on dividend income

	Current period	Prior period
Financial assets at fair value through profit and loss	-	-
Financial assets at fair value through other comprehensive income	1,373	661
Other	70,189	-
Total	71,562	661

4. Information on trading income/loss (net)

	Current period	Prior period
Income	117,726,874	57,097,416
Gains on capital market transactions	188,314	259,436
Gains on derivative financial instruments	98,661,757	41,649,225
Foreign exchange gains	18,876,803	15,188,755
Loss (-)	(116,534,151)	(54,695,267)
Loss on capital market transactions	(1,028,202)	(272,987)
Loss on derivative financial instruments	(90,157,730)	(37,213,806)
Foreign exchange loss	(25,348,219)	(17,208,474)

Net profit on derivative financial instruments recognized in profit / loss resulting from fluctuations in foreign exchange rates is TL 8,719,735 (31 December 2023: TL 5,481,688 net profit).

5. Information on other operating income

	Current period	Prior period
Income from reversal of prior years' provisions	853,173	1,017,469
Income arising from sale of assets	234,418	116,322
Banking services income	7,602	4,055
Other non-interest income	168,164	114,466
Total	1,263,357	1,252,312

6. Allowance for expected credit losses and other provision expenses

	Current period	Prior period
Expected credit losses	652,781	621,202
12 Months expected credit loss (Stage 1)	118,099	107,030
Expected credit loss significant increase in credit risk (Stage 2)	97,764	61,118
Expected credit loss impaired credits (Stage 3)	436,918	453,054
Impairment losses on securities	22,653	526
Financial assets measured at fair value through profit/loss	22,653	526
Financial assets measured at fair value through other comprehensive income	-	-
Impairment losses on associates, subsidiaries and joint-ventures	-	-
Associates	-	-
Subsidiaries	-	-
Joint ventures	-	-
Other	631,384	260,311
Total	1,306,818	882,039

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IV. Explanations and notes related to unconsolidated statement of profit or loss (continued)

7. Information on other operating expenses

	Current period	Prior period
Reserves for employee termination benefits	47,988	25,681
Bank social aid fund deficit provision	-	-
Tangible assets impairment expense	-	-
Depreciation expense of tangible assets	187,830	147,155
Intangible assets impairment expense	-	-
Goodwill impairment expense	-	-
Amortisation expense of intangible assets	210,205	69,554
Impairment expense of equity participations for which equity method is applied	-	-
Impairment expense for securities that to be disposed	-	-
Depreciation expense of securities that to be disposed	-	-
Impairment expense of held for sale tangible assets and discontinued operations	-	-
Other operating expenses	3,833,176	2,872,289
Operating lease expenses related with TFRS 16 exception	129,681	72,857
Repair and maintenance expenses	142,252	94,166
Advertisement expenses	536,199	411,018
Other expenses	3,025,044	2,294,248
Loss on sales of assets	25,091	6,445
Other (*)	1,012,532	653,650
Total	5,316,822	3,774,774

(*) Includes saving-deposits-insurance-fund related expenses of TL 336,248 (31 December 2023: TL 246,788).

8. Information on income / (loss) before taxes for continued and discontinued operations

As of 31 December 2024, the income before taxes is TL 2,477,897 (31 December 2023: TL 492,361).

9. Information on tax provision for continued and discontinued operations

As of 31 December 2024, the corporate tax provision expense for the period is TL 592,416 (31 December 2023: TL 265,762), and the net deferred tax income is TL 349,654 (31 December 2023: TL 1,471,439 deferred tax income).

10. Information on net operating income after taxes for continued and discontinued operations

As of 31 December 2024, the net operating income after taxes is TL 2,235,135 (31 December 2023: TL 1,698,038).

11. The explanations on net income/loss for the period

Interest income from regular banking transactions is TL 39,611,527 (31 December 2023: TL 17,894,168), while the interest expense is TL 31,883,086 (31 December 2023: TL 15,401,365).

There are no changes in estimations related to the items in the financial statements.

12. If the other items in the statement of profit or loss exceed 10% of the statement of profit or loss total, explanations on the sub-accounts amounting to at least 20% of these items

Other fees and commissions received amounting to TL 2,027,189 (31 December 2023: TL 1,105,887) has included TL 437,811 (31 December 2023: TL 268,258) resulting from the credit card fees and commissions, TL 185,210 (31 December 2023: TL 96,709) resulting from service fees and commissions from contracted merchants and TL 404,099 (31 December 2023: TL 247,790) resulting from insurance commissions.

Other fees and commissions paid amounting to TL 705,964 (31 December 2023: TL 392,665) has included TL 427,494 (31 December 2023: TL 213,020) resulting from credit card exchange commissions.

