

ING BANK A.Ş.
2025 TSRS COMPLIANT
SUSTAINABILITY REPORT

ING





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(Convenience Translation of Auditor's Limited Assurance Report Originally Issued in Turkish)

**LIMITED ASSURANCE REPORT OF THE INDEPENDENT AUDITOR ON THE INFORMATION
PRESENTED UNDER THE TURKISH SUSTAINABILITY REPORTING STANDARDS OF ING BANK
A.Ş. AND ITS SUBSIDIARIES**

To the Shareholders of ING Bank A.Ş.,

We have been assigned to perform a limited assurance engagement on the information ("Sustainability Information") presented in accordance with Türkiye Sustainability Reporting Standards 1 "General Requirements for Disclosure of Sustainability-related Financial Information" and Türkiye Sustainability Reporting Standards 2 "Climate-Related Disclosures", which is included in the "2025 TSRS Compliant Sustainability Report" section of the Sustainability Report of ING Bank A.Ş. and its subsidiaries (collectively referred to as the "Group") for the year ended 31 December 2025.

Our assurance engagement does not include the information related to other information included in the 2025 Sustainability Report and other information (including any images, audio files, website links or embedded videos) associated with Sustainability Information and 2025 Sustainability Report.

Limited Assurance Conclusion

Based on the procedures performed and the evidence obtained, as summarized under the section "Summary of the Work we Performed as the Basis for our Assurance Conclusion", nothing has come to our attention that causes us to believe that the Sustainability Information included in the "2025 TSRS Compliant Sustainability Report" section of the Group's Sustainability Report for the year ending December 31, 2025, has not been prepared in accordance with the Türkiye Sustainability Reporting Standards ("TSRS"), as published by the Public Oversight Accounting and Auditing Standards Authority of Türkiye ("POA") in the Official Gazette dated December 29, 2023 and numbered 32414(M). We do not provide any assurance conclusion regarding the information related to other information included in the 2025 Sustainability Report and any other information (including any images, audio files, website links or embedded videos) associated with the Sustainability Information and 2025 Sustainability Report.

Inherent Limitations in the Preparation of Sustainability Information

The Sustainability Information is subject to inherent uncertainties due to lack of scientific and economic information. The inadequacy of scientific data leads to uncertainties in the calculation of greenhouse gas emissions. Additionally, due to the lack of data regarding the likelihood, frequency, and impacts of potential physical and transition climate risks, the Sustainability Information is subject to uncertainties related to climate-related scenarios.



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Responsibilities of Management and Those Charged with Governance Regarding Sustainability Information

The Group's Management is responsible for:

- Preparing the Sustainability Information in accordance with the principles of Türkiye Sustainability Reporting Standards;
- Designing, implementing and maintaining internal control over information relevant to the preparation of the Sustainability Information that is free from material misstatement, whether due to fraud or error;
- Additionally, the Group Management is responsible for selecting and implementing appropriate sustainability reporting methodologies as well as making reasonable assumptions and suitable estimates.

Those Charged with Governance is responsible for overseeing the Group's sustainability reporting process

Responsibilities of the Independent Auditor Regarding the Limited Assurance of Sustainability Information

We are responsible for the following:

- Planning and performing the engagement to obtain limited assurance about whether the Sustainability Information is free from material misstatement, whether due to fraud or error;
- Forming an independent conclusion, based on the procedures we have performed and the evidence we have obtained; and
- Reporting our conclusion to the Group Management.

Since we are responsible for providing an independent conclusion on the Sustainability Information prepared by management, we are not permitted to be involved in the preparation process of the Sustainability Information in order to ensure that our independence is not compromised.

Professional Standards Applied

We performed a limited assurance engagement in accordance with the Standard on Assurance Engagements 3000 Assurance Engagements other than Audits or Reviews of Historical Financial Information and in respect of greenhouse gas emissions included in the Sustainability Information, in accordance with Standard on Assurance Engagements 3410 Assurance Engagements on Greenhouse Gas Statements, issued by POA.



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Independence and Quality Control

We have complied with the independence and other ethical requirements of the Code of Ethics for Independent Auditors which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior, issued by the POA. Our firm applies Standard on Quality Management 1 and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements. Our work was carried out by an independent and multidisciplinary team including assurance practitioners, sustainability and risk management specialists. We have used the work of our expert team to assess the reliability of the information and assumptions related to the Group's climate and sustainability-related risks and opportunities. We remain solely responsible for our assurance conclusion.

Summary of the Work we Performed as the Basis for our Assurance Conclusion

We are required to plan and perform our work to address the areas where we have identified that a material misstatement of the Sustainability Information is likely to arise. The procedures we performed were based on our professional judgment. In carrying out our limited assurance engagement on the Sustainability Information, we:

- Face-to-face interviews were conducted with the Group's key senior personnel to understand the processes in place for obtaining the Sustainability Information for the reporting period.
- The Group's internal documentation was reviewed and assessed to evaluate the sustainability related information.
- The disclosure and presentation of sustainability-related information have been evaluated.
- Through inquiries, obtained an understanding of Grup's control environment, processes and information systems relevant to the preparation of the Sustainability Information. However, we did not evaluate the design of particular control activities, we did not obtain evidence about their implementation or we did not test their operating effectiveness.
- Evaluated whether Group's methods for developing estimates are appropriate and had been consistently applied. However our procedures did not include testing the data on which the estimates are based or separately developing our own estimates against which to evaluate Group's estimates.



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

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

Aykut Üşenti, SMMM
Partner

12 June 2026
İstanbul, Türkiye

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Introduction

Achieving the United Nations (UN) Sustainable Development Goals (SDGs) is made possible by the transformation of financial systems as well as managing environmental and social impacts. Achieving sustainable development goals in Türkiye, as on a global scale, necessitates the holistic contribution of the public and private sectors, and the financial sector plays a critical role in this transformation. ING Bank A.Ş. and its subsidiaries (also referred to as "ING Türkiye" or "Bank" in the report); in line with its vision of creating sustainable value, shares its Sustainability Report, which has been prepared in full compliance with the Turkish Sustainability Reporting Standards (TSRS) 1 "General Provisions on the Disclosure of Sustainability-Related Financial Information" and TSRS 2 "Climate-Related Disclosures" standards, the "Board Decision on the Scope of Implementation of the Turkish Sustainability Reporting Standards (TSRS)" published in the Official Gazette dated 25 December 2023 and exemptions. With this report; ING aims to transparently disclose ING Türkiye's sustainability and climate performance, governance structure, and strategic approaches, and the disclosures are based on the TSRS published in the Official Gazette as of December 29, 2023, and applicable for annual periods starting from January 1, 2024. Some of the explanations in the report may refer to the global strategies, policies and practices of ING Bank N.V. (referred to as the "ING Group" in the report), of which ING Türkiye is a subsidiary, and unless otherwise stated, all quantitative and qualitative data within the scope of the report belong to ING Türkiye operations. Governance, sustainability strategy, risk and opportunity management, and metric and target setting mechanisms are carried out with a consolidated approach at ING Türkiye and are implemented to include subsidiaries.

Purpose and Scope

This report has been prepared to meet the principles, definitions and disclosure obligations set out under TSRS 1 and TSRS 2. In this context, information on ING Türkiye's climate-related risks and opportunities, which will be useful for primary users of general-purpose financial reports when deciding to fund the business, is included. In line with the purposes of TSRS 1 and TSRS 2; risks and opportunities that can be "reasonably" expected to affect the cash flows, access to finance or cost of capital of enterprises in the short, medium or long term are addressed, thus providing information for primary users. As a result of the evaluations carried out by ING Türkiye, no "significant" climate risk and opportunity was identified for the Bank and its subsidiaries; Risks and opportunities that are evaluated and do not exceed the "materiality" threshold are also disclosed so that primary users can obtain information.

Judgements and Uncertainties

The data presented in this report has been obtained from internal sources of ING Türkiye and its subsidiaries and from third-party data providers whose reliability is accepted. Due to its reliance on measurements and estimates, some information may be approximate and may not be with absolute certainty. ING Türkiye and its subsidiaries aim to ensure the accuracy and reliability of all information contained in the report.

A reasoning process was carried out by considering criteria such as the information used in the selection of guidance sources being based on scientific foundations and being compatible with international standards and best practices. Calculating greenhouse gas emissions, determining the organizational framework and materiality assessment involve a certain reasoning process and calculations may involve limited measurement uncertainty. In addition, the level of detail in customer-based portfolio data, international and national climate policies and legislative developments, publicly available national climate data, uncertainties in the severity and type of climate events are evaluated within the scope of the constraints in scenario studies.

Conceptual Foundations and General Requirements

Information must be transparent, reliable, comparable, verifiable, presented in a timely manner and understandable. Therefore, to make the information in question more useful, compliance with the following conceptual foundations has been observed.

- **Fair Presentation:** The information in the report is presented in a complete, impartial and accurate manner in accordance with the truth. In this context, ING Türkiye declares that the accounting policies used are applied throughout the year and consistent with previous periods and that the data shared are consolidated in accordance with the principles used in the financial statements.
- **Materiality:** Information in the context of sustainability and climate-related financial disclosures is important, if failure to provide, misrepresent or conceal information is reasonably expected to influence the decisions of the principal users of general-purpose financial reports based on these reports, which include financial statements and sustainability/climate-related financial disclosures and provide information about a particular reporting entity. Explanations are provided as to whether there is material information that can reasonably be expected to affect ING Türkiye's future financial adequacy. The threshold value selection has been determined in a framework that will be compatible with the financial reports and has been calculated on the basis of a certain percentage of unconsolidated pre-tax profit in line with the precautionary principle.
- **Reporting Entity:** This report and related financial statements have been prepared by ING Türkiye in accordance with the scope of the financial statements covering ING Bank A.Ş. and its subsidiaries subject to consolidation.
- **Value Chain:** Value chain is a concept within the scope of the TSRS as a set of all activities, resources and relationships related to the business model(s) of the commitment and the external environment in which it operates. For ING Türkiye, the concept of value chain defines the scope of the Environmental, Social and Governance (ESG) risk management life cycle. The value chain includes upstream and downstream actors from the bank's perspective.
 - Upstream: Upstream actors of the business (e.g., suppliers) provide products or services that are used in the development of the business's products or services.
 - Downstream: It covers all indirect sustainability and climate impacts arising from the use of the financial products and services of the business by customers and that may affect

the Bank's financial performance, risk profile and climate targets. This scope: It is handled in a broad framework that includes loan portfolio risks, customer behaviour, climate scenario impacts and regulatory compliance costs.

Value chain segments are mapped to core business areas to reflect ING Türkiye's internal organization. These are defined in Figure 1 according to ING Türkiye's balance sheet and Profit and Loss (P/L) items and are aggregated based on the similarity of business activities through similar products, services offered and actors in the value chain.

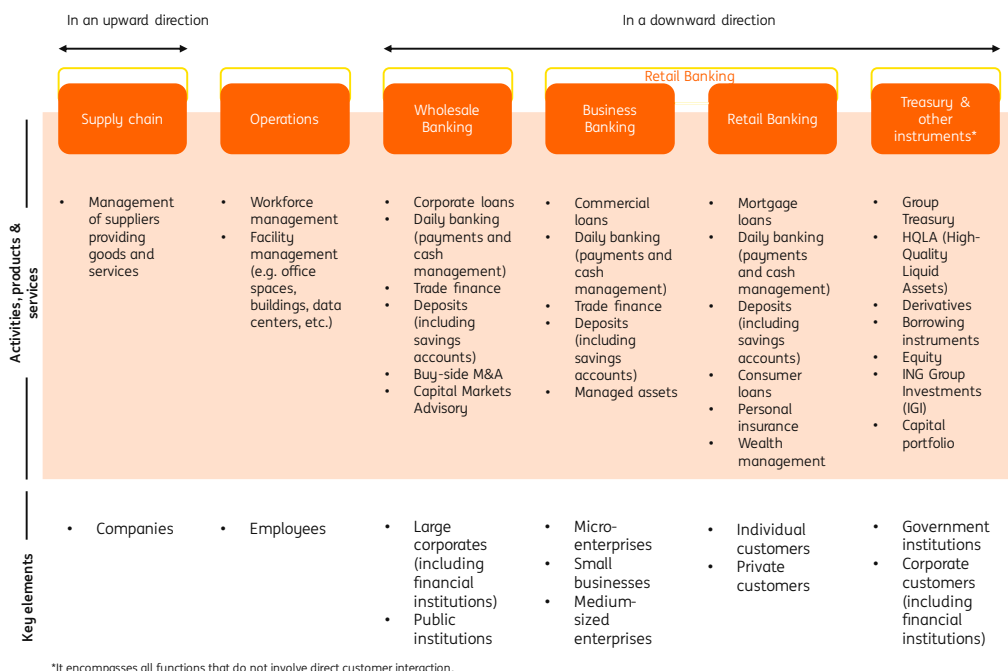


Figure 1 ING Türkiye Value Chain Segments

- Connected Information:** The explanations of governance, strategy, risk management, metrics and targets included in the report are presented in a way that allows primary users to understand the types of connections that are linked to each other. For example, the operational targets for energy efficiency and their performance metrics, resource allocation, and financial impacts were disclosed together to ensure the integrity of the report. In addition, the information contained in the sustainability and climate-related disclosures is also consistent with the general-purpose financial statements prepared within the scope of the Turkish Financial Reporting Standards (TFRS). For example, indicators such as capital expenditures to reduce environmental impacts, revenues for renewable energy products, etc. are compatible with publicly available financial statements. The sustainability and climate-related information provided under the TSRS is discussed in connection with the financial data included in ING Türkiye's BRSA report for 2025, including consolidated data for the 12 months for the accounting period ended 31 December 2025, in order to support a holistic understanding of the current and potential impacts on the Bank's financial position, financial performance and cash flows. The risks and opportunities

included in the report were evaluated in relation to the relevant items in ING Türkiye's financial statements.

- The terminology for the sustainability and climate-related risk and opportunity assessment processes used within the scope of TSRS reporting have been determined in line with the Bank's budget process, medium-term business plan and long-term strategic goal horizons. This approach aims to assess the possible impacts of sustainability and climate-related risks and opportunities on the Bank's strategic decision-making mechanisms and capital planning in a consistent time perspective. Accordingly, ING Türkiye is based on the following time frames in its sustainability and climate-related risk and opportunity assessment processes:
 - Short Term (<3 years): The effects evaluated within the Bank's 3-year budgeting period are considered short-term.
 - Medium Term (3-10 years): The period between short and long term is considered as medium term.
 - Long Term (≥10 years): Effects evaluated over 10 years are considered long-term.
- **Source of Guidance¹:** ING Türkiye applies the Turkish Sustainability Reporting Standards (TSRS) when identifying climate risks and opportunities that are projected to reasonably affect its future financial adequacy. In addition, reference is made to disclosure issues for Commercial Banks under TSRS 2-Annex Volume-16, which is derived from the Sustainability Accounting Standards Board (SASB) Standards maintained by the International Sustainability Standards Board (ISSB); The applicability of these issues in terms of metrics and targets is evaluated. The guidance document in question has been determined by taking into account the activities and materiality judgment of ING Türkiye and its subsidiaries.
- **Timing of Reporting and Method of Publication:** The report is consistent with the reporting period of the 12-month consolidated financial statements covering the period of 1 January 2025 – 31 December 2025. Information for the relevant financial period can be found in the consolidated financial statements of ING Bank A.Ş. for the 2025 accounting period. To ensure consistency across the different reports published by ING Türkiye, the same data sets and assumptions were used in the climate-related financial disclosures presented in this report as in the financial reports for 2025. In this context, the same accounting policies, methods, forecasts and the Turkish lira (TL) as the currency were taken as a basis to ensure harmony between sustainability and climate data and financial information. The report can be accessed via the Public Disclosure Platform (KAP) and www.ing.com.tr/tr/ing/surdurulebilirlik address.

¹ As a result of the evaluation made within the framework of sector-based guidelines within the scope of TSRS 2, it has been determined that the activities defined in Volume 15 and Volume 18 are not within the scope of the Bank's field of activity. Accordingly, explanations regarding the volumes in question are not presented within the scope of this report.

In addition to these, In the preparation of the report, compliance with the following conceptual basis and explanation principles was observed.

