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

ING Bank A.Ş. and Its Financial Subsidiaries

Publicly Announced Consolidated Financial Statements, Related Disclosures and Independent Auditors' Report Thereon as of and for the Year Ended 31 December 2019

7 February 2020

This report consists 4 pages of "Independent Auditors' Report" and 108 pages of consolidated financial statements and its disclosures and footnotes.

Convenience Translation of the Independent Auditors' Report Originally Prepared and Issued in Turkish to English (See Note I in Section Three)

To the General Assembly of ING Bank Anonim Şirketi

A) Report on the Audit of the Consolidated Financial Statements

Opinion

We have audited the accompanying consolidated financial statements of ING Bank Anonim Şirketi ("the Bank") and its financial subsidiaries (together the "Group") which comprise the consolidated balance sheet as at 31 December 2019 and the consolidated statements of profit or loss, profit or loss and other comprehensive income, changes in shareholders' equity, cash flows for the year then ended, and notes, comprising significant accounting policies and other explanatory information.

In our opinion, the accompanying consolidated financial statements present fairly, in all material respects, the consolidated financial position of ING Bank Anonim Şirketi and its consolidated financial subsidiaries as at 31 December 2019, and its consolidated financial performance and its consolidated cash flows for the year then ended in accordance with the "Banking Regulation and Supervision Board Accounting and Reporting Legislation" which includes the "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 Board and circulars and interpretations published by Banking Regulation and Supervision Agency ("BRSA") and requirements of Turkish Financial Reporting Standards ("TFRS") for the matters not regulated by the aforementioned legislations.

We conducted our audit in accordance with the "Regulation on Independent Audit of the Banks" ("BRSA Audit Regulation") published in the Official Gazette No.29314 dated 2 April 2015 by BRSA and Independent Standards on Auditing which is a component of the Turkish Auditing Standards ("TSA"s) published 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 Consolidated Financial Statements section of our report. We are independent of the Group in accordance with the POA's Code of Ethics for Independent Auditors ("Code of Ethics") together with the ethical requirements that are relevant to our audit of the consolidated financial statements in Turkey, and we have fulfilled our other ethical responsibilities in accordance with these requirements and 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 judgment, were of most significance in our audit of the consolidated financial statements of the current period. These matters were addressed in the context of our audit of the consolidated financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

Impairment of loans, lease and factoring receivables measured at amortised cost

Refer to Section III, No: VII to the consolidated financial statements relating to the details of accounting policies and significant judgments of for impairment of loans measured at amortised cost.

Key audit matter	***How the matter is addressed in our audit***
As of 31 December 2019, loans measured at amortised cost comprise 62% of the Group's total assets. The Group recognizes its loans measured at amortised cost in accordance with the Regulation on the Procedures and Principles for Classification of Loans by Banks and Provisions to be set aside (the "Regulation") published on the Official Gazette No. 29750 dated 22 June 2016 which became effective on 1 January 2018 and TFRS 9 Financial Instruments standard ("Standard"). The Group applies the "expected credit loss model" in determining the impairment of financial assets in accordance with the Regulation and Standard. The model which contains significant assumptions and estimates is reviewed by the Bank management annually. The significant assumptions and estimates of the Group's management are as follows: - significant increase in credit risk - incorporating the forward looking macroeconomic information in calculation of credit risk - design and implementation of expected credit loss model The determination of the impairment of loans measured at amortised cost depends on the credit default status, the model based on the change in the credit risk at the first recognition date and the classification of the loans measured at amortised cost according to the model. Establishing an accurate classification is a significant process as the calculation of expected credit loss varies to the staging of the financial assets. The Group estimates expected credit losses on both an individual and a collective basis. Individual provisions consider the estimated future performance of the business and the market value of the collateral provided for credit transactions.	Our procedures for auditing the expected credit losses on loans include below: • We tested the design and operating effectiveness of the controls on lending, collateralization, collection, follow-up, classification and impairment procedures are tested with the involvement of information risk management specialists. • We evaluated the adequacy of the subjective and objective criteria that is defined in the Group's impairment accounting policy compared with the Regulation and Standard. • We evaluated the Group's business model and methodology and the evaluation of the calculations carried out with the control testing and detail analysis by the involvement of specialist. • We performed loan reviews for selected loan samples which include a detailed examination of loan files and related information and evaluation of their classification. In this context, the current status of the loan customer has been evaluated by including forward looking information and macroeconomic expectations. • We evaluated the adequacy of the expected credit loss calculations by selecting sample for the loans which are assessed on individual basis. • We tested the accuracy and completeness of the data in calculation of the data in the calculation models for the loans which are assessed on collective basis. We recalculated the expected credit loss calculation. The models used for the calculation of the risk parameters were examined and the risk parameters for the selected sample portfolios were recalculated. • We assessed the macroeconomic models which are used to reflect forward looking expectations and tested the effect of the risk parameters by recalculation method. • We evaluated the subjective and objective criteria which are used in determining the significant increase in credit risk.

The collective basis expected credit loss calculation is based on processes which are modelled by using current and past data sets and incorporating the future expectations. Impairment on loans calculation is determined as a key audit matter, due to the significance of the estimates and the level of judgments and its complex structure as explained above.	• Additionally, we also evaluated the adequacy of the disclosures in the consolidated financial statements related to impairment provisions.

Responsibilities of Management and Those Charged with Governance for the Consolidated Financial Statements

Management is responsible for the preparation and fair presentation of these consolidated 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 consolidated financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the consolidated financial statements, management is responsible for assessing the Group'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 Group or to cease operations, or has no realistic alternative but to do so.

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

Auditors' Responsibilities for the Audit of the Consolidated Financial Statements

Responsibilities of auditors in an audit are as follows:

Our objectives are to obtain reasonable assurance about whether the consolidated financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditors' 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 Regulation and TSAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error. Misstatements 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 consolidated financial statements.

As part of an audit in accordance with BRSA Audit Regulation and TSAs, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the consolidated 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 Group'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 Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditors' report to the related disclosures in the consolidated 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 auditors' report. However, future events or conditions may cause the Group to cease to continue as a going concern.

- Evaluate the overall presentation, structure and content of the consolidated financial statements, including the disclosures, and whether the consolidated financial statements represent the underlying transactions and events in a manner that achieves fair presentation.
- Obtain sufficient appropriate audit evidence regarding the financial information of the entities or business activities within the Group to express an opinion on the consolidated financial statements. We are responsible for the direction, supervision and performance of the group audit. We remain solely responsible for our audit opinion.

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 governance with a statement that we have complied with relevant ethical requirements regarding independence, and 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 consolidated financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditors' 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.

B) Report on Other Legal and Regulatory Requirements

1) Pursuant to the fourth paragraph of Article 402 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 for the period 1 January - 31 December 2019 are not in compliance with TCC and provisions of the Bank's articles of association in relation to financial reporting.

2) Pursuant to the fourth paragraph of Article 402 of the TCC; the Board of Directors provided us the necessary explanations and required documents in connection with the audit.

Additional paragraph for convenience translation to English:

The accounting principles summarized in Note I Section Three, differ from the accounting principles generally accepted in countries in which the accompanying consolidated financial statements are to be distributed and International Financial Reporting Standards ("IFRS"). Accordingly, the accompanying consolidated financial statements are not intended to present the financial position and results of operations in accordance with accounting principles generally accepted in such countries of users of the consolidated financial statements and IFRS.

KPMG Bağımsız Denetim ve Serbest Muhasebeci Mali Müşavirlik Anonim Şirketi
A member firm of KPMG International Cooperative

Funda Aslanoğlu, SMMM
Partner

7 February 2020
İstanbul, Turkey

The consolidated year end financial report of ING Bank A.Ş. and it's financial subsidiaries prepared as of and for the year ended 31 December 2019

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The consolidated 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 Parent Bank
- Consolidated financial statements of the Parent Group
- Explanations on accounting policies applied in the related period
- Information on financial structure and risk management of the Group
- Explanations and notes related to consolidated financial statements
- Other explanations
- Independent Auditors' report

Investment in associates, joint ventures, direct and indirect subsidiaries whose financial statements have been consolidated in this report are as follows.

Subsidiaries	**Investments in associates**	**Joint ventures**
1. ING European Financial Services Plc.	None	None
2. NG Finansal Kiralama A.Ş.		
3. ING Faktoring A.Ş.		
4. ING Menkul Değerler A.Ş.		

The accompanying year end consolidated 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	A. Canan EDİBOĞLU	K. Atıl ÖZUS	M. Gökçe ÇAKIT
Chairman of the Board	Deputy CEO / Board Member	CFO	Financial Reporting and Tax Director

M. Semra KURAN	Adrianus J. A. KAS
Chairman of the Audit Committee	Audit Committee Member

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

Name-Surname/Title	:	M. Gökçe ÇAKIT / Director
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Section one

General information

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

The foundations of ING Bank A.Ş. ("The Parent 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 Parent 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 third and fourth 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 transfer 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 Parent Bank and continue its banking operations under the Parent 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 Parent 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 Parent Bank from "Oyak Bank A.Ş." to "ING Bank A.Ş." effective from 7 July 2008. The Articles of Association of the Parent 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.

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

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

The main shareholders and capital structure as of 31 December 2019 and 31 December 2018 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 2019, the Parent Bank's paid-in capital consists of 3,486,267,797 shares with a nominal value of TL 1 (Full TL) each.

The Parent Bank's paid-in capital is TL 3,486,268 as of 31 December 2019 and ING Bank N.V. has full control over the Parent Bank's capital.

Other shareholders total represent the total shares of Chairman of the Board John T. Mc Carthy, Vice Chairman of the Board Adrianus J. A. Kas, the members of the Board A. Canan Ediboğlu and Sali Salieski with a nominal value of TL 1 (Full TL) each.

Mehmet Sırrı Erkan's share with a nominal value of TL 1 (full TL) was transferred to Marco Bragadin on 20 February 2019.

Vice chairman of the Board Mehmet Sırrı Erkan, whose term of duty has expired, has resigned from his duty as of 21 March 2019.

Marco Bragadin's share with a nominal value of TL 1 (full TL) was transferred to Sali Salieski on 20 August 2019.

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

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

As of 31 December 2019, the Parent 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
M. Semra Kuran	BoD Member and Chairman of the Audit Committee	Legally declared
Adrianus J. A. Kas	Vice Chairman of the BoD and Audit Committee Member	Legally declared
Pınar Abay	BoD Member and Chief Executive Officer	Legally declared
Sali Salieski	BoD Member	Legally declared
Alper Hakan Yüksel	Executive Vice President	Corporate Banking
Alper İhsan Gökgöz	Executive Vice President	Retail Banking
Ayşegül Akay	Executive Vice President	Financial Institutions and Debt Capital Markets
Bohdan Robert Stepkowski	Executive Vice President	Financial Markets
Gordana Hulina	Executive Vice President	Credits
Günce Çakır	Legal Executive Vice President	Legal
Ebru Sönmez Yanık	Executive Vice President	Corporate Customers Sales
İ. Bahadır Şamlı	Executive Vice President	Technology
İhsan Çakır	Executive Vice President	SME and Mid Corporate Banking
İlker Kayseri	Executive Vice President	Treasury
K. Atıl Özus	Chief Financial Officer	Financial Control and Treasury
Meltem Öztürk	Executive Vice President	Human Resources
Murat Tursun	Chief Audit Executive	Internal Audit
Nermin Güney	Executive Vice President	Financial Risk Management
N. Yücel Ölçer	Executive Vice President	Operation
Öcal Ağar	Executive Vice President	Business Lending and Risk Analytics

Öcal Ağar has been appointed as Business Lending and Risk Analytics Executive Vice President per the Board of Directors resolution No. 47 and dated 21 November 2018 after completion of the BRSA process, he started his duty as of 1 January 2019.

The Parent Bank's Ordinary General Assembly meeting was held on 21 March 2019. With the division of duties resolution, no. 18/1, dated 21 March 2019, M. Semra Kuran was elected as Chairman and Adrianus Johannes Antonius Kas was elected as member of the Audit Committee.

Human Resources Executive Vice President Bahar Özen, has resigned from her duty as of 31 May 2019. Meltem Öztürk has been appointed as Human Resources Executive Vice President per the Board of Directors resolution No. 64/1 and dated 25 October 2019.

Sali Salieski has been appointed as Board of Member per the Board of Directors resolution No. 48/1 and dated 7 August 2019, after completion of the BRSA process, he started his duty as of 17 September 2019.

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

IV. Information on the Parent Bank's qualified shareholders

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

V. Summary information on the Parent Bank's activities and services

The Parent 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 Parent Bank carries out its operations with 210 domestic branches.

The Parent Bank and its subsidiaries ING European Financial Services Plc., ING Finansal Kiralama A.Ş., ING Faktoring A.Ş. and ING Menkul Değerler A.Ş. has been included in the scope of consolidation. The Parent Bank together with its consolidated subsidiaries are referred to as the "Group" in these consolidated financial statements and notes to consolidated financial statements.

VI. Information on application differences between consolidation practices as per the Regulation on Preparation of Consolidated Financial Statements of Banks as per the Turkish Accounting Standards, and entities subject to full or proportional consolidation or deducted from equity or not subject to any of these three methods

Subsidiaries of the Parent Bank are subject to consolidation within the scope of full consolidation, there is no difference consolidation process according to the Turkish Accounting Standards and the Communiqué of the Preparation of Consolidated Financial Statements of Banks in Turkey.

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

None.

Section two

Consolidated financial statements

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ING Bank A.Ş. and its Financial Subsidiaries

Consolidated balance sheet (statement of financial position) as of 31 December 2019

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

					Audited			Audited
					Current period			Prior period
	Assets	**Note**			**(31/12/2019)**			**(31/12/2018)**
		(section five)	**TL**	**FC**	**Total**	**TL**	**FC**	**Total**
I.	**Financial assets (net)**		**12,787,477**	**8,199,141**	**20,986,618**	**8,999,453**	**9,624,383**	**18,623,836**
1.1	**Cash and cash equivalents**		**8,911,743**	**7,919,624**	**16,831,367**	**5,132,989**	**9,278,715**	**14,411,704**
1.1.1	Cash and balances at Central Bank	(I-1)	650,207	6,777,349	7,427,556	698,875	8,211,362	8,910,237
1.1.2	Banks	(I-3)	13,802	1,142,275	1,156,077	81,826	1,067,353	1,149,179
1.1.3	Money market placements		8,256,577	-	8,256,577	4,360,089	-	4,360,089
1.1.4	Expected credit losses (-)	(I-5)	(8,843)	-	(8,843)	(7,801)	-	(7,801)
1.2	**Financial assets at fair value through profit or loss**	**(I-2)**	**32,731**	**89,993**	**122,724**	**1,962**	**26,814**	**28,776**
1.2.1	Government securities		32,696	89,993	122,689	1,914	26,814	28,728
1.2.2	Equity instruments		35	-	35	35	-	35
1.2.3	Other financial assets		-	-	-	13	-	13
1.3	**Financial assets at fair value through other comprehensive income**	**(I-4)**	**1,340,361**	**229**	**1,340,590**	**647,875**	**208**	**648,083**
1.3.1	Government securities		1,329,200	-	1,329,200	639,797	-	639,797
1.3.2	Equity instruments		11,161	229	11,390	8,078	208	8,286
1.3.3	Other financial assets		-	-	-	-	-	-
1.4	**Derivative financial assets**		**2,502,642**	**189,295**	**2,691,937**	**3,216,627**	**318,646**	**3,535,273**
1.4.1	Derivative financial assets measured at fair value through profit or loss	(I-2)	2,467,326	188,178	2,655,504	247,716	318,646	566,362
1.4.2	Derivative financial assets measured at fair value through other comprehensive income	(I-11)	35,316	1,117	36,433	2,968,911	-	2,968,911
II.	**Financial assets measured at amortised cost**		**24,094,454**	**18,836,493**	**42,930,947**	**30,376,699**	**18,050,360**	**48,427,059**
2.1	**Loans**	**(I-5)**	**23,645,713**	**17,911,812**	**41,557,525**	**30,182,121**	**16,794,475**	**46,976,596**
2.2	**Receivables from leasing transactions**	**(I-10)**	**39,828**	**813,238**	**853,066**	**46,502**	**1,068,105**	**1,114,607**
2.3	**Factoring receivables**		**277,074**	**111,443**	**388,517**	**567,736**	**187,780**	**755,516**
2.4	**Other financial assets measured at amortised cost**	**(I-6)**	**2,114,571**	**-**	**2,114,571**	**1,194,996**	**-**	**1,194,996**
2.4.1	Government securities		2,114,571	-	2,114,571	1,194,996	-	1,194,996
2.4.2	Other financial assets		-	-	-	-	-	-
2.5	**Expected credit losses (-)**	**(I-5)**	**(1,982,732)**	**-**	**(1,982,732)**	**(1,614,656)**	**-**	**(1,614,656)**
III.	**Assets held for sale and assets of discontinued operations (net)**	**(I-16)**	**660**	**-**	**660**	**660**	**-**	**660**
3.1	Assets held for sale		660	-	660	660	-	660
3.2	Assets from discontinued operations		-	-	-	-	-	-
IV.	**Equity investments**		**-**	**-**	**-**	**-**	**-**	**-**
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)**	**-**	**-**	**-**	-	-	-
4.2.1	Unconsolidated financial subsidiaries		-	-	-	-	-	-
4.2.2	Unconsolidated non-financial subsidiaries		-	-	-	-	-	-
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)**	**946,973**	**5**	**946,978**	**684,290**	**7**	**684,297**
VI.	**Intangible assets (net)**	**(I-13)**	**55,171**	**-**	**55,171**	**40,788**	**-**	**40,788**
6.1	Goodwill		-	-	-	-	-	-
6.2	Other		55,171	-	55,171	40,788	-	40,788
VII.	**Investment property (net)**	**(I-14)**	**-**	**-**	**-**	**-**	**-**	**-**
VIII.	**Current tax asset**	**(I-15)**	**-**	**-**	**-**	**-**	**-**	**-**
IX.	**Deferred tax asset**		**47**	**-**	**47**	**11,293**	**-**	**11,293**
X.	**Other assets (net)**	**(I-17)**	**499,399**	**13,994**	**513,393**	**602,285**	**21,864**	**624,149**
	Total assets		**38,384,181**	**27,049,633**	**65,433,814**	**40,715,468**	**27,696,614**	**68,412,082**

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

Consolidated balance sheet (statement of financial position) as of 31 December 2019

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

	Liabilities	Note (section five)	Audited Current period (31/12/2019) TL	FC	Total	Audited Prior period (31/12/2018) TL	FC	Total
I.	**Deposits**	**(II-1)**	**23,355,995**	**15,613,731**	**38,969,726**	**19,969,274**	**12,308,163**	**32,277,437**
II.	**Loans received**	**(II-3)**	**313,517**	**10,544,127**	**10,857,644**	**467,942**	**20,899,432**	**21,367,374**
III.	**Money market funds**		**14,228**	**82,601**	**96,829**	**2,166**	**20,450**	**22,616**
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**		**819,686**	**162,690**	**982,376**	**911,803**	**199,959**	**1,111,762**
7.1	Derivative financial liabilities at fair value through profit or loss	(II-2)	470,966	156,032	626,998	652,925	195,431	848,356
7.2	Derivative financial liabilities at fair value through other comprehensive income	(II-7)	348,720	6,658	355,378	258,878	4,528	263,406
VIII.	**Factoring payables**		**23**	**2,290**	**2,313**	**26**	**620**	**646**
IX.	**Lease payables (net)**	**(II-6)**	**298,779**	**-**	**298,779**	**-**	**-**	**-**
X.	**Provisions**	**(II-8)**	**225,321**	**319**	**225,640**	**271,080**	**-**	**271,080**
10.1	Provision for restructuring		-	-	-	-	-	-
10.2	Reserves for employee benefits		57,205	-	57,205	53,664	-	53,664
10.3	Insurance technical reserves (net)		-	-	-	-	-	-
10.4	Other provisions		168,116	319	168,435	217,416	-	217,416
XI.	**Current tax liability**	**(II-9)**	**132,517**	**1,276**	**133,793**	**250,939**	**797**	**251,736**
XII.	**Deferred tax liability**	**(II-9)**	**191,341**	**-**	**191,341**	**430,595**	**-**	**430,595**
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)**	**-**	**4,237,398**	**4,237,398**	**-**	**3,813,522**	**3,813,522**
14.1	Loans		-	4,237,398	4,237,398	-	3,813,522	3,813,522
14.2	Other debt instruments		-	-	-	-	-	-
XV.	**Other liabilities**	**(II-5)**	**751,226**	**148,208**	**899,434**	**1,058,514**	**149,188**	**1,207,702**
XVI.	**Shareholders' equity**	**(II-12)**	**8,544,988**	**(6,447)**	**8,538,541**	**7,662,094**	**(4,482)**	**7,657,612**
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		139,347	-	139,347	139,276	-	139,276
16.4	Other comprehensive income/expense items to be recycled in Profit or Loss		(71,334)	(6,447)	(77,781)	598,124	(4,482)	593,642
16.5	Profit reserves		3,448,841	-	3,448,841	2,297,792	-	2,297,792
16.5.1	Legal reserves		256,871	-	256,871	201,819	-	201,819
16.5.2	Statutory reserves		-	-	-	-	-	-
16.5.3	Extraordinary reserves		3,191,970	-	3,191,970	2,095,973	-	2,095,973
16.5.4	Other profit reserves		-	-	-	-	-	-
16.6	Profit or (loss)		1,541,866	-	1,541,866	1,140,634	-	1,140,634
16.6.1	Prior years' profits or (loss)		-	-	-	-	-	-
16.6.2	Current period profit or (loss)		1,541,866	-	1,541,866	1,140,634	-	1,140,634
16.7	Minority interest		-	-	-	-	-	-
	Total liabilities and shareholders' equity		**34,647,621**	**30,786,193**	**65,433,814**	**31,024,433**	**37,387,649**	**68,412,082**

(Convenience translation of the independent auditors' report and consolidated financial statements originally issued in Turkish, See Note 1.b of section three)

ING Bank A.Ş. and its Financial Subsidiaries

Consolidated statement of off-balance sheet items as of 31 December 2019

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

					Audited			Audited
					Current period			Prior period
	Off-balance sheet items	**Note**			**(31/12/2019)**			**(31/12/2018)**
		(section five)	**TL**	**FC**	**Total**	**TL**	**FC**	**Total**
A.	**Off-balance sheet commitments (I+II+III)**		**34,478,415**	**75,741,500**	**110,219,915**	**46,655,305**	**63,802,736**	**110,458,041**
I.	**Guarantees and warranties**	**(III-1)**	**1,669,594**	**6,670,880**	**8,340,474**	**2,163,251**	**6,724,218**	**8,887,469**
1.1	Letters of guarantee		1,649,564	5,076,444	6,726,008	2,135,210	4,474,703	6,609,913
1.1.1	Guarantees subject to state tender law		4,075	-	4,075	14,570	-	14,570
1.1.2	Guarantees given for foreign trade operations		-	-	-	-	-	-
1.1.3	Other letters of guarantee		1,645,489	5,076,444	6,721,933	2,120,640	4,474,703	6,595,343
1.2	Bank acceptances		-	4,008	4,008	-	39,370	39,370
1.2.1	Import letter of acceptance		-	4,008	4,008	-	39,370	39,370
1.2.2	Other bank acceptances		-	-	-	-	-	-
1.3	Letters of credit		445	1,125,301	1,125,746	396	1,763,942	1,764,338
1.3.1	Documentary letters of credit		445	1,125,301	1,125,746	396	1,763,942	1,764,338
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		15,956	72,095	88,051	25,318	99,940	125,258
1.8	Other guarantees		-	197,295	197,295	-	247,879	247,879
1.9	Other warranties		3,629	195,737	199,366	2,327	98,384	100,711
II.	**Commitments**	**(III-1)**	**3,705,313**	**4,635,183**	**8,340,496**	**4,144,632**	**913,196**	**5,057,828**
2.1	Irrevocable commitments		3,705,313	4,635,183	8,340,496	4,144,632	913,196	5,057,828
2.1.1	Forward asset purchase commitments		405,769	3,986,470	4,392,239	403,269	895,834	1,299,103
2.1.2	Forward deposit purchase and sales commitments		-	-	-	-	-	-
2.1.3	Share capital commitments to associates and subsidiaries		-	-	-	-	-	-
2.1.4	Loan granting commitments		1,695,522	646,582	2,342,104	1,807,625	15,526	1,823,151
2.1.5	Securities underwriting commitments		-	-	-	-	-	-
2.1.6	Commitments for reserve requirements		-	-	-	-	-	-
2.1.7	Commitments for cheque payments		271,795	-	271,795	352,249	-	352,249
2.1.8	Tax and fund liabilities from export commitments		23,780	-	23,780	20,545	-	20,545
2.1.9	Commitments for credit card limits		1,300,950	-	1,300,950	1,553,684	-	1,553,684
2.1.10	Commitments for credit cards and banking services promotions		5,732	-	5,732	5,479	-	5,479
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		1,765	2,131	3,896	1,781	1,836	3,617
2.2	Revocable commitments		-	-	-	-	-	-
2.2.1	Revocable loan granting commitments		-	-	-	-	-	-
2.2.2	Other revocable commitments		-	-	-	-	-	-
III.	**Derivative financial instruments**	**(III-2)**	**29,103,508**	**64,435,437**	**93,538,945**	**40,347,422**	**56,165,322**	**96,512,744**
3.1	Derivative financial instruments for hedging purposes		5,080,000	2,205,819	7,285,819	21,984,936	4,734,539	26,719,475
3.1.1	Fair value hedges		-	-	-	-	-	-
3.1.2	Cash flow hedges		5,080,000	2,205,819	7,285,819	21,984,936	4,734,539	26,719,475
3.1.3	Net foreign investment hedges		-	-	-	-	-	-
3.2	Derivative financial instruments for trading purposes		24,023,508	62,229,618	86,253,126	18,362,486	51,430,783	69,793,269
3.2.1	Forward foreign currency buy/sell transactions		1,887,129	6,750,727	8,637,856	3,095,729	11,074,747	14,170,476
3.2.1.1	Forward foreign currency transactions-buy		1,152,631	3,165,311	4,317,942	2,553,730	4,648,919	7,202,649
3.2.1.2	Forward foreign currency transactions-sell		734,498	3,585,416	4,319,914	541,999	6,425,828	6,967,827
3.2.2	Swap transactions related to foreign currency and interest rates		21,428,055	51,953,125	73,381,180	15,051,633	38,647,276	53,698,909
3.2.2.1	Foreign currency swap-buy		1,995,789	20,142,032	22,137,821	3,332,426	18,037,056	21,369,482
3.2.2.2	Foreign currency swap-sell		4,018,266	16,292,637	20,310,903	10,579,207	11,431,226	22,010,433
3.2.2.3	Interest rate swap-buy		7,707,000	7,759,228	15,466,228	570,000	4,589,497	5,159,497
3.2.2.4	Interest rate swap-sell		7,707,000	7,759,228	15,466,228	570,000	4,589,497	5,159,497
3.2.3	Foreign currency, interest rate and securities options		708,324	3,525,766	4,234,090	181,758	1,708,760	1,890,518
3.2.3.1	Foreign currency options-buy		354,162	1,762,883	2,117,045	90,879	854,380	945,259
3.2.3.2	Foreign currency options-sell		354,162	1,762,883	2,117,045	90,879	854,380	945,259
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		-	-	-	33,366	-	33,366
B.	**Custody and pledged items (IV+V+VI)**		**191,850,928**	**32,720,240**	**224,571,168**	**236,801,620**	**46,253,124**	**283,054,744**
IV.	**Items held in custody**		**1,617,573**	**2,108,482**	**3,726,055**	**980,400**	**1,952,616**	**2,933,016**
4.1	Customer fund and portfolio balances		1,314,449	-	1,314,449	401,049	-	401,049
4.2	Investment securities held in custody		57,473	320,291	377,764	89,196	291,567	380,763
4.3	Checks received for collection		95,899	433,100	528,999	308,278	412,217	720,495
4.4	Commercial notes received for collection		137,270	1,288,791	1,426,061	169,395	1,143,098	1,312,493
4.5	Other assets received for collection		-	-	-	-	-	-
4.6	Assets received for public offering		-	-	-	-	-	-
4.7	Other items under custody		12,482	66,300	78,782	12,482	105,734	118,216
4.8	Custodians		-	-	-	-	-	-
V.	**Pledged received**		**25,845,046**	**7,230,622**	**33,075,668**	**36,573,782**	**9,371,568**	**45,945,350**
5.1	Marketable securities		133,731	57,440	191,171	223,731	7,819	231,550
5.2	Guarantee notes		215,042	245,927	460,969	7,252,373	1,944,017	9,196,390
5.3	Commodity		910	-	910	910	-	910
5.4	Warranty		-	-	-	-	-	-
5.5	Properties		22,542,362	6,200,939	28,743,301	25,499,601	6,140,983	31,640,584
5.6	Other pledged items		2,953,001	726,316	3,679,317	3,597,167	1,278,749	4,875,916
5.7	Pledged items-depository		-	-	-	-	-	-
VI.	**Accepted independent guarantees and warranties**		**164,388,309**	**23,381,136**	**187,769,445**	**199,247,438**	**34,928,940**	**234,176,378**
	Total off-balance sheet items (A+B)		**226,329,343**	**108,461,740**	**334,791,083**	**283,456,925**	**110,055,860**	**393,512,785**