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IV. Explanations and notes related to unconsolidated statement of profit or loss (continued)

13. Fees related with the services provided by independent auditors/independent audit agencies

In accordance with the decision made by Public Oversight Accounting and Auditing Standards Authority dated 26 March 2021, fees, based on the given reporting period, in relation to the services provided by independent auditors or independent audit firms excluding value added tax costs are presented in the following table.

	Current period	Prior period
Independent audit fees in the reporting period	11,137	7,483
Fees for tax advisory	210	-
Fees for other assurance services	7,195	279
Fees for other services except independent audit	-	-
Total	18,542	7,762

V. Explanations and notes related to unconsolidated statement of changes in shareholders' equity

Under the Turkish Commercial Code ("TCC"), legal reserves comprise of first legal reserve and second legal reserve. First legal reserve, appropriated at the rate of 5%, until the total reserve is equal to 20% of issued and fully paid-in share capital. Second legal reserve, appropriated at the rate of at least 10% of distributions in excess of 5% of issued and fully paid-in share capital.

The Ordinary General Assembly Meeting of the Bank was held on 26 March 2024. In the Ordinary General Assembly meeting, it was decided to transfer TL 1,698,038 unconsolidated net income from 2023 operations to statutory legal reserves, extraordinary reserves and revaluation surplus on tangible and intangible assets as a real estate sale income and utilized from the tax exemption amounting to TL 84,902 TL 1,611,678 and TL 1,458 respectively.

General Assembly of the Bank is authorized body for the profit appropriation decisions. The Ordinary General Assembly Meeting has not been held as of the date of these financial statements.

As of the balance sheet date, unconsolidated legal reserves amount to TL 648,464 (31 December 2023: TL 563,562), and TL , 84,902 (31 December 2023: TL 131,314) of this amount consists of the amount transferred from the previous year profit within the current period.

As of the balance sheet date, extraordinary reserves amount to TL 10,718,630 (31 December 2023: TL 8,931,180).

VI. Explanations and notes related to the unconsolidated statement of cash flows

1. Information on cash flow statements

Components of cash and cash equivalents are cash, cash in foreign currency, money in transit, cheques purchased, demand deposits including unrestricted deposits in the Central Bank of Turkey and time deposits in banks with original maturities less than three months.

1.1. Cash and cash equivalents at the beginning of the period

	31 December 2023	31 December 2022
Cash	2,716,520	3,003,009
Cash in vault	180,874	160,443
Cash in foreign currency	2,535,646	2,842,566
Cash equivalents	23,829,883	9,862,463
Central Bank of Turkey	15,002,152	5,782,879
Banks	319,474	1,582,593
Interbank money market	8,508,257	2,496,991
Total	26,546,403	12,865,472

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VI. Explanations and notes related to the unconsolidated statement of cash flows (continued)

1.2. Cash and cash equivalents at the end of period

	31 December 2024	31 December 2023
Cash	2,902,989	2,716,520
Cash in vault	318,868	180,874
Cash in foreign currency	2,584,121	2,535,646
Cash equivalents	43,596,869	23,829,883
Central Bank of Turkey	23,075,474	15,002,152
Banks	247,719	319,474
Interbank money market	20,273,676	8,508,257
Total	46,499,858	26,546,403

2. Explanation about other line items included in the cash flow and about the effect of changes in foreign exchange rates on cash and cash equivalents line item included in the cash flow statement:

Amounting to TL 1,263,357 increase (31 December 2023: TL 1,252,312 increase) under "Operating profit before changes in operating assets and liabilities" consists of other operational incomes.

Amounting to TL 346,441 increase (31 December 2023: TL 983,716 increase) under "Operating profit before changes in operating assets and liabilities" consists of profit / loss from capital market transactions, profit/loss from derivative transactions and other operational expenses.

Amounting to TL 1,005,212 increase (31 December 2023: TL 4,548,900 decrease) under "Changes in operating assets and liabilities" consists of mainly changes in prepaid expenses and changes in exchange accounts under other assets.

Amounting to TL 5,280,919 increase (31 December 2023: TL 2,183,229 decrease) under "Changes in operating assets and liabilities" consists of mainly changes in fees and commissions obtained in advance and changes in exchange account under other liabilities.

"Other" item amounting to TL 1,500,057 (31 December 2023: TL 859,895) included in "Net cash flow from investment activities" includes purchases and sales of intangible assets.

As of 31 December 2024, the effect of changes in the foreign currency rates on the cash and cash equivalents has been determined by the sum of exchange rate differences of translation into TL of cash and cash equivalents denominated in foreign currency in the beginning and the end of the period quarterly and as approximately TL 2,632,788 (31 December 2023: TL 4,661,537).