- Comparability and consistency
- Timing of reporting
- Risk and opportunity assessment
- Connected information – reporting integrity
- Integration with corporate strategy

Transitional Provisions

The facilitations and exceptions used by ING Türkiye within the scope of the "Transitional Provisions" in TSRS 1 Annex E and TSRS 2 Annex C are explained in this section. The disclosures have been prepared taking into account the provisions of the "Board Decision on the Scope of Implementation of Türkiye Sustainability Reporting Standards (TSRS)" published in the Official Gazette dated 25 December 2025.

- Pursuant to the provisions of TSRS 1 annex E5 and E6, businesses can only disclose information on climate-related risks and opportunities in the first reporting period in which they implement TSRSs and gradually expand the scope in subsequent reporting periods. Since it is the second reporting year of ING Türkiye's TSRS practices, this report is based on explanations on climate-related risks and opportunities, and the scope of the report has been created within the framework of these transitional provisions.
- In line with the provision of Provisional Article 3 of the "Board Decision on the Scope of Implementation of Turkish Sustainability Reporting Standards (TSRS)", businesses are not obliged to disclose their Scope 3 greenhouse gas emissions in the first two reporting periods in which they apply TSRSs. ING Türkiye only includes disclosures on Scope 1 and Scope 2 emissions within the scope of this report.
- Within the framework of Provisional Article 2 of the "Board Decision on the Scope of Implementation of Turkish Sustainability Reporting Standards (TSRS)" (as well as TSRS E4(b)), businesses can report their sustainability reports for the second annual reporting period in which they apply TSRSs after publishing their financial reports for the relevant period. Accordingly, ING Türkiye TSRS Report is published in a manner not exceeding the interim financial reporting date.

Auditing

This report; within the scope of the independent audit required by the Public Oversight, Accounting and Auditing Standards Authority (POA) in accordance with the Turkish Sustainability Reporting Standards published in the Official Gazette dated 29 December 2023 and numbered 32414(M), Güney Bağımsız Denetim ve Serbest Muhasebeci Mali Müşavirlik A.Ş. (EY) has been certified as follows: GDS 3000 "Assurance Audits Other Than Independent Audit or Limited Independent Audit of Historical Financial

Information" and GDS 3410 "Assurance Regarding Greenhouse Gas Disclosures" Audits" standards and a limited independent assurance statement was included in the report.

About ING Bank A.Ş.

ING Bank A.Ş. is the Turkish subsidiary of the ING Group, headquartered in the Netherlands. ING Group; It is an international financial institution that provides banking services in more than 100 countries in Europe, North and Latin America, Asia and Australia.

Although ING officially started its activities in Türkiye in 2008 under the name ING Bank A.Ş., it has been serving in Türkiye since the early 90s. With the acquisition of OYAK Bank in 2007 and ING Bank A.Ş. in 2008, it started to operate under the title of ING Bank A.Ş. and since then, services have been provided in the fields of retail, business and wholesale banking.

ING Türkiye is the 10th largest private² sector bank in Türkiye and provides services with a total of 2231 employees with its Headquarters in Istanbul, 54 branches and subsidiaries spread throughout Türkiye. It offers widespread and uninterrupted banking services to its customers through digital channels, call center and ATM network.

The Bank's business model is shaped by a strategy that focuses on digitalization. ING Türkiye; it aims to provide its customers with accessible, fast and user-oriented digital solutions 24 hours a day, 7 days a week. Digital banking activities are constantly being developed to increase financial inclusion and strengthen customer experience.

ING Türkiye; it continues its activities with strong corporate governance principles, effective risk management structure and an approach based on ethical values. In addition to its practices that support financial sustainability, the Bank also acts with an understanding that considers environmental and social impacts.

ING Bank A.Ş. has 3 financial and 1 non-financial subsidiaries, and the subsidiaries whose financial statements have been consolidated within the framework of the year-end consolidated financial report prepared as of December 31, 2025, are as follows:

- ING European Financial Services,
- ING Finansal Kiralama A.Ş. (Financial leasing services),
- ING Yatırım Menkul Değerler A.Ş. (Securities brokerage services),

These subsidiaries enhance ING Bank A.Ş.'s product and service diversity, support operational efficiency, and contribute to providing integrated solutions tailored to customer needs.

The Sustainability Journey: A Reflection of a Global Vision in Türkiye

² The ranking was made by taking into account the total assets of the sector member bank in the 3rd quarter of 2025.

ING Group's sustainability approach was developed in the early 2000s, focusing on areas such as climate change, resource efficiency, and social impact. In 2017, the commitment to the "Net Zero Banking" principle was announced, aiming to both reduce the operational footprint and support the transformation of the financing sectors.

ING Türkiye blends this global sustainability vision with local needs and integrates sustainability principles into all its business strategies. First of all, sustainability risk assessments were made and these assessments; from customer identification processes to lending activities; ESG criteria and qualitative/quantitative elements are integrated into various areas ranging from risk appetite to stress scenario analysis.

As of 2023, the CBRT focused on the use of renewable energy to a large extent, increased the volume of sustainable financing, and accelerated efforts to reduce environmental impacts. All these steps are reflected in ING's Turkish operations with its vision of "building a more sustainable future for people" set on a global scale and the local motto "sustainability is at the heart of our business".

In 2023, ING Group's operational targets were updated, the base year was redefined as 2023, and it committed to reducing carbon emissions from its own operations by 23% by 2030. This update has put ING's net zero vision on a stronger and more up-to-date foundation.

ING Bank A.Ş. aims for healthy and sustainable growth in the Turkish financial sector; continues its work without slowing down in line with the principles of digitalization, customer focus and sustainability.

1. Governance

1.1. Senior Level Oversight and Organizational Structure in Sustainability

Sustainability is an important part of ING Türkiye's business approach. With its global experience and awareness of the role of sustainability and climate change in its responsible banking approach, the Bank embraces and manages these issues at the highest management level. The sustainability and climate-oriented governance and processes of ING Türkiye's subsidiaries are also covered by ING Türkiye's processes. Therefore, the governance processes described in this section also extend to subsidiaries.

The Board of Directors is responsible for determining and implementing the sustainability and climate strategy of ING Türkiye in Türkiye, monitoring performance, and effectively managing and monitoring risks and opportunities. The Board of Directors ensures that sustainability issues are integrated into the Bank's strategy and that adequate resources and governance infrastructure are provided in this context. All decision-making processes related to sustainability, including the provision of sufficient resources to manage, limit and control the relevant risks, and the approval of the relevant frameworks and policies, are submitted to the final approval of the Board of Directors. The Board of Directors discussed the following issues regarding Sustainability and ESG Risks at the meetings held in 2025:

- ING Türkiye's performance and achievements in 2024 (update)
- New sustainability strategy and key performance indicators and their alignment with sustainability targets (strategy approval)
- Planning for the development of new sustainable products and services (planning approval)
- Progress updates on ESG metrics and goals (update)
- Sustainability and climate-related risk and opportunity assessments (update)
- Double significance analysis results (update)
- Information on compliance with the Good Practice Guidelines on the Management of Climate-Related Financial Risks and inspection findings (update)
- Sustainable finance progress (update)
- YVO, TSRS, etc. legal reporting results and developments (update)
- Within the scope of the ICAAP Report, Climate stress scenario studies and evaluation and approval of the headings of Sustainability, Environmental and Social Risks and Climate Risk
- Determination of Climate Risk Appetite indicators within the scope of Risk Appetite Structure and subsequent monitoring with periodic reports

Decisions on sustainability and climate issues handled by the Board of Directors; It is integrated into business results through strategic planning, product development processes and performance indicators. Sustainable finance targets, operational emission reduction plans and regulatory compliance projects are reflected in the action plans of the relevant business units and are regularly monitored.

The internal governance mechanism for sustainability and climate risk is built on a multi-layered structure.

| Board Of Directors | Corporate Governance Committee | Risk Committee |
|---|--|--|
| Ensures the establishment of an effective organizational structure for the integration of ESG into the company and corporate strategy, and the provision of adequate resources to effectively manage, mitigate and control ESG risks. It is responsible for the approval of the framework and policies related to ESG risks | Oversees sustainability actions and ESG risks. | The committee in charge of assessing the ESG risk policies and frameworks and managing ESG risks. |
| Executive Committee | Sustainability Committee | Risk Management Committees |
| Determines the relevant actions in line with the Bank's sustainability strategy. | It is in charge of monitoring and steering the Bank's sustainability targets by contributing to strategic decision-making processes involving determining the Bank's sustainability direction/strategy and priorities | Decisions related to ESG risks are assessed at different risk committees such as the Credit Risk and Provisions, Non-Financial Risk and ICAAP Committees. |
| Programme Leader: Sustainability Department | Business Lines - Officers | ESG Risk Coordination: Financial Risk Management |
| <ul style="list-style-type: none"> Carries out sustainability initiatives. Leads the transformation in sustainability. Acts as the Bank's sustainability advisor. Coordinates sustainability practices. | <ul style="list-style-type: none"> At least Vice President/Director level Performs and coordinates sustainability related responsibilities and PTAs. Reports on the progress in sustainability KPIs on a quarterly basis. | ESG risk is defined not as an independent risk category/type but as a series of factors affecting the likelihood and severity of existing risk categories/types. ESG risk can affect financial and non-financial types of risk. In this scope, Financial Risk Management performs effective and comprehensive risk management activities in the responsibility areas of Financial Risk Management, Non-Financial Risk Management and Compliance Risk Management. |

Figure 2 ING Bank A.Ş. Sustainability Governance Structure

Corporate Governance Committee; is responsible for sustainability actions and oversight of environmental, social, governance (ESG) and climate risks. The Risk Committee evaluates the Bank's other risks, as well as policies and frameworks related to ESG, and climate risks and oversees the management of these risks. Receiving and evaluating the opinions and suggestions of the Senior Management regarding the relevant risks is also carried out by risk committees specializing in different fields under the supervision of the Risk Committee. All issues related to risk management, including the determination of risk appetite, are resolved by the Risk Management Committees, to be submitted to the approval of the Board of Directors when necessary. The job descriptions and responsibilities of the committees are reviewed and updated in line with changing needs and regulatory requirements.

Sustainability Committee

The Sustainability Committee's main responsibility is to manage the Bank's sustainability direction and goals. The Committee is also responsible for monitoring and guiding the Bank's sustainability goals, contributing to strategic decision-making processes, such as setting its sustainability and climate strategy, commitments, relevant key performance indicators (KPIs), and priorities. The main sustainability and climate indicators monitored by the committee are; sustainable finance mobilization figures, Scope 1 and Scope 2 emissions from operations, brand perception indicators in the eyes of consumers regarding the Bank's performance in the field of sustainability, employee satisfaction results and employee training investments. The additional duties and responsibilities of the Committee, which are also stated in the "Sustainability Committee Terms of References" document, are as follows:

- To establish clear ownership, accountability, resource allocation and priorities within the organization to help identify and implement ING Türkiye's sustainability commitments,
- To include ING Türkiye's sustainability commitments in ING Türkiye's business strategy, profitability, operations, processes, systems, financials and reporting and to ensure that these are in line with ING Türkiye's sustainability commitments,

- To ensure that ING Türkiye is compliant with both the requirements of the ING Group and local and international (sustainability-related) regulations, including sustainability-related disclosures, reporting and assurance,
- Appoint appropriate officials to represent ING Türkiye in other sustainability-related committees both within ING Türkiye and within the ING Group,

To provide quarterly updates to the Board of Directors on sustainability and climate-related information. In 2025, the Sustainability Committee made strategic assessments for the development of the Bank's sustainable finance product portfolio and determined sustainable It was decided to prioritize product and service areas. In line with this decision, increasing the volume of sustainable financing has been integrated into strategic planning processes.

The Committee also regularly monitored sustainable finance performance indicators and evaluated developments regarding sustainable finance volume and related ESG metrics. These monitoring activities contributed to strengthening the alignment between the Bank's sustainability goals and its business strategy.

Analyses of climate-related opportunities were discussed on the agenda of the Committee.

Risk Committee

It is the committee that oversees the management of ESG risk by evaluating policies and frameworks related to ESG risk. In addition, decisions regarding ESG risks; it is evaluated by different risk management committees such as the Credit Risk and Provisions Committee, the Non-Financial Risk Committee, and the ICAAP (Internal Capital Adequacy Assessment Process) Committee. ESG Risk Appetite monitoring results are also periodically reported to the Board of Directors and the Risk Committee.

Studies and methodologies related to sustainability and climate risks, which are in responsibility of the Risk Committee, are detailed under the title of Risk Management.

The Sustainability Department provides quarterly information to the Risk Committee. Thus, the integration of sustainability elements into risk management processes is strengthened.

Sustainability Department

In December 2023, the Sustainability Division was established and approved by the Organizing Committee. The Sustainability Department, reporting to the General Manager, who is responsible for the ownership of ING Türkiye's sustainability transformation according to regulatory and policy requirements; It has been authorized to formulate, implement and monitor the performance of the Bank's sustainability strategy. In this context, the department:

- It contributes to the relevant business lines regarding the process of identifying sustainability and climate-related risks, and works on identifying opportunities,
- Within the scope of ESG Risk Management, it undertakes the function of the 1st line of defense,
- Directs the Bank's compliance and transformation process by following regulatory and market developments,

- Coordinates with business units in sustainable finance product development processes,
- It monitors sustainability performance indicators and provides periodic reporting to the relevant committees, and,
- It coordinates data collection, consolidation and disclosure processes within the scope of TSRS and similar reporting frameworks.

The team is also involved in representation activities such as national and international sustainability working groups, non-governmental organizations (NGOs), and events. In the light of monitoring national and international regulations, policies and market dynamics, and regulatory and market expertise/knowledge in the field of sustainability, ING Türkiye helps to provide consultancy and guidance support to its teams. The Sustainable Finance Department was established under the Sustainability Department, which reports directly to the General Manager and functionally to the Wholesale Banking Executive Vice President (EVP), and this team carries out the Bank's activities in the field of Sustainable Finance.

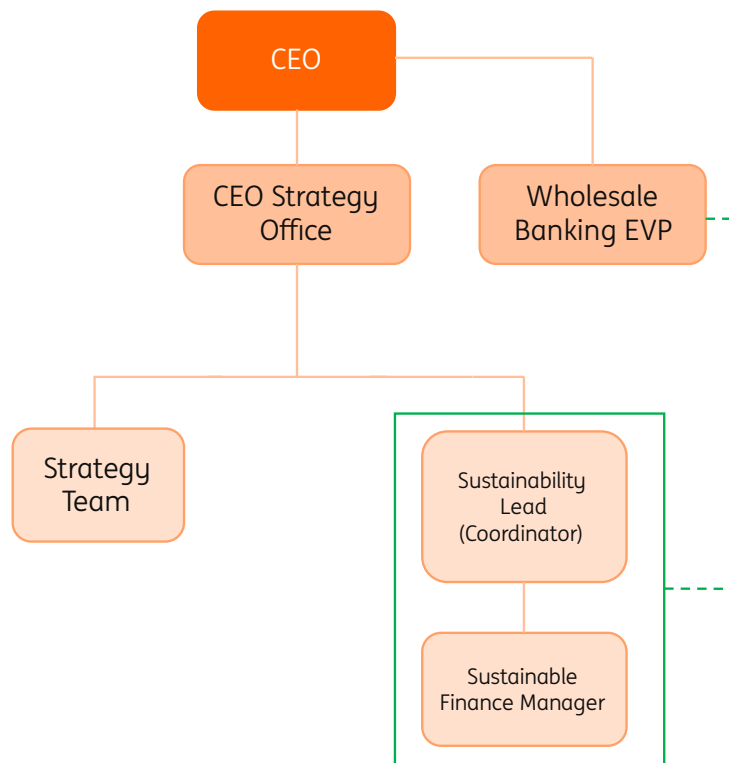


Figure 3 Operational Ownership of Sustainability

Terms of Reference, Mandate and Competence

Integrating sustainability goals into corporate strategy and managing them effectively requires the presence of leadership staff with advanced competencies in this field. Senior executives within ING Türkiye's management structure contribute to the organization's vision of creating long-term value with their knowledge and experience in areas such as sustainable finance, climate-oriented strategies and energy transformation.