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

ING Bank A.Ş. and its Financial Subsidiaries

Consolidated statement of profit or loss
for the year ended 31 December 2019
(Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

	Income and expense items	Note (section five)	Audited Current period (01/01/2019-31/12/2019)	Audited Prior period (01/01/2018-31/12/2018)
I.	**Interest income**	**(IV-1)**	**7,424,141**	**7,273,105**
1.1	Interest on loans		5,577,024	6,368,425
1.2	Interest on reserve requirements		64,659	76,719
1.3	Interest on banks		98,851	92,767
1.4	Interest on money market transactions		1,104,530	281,594
1.5	Interest on marketable securities portfolio		444,089	269,826
1.5.1	Financial assets at fair value through profit or loss		20,463	33,150
1.5.2	Financial assets at fair value through other comprehensive income		152,865	73,946
1.5.3	Financial assets measured at amortised cost		270,761	162,730
1.6	Finance lease income		43,740	55,460
1.7	Other interest income		91,248	128,314
II.	**Interest expense (-)**	**(IV-2)**	**(3,961,663)**	**(3,612,001)**
2.1	Interest on deposits		(3,419,570)	(2,911,610)
2.2	Interest on funds borrowed		(481,981)	(656,348)
2.3	Interest on money market transactions		(9,340)	(15,070)
2.4	Interest on securities issued		-	(20,632)
2.5	Finance lease expense		(48,526)	-
2.6	Other interest expenses		(2,246)	(8,341)
III.	**Net interest income/expense (I - II)**		**3,462,478**	**3,661,104**
IV.	**Net fees and commissions income/expense**		**487,583**	**485,589**
4.1	Fees and commissions received		684,035	715,522
4.1.1	Non-cash loans		133,740	147,108
4.1.2	Other	(IV-12)	550,295	568,414
4.2	Fees and commissions paid (-)		(196,452)	(229,933)
4.2.1	Non-cash loans		(699)	(378)
4.2.2	Other	(IV-12)	(195,753)	(229,555)
V	**Dividend income**	**(IV-3)**	**3,115**	**167**
VI.	**Trading gain/(loss) (net)**	**(IV-4)**	**605,830**	**(177,627)**
7.1	Trading gain/(loss) on securities		(2,680)	(40,888)
7.2	Gain/(loss) on derivative financial transactions		928,396	3,199,952
7.3	Foreign exchange gain/(loss)		(319,886)	(3,336,691)
VII.	**Other operating income**	**(IV-5)**	**604,888**	**652,156**
VIII.	**Gross operating income (III+IV+V+VI+VII)**		**5,163,894**	**4,621,389**
IX.	**Expected credit loss (-)**	**(IV-6)**	**(1,217,243)**	**(1,286,554)**
X.	**Other provision expenses (-)**		**(9,334)**	**(98,409)**
XI.	**Personnel expenses (-)**		**(742,014)**	**(650,828)**
XII	**Other operating expenses**	**(IV-7)**	**(1,219,373)**	**(1,131,292)**
XIII.	**Net operating profit/(loss) (IX-X-XI)**		**1,975,930**	**1,454,306**
XIV.	**Income resulted from mergers**		**-**	**-**
XV.	**Income/loss from investments under equity accounting**		**-**	**-**
XVI.	**Gain/loss on net monetary position**		**-**	**-**
XVII.	**Operating profit/loss before taxes (XII+...+XV)**	**(IV-8)**	**1,975,930**	**1,454,306**
XVIII.	**Provision for taxes of continued operations (±)**	**(IV-9)**	**(434,064)**	**(313,672)**
18.1	Current tax provision		(482,086)	(240,335)
18.2	Expense effect of deferred tax (+)		(261,649)	(308,433)
18.3	Income effect of deferred tax (-)		309,671	235,096
XIX.	**Net profit/(loss) from continuing operations (XVI±XVII)**	**(IV-10)**	**1,541,866**	**1,140,634**
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 (XIX-XX)**		-	-
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 (XXI±XXII)**		-	-
XXV.	**Net profit/(loss) (XVIII+XXIII)**	**(IV-11)**	**1,541,866**	**1,140,634**
25.1	Profit/(Loss) from the Group		1,541,866	1,140,634
25.2	Income/(Loss) from Minority Interest (-)		-	-
	Earnings per share		0.4423	0.3272

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

ING Bank A.Ş. and its Financial Subsidiaries

Consolidated statement profit or loss and other comprehensive income for the year ended 31 December 2019

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

	Profit or loss and other comprehensive income	Audited Current period (01/01/2019-31/12/2019)	Audited Prior period (01/01/2018-31/12/2018)
I.	**Current period profit/loss**	**1,541,866**	**1,140,634**
II.	**Other comprehensive income**	**(660,937)**	**351,337**
2.1	**Other income/expense items not to be recycled to profit or loss**	**(906)**	**(1,550)**
2.1.1	Gains/(losses) on revaluation of property, plant and equipment	-	-
2.1.2	Gains/(losses) on revaluation of intangible assets	-	-
2.1.3	Defined benefit plans' actuarial gains/(losses)	(1,138)	(1,974)
2.1.4	Other income/(expense) items not to be recycled to profit or loss	-	15
2.1.5	Deferred taxes on other comprehensive income not to be recycled to profit or loss	232	409
2.2	**Other income/expense items to be recycled to profit or loss**	**(660,031)**	**352,887**
2.2.1	Translation differences	7,858	8,794
2.2.2	Income/(Expenses) from valuation and/or reclassification of financial assets measured at FVOCI	119,091	(10,642)
2.2.3	Gains/(losses) from cash flow hedges	(966,734)	447,901
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	179,754	(93,166)
III.	**Total comprehensive income (I+II)**	**880,929**	**1,491,971**

Consolidated statement of changes in equity
for the year ended 31 December 2019
(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								
	Audited	**Note**	**Paid-in capital**	**Share premium**	**Share cancellation profits**	**Other capital reserves**	**Revaluation surplus on tangible and intangible assets**	**Defined benefit plans' actuarial gains/losses**	**Other (1)**	**Translation differences**	**Income/expenses from valuation and/or reclassification of financial assets measured at FVOCI**	**Other (2)**	**Profit reserves**	**Prior period profit or (loss)**	**Current period profit or (loss)**	**Total equity except from minority interest**	**Minority interest**	**Total shareholders' equity**
	Prior period (01/01/2018-31/12/2018)																	
I.	**Balances at beginning of period**		**3,486,268**	**-**	**-**	**-**	**46,732**	**161**	**143**	**26,338**	**(16,548)**	**250,288**	**1,232,863**	**-**	**888,155**	**5,914,400**	**-**	**5,914,400**
II.	**Correction made as per TAS 8**		**-**	**-**	**-**	**-**	**-**	**-**	**(399)**	**-**	**11,951**	**-**	**408,439**	**-**	**-**	**419,991**	**-**	**419,991**
2.1	Effect of corrections		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2.2	Effect of changes in accounting policies		-	-	-	-	-	-	(399)	-	11,951	-	408,439	-	-	419,991	-	419,991
III.	**New balance (I+II)**		**3,486,268**	**-**	**-**	**-**	**46,732**	**161**	**(256)**	**26,338**	**(4,597)**	**250,288**	**1,641,302**	**-**	**888,155**	**6,334,391**	**-**	**6,334,391**
IV.	Total comprehensive income		-	-	-	-	-	(1,565)	15	8,794	(8,583)	352,676	-	-	1,140,634	1,491,971	-	1,491,971
V.	Capital increase by cash		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
VI.	Capital increase by internal sources		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
VII.	Paid-in capital inflation adjustment difference		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
VIII.	Convertible bonds to shares		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
IX.	Subordinated debt instruments		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
X.	Increase/decrease by other changes		-	-	-	-	-	-	-	(31,274)	-	-	31,274	-	-	-	-	-
XI.	Profit distribution		-	-	-	-	94,189	-	-	-	-	-	625,216	-	(888,155)	(168,750)	-	(168,750)
11.1	Dividends paid		-	-	-	-	-	-	-	-	-	-	(168,750)	-	-	(168,750)	-	(168,750)
11.2	Transfers to reserves		-	-	-	-	94,189	-	-	-	-	-	793,966	-	(888,155)	-	-	-
11.3	Other		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Period-end balance (III+IV+…...+X+XI)		**3,486,268**	**-**	**-**	**-**	**140,921**	**(1,404)**	**(241)**	**3,858**	**(13,180)**	**602,964**	**2,297,792**	**-**	**1,140,634**	**7,657,612**	**-**	**7,657,612**
	Current period (01/01/2019-31/12/2019)																	
I.	**Balances at beginning of period**		**3,486,268**	**-**	**-**	**-**	**140,921**	**(1,404)**	**(241)**	**3,858**	**(13,180)**	**602,964**	**2,297,792**	**-**	**1,140,634**	**7,657,612**	**-**	**7,657,612**
II.	**Correction made as per TAS 8**		**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
2.1	Effect of corrections		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2.2	Effect of changes in accounting policies		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
III.	**New balance (I+II)**		**3,486,268**	**-**	**-**	**-**	**140,921**	**(1,404)**	**(241)**	**3,858**	**(13,180)**	**602,964**	**2,297,792**	**-**	**1,140,634**	**7,657,612**	**-**	**7,657,612**
IV.	Total comprehensive income		-	-	-	-	-	(906)	-	(3,534)	94,698	(762,587)	-	-	1,541,866	869,537	-	869,537
V.	Capital increase by cash		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
VI.	Capital increase by internal sources		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
VII.	Paid-in capital inflation adjustment difference		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
VIII.	Convertible bonds to shares		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
IX.	Subordinated debt instruments		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
X.	Increase/decrease by other changes		-	-	-	-	-	-	-	-	-	-	11,392	-	-	11,392	-	11,392
XI.	Profit distribution		-	-	-	-	977	-	-	-	-	-	1,139,657	-	(1,140,634)	-	-	-
11.1	Dividends paid		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11.2	Transfers to reserves	(II-12)	-	-	-	-	977	-	-	-	-	-	1,139,657	-	(1,140,634)	-	-	-
11.3	Other		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Period-end balance (III+IV+…...+X+XI)		**3,486,268**	**-**	**-**	**-**	**141,898**	**(2,310)**	**(241)**	**324**	**81,518**	**(159,623)**	**3,448,841**	**-**	**1,541,866**	**8,538,541**	**-**	**8,538,541**

(1) Other (Shares of investments valued by equity method in other comprehensive income not to be recycled to profit or loss and other accumulated amounts of other comprehensive income items not to be recycled to other profit or loss)

(2) Other (Cash flow hedge gain/loss, shares of investments valued by equity method in other comprehensive income recycled to profit or loss and other accumulated amounts of other comprehensive income items recycled to other profit or loss)

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

Consolidated statement of cash flows
for the year ended 31 December 2019
(Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

	Statement of cash flows	Note	Audited Current period (01/01/2019-31/12/2019)	Audited Prior period (01/01/2018-31/12/2018)
A.	**Cash flows from banking operations**			
1.1	**Operating profit/(loss) before changes in operating assets and liabilities**		**1,391,191**	**3,156,742**
1.1.1	Interest received		7,544,919	7,048,271
1.1.2	Interest paid		(4,039,980)	(3,577,512)
1.1.3	Dividend received		3,115	167
1.1.4	Fees and commissions received		659,877	708,306
1.1.5	Other income	(VI-2)	126,267	81,958
1.1.6	Collections from previously written-off loans and other receivables		793,590	621,575
1.1.7	Payments to personnel and service suppliers		(1,490,754)	(1,446,325)
1.1.8	Taxes paid		(600,029)	(135,760)
1.1.9	Other	(VI-2)	(1,605,814)	(143,938)
1.2	**Changes in operating assets and liabilities**		**1,202,535**	**2,452,411**
1.2.1	Net increase/decrease in financial assets at fair value through profit or loss		(93,803)	13,404
1.2.2	Net (increase) decrease in due from bank		(160,384)	(152,173)
1.2.3	Net (increase) decrease in loans		6,002,134	(1,250,906)
1.2.4	Net (increase) decrease in other assets	(VI-2)	3,046,096	227,686
1.2.5	Net increase (decrease) in bank deposits		(447,237)	(37,866)
1.2.6	Net increase (decrease) in other deposits		5,509,844	773,470
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		(11,481,044)	1,265,817
1.2.9	Net increase / (decrease) in matured payables		-	-
1.2.10	Net increase / (decrease) in other liabilities	(VI-2)	(1,173,071)	1,612,979
I.	**Net cash provided from banking operations**		**2,593,726**	**5,609,153**
B.	**Cash flow from investing activities**			
II.	**Net cash provided from investing activities**		**(1,467,022)**	**(317,713)**
2.1	Cash paid for acquisition of subsidiaries, investments in associates and joint ventures		-	-
2.2	Cash obtained from disposal of subsidiaries, investments in associates and joint ventures		13,223	-
2.3	Purchases of property and equipment		(356,161)	(333,101)
2.4	Disposals of property and equipment		333,853	135,125
2.5	Cash paid for purchase of financial assets at fair value through other comprehensive income		(553,547)	(241,296)
2.6	Cash obtained from sale of financial assets at fair value through other comprehensive income		15,836	3,049
2.7	Cash paid for purchase of financial assets measured at amortised cost		(912,878)	-
2.8	Cash obtained from sale of financial assets measured at amortised cost		36,299	142,041
2.9	Other	(VI-2)	(43,647)	(23,531)
C.	**Cash flows from financing activities**			
III.	**Net cash provided from financing activities**		**(106,097)**	**(168,750)**
3.1	Cash obtained from funds borrowed and securities issued	(II-4)	-	265,000
3.2	Cash used for repayment of funds borrowed and securities issued	(II-4)	-	(265,000)
3.3	Issued equity instruments		-	-
3.4	Dividends paid	(II-12)	-	(168,750)
3.5	Payments for finance leases		(106,097)	-
3.6	Other		-	-
IV.	**Effect of change in foreign exchange rate on cash and cash equivalents**	**(VI-2)**	**964,621**	**1,175,197**
V.	**Net increase in cash and cash equivalents (I+II+III+IV)**		**1,985,228**	**6,297,887**
VI.	**Cash and cash equivalents at beginning of the period**	**(VI-1)**	**11,420,391**	**5,122,504**
VII.	**Cash and cash equivalents at the end of the period**	**(VI-1)**	**13,405,619**	**11,420,391**

Statement of profit distribution
for the year ended 31 December 2019
(Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

	Profit distribution table	Audited Current period (31/12/2019) (*)	Audited Prior period (31/12/2018)
I.	**Distribution of current year profit**		
1.1	Current year profit	1,876,068	1,344,827
1.2	Taxes and duties payable (-)	399,757	283,067
1.2.1	Corporate tax (Income tax)	459,489	214,013
1.2.2	Income withholding tax	-	-
1.2.3	Other taxes and duties	(59,732)	69,054
A.	**Net profit for the year (1.1-1.2)**	**1,476,311**	**1,061,760**
1.3	Prior year losses (-)	-	-
1.4	First legal reserves (-)	-	53,088
1.5	Other statutory reserves (-)	-	-
B.	**Net profit available for distribution (A-(1.3+1.4+1.5))**	**1,476,311**	**1,008,672**
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 (**)	-	1,007,695
1.12	Other reserves	-	-
1.13	Special funds (***)	-	977
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	0.42	0.30
3.2	To owners of ordinary shares (%)	42.35%	30.46%
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, 2019 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 21 March 2019, amounting to TL 174,313 of distributable profit for the year 2018, has been classified as first dividend share and related amount has been kept as extraordinary reserves with TL 833,382.

(***) According to Ordinary General Meeting dated 21 March 2019, amounting to TL 977 of distributable profit for the year 2018 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).

Section three

Accounting policies

I. Explanations on basis of presentation

a. The preparation of the consolidated 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 consolidated 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 Accounting Standards 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.

The consolidated 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 consolidated financial statements in conformity with BRSA Accounting and Financial Reporting Legislation requires the use of certain critical accounting estimates and assumptions by the Parent 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 presentation of consolidated financial statements

The accounting policies and valuation principles applied in the preparation of consolidated financial statements are determined and applied in accordance with BRSA Accounting and Financial Reporting Legislation. These accounting policies and valuation principles are explained in Notes II to XXV below.

The accounting policies adopted in the preparation of the consolidated financial statements are consistent with the standards used in the previous year, except for as explained in Note I-d.

c. Changes in accounting policies and disclosures

The Group has started to apply TFRS 16 Leases standard in the accompanying consolidated financial statements starting from 1 January 2019 for the first time based on the regulation published in the Official Gazette no. 29826 dated 16 April 2018, which came into force starting from 1 January 2019. The effects of TFRS 16 on the financial statements of the Group are presented in section three, footnote XXV.

Standards effective as of 1 January 2019

TFRS 16 Leases

TFRS 16 Leases standard ("TFRS 16"), effective starting from 1 January 2019, removes the distinction between operating and finance leases applied by the lessee in TAS 17 Leases ("TAS 17"). Instead, it is set forth a single accounting model similar to the accounting of finance leases on balance sheet. For lessors, the accounting stays almost the same.

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

The Group 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 Group's asset and shareholder's equity structure is sufficient to meet its liabilities.

Due to the risks management policy, the Group does not take significant currency positions. In case of a currency risk due from the customer transactions, the Group 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 Group 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 Parent 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.

Foreign currency denominated accounts of the subsidiaries within the Group have been valued with the foreign exchange buying rates applicable on the reporting date.

Regarding the financial statements of the foreign subsidiary of the Group, balance sheet items are converted to Turkish Lira at the period-end balance sheet exchange rates, and statement of profit or loss items are converted at average exchange rate, and all resulting exchange differences are accounted in the shareholders' equity under "Other comprehensive income/expense items to be recycled in Profit or Loss".

III. Explanations on consolidated subsidiaries

According to the full consolidation method, all of the subsidiaries' assets, liabilities, income, expense and off-balance sheet items are combined with the Parent Bank's assets, liabilities, income, expense and off-balance sheet items. The book value of the Parent Bank's investment in each subsidiary and the capital of each subsidiary are eliminated. Intercompany balances and profits and losses resulting from intercompany transactions are offset against each other. Parent Bank's guarantees given for the cash loans granted by consolidated subsidiaries are eliminated at consolidation and such exposures are included under cash loans in assets.

Where different accounting policies have been applied by the subsidiaries, these accounting policies have been aligned with the accounting policies of the Parent Bank.

ING European Financial Services Plc.

ING European Financial Services Plc. was established in 1994, in Ireland, to operate in corporate finance, issuance of certificates of deposits and treasury services.

The financial statements of the Company are prepared in EUR in accordance with the accounting principles effective in Ireland. The required adjustments and re-classifications have been made on the financial statements of the Company in order to comply with the financial statements of the Parent Bank.

III. Explanations on consolidated subsidiaries (continued)

ING Faktoring A.Ş. (ING Factoring)

ING Factoring was established in 2008 for the purpose of engaging in import, export and local factoring activities. The Company was granted operation license by the BRSA Board Decision, No. 3564, dated 3 March 2010.

The Company prepares its financial statements in accordance with the communique on the Application of Uniform Chart of Accounts and its Guide Book for Financial Leasing, Factoring and Financing Companies, TAS, TFRS and other regulations, communiqués, explanations and circulars promulgated by the BRSA in relation to accounting and financial reporting principles. The required adjustments and re-classifications have been made on the financial statements of the Company in order comply with the financial statements of the Parent Bank.

ING Finansal Kiralama A.Ş. (ING Leasing)

ING Leasing was established in 2008 for the purpose of operating in financial leasing activities and execute all kinds of transactions and contracts related to these activities. The company was granted operating license with the BRSA Board Decision, No. 3564, dated 3 March 2010.

The Company prepares its financial statements in accordance with the communique on the Application of Uniform Chart of Accounts and its Guide Book for Financial Leasing, Factoring and Financing Companies, TAS, TFRS and other regulations, communiqués, explanations and circulars promulgated by the BRSA in relation to accounting and financial reporting principles. The required adjustments and re-classifications have been made on the financial statements of the Company in order comply with the financial statements of the Parent Bank.

ING Menkul Değerler A.Ş. (ING Securities)

ING Securities was established in 1991 under the title Universal Menkul Değerler A.Ş. in 1991, and was acquired by ING UK Holdings Limited on 30 October 2008, and the title of the Company was changed as ING Menkul Değerler A.Ş. at the date of 27 May 2009. 100% shares of ING Securities were purchased by the Parent Bank on 15 August 2012.

Capital Markets Board approved the Company's application for continuing its operations and performing margin trading, short selling and lending and borrowing transactions of capital market instruments under its trading brokerage license as of 11 January 2013. On 26 July 2013, the Capital Markets Board approved the Company's application for a license to operate as an intermediary in trading derivatives for the purpose of operating in the futures and options market. With the Capital Market Board letter, dated 19 November 2013, the application of ING Securities for the establishment of an agency was approved as from 15 November 2013.

The financial statements of the Company are prepared in accordance with the Capital Markets Board legislation with respect to TAS enacted by POA. The required adjustments and re-classifications have been made on the financial statements of the Company in order to comply with the financial statements of the Parent Bank.

IV. Explanations on forward and options contracts and derivative instruments

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

Derivative financial instruments of the Group are classified as "Derivative Financial Assets Designated at Fair Value through Profit or Loss" or "Derivative Financial Assets Designated at Fair Value through Other Comprehensive Income" per TFRS 9.

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

Derivative transactions are valued at their fair values subsequent to their acquisition. 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" or "Derivative Financial Assets Designated at Fair Value Through Other Comprehensive Income", if the fair value is negative, the amount is classified as "Derivative Financial Liabilities Designated at Fair Value Through Profit or Loss" or "Derivative Financial Liabilities Designated at Fair Value Through Other Comprehensive Income". 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.

Explanations on derivative financial instruments held for hedging purpose

As permitted by TFRS 9, the Group continues to apply hedge accounting in accordance with TAS 39.

The Group enters into interest rate and cross currency swap transactions in order to hedge the changes in cash flows of the floating-rate financial instruments. While applying cash flow hedge accounting, the effective portion of the changes in the fair value of the hedging instrument is accounted for under "accumulated other comprehensive income or expense to be reclassified to profit or loss" in shareholders' equity, and the ineffective portion is recognised in income statement. The changes recognized in shareholders' equity is removed and included in income statement in the same period when the hedged cash flows effect the income 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 income 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 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 income statement considering the original maturity.

