TSRS Compliant Sustainability Report

2025

ENBD

DenizBank

Contents

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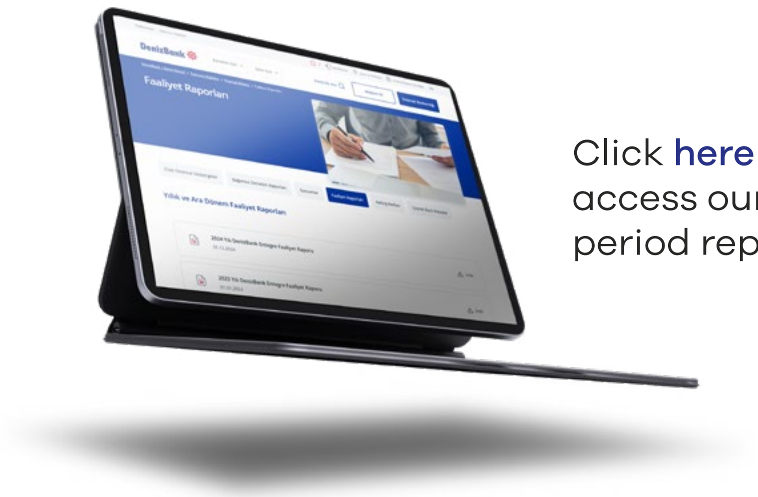
The 2025 TSRS-Compliant Sustainability Report presents information useful to the primary users of general-purpose financial statements, covering the financial reporting process for the financial year 1 January – 31 December 2025, in accordance with the principles of materiality, fair presentation, comparability and understandability. The consolidated disclosures on sustainability and climate-related matters included in this report have been prepared for DenizBank A.Ş. (hereinafter referred to as "DenizBank" or "the Parent Company Bank") and its subsidiaries (collectively referred to as "the Group") and are disclosed in accordance with the Türkiye Sustainability Reporting Standards (TSRS) published by the Public Oversight, Accounting and Auditing Standards Authority (POA).

The information contained in this report comprises consolidated sustainability and climate-related information covering the entire value chain of the Group and DenizBank.



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Reporting Standards and Compliance

Türkiye Sustainability Reporting Standards (TSRS), developed on the basis of IFRS S1 and IFRS S2 published by the International Sustainability Standards Board (ISSB), have introduced mandatory disclosure requirements in Türkiye regarding sustainability and climate-related matters with effect from 1 January 2024.

DenizBank's 2025 TSRS-Compliant Sustainability Report has been prepared in accordance with the compliance requirements set out in the standards TSRS 1 – General Requirements for Disclosure of Sustainability-related Financial Information and TSRS 2 – Climate-Related Disclosures standards. The report provides information under four main headings "Governance", "Strategy", "Risk Management" and "Metrics and Targets" in accordance with the standard set by the POA.

Taking into account DenizBank's business structure, which offers credit, financing and banking products, the following documents published under TSRS 2: "Guidance on the Sector-Specific Application of Climate-Related Disclosures – Appendix Volume 15: Asset Management and Custody Activities", "Guidance on the Sector-Specific Application of Climate-Related Disclosures – Appendix Volume 16: Commercial Banks" and "Guidance on the Sector-Specific Application of Climate-Related Disclosures – Appendix Volume 18: Investment Banking and Brokerage".

Whilst the Parent Company Bank has based the preparation of the report on TSRS 1 and TSRS 2 standards, it has also drawn guidance from the "Commercial Banking" sector specific guidance of the Sustainability Accounting Standards Board (SASB) Sector Specific Guidance and the Greenhouse Gas Protocol: Corporate Accounting and Reporting Standard (2004) for its emissions data. Furthermore, as the Metrics and Targets section of the report contains referenced metrics, the Global Reporting Initiative (GRI) has been taken into account.

Transition Exemptions

DenizBank is benefiting from a transitional exemption under TSRS E4.

- **TSRS 1 E4:** DenizBank is benefiting from a transitional exemption under TSRS E4.

In accordance with Provisional Article 3 of the Board Decision on the Scope of Application of TSRS, the Parent Company Bank has not disclosed Scope 3 greenhouse gas (GHG) emissions in the report, as disclosure of such emissions is not mandatory during the first two-year reporting periods.

Information Related to Financial Disclosures

The sustainability and climate-related financial disclosures have been prepared and presented in full alignment with the Banking Regulation and Supervision Agency (BRSA) consolidated financial statements and the financial reporting period covering 1 January to 31 December 2025.

The aim is to assess the impact of sustainability and climate-related risks and opportunities on financial performance in a manner that is simultaneous with and consistent with the financial statements for the relevant period. Unless otherwise stated, the financial data included in the report is presented in Turkish lira (TL).

Reporting Entity Boundaries and Measurement Approach

DenizBank has prepared its sustainability and climate-related financial disclosures based on the Group's consolidated financial statements and business model, ensuring consistency with Group-wide information. Accordingly, a Group-level reporting approach has been adopted under TSRS 1 and TSRS 2.

The aim of this approach is to enable users of general-purpose financial reports to assess, from a holistic perspective, the potential short-, medium- and long-term impacts of sustainability related risks and opportunities on the Group's cash flows, access to finance and cost of capital.

DenizBank presents its sustainability and climate-related financial disclosures in a structure that is identifiable, traceable and verifiable. As the parent company within the Group and being subject to TSRS reporting obligations, this report, prepared by DenizBank, serves as the primary reference document for sustainability and climate-related financial disclosures across the Group.

Deniz Yatırım Menkul Kıymetler A.Ş. (Deniz Yatırım), a member of the the Group with separate reporting obligations under the TSRS, discloses information to the public via a separate TSRS-compliant sustainability report prepared in accordance with the nature of its activities and organisational boundaries.

The scope of consolidation forming the basis of DenizBank's sustainability reporting has been determined by taking into account the Parent Company Bank's financial and operational control over its subsidiaries. Within this framework, GHG emissions have been consolidated using the financial control approach. Emissions relating to companies owned by DenizBank's subsidiaries have also been consolidated within the Group via the relevant subsidiaries.

Judgements and Measurement Uncertainty

The data presented in the report, such as the assumptions and operational boundaries used by DenizBank in its emissions calculations, has been obtained from internal sources and third-party data providers. As it is based on measurements and estimates, some information may indicate approximate values and may not be absolutely precise. The Parent Company Bank has endeavoured to ensure the accuracy and reliability of all information contained in the report. The selection of guidance sources was carried out using professional judgement.

The main areas of judgement and measurement uncertainties outlined in the relevant sections of the report are summarised below:

- **Scenario Selection and Framework:** The choice to use the RCP and SSP scenarios developed by the Intergovernmental Panel on Climate Change (IPCC) for the assessment of physical risks, and the International Energy Agency's (IEA) Current Policies, Stated Policies and Net Zero Emissions scenarios for the assessment of transition risks, involves a judgement call. The selection of different scenario frameworks constitutes an element of uncertainty that may influence the results of the analysis.
- **Determination of Time Horizons:** The definition of short-, medium- and long-term time horizons is based on the Parent Company Bank's strategic planning cycle, the average maturity of the loan portfolio and the time horizon for the materialisation of climate risks; these definitions are based on judgement.
- **Water Stress Analysis:** Assessments conducted for the years 2030 and 2050 under different scenarios using the World Resources Institute (WRI) Aqueduct dataset involve measurement uncertainty dependent on geographical granularity and scenario assumptions.
- **Interplay between Physical and Transition Risks:** In holistic assessments based on the combined consideration of high-warming scenarios and standard transition scenarios, modelling the interaction between these two types of risk requires judgement.
- **Areas of Assumptions and Uncertainties Regarding Scenario Analyses and Financial Impact Calculations:** In scenario analyses and the resulting financial impact calculations, the development of carbon pricing mechanisms, the timing and severity of changes in the regulatory framework, the gradual reduction in free allowances, the pace of the energy transition, the capacity to transition to low-carbon technologies, the geographical distribution of climate-induced physical impacts, and developments in the cyber threat landscape are considered as key assumptions. In this context, water stress analyses are based on 2025 turnover figures and geographical distribution; CBAM analyses are based on carbon price scenarios and allocation assumptions; whilst cyber risk analyses are based on data breach and disruption scenarios. As these analyses are based on forward-looking assumptions, they involve a high degree of uncertainty.
- **Uncertainties Regarding Opportunities:** The pace of growth in market demand for sustainable finance products, the maturation of the regulatory framework for green and sustainability-related products, the final scope of taxonomy and reporting standards, the continuity and predictability of incentive mechanisms, and the rate at which customers are shifting towards sustainable products and services are key areas of uncertainty in the assessment of opportunities.