Canan Ediboğlu, Vice-Chair of the Board of Directors of ING Türkiye, contributes to the studies carried out at the international level as a member of the World Resources Institute and the Global Relations Forum (GRF) Energy Working Group, which operate in the field of sustainability. Similarly, Semra Kuran, Member of the Board of Directors and Chair of the Audit Committee of ING Türkiye, continues to work in the field of sustainability as a member of the board of directors of the World Resources Institute (World Resources Institute), which operates in the field of sustainability, at the international level and in the country as the Chair of the Sustainability Working Group of the Finance Executives Foundation of Türkiye, and continues to work in the field of sustainability at the master's level in the field of sustainable finance carried out academic research. Karst Jan Wolters, a member of the Board of Directors and Chairman of the Risk Committee, is simultaneously a member of the ESG Board of ING Germany.

Sustainability and climate-related tasks and responsibilities are clearly defined in committee terms of reference, regulations, and internal policy documents. Members of the Sustainability Committee have the authority and responsibilities to consider both sustainability and climate risks and opportunities according to their job descriptions. The assessment capacity of committee members on sustainability and climate issues; the performance evaluation system, which is carried out twice a year, is strengthened by the analyses provided by the relevant expert units and regular information processes. Subject-specific training and information sessions are organized when deemed necessary. In addition, information and evaluation sessions are organized for senior management in order to keep the knowledge and competencies on the subject up to date. In the session held for the Sustainability Committee in 2025, current regulatory developments, risks and opportunities in the field of sustainability were discussed by an independent industry expert and evaluated with senior management.

The Sustainability Department: It consists of 3 professionals with in-depth expertise in areas such as sustainable finance, regulatory compliance and sustainability strategy. The team plays an active role in setting corporate sustainability goals, developing relevant policies and practices, and coordinating communication with internal and external stakeholders.

Risk Management is responsible for identifying, evaluating, and monitoring environmental and social risks in line with the corporate risk framework. The Bank's ESG Risk coordinator carries out effective and comprehensive risk management activities in the areas of responsibility of Non-Financial Risk Management, Compliance Risk Management and Internal Control with its Financial Risk Management unit. In this context, Risk Management oversees the implementation of relevant methodologies, policies and processes and monitors the operability of control mechanisms in order to ensure that different risk policies

and climate and environmental risks are managed in line with risk appetite under the umbrella policy within the scope of the ESG Risk Framework and Policy. ING has a well-defined, transparent and consistent management structure with lines of responsibility in managing ESG risk. The ESG risk and control structure is based on the triple line of defense model, which provides the foundation for the organization and implementation of the ESG risk management structure.

1.2. Governance Processes

Sustainability-related issues are systematically integrated into ING Türkiye's decision-making processes, and evaluations in these areas are regularly taken into account in strategic and operational decisions. In this context, risks and opportunities, especially related to climate change; it is reflected in basic business decisions such as determining strategic goals, product and service development, and loan allocation processes. In the decision-making process, there may be trade-offs between environmental impact and commercial goals. In such cases, the relevant decisions are evaluated by the Sustainability Committee. Prioritization is made by considering environmental impacts, legal obligations, reputational risk and financial sustainability criteria. Similarly, there may be a trade-off between growth in credit activities and climate risk. The Bank evaluates this trade-off with the approval of the Board of Directors and the Climate Risk Appetite limits determined under the supervision of Risk Management in line with its strategic objectives and taking into account climate risk factors.

Responsibilities regarding ESG governance are determined within the scope of the Bank's ESG Risk Framework, approved by the Board of Directors, and are reviewed at least 1 time per year.

- **The Board of Directors** is ultimately responsible for approving the ESG risk framework and policies, effectively embedding sustainability governance into the corporate structure, and allocating the necessary resources.
- **The Corporate Governance Committee** ensures managerial integrity by monitoring strategic developments and risks in the field of sustainability at a high level.
- **The Risk Committee** evaluates policies and frameworks related to ESG risks and oversees the process for identifying, measuring, and managing these risks.
- **Each of the committees, such as the Credit-Risk and Provisions, Non-Financial Risk, ICAAP and Asset-Liability Committees**, is responsible for evaluating ESG risk factors within the framework of their own mandate and making relevant decisions.

Within the scope of monitoring sustainability and climate-related risks and opportunities, progress is regularly monitored, and sustainability performance is monitored through indicators such as sustainable finance mobilization figures, operational emissions (Scope 1 and Scope 2), and portfolio indicators related to transition risk. Progress results regarding these indicators are periodically reported to the relevant committees and action plans are updated when necessary.

Risk preferences and assessment criteria are defined in line with the Bank's risk management framework; Risk appetite, limits and thresholds are reviewed at regular intervals. The corresponding evaluation and approval processes are concretely used in applications, e.g. new product evaluations, credit policy updates or sector-based risk analyses.

Within the scope of the reporting processes carried out by the committees, monitoring outputs regarding sustainability and climate risks are periodically communicated to the Sustainability Committee, the Board of Directors, the Corporate Governance Committee and the Risk Committee; thus, current risk and opportunity assessments are taken into account in decision-making processes.

The Sustainability Department, reporting to the CEO is responsible for implementing sustainability policies, monitoring sustainability performance, and ensuring coordination across the organization. The team has expertise in areas such as sustainable finance, strategic planning, and regulatory compliance.

Within the scope of early evaluations, improvements are observed in terms of increasing internal awareness, holistic ownership of targets and establishing regular data flow thanks to the Sustainability Department. It is seen that the Sustainable Finance Department supports increasing sustainability capacity.

ESG risk is defined not as an independent risk category/risk type, but as a set of factors that affect the likelihood and severity of existing risk categories/risk types. Climate risk is evaluated within the environmental risks category within the scope of ESG. ESG risk can affect financial and non-financial risk types. In this context, it carries out effective and comprehensive risk management activities in the areas of responsibility of Financial Risk Management, Non-Financial Risk Management, Compliance Risk Management and Internal Control. Under the Risk Committee, the Credit Risk Control, Risk, Capital and Reporting Division under Financial Risk Management is a special unit responsible for identifying, assessing and managing climate and environmental risks as **the ESG Risk Coordinator**. This team ensures that ESG risks are handled in an integrated manner within the framework of corporate risk appetite; it also supports the implementation of policies and methodologies. Duties and responsibilities regarding ESG risk management are reviewed at least once a year within the scope of the relevant risk policies and job descriptions documents and submitted to the approval of the Board of Directors.

This holistic governance structure demonstrates that ING Türkiye addresses sustainability and ESG risks not only as a regulatory requirement but also as a fundamental building block of its long-term value creation strategy. Thanks to this structure, which is integrated into decision-making processes, the Bank is able to manage environmental and social impacts holistically; at the same time, it exhibits a transparent and accountable corporate stance that meets stakeholder expectations. Timely identification and effective management of ESG risks not only increase financial resilience; it also serves as a strategic lever for the bank to achieve its sustainable growth and transformation goals.

Information Processes and Frequency

At ING Türkiye, the Board of Directors and senior management are regularly and need-oriented informed about sustainability and climate-related developments. These information processes are structured to support strategic decision-making processes and ensure compliance with regulatory expectations.

In this context;

- **The Board of Directors** is regularly briefed at least four times a year on topics such as sustainability and climate-related risks and opportunities, sustainability strategy and related targets and action plans, sustainability governance and regulatory developments. In 2025, a total of 4 briefings were provided at regular meetings of the Board of Directors, covering the specified topics. Within the framework of risk management, the results of the ICAAP Report in the minimum annual period and the Climate Risk Appetite in the monthly period are presented to the information of the Board of Directors. In addition, special purpose reporting is carried out in line with developing legal regulations and market conditions.

At the meetings held in 2025, the Board of Directors was presented with analyses on the sustainable finance product portfolio, market potential and positioning of the Bank, and as a result of the evaluations, it was confirmed that sustainable finance mobilization should be monitored as a strategic priority. At the same time, the selection of auditors for TSRS sustainability reporting was approved by the Board of Directors, thus strengthening the assurance infrastructure of the reporting process. In addition, as a result of the evaluation of the "Good Practice Guide for the Management of Climate-Related Financial Risks" by the Board of Directors, the relevant units were requested to monitor the compliance status. Developments regarding the implementation of the Board of Directors' decisions are periodically monitored through the relevant committees.

- **The Corporate Governance Committee** is briefed at quarterly meetings to monitor and guide the sustainability agenda at a senior level. The Corporate Governance Committee is provided with up-to-date information on strategy and compliance with regulations. Information was provided by participating in four meetings held in this context in 2025.
- Within the scope of the Sustainability Action Monitoring Table, which was brought to the Committee's agenda throughout 2025; the realization status of sustainability actions, the effects of legislative developments on the Bank and the progress regarding new product studies were evaluated. The Committee exercised its managerial oversight role regarding the continuation of progress in line with the sustainability strategy and the follow-up of the identified priorities.
- **The Risk Committee** is periodically informed about ESG risks and developments regarding the management of these risks, and reporting is structured to support the oversight role of this committee. In addition, the Risk Committee is provided with up-to-date information under the headings of strategy and compliance with regulations. Information was provided by participating in three meetings held in this context in 2025.

Throughout 2025, sustainability and climate-related financial risks were regularly brought to the Risk Committee's agenda. Committee; The CBRT was briefed on the Green Asset Ratio, the TSRS reporting process and the developments within the scope of the "Good Practice Guidelines for the Management of Climate-Related Financial Risks".

- Within the framework of risk management, the results of the ICAAP Report in the minimum annual period and the Climate Risk Appetite in the monthly period are also presented to the Board of Directors and the Risk Committee. In addition, special purpose reporting is carried out in line with developing legal regulations and market conditions when necessary.
- As a result of the evaluations, it was requested to analyse the effects of regulations such as the Climate Law, carbon tax and Emission Trading System on the portfolio. Work on this issue continues by field teams.
- **The Executive Committee** members are informed about periodic developments within the scope of the integration of sustainability strategies with operational processes; it ensures that sustainability risks and opportunities are taken into account in strategic decisions.
- **The Sustainability Committee** was established in 2023 to monitor and guide the bank's sustainability strategy at a senior level. The committee consists of 10 members and meets four times a year to evaluate the sustainability agenda. In four meetings held throughout 2025, information was provided on the sustainability strategy, compliance with regulations, risk and opportunity analyses, and performance indicators. In line with ING Group's net zero target, the Committee has put priorities such as operational emission reduction, sustainable finance mobilization and strengthening of data infrastructure on its agenda. In addition, sustainability performance was monitored through dashboards; critical indicators such as financing volume, transition risk, Scope 1-2-3 emissions, employee satisfaction and training investments were included in these panels. For 2026, the committee's priority agenda includes diversification of sustainable financing products, reduction in operational emissions, improvement of data methodology and in-house capacity building programs.

In addition to the aforementioned periodic information processes; in line with legal developments, market risks or strategic needs, special purpose assessments are also provided to the relevant boards and committees by the Sustainability Department. Thanks to these structures, the integration of the sustainability and climate agenda into the governance structure is carried out systematically and effectively.

Controls and Procedures in Governance Processes

The management implements various control mechanisms and procedures for the management of risks and opportunities related to sustainability and climate. In this context, climate-related risk indicators have been integrated into the Bank's risk appetite framework, and Climate Risk Appetite indicators are presented to the Financial Risk Management and Credit Management studies and the Risk Committee and the Management Committee for approval and oversight. Surveillance activities of sustainability and climate-related risks and opportunities are carried out through a coordination mechanism established between sustainability, risk, credit and finance teams. In this context, sustainable finance performance, greenhouse gas emission data, risk ratios of risky sectors are reviewed. ESR assessment is integrated into the customer acquisition and review processes, and relevant risk factors are taken into account in these processes.

Within the scope of the ICAAP Report, climate stress scenarios are checked by the Internal Audit, Internal Control and Model Risk (validation) Teams.

While integrating sustainability and climate-oriented risks and opportunities into its strategic decision-making processes, ING Türkiye has structured its governance in this area based on the Three Lines of Defense (3LoD) model.

First Line of Defense (1LoD)

First Line of Defense (1LoD) ING Türkiye's business units and support functions have primary ownership, accountability and responsibility for assessing, controlling and mitigating all financial and non-financial ESG risks affecting their business and ensuring that financial statements and risk reports are complete and accurate. In this context, business units responsible for sustainable finance processes take into account environmental and social risk factors, from customer identification processes to lending activities; Operations and finance teams monitor performance in line with the targets set on issues such as carbon emissions and energy efficiency. In addition, the purchasing unit is responsible for implementing criteria for suppliers' environmental compliance. The first line of defense, as the first layer where risk is identified and controlled, plays a proactive role in managing sustainability risks.

Second Line of Defense (2LoD)

The Second Line of Defense (2LoD) are functions in risk management. 2LoD is responsible for:

- To oversee, monitor, advise, question the first line of defense regarding ESG risk management (including compliance) and to have escalation/veto power regarding activities and decisions that are considered to pose unacceptable risks to ING Türkiye.
- Translating ESG risk appetite into methodologies, frameworks and policies and controlling their execution and implementation in order to support and monitor business management to control ESG risk.
- Objectively interrogate ESG risk management implementation and control processes and coordinate the reporting of ESG risks and controls by the first line of defense.

Activities related to Risk Management [are detailed in Section 3](#).

Third Line of Defense (3LoD)

Board of Inspection 3 is responsible for the Third Line of Defense. In this context, it is responsible for conducting both risk-based and general audits and ensuring to the Board of Directors that the integrity of the entire governance structure, including the risk governance structure, and the existence, effectiveness and implementation of policy and implementation principles are examined. Accordingly, environmental and social risk assessments are examined within the scope of loan process audits. Climate risk analysis studies, which are the subject of the internal capital assessment process, are audited.

Thanks to this multi-layered structure, ING Türkiye approaches sustainability risks not only from a compliance perspective, but also from a strategic management approach; thus, it ensures long-term value creation in line with the principles of transparency, accountability and effectiveness.

1.3. Performance and Remuneration Policy

Sustainability and climate-related targets are integrated into the retail performance targets of the relevant senior management. These goals are reflected in the performance evaluation system and remuneration processes, aiming to increase sustainability awareness throughout the organization. Sustainability and climate-related targets are integrated into the retail performance targets of the relevant senior management members in line with their roles and responsibilities. In this context, different sustainability metrics are included in the performance evaluation system within the framework of each manager's area of responsibility. Targets such as sustainable finance mobilization figures, emissions from operations and female employee representation rates are among the performance targets. These targets are measured during the performance evaluation process carried out twice a year; The level of realization affects the premium and wage increase processes. Progress and development towards the targets are monitored through the metrics in the Sustainability Committee dashboards. With the clarification of the sustainability strategy in the transition from 2024 to 2025, the scope of KPI has been more clearly defined; Sustainability indicators are structured within the framework of measurable targets. In the same period, dashboards were set up to monitor sustainability performance and the frequency of monitoring was increased. Sector-based risk appetite indicators regarding sustainable finance volumes, operational emission data and transition risks are regularly discussed at the Sustainability Committee level. Thanks to this structure, sustainability performance is handled in an integrated manner in both managerial decision-making processes and retail performance evaluation mechanism

Through the sustainability-related KPIs of the Sustainability Department, it is measured whether the strategy is acted upon, and performance evaluations are made twice a year. All of the Sustainable Finance Manager's performance targets are related to sustainable finance volume growth, and approximately 50% of the sustainability leader's performance targets consist of sustainability metrics and cover compliance with sustainable finance, emissions and regulations. In the 2025 performance period, the realizations towards these sustainability targets were completed at the expected level and reflected in the performance evaluation results. For teams outside the Sustainability Department, the sustainable financing volumes of the Business Banking and Wholesale Banking teams are measured, and the carbon footprint arising from the bank's operations is calculated and the performance of the relevant teams is periodically evaluated based on these metrics. Scope 1, 2 and 3 (air and road transport) targets are

followed for sustainable finance targets and emissions from operations. In addition, the target to maintain the 50% level of female employees and to increase the ratio of female employees at the management level is followed by the Human Resources (HR) side and the relevant teams are evaluated twice a year with this KPI.

In Risk Management, there are targets related to ESG Risk Management in the performance indicators of managers who have responsibilities/activities within the scope of ESG risk and are evaluated twice a year.