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 Group 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

Commissions paid for the loans provided and fees and commissions collected from clients in return for these loans are reflected on the statement of profit or loss in the period when they arise. On the other hand, of the fees and commissions collected from clients, the portions exceeding the amounts paid, and the fees and commissions collected without being associated with any cost are treated as an element of the effective interest of the loan, and they are recognized in the statement of profit or loss during the term of the loan on an accrual basis. Fees and commission expenses paid to the institutions and companies granting the loan are treated as an element of the effective interest, and they are associated with the statement of profit or loss during the term of the loan.

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 Group 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.

VII. Explanations on financial instruments (continued)

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 Group 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 Group 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 Group has tested the "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.

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 Group'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.

VII. Explanations on financial instruments (continued)

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.

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 "Other comprehensive income income/expense items to be recycled in profit or loss" under shareholders' equity.

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.

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.

VII. Explanations on financial instruments (continued)

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.

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.

Group's 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 by BRSA in the Official Gazette, no. 29750, dated 22 June 2016, the Group 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 loan 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. Group 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.

  Group 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, Group implements different probability of default thresholds to evaluate absolute and relative changes occurring in both retail and corporate portfolios. Related thresholds

VIII. Explanations on impairment of financial assets (continued)

are being analyzed by back-testing and revised accordingly if necessary. In this context the Group has changed the related thresholds as of 31 March 2019.

Qualitative criteria: Group 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 30 days,
- Loans classified to watch list status according to the decision of the Group'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,
- Other consumer loans of individual clients whose one of the consumer loan transferred to non-performing loan portfolio.

- **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 90 days
  - 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 90 days 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, FX rate fluctuations, real estate prices, and short-term interest rates). Group 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, corporate, retail mortgage and retail portfolios.

Expected credit loss measurement:

Group 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.

IX. Explanations on offsetting financial assets

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

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 sale, 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.

The properties obtained from the Group's receivables are shown at the fixed assets held for sale line according to the execution of the forward sales agreement.

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 Group 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	7% - 33%

The Group does not have goodwill.

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 is carried at cost less accumulated depreciation and provision for value decrease.

According to precautionary and materiality principles, when the current value of property and equipment is less than their net cost, the net cost which exceeds their current value is recognized in expense account as provision for impairment.

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 leasing transactions

a. Accounting of leasing operations as lessor

The Parent 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 Group performs operating lease for branches, ATM locations and vehicles. 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 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 impact and application of TFRS 16 transition were explained in section three, footnote XXV.

XV. Explanations on provisions, contingent assets and liabilities

Provisions and contingent liabilities are accounted in accordance with, "Turkish Accounting Standard for 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.

XVI. Explanations on obligations related to employee rights

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

In accordance with the existing social legislation in Turkey, the Parent 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 Parent 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 Parent Bank.

The Parent 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 Parent 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.

XVII. Explanations on taxation

a. Current tax

The Parent Bank and its subsidiaries operating in Turkey are subject to tax legislation and practices effective in Turkey.

While the corporate tax rate was at the rate of 20% since 1 January 2006, for all companies, such rate has been set as 22% for the tax bases of the years 2018, 2019, and 2020 based on the legislation of the Amendment on Certain Tax Laws and Other Laws no. 7061. Furthermore, the Council of Ministers has been authorized to reduce the rate of 22% down to 20%.

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.

Corporate tax rate is applied on the tax base calculated after the addition of the non-deductible expenses in the commercial income of corporations and deduction of exemptions stated in tax laws (such as participation income exemption) and deductions. No other tax is paid unless profit is distributed.

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 twenty-fifth 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.

XVII. Explanations on taxation (continued)

b. Deferred tax

The Group 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") and the related decrees of the BRSA concerning income taxes. In the deferred tax calculation, the enacted tax rate, in accordance with the tax legislation, is used as of the balance sheet date. The Law regarding amendments on Certain Tax Laws was approved in The Grand National Assembly of Turkey on 28 November 2017 and the Law was published in the Official Gazette on 5 December 2017. Accordingly, the corporate income tax rate will be increased from 20% to 22% for the years 2018, 2019 and 2020. According to the Law that have been enacted, deferred tax asset and liabilities shall be measured at the tax rate 22% that are expected to apply to these periods when the assets is realised or the liability is settled. For the periods 2021 and after deferred tax assets and liabilities were measured by 20% tax rate. Furthermore, the Council of Ministers has been authorized to reduce the rate of 22% down to 20%.

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 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 Communique on Disguised Profit Distribution by way of Transfer Pricing" published on 18 November 2007 explains the application related issues in detail. According to this Communique, 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 Communique's "7.1 Annual Documentation" 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.

XVIII. Explanations on borrowings

The Group, 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.

XIX. Explanation on issuance of equity securities

There are no issuance of equity securities in 2019.

XX. Explanations on guarantees and acceptances

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

XXI. Explanations on government incentives

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

XXII. Explanations on segment reporting

An operating segment is a component of an entity:

a. 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),

b. 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

c. For which discrete financial information is available.

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

XXIII. 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.

XXIV. Explanations on other disclosures

The accompanying financial statements as of 31 December 2019 are prepared and previous period financial statements are revised in accordance with the "Communique amending the Communique on the Financial Statements and Related Disclosures and Footnotes to be Announced to Public by Banks" published in the Official Gazette dated 1 February 2019 and effective starting from 1 January 2019.

XXV. Explanation on TFRS 16 leases standard

TFRS 16 Leases standard is published in the Official Gazette no. 29826 dated 16 April 2018 which is effective for the accounting periods after 31 December 2018.

The Group has started to apply the standard starting from 1 January 2019 for the first time. This standard is applied with modified retrospective approach recognizing the cumulative effect of initially applying the standard at the date of initial application. In this context, comparative financial statements are not restated.

The Group – as lessee:

The Group 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 Group.

The Group 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 Group,

(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 Group 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.

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

XXV. Explanation on TFRS 16 leases standard (continued)

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

At the commencement date, the Group measures the lease liability at the present value of the lease payments that are not paid at that date.

The lease payments are discounted using the alternative borrowing interest rate in case of implicit interest rate cannot be defined easily.

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 Group is sure at a reasonable level that purchasing option will be used,

(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 Group 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,

(c) Remeasures the carrying amount to reflect any reassessment or lease modifications, or to reflect revised in-substance fixed lease.

Reclassifications and remeasurements during the first time appliciation of TFRS 16 Leases Standard dated 1 January 2019 are presented in the table below:

	31 December 2018	TFRS 16 Reclassification Effect	TFRS 16 Measurement Effect	1 January 2019
Tangible assets(net) (*)	684,290	13,916	299,579	997,785
Other assets (**)	624,149	(13,916)	-	610,233
Lease liabilities (net) (***)	-	-	299,579	299,579

(*) In accordance with TFRS 16, the Bank recognised a lease liability and a right-of-use asset amounting to TL 299,579 as of 1 January 2019 for leases previously accounted as an operating lease under TAS 17.

(**) In accordance with TFRS 16, the Bank recognised prepaid lease expenses amounting to TL 13,916 under tangible assets as right-of-use assets which were previously classified under other assets.

(***) As of 1 January 2019, the weighted average of the alternative borrowing interest rates applied to TL lease liabilities presented in the statement of financial position of the Bank is 17.60%.

During the transition, the Group recognised lease liability concerning the lease which were previously recognised as operational leasing as per TAS 17. These liabilities were measured based on the discounted current value by using the alternative borrowing rate of interest of remaining lease payments as of 1 January 2019.

Short-term lease agreements with a duration of 12 months or less, have been evaluated within the scope of the exemption granted by the standard and their payments continue to be accounted as expense in the period they incur. Moreover, lease agreements with a remaining duration of 12 months or less as of 1 January 2019, have been evaluated within the scope of the same exemption. Within this scope, TL 16,011 has been paid in the relevant period.

Direct costs are not included while evaluating the right-of-use asset at the initial application date.

If a contract contains extention or termination terms, the Group management's judgement and assessment are used for the determination of useful life of right-of-use assets.

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

Section four

Information on financial position and risk management of the Group

I. Explanations on consolidated capital

Information about consolidated capital items

Consolidated 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."

As of 31 December 2019, the Group's total capital is TL 12,787,247 and the consolidated capital adequacy ratio is 25.57%. As of 31 December 2018, the Group's total capital amounted to TL 11,386,129 and capital adequacy ratio was 21.11%.

	Current period	Amount related to implementation before 01.01.2014 (*)
COMMON EQUITY Tier I Capital		
Paid-in capital to be entitled for compensation after all creditors	3,486,268	
Share premium	-	
Legal reserves	3,448,841	
Other comprehensive income according to TAS	223,499	
Profit	1,541,866	
Net profit for the period	1,541,866	
Prior period profit	-	
Bonus shares from investments in associates, subsidiaries and joint ventures that are not recognized in profit	-	
Minority interest	-	
Common equity tier I capital before deductions	**8,700,474**	
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	2,310	
Leasehold improvements on operational leases (-)	55,075	
Goodwill netted off deferred tax liability (-)	-	
Other intangibles netted off deferred tax liability except for mortgage servicing rights	55,155	55,155
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 4th clause of the 56th 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 (-)	-	
Amounts exceeding 15% of the common equity as per the 2nd 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	**112,540**	
Total common equity tier I capital	**8,587,934**	
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)	-	
Third parties' share in the Additional Tier I capital	-	
Third parties' share in the Additional Tier I capital (in scope of Temporary Article 3)	-	
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)	**8,587,934**	

(*) Amounts represent the amounts of items to be taken into consideration and subject to transition provisions in accordance with Temporary Articles of "Regulation on the Equity of Banks".

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

I. Explanations on consolidated capital (continued)

	Current period	Amount related to implementation before 01.01.2014 (*)
TIER II CAPITAL		
Bank's borrowing instruments and issue premiums	3,767,469	
Bank's borrowing instruments and issue premiums (in scope of Temporary Article 4)	-	
Third parties' share in the Tier II Capital	-	
Third parties' share in the Tier II Capital (in scope of Temporary Article 3)	-	
Provisions (amounts stated in Article 8 of the Regulation on the Equity of Banks)	437,239	
Tier II Capital Before Deductions	**4,204,708**	
Deductions From Tier II Capital		
Bank's direct and indirect investments in its own Tier II Capital (-)	-	
Bank's investments in 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	**4,204,708**	
Total Capital (The sum of Tier I Capital and Tier II Capital)	**12,792,642**	
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 (-)	5,395	
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	12,787,247	
Total risk weighted amounts	50,014,595	
CAPITAL ADEQUACY RATIOS		
Core Capital Adequacy Ratio (%)	17.17	
Tier I Capital Adequacy Ratio (%)	17.17	
Capital Adequacy Ratio (%)	25.57	
BUFFERS		
Total buffer requirement	2.607	
Capital protection buffer requirement (%)	2.500	
Bank specific cyclical buffer requirement (%)	0.107	
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 (%)	11.17	
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	176,061	
Amount arising from deferred tax assets based on temporary differences	-	
Limits related to provisions considered in Tier II calculation		
General provisions for standard based receivables (before ten thousand twenty five limitation)	437,239	
Up to 1.25% of total risk-weighted amount of general reserves for receivables where the standard approach used	437,239	
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	-	

(*) Amounts represent the amounts of items to be taken into consideration and subject to transition provisions in accordance with Temporary Articles of "Regulation on the Equity of Banks".

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

I. Explanations on consolidated capital (continued)

	Prior period	Amount related to implementation before 01.01.2014 (*)
COMMON EQUITY Tier I Capital		
Paid-in capital to be entitled for compensation after all creditors	3,486,268	
Share premium	-	
Legal reserves	2,297,792	
Other comprehensive income according to TAS	143,375	
Profit	1,140,634	
Net profit for the period	1,140,634	
Prior period profit	-	
Bonus shares from investments in associates, subsidiaries and joint ventures that are not recognized in profit	-	
Minority interest	-	
Common equity tier I capital before deductions	**7,068,069**	
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	13,421	
Leasehold improvements on operational leases	39,962	
Goodwill netted off deferred tax liability	-	
Other intangibles netted off deferred tax liability except for mortgage servicing rights	37,209	37,209
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 4th clause of the 56th 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 (-)	-	
Amounts exceeding 15% of the common equity as per the 2nd 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	**90,592**	
Total common equity tier I capital	**6,977,477**	
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)	-	
Third parties' share in the Additional Tier I capital	-	
Third parties' share in the Additional Tier I capital (in scope of Temporary Article 3)	-	
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)	**6,977,477**	

(*) Amounts represent the amounts of items to be taken into consideration and subject to transition provisions in accordance with Temporary Articles of "Regulation on the Equity of Banks".

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

I. Explanations on consolidated capital (continued)

	Prior period	Amount related to implementation before 01.01.2014 (*)
TIER II CAPITAL		
Bank's borrowing instruments and issue premiums	3,807,119	
Bank's borrowing instruments and issue premiums (in scope of Temporary Article 4)	-	
Third parties' share in the Tier II Capital	-	
Third parties' share in the Tier II Capital (in scope of Temporary Article 3)	-	
Provisions (amounts stated in Article 8 of the Regulation on the Equity of Banks)	609,455	
Tier II Capital Before Deductions	**4,416,574**	
Deductions From Tier II Capital		
Bank's direct and indirect investments in its own Tier II Capital (-)	-	
Bank's investments in 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	**4,416,574**	
Total Capital (The sum of Tier I Capital and Tier II Capital)	**11,394,051**	
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 Five Years	-	
Other items to be defined by the BRSA (-)	7,922	
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	11,386,129	
Total risk weighted amounts	53,932,535	
CAPITAL ADEQUACY RATIOS		
Core Capital Adequacy Ratio (%)	12.94	
Tier I Capital Adequacy Ratio (%)	12.94	
Capital Adequacy Ratio (%)	21.11	
BUFFERS		
Total buffer requirement	1.912	
Capital protection buffer requirement (%)	1.875	
Bank specific cyclical buffer requirement (%)	0.037	
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 (%)	6.937	
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	188,440	
Limits related to provisions considered in Tier II calculation		
General provisions for standard based receivables (before ten thousand twenty five limitation)	618,520	
Up to 1.25% of total risk-weighted amount of general reserves for receivables where the standard approach used	609,455	
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	-	

(*) Amounts represent the amounts of items to be taken into consideration and subject to transition provisions in accordance with Temporary Articles of "Regulation on the Equity of Banks".

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

I. Explanations on consolidated capital (continued)

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

Issuer	ING Bank N.V.	ING Bank N.V.	ING Bank N.V.
Unique identifier (e.g. CUSIP, ISIN, etc.)	-	-	-
Governing law(s) of the instrument	BRSA	BRSA	BRSA
Regulatory treatment	Supplementary capital	Supplementary capital	Supplementary capital
Subject to 10% deduction as of 1/1/2015	No	No	No
Eligible at stand-alone / consolidated	Stand alone -Consolidated	Stand alone -Consolidated	Stand alone -Consolidated
Instrument type (types to be specified by each jurisdiction)	Loan	Loan	Loan
Amount recognised in regulatory capital (Currency in million, as of most recent reporting date)	USD 82 million (TL 486 million) and EUR 72 million (TL 481 million)	USD 73 million (TL 433 million) and EUR 68 million (TL 454 million)	USD 62 million (TL 369 million) and EUR 231 million (TL 1,544 million)
Par value of instrument (Currency in million)	USD 102 million (TL 607 million) and EUR 90 million (TL 602 million)	USD 91 million (TL 541 million) and EUR 85 million (TL 568 million)	USD 62 million (TL 369 million) and EUR 231 million (TL 1,544 million)
Accounting classification	Subordinated Loans	Subordinated Loans	Subordinated Loans
Original date of issuance	11 March 2014	26 June 2014	26 May 2015
Perpetual or dated	Dated	Dated	Dated
Original maturity date	10 years	10 years	10 years
Issuer call subject to prior BRSA approval	Yes	Yes	Yes
Optional call date, contingent call dates and redemption amount	5th year	5th year	5th year
Subsequent call dates, if applicable	After 5th year	After 5th year	After 5th year
Coupons / dividends	-	-	-
Fixed or floating dividend/coupon	Floating	Floating	Floating
Coupon rate and any related index	Libor+2.78% and Euribor+2.29%	Libor+2.27% and Euribor+2.17%	Libor+2.19% and Euribor+1.68%
Existence of a dividend stopper	-	-	-
Fully discretionary, partially discretionary or mandatory	-	-	-
Existence	None	None	None
Noncumulative or cumulative	-	-	-
Convertible or non-convertible	None	None	None
If convertible, conversion trigger(s)	-	-	-
If convertible, fully or partially	-	-	-
If convertible, conversion rate	-	-	-
If convertible, mandatory or optional conversion	-	-	-
If convertible, specify instrument type convertible into	-	-	-
If convertible, specify issuer of instrument it converts into			
Write-down feature	None	None	None
If write-down, write-down trigger(s)	-	-	-
If write-down, full or partial	-	-	-
If write-down, permanent or temporary	-	-	-
If temporary write-down, description of write-up mechanism	-	-	-
Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	After the senior creditors primary subordinated loans and before the TIER I sub-debt, same with TIER II	After the senior creditors primary subordinated loans and before the TIER I sub-debt, same with TIER II	After the senior creditors primary subordinated loans and before the TIER I sub-debt, same with TIER II
Whether conditions in Articles 7 and 8 of the Regulation on the Equity of Banks are met	None	None	None
Conditions in Articles 7 and 8 of the Regulation on the Equity of Banks, which are not met	-	-	-

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

I. Explanations on consolidated capital (continued)

Explanations on reconciliation of capital items to balance sheet

Risk classifications	Carrying amount	Amounts in equity calculation
Shareholders' equity	8,538,541	8,538,541
Gains from cash flow hedge transactions	(159,623)	159,623
Leasehold improvements on operational leases	55,075	(55,075)
Goodwill and intangible assets	55,171	(55,155)
General provision	437,239	437,239
Subordinated debt (*)	4,237,398	3,767,469
Other deductions from shareholders' equity	5,395	(5,395)
Capital		**12,787,247**

(*) In accordance with the 9th Clause of the 8th Article of the "Regulation on Equity of Banks", subordinated loans of the parent bank amounting to USD 102 million and EUR 90 million and USD 91 million and EUR 85 million are amortised by 20% and then included in Tier II Capital as their remaining maturity is less than five years as of 31 December 2019.

II. Explanations on consolidated credit risk

1. The Parent 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, 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. Documentation for risk management strategy is revised at least once a year under the supervision of the Audit 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 Parent 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 Parent 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 Parent 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 Parent Bank are considered impaired loans.

The Parent Bank has started to apply TFRS 9 Financial Instruments ("TFRS 9") published by POA in the accompanying consolidated financial statements starting from 1 January 2018. Bank calculates Expected Credit Loss based provisions for credit losses.

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.

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

II. Explanations on consolidated 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	9,617,305	9,942,739	9,115,248	8,654,384
Conditional and unconditional receivables from regional or local governments	1,096,530	939,945	814,597	677,616
Conditional and unconditional receivables from administrative bodies and non-commercial enterprises	-	1	6	7
Conditional and unconditional receivables from multilateral development banks	-	-	-	-
Conditional and unconditional receivables from international organizations	-	-	-	-
Conditional and unconditional receivables from banks and brokerage houses	15,558,624	14,592,786	11,222,427	9,247,336
Conditional and unconditional receivables from corporates	24,462,248	24,871,205	27,750,897	27,883,725
Conditional and unconditional receivables from retail portfolios	14,571,744	15,273,726	17,926,789	19,536,556
Conditional and unconditional receivables secured by mortgages	2,589,507	3,321,536	3,850,485	4,498,559
Past due receivables	253,061	249,671	205,904	225,036
Receivables defined under high risk category by BRSA	1,124,324	1,012,257	818,037	417,908
Securities collateralized by mortgages	-	-	-	-
Securitization positions	-	-	-	-
Short-term receivables from banks, brokerage houses and corporates	-	-	-	-
Investments similar to collective investment funds	-	-	-	-
Stock transactions	11,390	9,886	8,286	8,277
Other receivables	2,666,356	3,624,313	2,926,203	3,333,420
Total	**71,951,089**	**73,838,065**	**74,638,879**	**74,482,824**

(*) 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.

2. 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.

3. Related to forward transactions, options and similar agreements, 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.

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

II. Explanations on consolidated 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 Group 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 Group's top 100 and 200 cash loan balances in total cash loans is 42% and 49% respectively (31 December 2018: 37% and 44%).

The proportion of the Group's top 100 and 200 customers' non-cash loan balances in total non-cash loans is 76% and 83% (31 December 2018: 74% and 80%).

The proportion of the Group's top 100 and 200 customers' cash and non-cash loan balances in total cash and non-cash loans 48% and 54% (31 December 2018: 43% and 49%).

7. Stage 1 and Stage 2 expected losses for consolidated credit risk amount to TL 437,239 (31 December 2018: TL 618,520).

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

II. Explanations on consolidated credit risk (continued)

8. Amount of profile on significant risks in significant regions

Profile on significant risks in significant regions (*)

	Risk categories (**)																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	Total
Current period																		
Domestic	9,617,305	1,096,530	-	-	-	11,215,028	23,354,235	14,568,231	2,589,240	252,980	1,124,323	-	-	-	-	11,160	2,666,356	66,495,388
European Union Countries	-	-	-	-	-	3,652,103	189,402	2,330	267	38	1	-	-	-	-	230	-	3,844,371
OECD Countries (***)	-	-	-	-	-	231,393	-	107	-	-	-	-	-	-	-	-	-	231,500
Off- Shore banking regions	-	-	-	-	-	7,262	-	-	-	-	-	-	-	-	-	-	-	7,262
USA, Canada	-	-	-	-	-	423,814	-	8	-	-	-	-	-	-	-	-	-	423,822
Other Countries	-	-	-	-	-	29,024	918,611	1,068	-	43	-	-	-	-	-	-	-	948,746
Investment and associates, subsidiaries and joint ventures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Undistributed assets / liabilities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total	**9,617,305**	**1,096,530**	**-**	**-**	**-**	**15,558,624**	**24,462,248**	**14,571,744**	**2,589,507**	**253,061**	**1,124,324**	**-**	**-**	**-**	**-**	**11,390**	**2,666,356**	**71,951,089**

	Risk categories (**)																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	Total
Prior period																		
Domestic	9,115,248	814,597	6	-	-	6,452,048	27,182,611	17,923,852	3,849,736	205,789	817,834	-	-	-	-	8,078	2,926,203	69,296,002
European Union Countries	-	-	-	-	-	3,858,359	565,640	1,744	653	53	203	-	-	-	-	208	-	4,426,860
OECD Countries (***)	-	-	-	-	-	93,750	-	138	-	-	-	-	-	-	-	-	-	93,888
Off- Shore banking regions	-	-	-	-	-	68,589	-	-	-	-	-	-	-	-	-	-	-	68,589
USA, Canada	-	-	-	-	-	532,646	-	2	96	-	-	-	-	-	-	-	-	532,744
Other Countries	-	-	-	-	-	217,035	2,646	1,053	-	62	-	-	-	-	-	-	-	220,796
Investment in associates, subsidiaries and joint ventures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Undistributed assets / liabilities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total	**9,115,248**	**814,597**	**6**	**-**	**-**	**11,222,427**	**27,750,897**	**17,926,789**	**3,850,485**	**205,904**	**818,037**	**-**	**-**	**-**	**-**	**8,286**	**2,926,203**	**74,638,879**

(*) 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

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

II. Explanations on consolidated credit risk (continued)

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

	Risk categories (**)																			
Current period	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10**	**11**	**12**	**13**	**14**	**15**	**16**	**17**	**TL**	**FC**	**Total**
Agriculture	**-**	**-**	**-**	**-**	**-**	**-**	**238,954**	**37,152**	**12,230**	**-**	**16,720**	**-**	**-**	**-**	**-**	**-**	**12**	**91,343**	**213,725**	**305,068**
Farming and raising livestock	-	-	-	-	-	-	133,516	30,272	12,133	-	13,732	-	-	-	-	-	9	76,295	113,367	189,662
Forestry	-	-	-	-	-	-	5,036	3,159	97	-	49	-	-	-	-	-	2	8,343	-	8,343
Fishing	-	-	-	-	-	-	100,402	3,721	-	-	2,939	-	-	-	-	-	1	6,705	100,358	107,063
Manufacturing	**-**	**-**	**-**	**-**	**-**	**-**	**13,122,369**	**1,878,620**	**663,526**	**-**	**329,749**	**-**	**-**	**-**	**-**	**-**	**911**	**3,874,767**	**12,120,408**	**15,995,175**
Mining	-	-	-	-	-	-	3,219,588	62,870	7,873	-	13,003	-	-	-	-	-	20	187,507	3,115,847	3,303,354
Production	-	-	-	-	-	-	9,535,262	1,792,670	650,841	-	312,632	-	-	-	-	-	849	3,598,091	8,694,163	12,292,254
Electricity, gas, water	-	-	-	-	-	-	367,519	23,080	4,812	-	4,114	-	-	-	-	-	42	89,169	310,398	399,567
Construction	**-**	**-**	**-**	**-**	**-**	**-**	**1,677,671**	**256,647**	**94,937**	**10**	**107,179**	**-**	**-**	**-**	**-**	**-**	**194**	**725,791**	**1,410,847**	**2,136,638**
Services	**6,174,182**	**-**	**-**	**-**	**-**	**15,558,614**	**9,373,973**	**2,229,233**	**875,412**	**2**	**649,583**	**-**	**-**	**-**	**-**	**10,854**	**10,374**	**18,135,889**	**16,746,338**	**34,882,227**
Wholesale and retail trade	-	-	-	-	-	-	3,548,953	1,716,626	380,567	2	515,366	-	-	-	-	-	1,044	4,276,996	1,885,562	6,162,558
Hotel food, beverage services	-	-	-	-	-	-	405,160	101,830	396,297	-	30,062	-	-	-	-	-	394	274,946	658,797	933,743
Transportation and telecommunication	-	-	-	-	-	-	1,507,584	223,778	68,937	-	51,606	-	-	-	-	-	204	545,769	1,306,340	1,852,109
Financial institutions	6,174,182	-	-	-	-	15,558,614	1,070,471	24,478	3,887	-	1,574	-	-	-	-	10,854	8,479	12,230,498	10,622,041	22,852,539
Real estate and renting service	-	-	-	-	-	-	703,952	42,327	15,797	-	10,548	-	-	-	-	-	115	407,968	364,771	772,739
Self-employment service	-	-	-	-	-	-	1,524,736	83,343	6,764	-	36,669	-	-	-	-	-	103	225,196	1,426,419	1,651,615
Education services	-	-	-	-	-	-	21,772	13,092	1,637	-	1,457	-	-	-	-	-	15	24,725	13,248	37,973
Health and social services	-	-	-	-	-	-	591,345	23,759	1,526	-	2,301	-	-	-	-	-	20	149,791	469,160	618,951
Other	**3,443,123**	**1,096,530**	**-**	**-**	**-**	**10**	**49,281**	**10,170,092**	**943,402**	**253,049**	**21,093**	**-**	**-**	**-**	**-**	**536**	**2,654,865**	**17,463,895**	**1,168,086**	**18,631,981**
Total	**9,617,305**	**1,096,530**	**-**	**-**	**-**	**15,558,624**	**24,462,248**	**14,571,744**	**2,589,507**	**253,061**	**1,124,324**	**-**	**-**	**-**	**-**	**11,390**	**2,666,356**	**40,291,685**	**31,659,404**	**71,951,089**