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- **Cyber Security Risk Analyses:** These are based on the probabilities of data breaches and operational disruption scenarios derived from past occurrences; however, measurement uncertainty exists due to the volatility of the cyber threat landscape.

- **Greenhouse Gas Emissions Calculations:** The emission factors, activity data and conversion factors used in calculating Scope 1 and Scope 2 (location-based and market-based) emissions contain elements based on estimates and therefore carry measurement uncertainty.

- **Determination of Operational and Organisational Boundaries:** The scope of inclusion of subsidiaries and associates within the Group, as well as the choices regarding the consolidation approach, in emission calculations are based on judgement.

- **Baseline Year and Progress Measurement for Targets:** In monitoring progress towards sustainability and climate targets, the selection of the baseline year, methodological changes and updates to the reporting scope may affect measurement results; such changes are disclosed to the public.

- **Application of Sector-Specific Metrics:** Judgement has been exercised in interpreting the guidelines on the sector-specific application of TSRS 2 (Appendix Volume 15 – Asset Management and Custody, Appendix Volume 16 – Commercial Banks, Appendix Volume 18 – Investment Banking and Brokerage) and in harmonising metrics referenced by SASB and GRI.

- **Use of Third-Party Data:** The accuracy of information obtained from third-party data providers, including emission factors, scenario data and customer data, depends on the provider's methodology and frequency of updates.

Materiality Assessment

The sustainability and climate-related disclosures included in this report have been determined in accordance with the principle of financial materiality as defined under TSRS, with the aim of identifying significant information that could reasonably be expected to affect Group's future financial viability. The information deemed material is based on sustainability and climate-related risks and opportunities that could reasonably influence the decision-making processes of the Parent Company Bank's current and potential investors, as well as users of general-purpose financial statements.

Sustainability and climate-related risks and opportunities are assessed by taking into account their potential impact on DenizBank's long-term financial viability. They are reported in accordance with financial materiality thresholds determined in line with the financial audit process. In this context, sustainability and climate-related risks and opportunities expected to have a reasonable impact on the Parent Company Bank's short-, medium- and long-term cash flows, capital structure and access to finance are addressed in the Strategy and Risk Management sections of the report at and respectively.

Sustainability and climate-related risks and opportunities that fall below the defined financial materiality thresholds and are not reasonably expected to affect the Parent Company Bank's future financial viability have been assessed and brought to the attention of Senior Management to support decision-making processes. In line with this approach, risks and opportunities expected to have a significant financial impact have been disclosed to the public within the scope of this report.

As part of the financial materiality assessment, current and potential risks and opportunities related to sustainability and climate change were analysed, covering banking, financial leasing, factoring, portfolio management, investment banking, real estate investment trusts, information technology, electronic payment services and non-financial subsidiaries, in a manner that represents the core business lines within the Group. During the assessment process, the analysis was not limited to the Parent Company Bank's own operations; instead, it took a holistic approach to both upstream elements (suppliers and service providers) and downstream elements (customers and counterparties within the credit and investment portfolios) across the value chain. All risks and opportunities within the value chain were assessed individually through information gathered from relevant departments, sector-specific research, scenario analyses and comprehensive workshops involving stakeholders.

In the financial materiality assessment process, the key criterion was whether the risks in question were measurable, monitorable and manageable within DenizBank's existing corporate risk management framework. As part of this analysis, the potential impacts of sustainability and climate-related risks on the the Parent Company Bank's financial structure were analysed in accordance with the provisions of the TSRS. In assessing the nature, likelihood and magnitude of the impacts of the climate-related risks and opportunities in question, reference was made not only to qualitative factors but also to quantitative thresholds. As part of the quantitative assessment, the potential impacts of the risks and opportunities on the Parent Company Bank's financial statements were measured against the defined financial thresholds. In the qualitative assessment, on the other hand, consideration was given to factors deemed likely to influence decision-making processes to a reasonable extent amongst the primary users of the general-purpose financial statements. The alignment of risks and opportunities with strategic priorities, the degree to which they are subject to the regulatory framework, stakeholder expectations, potential impacts on reputation, the capacity to create long-term value, and the controllability of such risks using existing risk management tools were taken as key criteria. Accordingly, the report also includes sustainability and climate-related information which, whilst falling below the quantitative threshold, is assessed as capable of reasonably influencing decision-making processes in terms of qualitative factors.

As a result of the assessment, a 5% level has been set for Profit Before Tax (PBT), and a deviation of the PBT ratio exceeding 5% is accepted as a threshold value. In the previous reporting period, financial threshold values were defined based on capital adequacy indicators, namely the CET1 (Common Equity Tier 1 Ratio) and the Capital Adequacy Ratio (CAR), and adverse changes exceeding 0.5% in these ratios were considered a material impact threshold. The methodological change was implemented to ensure that the Group's financial performance indicators are directly linked to the impacts of sustainability and climate-related risks and opportunities, and to enhance the alignment of the metrics used in reporting with the Parent Company Bank's annual reports. Accordingly, the approach used to determine financial threshold values has been simplified and aligned with a set of financial performance-focused indicators. In determining the financial materiality threshold, sector-specific practices and international reporting frameworks were also assessed; this threshold is subject to revision in light of future developments, changes to the regulatory framework and the Parent Company Bank's strategic priorities.

Where the relevant threshold and risk appetite indicators are met, it is accepted that the associated sustainability and climate risks can be effectively managed using existing risk management tools and therefore remain below the financial materiality threshold.

The financial and non-financial information presented in the report has been prepared in accordance with the principles of comparability, verifiability, timeliness and understandability, and is presented in a manner consistent with the qualitative characteristics set out in the TSRS.

Data Reliability and Independent Assurance

As part of the mandatory sustainability assurance audit required under the Türkiye Sustainability Reporting Standards published by the POA in the Official Gazette dated 29 December 2023 and numbered 32414(M), Güney Bağımsız Denetim ve Serbest Muhasebeci Mali Müşavirlik A.Ş. (EY) has conducted an assurance engagement in accordance with GDS 3000 "Assurance Engagements Other Than Audits or Reviews of Historical Financial Information" and GDS 3410 "Assurance Engagements on Greenhouse Gas Statements", and the limited assurance report is included in the Appendices section of the report.

About DenizBank

The Reporting Entity

DenizBank commenced operations in 1997 following its acquisition by Zorlu Holding. The Parent Company Bank entered the agricultural banking sector in 2002 with the acquisition of Tarişbank, and was restructured in 2003 under the umbrella of the Group. In October 2006, it was acquired by Dexia, one of Europe's leading financial Groups, and in September 2012, it became part of Sberbank, Russia's largest state-owned bank; subsequently, the Parent Company Bank's shares have been held by Emirates NBD (ENBD), one of the leading financial institutions in the MENAT region, since 2019. The Parent Company Bank expanded its customer base in 2013 by acquiring Citi Türkiye's Retail Banking Division, and in 2021 established NEOHUB with a focus on entrepreneurship.