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VII. Explanations and notes related to risk group of the Bank

1. Volume of related party transactions, income and expense amounts involved and outstanding loan and deposit balances

1.1. Current period

Risk group of the Bank	Subsidiaries, associates and joint ventures (business partnerships)		Direct and indirect shareholders of the Bank		Other entities included in the risk group	
	Cash	Non-cash	Cash	Non-cash	Cash	Non-cash
Loans						
Beginning of the period	787,618	611	65	1,956,949	1,477	1,255,729
End of the period	450,826	652	78	717,961	34,996	772,127
Interest and commission income	143,183	191,136	-	4,050	-	3,292

1.2 Prior period

Risk group of the Bank	Subsidiaries, associates and joint ventures (business partnerships)		Direct and indirect shareholders of the Bank		Other entities included in the risk group	
	Cash	Non-cash	Cash	Non-cash	Cash	Non-cash
Loans						
Beginning of the period	705,641	611	56	1,210,575	1,486	530,274
End of the period	787,618	611	65	1,956,949	1,477	1,255,729
Interest and commission income	84,303	118,356	-	7,635	-	2,871

1.3. Information on deposit balances of the risk group of the Bank

Risk group of the Bank	Subsidiaries, associates and joint ventures (business partnerships)		Direct and indirect shareholders of the Bank		Other entities included in the risk group	
	Current period	Prior period	Current period	Prior period	Current period	Prior period
Deposit						
Beginning of the period	69,089	236,191	3,633,508	451,807	46,691	113,158
End of the period	502,310	69,089	6,233,751	3,633,508	159,059	46,691
Interest expense on deposits	37,227	88,494	1,620,823	310,262	76,225	19,999

1.4. Information on forward and option agreements and other similar agreements entered into with the risk group of the Bank

Risk group of the Bank	Subsidiaries, associates and joint ventures (partnerships)		Direct and indirect shareholders of the Bank		Other entities included in the risk group	
	Current period	Prior period	Current period	Prior period	Current period	Prior period
Transactions at fair value through profit / loss						
Beginning of the period	305,897	100,000	45,124,087	31,915,187	-	-
End of the period	119,431	305,897	100,346,666	45,124,087	-	-
Total profit/loss	(14,978)	4,000	796,052	37,960	88,454	(8,426)
Transactions with hedging purposes						
Beginning of the period	-	-	-	-	-	-
End of the period	-	-	7,072,350	-	-	-
Total profit/loss	-	-	(39,041)	(7,072)	-	-

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VII. Explanations and notes related to risk group of the Bank (continued)

1.5. Information on placements made with the risk group of the Bank

Risk group of the Bank	Subsidiaries, associates and joint ventures (partnerships)		Direct and indirect shareholders of the Bank		Other entities included in the risk group	
	Current period	Prior period	Current period	Prior period	Current period	Prior period
Banks						
Beginning of the period	-	-	133,260	1,169,959	35,671	55,904
End of the period	-	-	659,530	133,260	87,850	35,671
Interest income received	-	-	15	248	-	-

1.6. Information on loans borrowed from the risk group of the Bank

Risk group of the Bank	Subsidiaries, associates and joint ventures (partnerships)		Direct and indirect shareholders of the Bank		Other entities included in the risk group	
	Current period	Prior period	Current period	Prior period	Current period	Prior period
Loans						
Beginning of the period	658,069	-	43,203	432,789	9,316	18,304
End of the period	1,175,042	658,069	-	43,203	4,103	9,316
Interest and commission paid	-	21,195	2	9,890	2,295	1,364

1.7 Information regarding benefits provided to the Bank's top management:

Benefits paid to key management personnel for the period ended as of 31 December 2024 is amounting to TL 195,114 (31 December 2023: TL 117,724).

VIII. Explanations and notes related to the domestic, foreign, off-shore branches and foreign representatives of the Bank

	Number	Number of employees
Domestic branches	59	1,924
Country		
Foreign representative offices	-	-
Total assets		
Foreign branches	-	-
Off-shore banking region branches	-	-
Capital		
Foreign branches	-	-
Off-shore banking region branches	-	-

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Section six

Other Explanations

I. Other explanations on the Bank's operations

None.

II. Explanations and notes related to subsequent events

İlker Kayseri, who has been serving as the Treasury Executive Vice President at the Bank, has been appointed as the Head of ING Belgium Group Treasury, effective as of 1 January 2025.

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Section seven

Independent auditors’ report

I. Explanations on the independent auditors’ report

The unconsolidated financial statements of the Bank as of 31 December 2024, have been audited by Güney Bağımsız Denetim ve Serbest Muhasebeci Mali Müşavirlik A.Ş. (a member firm of Ernst&Young Global Limited) and the independent auditors’ report dated 11 February 2025 is presented at the beginning of this report.

II. Explanations on the independent auditors’ report

There are no other significant footnotes and explanations related to the operations of the Bank that is not mentioned above.