2. Strategy

ING Türkiye's business model shaped by its sustainable and responsible banking approach; it goes beyond economic benefit and focuses on environmental and social sustainability. Instead of focusing only on economic growth, the bank; adopts a more inclusive and responsible development approach with a focus on people, nature and the planet, and aims to be one of the pioneers of this transformation. Acting with the principle of "sustainability is at the heart of our business", ING Türkiye works determinedly to build a sustainable future, especially in combating the climate crisis and strengthening financial health. From this point of view, ING Türkiye; it addresses sustainability and climate risks and opportunities in a holistic manner in terms of strategic planning, value creation and competitive advantage, beyond the obligation to adapt. As in all risk management processes, it evaluates risks and opportunities related to sustainability and climate at certain term intervals in line with the planning periods used in strategic decision-making processes. These Terminations are presented in Table 1. This section describes the risks and opportunities that may affect the decision-making processes of the primary users of the report, as well as the current and planned actions for them.

All evaluations include subsidiaries included in ING Türkiye's consolidated financial statements. However, no additional significant risks or opportunities have been identified arising from the activities of these subsidiaries that would require them to be included in the scope of the report.

| Term | Term Description | Description |
|--------------------|------------------|--|
| Short Term | <3 years | The impacts assessed within the Bank's 3-year budgeting period are regarded as short-term. |
| Medium Term | 3-10 years | The period between short- and long-terms is regarded as medium term. |
| Long Term | ≥10 years | The impacts assessed over 10 years are regarded as long term. |

Table 1 Time Horizons Used for Assessing Sustainability and Climate-Related Risks

In order to support sustainability and climate-oriented transformation in ING Türkiye's business model and value chain, the application of ESG criteria in supplier selection and evaluation has also been integrated into decision-making processes. In addition, customers' sustainability transformations are evaluated, and efforts are increased to actively support customers in their transition to a low-carbon economy according to these plans. From this point of view, the current and projected impacts on ING Türkiye's business model and value chain are taken into account in the assessment of risks and opportunities; areas of influence such as geographical density and asset type are taken into consideration. Identified opportunities; It focuses on financial assets (credit), physical assets (branch infrastructure, vehicles) and relational assets (customer and supply chain) and has the potential to create tangible effects in product development, credit allocation, procurement, human resources and operational efficiency processes. Potential concentration areas/assets of risks are [discussed in detail in the risk tables in](#) Section 2.1.

The assessments are not limited to impact assessment but also cover the Bank's current and planned responses to these risks and opportunities. In particular, plans for achieving climate-related targets and fulfilling legal requirements are considered as an important part of responses to climate risks and opportunities in strategic decision-making processes. In addition, the potential effects of these risks and opportunities on the Bank's financial position, performance and cash flows are evaluated in the short, medium and long term; how these effects might evolve over time is also being analyzed.

Both direct and indirect impacts are taken into account in determining risks and opportunities, and all of the Bank's activities are evaluated in the context of ESG and climate. Detailed information on the risk management approach [is given in Chapter 3](#).

Within the framework of "materiality" in paragraphs 17-19 of the TSRS; businesses are required to disclose material information regarding sustainability-related risks and opportunities that can reasonably be expected to affect their future financial adequacy. In order to use definitions compatible with the conceptual framework of TSRS, the materiality threshold value selected for ING Türkiye and determined to be compatible with the financial audit process has been determined by taking into account a certain proportion of pre-tax profit as well as qualitative materiality, in line with the expectations in paragraphs B13-B37 of TSRS 1.

Within the scope of the financial materiality assessment carried out in the current reporting period, sustainability-related risks and opportunities were analyzed separately. In the assessment, it was determined that the opportunity to provide financing for renewable energy investments created a revenue impact above the financial materiality threshold set by the Bank. These revenues are considered as financial opportunities that positively affect the Bank's short and medium-term cash flows.

However, these financial effects were realized through the income statement items and it was assessed that the carrying values of the assets and liabilities reported in the financial statements did not constitute an impairment or uncertainty indicator that would require adjustment as of the reporting period. Details of other risks and opportunities addressed within the scope of the assessment are presented below.

2.1. Climate-related Risks and Opportunities

Climate Risks

In line with its sustainability strategy, ING Türkiye classifies climate-related risks as transition and physical risks and comprehensively addresses these risks within the framework of potential impacts on its business model, business strategies, value chain and financial performance. The risks in question are evaluated across short-, medium-, and long-term time horizons and are integrated into strategic planning, lending processes, and operational activities. This section discusses the Bank's exposure to climate-related risks and the practices followed for the management of these risks. Detailed information on the risk management approach [is given in Chapter 3](#).

In addressing risks and opportunities; current and anticipated changes in ING Türkiye's business model (such as plans to manage or retire carbon, energy or water-intensive operations; resource allocations resulting from demand or supply chain changes; resource allocations resulting from business development through capital expenditure or additional expenditure on research and development, and acquisitions or divestitures) are also taken into account, including resource allocation.

| Risk No | 1 |
|---|--|
| Risk definition | Know Your Customer: Risks that may arise if customers are not compliant with the Bank's operating principles in terms of ESG and climate risks and/or are involved in sensitive sectors: Customer profile and field of activity may be incompatible with sustainability commitments. |
| Place in the value chain | Customer evaluation phase in customer acceptance and credit allocation processes – banking and wholesale banking customer portfolio |
| Risk category | Transition Risk (Policy changes, reputational risk, compliance with regulations) |
| Maturity | Short – Medium – Long Term |
| Impact on business model and value chain | In line with the Know Your Customer Principle in all maturities, customers in prohibited or sensitive sectors determined within the scope of combating climate change will be excluded from financing or evaluated within the framework of certain conditions. This may lead to the limitation of the Bank's business model in certain sectors. As of the reporting period, there were no significant impacts, and projected impacts include the possibility of customer churn. In this context, in addition to the increase in operational expenses, the decrease in interest income due to the indirect and indirect decrease in loan volume and also the effects of reputational risks come to the fore. It was evaluated at the medium risk level within the scope of the probability-impact assessment. This risk is effectively managed with the processes and control mechanisms established in the bank. Thus, the risk level is monitored at a low level. |
| Impact on strategy and decision-making processes | Within the framework of the Environmental and Social Risks Procedure, it plays a decisive role in customer acceptance, credit allocation and financing decisions. Strategic portfolio management is being reshaped according to sustainability criteria. |
| Climate-related transition plan/Planned actions | Before establishing a customer relationship, the environmental-social risk level is determined according to the thresholds determined on a sectoral basis and ING Group standards; In high-risk situations, customer onboarding and financing processes are subject to re-evaluation. The process is reviewed periodically. In the past period, updates were made in country risk thresholds. |
| Impact on financial position, financial performance and cash flows³ | In 2025, over 4,600 customers underwent environmental and social risk assessments within the framework of the Know the Customer Principle. Prohibited activities and positions in sensitive sectors were rated with the Environmental and Social Risk (ESR) score; This score is integrated into credit evaluation processes. This has the potential to affect the structure of the financing portfolio and the risk/return balance in the future. It did not have any material impact on the financial statements in the current period. Possible effects include the possibility of loss of interest income due to customers who do not work due to know your customer. |
| Resilience and scenario analyses | Risk is managed through policy sets developed by ING Türkiye against transition risks and is subject to scenario-based evaluations, taking into account the customer portfolio, field of activity and sector distribution. Analytical studies will be integrated into ESG scoring systems, which are |

³ Since the said risk is below the materiality threshold as a result of the impact assessment, it has not been included in the financial impact disclosure.

planned to be carried out at a more granular level in the future. In the current reporting period, no issues have been identified that could significantly affect the resilience of ING's strategy and business model to climate-related changes, developments and uncertainties. Therefore, there is no need for additional efforts such as the use of additional financial resources, restructuring or decommissioning of assets, and investment planning.

| Risk No | 2 |
|---|---|
| Risk definition | Lending processes: Deterioration in the operations of customers operating in sectors that are significantly affected by or significantly affected by climate change during the transition to a low-carbon economy, and exposure of the collateral of the companies to which financing is provided to climate-related physical risks |
| Place in the value chain | Lending processes |
| Risk category | Migration Risk vs. Physical Risks |
| Maturity | Short – Medium – Long Term |
| Impact on business model and value chain | Climate and ESG risks are an integral part of the Credit Risk Appetite determination process. Risk appetite limit levels were defined and approved by the Board of Directors for the portfolio with high emission potential for new disbursements within the scope of the transition risks assessment for the commercial (in the wholesale and business segments) loan portfolio on the basis of 6 main sectors and for the retail loan portfolio specific to housing loans. Compliance with the limits is regularly monitored and reported. In the short and medium term, loan growth in related sectors will be evaluated within the scope of risk appetite, and the share of portfolios with high emission potential is expected to decrease in the long term. In this context, financial and strategic effects come to the fore. It was evaluated at the high risk level within the scope of the probability impact assessment. This risk is effectively managed through the processes established in the bank, control mechanisms and risk appetite monitoring. Thus, the risk level is monitored at a medium-low level. |
| Impact on strategy and decision-making processes | The risk of default arising from deterioration in customer activities or the possibility of a decrease in bank revenues are integrated into lending activities; climate risks are included in the risk appetite determination process in line with the Bank's strategic planning. Climate-related physical risks are also taken into account in collateral strategies. Risk assessment of transition and physical risks is among the key elements of the customer-based lending process in the business and wholesale segments. |
| Climate-related transition plan/Planned actions | Key risk indicators related to physical risks in housing loans are regularly monitored and reported to senior management. Analyzing ESG and climate-related risks in client lending activities, evaluating factors that may affect exposure to climate risks (e.g., transition risk probability based on sector-level emission intensity, assessment of collateral regarding transition risk) and factors that may affect client financial performance. In the lending and collateral processes, riskiness, insurance conditions and risk mitigation factors are taken into account in terms of physical risks such as earthquakes, landslides, floods and fires. In line with the risk appetite limits set for loan disbursement in sectors with high emission potential, the portfolio structure is shifted to areas of activity with lower climate risk. Risk appetite is reviewed annually. In this period, more conservative thresholds have been determined compared to the previous year. |

| Risk No | 2 |
|---|---|
| Impact on financial position, financial performance and cash flows⁴ | Transition and physical risks have the potential to have a financial impact in connection with collateral valuations and loan repayment risks. It did not have any material impact on the financial statements in the current period. It is anticipated that if the material levels of the assessed risk effects increase, loan provision expenses may increase, and may affect the capital adequacy ratio due to the increase in customers' loan provisions and the decrease in the value of the collaterals received. |
| Resilience and scenario analyses | Sector-based risk appetite limits and portfolio-based risk indicators used in lending decisions are structured by taking into account transition and physical risk scenarios. In this context, factors such as the possibility of default and collateral depreciation in high-emission sectors are subject to scenario-based analyses; Physical risk indicators are regularly monitored, especially in retail products such as housing loans. In the medium term, it is aimed to develop analyses in order to increase the resilience of the loan portfolio against climate scenarios. In the current reporting period, no issue has been identified that could significantly affect the resilience of ING Türkiye's strategy and business model to climate-related changes, developments and uncertainties. Therefore, there is no need for additional actions such as the use of additional financial resources, restructuring or decommissioning of assets, and investment planning. |

⁴ Since the said risk is below the materiality threshold as a result of the impact assessment, it has not been included in the financial impact disclosure.

| | |
|---|--|
| Risk No | 3 |
| Risk definition | Business Continuity: Risks that may affect business continuity, such as the cessation of bank operations and damage to the data center as a result of climate-based natural disasters |
| Place in the value chain | Operational processes, data center management, critical service infrastructure |
| Risk category | Physical Risks |
| Maturity | Short – Medium – Long Term |
| Impact on business model and value chain | Impact assessments of issues such as natural disasters that may affect business continuity are carried out on a location basis, and risk measures are prioritized in critical locations. It is envisaged that the effects of natural disasters that may occur in the short and medium term will be limited, and effective management of operational losses will be ensured in the long term. In this context, operational effects come to the fore. ING Türkiye carries out customer transactions through channels such as branches, internet branches, mobile branches, call centers, ATMs and POS. Business continuity issues in these channels have the potential to affect customers' ability to receive service through these channels, leading to operational risks such as inability to provide service and reputational risk. It was evaluated at the medium risk level within the scope of the probability-impact assessment. This risk is effectively managed with the processes and control mechanisms established in the bank. Thus, the risk level is monitored at a low level. |
| Impact on strategy and decision-making processes | Business continuity risk at ING Türkiye locations is analyzed in terms of climate-based disasters. Detailed assessments were made within the scope of risks such as excessive rainfall, drought, forest fire, extreme heat, landslides and water stress; the measures to be taken in these areas were evaluated on a location basis. Following these evaluations, ING Ankara Head Office was established in order to make backups regarding the bank's critical business processes, and a sufficient number of personnel were employed in the center specified for this purpose. In the risk assessment study carried out on Maslak Headquarters, Istanbul Ümraniye Primary Data Center, Kahramanmaraş Operations Center, Ankara Headquarters Center, Izmir Secondary Data Center and ING Technology locations; climate-based risks such as excessive rainfall, drought, fire, extreme heat, landslides, water stress were taken into account. |
| Climate-related transition plan/Planned actions | ING Türkiye prioritizes climate-based physical risks that may affect business continuity on a location basis and implements action plans customized according to the type of risk. Scenario analyses were updated last year. For water stress; There are measures determined as water use efficiency and saving, rainwater harvesting work, stakeholder participation and cooperation, water risk assessment and planning, diversification of water resources, sustainable resource use and supply chain management, water pricing and internalization of cost, and investment in innovation and technology. For heat stress; There are measures such as heat reduction in workplaces, hydration stations, flexible work schedules, training and awareness, installation of cooling systems, break and rest areas, green areas and employee health support. |

| Risk No | 3 |
|--|--|
| | <p>For fire; There are measures related to defensible area and landscaping, fire barriers and fire-resistant materials, fire prevention training, emergency response planning, early warning systems, firefighting equipment, vegetation management, community engagement, employee communication and support, evacuation drills, forest fire monitoring and forecasting.</p> <p>For drought; There are relevant measures for water use efficiency and conservation, rainwater harvesting, stakeholder engagement and cooperation, water risk assessment and planning, diversification of water resources, sustainable sourcing and supply chain management, water pricing and cost internalization, and investment in innovation and technology.</p> <p>For landslides: There are measures related to landslide risk assessment, slope stabilization and engineering, structural strengthening, early warning systems, employee training, safe equipment and assets, comprehensive emergency response planning, post-landslide rescue plan, insurance and risk transfer.</p> <p>For excessive rainfall: There are measures related to effective stormwater management, maintenance of drainage systems, flood barriers and protection, emergency response planning, employee safety training, backup power and utilities, waterway management, insurance, and risk transfer are in place.</p> |
| <p>Impact on financial position, financial performance and cash flows⁵</p> | <p>According to climate-related case studies conducted as of 2025, there is no significant business continuity disruption, and no significant interruption is expected in the future. Although there is no significant financial impact in the current period, an increase in operational expenses is projected.</p> |
| <p>Resilience and scenario analyses</p> | <p>Business continuity risks arising from climate-based natural disasters are assessed with location-based scenarios within the scope of ING Türkiye's operational resilience approach. Scenarios based on events such as extreme weather events, earthquakes, and fires are integrated into the plans based on both past case studies and probability-based analyses. In the current reporting period, no issue has been identified that could significantly affect the resilience of ING Türkiye's strategy and business model to climate-related changes, developments and uncertainties. Therefore, there is no need for additional actions such as the use of additional financial resources, restructuring or decommissioning of assets, and investment planning.</p> |

⁵ Since the said risk is below the materiality threshold as a result of the impact assessment, it has not been included in the financial impact disclosure.