The Group comprises DenizBank, along with six domestic and two international financial subsidiaries, five domestic non-financial subsidiaries, and two branches in Bahrain and Kyrenia. Adopting a customer-focused service philosophy, DenizBank structures its operations to meet all its customers' financial needs according to specific segments, operating under the Retail Banking, Corporate and Commercial Banking, and SME and Agricultural Banking Groups. Together with the Group, it offers products and services in the areas of financial leasing, factoring, investment and asset management, international banking and technology.

With an extensive service network, the Group employs 14,728 qualified employee as of 2025. DenizBank, a subsidiary of the Group, has a total of 576 branches in Türkiye, Kyrenia and Bahrain, whilst its Vienna-based subsidiary, DenizBank AG, has a total of 13 branches in Austria and Germany. The Group operates in EU countries through DenizBank AG, whilst DenizBank Moscow provides services abroad to its existing customers trading with Russia.

Operating on the principle of benefiting society and people, DenizBank places sustainability at the heart of its business strategy, supporting SMEs, producers, women entrepreneurs and the transition to a low-carbon economy. It makes significant investments in culture and the arts, and acts as the main sponsor of several state symphony orchestras and the State Choir.

Parent Company and Affiliates

Within the framework of DenizBank and its affiliated companies, in line with the materiality criteria of the TSRS, the sustainability topics covered in TSRS 1 and the climate-related material information set out in TSRS 2 have been addressed across the Group as a whole to meet the TSRS obligations, given DenizBank's position as the parent company. To ensure these obligations are met, the sustainability initiatives carried out at the Parent Company Bank level during the reporting period have been rolled out across the entire the Group, and these initiatives have been adopted as a reference. The sustainability practices, which are positioned to cover the entire the Group, have been made available for use in the sustainability-related financial disclosures of Deniz Yatırım, a subsidiary within the Group that is subject to TSRS obligations[1].

[1] The companies marked with an asterisk (DenizBank A.Ş. and Deniz Yatırım Menkul Kıymetler A.Ş.) are subject to TSRS obligations.

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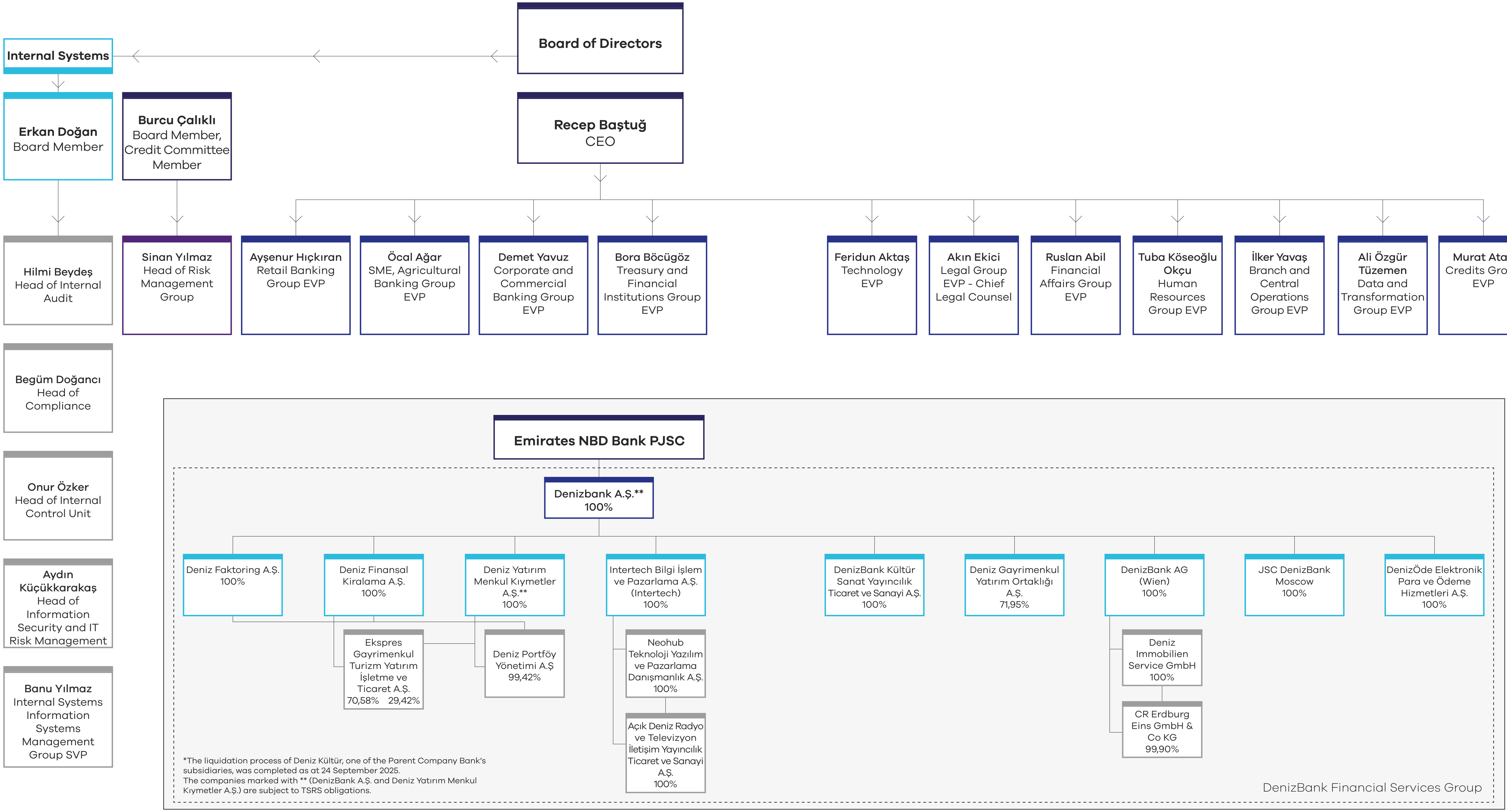

*The liquidation process of Deniz Kültür, one of the Parent Company Bank's subsidiaries, was completed as at 24 September 2025.
The companies marked with ** (DenizBank A.Ş. and Deniz Yatırım Menkul Kıymetler A.Ş.) are subject to TSRS obligations.

About DenizBank

Business Model and Value Chain

The Group offers a wide range of products and services, including banking, financial leasing and factoring, financial technology, information technology, digital payments, investment activities and a property investment trust. The Group, which operates in Türkiye Russia, Austria, Germany, the Turkish Republic of Northern Cyprus and Bahrain, has defined its value chain in line with the TSRS 1 standard, distinguishing between upstream and downstream operations, and has mapped these to its subsidiaries and associates as shown in the table below.