(*) 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

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

II. Explanations on consolidated credit risk (continued)

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

	Risk categories (**)																			
Prior period	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10**	**11**	**12**	**13**	**14**	**15**	**16**	**17**	**TL**	**FC**	**Total**
Agriculture	**-**	**-**	**-**	**-**	**-**	**-**	**247,133**	**140,040**	**20,277**	**-**	**6,553**	**-**	**-**	**-**	**-**	**-**	**-**	**257,511**	**156,492**	**414,003**
Farming and raising livestock	-	-	-	-	-	-	177,701	119,993	17,546	-	6,159	-	-	-	-	-	-	205,593	115,806	321,399
Forestry	-	-	-	-	-	-	31,600	10,877	2,566	-	308	-	-	-	-	-	-	33,950	11,401	45,351
Fishing	-	-	-	-	-	-	37,832	9,170	165	-	86	-	-	-	-	-	-	17,968	29,285	47,253
Manufacturing	**-**	**-**	**-**	**-**	**-**	**-**	**15,403,333**	**2,639,039**	**973,131**	**-**	**277,529**	**-**	**-**	**-**	**-**	**-**	**-**	**6,850,913**	**12,442,119**	**19,293,032**
Mining	-	-	-	-	-	-	3,077,155	122,316	44,403	-	8,381	-	-	-	-	-	-	278,586	2,973,669	3,252,255
Production	-	-	-	-	-	-	11,721,104	2,472,450	919,512	-	236,837	-	-	-	-	-	-	6,324,273	9,025,630	15,349,903
Electricity, gas, water	-	-	-	-	-	-	605,074	44,273	9,216	-	32,311	-	-	-	-	-	-	248,054	442,820	690,874
Construction	**-**	**-**	**-**	**-**	**-**	**-**	**1,572,023**	**536,478**	**60,313**	**-**	**90,821**	**-**	**-**	**-**	**-**	**-**	**-**	**1,131,818**	**1,127,817**	**2,259,635**
Services	**7,269,162**	**-**	**-**	**-**	**-**	**11,171,634**	**10,385,443**	**4,350,066**	**1,610,984**	**-**	**425,688**	**-**	**-**	**-**	**-**	**7,772**	**-**	**18,723,120**	**16,497,629**	**35,220,749**
Wholesale and retail trade	-	-	-	-	-	-	4,839,368	3,531,029	685,427	-	357,681	-	-	-	-	-	-	7,757,538	1,655,967	9,413,505
Hotel food, beverage services	-	-	-	-	-	-	729,440	158,398	757,021	-	7,271	-	-	-	-	-	-	424,047	1,228,083	1,652,130
Transportation and telecommunication	-	-	-	-	-	-	1,718,831	318,467	67,037	-	36,013	-	-	-	-	-	-	766,907	1,373,441	2,140,348
Financial institutions	7,269,162	-	-	-	-	11,171,634	603,689	19,421	5,228	-	1,147	-	-	-	-	7,772	-	8,740,989	10,337,064	19,078,053
Real estate and renting service	-	-	-	-	-	-	856,431	85,262	26,406	-	2,953	-	-	-	-	-	-	568,567	402,485	971,052
Self-employment service	-	-	-	-	-	-	1,279,484	150,611	16,497	-	16,108	-	-	-	-	-	-	275,820	1,186,880	1,462,700
Education services	-	-	-	-	-	-	6,801	25,123	21,965	-	2,436	-	-	-	-	-	-	41,194	15,131	56,325
Health and social services	-	-	-	-	-	-	351,399	61,755	31,403	-	2,079	-	-	-	-	-	-	148,058	298,578	446,636
Other	**1,846,086**	**814,597**	**6**	**-**	**-**	**50,793**	**142,965**	**10,261,166**	**1,185,780**	**205,904**	**17,446**	**-**	**-**	**-**	**-**	**514**	**2,926,203**	**15,843,256**	**1,608,204**	**17,451,460**
Total	**9,115,248**	**814,597**	**6**	**-**	**-**	**11,222,427**	**27,750,897**	**17,926,789**	**3,850,485**	**205,904**	**818,037**	**-**	**-**	**-**	**-**	**8,286**	**2,926,203**	**42,806,618**	**31,832,261**	**74,638,879**

(*) 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

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

II. Explanations on consolidated 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	6,178,915	519,002	151,947	1,326,484	1,440,957	-	9,617,305
Conditional and unconditional receivables from regional or local governments	-	-	-	-	1,096,530	-	1,096,530
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	9,415,755	380,798	534,284	1,813,364	2,168,048	1,246,375	15,558,624
Conditional and unconditional receivables from corporates	729,807	1,605,663	3,166,383	3,784,647	12,540,590	2,635,158	24,462,248
Conditional and unconditional receivables from retail portfolios	403,325	753,871	921,842	1,903,191	9,807,329	782,186	14,571,744
Conditional and unconditional receivables secured by mortgages	19,995	89,574	94,750	210,364	1,870,020	304,804	2,589,507
Past due receivables	-	-	-	-	-	253,061	253,061
Receivables defined under high risk category by BRSA	-	-	-	-	-	1,124,324	1,124,324
Securities collateralized by mortgages	-	-	-	-	-	-	-
Securitization positions	-	-	-	-	-	-	-
Short-term receivables from banks, brokerage houses and corporates	-	-	-	-	-	-	-
Investments similar to collective investment funds	-	-	-	-	-	-	-
Stock transactions	-	-	-	-	-	11,390	11,390
Other receivables	-	-	-	-	-	2,666,356	2,666,356
Total	**16,747,797**	**3,348,908**	**4,869,206**	**9,038,050**	**28,923,474**	**9,023,654**	**71,951,089**

(*) 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	7,267,861	-	-	-	1,834,792	12,595	9,115,248
Conditional and unconditional receivables from regional or local governments	-	18,474	135	-	795,988	-	814,597
Conditional and unconditional receivables from administrative bodies and non-commercial enterprises	-	-	-	-	-	6	6
Conditional and unconditional receivables from multilateral development banks	-	-	-	-	-	-	-
Conditional and unconditional receivables from international organizations	-	-	-	-	-	-	-
Conditional and unconditional receivables from banks and brokerage houses	5,055,638	467,755	246,473	1,008,208	3,847,455	596,898	11,222,427
Conditional and unconditional receivables from corporates	2,602,279	2,332,417	2,532,548	1,960,953	15,668,727	2,653,973	27,750,897
Conditional and unconditional receivables from retail portfolios	493,508	1,035,991	1,181,986	1,905,775	12,430,979	878,550	17,926,789
Conditional and unconditional receivables secured by mortgages	53,285	145,919	113,102	332,315	2,613,932	591,932	3,850,485
Past due receivables	-	-	-	-	-	205,904	205,904
Receivables defined under high risk category by BRSA	-	-	-	-	-	818,037	818,037
Securities collateralized by mortgages	-	-	-	-	-	-	-
Securitization positions	-	-	-	-	-	-	-
Short-term receivables from banks, brokerage houses and corporates	-	-	-	-	-	-	-
Investments similar to collective investment funds	-	-	-	-	-	-	-
Stock transactions	-	-	-	-	-	8,286	8,286
Other receivables	-	-	-	-	-	2,926,203	2,926,203
Total	**15,472,571**	**4,000,556**	**4,074,244**	**5,207,251**	**37,191,873**	**8,692,384**	**74,638,879**

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

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

II. Explanations on consolidated 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 6 of the Regulation on Measurement and Assessment of Capital Adequacy of Banks, the Parent Bank uses the ratings provided by international rating firm, Fitch Ratings in the Credit Risk Based Amount calculations as of 31 December 2019. 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.

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 rating note	AAA and AA-	A+ and A-	BBB+ and BBB-	BB+ and BB-	B+ and B-	CCC+ and below

Risk amounts based on risk weights

Current period	0%	10%	20%	35%	50%	75%	100%	150%	200%	250%	1250%	Deducted from equity
Amount before credit risk mitigation	9,533,830	-	10,668,839	-	3,777,579	15,925,949	31,640,690	404,202	-	-	-	117,935
Amount after credit risk mitigation	11,586,213	-	2,383,688	1,037,933	5,130,728	12,990,101	29,842,188	404,202	-	-	-	117,935

Prior period	0%	10%	20%	35%	50%	75%	100%	150%	200%	250%	1250%	Deducted from equity
Amount before credit risk mitigation	8,474,406	-	5,585,466	-	4,235,217	19,956,486	35,893,824	493,480	-	-	-	98,514
Amount after credit risk mitigation	13,253,370	-	1,362,583	1,475,610	6,296,359	14,194,249	32,961,908	493,480	-	-	-	98,514

12. Miscellaneous information regarding important sectors or counterparty type

The Parent Bank evaluates its financial assets in 3 stages based on TFRS 9 as explained in section three note VIII. In this respect, the life time 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 life time expected credit losses are calculated for these loans (stage 2).

For loans in stage 1, 12-month 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 (*)		
	Impaired (TFRS 9)		Expected credit losses (TFRS 9)
Important sectors / Counterparties	Significant increase in credit risk (Stage 2)	Defaulted (Stage 3)	
Agriculture	**13,809**	**32,857**	**17,839**
Farming and raising livestock	13,225	27,247	14,425
Forestry	534	988	989
Fishing	50	4,622	2,425
Manufacturing	**1,137,798**	**648,254**	**428,718**
Mining	259,026	44,171	55,919
Production	868,218	562,455	334,720
Electricity, gas, water	10,554	41,628	38,079
Construction	**276,799**	**252,626**	**162,253**
Services	**1,749,935**	**1,356,270**	**861,570**
Wholesale and retail trade	641,428	1,067,327	594,255
Hotel food, beverage services	249,495	84,201	65,256
Transportation and telecommunication	343,065	97,517	96,011
Financial institutions	233,389	2,584	14,385
Real estate and lending service	176,274	18,147	21,645
Self-employment service	48,405	77,602	56,006
Education service	18,536	3,145	3,565
Health and social services	39,343	5,747	10,447
Other	**1,365,869**	**683,609**	**512,080**
Total	**4,544,210**	**2,973,616**	**1,982,460**

(*) Represents the distribution of cash loans, factoring receivables and receivables from leasing transactions.

II. Explanations on consolidated credit risk (continued)

Prior period	Loans (*)		
	Impaired (TFRS 9)		Expected credit losses (TFRS 9)
Important sectors / Counterparties	Significant increase in credit risk (Stage 2)	Defaulted (Stage 3)	
Agriculture	**163,563**	**13,415**	**12,596**
Farming and raising livestock	118,544	11,690	10,407
Forestry	1,981	1,531	1,337
Fishing	43,038	194	852
Manufacturing	**2,725,150**	**514,153**	**372,843**
Mining	107,150	40,483	51,763
Production	2,579,739	428,065	305,938
Electricity, gas, water	38,261	45,605	15,142
Construction	**516,384**	**193,156**	**131,251**
Services	**5,477,385**	**798,189**	**611,561**
Wholesale and retail trade	2,485,836	686,239	436,891
Hotel food, beverage services	850,189	14,814	50,113
Transportation and telecommunication	288,728	56,396	53,533
Financial institutions	1,233,915	2,029	2,421
Real estate and lending service	328,168	6,232	32,402
Self-employment service	232,499	23,565	25,448
Education service	18,917	3,567	2,692
Health and social services	39,133	5,347	8,061
Other	**3,148,860**	**569,877**	**491,467**
Total	**12,031,342**	**2,088,790**	**1,619,718**

(*) Represents the distribution of cash loans, factoring receivables and receivables from leasing transactions.

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	1,093,143	1,169,666	(634,215)	-	**1,628,594**
Stage 1 and stage 2 provisions (**)	622,581	241,560	(418,151)	-	**445,990**

Prior period	Opening balance	Provisions made within the term	Provision cancellations	Other adjustments (*)	Closing balance
Stage 3 provision	1,174,407	577,124	(658,388)	-	**1,093,143**
Stage 1 and stage 2 provisions (**)	419,987	536,924	(334,330)	-	**622,581**

(*) 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	38,547,587	257,250	38,804,837
Azerbaijan	915,636	-	915,636
United Kingdom	98,552	873,151	971,703
Germany	64,645	108	64,753
France	56,607	299,699	356,306
Holland	56,034	32,070	88,104
Greece	43,184	-	43,184
Romania	41,081	2	41,083
Switzerland	33,819	-	33,819
Belgium	23,069	-	23,069
Other	83,912	175,864	259,776

III. Explanations on consolidated 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 managed foreign exchange position limits scope. The results of measurements are shared periodically with senior management, Asset Liability Committee, Audit 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 Parent Bank for the thirty days before the balance sheet date are 5.8565 (Full TL) and 6.5067 (Full TL) respectively.

The Parent 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 Parent Bank's "foreign exchange buying rates" (31 December 2019)	5.9501	6.6843
Previous days;		
30 December 2019	5.9493	6.6567
27 December 2019	5.9579	6.6449
26 December 2019	5.9561	6.5994
25 December 2019	5.9561	6.5994
24 December 2019	5.9561	6.5994

III. Explanation on consolidated currency risk (continued)

Information related to consolidated 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	3,780,694	1,909,773	1,086,882	6,777,349
Banks	571,020	147,804	423,451	1,142,275
Financial assets at fair value through profit or loss	84,948	77,955	-	162,903
Money market placements	-	-	-	-
Financial assets measured at fair value through other comprehensive income	229	-	-	229
Loans	14,340,721	4,615,140	10,919	18,966,780
Investments in associates, subsidiaries and joint ventures	-	-	-	-
Financial assets measured at amortised cost	-	-	-	-
Hedging derivative financial assets	1,117	-	-	1,117
Tangible assets (net)	5	-	-	5
Intangible assets (net)	-	-	-	-
Other assets	11,596	1,639	184	13,419
Total assets	**18,790,330**	**6,752,311**	**1,521,436**	**27,064,077**
Liabilities				
Bank deposit	1,753,235	365,788	39	2,119,062
Foreign currency deposits	4,282,543	8,451,449	760,677	13,494,669
Funds from interbank money market	82,601	-	-	82,601
Borrowings	8,391,859	6,380,490	9,176	14,781,525
Marketable securities issued (net)	-	-	-	-
Miscellaneous payables	23,320	61,254	281	84,855
Hedging derivative financial liabilities	6,658	-	-	6,658
Other liabilities	35,548	36,734	2,225	74,507
Total liabilities	**14,575,764**	**15,295,715**	**772,398**	**30,643,877**
Net on balance sheet position	**4,214,566**	**(8,543,404)**	**749,038**	**(3,579,800)**
Net off-balance sheet position	**(4,150,149)**	**8,509,846**	**(746,180)**	**3,613,517**
Financial derivative assets	8,256,456	17,482,865	1,416,254	27,155,575
Financial derivative liabilities	12,406,605	8,973,019	2,162,434	23,542,058
Non-cash loans	**1,966,600**	**4,500,994**	**203,286**	**6,670,880**
Prior period				
Total assets	**19,288,721**	**7,286,112**	**1,280,144**	**27,854,977**
Total liabilities	**18,983,367**	**17,697,027**	**530,099**	**37,210,493**
Net on-balance sheet position	**305,354**	**(10,410,915)**	**750,045**	**(9,355,516)**
Net off-balance sheet position	**(244,335)**	**10,388,022**	**(748,022)**	**9,395,665**
Financial derivative assets	7,987,608	19,364,401	1,196,112	28,548,121
Financial derivative liabilities	8,231,943	8,976,379	1,944,134	19,152,456
Non-cash loans	**1,499,749**	**5,015,658**	**209,249**	**6,724,656**

In the foreign currency risk table:

The principal and accrual amount of the foreign currency indexed loans amounting to TL 130,287 (31 December 2018: TL 458,100) is presented in the loans line.

III. Explanation on consolidated currency risk (continued)

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 115,268 (31 December 2018: TL 301,893).
Prepaid expenses: TL 575 (31 December 2018: TL 628).
Held-for trading derivative financial liabilities: TL 148,763 (31 December 2018: TL 181,638).
Hedge funds (Effective Portion): TL (6,447) (31 December 2018: TL (4,482)).
Interest rate swap (buy) transactions and options (buy): TL 8,862,138 (31 December 2018: TL 4,680,290).
Interest rate swap (sell) transactions and options (sell): TL 8,862,138 (31 December 2018: TL 4,680,290).

As of 31 December 2019, there are no foreign currency indexed factoring guarantees stated in non-cash loans (31 December 2018: TL 438).

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

Forward foreign currency-buy transactions: TL 2,085,348 (31 December 2018: TL 454,812).
Forward foreign currency-sell transactions: TL 1,901,122 (31 December 2018: TL 441,022).

Sensitivity to currency risk

Table below shows the sensitivity of the Group 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 2019	31 December 2018	31 December 2019	31 December 2018
USD	10% increase	(3,356)	(2,289)	-	-
USD	10% decrease	3,356	2,289	-	-
EURO	10% increase	6,442	6,102	(645)	(448)
EURO	10% decrease	(6,442)	(6,102)	645	448

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

IV. Explanations on consolidated interest rate risk

Interest risk, which refers to the loss which interest sensitive assets and liabilities in and off balance sheet that might be subject to due to the changes in the interest rate as a result of maturity 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 risk limit for trading book, sensitivity limit against interest rate shocks has been determined under trading books and banking books. Capital requirement relating 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 provided that the limits determined by the Board of Directors are not exceeded, and interest rate risk is managed by ensuring optimum balance between fixed and floating rate assets within the balance sheet.

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

IV. Explanations on consolidated 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	6,173,942	-	-	-	-	1,253,614	7,427,556
Banks	764,357	-	-	-	-	391,720	1,156,077
Financial assets at fair value through profit and loss	600,153	1,885,382	89,787	191,066	11,805	35	2,778,228
Money market placements	8,256,577	-	-	-	-	-	8,256,577
Financial assets measured at fair value through other comprehensive income	149,177	303,234	191,169	722,053	-	11,390	1,377,023
Loans (***)	11,494,092	4,363,350	11,735,125	11,374,379	751,546	1,097,884	40,816,376
Financial assets measured at amortised cost	39,629	1,202,325	381,325	491,292	-	-	2,114,571
Other assets (*)	-	-	-	-	-	1,507,406	1,507,406
Total assets	**27,477,927**	**7,754,291**	**12,397,406**	**12,778,790**	**763,351**	**4,262,049**	**65,433,814**
Liabilities							
Bank deposits	2,119,017	-	-	-	-	6,297	2,125,314
Other deposits	30,431,202	1,432,378	187,090	1,107	-	4,792,635	36,844,412
Money market borrowings	14,228	-	-	82,601	-	-	96,829
Miscellaneous payables	94,267	-	-	-	-	429,521	523,788
Securities issued	-	-	-	-	-	-	-
Funds obtained from other financial institutions	8,083,545	4,546,414	1,276,179	1,188,904	-	-	15,095,042
Other liabilities (**)	430,637	555,167	68,734	75,904	-	9,617,987	10,748,429
Total liabilities	**41,172,896**	**6,533,959**	**1,532,003**	**1,348,516**	**-**	**14,846,440**	**65,433,814**
Balance sheet long position	-	1,220,332	10,865,403	11,430,274	763,351	-	24,279,360
Balance sheet short position	(13,694,969)	-	-	-	-	(10,584,391)	(24,279,360)
Off-balance sheet long position	234,833	2,659,036	-	879,280	-	-	3,773,149
Off-balance sheet short position	-	-	(1,688,216)	-	(281,638)	-	(1,969,854)
Total positions	**(13,460,136)**	**3,879,368**	**9,177,187**	**12,309,554**	**481,713**	**(10,584,391)**	**1,803,295**

(*) Non-interest bearing column in other assets line consists of tangible assets, intangible assets, current tax asset, deferred tax asset, assets held for sale, interest-free part of finance lease receivables, interest-free part of factoring receivables, expected loss provisions for non-credit financial assets and other assets.

(**) Non-interest bearing column in other liabilities line consists of other foreign liabilities, provisions, loan liabilities, lease payables, taxes payable and equity.

(***) Non-performing loans are presented under "non-interest bearing" column.

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	7,244,807	23,054	-	-	-	1,642,376	8,910,237
Due from other banks and financial institutions	540,755	12,383	-	-	-	596,041	1,149,179
Financial assets at fair value through profit and loss	141,628	189,714	247,324	16,424	-	48	595,138
Money market placements	4,358,089	2,000	-	-	-	-	4,360,089
Available-for-sale financial assets	30	263,210	8,849	367,708	-	8,286	648,083
Loans and receivables	7,710,048	4,801,283	10,924,225	21,243,744	2,078,629	461,705	47,219,634
Held-to-maturity investments	-	245,961	949,035	-	-	-	1,194,996
Other assets (*)	796,624	2,172,287	-	-	-	1,365,815	4,334,726
Total assets	**20,791,981**	**7,709,892**	**12,129,433**	**21,627,876**	**2,078,629**	**4,074,271**	**68,412,082**
Liabilities							
Bank deposits	-	-	-	-	-	2,291,934	2,291,934
Other deposits	24,503,773	1,597,129	434,870	170	-	3,449,561	29,985,503
Money market borrowings	2,188	-	-	-	20,428	-	22,616
Miscellaneous payables	-	-	-	-	-	578,237	578,237
Securities issued	-	-	-	-	-	-	-
Funds obtained from other financial institutions	3,831,829	9,418,515	6,061,329	2,050,483	3,818,740	-	25,180,896
Other liabilities (**)	353,872	337,388	405,895	15,253	-	9,240,488	10,352,896
Total liabilities	**28,691,662**	**11,353,032**	**6,902,094**	**2,065,906**	**3,839,168**	**15,560,220**	**68,412,082**
Balance sheet long position	-	-	5,227,339	19,561,970	-	-	24,789,309
Balance sheet short position	(7,899,681)	(3,643,140)	-	-	(1,760,539)	(11,485,949)	(24,789,309)
Off-balance sheet long position	4,426,576	10,107,379	-	-	-	-	14,533,955
Off-balance sheet short position	-	-	(4,805,614)	(7,375,467)	(530,121)	-	(12,711,202)
Total position	**(3,473,105)**	**6,464,239**	**421,725**	**12,186,503**	**(2,290,660)**	**(11,485,949)**	**1,822,753**

(*) Non-interest bearing column in other assets line consists of property and equipment, intangible assets, current tax asset, deferred tax asset, assets held for sale, interest-free part of finance lease receivables, interest-free part of factoring receivables, expected loss provisions for non-credit financial assets and other assets.

(**) Non-interest bearing column in other liabilities line consists of other foreign liabilities, provisions, taxes payable and equity.