| Risk No | 4 |
|---|---|
| Risk definition | Bank operations: Operational and strategic risks within the scope of physical risks and transition risks that the Bank may be exposed to or cause within the scope of its own activities. |
| Place in the value chain | Internal operations, building and branch infrastructure, energy consumption, material usage, real estate portfolio. |
| Risk category | Transition and Physical Risks |
| Maturity | Short – Medium – Long Term |
| Impact on business model and value chain | Factors that reduce operational efficiency or increase carbon footprint in the short to medium term may conflict with long-term sustainability goals. In this context, operational and strategic effects come to the fore. It was evaluated at the low risk level within the scope of the probability-impact assessment. This risk is effectively managed with the processes and control mechanisms established in the bank. |
| Impact on strategy and decision-making processes | ING Türkiye sets its priorities in areas such as reducing emissions from its own operations, energy efficiency, and sustainable infrastructure transformation. Factors such as the expenses created for the purpose of reducing risks and the evaluation of assets purchased or disposed of within the scope of mitigation measures, if any, are taken into consideration; investments and energy transformation plans are shaped within this framework. |
| Climate-related transition plan/Planned actions | Energy efficiency investments, green building transformations, improvements to reduce direct operational emissions, and optimizing resource use. |
| Impact on financial position, financial performance and cash flows⁶ | <p>Emission reduction, infrastructure renewal, energy transformation investments and asset management changes may create investment costs in the short term; however, it is possible to positively affect the financial balance by providing energy savings, efficiency and adaptation gains in the long run. As of 2025, no significant investments have been made. However, reductions made within the scope of location optimization continue to reduce the carbon footprint.</p> <p>In 2026, the charging stations to be established in the Maslak main building within the scope of the use of electric vehicles will increase electricity consumption and will not have an additional impact on emissions due to the use of green energy.</p> <p>In this context, the financial impact is limited in the short term and there is a risk of increase in operational expenses due to energy consumption. In the medium and long term, a positive impact on financial performance is expected thanks to the decrease in fossil fuel consumption.</p> |
| Resilience and scenario analyses | In the current reporting period, no issue has been identified that could significantly affect the resilience of ING Türkiye's strategy and business model to climate-related changes, developments and uncertainties. Therefore, there is no need for additional efforts such as the use of additional financial resources, restructuring or decommissioning of assets, and investment planning. Realized and planned system change investments are part of the Bank's climate adaptation strategy. |

⁶ Since the said risk is below the materiality threshold as a result of the impact assessment, it has not been included in the financial impact disclosure.

| Risk No | 5 |
|---|--|
| Risk definition | Compliance with Legal Regulations: The risk that the bank will not be able to comply with the laws, regulations and policy documents that have been enacted or are expected to be enacted on climate change in a timely and effective manner. In particular, examples of legislation such as sustainability reporting, sustainable finance, green asset ratio, and Climate Law are among the critical compliance issues. |
| Place in the value chain | Bank operations: Compliance, sustainability strategy, reporting, credit policies, data infrastructure, portfolio classification. |
| Risk category | Transition and Physical Risks (due to secondary effects) |
| Maturity | Short – Medium – Long Term |
| Impact on business model and value chain | Failure to comply with regulations in all maturities may have an impact on the Bank's investor confidence, legal obligations, sustainable financing capability and brand image/reputation. Additionally, a lack of data or a lack of methodology can lead to setbacks in ESG strategies. In this context, regulatory and strategic influences come to the fore. It was evaluated at the high-risk level within the scope of the probability-impact assessment. This risk is effectively managed with the processes and control mechanisms established in the bank. Thus, the risk level is monitored at a low level. |
| Impact on strategy and decision-making processes | ING Türkiye evaluates and closely follows the developments regarding national and international legislation such as TSRS 1-2, European Green Deal (EGD), Carbon Border Adjustment Mechanism (CBAM), Climate Law, Green Asset Ratio, together with process integrations. Thus, the integration of legal regulations into strategy and planning is ensured. |
| Climate-related transition plan/Planned actions | <p>In the future, it is aimed to expand the impact analyses to include reporting in accordance with TSRS 1 and TSRS 2. In this context, it is aimed to complete the studies in line with the ING Group methodology and relevant legislation, especially in the calculation of financed Scope 3 portfolio emissions. Relevant studies have been initiated in 2025.</p> <p>In addition, studies on prominent issues in national legislation such as the calculation of the Green Asset Ratio, the Guideline on Managing Climate-Related Financial Risks, and the Climate Law are evaluated, as well as the holistic integration of processes into the bank and their effects on strategies. In terms of financial impacts, the integration of the ESG factor into credit risk models is considered an important development area in terms of following international good practice examples and developing modelling techniques.</p> |
| Impact on financial position, financial performance and cash flows⁷ | <p>With the CBAM, which started to be implemented in the transition period within the framework of the EGD published by the European Commission, it is envisaged that carbon pricing will be applied to products imported to the European Union (EU) based on greenhouse gas emissions released during their production processes.</p> <p>Although the effects of CBAM prices on the loan repayment capacities of customers whose main field of activity is cement, electricity, fertilizer, iron and steel and aluminium production and who export to the EU are not directly measured, they are indirectly considered within the scope of risk assessment processes established within the scope of bank lending activities, general climate risk assessments, sector-based observations and credit assessments</p> |

| Risk No | 5 |
|---|--|
| | <p>made on a customer basis. These sectors are managed within the limits of sensitive sector assessments and/or climate risk appetite in bank risk processes.</p> <p>It is foreseen that regulatory data requirements, especially regarding ESG and climate risks, will increase in the coming period, and data procurement and system investments and methodology transformations made / to be made for compliance with different regulations may create operational costs.</p> |
| Resilience and scenario analyses | <p>In the current reporting period, no issue has been identified that could significantly affect the resilience of ING Türkiye's strategy and business model to climate-related changes, developments and uncertainties. Therefore, there is no need for additional actions such as the use of additional financial resources, restructuring or decommissioning of assets, and investment planning. In terms of climate risk, risk management elements such as international and national legislative developments, data supply, modelling techniques are closely monitored, and processes are developed. It is envisaged that there will be regular developments in steps such as conducting analyzes under scenarios of implementing climate regulations at different speeds and scopes and using these scenarios in determining the internal strategy according to data preparation capacity, portfolio breakdown and financial impact level.</p> |

⁷ Since the said risk is below the materiality threshold as a result of the impact assessment, it has not been included in the financial impact disclosure.

Climate-related Opportunities

Within the scope of its sustainability strategy, ING Türkiye adopts the proactive and systematic evaluation of not only risks but also emerging opportunities as a priority element. Opportunities evaluated in this context; It was shaped by the findings obtained from the materiality analyses and the predictions from the business units and was structured in a framework compatible with the Bank's strategic priorities. Areas of opportunity; It has been transformed into concrete actions on topics such as the development of sustainable financing products, energy efficiency investments, supporting low-carbon technologies and increasing operational efficiency. These areas constitute an important component of ING Türkiye's sustainable growth vision; ING is included in Türkiye's long-term strategic roadmap and builds the basis for future actions in line with priority topics.

Climate-related opportunities have the potential to have an impact on ING Türkiye's business model and value chain, both in the current situation and in the medium term. With the diversification of sustainable financing products, access to new customer segments is facilitated in addition to providing financing opportunities for existing customers. For suppliers in the value chain, purchasing processes are shaped by ESG criteria. A climate-compatible operating model is being adopted through practices such as increasing energy efficiency in operations and reducing business travel.

| Opportunity no | 1 |
|---|---|
| Opportunity definition | Financing for Renewable Energy: Supporting the global energy transition by financing solar, wind, and other renewable energy investments. |
| Place in the value chain | Loan portfolio, investment banking products |
| Maturity | Short Term |
| Impact on business model and value chain | To align with the bank's sustainability goals by expanding its sustainable finance products and to gain a strong position in the sector |
| Impact on strategy and decision-making processes | Financing renewable energy projects is a priority in ING Türkiye's sustainable finance strategy. In this context, product development studies were accelerated. In the coming period, it is planned to set specific targets for these projects, expand the green financing product range and integrate sustainability criteria into decision-making processes more systematically. |
| Planned actions | <ol style="list-style-type: none"> 1. Identifying sustainable financing targets to be provided directly or mediated 2. Aligning funding criteria with local and international taxonomies, legislation, and standards 3. In order to take advantage of opportunities in the field of sustainable finance, ING Türkiye aims to increase the volume of sustainable financing in its business banking portfolio by 5%-20% by the end of 2027 compared to the base year 2025. In Wholesale Banking activities, no additional changes are foreseen within the scope of the solo balance sheet. |
| Impact on financial position, financial performance and cash flows | Creating new credit and investment opportunities that will provide long-term returns, attracting local and international funding agencies. In this context, an increase in loan interest and commission income is expected in the financial statements. In this context, in the 2025 reporting period, sustainable finance activities; cash loan income amounting to TL 309,533,075 and cash loan commission amounting to TL 13,154,750 were obtained from business customers, and cash loan income amounting to TL 524,050,784 was obtained from wholesale customers. These revenues remained above the bank's threshold for 2025. |

| Opportunity no 2 | |
|---|--|
| Opportunity definition | Optimizing Business Travel: Aligning with ING's Net Zero 2035 goal by reducing operational emissions and energy consumption through optimized business travel and efficiency improvements. |
| Place in the value chain | Internal operations, transportation policy |
| Maturity | Medium Term |
| Impact on business model and value chain | Reducing operational costs; Emission reduction through accelerating the transition to green energy |
| Impact on strategy and decision-making processes | Implementation of policies to align with ING Group objectives |
| Planned actions | <ol style="list-style-type: none"> 1. Reorganization of flight and vehicle policies 2. Policies that reduce business travel and monthly monitoring of air travel by senior management through dashboards 3. Providing vehicle support instead of company vehicles |
| Impact on financial position, financial performance and cash flows⁸ | The decrease in electricity and travel expenses is expected to provide cost advantages. |

| Opportunity no 3 | |
|---|--|
| Opportunity definition | Increasing Energy Efficiency: Reducing operating costs by turning to energy-efficient buildings and infrastructure in line with sustainable goals. |
| Place in the value chain | Internal operations, branch infrastructure |
| Maturity | Short and Medium Term |
| Impact on business model and value chain | Improving the sustainability performance of the bank's physical operations |
| Impact on strategy and decision-making processes | In line with the goal of zero emissions from our own operations, switching to more efficient systems such as automation and monitoring systems in operational activities |
| Planned actions | <p>Energy-efficient insulation applications and equipment changes</p> <p>Increasing efficiency by replacing all heating systems in the General Directorate</p> |
| Impact on financial position, financial performance and cash flows⁹ | It is aimed to provide long-term cost advantages by reducing operational expenses in financial statements. |

⁸ Since the said risk is below the materiality threshold as a result of the impact assessment, it has not been included in the financial impact disclosure.

⁹ Since the said risk is below the materiality threshold as a result of the impact assessment, it has not been included in the financial impact disclosure.

| | |
|--|--|
| Opportunity no | 4 |
| Opportunity definition | Financing for Electric Vehicles: Meeting the need for financial support created by the increasing interest in electric vehicles |
| Place in the value chain | Loan products, automotive sector collaborations, green financing portfolio |
| Maturity | Short Term |
| Impact on business model and value chain | Diversifying green financing products and aligning with the bank's sustainability goals to improve product development and increase access to new customer segments. This opportunity is important in terms of increasing product diversity in line with the bank's green financing strategy, supporting environmentally friendly transportation and providing financial convenience for the green transformation in the automotive sector. Through loan products, it is aimed to acquire new customers, diversify the product portfolio and increase low-risk loan opportunities. |
| Impact on strategy and decision-making processes | Concrete steps are planned to be developed in line with the group strategy, such as contributing to green transformation through financing for clean fuel vehicles and expanding cooperation in the automotive sector. |
| Planned actions | <ol style="list-style-type: none"> 1. Providing green loans to companies for the transition to an electric vehicle fleet 2. Offering electric vehicle loans to retail customers |
| Impact on financial position, financial performance and cash flows¹⁰ | To increase revenue in existing customers with fleet conversion and retail vehicle loans; While creating additional revenue potential by attracting new customer segments, it is aimed to support environmental impact and green transformation, promote environmentally friendly transportation, contribute to the transformation in the automotive industry and create a positive financial impact by acquiring new customers. |

¹⁰ Since the said risk is below the materiality threshold as a result of the impact assessment, it has not been included in the financial impact disclosure.

Resource Allocation, Investment, and Financing Approach within the Scope of Climate-Related Risks and Opportunities

In line with the targets set for climate-related risks and opportunities, resource allocation is handled with a prioritized approach in ING Türkiye's strategy and decision-making processes. Within the scope of transition, regulatory and credit-related climate risks, limiting or conditioning new financing decisions in sectors with high emission potential or sensitive sectors are implemented as part of strategic portfolio management within the framework of the Bank's risk appetite and credit policies. This approach supports gradual portfolio transformation in certain areas of operation, and no separate scheme requiring asset divestment or retirement as of the reporting period is foreseen.

Resource allocation for physical and business continuity risks is mainly carried out through improvements to increase location-based operational resilience, energy efficiency practices and investments that support the continuity of critical infrastructure. Investments within this scope are handled within the scope of operating expenses and maintenance and repair budgets rather than large-scale capital expenditures and are implemented gradually.

On the other hand, within the scope of climate-related opportunities, the Bank's investment approach is mainly based on providing financing for renewable energy, electric vehicles, energy efficiency and sustainable infrastructure projects. These opportunities are seized through the Bank's loan portfolio and sustainable financing products. The planned financing in this context is met through existing balance sheet resources, domestic and international sustainable finance funding facilities, and the methodology and financing frameworks provided by the ING Group.

As a result, the resource allocation, investment types and financing sources envisaged for the implementation of targets for climate-related risks and opportunities; as of the reporting period, it does not require a sudden or significant disposal, asset depreciation or additional large-scale capital allocation in the Bank's financial structure; It is managed within the framework of existing strategic portfolio management, operational investments and sustainable finance activities.

3. Risk Management

3.1. Integration of Sustainability and Climate Risks into General Risk Management

Bank; It operates within the scope of a series of systems and procedures in order to identify, monitor, report and manage the risks that may arise from its activities. Significant risks within ING are actively measured (where appropriate), monitored and managed through policies and supportive procedures approved by the Board of Directors.

The Bank attaches due importance to the dissemination of risk awareness, and it is the responsibility of all relevant bank personnel to identify the risk. The Board of Directors and the committees established under the Board of Directors, senior management, internal and external audit and risk management units undertake the task of defining risk.

There are several generally recognised risks in everyday business operations, including credit and market risk and operational risks. These risks are managed by special policies, procedures and limits that limit these risks.

The risk management strategy implemented in the bank is based on the triple line of defense model. Business lines, which are the first line of defense, have a primary level of responsibility in terms of performance, operations, compliance and effective control of risks affecting the business line itself. Risk Management, which is the second line of defense, supports the first line of defense within the framework of measurement, implementation, training, advice, monitoring and reporting.

Within the scope of providing independent evaluation and assurance, the Board of Inspectors constitutes the third line of defense. Within the framework of this strategy, the activities of these defense lines; It is carried out through several decision-making committees such as the Executive Committee, Asset and Liability Committee, Credit Risk and Provisions Committee and Non-Financial Risk Committees.

Based on both the international experience of the ING Group and the responsible risk management approach from the past in its own activities, ING Türkiye integrates the effective management of sustainability-related risks and opportunities into its general risk management processes. ESG risks; are defined as risk factors that may affect the probability and severity of risk types such as credit, market, funding, liquidity, operational and compliance, and are evaluated within the scope of the integrated risk management approach. For this reason, ESG risks, including climate risk within the scope of environmental risks, are considered as components of existing risk types, rather than being independent risk categories.

3.2. Identification and Assessment of Risks

ING Türkiye has implemented its processes for identifying, evaluating, prioritizing and monitoring ESG and climate risks; corporate risk appetite is structured in line with national and international regulations. In this context, risk classification methodologies, stress tests, transition and physical climate risk analyses, collateral assessments and ESG-oriented risk policies are implemented, risk appetite limits integrated with the Bank's strategies, different committee and senior management reporting and risk monitoring activities are carried out.

ING Türkiye operates through a comprehensive risk management framework and integrates risk management into its day-to-day operations and strategic planning. This structure ensures that risks at all levels of the organization are identified, measured and controlled, thus maintaining the financial resilience of the ING Group. Identifying and assessing these risks is key to ING's resilience. The Risk Identification and Assessment Process is evaluated within the scope of the ICAAP Report on a minimum annual basis in line with the relevant risk policies and submitted to the Board of Directors for approval.

Risk appetite is one of the important factors in managing risk at the Bank. The Bank's Risk Appetite Structure ensures that a common risk language is created throughout the organization and that the Senior Management and all employees are provided with a comprehensive but concise risk appetite view. At the same time, risk management approach, practices and risk appetite indicators according to functional risk areas are specialized for each risk type. Risk Appetite guides the Bank's risk culture and sets limits in risk-taking activities.