Upstream

ENBD: Equity holder

Suppliers of Goods, Services, Technology and Infrastructure: Office and physical infrastructure, energy and hardware providers

Intertech: Service provider responsible for the establishment, maintenance and improvement of banking and financial infrastructure across the DFSG

Public Institutions and Regulators: Regulators and supervisory bodies

Direct Operations

Senior Management, Staff and Branch Personnel: Employees within DFSG

Board of Directors and Committees: Corporate Governance

Core Activities – Banking Services (DenizBank, DenizBank AG (Austria), DenizBank Moscow): Operations in the retail, commercial, corporate, SME and agricultural banking sectors as a banking service provider in Türkiye, Europe and Russia

Branch and ATM Network: Branch and ATM network in Türkiye, Europe and Russia

Mobile Banking: Digital operations network

Core Activities – Financial Partners (DenizLeasing, DenizFaktoring, NEOHUB/DenizÖde, Intertech, Deniz Yatırım, DenizPortföy, Deniz Real Estate Investment Trust): Leasing, factoring, portfolio management, IT, investment banking, REIT, payment services

Other Activities – Non-Financial Partners (Ekspres Real Estate Tourism Investment): Culture and the arts, publishing and tourism

Downstream

Retail Banking Customers (DenizBank, Deniz AG (Austria), DenizBank Moscow): Individual and corporate customers using banking services

Corporate and Commercial Banking Customers (DenizBank, DenizLeasing, DenizFaktoring): Large-scale companies, commercial enterprises, large businesses utilising financial leasing and factoring services, and customers in foreign trade and project finance

Investment Banking Customers (DenizBank, Deniz Yatırım, DenizPortföy, Deniz GYO): Capital market investors, corporate and property investors

Agricultural and SME Banking (DenizBank, DenizLeasing, DenizFaktoring): SMEs, SMEs utilising financial leasing and factoring services, customers of sustainability-focused products and services

Digital Banking Customers (NEOHUB, DenizÖde): Customers of digital payment, financial technology and cloud infrastructure services

Governance

DenizBank Sustainability Governance Structure

DenizBank operates with a proactive and dynamic governance structure to manage sustainability and climate-related risks and opportunities.

The sustainability agenda is effectively embraced across the organisation and managed within a structured governance framework that supports its implementation. The Parent Company Bank implements its sustainability governance through a multi-layered organisational structure encompassing strategic direction-setting, corporate oversight and operational implementation. Sustainability governance also covers the subsidiaries and associates consolidated within the Group. Across the Group, sustainability and climate-related issues are addressed and managed in line with defined common strategies and targets. An inclusive approach is adopted in decision-making mechanisms relating to sustainability. Within the Group, sustainability and climate-related issues are assessed from a holistic perspective, ensuring coordination across relevant units and areas of responsibility, rather than being limited to specific areas of activity. This supports the systematic integration of sustainability objectives into decision-making processes and the establishment of a consistent standard of implementation across the Parent Company Bank. The Group's approach to managing risks and opportunities related to its sustainability and climate agenda is maintained through a proactive governance model capable of adapting to evolving needs. In this regard, the roles and responsibilities of the relevant governance bodies, as well as the allocation of tasks concerning the monitoring, assessment and oversight of sustainability and climate-related risks and opportunities, are defined. This ensures that the sustainability agenda is continuously monitored at an organisational level. At DenizBank, the processes for the effective implementation, monitoring and oversight of sustainability and climate-related issues are the responsibility of the Board of Directors at the highest level. These processes are carried out through the Sustainability Committee, which reports directly to the Board of Directors.

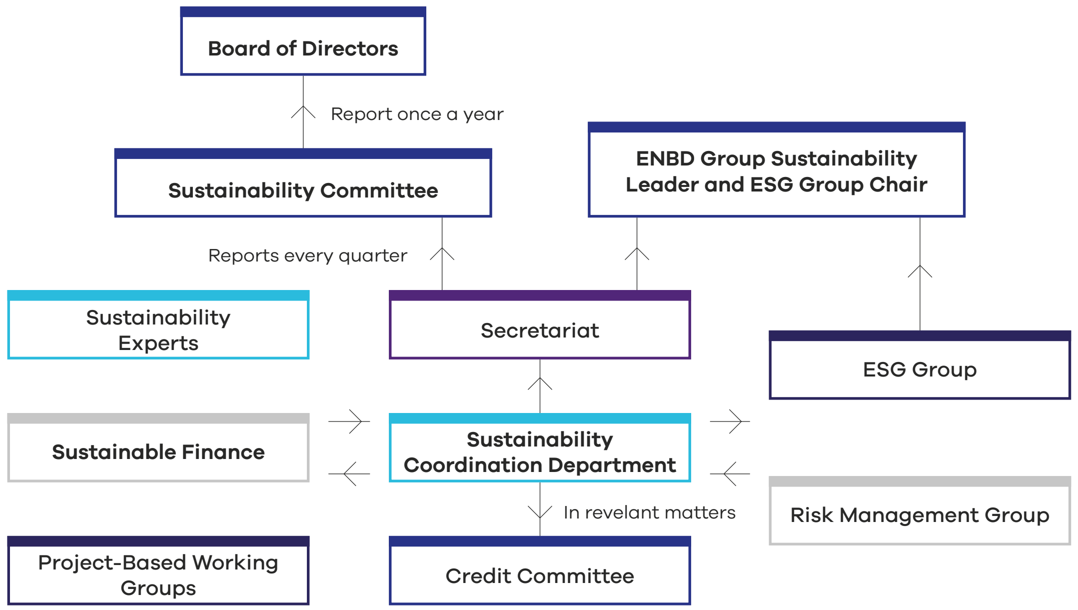

Figure 1. DenizBank Sustainability Governance Structure

Governance

Duties and Responsibilities of the Board of Directors

The DenizBank Board of Directors ensures that common principles and approaches are adopted in strategic decisions and practices relating to sustainability and climate-related issues. The Board of Directors assumes ultimate responsibility for the implementation, monitoring, management and oversight of the Group Climate Risk Policy. Furthermore, it carries out governance and oversight activities regarding environmental and social risks through the Sustainability Committee. The Board of Directors fulfils its responsibilities within the framework of sustainability and climate governance through the Executive Committee, the Audit and Risk Committee, the Sustainability Committee, the Credit Committee, and the Asset and Liability Committee (ALCO). The Sustainability Committee acts as an overarching committee responsible for the overall governance of all work in the areas of sustainability and climate-related issues.

The Board of Directors comprises nine members, two of whom serve on the Executive Committee.

In its processes for identifying and assessing risks and opportunities related to sustainability and climate change, the Group evaluates the impact of decisions taken on various stakeholder Groups, environmental and social issues, and financial performance. In this context, the relevant business units and the Sustainability Committee review whether activities aimed at achieving sustainability targets create potential trade-offs. These assessments cover situations such as the occurrence of negative social or economic outcomes whilst environmental benefits are being realised, or where one sustainability objective has a negative impact on another. No significant trade-offs were identified as a result of the reviews carried out during the reporting period.

Committees and Departments Supporting the Board of Directors

The Board of Directors receives support from various committees to effectively carry out strategic decision-making and governance processes relating to sustainability and climate-related issues.

Committees Responsible for Climate Risk Management within the Group

Board of Directors Level	Audit and Risk Committee	It monitors the compliance of all units within the Group with the Climate Risk Policy.
Board of Directors Level	Sustainability Committee	It ensures the implementation and development of DenizBank's Sustainability Strategy and monitors sustainability performance. The Committee provides integrated high-level governance across all sustainability-related activities, including the Parent Company Bank's environmental and social risk management and climate change management.
Board of Directors Level	Credit Committee	Within the scope of credit delegation authority, the Committee reviews credit and investment proposals in line with Environmental and Social Policies as part of the credit review and approval processes, and makes decisions regarding environmental and social risk impacts through the Risk Assessment Process.
Executive Level	Asset and Liability Committee	In line with its remit, the Committee ensures the management of market and liquidity risks arising from sustainability and climate-related risks by reviewing and approving relevant policies and methodologies.
Executive Level	Executive Board	It leads the development and direction of the environmental and social risk strategy.

Sustainability Committee (Committee)

Oversight of the Group's sustainability, climate change and environmental and social risk management activities is provided by the Board of Directors. The Parent Company Bank treats sustainability as an integral part of its corporate governance structure and integrates it into strategic decision-making processes.