IV. Explanations on consolidated interest rate risk (continued)

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

Current period	EURO (%)	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	(0.19)	1.21	-	10.91
Financial assets at fair value through profit and loss	2.04	6.46	-	-
Money market placements	-	-	-	10.83
Financial assets measured at fair value through other comprehensive income	-	-	-	16.07
Loans	3.12	5.52	-	16.91
Financial assets measured at amortised cost	-	-	-	17.79
Liabilities				
Bank deposits	-	1.75	-	-
Other deposits	0.31	1.65	0.05	9.83
Money market borrowings	-	-	-	8.50
Miscellaneous payables	-	-	-	-
Securities issued	-	-	-	-
Funds obtained from other financial institutions	0.70	3.28	-	12.69

Prior period average interest rates applied to monetary financial instruments by the Group

Prior period	EURO (%)	USD (%)	Yen (%)	TL (%)
Assets				
Cash (Cash in vault, foreign currency cash, money in transit, checks purchased) and balances with the Central Bank of Turkey	-	2.00	-	13.00
Due from other banks and financial institutions	1.22	4.03	-	23.53
Financial assets at fair value through profit and loss	2.14	6.95	-	15.16
Money market placements	-	-	-	24.18
Financial assets available-for-sale	-	-	-	15.24
Loans and receivables	3.36	6.24	-	20.66
Held-to-maturity investments	-	-	-	19.82
Liabilities				
Bank deposits	(0.36)	2.39	-	-
Other deposits	0.48	2.71	-	18.72
Money market borrowings	-	-	-	15.00
Miscellaneous payables	-	-	-	-
Securities issued	-	-	-	-
Funds obtained from other financial institutions	0.69	3.83	-	13.91

V. Explanations on equity securities position risk derived from consolidated 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	**11,390**	**3,196**	**3,196**
Equity investments	11,390	3,196	3,196
Financials subsidiaries	**-**	**-**	**-**
Financials subsidiaries	-	-	-

Prior period	Carrying value	Fair value (*)	Market value
Quoted	**-**	**-**	**-**
Equity investments	-	-	-
Not quoted	**8,286**	**3,052**	**3,052**
Equity investments	8,286	3,052	3,052
Financials subsidiaries	**-**	**-**	**-**
Financials subsidiaries	-	-	-

(*) 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

		Revaluation increases		Unrealized gains/ losses		
Current period	**Realized gains/losses during the period**	**Total**	**Including into the additional capital**	**Total**	**Including into the core capital**	**Including into the additional capital**
Private equity investments	-	-	-	-	-	-
Shares traded on a stock Exchange	-	-	-	-	-	-
Other stocks	-	127	-	(254)	(254)	-
Total	**-**	**127**	**-**	**(254)**	**(254)**	**-**

		Revaluation increases		Unrealized gains/ losses		
Prior period	**Realized gains/losses during the period**	**Total**	**Including into the supplementary capital**	**Total**	**Including into the core capital**	**Including into the supplementary capital**
Private equity investments	-	-	-	-	-	-
Shares traded on a stock Exchange	-	-	-	-	-	-
Other stocks	-	127	-	(254)	(254)	-
Total	**-**	**127**	**-**	**(254)**	**(254)**	**-**

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	11,390	11,390	911

Prior period	Carrying value	Total RWA	Minimum capital requirement (*)
Private equity investments	-	-	-
Shares traded on a stock exchange	-	-	-
Other equity shares	8,286	8,286	663

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

VI. Explanations on consolidated liquidity risk management and liquidity coverage ratio

1. Information on matters related to consolidated liquidity risk

a. Information on liquidity risk management, such as risk capacity, responsibilities and the structure of liquidity risk management, the Parent 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") which includes measures to be taken and practices that might be applied in normal and stressed economic conditions for liquidity risk management and responsibilities of the senior management was formed. 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 under the Asset Liability Committee which senior representatives of businesses are members of the Committee.

In accordance with the provisions of the policy, a liquidity buffer that can supply adequate liquidity level under any economic circumstances and which is not subject to the collateral, has been determined. In addition, the Contingency Funding Plan to be implemented in times of stress is currently in force. Besides, Asset Liability Committee and Board of Directors approved liquidity risk appetite has been established in order to enable monitoring and managing the risk numerically. The relevant parameters are analyzed regularly and reported to the members of Asset Liability Committee and Board of Directors.

Furthermore, the Bank's liquidity buffers are 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 the Risk Control Self- Assessment process still within scope of ILAAP, in the Risk Control Self- Assessment process, comprehensive assessments are done related to liquidity risk, and after the relevant risks are identified, their potential financial impact on the Bank's operations and the impact on risk metrics is assessed periodically.

To ensure proactive management of funding liquidity risk, risk thresholds specified on the deposit movements and early warning signals are monitored. The Contingency Funding Plan monitoring metrics are not limited to this scope but also include other liquidity risk indicators. The Contingency Funding plan monitoring metrics can trigger decision-making conditions on whether the Bank will implement the Contingency Funding Plan in order to anticipate the potential development in liquidity stress incidents.

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

The liquidity risk of the Bank is managed by the Asset and 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 determined 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 Parent 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, factors which may affect the ability to create additional funding can be followed closely by senior management and the validity of the estimated funding generation capacity can be monitored.

VI. Explanations on consolidated liquidity risk management and liquidity coverage ratio (continued)

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

Almost all of the Bank's liabilities are in TL, USD or EURO, and TL funds consist of mainly equity and deposits. The Parent Bank's liquidity in TL is managed via repo / reverse repo transactions with / in CBRT/BIST using high quality securities owned by the Parent 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 set by the Board of Directors. Foreign currency funds are obtained through FC deposit and foreign based FC borrowings including syndications. Liquidity shortage/surplus values are calculated on a daily basis by Asset and Liability Management and these values are reported to the Asset Liability Committee. 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 Parent Bank has TL/FC borrowing limits ready to use in CBT 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 Funding Plan monitoring indicators are continuously monitored and reported regularly to Asset Liability 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 measures were set in the Contingency Funding Plan to bring the Parent 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 measures depending on the financial impact and stress scenarios, execution time of the measures are also explained.

e. Information on the use of stress tests

The Parent Bank has a written liquidity stress testing procedure which includes the implementation of stress testing and responsibilities, is approved by Asset Liability Committee. To ensure that the existing positions remain within risk tolerance, the Market Risk Management and Product Control Group plans, designs, manages the stress tests, reports the results to Asset Liability Committee and Board of Directors on a regularly basis and reviews the stress tests annually. Stress test scenarios of the Parent Bank consider Bank specific, market-wide and combined cases, 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 business lines. On the other hand, results of stress testing are used as the leading indicator within the process of activating the Contingency Funding Plan.

f. Overview on emergency and contingency liquidity situation plans

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

VI. Explanations on consolidated liquidity risk management and liquidity coverage 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 Parent Bank calculates and shares the Consolidated Liquidity Coverage Ratio to BRSA on a monthly basis Consolidated Liquidity Coverage Ratio is above the values stated in the regulation.

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

	Minimum	Date	Maximum	Date
TL+FC	224.31%	31 December 2019	290.59%	31 October 2019
FC	132.08%	31 December 2019	172.68%	31 October 2019

Liquidity coverage ratio

	Total unweighted value (*)		Total weighted value(*)	
Current period	**TL+FC**	**FC**	**TL+FC**	**FC**
High quality liquid assets				
High quality liquid assets			21,030,497	8,931,765
Cash Outflows				
Real person and retail deposits	31,533,658	10,406,764	2,598,352	1,040,676
Stable deposits	11,100,283	-	555,014	-
Less stable deposits	20,433,375	10,406,764	2,043,338	1,040,676
Unsecured funding other than real person and retail deposits	8,848,662	6,247,063	6,145,060	4,568,459
Operational deposits	136,952	7,742	34,238	1,936
Non-operational deposits	7,045,852	5,434,776	4,526,093	3,778,346
Other unsecured debt	1,665,858	804,545	1,584,729	788,177
Secured funding			-	-
Other cash outflows	16,156,005	8,886,681	6,259,249	3,650,950
Derivative exposures and collateral completion liabilities	4,679,082	2,473,231	4,679,082	2,473,232
Payables due to structured financial instruments	-	-	-	-
Payment commitments and other off-balance sheet commitments granted for debts to financial markets	11,476,923	6,413,450	1,580,167	1,177,718
Other contractual funding obligations	-	-	-	-
Other irrevocable or conditionally revocable off balance sheet liabilities	-	-	-	-
Total cash outflows			**15,002,661**	**9,260,085**
Cash inflows				
Secured lending	7,918,533	-	-	-
Unsecured lending	4,078,226	1,716,077	2,745,217	1,293,743
Other cash inflows	4,316,203	2,175,522	4,037,055	2,171,412
Total cash inflows	**16,312,962**	**3,891,599**	**6,782,272**	**3,465,155**
			Total adjusted value	
Total high quality liquid assets stock			21,030,497	8,931,765
Total net cash outflows			8,220,389	5,794,930
Liquidity coverage ratio (%)			**260.55**	**156.18**

(*) Simple arithmetic average calculated for the last three months by using the amounts calculated based on monthly simple arithmetic averages.

VI. Explanations on consolidated liquidity risk management and liquidity coverage ratio (continued)

	Total unweighted value (*)		Total weighted value (*)	
Prior period	**TL+FC**	**FC**	**TL+FC**	**FC**
High quality liquid assets				
High quality liquid assets			12,904,684	9,163,222
Cash Outflows				
Real person and retail deposits	26,669,014	8,112,037	2,250,603	811,204
Stable deposits	8,325,974	-	416,299	-
Less stable deposits	18,343,040	8,112,037	1,834,304	811,204
Unsecured funding other than real person and retail deposits	5,409,212	2,966,755	3,199,013	1,653,489
Operational deposits	170,480	6,441	42,620	1,610
Non-operational deposits	3,581,057	2,256,876	1,564,309	948,876
Other unsecured debt	1,657,675	703,438	1,592,084	703,003
Secured funding			-	-
Other cash outflows	26,024,760	14,275,903	14,343,428	8,267,821
Derivative exposures and collateral completion liabilities	12,582,760	6,997,432	12,582,759	6,997,432
Payables due to structured financial instruments	-	-	-	-
Payment commitments and other off-balance sheet commitments granted for debts to financial markets	13,442,000	7,278,471	1,760,669	1,270,389
Other contractual funding obligations	-	-	-	-
Other irrevocable or conditionally revocable off balance sheet liabilities	-	-	-	-
Total cash outflows			**19,793,044**	**10,732,514**
Cash inflows				
Secured lending	1,234,061	-	-	-
Unsecured lending	8,226,156	3,185,546	5,616,708	2,711,993
Other cash inflows	9,625,600	5,590,894	9,356,784	5,579,380
Total cash inflows	**19,085,817**	**8,776,440**	**14,973,492**	**8,291,373**
				Total adjusted value
Total high quality liquid assets stock			12,904,684	9,163,222
Total net cash outflows			5,244,047	3,034,373
Liquidity coverage ratio (%)			**247.41**	**307.45**

(*) Simple arithmetic average calculated for the last three months by using the amounts calculated based on monthly simple arithmetic averages.

VI. Explanations on consolidated liquidity risk management and liquidity coverage ratio (continued)

3. Other explanations on consolidated liquidity coverage ratio

Short term liquidity is managed within the regulatory limits in the Group, 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 Group's unencumbered 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 Group.

The Group evaluates cash equivalents, time and demand deposit accounts held in Central Bank of Turkey, 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 Group 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 Group'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 Group for a longer period compared to its original maturity.

Details of the Group's foreign currency balance sheet as of 31 December 2019 are summarized as follows:

Foreign currency deposits constitute the majority of the foreign currency liabilities. 48% of the Group's total foreign currency liabilities consist of funds obtained from other financial institutions and subordinated loans and 51% is composed of deposits. Loans, factoring receivables and leasing receivables comprise 70% and cash and cash equivalents comprise 29% of the foreign currency assets. The bank placements have the shortest maturity within the assets denominated in foreign currency.

Details of the Group's Turkish Lira balance sheet as of 31 December 2019 are summarized as follows:

The majority of Turkish Lira balance sheet's liability consists of deposits. 67% of the Group's total Turkish Lira liabilities consists of deposits. However, in case of necessity, the Group has borrowing facilities both in domestic & foreign banks and Takasbank & BIST repo market. 57% of the assets in Turkish Lira balance sheet are loans, factoring receivables and leasing receivables, 23% are cash and cash equivalents and 9% are marketable securities.

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

The liquidity needs and surpluses of consolidated subsidiaries of the Parent Bank are regularly monitored and managed. There are no operational or legal constraints preventing liquidity transfer. In the analyses made, it is seen that the effect of subsidiaries on the liquidity structure of the Parent Bank is limited compared to the size of the balance sheet.

VI. Explanations on consolidated liquidity risk management and liquidity coverage 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	3,063,123	4,364,433	-	-	-	-	-	7,427,556
Banks	831,964	324,113	-	-	-	-	-	1,156,077
Financial assets at fair value through profit or loss	-	168,520	421,860	506,843	1,665,806	15,164	35	2,778,228
Money market placements	-	8,256,577	-	-	-	-	-	8,256,577
Financial assets measured at fair value through other comprehensive income	-	144,414	274,887	193,433	748,095	4,804	11,390	1,377,023
Loans	97,201	4,772,987	3,848,703	14,294,526	15,843,907	967,029	992,023	40,816,376
Financial assets measured at amortised cost	-	39,629	295,277	1,204,844	574,821	-	-	2,114,571
Other assets (*)	-	-	-	-	-	-	1,507,406	1,507,406
Total assets	**3,992,288**	**18,070,673**	**4,840,727**	**16,199,646**	**18,832,629**	**986,997**	**2,510,854**	**65,433,814**
Liabilities								
Bank deposits	2,005,107	120,207	-	-	-	-	-	2,125,314
Other deposits	4,945,805	30,278,031	1,432,378	187,090	1,108	-	-	36,844,412
Borrowings	-	334,241	837,631	3,571,433	8,233,955	2,117,782	-	15,095,042
Funds from interbank money market	-	14,228	-	-	82,601	-	-	96,829
Securities issued	-	-	-	-	-	-	-	-
Miscellaneous payables	230,509	-	-	-	-	-	293,279	523,788
Other liabilities (**)	-	415,367	73,145	300,052	429,991	64,913	9,464,961	10,748,429
Total liabilities	**7,181,421**	**31,162,074**	**2,343,154**	**4,058,575**	**8,747,655**	**2,182,695**	**9,758,240**	**65,433,814**
Liquidity deficit/surplus	**(3,189,133)**	**(13,091,401)**	**2,497,573**	**12,141,071**	**10,084,974**	**(1,195,698)**	**(7,247,386)**	**-**
Net Off Balance Sheet Position	**-**	**(48,798)**	**224,210**	**289,024**	**1,360,511**	**-**	**-**	**1,824,947**
Derivative financial assets	-	15,608,412	7,431,759	13,060,966	11,058,809	522,000	-	47,681,946
Derivative financial liabilities	-	15,657,210	7,207,549	12,771,942	9,698,298	522,000	-	45,856,999
Non-cash loans	**237,381**	**357,424**	**901,563**	**4,728,876**	**1,253,702**	**861,528**	**-**	**8,340,474**
Prior period								
Total assets	2,246,751	20,140,198	5,506,444	13,606,587	23,701,986	1,382,596	1,827,520	68,412,082
Total liabilities	6,949,197	25,044,470	3,620,877	6,920,301	12,127,993	5,138,221	8,611,023	68,412,082
Liquidity deficit/surplus	**(4,702,446)**	**(4,904,272)**	**1,885,567**	**6,686,286**	**11,573,993**	**(3,755,625)**	**(6,783,503)**	**-**
Net Off Balance Sheet Position	**-**	**(129,729)**	**61,454**	**428,261**	**1,479,268**	**-**	**-**	**1,839,254**
Derivative financial assets	-	10,246,576	14,094,606	12,174,323	12,130,335	530,159	-	49,175,999
Derivative financial liabilities	-	10,376,305	14,033,152	11,746,062	10,651,067	530,159	-	47,336,745
Non-cash loans	**298,637**	**917,786**	**1,462,947**	**4,263,430**	**1,115,833**	**828,836**	**-**	**8,887,469**

(*) 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, stationery, prepaid expenses, expected loss provisions for non-credit financial assets and equity securities.
(**) Unallocated column in other liabilities mainly consists of provisions, unallocated part of taxes payable and shareholders' equity.

5. Breakdown of liabilities according to their remaining contractual maturities

The 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	Carrying value
Liabilities									
Deposits	6,950,912	30,398,238	1,566,877	240,854	1,186	-	39,158,067	(188,341)	38,969,726
Funds borrowed from other financial institutions	-	334,241	837,631	3,571,433	8,259,369	2,356,919	15,359,593	(264,551)	15,095,042
Funds from interbank money market	-	14,232	-	-	82,601	-	96,833	(4)	96,829
Securities issued	-	-	-	-	-	-	-	-	-
Factoring payables	-	1,501	812	-	-	-	2,313	-	2,313

Prior period	Demand	Up to 1 month	1-3 months	3-12 months	1-5 years	5 years and over	Total	Adjustments	Carrying value
Liabilities									
Deposits	5,741,495	24,503,773	1,652,417	484,107	242	-	32,382,034	(104,597)	32,277,437
Funds borrowed from other financial institutions	-	203,893	1,724,176	6,387,949	12,284,602	5,079,915	25,680,535	(499,639)	25,180,896
Funds from interbank money market	-	2,188	-	-	-	20,428	22,616	-	22,616
Securities issued	-	-	-	-	-	-	-	-	-
Factoring payables	-	560	55	31	-	-	646	-	646

VI. Explanations on consolidated liquidity risk management and liquidity coverage ratio (continued)

6. 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)	**-**	**-**	**-**	**-**	**-**	**-**
Buying transactions	-	-	-	-	-	-
Selling transactions	-	-	-	-	-	-
Transactions for cash flow hedge (II)	**43,289**	**1,257,882**	**2,597,504**	**4,729,007**	**739,794**	**9,367,476**
Buying transactions	40,560	647,012	1,176,778	2,271,466	344,142	4,479,958
Selling transactions	2,729	610,870	1,420,726	2,457,541	395,652	4,887,518
Transactions for foreign net investment hedge (III)	**-**	**-**	**-**	**-**	**-**	**-**
Buying transactions	-	-	-	-	-	-
Selling transactions	-	-	-	-	-	-
A. Total derivative financial instruments held for hedging (I+II+III)	**43,289**	**1,257,882**	**2,597,504**	**4,729,007**	**739,794**	**9,367,476**
Derivative transactions held for trading						
Trading transactions (I)	**27,958,159**	**9,027,637**	**11,580,627**	**7,613,267**	**-**	**56,179,690**
Forward foreign currency transactions – buy	1,225,880	1,209,021	1,779,093	103,948	-	4,317,942
Forward foreign currency transactions – sell	1,217,809	1,195,191	1,772,070	134,844	-	4,319,914
Swap transactions- buy	10,883,710	3,152,336	4,118,813	4,371,119	-	22,525,978
Swap transactions – sell	10,940,506	2,957,859	3,880,045	3,003,356	-	20,781,766
Foreign currency options – buy	1,825,203	252,602	15,173	-	-	2,092,978
Foreign currency options – sell	1,865,051	260,628	15,433	-	-	2,141,112
Foreign currency futures – buy	-	-	-	-	-	-
Foreign currency futures – sell	-	-	-	-	-	-
Interest rate derivatives (II)	**3,646,151**	**5,067,727**	**13,778,423**	**11,128,342**	**568,998**	**34,189,641**
Interest rate swap - buy	1,875,314	2,566,186	6,936,607	5,537,099	273,926	17,189,132
Interest rate swap - sell	1,770,837	2,501,541	6,841,816	5,591,243	295,072	17,000,509
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)	**31,604,310**	**14,095,364**	**25,359,050**	**18,741,609**	**568,998**	**90,369,331**
Derivative transaction total (A+B)	**31,647,599**	**15,353,246**	**27,956,554**	**23,470,616**	**1,308,792**	**99,736,807**

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)	**1,543,800**	**2,106,396**	**11,923,291**	**16,091,268**	**1,382,875**	**33,047,630**
Buying transactions	858,019	1,261,672	6,217,391	8,566,341	645,306	17,548,729
Selling transactions	685,781	844,724	5,705,900	7,524,927	737,569	15,498,901
Transactions for foreign net investment hedge (III)	**-**	**-**	**-**	**-**	**-**	**-**
Buying transactions	-	-	-	-	-	-
Selling transactions	-	-	-	-	-	-
A. Total derivative financial instruments held for hedging (I+II+III)	**1,543,800**	**2,106,396**	**11,923,291**	**16,091,268**	**1,382,875**	**33,047,630**
Derivative transactions held for trading						
Trading transactions (I)	**18,816,280**	**25,266,544**	**13,020,500**	**2,710,799**	**-**	**59,814,123**
Forward foreign currency transactions – buy	1,499,128	3,639,760	1,992,154	71,607	-	7,202,649
Forward foreign currency transactions – sell	1,453,596	3,583,350	1,870,979	59,902	-	6,967,827
Swap transactions- buy	7,181,438	8,764,074	4,325,756	1,284,820	-	21,556,088
Swap transactions – sell	7,420,323	9,048,544	4,433,702	1,294,470	-	22,197,039
Foreign currency options – buy	625,678	115,053	198,796	-	-	939,527
Foreign currency options – sell	636,117	115,763	199,113	-	-	950,993
Foreign currency futures – buy	-	-	-	-	-	-
Foreign currency futures – sell	-	-	-	-	-	-
Interest rate derivatives (II)	**667,000**	**1,529,287**	**1,824,097**	**6,594,540**	**36,519**	**10,651,443**
Interest rate swap - buy	334,099	769,152	918,357	3,299,023	18,291	5,338,922
Interest rate swap - sell	332,901	760,135	905,740	3,295,517	18,228	5,312,521
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)	**33,366**	**-**	**-**	**-**	**-**	**33,366**
B. Total derivative transactions held for trading (I+II+III)	**19,516,646**	**26,795,831**	**14,844,597**	**9,305,339**	**36,519**	**70,498,932**
Derivative transaction total (A+B)	**21,060,446**	**28,902,227**	**26,767,888**	**25,396,607**	**1,419,394**	**103,546,562**

VII. Explanations on consolidated leverage ratio

Leverage ratio table prepared in accordance with the communique "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 2019, the Group's consolidated leverage ratio calculated by taking average of end of month leverage ratios for the last three-month is 9.61% (31 December 2018: 7.93%). This ratio is above the minimum ratio. The capital increased by 23% mainly as a result of increase in net profits. Therefore, the current period leverage ratio increased by 168 basis points compared to prior period.

	Current period (**)	Prior period (**)
Total assets in the consolidated financial statements prepared in accordance with TAS (*)	116,633,385	118,161,673
The difference between total amount of asset in the consolidated financial statements prepared in accordance with TAS and the communiqué on preparation of consolidated financial statements of banks	111,992	(96,031)
The difference between total amount and total risk amount of derivative financial instruments with credit derivative in the communiqué on preparation of consolidated financial statements of banks	(28,012,348)	(30,616,499)
The difference between total amount and total risk amount of risk investment securities or commodity collateral financing transactions in the communiqué on preparation of consolidated financial statements of banks	469,851	145,863
The difference between total amount and total risk amount of off-balance sheet transactions in the communiqué on preparation of consolidated financial statements of banks	-	-
The other differences between amount of assets and risk in the communiqué on preparation of consolidated financial statements of banks	(83,802)	(56,792)
Total exposures	**89,119,078**	**87,538,214**

(*) Consolidated financial statements are prepared based on Article No 5 of Clause No 6 in the Communiqué on Preparation of Consolidated Financial Statements of Banks.
(**) The amounts in the table represents the average of last three months.

Explanations on leverage ratio

	Current period (*)	Prior period (*)
On-balance sheet items		
On-balance sheet exposures (excluding derivatives and credit derivatives including collateral)	*63,813,463*	*67,107,641*
Asset deducted from core capital	*(83,802)*	*(56,792)*
The total amount of risk on-balance sheet exposures	63,729,661	67,050,849
Derivative financial instruments and credit derivative exposures		
Replacement cost associated with derivative financial instruments and credit derivatives	*2,677,428*	*4,396,164*
The potential credit risk amount of derivative financial instruments and credit derivatives	*3,216,995*	*606,490*
The total risk amount of derivative financial instruments and credit derivatives	5,894,423	5,002,654
Securities or commodity guaranteed financing transactions		
Risk amount of securities or commodity collateral financing transactions (excluding on balance sheet items)	*469,851*	*145,863*
Risk amount of exchange brokerage operations	-	-
The total risk amount of securities or commodity collateral financing transactions	469,851	145,863
Off-balance sheet items		
Gross notional amount for off-balance sheet items	*19,025,143*	*15,338,848*
Adjustments for conversion to credit equivalent amounts	-	-
The total amount of risk for off-balance sheet items	19,025,143	15,338,848
Capital and total exposures		
Core capital	8,552,846	6,932,004
Total exposures	89,119,078	87,538,214
Leverage ratio		
Leverage ratio	9.61	7.93

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

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 reprising 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 reprising 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	**53,684,191**	**54,730,613**	**54,571,981**	**52,993,956**
Money market placements	8,256,577	8,254,545	4,360,089	4,359,736
Due from banks	1,156,077	1,155,812	1,149,179	1,153,779
Financial assets at fair value through other comprehensive income	1,340,590	1,340,590	648,083	648,083
Financial assets measured at amortised cost	2,114,299	2,268,208	1,194,996	1,192,821
Loans	39,575,065	40,411,209	45,349,511	43,762,469
Factoring receivables	388,517	401,249	755,516	761,785
Leasing receivables	853,066	899,000	1,114,607	1,115,283
Financial liabilities	**54,986,477**	**53,708,714**	**58,059,832**	**56,759,849**
Bank deposits	2,125,314	2,124,107	2,291,934	2,291,209
Other deposits	36,844,412	35,491,063	29,985,503	28,611,540
Funds borrowed	15,095,042	15,172,242	25,180,896	25,255,707
Money market borrowings	96,829	96,422	22,616	22,510
Securities issued	-	-	-	-
Miscellaneous payables	523,788	523,788	578,237	578,237
Liabilities from leasing transactions	298,779	298,779	-	-
Factoring payables	2,313	2,313	646	646

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

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 Group carried at fair value in financial statements as of 31 December 2019 and 31 December 2018 is presented in the table below:

Current period	Level 1	Level 2	Level 3	Total
Total assets	**1,451,924**	**2,691,937**	**11,390**	**4,155,251**
Financial assets at fair value through profit or loss	122,724	2,655,504	-	2,778,228
Government debt securities	122,689	-	-	122,689
Trading derivative financial assets	-	2,655,504	-	2,655,504
Equity instruments	35	-	-	35
Other marketable securities	-	-	-	-
Financial assets at fair value through other comprehensive income	1,329,200	-	11,390	1,340,590
Equity instruments	-		11,390	11,390
Government debt securities	1,329,200	-	-	1,329,200
Hedging derivative financial assets	-	36,433	-	36,433
Cash flow hedges	-	36,433	-	36,433
Total liabilities	**-**	**982,376**	**-**	**982,376**
Trading derivative financial liabilities	-	626,998	-	626,998
Hedging derivative financial liabilities	-	355,378	-	355,378
Cash flow hedges	-	355,378	-	355,378

Prior period	Level 1	Level 2	Level 3	Total
Total assets	**668,573**	**3,535,273**	**8,286**	**4,212,132**
Financial assets at fair value through profit or loss	28,776	566,362	-	595,138
Government debt securities	28,728	-	-	28,728
Trading derivative financial assets	-	566,362	-	566,362
Equity instruments	35	-	-	35
Other marketable securities	13	-	-	13
Financial assets at fair value through other comprehensive income	639,797	-	8,286	648,083
Equity instruments	-	-	8,286	8,286
Government debt securities	639,797	-	-	639,797
Hedging derivative financial assets	-	2,968,911	-	2,968,911
Cash flow hedges	-	2,968,911	-	2,968,911
Total liabilities	**-**	**1,111,762**	**-**	**1,111,762**
Trading derivative financial liabilities	-	848,356	-	848,356
Hedging derivative financial liabilities	-	263,406	-	263,406
Cash flow hedges	-	263,406	-	263,406

There are no transfers between the 1st and the 2nd levels as of 31 December 2019 and 31 December 2018.