Within the scope of the Bank's Risk Appetite Structure, limits are regularly reviewed not less than once a year in line with the Bank's strategic planning. Limits are approved by the Board of Directors and monitored through quantitative and qualitative-based risk metrics. Risk Appetite is determined within the framework of the Bank's Procedures and Policies, and the roles and responsibilities in the process are determined in these documents. At the same time, the daily risk management approach, practices and risk appetite indicators according to functional risk areas were determined in the Bank Risk Appetite Structure document for each risk type.

Risk identification and assessment stages are shaped according to ING Türkiye's strategies. In addition to external factors such as markets, intra-sector competition and legal changes, ING Türkiye's mission is shaped in line with its strategic priorities and medium-term plan. Risk identification and assessment processes can be inward-looking for some regular activities of risk units, as well as more comprehensive processes.

The implementation of risk appetite is carried out through risk appetite indicator limits, regulations, procedures and timely, accurate and comprehensive reporting to the Senior Management.

The integration of significant climate-related financial risks into the bank's risk management processes is essential. ESG risk (including climate risk) is defined as a set of factors that affect the likelihood and severity of existing risk categories/risk types, not as an independent risk category/risk type. In this context, it is evaluated within other types of risk rather than a prioritization approach among other types of risks. Risks exposed mainly in terms of credit risk, market risk, liquidity risk and operational risks due to climate-

related financial risks are included in the risk management life cycle in accordance with the principle of materiality.

ESG risk is defined as any adverse financial and/or non-financial impact on ING from the current or future impacts/liabilities of ING's value chain and the resulting Environmental, Social and Governance factors. Environmental risks refer to any negative financial and/or non-financial impact caused by environmental factors. Environmental risks, including climate risk, include physical risk and transition risks. Social risks refer to any negative financial and/or non-financial impact resulting from current or future social factors that affect society, employees, customers, and all stakeholders. Governance risks refer to any financial and/or non-financial negative impact arising from governance factors throughout the value chain.

In the Climate-Related Risks table under heading 2.1, the following matrix is taken into account in the impact probability analyses. Other risk methodologies/approaches regarding climate and ESG risks are given below.

| | | Probability | | | |
|--------|------------|-------------|----------|----------|----------|
| | | Very Rare | Unlikely | Possible | Likely |
| Impact | Critical | High | High | Critical | Critical |
| | Important | Medium | High | High | Critical |
| | Medium | Low | Medium | Medium | High |
| | Negligible | Low | Low | Low | Medium |

Figure 4 Risk Matrix

Metrics related to material risks in terms of non-financial risks (operational resilience, data management, service procurement, fraud, etc.) It is associated with ESG risks. It is taken into account within the scope of different assessments such as climate-related environmental changes, operational risk effects on bank physical assets, and business continuity. ESG risks, when evaluated in terms of operational risks, are important factors affecting the bank's daily activities, processes, and sustainability. While operational risks often arise from disruptions in processes, human errors, systemic problems, and external events, ESG factors can significantly change the nature and impact of these risks. Environmental factors include physical and regulatory risks that can directly impact companies' operations. Social factors include elements such as employee rights, occupational health and safety, and customer relations. Corporate governance risks are related to company governance, ethical standards, and compliance with regulations. ESG risks can change the structure of operational risks, create new types of risks or complicate existing

ones. Integrating ESG risks into operational risk management processes helps minimize risks and ensure long-term sustainability.

Assessments are made within the scope of ICAAP in terms of market risk and liquidity, and their effects remain limited in terms of the materiality principle due to the portfolio structure. A climate risk scenario covering physical and transitional climate risks has been defined as a separate scenario within the framework of the Liquidity Stress Test. Under this scenario, ensuring that the Net Liquid Position remains positive for at least 12 months has been identified as a key metric within the bank's risk appetite.

Climate and Environmental Risks are an integral part of ING's Credit Risk Appetite determination process. Climate and Environmental Risks encourage risk assessment in line with ING Group's Terra approach but focuses on the roadmap of sectors that contribute to a lower carbon rate. It also aims to reduce potential climate and environmental risks by taking into account the data of the Carbon Accounting Financing Partnership (PCAF). The Climate Risk Appetite is approved by the Board of Directors and reviewed at least 1 time per year. The results of the Risk Management monitoring are reported monthly to the Board of Directors, Credit Risk and Provisions Committee, and quarterly to the Risk Committee.

The ESG Risk Framework and Policy has been approved by the Board of Directors. The ESG Risk Framework defines ESG risk; it has been prepared to provide an overview of the governance structure that supports the management of ESG risk, as well as the various roles and responsibilities related to ESG risk. The ESG Risk Policy outlines ING's approach to effectively identifying, assessing, mitigating, monitoring, and reporting Environmental, Social, and Governance risks based on its ESG risk appetite.

The ESG Risk Framework refers to both climate-related and environmental risks, which include physical risks and transition risks:

Physical risks are caused by the physical effects of climate change on businesses' operations, workforce, markets, infrastructure, natural resources and assets. Physical risks from climate change can be event-driven (acute), such as the increasing severity of extreme weather events (e.g., hurricanes, droughts, floods, and fires). They may also be related to longer-term (i.e., chronic) changes in precipitation and temperature, and increased variability in weather cycles (e.g., sea level rise). Environmental risks include water-related risks, resource scarcity, biodiversity loss, and pollution and waste, among others.

Transition risks; It is driven by policy, regulation, technology and market changes in the transition to a lower carbon global economy. Transition risk also includes "idle asset risk" – the impairment of carbon-intensive assets that can quickly become unusable or devalued. Transition risks include policy constraints on emissions, the implementation of a carbon tax, water restrictions, land use restrictions or incentives, market demand and supply shifts, and reputational considerations.

The Bank integrates the process into its business strategies by conducting customer/credit/sector assessments within the scope of the Procedure for ESG ("ESG") Risks in Credit Assessment for Business and Wholesale Banking. Environmental, social and governance risks (ESG) assessment, including climate, has become a part of business and wholesale companies' customer acquisition, proposal and periodic review processes. In addition to sector and location information, this assessment is made according to the ESG Risks Procedure for Business Banking and Wholesale Banking and the ESR Procedure for Business

Customers, based on the results of the research conducted by the branch/business line about the companies and the answers given by the companies to the questions asked in this context.

For all wholesale banking customers, regardless of product, sector and credit limit, the ESG Risk assessment is carried out through the steps of "ESG Risk Customer Assessment – Key Element 1" (formerly known as Key ESR Review), "ESG Risk Transaction Assessment – Key Element 2" and "General Assessment – Key Element 3" (formerly known as Full ESR Review). Basic Element 1; While it covers the controls of prohibited activity, country risk, sensitive sector and company lists, the Equator Principles are taken into account in addition to the Basic Element 1 review in the Basic Element 3 Review. The result of the assessment is classified into "Low", "Medium", "High" or "Unacceptable" risk categories.

For wholesale banking customers, the Core Element 2 assessment includes ESG factor assessment such as climate risks (including transition risk and physical risks), environmental impacts, human rights compliance, supply chain relationships, and reputational risk assessment. Within the scope of ESG factor assessment, the degree of materiality and risk level for each ESG factor is measured and risk-reducing measures (mitigations) applicable to each ESG factor above a certain materiality and risk level are provided. The result of the Key Element 2 assessment is classified into the risk categories of "(Very) Low", "Medium", "High" and "Very High".

As a result of the Basic Element 1-2-3 steps, which include wholesale banking ESG controls, the final risk score of the transaction is determined and actions such as detailed examination processes, seeking risk mitigation measures within the scope of the identified risks, consulting sector policies, obtaining expert opinion or not entering into a business relationship are taken according to the calculated consolidated result.

ESG Risk Assessment is carried out for all business banking customers, regardless of the sector in which they operate and their credit limit. ESG Risk review includes prohibited activity, country risk, sensitive sector and firm lists checks. In addition, the "ESR Self-Assessment" process is applied for customers who are within the ESR Sensitive Sectors and are above certain limit thresholds determined in the procedures. With this assessment, the risk levels of the customer are determined under different headings, especially within the scope of standards in sectors that are considered sensitive activities.

In business banking, climate and environmental risk assessments are also carried out for transactions and customers above certain limit thresholds determined in the procedures, depending on the credit limit. This evaluation is a customer-based evaluation process based on industry and location information. The final physical and transit risk scores are calculated by evaluating the answers to the question sets presented to the customers, the relevant mitigation information, and the customer's financial capacity.

Individuals and organizations outside the scope of ESG review include central banks, public authorities, financial institutions and retail customers. However, if the public authority is a direct borrower, beneficiary or addressee of the guarantee in an asset subject to the loan, a detailed ESG review is carried out regarding the project; relevant suppliers and contractors are also included in the evaluation process.

The consolidated ESG Score, which emerges as a result of all these evaluations carried out for both wholesale and business banking, is used as a determining factor in loan allocation decisions. For

transactions with medium and high-risk scores, additional examination, reporting and special conditions are requested. In transactions considered as "Unacceptable", loans are not disbursed in line with the policies.

For business customers who receive a high-risk or "non-compliant" score in the customer-based Climate and Environmental Risk Assessment (Physical and Transition risk), a worsening of the customer's risk rating may be applied, although it does not have a direct effect on the loan allocation process.

ESG risks, including climate, are systematically analysed in loan allocation processes; Evaluations for Retail, Wholesale and Business customers differ according to customer segment, field of activity and transaction/product type.

For Wholesale Banking's customers, the minimum requirements for assessing climate-related risks (physical and transition risks) are the relevant sector policy, the direct impact of the firm's activities and the sector on climate risk, as well as the impact of climate risk on the company's operations, the location of the project and the borrower, the maturity of the loan and mitigating circumstances.

In the business segment, environmental and climate risk (physical risk and transition risk) assessments are carried out at the customer and mortgage level. Environmental and climate risk assessments at the customer level are included in the credit evaluation and allocation processes.

Based on the results of the materiality assessment carried out in the portfolio of Retail Banking loan products, assessments based on environmental or climate risks, especially housing loans, are made. In this context, solutions have been developed to mitigate the physical risks that may be exposed to climate-related activities and integrated into the relevant loan allocation practices. Again, in parallel with the materiality assessment, portfolio monitoring is carried out with analyses based on the energy identity class of the housing loan portfolio for climate-related transition risk.

Compliance Risk Management has published the Guideline on the Prevention of Greenwashing Risks. The purpose of this Guide; to provide a guide to prevent the risks of "greenwashing" that may be created by sustainability statements made during product/service development, communication/branding studies and strategy development. In addition, the assessment of environmental, social and management risks and impacts of products and services is integrated into the product approval and review process. Within the scope of ING Türkiye's customer-centric approach, the Greenwashing Risk Prevention Procedure was prepared and approved on January 10, 2025, in order to effectively manage bank-wide risks related to Greenwashing and to determine minimum standards for the obligations to be fulfilled. In May 2025, the Physical and Transition Risks Guide in Housing Loans within the Scope of Customer Focus was published to provide guidance on how to reduce physical and transition risk within the scope of customer orientation for retail customers in product development, sales activities and communications.

Within the scope of the Integrated Management System (ISO 14001 Environment and ISO 50001 Energy efficiency standards), Senior Management Reporting is carried out by the Internal Control Department through on-site Branch controls and Internal Control Activity Reports. In addition, different control points have been determined within the scope of bank policies and procedures regarding ESG risks.

Within the scope of market and liquidity risk, risk analysis and stress tests are carried out in different scenarios related to climate risks. In addition, analyses on interest and liquidity are carried out in risk assessment processes. Liquidity climate scenarios are also taken into account in risk appetite. Parallel and non-parallel interest rate risk scenarios determined within the scope of interest rate risk arising from banking accounts have been determined to include climate risk.

Climate scenario analyses are made within the scope of operational risk and shared in the ICAAP Report. In terms of Non-Financial Risks, there are explanations regarding ESG risks within the scope of different policies.

While determining sustainability and climate-related opportunities, ING Türkiye's current business model, value chain, operational processes, ING Group's sustainability strategic priorities, and ING Türkiye's product portfolio were evaluated in line with strategic priorities. In the evaluation process, One-on-one meetings were held with each internal stakeholder and initiative plans were taken, and these initiatives were evaluated in terms of compliance with national and international regulations, sustainable financing practices and corporate goals. In this context, potential effects; financial, operational, reputational and regulatory dimensions were discussed, and the contribution of relevant opportunities to the business model was examined.

In prioritizing the opportunities, each opportunity was analysed within the framework of financial contribution potential to ING Türkiye, reputational impact, level of regulatory compliance, social benefit and strategic alignment criteria. At the same time, the Bank acted in line with the priorities of the ING Group's sustainability strategy. Priority was given to opportunities that have a high impact in the short term and can be integrated into existing business processes. In this direction, opportunities such as the development of new sustainable financing products, energy efficiency and renewable energy financing; It has been among the priority areas due to its high compatibility with ING Türkiye's business model and its direct contribution to climate targets.

With this approach, ING Türkiye takes into account environmental and social impacts and adopts a risk management approach that manages climate risks at a strategic level.

3.3. Monitoring, Reporting and Review

The Environmental, Social, Governance Risk (ESG) assessment process in the wholesale and business banking segments is carried out in the form of a basic or comprehensive assessment depending on the transaction amount and product type. In the wholesale segment, topics such as prohibited activities, country risk, transit risks and physical risks, supply chain risks and reputational risk are analysed in detail; In the business segment, in addition to prohibited activities, country risk, transit risks and physical risks, ESR Self-Assessment processes are carried out and a declaration of competence is obtained when necessary.

In the analysis of sustainability risks, central data sources provided by the ING Group are used; country risk classifications, sector-based guidelines and environmental-social sensitivity indicators constitute the main inputs of this process. Prioritization is based on a qualitative analysis of criteria such as transaction type, sector, field of activity, and regional context, rather than classifications based on fixed thresholds. In

high-risk situations, in-depth review and high-level approval mechanisms are put in place. This enables context-based analysis of risks, enabling activity-specific assessments rather than uniform classifications.

In addition, both internal and external effects are analysed through the wholesale banking ESG factor assessment process; In addition to environmental issues such as carbon emissions, climate adaptation, biodiversity, water use, circular economy, holistic assessments are also made in social (workforce, customer relations) and governance (corporate structure, policies and commitments) areas.

ING Türkiye's ESG risk management is carried out with a structure designed within the framework of the life cycle. This structure consists of six key phases:

- Risk Identification: In line with the ING Group Risk Inventory, risk classes are determined in accordance with local regulations and internal policies; Environmental and social risk factors that may apply to each segment of the value chain are identified. Inputs are sourced from a variety of sources, including ING Group data sources and customer statements.
- Risk Assessment: Risk classification methodologies and segment-based procedures are implemented; customer or transaction-based ESG assessments are carried out for wholesale customers according to the type of transaction. ESG factors, including transition risks and physical risks, are also analysed at this stage. All business customers are subject to ESG Risk Review (Basic ESR Review), and according to the sector and credit limit in which they operate, ESR Self-Assessment and customer and mortgage-based physical and transition risk assessment processes are also applied; For customers in out-of-scope segments, project-based evaluation is carried out within certain threshold scenarios. Retail customers have product-based evaluations.
- Risk Mitigation: Prevention plans are prepared for high-risk transactions, collateral assessments are made when necessary, and additional conditions are defined to reduce risk. Transactions that do not comply can be removed from the loan process.
- Risk Monitoring: Significant ESG risks identified are monitored throughout customer relationships and transactions; The evaluation results are updated periodically. In addition, regular monitoring and senior management reporting are carried out within the scope of Climate Risk Appetite Limits. In 2025, no excess was observed in the Climate Risk Appetite indicators.
- Reporting: All material findings on ESG risks are regularly reported to risk committees specialized in various fields such as the Credit Risk and Provisions Committee, the ICAAP Committee, the Risk Committee and the Board of Directors; in addition, the basis for disclosures within the scope of TSRS-compliant sustainability reporting is established.
- Training and Awareness: Awareness activities are carried out for all relevant employees, and regular information and capacity building trainings are provided on the processes.

3.4. Climate Resilience, Scenario Analysis and Stress Testing

Within the scope of TSRS, scenario analyses are expected to be used to assess the impact of climate-related risks on corporate strategy in order to assess the resilience of the business's strategy and business model to climate-related changes, developments and uncertainties, and these analyses are expected to be carried out on the basis of reasonable effort and supportable information without creating excessive costs or efforts.