The sustainability strategy, risks and opportunities arising from climate change, environmental and social risk management, decarbonisation targets and matters relating to sustainability performance are regularly monitored and assessed at Board level.

The Group's sustainability governance is carried out through the Sustainability Committee, which operates under the direct authority of the Board of Directors. The Committee acts as a high-level committee responsible for the overall management of all sustainability-related activities. The Sustainability Committee meets at least four times a year to monitor developments in the field of sustainability, assess the effectiveness of processes and provide guidance. The Committee reviews sustainability activities and targets at least once a year, revising them where necessary, and informs the Board of Directors. In this context, sustainability performance and the achievement of targets are monitored, and an assessment is made of whether the Sustainability Management System is being implemented effectively. The work carried out by the Committee and the results of its assessments are reported to the Board of Directors at least once a year, with additional updates provided where necessary.

The Committee is chaired by the General Manager. The Committee comprises 13 members from the Parent Company Bank's Senior Management. When a committee member is unable to perform their duties for any reason, the Committee Chair appoints another manager from the Parent Company Bank to take on the relevant role.

DenizBank Sustainability Committee Members

Board Member and Chief Executive Officer (CEO)	Chairman of the Board
Board Member and Executive Committee Member Responsible for the Credit Risk Group (CRO)	Member
Board Member Responsible for Internal Systems	Member
Executive Committee Member Responsible for the Finance Group – CFO	Member
Executive Committee Member Responsible for the Treasury, Financial Institutions and Investment Group - CFO	Member
–Loans Group - VP	Member
Group Sustainability Director (GCSO)	Member
Corporate and Commercial Banking Group – VP	Member
SME and Agricultural Banking Group – VP	Member
Human Resources and Deniz Academy Group – VP	Member
Head of the Risk Management Group	Member
Head of Strategy and Planning Group	Member
Coordinator for Financial Institutions and Sustainability Coordination	Member and Secretary

Governance

The Committee Secretariat is managed by the Committee member to whom the Sustainability Coordination Department reports. The Secretariat's operational processes are managed by the Sustainability Coordination Department. In this context, meeting agendas are circulated to Committee members in advance, meeting minutes are shared with relevant parties, follow-up on decisions taken is carried out, and processes relating to the implementation of decisions are monitored, with regular feedback provided to the Committee.

Sustainability Governance Structure and Organisational Responsibility Allocation

E&S Assessment	Risk Management	Sustainability Coordination
Assessment of the environmental and social risks of loans	Assessment of risks arising from climate change	Coordination of the sustainability strategy and governance structure
Implementation of risk assessment approaches differentiated by maturity and loan amount	Measuring and quantifying climate risks	Conducting environmental, social and governance (ESG) reporting
Integration of environmental and social risks into credit allocation and monitoring processes	Calculation and monitoring of financed emissions	Management of operational environmental impacts
Management of sustainable finance activities		Conducting stakeholder communication and engagement processes

The Sustainability Committee is responsible for the development, implementation and monitoring of the Group's sustainability strategy. In this context, the Committee;

- Defines and reviews the Group's sustainability strategy and targets, and ensures the effectiveness of the sustainability governance structure.
- Ensures that the Group's economic, environmental, social and governance impacts are managed in accordance with national and international regulations and recognised principles.
- Monitors and assesses the Group's environmental, social and governance performance, and takes decisions aimed at mitigating adverse impacts.
- It ensures the development of the Group Sustainability Policy and complementary policies, submits them to the Board of Directors for approval, and implements and monitors the approved policies.
- The Group sets performance targets in line with its sustainability strategy, monitors the extent to which these targets are met, and updates them where necessary.
- The Group carries out initiatives aimed at improving its corporate sustainability performance and, where necessary, assigns relevant units, Groups or employee to these tasks.
- To ensure the integration of the sustainability framework into business processes, it establishes the Sustainability Management System, submits it to the Board of Directors for approval, and monitors the system's effectiveness to ensure continuous improvement.
- It manages environmental and social risks, as well as the risks and opportunities arising from climate change, within the framework of the Group Climate Risk Policy.
- It develops the Group's decarbonisation strategy, monitors the work carried out within this framework, and ensures its implementation.

The Sustainability Committee meets at least four times a year, as part of its duties and responsibilities, to monitor developments in sustainability and climate-related areas, assess the effectiveness of initiatives and provide guidance. The work carried out by the Committee and the decisions taken are reported in writing to the Board of Directors at least once a year and, where deemed necessary, on additional occasions.

The Committee carries out oversight activities aimed at monitoring and managing sustainability and climate-related risks and opportunities. The Audit Committee, meanwhile, ensures the continuous development of audit expertise regarding these risks and opportunities. In this context, priority is given to the participation of personnel working in the relevant structures in training and certification programmes.

Sustainability Coordination Department

The Sustainability Coordination Department is structured as a team operating under the Coordination of Financial Institutions and Sustainability Coordination Group, and reporting to the Structured Finance and Sustainability Coordination Group Directorate. The Department monitors the processes relating to the decisions of the Sustainability Committee and carries out the duties of the Committee Secretariat.

The Division operates within the framework of DenizBank's vision, mission and sustainability strategy, and aims to promote this approach across the Group. It coordinates all sustainability initiatives, carried out with the involvement of internal and external stakeholders, particularly the Sustainability Committee. The department monitors the processes for implementing decisions taken by the Sustainability Committee and acts as the Committee's secretariat. In this context, it tracks national and international sustainability developments and best practices in the financial sector, and carries out coordinated work with relevant business units on sector-specific sustainability developments.

Within the framework of the Sustainable Management System (SMS) implemented by the Parent Company Bank, three policies and seven procedures are currently in force, and these documents are reviewed and updated annually. The Sustainability Coordination Department, continued its work throughout 2025 to develop the Sustainability Management System (SMS), integrate it into business processes and ensure its continuous improvement, and aims to complete this work in the coming periods. Under the DenizBank SMS framework, internal and external stakeholders are engaged in the processes, their views are sought, and these are integrated into sustainability and climate-related initiatives. Initiatives to raise employees' awareness of sustainability in general and the Parent Company Bank's sustainability strategy in particular are carried out through the relevant business units and partnerships. In this regard, the Parent Company Bank contributes to the planning and implementation of training, communication and awareness-raising activities that support the sustainability vision both within and outside the Parent Company Bank.

Sustainability Management System

Policies	Procedures
Policy on the Management of Direct Environmental and Social Impacts	Procedure for the Assessment of Direct Environmental Performance
Policy on the Management of Environmental and Social Impacts in Lending Processes	Procedure for the Management of Environmental and Social Risks in Credit Processes
Sustainability Policy	Communication and Sustainability Reporting Procedure
	Sustainability Management System Performance Assessment Procedure
	Procedure for Monitoring Environmental and Social Legislation
	Procedure for Setting Objectives and Targets
	Internal Control Procedure

Governance

The Sustainability Policy defines the Parent Company Bank's approach to sustainability under the headings of social, environmental and governance sustainability; it is based on the regular monitoring of sustainability performance within the framework of the SMS's policies and procedures, and on the conduct of activities under the supervision of the Sustainability Committee.

The Policy on the Management of Direct Environmental and Social Impacts sets out the Parent Company Bank's fundamental approach to monitoring and mitigating environmental and social impacts arising from its operational activities, recording energy and resource consumption performance, tracking GHG emissions, and encouraging stakeholders, including suppliers, to adopt sustainability practices.