The movement table of financial assets at Level 3 is presented below.

	Current period	Prior period
Balance at the end of the prior period	8,286	8,009
Purchases	2,939	-
Redemption / sale	-	-
Valuation difference	165	277
Transfers	-	-
Balance at the end of the current period	**11,390**	**8,286**

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

The Group 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 Group has no trust transactions.

X. Explanations on consolidated 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 Parent Bank, tables required by Internal Rating Based approach ("IRB") are not presented.

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

a. Group's risk management approach

The Parent 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 Parent Bank is based on three lines of defence model.

1. 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.

2. 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. The Parent Bank's Risk Management consists of Financial Risk Management, Operational and Information Risk Management, Compliance departments and reports to the Audit Committee. Financial Risk Management includes Market Risk Management and Product Control, Credit Risk Control, Validation, Risk&Capital Integration and Reporting departments.

3. Line of defence

Internal Audit Department is the third line of defence. Internal Audit Department carries out both risk 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.

X. Explanations on consolidated risk management (continued)

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 Parent 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 Parent Bank's regulatory limits is breached. The Parent 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 Parent 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 Parent Bank. Accordingly, the Parent Bank performs the stress test together with all relevant units in a consolidated manner.

Detailed explanations on the Parent 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".

b. Overview of risk weighted amounts

	Risk weighted amount		Minimum capital requirement
	Current period	**Previous period**	**Current period**
Credit risk (excluding counterparty credit risk) (CCR)	**41,851,196**	**45,836,154**	**3,348,096**
Standardized approach (SA)	41,851,196	45,836,154	3,348,096
Internal rating-based (IRB) approach	-	-	-
Counterparty credit risk	**1,927,209**	**2,920,260**	**154,177**
Standardized approach for counterparty credit risk (SA-CCR)	1,927,209	2,920,260	154,177
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	**213,788**	**383,425**	**17,103**
Standardized approach (SA)	213,788	383,425	17,103
Internal model approaches (IMM)	-	-	-
Operational risk	**6,022,402**	**4,792,696**	**481,792**
Basic indicator approach	6,022,402	4,792,696	481,792
Standard approach	-	-	-
Advanced measurement approach	-	-	-
The amount of the discount threshold under the equity (subject to a 250% risk weight)	-	-	-
Floor adjustment	-	-	-
Total	**50,014,595**	**53,932,535**	**4,001,168**

X. Explanations on consolidated risk management (continued)

2. Linkages between financial statements and risk amounts

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

			Revalued amount in accordance with TAS				
Assets	**Revalued amount in accordance with TAS as reported in published financial statements**	**Revalued amount in accordance with TAS under scope of regulatory consolidation**	**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**
Cash and balances with Central Bank	7,427,556	7,427,556	7,427,556	-	-	-	-
Financial assets at fair value through profit and loss	2,778,228	2,700,508	-	2,655,504	-	2,778,228	-
Banks	1,156,077	1,156,077	1,156,077	-	-	-	-
Money market placements	8,256,577	8,256,577	39,010	8,217,567	-	-	-
Financial assets measured at fair value through other comprehensive income	1,340,590	1,339,551	1,340,590	-	-	-	-
Financial assets measured at amortised cost	2,114,571	2,114,571	2,114,571	-	-	-	-
Expected credit losses (-)	8,843	-	-	-	-	-	8,843
Loans (Net)	40,816,376	41,595,161	41,202,877	-	-	-	(381,107)
Loans	38,583,909	39,365,249	38,583,909	-	-	-	5,395
Lease receivables	853,066	853,066	853,066	-	-	-	-
Factoring receivables	388,517	388,517	388,517	-	-	-	-
Non performing receivables	2,973,616	2,973,616	2,973,616	-	-	-	-
Expected credit losses (-)	1,982,732	1,985,287	1,596,231	-	-	-	386,502
Associates (net)	-	-	-	-	-	-	-
Subsidiaries (net)	-	-	-	-	-	-	-
Joint ventures (net)	-	-	-	-	-	-	-
Derivative financial assets held for hedging	36,433	32,515	-	36,433	-	-	-
Tangible assets (net)	946,978	1,286,764	891,904	-	-	-	55,075
Intangible assets (net)	55,171	55,171	-	-	-	-	55,155
Investment property (net)	-	-	-	-	-	-	-
Tax asset	47	889	47	-	-	-	-
Property and equipment held for sale and related to discontinued operations (net)	660	660	660	-	-	-	-
Other assets	513,393	519,344	513,393	-	-	-	-
Total assets	**65,433,814**	**66,485,344**	**54,686,685**	**10,909,504**	**-**	**2,778,228**	**(279,720)**
Liabilities							
Deposit	38,969,726	38,969,726	-	-	-	-	38,969,726
Derivative financial liabilities at fair value through profit or loss	626,998	632,416	-	-	-	-	626,998
Loans received	10,857,644	11,638,983	-	-	-	-	10,857,691
Money market funds	96,829	14,228	-	96,829	-	-	-
Securities issued	-	-	-	-	-	-	-
Funds	-	-	-	-	-	-	-
Factoring payables	2,313	2,313	-	-	-	-	2,313
Lease payables	298,779	298,779	-	-	-	-	298,779
Derivative financial liabilities at fair value through other comprehensive income	355,378	355,500	-	-	-	-	355,378
Provisions	225,640	197,218	32,363	-	-	-	157,883
Tax liability	325,134	361,156	-	-	-	-	325,134
Liabilities for assets held for sale and assets of discontinued operations (net)	-	-	-	-	-	-	-
Subordinated debt	4,237,398	4,237,398	-	-	-	-	4,237,398
Other liabilities	899,434	889,167	-	-	-	-	-
Shareholders' equity	8,538,541	8,888,460	-	-	-	-	8,529,790
Total liabilities	**65,433,814**	**66,485,344**	**32,363**	**96,829**	**-**	**-**	**64,361,090**

X. Explanations on consolidated risk management (continued)

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

	Total	Subject to credit risk	Securitization positions	Subject to counterparty credit risk	Subject to market risk (*)
Assets carrying value in accordance with TAS	**65,713,534**	**54,686,685**	**-**	**10,909,504**	**2,778,228**
Liabilities carrying value in accordance with TAS under scope of regulatory consolidation	1,072,724	32,363	-	96,829	-
Total net amount under scope of regulatory consolidation	**64,640,810**	**54,654,322**	**-**	**10,812,675**	**2,778,228**
Off-balance sheet amount	16,648,607	5,400,017	-	498,837	-
Differences due to risk mitigation	-	(314,542)	-	(7,676,258)	-
Differences due to different netting rules	-	-	-	-	-
Differences due to consideration of provisions	-	-	-	-	-
Differences due to the applications of the Parent Bank	-	-	-	-	(2,564,440)
Exposure amounts	**-**	**59,739,797**	**-**	**3,635,254**	**213,788**

(*) 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", are represented in "Subject to market risk framework" column are presented.

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

The Parent Bank's Credit Risk Management reports to the Audit Committee. In order to carry out its functions and responsibilities more effectively, Credit Risk Management is structured as Credit Risk Control and Risk&Capital Integration and Reporting Department. Credit Risk Control team is responsible for developing, monitoring and sustaining the models to be used in Internal Ratings Based Method and TFRS 9 calculations and the integration of rating models in the bank systems. Also management of QRM system which is a credit portfolio corporate risk management solution allowing bank based risk management, IRB calculations and reporting are other responsibilities. Risk&Capital Integration is responsible to form ICAAP process to carry out stress testing and reporting.

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

Risk appetite is determined according to the risk identification and assessment results, the risk capacity formed by the Parent 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 Audit Committee and presented by the Audit Committee to the Board of Directors. The approval authority for risk appetite structure and indicators is the Board of Directors.

X. Explanations on consolidated risk management (continued)

The Parent 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

	Gross carrying values of (according to TAS)			
	Defaulted	**Non-defaulted**	**Provisions / amortization and impairment**	**Net values**
Loans	2,973,616	39,825,492	1,982,460	40,816,648
Debt securities (*)	-	3,443,771	9,023	3,434,748
Off-balance sheet exposures	126,612	16,554,358	67,756	16,613,214
Total	**3,100,228**	**59,823,621**	**2,059,239**	**60,864,610**

(*) 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	2,088,790	1,705,141
Loans and debt securities defaulted since the last reporting period	1,840,293	1,555,983
Transferred to non-defaulted status	-	-
Amounts written off (*)	(161,877)	(550,759)
Other changes (**)	(793,590)	(621,575)
Defaulted loans and debt securities at the end of the reporting period	**2,973,616**	**2,088,790**

(*) Specific provisions for undrawn non-cash loans are not included in the table. Amounts written off also includes the NPL sale of the Parent Bank amounting to TL 149,567 (31 December 2018: TL 533,027).

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

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.

X. Explanations on consolidated risk management (continued)

Definitions of the restructured receivables:

The Parent 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 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

	Non-performing loans (**)	Specific provision
Domestic	2,970,184	1,592,875
EU Countries	3,260	3,222
OECD Countries (*)	-	-
Off-Shore Banking Regions	-	-
USA, Canada	-	-
Other countries	172	134
Total	**2,973,616**	**1,596,231**

(*) 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

	Previously	Current period
Due 31 – 60	294,350	554,476
Due 61 – 90	115,937	267,993
Total	**410,287**	**822,469**

Breakdown of restructured receivables by whether or not provisions are allocated

	Previously	Current period
Loans structured from standard loans and other receivables	-	-
Loans structured from closely monitored loans and other receivables	1,071,845	689,761
Loans restructured from non-performing loans	23,986	5,451

Group 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.

X. Explanations on consolidated risk management (continued)

Information on expected credit loss

	Stage 1	Stage 2	Stage 3	Total
Opening balance (*)	**209,665**	**412,916**	**1,093,143**	**1,715,724**
Additional provision during the period	35,261	24,760	632,821	692,842
Disposals (-)	(14,466)	(79,470)	(484,648)	(578,584)
Amounts written off (-)	-	-	(149,567)	(149,567)
Transferred to Stage 1	15,626	(82,679)	-	(67,053)
Transferred to Stage 2	(13,202)	165,913	-	152,711
Transferred to Stage 3	-	(228,334)	536,845	308,511
Ending balance	**232,884**	**213,106**	**1,628,594**	**2,074,584**

(*) 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 Group 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 Group are divided into two groups as financial collaterals and guarantees. Collaterals are considered as allowed by the related regulations.

If credit assignment is conditioned to a collateral extension, the data of the collaterals must be entered to the banking information system. Collaterals are entered in the main banking application Finsoft through branches. Collaterals are activated after the Credit Operation Centre ("KROM") teams' check and approval of the collateral entries.

The Group monitors up to date value of the collaterals by type. As a general principle, the Parent 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 Group makes the assessment according to the latest expert value in the real estate guarantees taken as a real property.

The Group'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 Parent 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.

X. Explanations on consolidated risk management (continued)

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
Loans (*)	33,653,659	7,162,989	5,930,025	3,171,846	2,768,696	-	-
Debt securities (*)	3,434,748	-	-	-	-	-	-
Total	**37,088,407**	**7,162,989**	**5,930,025**	**3,171,846**	**2,768,696**	**-**	**-**
Of which defaulted	2,973,616	-	-	-	-	-	-

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

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 techniques

	Exposures before CCF and CRM		Exposures post-CCF and CRM		RWA and RWA density	
Risk classes	**On-balance sheet amount**	**Off-balance sheet amount**	**On-balance sheet amount**	**Off-balance sheet amount**	**RWA**	**RWA density**
Claims on sovereigns and Central Banks	9,617,306	-	12,386,002	-	2,053,172	16.58%
Claims on regional governments or local authorities	1,096,530	-	1,019,826	-	568,303	55.73%
Claims on administrative bodies and other non-commercial undertakings	-	-	-	-	-	-
Claims on multilateral development banks	-	-	-	-	-	-
Claims on international organizations	-	-	-	-	-	-
Claims on banks and intermediary institutions	14,209,966	6,539,805	5,924,815	1,348,657	2,874,662	39.52%
Claims on corporates	20,672,021	6,843,035	19,299,814	3,761,203	22,527,868	97.69%
Claims on retails	13,956,885	3,615,634	12,392,134	597,967	9,728,507	74.89%
Claims secured by residential property	1,038,036	20,281	1,038,036	6,680	370,060	35.42%
Claims secured by commercial property	1,487,318	104,101	1,487,318	57,471	868,216	56.20%
Past due loans	253,061	-	253,061	-	257,439	101.73%
Higher risk categories decided by the Board	1,124,324	-	1,124,324	-	1,178,611	104.83%
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	2,661,435	24,594	2,661,435	4,919	1,412,967	52.99%
Equity securities	11,391	-	11,391	-	11,391	100.00%
Total	**66,128,273**	**17,147,450**	**57,598,156**	**5,776,897**	**41,851,196**	**66.04%**

X. Explanations on consolidated risk management (continued)

d. Standard approach exposures by asset classes and risk weights

Risk classes	0%	10%	20%	35%	50%	75%	100%	150%	200%	Others	Total credit exposures amount (post CCF and post-CRM)
Claims on sovereigns and Central Banks	10,332,829	-	-	-	-	-	2,053,173	-	-	-	12,386,002
Claims on regional governments or local authorities	1	-	-	-	903,048	-	116,777	-	-	-	1,019,826
Claims on administrative bodies and other non-commercial undertakings	-	-	-	-	-	-	-	-	-	-	-
Claims on multilateral development banks	-	-	-	-	-	-	-	-	-	-	-
Claims on international organizations	-	-	-	-	-	-	-	-	-	-	-
Claims on banks and intermediary institutions	-	-	2,383,437	-	2,421,132	-	2,433,935	34,968	-	-	7,273,472
Claims on corporates	2	-	251	-	201,508	-	22,859,256	-	-	-	23,061,017
Claims on retails	-	-	-	-	-	12,990,101	-	-	-	-	12,990,101
Claims secured by residential property	-	-	-	1,037,933	-	-	6,783	-	-	-	1,044,716
Claims secured by commercial property	-	-	-	-	1,353,149	-	191,640	-	-	-	1,544,789
Past due loans	-	-	-	-	12,785	-	218,721	21,555	-	-	253,061
Higher risk categories decided by the Board	-	-	-	-	239,106	-	537,539	347,679	-	-	1,124,324
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	1,253,381	-	-	-	-	-	1,412,973	-	-	-	2,666,354
Equity securities	-	-	-	-	-	-	11,391	-	-	-	11,391
Total	**11,586,213**	**-**	**2,383,688**	**1,037,933**	**5,130,728**	**12,990,101**	**29,842,188**	**404,202**	**-**	**-**	**63,375,053**

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.

X. Explanations on consolidated risk management (continued)

b. Counterparty credit risk (CCR) approach analysis

	Replacement cost	Potential future exposure	EEPE (*)	Alpha used for computing regulatory EAD	Exposure after CRM	RWA
Standardised Approach - CCR (for derivatives)	2,691,936	498,841	-	1.40	3,190,777	1,656,234
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)	-	-	-	-	444,477	89,013
Value-at-Risk (VaR) for repo transactions, securities or commodity lending or borrowing transactions, long settlement transactions and securities financing transactions	-	-	-	-	-	-
Total						**1,745,247**

(*) Effective expected positive exposure

c. Credit valuation adjustment (CVA) for capital charge

	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	3,190,777	181,962
Total subject to the CVA capital charge	3,190,777	181,962

ç. Analysis of counterparty credit risk (CCR) exposure

Asset classes/Risk weight	0%	10%	20%	50%	75%	100%	150%	Others	Total credit exposure (*)
Claims on sovereigns and Central Banks	-	-	-	-	-	-	-	-	-
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	-	-	991,041	2,184,594	-	8,477	-	-	3,184,112
Claims on corporates	-	-	236	-	-	432,148	-	-	432,384
Claims included in the regulatory retail portfolios	-	-	-	-	18,758	-	-	-	18,758
Claims secured by residential property	-	-	-	-	-	-	-	-	-
Past due loans	-	-	-	-	-	-	-	-	-
Higher risk categories decided by the Board	-	-	-	-	-	-	-	-	-
Secured by mortgages	-	-	-	-	-	-	-	-	-
Securitization positions	-	-	-	-	-	-	-	-	-
Short-term claims and short-term corporate claims on banks and intermediary institutions	-	-	-	-	-	-	-	-	-
Undertakings for collective investments in mutual funds	-	-	-	-	-	-	-	-	-
Stock investment	-	-	-	-	-	-	-	-	-
Other receivables	-	-	-	-	-	-	-	-	-
Other assets (**)	-	-	-	-	-	-	-	-	-
Total	**-**	**-**	**991,277**	**2,184,594**	**18,758**	**440,625**	**-**	**-**	**3,635,254**

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

X. Explanations on consolidated risk management (continued)

e. Credit derivatives

There is no credit derivative transaction.

5. Securitization

There is no securitization transaction.

6. Explanations on market risk

The Parent 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.

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

Risk management strategies and policies are updated regarding to regulations stated above and approved by Board of Director's. In relation to the regulatory capital requirements, on a consolidated and unconsolidated basis, standard method is used in measuring 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 within the scope of ICAAP to complement the risk analysis. In addition, compliance on ING Group's policies related to market risk, especially for the international regulations (ILAAP - Internal Liquidity adequacy Assessment Process) was reviewed regularly, all these analysis are reflected in the relevant written procedures and policies. Due to the increase in the regulatory regulations and the need for pursuing more sophisticated risk management in recent years, the project of a software has been launched to manage risks related to asset liability management in a more integrated structure and currently enhancements are in progress.

	RWA
Outright products	213,788
Interest rate risk (general and specific)	146,113
Equity risk (general and specific)	-
Foreign exchange risk	67,675
Commodity risk	-
Options	
Simplified approach	-
Delta-plus method	-
Scenario approach	-
Securitisation	-
Total	**213,788**

X. Explanations on consolidated 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 2019 is calculated by using the gross income of the Parent Bank in 2016, 2017 and 2018.

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	2016 amount	2017 amount	2018 amount	Total / Number of years of positive gross income	Ratio (%)	Total
Gross income	2,605,243	2,995,349	4,035,249	3,211,947	15	481,792
Amount subject to operational risk (Amount*12.5)						**6,022,402**

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, Audit 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	818,044	6.57%
TL	(+) 500	(894,213)	(7.18)%
EURO	(-) 200	(9,239)	(0.07)%
EURO	(+) 200	(63,779)	(0.51)%
USD	(-) 200	47,861	0.38%
USD	(+) 200	(50,674)	(0.41)%
Total (for negative shocks)		**856,666**	**6.88%**
Total (for positive shocks)		**(1,008,666)**	**(8.10)%**

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	7,285,819	36,433	355,378	19,825,586	519,311	263,406
Cross currency swaps	-	-	-	6,893,889	2,449,600	-
Total	**7,285,819**	**36,433**	**355,378**	**26,719,475**	**2,968,911**	**263,406**

Explanations on derivative transactions used in cash flow hedges

Current period

Hedging instrument	Hedged item	Nature of risk hedged	Hedging instrument FV Assets	Hedging instrument FV Liabilities	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)
Interest rate swaps	TL/FC customer deposits	Cash flow risk due to the changes in the interest rates of TL and FC customer deposits	9,043	355,378	(708,869)	49,675	21,119
Interest rate swaps	TL revolving loans	Cash flow risk due to the changes in the interest rates of TL revolving loans	27,390	-	(42,988)	4,959	-
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	-	-	(214,877)	1,094	-
Total			**36,433**	**355,378**	**(966,734)**	**55,728**	**21,119**

Prior period

Hedging instrument	Hedged item	Nature of risk hedged	Hedging instrument FV Assets	Hedging instrument FV Liabilities	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)
Interest rate swaps	TL customer deposits	Cash flow risk due to the changes in the interest rates of customer deposits	519,311	263,406	294,768	9,555	(8,075)
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	2,449,600	-	153,133	3,792	-
Total			**2,968,911**	**263,406**	**447,901**	**13,347**	**(8,075)**

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 Note VI of Section Four.

XII. Explanations on segment reporting

The Group operates mainly in corporate, SME, commercial and retail banking services. In scope of corporate, SME and commercial 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 Parent Bank's Management Reporting System.

Current period – 31 December 2019	Corporate, SME and Commercial Banking	Retail Banking	Other	Total
Net interest income	1,499,663	1,502,986	459,829	3,462,478
Net commissions and fees income and other operating income	532,371	442,299	117,801	1,092,471
Trading gain/loss	97,248	46,661	461,921	605,830
Dividend income	-	-	3,115	3,115
Provision for impairment of loans and other receivables	(896,111)	(314,129)	(7,003)	(1,217,243)
Segment results	1,233,171	1,677,817	1,035,663	3,946,651
Other operating expenses (**)				(1,970,721)
Income from continuing operations before tax				1,975,930
Tax provision (*)				(434,064)
Net profit				**1,541,866**

Prior period – 31 December 2018	Corporate, SME and Commercial Banking	Retail Banking	Other	Total
Net interest income	1,504,092	1,160,071	996,941	3,661,104
Net commissions and fees income and other operating income	707,197	335,340	95,208	1,137,745
Trading gain/loss	315,879	55,582	(549,088)	(177,627)
Dividend income	-	-	167	167
Provision for impairment of loans and other receivables	(906,020)	(378,893)	(1,641)	(1,286,554)
Segment results	1,621,148	1,172,100	541,587	3,334,835
Other operating expenses (**)				(1,880,529)
Income from continuing operations before tax				1,454,306
Tax provision (*)				(313,672)
Net profit				**1,140,634**

(*) 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.

Current period – 31 December 2019	Corporate, SME and Commercial Banking	Retail Banking	Other	Total
Asset	31,590,192	11,631,450	22,212,172	65,433,814
Liability	18,623,619	28,957,843	9,313,811	56,895,273
Equity	-	-	8,538,541	8,538,541

Prior period – 31 December 2018	Corporate, SME and Commercial Banking	Retail Banking	Other	Total
Asset	37,967,387	11,908,013	18,536,682	68,412,082
Liability	18,656,612	23,402,180	18,695,678	60,754,470
Equity	-	-	7,657,612	7,657,612

Section five

Information and disclosures related to consolidated financial statements

I. Explanations and notes related to assets of the consolidated 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	305,785	947,588	291,079	1,349,622
Balances with the Central Bank of Turkey	344,422	5,829,761	407,796	6,861,366
Other	-	-	-	374
Total	**650,207**	**6,777,349**	**698,875**	**8,211,362**

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

	Current period		Prior period	
	TL	**FC**	**TL**	**FC**
Unrestricted demand deposit	344,422	1,465,328	407,796	1,850,723
Restricted time deposit	-	1,336,860	-	2,281,923
Reserve requirement	-	3,027,573	-	2,728,720
Total	**344,422**	**5,829,761**	**407,796**	**6,861,366**

As per the "Communiqué on Reserve Requirements" promulgated by the Central Bank, banks operating in Turkey must keep required reserves as of the balance sheet date in terms of TL, USD / EURO and gold at a rate ranging between 1% and 7% for Turkish lira deposits and liabilities depending on their maturity and at a rate ranging between 5% and 21% for foreign currency deposits and foreign currency other liabilities depending on their maturity.

The Central Bank of Turkey pays interest to banks that provide credit growth in accordance with the communique principles dated 9 December 2019 and numbered 2019/19, for Turkish Lira required reserves.

TL 344,181 (31 December 2018: TL 406,495) of the TL reserve deposits provided over the average balance and TL 1,465,328 (31 December 2018: TL 1,850,723) of the FC reserve deposits provided over the average balance are presented under unrestricted demand deposit account.

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

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 or loss subject to repo transactions and those given as collateral / blocked are stated below in net amount.

	Current period	Prior period
Unrestricted portfolio	52,090	21,385
Collateral / blocked	70,634	7,391
Total	**122,724**	**28,776**

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

	Current period		Prior period	
	TL	FC	TL	FC
Forward transactions	-	71,372	52	232,495
Swap transactions	2,467,192	114,566	247,509	82,713
Futures transactions	-	-	-	-
Options	134	2,240	155	3,438
Other	-	-	-	-
Total	**2,467,326**	**188,178**	**247,716**	**318,646**

3. Information on banks and foreign banks accounts

3.1. Information on banks

	Current period		Prior period	
	TL	FC	TL	YP
Banks	13,802	1,142,275	81,826	1,067,353
Domestic	13,801	173,601	81,826	490,624
Foreign	1	968,674	-	576,729
Headquarters and branches abroad	-	-	-	-
Total	**13,802**	**1,142,275**	**81,826**	**1,067,353**

3.2. Information on foreign banks

	Unrestricted amount		Restricted amount	
	Current period	Prior period	Current period	Prior period
EU countries	397,794	201,513	406,420	232,219
USA, Canada	23,226	29,202	396	-
OECD Countries (*)	139,304	4,863	-	-
Off-shore banking regions	-	-	-	-
Other	1,535	108,932	-	-
Total	**561,859**	**344,510**	**406,816**	**232,219**

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

As of 31 December 2019, restricted bank balance amounting to TL 406,816 (31 December 2018: TL 232,219) all of which is comprised of (31 December 2018: all amount) collaterals that is held by counter banks under CSA contracts and is calculated based on related derivatives market price.