ING Türkiye: It conducts stress tests and scenario analyses considering different time periods in order to increase the resilience of its business model and strategic planning against climate change-related developments, uncertainties, transition risks and physical risks, and to evaluate the financial impacts arising from climate change. The analyzes in question; In addition to bank strategies and planning, credit portfolio management is closely related to all issues such as cash flow planning, operational infrastructure and strategic capital planning. Thus, it is aimed to test the limits of financial position, asset quality and risk appetite under different scenarios in strategic decision-making processes.

With scenario analyses with different intensities and maturities, an evaluation is made about the resilience of ING Türkiye's business model and strategic planning in the face of climate change-related developments, uncertainties and risks. In addition to internal scenario evaluations, the analyses are based on Delayed Transition and Net Zero scenarios developed by Oxford Economics, which are compatible with the Paris Agreement and include different stress levels, in order to ensure compliance with international standards. In these scenarios, there are assumptions regarding carbon pricing, taxation, energy diversity, demand and prices, technological developments, and macroeconomic factors at the international level.

Among these scenarios, "Delayed Transition" aims to reduce greenhouse gas emissions to zero within a certain period of time and evaluates the transition risks, costs and opportunities that may be encountered in this process. Scenario studies were carried out based on the financial results of 31.12.2025.

Credit Risk: The study, which is based on the ING Group methodology, is mainly carried out by evaluating the effects of changes in credit risk parameters (default rate, default amount, loss in case of default) that may occur due to climate stress scenarios on provisions. Within the scope of the climate risk stress test, short and long-term effects were evaluated based on both scenarios prepared by Oxford Economics. In the evaluation of short-term (3-year) and long-term (10-year) effects, estimates taking into account growth and inflation variables specific to the ING Group and Türkiye were used within the scope of Oxford Economics scenario studies. In both scenarios in the short term, the effects on loan provisions and capital remain limited (low) in terms of the materiality threshold, while in the long term (10-year period), it is simulated that loan provisions will be in an upward trend depending on the scenario severity. The Bank has set climate risk appetite levels in order to effectively manage climate risks arising from its loan portfolio in the short and long term.

Within the scope of the credit risk stress study on climate risks, the physical risk effect was also evaluated with the particular stress methodology. In the relevant study, the housing loan portfolio was evaluated in terms of earthquake, forest fire and landslide risks. The results of the stress test have been evaluated that the physical risk score may increase on THC in high-risk areas (especially in areas with high earthquake

risk), while the effects will be limited in medium and low risk groups. The impact of this effect on total provisions remains below 1%. In the relevant study, although it is not statistically possible, the simultaneous occurrence of earthquakes, forest fires and landslides were simulated for the housing portfolio in all regions, and the aim of the study is to evaluate vulnerabilities and concentrations holistically.

Liquidity Risk: Within the framework of the Liquidity Stress Test, a climate risk stress scenario has been developed to reflect the potential impacts of both physical and transition risks arising from climate change. The scenario in question is structured as a combined scenario that simultaneously involves physical and transit risks, reflecting a more conservative approach. In the scenarios, risk parameters representing the main liquidity stress factors, including the demand for additional loans, the use of non-cash loan limits, delays in loan repayments, possible deposit outflows, and the risk of non-renewal of short-term bank and financial institution borrowings, were taken into account. The impact of the scenario results on the Bank's Liquidity Coverage Ratio (LCR) is expected to be limited to a maximum of 8 bps.

Operational Risk: The operational risk impact of climate change on the Bank's physical assets was simulated according to 3 different frequency levels: 1/10, 1/25 and 1/100 years. Within the scope of the study, scenario-based impacts were evaluated due to operational factors such as damage or unavailability of bank locations (branches, data centers, etc.), process interruptions, customer complaints, and legal penalties. In the analysis made according to the 2025 year-end exchange rate data, estimated losses under these scenarios were projected as 65 million TL (1.3 million EUR), 130 million TL (2.6 million EUR) and 241 million TL (4,8 million EUR), respectively.

In climate risk scenarios, transition and/or physical risks were evaluated. As a result, the Bank's financial effects were assessed to be limited in the short term. In the long term, it is predicted that as the severity of the impact of climate change on life and the economy increases, the risks may gradually increase. These scenario analyses are integrated into the Bank's decision-making processes and contribute to risk appetite and risk policies, stress testing methodologies, capital planning and reporting processes. In addition, scenario results are reported and presented to senior management within the scope of the Internal Capital Adequacy Assessment Process (ICAAP) and updated regularly.

The level of detail in the Bank's customer-based portfolio data, international and national climate policies and legislative developments, publicly available national climate data, and uncertainties in the severity and type of climate events are evaluated within the scope of the constraints in the scenario studies. For each scenario, areas where the Bank may be affected have been identified, and efforts are underway to develop scenario diversity and analysis methodologies in line with international standards.

Thanks to this holistic structure, ING Türkiye not only identifies risks and opportunities arising from sustainability; but also integrates these elements into strategic planning, loan allocation processes, product development decisions, capital adequacy analyses and ICAAP reporting. Scenarios of different severities are evaluated together with breakdowns and temporal effects on the basis of the field of activity, and portfolio flexibility and financial resilience are tested, thus shaping decision-making mechanisms from an ESG and climate risks perspective and supporting a corporate governance structure compatible with

sustainability goals. Detailed information on the governance of risks and opportunities [is given in Chapter1](#).

4. Metrics and Targets

4.1. Metrics

Pursuant to paragraph 46 of TSRS 1, measures for monitoring sustainability-related risks and opportunities that are reasonably expected to affect the future financial adequacy of businesses are expected to be disclosed. Climate-related transition risks, physical risks and assets for opportunities were assessed (qualitatively) with descriptive and descriptive information within ING's business model and value chain. In the current period, only quantitative information on the assets and activities included in the report is presented, and no additional data has been produced outside this scope. In addition, framework preparations for the collection and standardization of sustainability and climate-related metrics have been initiated. This study aims to improve data quality, create a centralized ESG data structure, and eliminate manual data collection processes. This will ensure consistency, transparency, and accuracy in reporting processes, creating a more robust infrastructure for future analysis and decision-making mechanisms. Reference was made to the disclosure issues in the Standards (SASB Standards) published by the Sustainability Accounting Standards Board in accordance with TSRS 1 55 and the applicability of these issues was evaluated for both ING Türkiye and its subsidiaries.

Regarding emission metrics, Scope 2 greenhouse gas emissions in the 2024 reporting period-were disclosed according to the market-based methodology. In the current reporting period, in line with the requirements of the Turkish Sustainability Reporting Standards, Scope 2 emissions for 2024 were calculated retrospectively based on the location-based methodology and presented comparatively with the data for the 2025 reporting period.

Starting from the 2025 reporting period, Scope 2 greenhouse gas emissions-are calculated and reported based on both market-based and location-based methodologies.

The calculation methodology for diesel fuel consumption, which is included in the scope of Scope 1 greenhouse gas emissions, has been revised for 2024. In the previous application, diesel fuel consumption was calculated based on purchasing data, and this approach caused mismatched fluctuations in emission values between periods.

Therefore, in order to provide a more consistent and representative calculation, diesel fuel consumption has been recalculated based on the average estimated monthly consumption data. The methodology update was applied retrospectively for the 2024 reporting period and as the current method for the 2025 reporting period, and the comparative emission data was revised according to this approach.

In addition, the emission data for 2024 has been revised retrospectively as a result of ING European Financial Services' evaluation within the scope of organizational limits. In 2025, the subsidiary was included in the emission calculations.

Emission Data

ING Türkiye greenhouse gas emission calculations were carried out within the framework of the Greenhouse Gas Protocol: Corporate Accounting and Reporting Standard (2004) and ISO 14064-1:2018 standard. In determining the organizational limits of emissions, the operational control approach defined in the Greenhouse Gas Protocol and Article 5.1(a) of the ISO 14064-1 standard was adopted. Pursuant to Provisional Article 3 of TSRS 2, since businesses are not obliged to disclose their Scope 3 greenhouse gas emissions in the first two reporting periods, the transition exemption was used, and Scope 3 emission data was not included in the current reporting period. However, after the completion of the relevant data collection processes, it is planned to strengthen the infrastructure for including financed Scope 3 emissions in the calculations in future periods.

In line with its long-term commitments to reduce its environmental impacts in all countries where it operates, ING Group has been reporting within the scope of the Global Environment Program since 2009. These reports, which were initially prepared on an annual basis, started to be submitted semi-annually as of 2019, and the reporting frequency has been reduced to quarterly periods as of 2022. This approach enables regular and close monitoring of the carbon footprint, allowing for tangible progress towards achieving emission reduction targets. The unit responsible for the calculation and performance monitoring of indirect and direct emissions at ING Türkiye has been determined as the Corporate Real Estate Management and Facility Services Department. Scope 1 emissions; generator, natural gas consumption data. ING Türkiye supplies a large part of its electricity needs through renewable energy purchase agreements. In addition, through the rooftop SPP located in the Kahramanmaraş location, a certain proportion of the electricity consumption in this location is met through on-site generation.

In 2025, ING Türkiye procured approximately 95% of its total electricity needs from renewable sources. Indirect emissions arising from electricity consumption from non-renewable sources have been offset by renewable energy certificates (EAC) since 2021. Scope 2 greenhouse gas emissions were calculated based on the location-based methodology and reported numerically. In location-based calculations, Turkish electricity grid emission factors for the relevant reporting periods were used. In addition, in order to support the understanding of the electricity supply structure, Scope 2 emission information calculated according to the market-based approach, taking into account renewable energy certificates (EAC/IREC),-is also included in an explanatory manner.

Comparing 2024 and 2025, the Bank's total greenhouse gas emissions decreased by approximately 18% compared to the location-based approach and by 26% compared to the market-based approach. This decline: It is directly related to the operational improvements implemented to reduce Scope 1 and Scope 2 emissions. The replacement of natural gas heating systems with completely electric-based systems in buildings in the Aegean Region and the installation of automation and monitoring systems that keep the indoor temperature constant at 24°C contributed to emission reduction. In addition, the completion of pump replacements in order to increase energy efficiency in the Maslak building and the start of daily measurement and anomaly monitoring for natural gas consumption supported the more effective

management of energy consumption. These actions are considered as concrete outputs of the Bank's strategic approach to energy efficiency and emission reduction.

ING Türkiye monitors the activity data included in the emission calculation through various departments (Facility Management, Purchasing, Human Resources, Finance) and obtains the calculation factors used from internationally accepted reliable sources. These data are processed centrally by the ING Group through the Environmental Management System. In this way, the margins of error that may occur while making various assumptions are minimized. The assumptions used within the scope of predictive calculations are applied especially for activities with a lack of data, and the impact of these estimates on total greenhouse gas emissions is considered to be limited. Such calculations usually represent a small fraction of total emissions.

In the calculations for Scope 1 and 2 emissions, inputs such as natural gas, diesel, heating oil and electricity consumption are taken into account; in case of missing data, FTE (Full-Time [Equivalent](#); Assumptions based on internationally accepted methodologies such as average consumption per Full-Time Equivalent), run-rate estimates and consumption rates per square meter are applied. The emission factors used are sourced from trusted institutions such as DEFRA and the International Energy Agency (IEA). In the metrics and targets determined by the Bank; Greenhouse gas emission data are presented at "gross" values and are monitored and reported annually. The emission values of ING Türkiye, including its subsidiaries, are presented below.

| Scope | Unit | 2024 | 2025 | Change (%) |
|---|--------------------|------------|------------|------------|
| Scope 1¹¹ | tCO _{2eq} | 594 | 439 | %26 |
| Scope 2¹²- Location based | tCO _{2eq} | 4531 | 3770 | %17 |
| Scope 2- Market based | tCO _{2eq} | 0 | 0 | %0 |
| Scope 1 + Scope 2- Location based | tCO _{2eq} | 5125 | 4209 | %18 |
| Scope 1 + Scope 2- Market based | tCO _{2eq} | 594 | 439 | %26 |

Table 2 ING Bank A.Ş. and Subsidiaries – Scope 1 and Scope 2 Emissions

The Bank operates in the same Head Office building as its subsidiaries, and the total area utilization rate is 0.52% for ING Securities and 0.57% for ING Leasing. Taking these ratios into account, Scope 1 and Scope 2 greenhouse gas emissions corresponding to these subsidiaries were included in the consolidated emission figures.

ING European Financial Services (IEF) is a 100% subsidiary of ING Bank A.Ş. and ING Bank A.Ş. operates as a subsidiary of ING Bank N.V. IEF's operational activities are carried out in ING Bank N.V.'s Dublin office, in shared office spaces operated by the upper group; There is no separate physical area or directly measurable energy consumption data for the IEF.

¹¹ There is no distinction between location-based and market-based in Scope 1 emissions.

¹² All electricity used within the scope of the Bank's activities is provided by renewable sources or covered by the EAC (Energy Attribute Certificate). Therefore, market-based scope 2 emissions are 0.

Within the scope of the ING Group emission reporting protocol, locations with less than 500 employees are not accepted as materials, and emission calculations for both ING Bank N.V.'s Irish operations and the IEF operating within this scope are made using the average emission values per FTE. Accordingly, greenhouse gas emissions of the IEF were calculated by multiplying the emission multiplier per FTE determined by the ING Group for Ireland by the number of FTEs as of the IEF's reporting period and included in the report. Since 2015, ING Türkiye has been obtaining IREC renewable energy certificates, which are verified by independent third-party organizations. It is planned to continue this approach within the framework of the current practice. IREC certificates are considered as a complementary tool in achieving the targets for reducing emissions from operations.

ING Group has adopted the net zero target within the scope of combating climate change. This goal includes not only carbon reduction but also the evaluation of carbon offset mechanisms over time. Accordingly, ING Türkiye implements its greenhouse gas reduction roadmap, which includes the following elements, in line with the group's targets. Additionally, the base year has been updated from 2013 to 2023 to enhance compliance with global standards and data accuracy. This change is in line with the best practices recommended by the Science Based Targets Initiative (SBTi) and provides a more up-to-date and realistic reference point, strengthening the traceability and reliability of the targets.

- **Target type and nature:** Targets are absolute values **based on the base year 2023**. It is committed to a 23% reduction in scope 1, 2 and 3 (business travel) emissions by 2030, a 44% reduction **separately for scope 1 and 2**, and an increase in the use of renewable electricity to **100% by 2030**. To support these targets, it is committed to reduce energy consumption by **65%** compared to the base year 2014. It also aims for 90% of leased vehicles **to be electric by 2030**.
- **Target scope:** These targets cover all units within the scope of operational control.
- **Temporary milestones:** 10% reduction in Scope 1, 2 and 3 emissions compared to the base year 2023 (tCO₂e)
- **Target application:** Targets are calculated based on **the base year 2023**. Renewable **energy certificates (EAC)** and **SBTi-approved methodologies** are used within the scope of the net zero target.
- **Compliance with international agreements:** These targets have been established in line with the criteria of the Paris Agreement and the Science Based Targets Initiative (SBTi).
- **Verification:** The methodology used in setting targets is verified by SBTi.
- **Monitoring and performance:** The data collected through the data management system of the ING Group and consolidated with the MEF (Master Evidence File) tool are evaluated annually and approved by the relevant committees. Trends in emissions are monitored in internal management panels, and targets are updated when necessary.

The emissions reported by ING Türkiye are monitored in line with these targets and shared annually in public reports.

Sustainable Finance Metrics

Efforts to increase financing for sustainable investments across the ING Group also include ING Türkiye. In this context, Wholesale Banking and Business Banking sustainable financing data, including the mobilization amounts carried out by ING Türkiye, are summarized below. Wholesale Banking's sustainable financing volumes include both the transactions in the balance sheet of ING Türkiye and the sustainable financing transactions that we disburse, coordinate and mediate as the ING Group.

| Category/Year | 2024(€m) | 2025(€m) |
|---------------------------------------|----------|----------|
| Wholesale Banking¹³ | 3,824 | 3,350 |
| Business Banking | 159 | 128 |

Table 3 ING Bank A.Ş. Sustainable Finance Volume Mobilized

ING Türkiye's sustainable finance mobilization data is prepared in line with the Sustainable Finance methodology developed by the ING Group, and in this context, the European Union Sustainable Finance Taxonomy (EU Taxonomy), LMA (Credit Market Association) Standards, BRSA Green Asset Ratio (GAR) criteria and ING Bank A.Ş.'s internal classification systems are taken as basis. In order to take advantage of opportunities in the field of sustainable finance, ING Türkiye aims to increase the volume of sustainable financing in its business banking portfolio by 5%-20% by the end of 2027 compared to the base year 2025.