The Policy on the Management of Environmental and Social Impacts in Lending Processes regulates the management of indirect environmental and social impacts arising from the Parent Company Bank's products and services within lending processes, the exclusion of non-financed activities, the subjection of certain loan applications to an environmental and social risk assessment model, and the monitoring of relevant impacts.

Procedure for the Assessment of Direct Environmental Performance, defines the measurement of the Parent Company Bank's environmental performance at its head office, regional offices and branches using key performance indicators such as electricity, natural gas, water, fuel, paper and waste; the collection, recording and verification of data from relevant units; and its inclusion in the performance assessment process to be presented to the Sustainability Committee.

The Environmental and Social Risk Management Procedure in Credit Processes, sets out, on a unit-by-unit basis, the steps for verifying non-financed activities in loan applications across the agricultural, SME, commercial and corporate segments; customer declarations; environmental and social risk assessment; determination of risk categories; the development of environmental and social action plans; their incorporation into the loan file; and monitoring throughout the loan term.

The Communication and Sustainability Reporting Procedure ensures that processes relating to internal and external communication on sustainability issues, training activities, the complaints and suggestions mechanism, requests for reporting data, the consolidation of annual data, and the preparation and publication of the sustainability report are carried out in coordination with the Sustainability Coordination Department, Investor Relations, Corporate Communications, Human Resources, Deniz Academy and relevant working Groups.

Sustainability Management System Performance Assessment Procedure, defines the preparation of the year-end SMS performance assessment presentation to evaluate whether the processes within the SMS are operating in line with the Parent Company Bank's sustainability strategy and policies, consultation with working Groups, submission to the Sustainability Committee, and the distribution of results and decisions to relevant stakeholders.

The Environmental and Social Legislation Monitoring Procedure, regulates the process of monitoring legal and other requirements relating to environmental and social issues; sharing legislative changes with the Sustainability Coordination Department and the relevant credit/project finance units; assessing these changes within the framework of the SMS; and informing the relevant internal stakeholders to plan the necessary actions.

The Target and Objective Setting Procedure, sets out the process for preparing objectives and targets for the Parent Company Bank's sustainability activities and continuous improvement, taking into account existing sustainability principles, relevant policies, SMS key performance indicators, and risks and opportunities; for obtaining feedback from senior management; for approval by the Sustainability Committee; and for the annual assessment of progress.

The Internal Control Procedure, sets out first- and second-level controls, sample-based controls carried out by the Internal Control and Compliance Group, the reporting of findings, the monitoring of corrective and preventive actions, and the sharing of a summary of the internal control report with the Sustainability Committee, with the aim of ensuring that SMS activities are carried out effectively and in accordance with relevant procedures. In 2025, the TSRS-compliant sustainability report was included in the internal control agenda. The aim is to continue work towards bringing sustainability and climate-related processes within the scope of internal control from 2026 onwards.

The department is responsible for all processes relating to the calculation of emissions arising from the Group's operations. It also plays an active role in the processes of defining the Parent Company Bank's sustainability and climate-related targets in line with its sustainability strategy, in collaboration with the relevant business units, and in designing actions to achieve these targets.

Studies on sustainability and climate-related risks and opportunities is carried out under the coordination of the Finance Group and the Groups responsible for internal systems; within this framework, the Department collaborates with relevant units to understand these risks and opportunities, develop scenarios and assess their financial impact.

The department monitors sustainability and climate-related standards, policies and reporting requirements. As part of sustainability and climate-related reporting, the Department carries out processes to ensure data reliability in coordination with business units, including data production processes such as the calculation of GHG emissions, data collection processes such as requesting relevant data from stakeholders, and third-party assurance processes for data in reporting procedures. By monitoring developments in local and global sustainability regulations, it analyses their potential impact on the Group and tracks compliance processes relating to sustainability commitments and international initiatives. Furthermore, within the scope of sustainability, the department leads the preparation of external stakeholder reports, such as annual ESG reporting to International Financial Institutions (IFIs), reports compliant with international regulations, and feedback from indices and reporting initiatives, in conjunction with data and feedback from internal stakeholders such as teams, departments and business units, or acts as a stakeholder in the relevant processes.

The Sustainability Coordination Department operates under the leadership of the and the Coordinator of the Financial Institutions and Sustainability Coordination Group, with a core team comprising 8 full-time sustainability specialists and one coordinator.

Risk Management Group

DenizBank implements a structured risk governance model covering the identification, measurement, management, control and reporting of risks, with the aim of supporting risk-based decision-making and effective oversight in operational processes. Ultimate responsibility for the establishment, maintenance and development of the Parent Company Bank's risk management system lies with the Board of Directors.

The Board of Directors ensures that policies and frameworks relating to risk management are reviewed and approved. It determines the Parent Company Bank's risk appetite in line with its strategies and financial strength, monitors the effectiveness of the risk management system, and oversees the establishment and implementation of the Internal Capital Adequacy Assessment Process (ICAAP). The Board of Directors carries out its oversight of risk management processes across the Parent Company Bank through committees at Board level.

This governance structure is cascaded throughout the organisation via Executive Committees, business units and risk control functions. The Risk Management Group ensures that the risk perspective is comprehensively assessed in the Group's strategic decision-making processes and manages the risks to which the Parent Company Bank is exposed or is likely to be exposed using a systematic approach.

The key duties and responsibilities of the Risk Management Group include:

- Identifying, measuring, analysing and monitoring credit, market, liquidity and operational risks, with a particular focus on the risk-return profile of cash flows,
- Developing, implementing, monitoring and reporting on risk policies and procedures within the framework of the principles established by the Parent Company Bank's Senior Management and approved by the Board of Directors,
- Ensuring the coordination of activities carried out within the scope of the risk appetite statement,
- Providing regular reports to the Audit and Risk Committee, the Asset and Liability Committee, the Risk and Compliance Committee, the Credit Committee and the Model Risk Management and Validation Committee,
- Working in coordination with the Internal Control, Compliance and Audit Board.

Policies, procedures, limits and scenario analyses relating to the functioning of the Risk Management and Compliance Groups are discussed by the Risk and Compliance Committee. Policies are reviewed by this Committee prior to approval by the Board of Directors. Scenario analyses also encompass studies aimed at assessing climate change-related transition and physical risks under different time horizons and scenarios.

The Group reports risk analyses to the Audit and Risk Committee and the Asset and Liability Committee on a quarterly basis; these analyses form the basis for setting and monitoring risk limits and developing risk management strategies. The Audit and Risk Committee receives these reports quarterly, whilst the Assets and Liabilities Committee receives them weekly. It manages credit risk through a holistic approach encompassing modelling, validation, analysis, assessment and monitoring processes. In

Governance

credit risk assessment processes, customers' sustainability performance, their exposure to climate-related transition and physical risks, and their regulatory compliance obligations are also taken into account; these factors are integrated into the credit granting, monitoring and pricing processes.

Operational risk management is carried out under the responsibility of each business unit. Policy-setting, monitoring and reporting activities are carried out in coordination with the Internal Control, Compliance and Audit Committee. Operational risks related to sustainability and climate change are addressed in a manner that encompasses the potential impacts of physical climate events on the Parent Company Bank's own operations and infrastructure, as well as regulatory compliance risks and risks relating to sustainability reporting and data quality processes, and are integrated into the operational risk framework. Operational risk assessments are addressed by the Audit and Risk Committee. The Parent Company Bank conducts its banking operations within the framework of risk management policies that focus on analysing risk and monitoring it within the defined limits. DenizBank is committed to developing systems that are consistent with international risk management principles, particularly the Basel Committee on Banking Supervision and Risk Committee regulations. In this context, international frameworks such as the TSRS, TCFD recommendations and the Principles for the Management of Climate Risks are used as a reference for the integration of sustainability and climate risks into the existing risk management system.