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

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	1,326,372	645,917
Repo transactions	14,218	2,166
Collateral / blocked (*)	-	-
Total	**1,340,590**	**648,083**

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

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	1,329,581	658,605
Quoted to stock exchange	1,329,581	658,605
Not quoted	-	-
Equity certificates	11,390	8,286
Quoted to stock exchange	-	-
Not quoted	11,390	8,286
Provision for impairment (-)	(381)	(18,808)
Total	**1,340,590**	**648,083**

5. Information on loans

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

	Current period		Prior period	
	Cash	Non-cash	Cash	Non-cash
Direct loans granted to shareholders of the Parent Bank	120	569,874	71	570,374
Corporate shareholders	-	569,874	-	570,374
Real person shareholders	120	-	71	-
Indirect loans granted to shareholders of the Parent Bank	39	201,879	47	200,958
Loans granted to employees of the Parent Bank	32,606	-	29,302	-
Total	**32,765**	**771,753**	**29,420**	**771,332**

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

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

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	34,163,603	3,348,461	1,071,845	-
Business loans	15,906,388	1,758,490	604,541	-
Export loans	5,311,611	423,728	55,405	-
Import loans	-	-	-	-
Loans given to financial sector	1,900,062	200,881	-	-
Consumer loans	9,169,060	835,218	368,574	-
Credit cards	599,428	92,770	43,325	-
Other	1,277,054	37,374	-	-
Specialized loans	-	-	-	-
Other receivables	-	-	-	-
Total	**34,163,603**	**3,348,461**	**1,071,845**	**-**

	Current period		Prior period	
	Standard loans	Loans and other receivables under close monitoring	Standard loans	Loans and other receivables under close monitoring
12 Month Expected Credit Losses	199,332	6	180,771	-
Loans	*183,722*	-	*165,450*	-
Other assets	*6,495*	6	*7,367*	-
Banks and money market placements	*8,843*	-	*7,801*	-
Marketable securities	*272*	-	*153*	-
Lifetime expected credit losses significant increase in credit risk	-	*202,508*	-	389,419
Loans	-	*202,508*	-	*389,419*
Total	**199,332**	**202,514**	**180,771**	**389,419**

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	6,832,202	542,490	111,505
Medium and long-term loans and other receivables	27,331,401	2,805,971	960,340
Toplam	**34,163,603**	**3,348,461**	**1,071,845**

I. Explanations and notes related to assets of the consolidated 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	**391,723**	**9,772,587**	**10,164,310**
Mortgage loans	172	3,518,735	3,518,907
Automotive loans	13,064	294,517	307,581
General purpose loans	378,487	5,959,335	6,337,822
Other	-	-	-
Consumer loans – indexed to FC	**-**	**57**	**57**
Mortgage loans	-	57	57
Automotive loans	-	-	-
General purpose loans	-	-	-
Other	-	-	-
Consumer loans – FC	**-**	**-**	**-**
Mortgage loans	-	-	-
Automotive loans	-	-	-
General purpose loans	-	-	-
Other	-	-	-
Consumer credit cards – TL	**657,728**	**29,091**	**686,819**
With installments	212,263	29,091	241,354
Without installments	445,465	-	445,465
Consumer credit cards – FC	**-**	**-**	**-**
With installments	-	-	-
Without installments	-	-	-
Personnel loans – TL	**4,303**	**19,061**	**23,364**
Mortgage loans	-	-	-
Automotive loans	-	-	-
General purpose loans	4,303	19,061	23,364
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	**9,362**	**-**	**9,362**
With installments	2,921	-	2,921
Without installments	6,441	-	6,441
Personnel credit cards – FC	**-**	**-**	**-**
With installments	-	-	-
Without installments	-	-	-
Overdraft accounts – TL (real person)	**185,121**	**-**	**185,121**
Overdraft accounts – FC (real person)	**-**	**-**	**-**
Total	**1,248,237**	**9,820,796**	**11,069,033**

I. Explanations and notes related to assets of the consolidated 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	**789,236**	**3,836,304**	**4,625,540**
Real estate loans	-	20,682	20,682
Automotive loans	932	104,156	105,088
General purpose loans	-	-	-
Other	788,304	3,711,466	4,499,770
Commercial installment loans – indexed to FC	**9**	**49,719**	**49,728**
Real estate loans	-	-	-
Automotive loans	-	4,918	4,918
General purpose loans	-	-	-
Other	9	44,801	44,810
Commercial installment loans-FC	**5,217**	**9,976**	**15,193**
Real estate residential loans	-	-	-
Automotive loans	-	-	-
General purpose loans	-	-	-
Other	5,217	9,976	15,193
Corporate credit cards – TL	**39,342**	**-**	**39,342**
With installments	14,028	-	14,028
Without installments	25,314	-	25,314
Corporate credit cards – FC	**-**	**-**	**-**
With installments	-	-	-
Without installments	-	-	-
Overdraft loans – TL (legal entity)	**87,267**	**-**	**87,267**
Overdraft loans – FC (legal entity)	**-**	**-**	**-**
Total	**921,071**	**3,895,999**	**4,817,070**

5.6. Loans according to borrowers

	Current period	Prior period
Public or Goverment loans	3,447,352	3,352,553
Private loans	35,136,557	41,535,253
Total	**38,583,909**	**44,887,806**

5.7. Domestic and foreign loans

	Current period	Prior period
Domestic loans	38,577,999	44,478,592
Foreign loans	5,910	409,214
Total	**38,583,909**	**44,887,806**

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

5.8. Loans granted to subsidiaries and associates

The loans granted to subsidiaries and associates are eliminated at the consolidated financial statements.

5.9. Specific provisions set aside against loans

	Current period	Prior period
Loans and receivables with limited collectability	147,895	141,226
Loans and receivables with doubtful collectability	260,303	164,068
Uncollectible loans and receivables	1,188,033	759,555
Total	**1,596,231**	**1,064,849**

5.10. Information on non-performing loans (net)

5.10.1. Information on non-performing loans and other receivables restructured or rescheduled by the Group

	Group III	Group IV	Group V
	Loans and receivables with limited collectability	Loans and receivables with doubtful collectability	Uncollectible loans and receivables
Current period			
Gross amounts before specific provision	12,870	2,100	9,016
Restructured loans	12,870	2,100	9,016
Prior period			
Gross amounts before specific provision	222	509	4,720
Restructured loans	222	509	4,720

5.10.2. Information on total non-performing loans

	Group III	Group IV	Group V
	Loans and receivables with limited collectability	Loans and receivables with doubtful collectability	Uncollectible loans and receivables
Prior period end balance	**702,887**	**383,292**	**1,002,611**
Additions (+)	1,668,851	20,686	150,756
Transfers from other categories of non-performing loans (+)	-	1,634,300	1,256,261
Transfers to other categories of non-performing loans (-)	(1,634,300)	(1,256,261)	-
Collections (-)	(300,410)	(164,096)	(329,084)
Write-offs (-)	(299)	(822)	(11,189)
Sold Portfolio (-) (*)	-	-	(149,567)
Corporate and commercial loans	-	-	(16,682)
Retail loans	-	-	(103,427)
Credit cards	-	-	(29,458)
Other	-	-	-
Current period end balance	**436,729**	**617,099**	**1,919,788**
Provisions (-)	(147,895)	(260,303)	(1,188,033)
Net balance on balance sheet	**288,834**	**356,796**	**731,755**

(*) The Bank sold non-performing loan portfolio amounting to TL 149,567 to domestic asset management companies at 20 November 2019.

I. Explanations and notes related to assets of the consolidated 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	60,901	51,548	67,013
Provision (-)	(48,975)	(25,391)	(34,605)
Net balance on balance sheet	**11,926**	**26,157**	**32,408**
Prior period			
Balance at the end of the period	19,589	2,647	41,827
Provision (-)	(4,191)	(1,447)	(32,414)
Net balance on balance sheet	**15,398**	**1,200**	**9,413**

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)	**288,834**	**356,796**	**731,755**
Loans granted to corporate entities and real person (gross)	415,051	617,099	1,912,465
Provision amount(-)	(143,342)	(260,303)	(1,180,710)
Loans granted to corporate entities and real person (net)	271,709	356,796	731,755
Banks (gross)	-	-	-
Provision amount (-)	-	-	-
Banks (net)	-	-	-
Other loans (gross)	21,678	-	7,323
Provision amount (-)	(4,553)	-	(7,323)
Other loans (net)	17,125	-	-
Prior period (net)	**561,661**	**219,224**	**243,056**
Loans granted to corporate entities and real person (gross)	676,253	383,292	994,380
Provision amount (-)	(136,996)	(164,068)	(751,324)
Loans granted to corporate entities and real person (net)	539,257	219,224	243,056
Banks (gross)	-	-	-
Provision amount (-)	-	-	-
Banks (net)	-	-	-
Other loans (gross)	26,634	-	8,231
Provision amount (-)	(4,230)	-	(8,231)
Other loans (net)	22,404	-	-

I. Explanations and notes related to assets of the consolidated 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)	**15,324**	**18,375**	**22,847**
Interest accruals and valuation differences	20,026	31,094	41,301
Provision (-)	(4,702)	(12,719)	(18,454)
Prior period (Net)	**16,522**	**4,492**	**-**
Interest accruals and valuation differences	20,065	6,287	-
Provision (-)	(3,543)	(1,795)	-

5.11. Liquidation policy for uncollectible loans and receivables

In case there are collaterals in accordance with the Article 8 of "Regulation on Principles and Procedures on Determining the Qualifications of Banks' Loans and Other Receivables and Provision for these Loans and other Receivables" the receivable shall be collected as soon as possible by either administrative or legal interferences by liquidating such collaterals.

In case there are no collaterals, even if the evidence of insolvency is provided, information gathered in various periods and legal procedures are followed to identify the assets acquired by the borrower after the insolvency.

Before and after the legal procedures, the Parent Bank attempts to collect its receivables by means of restructuring the loans and receivables from the companies showing an indication of operating on ongoing basis and having a productive contribution in the economic environment.

5.12. Information on the write-off policy

In order to collect loans and other receivables classified as "Uncollectible Loans and Receivables", the Parent Bank applies all legal procedures. At the end of the legal procedures, if the loans and receivables cannot be collected, the provisions provided for these receivables are reversed and the gross receivable amount is written down to 1 Kr (Trace cost) upon the receipt of the evidence of insolvency from the customers. The legal procedures start again for these loans and receivables carried at their trace costs if an improvement in the situation of the debtors or guarantors is identified.

The Parent Bank writes down the loans and receivables to nil before initiating a legal follow-up in case the expected amount of recovery is lower than the expected cost of the legal follow-up. The Board of Directors has authorized the senior management to make the necessary assessments within certain limits.

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

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	-	-
Collateralized / blocked investments (*)	350,729	386,219
Total	**350,729**	**386,219**

(*) Consists of bonds given as collaterals by the Parent 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	2,114,571	1,194,996
Treasury bills	-	-
Other government securities	-	-
Total	**2,114,571**	**1,194,996**

6.3. Financial assets measured at amortised cost

	Current period	Prior period
Debt securities	2,114,571	1,194,996
Quoted to stock exchange	2,114,571	1,194,996
Not quoted	-	-
Impairment provision (-)	-	-
Total	**2,114,571**	**1,194,996**

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

6.4. Movement of financial assets measured at amortised cost

	Current period	Prior period
Balances at the beginning of the period	1,194,996	1,316,936
Foreign currency differences on monetary assets	-	-
Purchases during the period	912,878	-
Disposals through sales and /redemptions	(36,299)	(142,041)
Provision for impairment (-)	-	-
Change in redemption cost	42,996	20,101
Period end balance	**2,114,571**	**1,194,996**

7. Information on associates (net)

7.1. Explanations related to the associates

The Parent Bank does not have any associates.

8. Information on subsidiaries (net)

8.1. Information on equity of subsidiaries

As of 31 December 2019 information on the equities of subsidiaries is as follows:

	ING European Financial Services Plc.	ING Factoring	ING Leasing	ING Brokerage
Paid in capital and adjustment to paid-in capital	1,291	40,000	30,000	20,765
Profit reserves, capital reserves and prior year profit / loss	-	79,141	102,327	5,655
Profit	62,924	28,330	37,262	7,724
Development cost of operating lease (-)	-	(3)	(3)	-
Intangible assets (-)	-	(533)	(361)	(15)
Total core capital	**64,215**	**146,935**	**169,225**	**34,129**
Supplementary capital	**-**	**-**	**-**	**-**
Capital	**64,215**	**146,935**	**169,225**	**34,129**
Net usable shareholder's equity	**64,215**	**146,935**	**169,225**	**34,129**

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

8.2. Information on consolidated subsidiaries

Title (*)	Address (City / CounTL)	The Parent Bank's share percentage-If different voting (%)	The Parent Bank's risk group share (%)
(1) ING European Financial Services Plc.	Dublin/Ireland	100%	100%
(2) ING Factoring	İstanbul/ Turkey	100%	100%
(3) ING Leasing	İstanbul/ Turkey	100%	100%
(4) ING Brokerage	İstanbul/ Turkey	100%	100%

(*) The sale of the shares representing 100% of the capital of ING Portfolio Management, one of the subsidiaries of the Parent Bank, to TEB Portföy Yönetimi A.Ş has been completed on 31 May 2019.

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

As of 31 December 2019 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)	7,249,105	64,215	5	318,398	-	62,924	58,258	-
(2)	575,273	147,471	1,599	91,139	-	28,330	32,261	-
(3)	1,079,463	169,589	989	65,509	-	37,262	33,605	-
(4)	142,990	34,144	180	6,408	-	7,724	5,267	-

(*) The financial information of ING Factoring, ING Leasing, ING Brokerage and ING European Financial Services Plc are obtained from 31 December 2019 audited financial statements.

8.3. Information on consolidated subsidiaries

	Current period	Prior period
Balance at the beginning of the period	95,907	95,907
Movements during the period	(12,308)	-
Purchases	-	-
Bonus shares obtained	-	-
Dividends from current year income	-	-
Sales (*)	(12,308)	-
Revaluation increase	-	-
Provisions for impairment	-	-
Balance at the end of the period	83,599	95,907
Capital commitments	-	-
Share percentage at the end of the period (%)	100	100

(*) A share sale and purchase agreement representing the 100% of capital of ING Portfolio Management has been signed between the Parent Bank and TEB Portföy Yönetimi A.Ş on 5 April 2019. The actual sales transaction and share transfer were completed on 31 May 2019 following the completion of necessary legal permissions and other procedures related to the sale in accordance with the agreement.

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

	Current period	Prior period
Banks	-	-
Insurance companies	-	-
Factoring companies	40,000	40,000
Leasing companies	22,500	22,500
Finance companies	-	-
Other financial subsidiaries	21,099	33,407

8.5. Subsidiaries quoted in a stock exchange

There are no subsidiaries quoted on a stock exchange.

9. Information on entities under common control (net)

9.1. Information on entities under common control (net)

There are no entities under common control.

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

10. Information on lease receivables (net)

10.1 Investments made in finance lease as per their maturity

	Current period		Prior period	
	Gross	Net	Gross	Net
Less than 1 year	59,001	57,789	63,387	61,946
1-5 years	839,032	785,486	967,042	901,168
More than 5 years	13,529	9,791	166,195	151,493
Total	**911,562**	**853,066**	**1,196,624**	**1,114,607**

10.2 Information of the net investments made in finance lease

	Current period	Prior period
Gross financial lease investment	911,562	1,196,624
Unearned financial lease income (-)	(58,496)	(82,017)
Cancelled leases (-)	-	-
Net financial lease investment	**853,066**	**1,114,607**

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	35,316	1,117	2,968,911	-
Net investment hedge	-	-	-	-
Total	**35,316**	**1,117**	**2,968,911**	**-**

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

12. Information on tangible assets (net)

Current period	Real estates	Leased tangible assets	Right-of-use assets	Other fixed assets	Total
Cost					
Opening balance	272,473	51,329	-	915,131	1,238,933
Additions	7,486	189	524,791	348,486	880,952
Currency differences	-	-	-	23	23
Disposals	-	(51,329)	(175,364)	(315,572)	(542,265)
Provisions for impairment	2,884	-	-	1,500	4,384
Closing balance	282,843	189	349,427	949,568	1,582,027
Accumulated depreciation					
Opening balance	(117,981)	(50,781)	-	(385,874)	(554,636)
Current year depreciation expense	(6,660)	(40)	(70,515)	(54,145)	(131,360)
Currency differences	-	-	-	(23)	(23)
Disposals	-	50,821	15,232	(15,083)	50,970
Closing balance	(124,641)	-	(55,283)	(455,125)	(635,049)
Net book value	**158,202**	**189**	**294,144**	**494,443**	**946,978**

Prior period	Real estates	Leased tangible assets	Other fixed assets	Total
Cost				
Opening balance	265,852	55,555	712,247	1,033,654
Additions	7,033	612	325,456	333,101
Currency differences	-	-	48	48
Disposals	(1,116)	(4,838)	(115,620)	(121,574)
Provisions for impairment	704	-	(7,000)	(6,296)
Closing balance	272,473	51,329	915,131	1,238,933
Accumulated depreciation				
Opening balance	(112,099)	(55,524)	(363,510)	(531,133)
Current year depreciation expense	(6,433)	(96)	(48,438)	(54,967)
Currency differences	-	-	(42)	(42)
Disposals	551	4,839	26,116	31,506
Closing balance	(117,981)	(50,781)	(385,874)	(554,636)
Net book value	**154,492**	**548**	**529,257**	**684,297**

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

13. Information on intangible assets (net)

	Current period	Prior period
Cost		
Opening balance	208,374	184,843
Additions	44,396	23,531
Disposals	(748)	-
Closing balance	252,022	208,374
Accumulated amortization		
Opening balance	(167,586)	(144,788)
Current year's amortization expense	(29,955)	(22,798)
Disposals	690	-
Closing balance	(196,851)	(167,586)
Net book value	**55,171**	**40,788**

14. Information on investment properties (net)

The Group does not have investment properties.

15. Explanations on deferred tax asset

15.1. Explanations on current tax asset

As of 31 December 2019 current tax asset and corporation tax payable are netted of and accounted as current tax liability in the consolidated balance sheet. The explanations about current tax asset / liability for the current and previous period are disclosed in Note II.9 of Section Five.

15.2. Explanations on deferred tax asset

Deferred tax asset and liability are netted of based on the Parent Bank and each company subject to consolidation, and shown as deferred tax asset or liability in the consolidated balance sheet. The explanations about deferred tax asset / liability for the current and prior period are disclosed in Note II.9 of Section Five.

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	660
Additions	-	-
Disposals (-)	-	-
Depreciation (-)	-	-
Balance at the end of the period (net)	**660**	**660**

16.2. Explanations on discontinued operations

The Group 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.

II. Explanations and notes related to liabilities of the consolidated 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	831,751	-	16,240,073	4,026,182	99,910	44,510	24,430	-	21,266,856
Foreign currency deposits	2,887,424	-	6,294,457	3,655,967	182,604	69,118	21,210	-	13,110,780
Residents in Turkey	2,674,621	-	6,215,787	3,523,314	154,601	60,151	19,799	-	12,648,273
Residents abroad	212,803	-	78,670	132,653	28,003	8,967	1,411	-	462,507
Public sector deposits	227,064	-	-	11,718	82	-	-	-	238,864
Commercial deposits	603,973	-	1,113,385	92,821	2,704	2,877	-	-	1,815,760
Other institutions deposits	11,704	-	914	15,328	90	132	95	-	28,263
Precious metals deposits	383,889	-	-	-	-	-	-	-	383,889
Interbank deposits	2,005,107	-	119,046	-	-	-	1,161	-	2,125,314
Central Bank of Turkey	-	-	-	-	-	-	-	-	-
Domestic banks	2	-	119,046	-	-	-	-	-	119,048
Foreign banks	2,005,105	-	-	-	-	-	1,161	-	2,006,266
Participation banks	-	-	-	-	-	-	-	-	-
Other	-	-	-	-	-	-	-	-	-
Total	**6,950,912**	**-**	**23,767,875**	**7,802,016**	**285,390**	**116,637**	**46,896**	**-**	**38,969,726**

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	536,506	-	13,392,719	3,403,652	410,389	159,553	59,788	-	17,962,607
Foreign currency deposits	1,923,472	-	4,799,089	2,677,206	139,011	122,450	202,156	-	9,863,384
Residents in Turkey	1,703,348	-	4,730,165	2,563,909	131,998	114,289	201,221	-	9,444,930
Residents abroad	220,124	-	68,924	113,297	7,013	8,161	935	-	418,454
Public sector deposits	241,369	-	-	9,941	719	-	-	-	252,029
Commercial deposits	560,766	-	812,430	273,833	13,975	7,281	37,585	-	1,705,870
Other institutions deposits	17,236	-	2,647	11,085	195	161	77	-	31,401
Precious metals deposits	170,212	-	-	-	-	-	-	-	170,212
Interbank deposits	2,291,934	-	-	-	-	-	-	-	2,291,934
Central Bank of Turkey	-	-	-	-	-	-	-	-	-
Domestic banks	726	-	-	-	-	-	-	-	726
Foreign banks	2,291,208	-	-	-	-	-	-	-	2,291,208
Participation banks	-	-	-	-	-	-	-	-	-
Other	-	-	-	-	-	-	-	-	-
Total	**5,741,495**	**-**	**19,006,885**	**6,375,717**	**564,289**	**289,445**	**299,606**	**-**	**32,277,437**

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	15,320,004	12,397,645	5,935,983	5,560,491
Foreign currency saving deposits	4,343,663	2,783,584	5,705,258	4,649,289
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	-	-	-	-

II. Explanations and notes related to liabilities of the consolidated 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 Parent Bank headquartered abroad are in scope of insurance in the country where the head office is located

The Parent 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	18,655	14,738
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	-	39,986	-	88,476
Swap transactions	470,640	113,004	652,663	103,201
Future transactions	-	-	-	-
Options	326	3,042	262	3,754
Other	-	-	-	-
Total	**470,966**	**156,032**	**652,925**	**195,431**

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	248,911	137,111	120,084	791,740
Funds borrowed from foreign banks, institutions and funds	64,606	10,407,016	347,858	20,107,692
Total	**313,517**	**10,544,127**	**467,942**	**20,899,432**

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

3.2. Maturity analysis of funds borrowed

	Current period		Prior period	
	TL	FC	TL	FC
Short term	282,873	68,576	128,190	1,734,370
Medium and long term	30,644	10,475,551	339,752	19,165,062
Total	**313,517**	**10,544,127**	**467,942**	**20,899,432**

3.3. Funding industry group where the Group liabilities are concentrated

The Group's liabilities are concentrated on the main shareholder, ING Bank NV.

4. Explanations on securities issued (net)

The Group does not have any securities issued end of the reporting period (31 December 2018: 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	850	806	-	-
Between 1-4 years	117,963	97,473	-	-
More than 4 year	322,830	200,500	-	-
Total	**441,643**	**298,779**	**-**	**-**

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	-	-	-	-
Cash flow hedge	348,720	6,658	258,878	4,528
Net investment hedge	-	-	-	-
Total	**348,720**	**6,658**	**258,878**	**4,528**

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

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 2018: None).

8.2. Information on other provisions

	Current period	Prior period
Specific provisions for undrawn non-cash loans	32,363	28,294
Provision for credit card score promotion	1,373	1,833
Other provisions	134,699	187,289
Allowance for expected credit losses (Stage 1 and Stage 2) (*)	*35,393*	*48,330*
Other	*99,306*	*138,959*
Total	**168,435**	**217,416**

(*) Non-cash loan provisions are included.

Amount to TL 69,601 (31 December 2018: TL 71,383) 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 Parent Bank.

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

SDIF, however, does not fully indemnify the Parent Bank and pays these amounts subject to legal reservation against the STA provisions. SDIF initiated eight enforcement proceedings to claim the amount it had indemnified, a total of approximately TL 478 million (Full TL). Upon the Parent Bank's objection to legal grounds of the enforcement proceedings initiated by SDIF against the Parent Bank, SDIF initiated cancellation of objection lawsuits against the Parent Bank. Currently, there are seven of such lawsuits: (i) the first case relates to the first enforcement proceeding of approximately TL 21.9 million (Full TL) (the "First Case"), (ii) the second case relates to the second enforcement proceeding of approximately TL 21.8 million (Full TL) (the "Second Case"), (iii) the third case relates to the third and fifth enforcement proceedings of a total of approximately TL 97.7 million (Full TL) (the "Third Case") and (iv) the fourth case relates to the fourth enforcement proceeding of approximately TL 109.5 million (Full TL) (the "Fourth Case"). SDIF has not yet initiated a case in connection with the sixth enforcement proceeding of approximately TL 126 million (Full TL) against which the Parent Bank objected and SDIF filed a lawsuit (the "Sixth Case") for the cancellation of objection lawsuit. Furthermore, SDIF initiated the seventh enforcement procedure for approximately TL 52 million and the Parent Bank objected to this payment request and the case was filed by the SDIF. The case is going on the first instance court. SDIF initiated the eighth enforcement procedure for approximately TL 49 million (Full TL) and the Parent Bank objected to this payment request.