Other Cross-Sector Climate-Related Metrics

Loan portfolio climate risk appetite limits were established to monitor assets vulnerable to climate-related transition risks. In this context, as of December 2025, 43% of the wholesale-commercial portfolio and approximately 9% of housing loans are considered in the category of high-risk assets and included in lending processes in terms of transition risks.

In order to assess assets that are vulnerable to climate-related physical risks, the operational risk impact of climate change on the Bank's physical assets was simulated according to the frequency of 1/10. Within the scope of the study, scenario-based impacts were evaluated due to operational factors such as damage or unavailability of bank locations (branches, data centers, etc.), process interruptions, customer complaints, and legal penalties. In the analyzes made according to the 2025 year-end exchange rate data, the estimated loss under this scenario is projected as 65 million TL. The net profit ratio of the loss simulation in question at the end of 2025 is 3.7%.

Within the scope of climate-related opportunities, sustainability-focused loan products, which are among the Bank's climate-compatible activities, are monitored within the loan portfolio. Accordingly, cash loans on the solo balance sheet extended to sustainable customers are considered assets that align with climate-related opportunities. As of 2025, the share of revenues from cash loans extended to sustainable customers in the Business Banking segment in total business cash loan revenues was 2.8%. In the Wholesale Banking segment, the share of revenues from cash loans extended to sustainable customers in

¹³ Wholesale Banking sustainable financing volumes cover both on-balance-sheet transactions of ING Türkiye and sustainable finance activities provided, coordinated, or intermediated by ING Group.

total wholesale cash loan revenues was 9.5%. These indicators reveal the impact of activities aligned with climate-related opportunities on the Bank's loan portfolio and financial performance.

TSRS 2-Appendix Volume-16 Commercial Banking Metrics

Table 1 – Sustainability Disclosure Topic

Inclusion of Environmental, Social and Governance (ESG) Factors in Credit Analysis
(Code: FNCB-410a.2)

In its creditworthiness assessment processes within the scope of lending activities, ING Türkiye takes into account the environmental, social and governance (ESG) factors related to the sectors and fields of activity in which borrowers operate within the framework of the general risk assessment. This approach aims to support the holistic consideration of credit allocation decisions along with financial indicators and related risks.

The assessment of ESG elements is carried out in line with the credit policies and procedures implemented, taking into account sector-based risk profiles and applicable regulatory frameworks. These assessments contribute to monitoring the overall risk profile of the loan portfolio within the framework of ING Türkiye's risk management approach.

Details regarding this issue are detailed under the heading of Risk Management 3.2 Identification and Assessment of Risks.

Table 2 – Activity Metrics

The following operating metrics are presented in accordance with the operating metrics defined under TSRS 2 – Annex Volume 16 "Commercial Banks". The metrics in the table reflect quantitative indicators of the Bank's commercial banking activities, and the relevant amounts are based on data obtained from the Bank's internal systems.

Periodic changes in operating metrics were mainly driven by macroeconomic developments and the Bank's strategic focus on customer segments. The increase in the value of retail checking and savings accounts and the amount of retail loans was due to the increase in average transaction amounts due to the inflation and interest rate environment, while the number of loans decreased slightly. The increase in the number and value of checking and savings accounts owned by small businesses, as well as the number and amounts of small business loans, correlates with increased customer acquisition and loan disbursement activities in this segment. In the wholesale loan segment, although the number of loans decreased slightly, the total loan volume increased as a result of the increase in average transaction amounts due to foreign currency loans and exchange rate movements.

| Activity Metrics | Value | | Unit | TSRS 2 – Appendix Volume 16 Code |
|--|----------------|-----------------|----------|----------------------------------|
| | 2024 | 2025 | | |
| Number of personal checking and savings accounts | 5,141,104 | 5,251,410 | Quantity | FNCB000. A |
| Number of small business ¹⁴ checking and savings accounts ¹⁵ | 14,584 | 20,286 | Quantity | FNCB000. A |
| Value of personal checking and savings accounts | 89,432,445,655 | 138,971,286,634 | TL | FNCB000. A |
| Value of small business checking and savings accounts ¹⁶ | 1,820,653,623 | 1,981,766,655 | TL | FNCB000. A |
| Number of personal loans | 384,914 | 316,688 | Quantity | FNCB000. B |
| Number of small business loans ¹⁷ | 13,928 | 24,638 | Quantity | FNCB000. B |
| Number of corporate loans ¹⁸ | 5,486 | 4,471 | Quantity | FNCB000. B |
| Amount/value of personal loans | 15,320,818,145 | 22,370,772,391 | TL | FNCB000. B |
| Amount/value of small business loans ¹⁹ | 3,178,067,940 | 6,855,543,100 | TL | FNCB000. B |
| Amount/value of corporate loans ²⁰ | 46,899,361,447 | 57,041,914,823 | TL | FNCB000. B |

Table 4 ING Bank A.Ş. Activity Metrics

4.2. Targets

In line with its vision on sustainability and climate, ING Group sets short, medium and long-term targets to reduce its environmental impacts. ING Türkiye, on the other hand, shapes its sustainability approach in line with ING Group's global net zero targets. These goals aim to both increase resource efficiency in operational processes and take responsibility for the global climate crisis. In determining the targets, in parallel with the ING Group, international policies and regulations such as the European Green Deal (EGD), the Emissions Trading System, the Carbon Border Adjustment Mechanism (CBAM) as well as Türkiye's policies and strategies are taken into consideration. In this context, the targets set, and the progress made are presented below. In line with the targets, ING Türkiye's environmental performance is constantly monitored, improvement opportunities are identified and reported transparently.

ING Group's operational emission reduction targets were recalibrated in 2025. In this context, the targets covering only Scope 1 and Scope 2 emissions compared to the 2014 base year in previous periods have

¹⁴ The scope of small enterprises has been determined within the framework of the BRSA SME criteria.

¹⁵ The number of checking and savings accounts of small businesses for 2024 has been updated as a result of the review and presented in this report in its current form.

¹⁶ The value of checking and savings accounts data for small businesses for 2024 has been revised and presented in its updated form in this report.

¹⁷ The small business loan count data for 2024 has been revised and presented in this report in its updated form.

¹⁸ The data on the number of corporate loans for 2024 has been revised and presented in this report in its updated form.

¹⁹ The amount/value of small business loans data for 2024 has been updated as a result of the review and presented in this report in its current form.

²⁰ The amount/value of corporate loans data for 2024 has been updated as a result of the review and presented in this report in its current form.

been updated as of 2025 based on the 2023 base year. Re-determination of the base year as 2023; Improvements in data quality have been realized taking into account updates in emission factors, methodological improvements and changes in reporting coverage.

As a result of these changes, emission reduction targets have been redefined in order to ensure comparability with previous targets and to increase the consistency and relevance of the reported data. The updated targets are set to reflect the Bank's current operational limits and up-to-date data set and are monitored in line with its sustainability strategy. In this context, the 2025 performance is the starting point for the new targets, and performance evaluations will be presented regularly in the following reporting periods.

ING Group's Targets and ING Türkiye's Strategic Compliance

| Term | Target | Target Description | Target Type | Metric | Monitoring Method | Responsible Unit |
|--------------------------------|---|--|---------------------------|---|--|---|
| Short-Term Goals (2025) | Consolidated absolute emission reduction from bank operations ²¹ | By 2025, ING Group's total emissions from its operations are targeted to decrease by 10% compared to the base year 2023 . CO2 is taken into account within the scope of the operational footprint. | Absolute Goal | Scope 1, 2 and 3 (business travel) emissions (tCO ₂ e) | GHG Protocol and ISO 14064-1:2018 standard | - Financial Control and Treasury EVP- Operation EVP -Human Resources EVP |
| | Renewable energy financing | By the end of 2025, it is aimed to provide annual financing of 7.5 billion Euros to renewable energy projects. | Absolute Goal | Annual volume of financing provided (€ billion) | Group sustainable finance reporting | Wholesale and Business Banking business lines |
| Medium-Term Goals (until 2030) | Emission reduction | By 2030, ING Group; 1. Compared to the base year 2023 , due to its own operations; - 44% reduction in Scope 1 and 2 emissions - Achieve a 23% reduction in Scope 1+2 and business travel emissions 2. Increase the renewable electricity usage rate to 100% 3. 90% of the vehicles ranked to be electric 4. Aims to reduce energy consumption by 65% compared to the base year 2014 | Absolute Goal | 1. Scope 1 and 2 emissions (tCO ₂ e) and consolidated scope 1, 2 and 3 (business travel) emissions (tCO ₂ e) 2. Ratio of renewable electricity consumption to total electricity consumption (kwh) 3. The ratio of the number of electric vehicles to the total number of vehicles in leased vehicles 4. Energy consumption (kwh) | GHG Protocol and ISO 14064-1:2018 standard | - Financial Control and Treasury EVP- Operation EVP -Human Resources EVP |
| Long-Term Goals (after 2030) | Net Zero Emission Intensity Target | ING Group aims to direct the highest carbon-intensive divisions in its loan portfolio to net zero emissions by 2050 | Emission Intensity Target | Achieving net zero sector-based carbon intensity targets in line with the ING Group | ING Terra portfolio tracking | Wholesale and Business Banking business lines |
| | Sustainable economy investments | It is aimed to diversify sustainability-oriented investments and increase financial support. | Absolute Goal | Annual volume of financing provided (€ billion) | Group sustainable finance reporting | Sustainable finance targets; Wholesale and Business Banking business lines |

Table 5 ING Bank N.V.'s Targets and ING Türkiye's Strategic Compliance

²¹ Since no carbon credits or equivalent offset mechanisms are utilized, the reported figure reflects the gross emission reductions from our operational activities.

The emission intensity reduction targets of the sectors determined within the scope of the Terra approach developed by the ING Group are supported by ING Türkiye, and financing decisions are in line with this strategic orientation. In March 2025, ING Group became the first global systemically important bank to receive validation from the Science Based Targets initiative (SBTi) for its 1.5°C-aligned targets. SBTi has validated the ING Group's emission reduction targets for the power generation, oil & gas, cement, steel, automotive, aviation and commercial real estate sectors and confirmed that these targets are in line with the 1.5°C target of the Paris Agreement. The shipping and residential real estate sectors, which are currently among the sectors covered by Terra, are not included in the SBTi-verified sector targets as of March 2025. However, the shipping sector is measured based on ING's Poseidon Principles methodology and the net zero scenario developed under the DNV 1.5°C Initiative and is aligned with the 1.5°C pathway as of 2024 (compliance difference: -4.6%).

The transition plan for the climate is handled within the scope of a framework prepared at the ING Group level and currently in force. The transition plan in question; In line with its net zero targets, it includes the gradual transformation of carbon-intensive parts of the loan portfolio and the direction of financing decisions in line with sector-based mitigation pathways.

ING Türkiye is based on this transition plan determined by the Group and carries out its activities in line with the relevant goals, policy sets and methodologies. In this context, loan allocation processes and sustainable financing priorities, especially in sectors with high emission potential, are managed in parallel with the Group framework.

Details of the transition plan determined by ING Group are included in the ING Group Annual Reports documents.

As of the reporting period, there is no separate and independent transition plan specific to ING Türkiye, and the implementation of the transition plan is contributed to through data provision and operational compliance in line with the approach determined at the Group level.

As one of the countries contributing to the goals of the ING Group, ING Türkiye continues to monitor and direct the development of its portfolio within this framework. In this context, the sector-based transformation of the loan portfolio and its alignment with the targets are monitored and implemented through the Terra approach. Within the scope of Terra targets, the net zero target for each sector is based on roadmaps for reducing greenhouse gas emission intensity, and the base year varies by sector. The progress of the targets is monitored by the ING Group Annual Reports published annually and reviewed when necessary.

| Emission Targets for Terra Sectors ²² | | | | |
|--|-----------|------------|---|---------------|
| Sector | Base Year | Timeline | 2030 Scenario | Latest Update |
| Power Generation | 2018 | 2030, 2040 | IEA NZE (WEO, 2023) ²³ | 2025 |
| Oil & Gas: Upstream | 2019 | 2030, 2040 | IEA NZE (WEO, 2023) | 2025 |
| Oil & Gas: Downstream | 2022 | 2030, 2050 | IEA NZE (Emissions from Oil and Gas Operations in Net Zero Transitions, 2023) ²⁴ | 2025 |
| Cement | 2020 | 2030, 2050 | IEA NZE (WEO, 2023) | 2025 |
| Steel | - | 2030, 2050 | IEA NZE (WEO, 2021) and MPP's Technology Moratorium ²⁵ | 2025 |
| Automotive | 2020 | 2030, 2050 | IEA NZE (Net Zero by 2050, 2021) ²⁶ | 2025 |
| Aviation | 2023 | 2030, 2050 | MPP PRU ²⁷ | 2024 |
| Shipping | - | 2030, 2050 | DNV 1.5°C Initiative ²⁸ | 2024 |
| Commercial Real Estate | 2022 | 2030, 2050 | CRREM 1.5° C GHG pathways (based on IEA NZE) ²⁹ | 2025 |
| Residential Real Estate | 2021 | 2030, 2050 | The scenario has not been determined yet ³⁰ | 2025 |

Table 6 ING Bank N.V. Emission Targets for Terra Sectors

This table shows that ING Group defines the sector-based targets of the Terra approach through emission intensity metrics, aligned with science-based scenarios. There are methodology differences between sectors, and in some sectors, targets are monitored through alignment or methodology development phase rather than absolute reduction. ING Group manages its targets and progress regarding high-carbon intensity sectors within the scope of the Terra approach, in line with science-based scenarios and centrally throughout the group. Target setting, progress tracking and reporting processes for the sectors covered by Terra are carried out within the framework of a consolidated methodology and the results are evaluated at the group level. ING Türkiye's contribution in this period; Maintaining alignment with the Group's methodologies is achieved through the implementation of sectoral credit policies determined by the Group in local processes and the integration of climate risks into credit allocation and monitoring processes. In this context, the activities in the Terra sectors are managed in line with the transformation

²² The data is taken from the "ING Group Annual Report 2025" report.

²³ International Energy Agency (IEA) Net Zero Emissions Scenario (World Energy Outlook 2023)

²⁴ International Energy Agency (IEA) Net Zero Emissions Scenario (Net Zero Transformation of Oil and Gas Operations 2023)

²⁵ International Energy Agency Net Zero Emissions Scenario (World Energy Outlook 2021) and Mission Possible Partnership (MPP) Technology Freeze Approach

²⁶ International Energy Agency 2050 Net Zero Emissions Scenario (2021)

²⁷ Mission Possible Partnership (MPP) – PRU Approach

²⁸ DNV 1.5°C Interference

²⁹ Carbon Risk Real Estate Monitoring Project (CRREM) 1.5°C Greenhouse Gas Emission Pathways (based on IEA Net Zero Emissions Scenario)

³⁰ Due to the wide range of factors ranging from policies to homeowners and stakeholder groups playing a major role in achieving the net zero target in the housing sector, a net zero vision has been determined for the ING Residential Real Estate (RRE) portfolio instead of a net zero-compatible target.

targets pursued throughout the group. The methodology, targets, and progress made as of 2025 regarding the Terra approach are detailed in the relevant sustainability reporting of the ING Group.

The ultimate goal of ING Group's sustainability goals is to align its loan and investment portfolio with a net-zero emissions economy by 2050 and to support the 1.5°C target of the Paris Agreement. These targets also aim to reduce the most carbon-intensive parts of the financing portfolio, increase the resources directed to sustainable projects, and create a banking model that is resilient to climate risks. As of the reporting period, ING Türkiye does not have a defined internal carbon price application used in investment decisions, risk assessments or scenario analysis. As of 2025, there are no studies on the future internal carbon price application.

These target and target setting methodologies have not been specifically verified by an independent third party in the case of ING Türkiye at this time. However, in areas such as emission reduction and sustainable finance, data is collected in accordance with the methodologies determined by the ING Group and integrated into the group reporting. Therefore, although the targets stated in this report belong to the ING Group, ING Türkiye's compliance with these goals, its contributions and integration processes are explained.