The Parent Company Bank sets out the principles governing the determination, monitoring and reporting of risk limits in its Risk Appetite Statement. The document sets out the limits established for each risk category, the action plans to be implemented in the event of limit breaches, and the responsibilities of the relevant decision-making units and individuals. The Risk Appetite Statement is reviewed at least once a year and comes into force following approval by the Board of Directors. The Parent Company Bank monitors the actual performance against the metrics set out in the document at varying intervals depending on the risk type and reports on this on a monthly basis.

Compliance with Corporate Policies and Procedures

DenizBank adheres to the policies and practices applicable across the Group in order to ensure the regular monitoring and effective implementation of the governance framework, which is a key component of corporate sustainability and TSRS obligations as at the reporting period.

Issues prioritised in line with the TSRS materiality criteria across the Group are managed in accordance with the relevant policies, strategies and frameworks.

Within this framework;

- Environmental Impact Financing practices are implemented in accordance with the DenizBank Sustainability Policy, the DenizBank Policy on the Management of Direct Environmental and Social Impacts, the Policy on the Management of Environmental and Social Impacts in Credit Processes, and the DenizBank List of Non-Financed Activities as set out in.
- Responsible services and products are developed within the framework of the DenizBank Sustainable Finance Framework.
- Access to Financial Services is addressed in collaboration with the relevant business lines and units within the Parent Company Bank, in line with the DenizBank Sustainability Strategy.
- Talent attraction and retention processes are managed in accordance with the Remuneration Policy and the Human Resources Policy.
- As part of the Climate Action initiative, Group-wide calculation metrics are used as a basis. The Decarbonisation Strategy processes carried out within DenizBank are monitored and managed.
- The Climate Risk Policy has been implemented as of the reporting period and is being integrated into the Parent Company Bank's governance, risk management and decision-making processes relating to climate risks.

Within the Group, the monitoring and management of risks and opportunities relating to sustainability and climate change are carried out by the Sustainability Committee, whilst the Audit Committee is responsible for the audit and oversight of processes in these areas.

As part of its sustainability governance structure, DenizBank establishes corporate policies and frameworks to ensure the effective management of environmental, social and climate-related risks and opportunities. These policies come into force following approval by the Board of Directors. The Sustainability Committee is responsible for monitoring, implementing and updating these policies. These policies are integrated into the Parent Company Bank's business model, credit and investment processes, and operational activities. The policies serve as key governance tools for monitoring sustainability performance.

[2] In this context, access to the corporate policies covering the Group is available via DenizBank investor relations page.

Corporate Competence in Sustainability and Climate Issues

The Group is undertaking initiatives to develop the organisational capabilities required to effectively manage risks and opportunities related to sustainability and climate change. In this regard, capacity-building activities are being carried out across the organisation to strengthen the knowledge base of teams responsible for sustainability management, closely monitor sectoral developments and support compliance with relevant regulatory expectations. To enhance the expertise of team members involved in sustainability governance, participation is facilitated in training and certification programmes organised in areas such as sustainable finance and environmental and social risk management. Employees from various functions within the organisation participate in various training programmes at to both develop their technical knowledge in the field of sustainability and acquire competencies aligned with sector practices.

A member of the Sustainability Committee, who serves as the Coordinator of the Financial Institutions and Sustainability Coordination Group, attended the "Sustainable Finance: ESG and the Future of Finance" training programme and was awarded a certificate. In addition, two employees from the Audit team successfully completed the "Sustainability Expertise Certification Programme" run by the Capital Markets Association of Türkiye (TSPB) and received their certificates.

One member of the Sustainability Coordination Department successfully passed the Corporate Sustainability Reporting Expertise (KSRU) examination, organised for the first time in 2025 by the POA, thereby qualifying for the expert licence.

Sustainability and climate-related risks are regarded as a dynamic and rapidly evolving field that is gaining increasing importance in the markets and among regulatory authorities in the countries where the Group operates. In this context, it is anticipated that new regulations addressing sustainability and climate-related risks will become more widespread, and that stakeholders in the sector will have heightened expectations regarding compliance. To prepare for this transformation, the Group is embedding structured training programmes, designed to enhance employees' awareness and practical competence regarding sustainability and climate-related risks, as an integral part of its corporate culture.

The capacity-building approach implemented encompasses both basic-level awareness initiatives covering all employees and role-specific training content designed for specific business lines and job descriptions. The aim of these training programmes is to ensure that employees have a basic understanding of the potential impacts of sustainability and climate-related risks on the Parent Company Bank, its customers and stakeholders. Furthermore, the aim is to enhance the knowledge levels of employee working in business lines that may be more significantly affected by environmental and social risks, regarding the relevant frameworks and requirements.

The training content is structured to cover key topics such as environmental and social risk management, types of risks arising from climate change, regulatory requirements relating to sustainability and climate-related risks, risk assessment methodologies, and monitoring and management processes.

Deniz Akademi assumes a coordinating role in the planning and implementation of the training programmes, working in collaboration with relevant internal stakeholders and, where necessary, external experts during the preparation and updating of training materials. The Parent Company Bank encourages participation in the training programmes at departmental level under the supervision of senior management and ensures the monitoring of metrics to measure training performance. In 2025, 4 employees from DenizBank took part in a sustainability training course organised by the Integrated Reporting Association (ERTA).

As part of the development and implementation of the ESG training agenda within the Group, in addition to general awareness training covering all employee, programmes covering areas such as sustainability coordination, risk management and investor relations for Senior Management, with the contribution of relevant teams, as well as role-based technical training (CFA, GARP, etc.) are planned to be implemented. The effectiveness of these training programmes is assessed using metrics such as participation rates, completion rates, assessment results measuring knowledge acquisition, and post-training performance improvements; continuous improvement is ensured through the monitoring of these indicators.

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Remuneration Processes

The Group incorporates sustainability and climate-related targets into Senior Management performance appraisal processes to ensure that the priorities set out in its sustainability strategy are effectively reflected in corporate decision-making mechanisms. The Parent Company Bank does not limit sustainability and climate-focused performance indicators to operational practices alone; rather, it links them to Senior Management accountability and leadership performance, and makes them trackable within the corporate governance framework.

These performance indicators are monitored as part of the annual performance appraisal cycle and are supported by interim assessments throughout the year. Performance results are assessed holistically against criteria such as contribution to sustainability targets, the risk management approach and long-term strategic alignment.

The sustainability and climate-focused targets included in senior management's scorecards are addressed in line with the DFSG Remuneration Policy, which is publicly available. The annual performance outcomes relating to these indicators are monitored, and the relevant bonus allocation process is carried out accordingly. Performance assessment processes for 2025 are currently ongoing. When determining bonus and incentive payments, consideration is given not only to short-term financial results but also to the contribution made towards sustainability and climate-related targets, as well as the impact on the Parent Company Bank's long-term performance. Performance assessment results are reviewed by the Remuneration Committee and reflected in the final decision-making processes under the supervision of the Board of Directors.

The Parent Company Bank regularly monitors progress towards sustainability and climate-related targets and reflects the results in its remuneration mechanisms. Sustainability indicators not directly incorporated into remuneration are tracked as monitoring metrics to support decision-making processes and are regularly presented to senior management as part of management reporting. Furthermore, transparency is ensured by disclosing information on the criteria considered in performance-based payments and the relevant implementation principles to the public via annual activity reports and related policy documents.