In the First Case, the first instance court ruled in favor of the Parent Bank, which was later reversed by the Supreme Court of Appeals (Yargıtay). Currently, the First Case is before the first instance court following the appellate decision, where the court of first instance decided to obtain an expert opinion in accordance with the Supreme Court of Appeals' decision. Following the court appointed expert's examination of the case, the expert report is completed and it is in favor of the Parent Bank. The first instance court decided in favor of the Bank however SDIF is entitled to appeal against the decision. In this case, information was received that the appeal of the SDIF was rejected and the decision was upheld in favor of the Parent Bank. Against this approval decision, the Court of Cassation, the way of correction of the decision is clear. In case the SDIF makes a decision correction, the decision is expected to be finalized in favor of the Parent Bank in the first half of 2020. The first instance court held the trial of the Second Case, Third Case and Fourth Case together due to the first instance court's earlier decision to merge these cases. However, the first instance court only ruled on the

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

merits of the Second Case in favor of ING Bank A.Ş. and rejected SDIF's claims and decided to demerge each of the Third Case and the Fourth Case from the Second Case. In the proceedings held after the court's demerger decision, the court decided in favor of the Parent Bank for each case. Also in the sixth case, the first instance court decided in favor of the bank.

The court's decision in the Second Case and in the other cases are subject to a two-tiered appeal, i.e., appeal before the regional appellate court and the Supreme Court of Appeals.

On the other hand, there is an administrative law dispute between the Parent Bank and SDIF. The Parent 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 Parent 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 Parent 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 Parent 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 Parent 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 STA, (ii) relevant provisions of the of the Share Purchase Agreement dated 18 June 2007 relating to the purchase of the Parent 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 2019, TL 30,898 (31 December 2018: TL 30,779) of TL 57,205 (31 December 2018: TL 53,664) provisions for employee benefits is the unused vacation provisions. Full provision is provided for the unused vacation liability.

TL 26,307 (31 December 2018: TL 22,885) of the provisions for employee benefits is the termination benefit provision. In accordance with the labor law, the Group 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 6,379.86 (Full TL) at 31 December 2019 and TL 5,434.42 (Full TL) at 31 December 2018 per year of employment at the rate of pay applicable at the date of retirement or termination.

In the consolidated financial statements dated 31 December 2019 and 31 December 2018, the Group 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	3.71%	3.84%
Inflation rate	8.2%	9.3%
Interest rate	12.2%	13.5%
Probability of severance	32.9%	30.9%

Movement of the provision for termination benefit:

	Current period	Prior period
Balance at the beginning of the period	22,885	18,244
Change during the year	18,988	14,715
Actuarial gain	1,138	1,974
Benefits paid during the year	(16,704)	(12,048)
Balance at the end of the period	**26,307**	**22,885**

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

9. Explanations on tax liability

9.1. Explanations on current tax liability

9.1.1. Explanations on tax provision

The Group has current corporate tax liability as of 31 December 2019 amounting to TL 42,308 (31 December 2018: TL 140,774).

9.1.2. Information on taxes payable

	Current period	Prior period
Corporate tax payable	42,308	140,774
Taxation of securities	35,451	42,224
Property tax	839	1,250
Banking insurance transaction tax ("BITT")	21,917	38,321
Foreign exchange transaction tax	2,312	-
Value added tax payable	6,390	5,571
Other	11,123	10,569
Total	**120,340**	**238,709**

9.1.3. Information on premiums

	Current period	Prior period
Social security premiums-employee	5,030	4,869
Social security premiums-employer	7,361	7,128
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	363	352
Unemployment insurance-employer	699	678
Other	-	-
Total	**13,453**	**13,027**

9.2. Explanations on deferred tax liabilities

As of 31 December 2019, deferred tax asset and deferred tax liability of the Group amounts to TL 47 and TL 191,341 respectively (31 December 2018: deferred tax asset is TL 11,293 and deferred tax liability is TL 430,595) 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 (*)	147,050	31,955	213,843	44,555
Fair value differences for financial assets and liabilities	66,265	14,011	(39,562)	(7,820)
Derivative valuation differences	(1,657,747)	(339,707)	(2,828,546)	(595,560)
Expected credit losses of Stage I and II	416,470	83,731	618,520	136,074
Other	95,577	18,716	15,677	3,449
Total deferred tax assets / (liabilities) net		**(191,294)**		**(419,302)**

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

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

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

Deferred tax assets / (liabilities) net	Current period (1 January – 31 December 2019)	Prior period (1 January – 31 December 2018)
Prior period beginning balance	**(419,302)**	**(330,524)**
TFRS 9 effect	-	77,316
Opening balance	**(419,302)**	**(253,208)**
Deferred tax income / (expense) net	48,022	(73,337)
Deferred tax recognized under equity	179,986	(92,757)
Balance at the end of the period	**(191,294)**	**(419,302)**

10. Information on liabilities regarding assets held for sale

As of 31 December 2019 and 31 December 2018, there are no liabilities regarding assets held for sale.

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	**-**	**4,237,398**	**-**	**3,813,522**
Subordinated loans (*)	-	4,237,398	-	3,813,522
Subordinated debt instruments	-	-	-	-
Total	**-**	**4,237,398**	**-**	**3,813,522**

(*) In accordance with the 9th Clause of the 8th Article of the "Regulation on Equity of Banks", subordinated loans of the parent bank amounting to USD 102 million and EUR 90 million and USD 91 million and EUR 85 million are amortised by 20% and then included in Tier II Capital, as their remaining maturity is less than five years as of 31 December 2019.

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

There is no capital increase in the current period by the capital increases and their sources.

12.4. Information on share capital increases from capital reserves

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

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

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 Group'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 Group's equity:

The Group's consolidated balance sheet is managed in a conservative manner in order to be minimally affected by interest, currency and credit risks. The Group'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 Group 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.

12.8. Information on marketable securities revaluation reserve

	Current period		Prior period	
	TL	FC	TL	FC
From associates, subsidiaries, and entities under common control	-	-	-	-
Valuation difference	81,277	-	(13,421)	-
Foreign exchange difference	-	-	-	-
Total	**81,277**	**-**	**(13,421)**	**-**

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 21 March 2019, the distribution of the net profit of the year 2018, is as follows.

Profit distribution table of 2018	
2018 net profit	**1,061,760**
A – I. Legal Reserve (TCC 519/A) 5%	(53,088)
B – The First Dividend for Shareholders	-
C – Extraordinary Reserves	(1,007,695)
D – Special funds	(977)

III. Explanations and notes related to consolidated 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	4,392,239	1,299,103
Forward deposit purchase and sales commitments	-	-
Loan granting commitments	2,342,104	1,823,151
Commitments for cheque payments	271,795	352,249
Commitments for credit card limits	1,300,950	1,553,684
Commitments for credit cards and banking services promotions	5,732	5,479
Other irrevocable commitments	27,676	24,162
Total	**8,340,496**	**5,057,828**

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
Letter of credits	1,125,746	1,764,338
Commitments and contingencies	484,712	473,848
Bank acceptance loans	4,008	39,370
Total	**1,614,466**	**2,277,556**

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

	Current period	Prior period
Irrevocable letters of guarantees	5,196,801	5,552,334
Cash loans letters of guarantees	943,427	354,480
Advance letters of guarantees	473,458	569,482
Temporary letters of guarantees	27,687	54,865
Other	84,635	78,752
Total	**6,726,008**	**6,609,913**

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	1,140,722	602,360
With original maturity of 1 year or less than 1 year	334,422	97,091
With original maturity of more than 1 year	806,300	505,269
Other non-cash loans	7,199,752	8,285,109
Total	**8,340,474**	**8,887,469**

III. Explanations and notes related to consolidated 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	**6,744**	**0.40**	**11,176**	**0.17**	**11,866**	**0.55**	**16,673**	**0.25**
Farming and raising	3,241	0.19	11,176	0.17	8,334	0.39	15,391	0.23
Forestry	34	-	-	-	3,095	0.14	1,282	0.02
Fishing	3,469	0.21	-	-	437	0.02	-	-
Manufacturing	**264,510**	**15.84**	**4,060,323**	**60.87**	**310,402**	**14.35**	**4,363,417**	**64.89**
Mining	8,049	0.48	1,852,903	27.78	12,546	0.58	1,797,814	26.74
Production	234,023	14.02	1,939,720	29.08	268,590	12.42	2,103,545	31.28
Electric, gas and water	22,438	1.34	267,700	4.01	29,266	1.35	462,058	6.87
Construction	**219,062**	**13.12**	**687,075**	**10.29**	**393,084**	**18.17**	**433,332**	**6.43**
Services	**1,168,624**	**70.00**	**1,908,843**	**28.62**	**1,431,974**	**66.19**	**1,906,859**	**28.37**
Wholesale and retail trade	760,787	45.57	563,522	8.45	976,993	45.16	264,234	3.93
Hotel, food and beverage	13,541	0.81	91,559	1.37	12,867	0.59	115,526	1.72
Transportation and telecommunication	89,305	5.35	97,498	1.46	70,493	3.26	124,735	1.86
Financial institutions	204,829	12.27	1,016,698	15.24	272,171	12.58	1,369,459	20.37
Real estate and renting services	20,154	1.21	8,407	0.13	33,172	1.53	12,716	0.19
Self-employment services	69,850	4.18	131,159	1.97	55,515	2.57	20,189	0.30
Education services	44	-	-	-	151	0.01	-	-
Health and social services	10,114	0.61	-	-	10,612	0.49	-	-
Other	**10,654**	**0.64**	**3,463**	**0.05**	**15,925**	**0.75**	**3,937**	**0.08**
Total	**1,669,594**	**100.00**	**6,670,880**	**100.00**	**2,163,251**	**100.00**	**6,724,218**	**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	1,587,072	6,635,784	33,174	22,827
Letter of guarantees	1,567,042	5,043,836	33,174	22,827
Bank acceptances	-	4,008	-	-
Letter of credits	445	1,122,819	-	-
Endorsements	-	-	-	-
Underwriting commitments	-	-	-	-
Factoring commitments	15,956	72,089	-	-
Other	3,629	393,032	-	-

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

2. Information on derivative transactions

	Current period	Prior period
Types of hedging transactions		
Fair value hedges (I)	**-**	**-**
Purchase transactions	-	-
Sale transactions	-	-
Cash flow hedges (II)	**7,285,819**	**26,719,475**
Purchase transactions	3,642,910	14,465,746
Sale transactions	3,642,909	12,253,729
Net investment hedges (III)	**-**	**-**
Purchase transactions	-	-
Sale transactions	-	-
A. Total derivatives held for hedging (I+II+III)	**7,285,819**	**26,719,475**
Derivative transactions held for trading		
Trading transactions (I)	**55,320,670**	**59,440,909**
Forward foreign currency transactions – buy	4,317,942	7,202,649
Forward foreign currency transactions – sell	4,319,914	6,967,827
Swap transactions- buy	22,137,821	21,369,482
Swap transactions – sell	20,310,903	22,010,433
Foreign currency options – buy	2,117,045	945,259
Foreign currency options – sell	2,117,045	945,259
Foreign currency futures – buy	-	-
Foreign currency futures – sell	-	-
Interest rate derivatives (II)	**30,932,456**	**10,318,994**
Interest rate swap - buy	15,466,228	5,159,497
Interest rate swap - sell	15,466,228	5,159,497
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)	**-**	**33,366**
B. Total derivative transactions held for trading (I+II+III)	**86,253,126**	**69,793,269**
Total derivative transactions (A+B)	**93,538,945**	**96,512,744**

3. Information on credit swaps and related risks

As of 31 December 2019 and 31 December 2018, there are no credit derivative transactions.

4. Information on contingent liabilities and assets

As of 31 December 2019, a total provision of TL 83,601 (31 December 2018: TL 71,383) separated other provisions are under the item, considering legal assessment for the lawsuits with a high probability of resulting against the Group 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 note IX of Section Four.

IV. Explanations and notes related to consolidated 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
Interest on loans (*)	4,813,123	763,901	5,632,297	736,128
Short term loans	1,410,495	100,283	2,247,099	61,986
Medium and long term loans	3,168,480	663,618	3,285,215	674,142
Interest on loans under follow-up	234,148	-	99,983	-
Premiums received from resource utilization support fund	-	-	-	-

(*) 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	-	-	-	-
From domestic banks	53,418	6,459	58,041	3,087
From foreign banks	455	38,519	9,598	22,041
From branches abroad	-	-	-	-
Total	**53,873**	**44,978**	**67,639**	**25,128**

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	19,866	597	32,300	850
Financial assets measured at fair value through other comprehensive income	152,865	-	73,946	-
Financial assets measured at amortised cost	270,761	-	162,730	-
Total	**443,492**	**597**	**268,976**	**850**

1.4 Information on interest income received from associates and subsidiaries

The interest income from subsidiaries is eliminated in the accompanying consolidated financial statements.

IV. Explanations and notes related to consolidated 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 (*)	64,338	412,640	133,102	517,141
Central Bank of Turkey	-	-	-	-
Domestic banks	29,031	4,458	15,854	6,872
Foreign banks	35,307	408,182	117,248	510,269
Branches and offices abroad	-	-	-	-
Other institutions (*)	-	5,003	-	6,105
Total	**64,338**	**417,643**	**133,102**	**523,246**

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

2.2. Information on interest expenses paid to associates and subsidiaries

The interest expenses paid to subsidiaries are eliminated in the consolidated financial statements.

2.3. Information on interest on securities issued

	Current period		Prior period	
	TL	FC	TL	FC
Interest on securities issued	-	-	20,632	-

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

		Time deposit						
Account name	**Demand deposit**	**Up to 1 month**	**Up to 3 months**	**Up to 6 months**	**Up to 1 year**	**More than 1 year**	**Accumulated deposits**	**Total**
Turkish lira								
Bank deposits	-	882	-	-	-	-	-	882
Saving deposits	-	2,320,327	640,117	41,731	19,842	17,608	-	3,039,625
Public sector deposits	-	-	2,251	102	-	-	-	2,353
Commercial deposits	-	130,666	48,670	1,690	1,248	4,452	-	186,726
Other deposits	-	193	1,803	15	19	29	-	2,059
7 days call accounts	-	-	-	-	-	-	-	-
Total	**-**	**2,452,068**	**692,841**	**43,538**	**21,109**	**22,089**	**-**	**3,231,645**
Foreign currency								
Foreign currency deposits	-	93,775	70,099	2,942	1,949	1,382	-	170,147
Banks deposits	-	17,778	-	-	-	-	-	17,778
7 days call accounts	-	-	-	-	-	-	-	-
Precious metal deposits	-	-	-	-	-	-	-	-
Total	**-**	**111,553**	**70,099**	**2,942**	**1,949**	**1,382**	**-**	**187,925**
Grand total	**-**	**2,563,621**	**762,940**	**46,480**	**23,058**	**23,471**	**-**	**3,419,570**

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

3. Information on dividend income

	Current period	Prior period
Financial assets at fair value through profit or loss	-	-
Financial assets at fair value through other comprehensive income	3,115	167
Other	-	-
Total	**3,115**	**167**

4. Information on trading income/loss (net)

	Current period	Prior period
Income	**26,693,474**	**46,407,240**
Gains on capital market transactions	68,029	41,614
Gains on derivative financial instruments	13,753,231	20,827,374
Foreign exchange gains	12,872,214	25,538,252
Loss (-)	**(26,087,644)**	**(46,584,867)**
Loss on capital market transactions	(70,709)	(82,502)
Loss on derivative financial instruments	(12,824,835)	(17,627,422)
Foreign exchange loss	(13,192,100)	(28,874,943)

Net profit on derivative financial instruments recognized in profit/loss resulting from fluctuations in foreign exchange rates is TL 18,994 (31 December 2018: TL 2,772,426 net profit).

5. Information on other operating income

	Current period	Prior period
Income from reversal of prior years' provisions	480,435	570,198
Income arising from sale of assets	55,314	16,138
Banking services income	2,944	4,625
Other non-interest income	66,195	61,195
Total	**604,888**	**652,156**

6. Allowance for expected credit losses

	Current period	Prior period
Expected credit losses	1,217,044	1,286,463
12-Month expected credit loss (Stage 1)	68,159	128,558
Expected credit loss significant increase in credit risk (Stage 2)	14,469	267,837
Expected credit loss impaired credits (Stage 3)	1,134,416	890,068
Impairment losses on securities	199	91
Financial assets measured at fair value through profit/loss	199	65
Financial assets measured at fair value through other comprehensive income	-	26
Impairment losses on associates, subsidiaries and joint-ventures	-	-
Associates	-	-
Subsidiaries	-	-
Joint ventures	-	-
Other	-	-
Total	**1,217,243**	**1,286,554**

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

7. Information on other operating expenses

	Current period	Prior period
Reserves for employee termination benefits	2,284	2,667
Bank social aid fund deficit provision	-	-
Tangible assets impairment expense	5,500	7,000
Depreciation expense of tangible assets	131,360	54,967
Intangible assets impairment expense	-	-
Goodwill impairment expense	-	-
Amortisation expense of intangible assets	29,955	22,798
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	765,281	806,534
Operating lease expenses related with IFRS 16 exception (*)	16,011	116,970
Repair and maintenance expenses	34,653	33,387
Advertisement expenses	101,741	86,424
Other expenses	612,876	569,753
Loss on sales of assets	22,977	2,586
Other	262,016	234,740
Total	**1,219,373**	**1,131,292**

(*) Amount of 31 December 2018 represents all operating lease expenses.

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

As of 31 December 2019, the income before taxes is TL 1,975,930 (31 December 2018: TL 1,454,306).

9. Information on tax provision for continued and discontinued operations

As of 31 December 2019, the corporate tax provision expense for the period is TL 482,086 (31 December 2018: TL 240,335), and the deferred tax income is TL 48,022 (31 December 2018: TL 73,337 deferred tax expense).

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

As of 31 December 2019, the net operating income after taxes is TL 1,541,866 (31 December 2018: TL 1,140,634).

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

Interest income from regular banking transactions is TL 7,424,141 (31 December 2018: TL 7,273,105), while the interest expense is TL 3,961,663 (31 December 2018: TL 3,612,001).

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 550,295 (31 December 2018: TL 568,414) has included TL 197,911 (31 December 2018: TL 170,786) resulting from the credit card fees and commissions, TL 92,639 (31 December 2018: TL 125,396) resulting from service fees and commissions from contracted merchants and TL 144,548 (31 December 2018: TL 118,079) resulting from insurance commissions.

Other fees and commissions paid amounting to TL 195,753 (31 December 2018: TL 229,555) has included TL 115,225 (31 December 2018: TL 157,276) resulting from credit card exchange commissions.

V. Explanations and notes related to consolidated 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 Parent Bank was held on 21 March 2019. In the Ordinary General Assembly meeting, it was decided to transfer TL 1,061,760 unconsolidated net income from 2018 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 53,088, TL 1,007,695 and TL 977, respectively.

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

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

As of the balance sheet date, consolidated legal reserves amount to TL 256,871 (31 December 2019: TL 201,819), and TL 977 (31 December 2018: TL 94,189) of this amount consists of the amount transferred from the previous year profit within the current period.

As of the balance sheet date, consolidated extraordinary reserves amount to TL 3,191,970 (31 December 2018: 2,095,973 TL).

VI. Explanations and notes related to the consolidated 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 2018	31 December 2017
Cash	**1,641,075**	**2,269,445**
Cash in vault	291,079	299,403
Cash in foreign currency	1,349,996	1,970,042
Cash equivalents	**9,779,316**	**2,853,059**
Central Bank of Turkey	4,517,388	1,178,608
Banks	914,276	481,250
Interbank money market	4,347,652	1,193,201
Total	**11,420,391**	**5,122,504**

1.2. Cash and cash equivalents at the end of period

	31 December 2019	31 December 2018
Cash	**1,253,373**	**1,641,075**
Cash in vault	305,785	291,079
Cash in foreign currency	947,588	1,349,996
Cash equivalents	**12,152,246**	**9,779,316**
Central Bank of Turkey	3,146,437	4,517,388
Banks	749,232	914,276
Interbank money market	8,256,577	4,347,652
Total	**13,405,619**	**11,420,391**

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

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 126,267 increase (31 December 2018: TL 81,958 increase) under "Operating profit before changes in operating assets and liabilities" consists of other operational incomes.

Amounting to TL 1,605,814 decrease (31 December 2018: TL 143,938 decrease) 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 3,046,096 increase (31 December 2018: TL 227,686 increase) under "Changes in operating assets and liabilities" consists of mainly changes in prepaid expenses, factoring and leasing receivables and changes in exchange accounts under other assets.

Amounting to TL 1,173,071 decrease (31 December 2018: TL 1,612,979 increase) 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.

Amounting to TL 43,647 decrease (31 December 2018: TL 23,531 decrease) under "Net cash flow from investment activities" consists of mainly purchase of intangible assets.

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 964,621 (31 December 2018: TL 1,175,197).

VII. Explanations and notes related to risk group of the Parent 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 Group	Subsidiaries, associates and joint ventures (partnerships)		Direct and indirect shareholders of the Parent Bank		Other entities included in the risk group	
	Cash	Non-cash	Cash	Non-cash	Cash	Non-cash
Loans and other receivables						
Beginning of the period	-	-	71	570,374	47	200,958
End of the period	-	-	120	569,874	39	201,879
Interest and commission income	-	-	4	1,260	-	280

1.2. Prior period

Risk group of the Group	Subsidiaries, associates and joint ventures (partnerships)		Direct and indirect shareholders of the Parent Bank		Other entities included in the risk group	
	Cash	Non-cash	Cash	Non-cash	Cash	Non-cash
Loans and other receivables						
Beginning of the period	-	-	30	438,513	13	197,080
End of the period	-	-	71	570,374	47	200,958
Interest and commission income	-	-	675	890	-	344

VII. Explanations and notes related to the risk group of the Parent Bank (continued)

1.3. Information on deposit balances of the risk group of the Group

Risk group of the Group	Subsidiaries, associates and joint ventures (partnerships)		Direct and indirect shareholders of the Parent 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	-	-	25,152	8,426	2,400	3,070
End of the period	-	-	102,613	25,152	29,018	2,400
Interest expense on deposits	-	-	497	478	688	279

1.4. Information on forward and option agreements and other similar agreements entered into with the risk group of the Group

Risk group of the Group	Subsidiaries, associates and joint ventures (partnerships)		Direct and indirect shareholders of the Parent 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 and loss						
Beginning of the period	-	-	11,502,875	9,971,955	20,039	33,080
End of the period	-	-	23,135,735	11,502,875	27,994	20,039
Total profit/loss	-	-	88,037	(96,605)	41,236	101,253
Transactions with hedging purposes						
Beginning of the period	-	-	-	-	-	-
End of the period	-	-	2,005,290	-	-	-
Total profit/loss	-	-	(31,269)	-	-	-

1.5. Information on placements made with the risk group of the Group

Risk group of the Group	Subsidiaries, associates and joint ventures (partnerships)		Direct and indirect Shareholders of the Parent 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	-	-	13,741	63,734	67,664	90,087
End of the period	-	-	93,206	13,741	8,121	67,664
Interest income received	-	-	698	10,509	142	236

1.6. Information on loans borrowed from the risk group of the Group

Risk group of the Group	Subsidiaries, associates and joint ventures (partnerships)		Direct and indirect Shareholders of the Parent 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	-	-	14,502,679	15,505,498	7,702	8,403
End of the period	-	-	9,411,987	14,502,679	3,901	7,702
Interest and commission paid	-	-	132,503	207,168	1,495	915

The Group also has subordinated loan amounting to TL 4,237,398 from its shareholder ING Bank NV as of 31 December 2019 (31 December 2018: TL 3,813,522).

1.7 Information regarding benefits provided to the Group's top management:

Benefits paid to key management personnel for the year ended as of 31 December 2019 is amounting to TL 39,933 (31 December 2018: TL 32,112).

VIII. Explanations and notes related to the domestic, foreign, off-shore branches and foreign representatives of the Parent Bank

	Number	Number of employees
Domestic branches	210	3,825

			Country
Foreign representative offices	-	-	-

			Total assets	Capital
Foreign branches	-	-	-	-
Off-shore banking region branches	-	-	-	-

Section six

Other Explanations

I. Other explanations on the Parent Bank's operations

None.

II. Explanations and notes related to subsequent events

Chief Executive Officer and BoD Member of the Parent Bank, Pınar Abay, has resigned from her duty as of 1 January 2020 to be appointed as Global Executive Committee Member of ING Group. A. Canan Ediboğlu has been appointed as Deputy Chief Executive Officer per the Board of Directors resolution No. 82/1 and dated 24 December 2019, starting from 1 January 2020. Pınar Abay, has been appointed as the Member of the Board of Directors according to the Board of Directors resolution No. 2 and dated 6 January 2020.

Corporate Banking Executive Vice President of the Parent Bank, Alper Hakan Yüksel, has resigned from his duty as of 1 January 2020 to be appointed as Global Head of LAM Head for EMEA Region of ING Group. Financial Institutions and Debt Capital Markets Executive Vice President of the Parent Bank, Ayşegül Akay, has been appointed as the Executive Vice President for Corporate Banking and Executive Committee Member per the Board of Directors resolution No. 79/1 and dated 18 December 2019. She started her duty as of 1 January 2020.

Corporate Customers Sales Executive Vice President of the Parent Bank, Ebru Sönmez Yanık, has resigned from her duty as of 14 January 2020.

Credits Executive Vice President of the Parent Bank, Gordana Hulina, has resigned from her duty and has been appointed as the Head of Financial Risk Management of ING Belgium and Luxemburg starting from 15 January 2020. Business Lending and Risk Analytics Executive Vice President of the Parent Bank, Öcal Ağar, has been appointed as Credits Executive Vice President and Executive Committee Member per the Board of Directors resolution No. 79/1 and dated 18 December 2019, after completion of the BRSA process, he started his duty as of 15 January 2020.

Section seven

Independent auditors' report

I. Explanations on the independent auditors' report

The consolidated financial statements of the Parent Bank and its financial subsidiaries as of 31 December 2019, have been audited by KPMG Bağımsız Denetim ve Serbest Muhasebeci Mali Müşavirlik A.Ş. (The Turkish member firm of KPMG International Cooperative, a Swiss entity) and the independent audit report dated 7 February 2020 is presented at the beginning of this report.

II. Explanations and notes prepared by independent auditors

There are no other significant footnotes and explanations related to the operations of the Group that is not mentioned above.