Setting Sustainability and Climate Targets and Performance Management

Sustainability targets, which encompass environmental and social dimensions, are integrated into the performance scorecards of the General Manager and Deputy General Managers. Designed to align with the areas of responsibility of the relevant managers, these targets carry a specific weighting within the Senior Management performance measurement system and have a direct impact on annual remuneration processes. In this context, the weighting of ESG-related targets within the overall performance assessment has been set at 10%. The defined focus areas reflect a holistic and multi-dimensional transformation approach, in line with the Parent Company Bank's ESG priorities, covering a broad spectrum ranging from operational processes to financing activities, and from risk management to stakeholder engagement.

In line with the ENBD, the performance indicators defined within the Group have been established within a measurable framework directly linked to strategic targets. In this context, each metric is weighted, and performance is assessed against pre-defined tolerance levels. These tolerance levels consist of the categories "In Line with Target" (100%), indicating that the target has been met as expected; "Above-Target Performance" (110–120%), indicating that the target has been exceeded; and "Outstanding Performance" (>120%), representing an even higher level of performance.

This tiered performance evaluation approach aims not only to monitor the achievement of targets but also to strengthen a culture of continuous improvement across the organisation. Furthermore, by contributing to the integration of sustainability and ESG-focused targets into the corporate performance management system, it supports management at all levels in acting in line with strategic priorities and ensures that performance is systematically monitored.

Strategy

Under the leadership of ENBD, DenizBank is integrating its sustainability approach into its business model, thereby incorporating sustainability and climate-related risks and opportunities into strategic decision-making processes. ENBD's strategic framework is built on a holistic structure that encompasses regulatory requirements, operational transformation, the management of financed emissions and climate-focused decision-making processes, all in line with net-zero targets.

In line with this, the strategy focuses on key areas such as reducing operational emissions, managing emissions arising from the loan portfolio, and developing sustainable financing solutions. At the same time, the aim is to achieve compliance with international standards by establishing a robust framework for monitoring and reporting on sustainability performance.

Furthermore, the Group's approach to assessing risks related to climate change is addressed within a broader framework that also encompasses physical risks. Under the ICAAP framework, climate risk is defined as a risk area assessed in terms of its potential impacts on the business model, cash flows, financial position and financial performance, including both physical risks and transition risks. Accordingly, physical risks are addressed as part of the assessment approach to understand the potential impacts of climate change on assets, customers, sectors and economic activities; transition risks, meanwhile, are monitored in the context of regulatory developments, market expectations and the transition to a low-carbon economy.

Time Horizons

Within the scope of the Group, time horizons covering the short-, medium- and long-term have been defined to ensure that assessments relating to sustainability and climate change can be carried out in a consistent and comparable manner. In determining these time horizons, consideration was given to the planning periods, cash flows, investment plans and strategic decision-making processes commonly used within the sectors in which the Group operates, as well as the definitions provided by international organisations.

As of the 2025 reporting period, changes have been made to the short-, medium- and long-term time horizons. The time horizons have been structured taking into account sustainability and climate-related risks and opportunities. Accordingly, whilst the short-term period has been addressed in a manner consistent with financial planning processes and annual budget cycles, the medium term has been defined by taking into account the impacts of sectoral transformations, technological developments and changes in business models. The long-term timeframe, meanwhile, has been addressed from a broader perspective, taking into account macroeconomic developments, sectoral transformations and global sustainability trends, and has been structured to form the basis for strategic assessments.

The update to the time horizon definitions was carried out to bring the report more into line with international best practice and the principles of comparability. Whilst in the previous reporting period the short term was defined as 0–2 years, the medium term as 3–9 years and the long term as 10 years or more, for the 2025 reporting period these definitions have been adjusted to 0–1 years for the short term, 1–5 years for the medium term and 5 years or more for the long term. The aim of this change is to enable more precise and operational-level monitoring of climate-related risks and opportunities that may arise. At the same time, it ensures a clearer distinction between medium- and long-term impacts. An analysis of time horizon definitions as set out by international organisations and market practices, such as the World Bank, the Intergovernmental Panel on Climate Change (IPCC), the Task Force on Climate-related Financial Disclosures (TCFD), the World Economic Forum (WEF) and the Science Based Targets initiative (SBTi), has been carried out to help the Group position the time perspective more effectively in its strategic planning, risk management and scenario analysis.

In this context, details regarding the defined time frames are presented below;

Short-term, compliance efforts with climate legislation, operational actions and financial planning processes aligned with budget cycles form the basis of the short-term timeframe. In this context, the risks and opportunities addressed in the short term encompass factors that could have a direct impact on the Group's financial performance and operational results during the relevant reporting period.

Medium term, is characterised by structural changes observed in the sector, technological transformation processes and strategic planning cycles. During this period, risks and opportunities arising from operational resilience, evolving business models and shifts in customer expectations are assessed within a comprehensive analytical framework and form the basis for strategic guidance.

Long term, is underpinned by structural transformations driven by climate change, alongside national and international commitments. During this period, risks and opportunities that could impact the sustainability of the business model, capital allocation decisions, and long-term financial resilience are addressed at a strategic level and assessed from a comprehensive perspective.

Time Horizon	Definition
Short Term	0–1 Year
Medium Term	1–5 Years
Long Term	>5 Years

Sustainability and Climate-Related Risks and Opportunities

During the reporting period, the inventory of sustainability and climate-related risks and opportunities was reassessed. The inventory was prepared in line with the risks and opportunities disclosed by international and national organisations, sectoral and peer analysis studies, and Group's own work. All headings were reviewed in line with impact and likelihood criteria, and prioritisation was carried out by examining the Group's actions, as well as their impact on strategy and decision-making processes, cash flow, access to finance and the cost of capital. The aim of this work is to ensure that disclosures are presented in a structure that is more comprehensible, comparable and more closely linked to decision-making processes, whilst also enhancing the effectiveness of monitoring and reporting. It supports the provision of a more focused and transparent presentation to stakeholders.

The sustainability and climate-related risks and opportunities disclosed in the previous reporting period continue to be monitored within the Group's risk and opportunity framework. However, during the comprehensive reassessment process carried out in the current reporting period, the materiality levels of these risks and opportunities have been re-determined by taking into account stakeholder expectations, regulatory developments and the results of scenario analysis, alongside the application of an updated financial materiality methodology, an expanded value chain analysis and the holistic application of qualitative and quantitative assessment criteria. As a result of this assessment, the sustainability and climate-related risks and opportunities deemed material by the Parent Company Bank are presented in this section. Other risks and opportunities that fall below the materiality threshold but are still monitored within the risk and opportunity landscape are brought to the attention of Senior Management to support the Parent Company Bank's decision-making processes and are retained within the monitoring scope of the reporting processes.

Risk and opportunity assessments were conducted for the entire the Group; however, since they did not meet the materiality threshold, they were not included in the risk and opportunity table for this period.

Strategy

Sustainability Risks and Opportunities

Sustainability Risks

Legal Risk – Cyber Security Risk

Risk Information

Type of Risk
Sustainability Risk

Description of the Risk
Cyber attacks may lead to operational disruptions and the payment of regulatory fines. Furthermore, a decline in customer confidence may increase revenue losses.

Risk Horizon
Short, Medium, Long

Value Chain Affected
Upstream

Expected Financial Impact
Indirect, Increase in Operational Expenditure (OpEx)

Scenario Analyses Used
RCP, IEA, SSP

Resilience
The Parent Company Bank maintains its resilience against this risk through a multi-layered defence architecture, 24/7 SOC monitoring, business continuity and disaster recovery plans, periodic penetration tests and drills, and Cyber Security Insurance. The resilience assessment is considered in terms of short-term (operational continuity), medium-term (DORA compliance) and long-term (preparedness for next-generation threats) dimensions.

Definition of the Risk

The growing prevalence of digitalisation projects and the increasing provision of banking services via digital channels are among the key factors increasing the Parent Company Bank's exposure to cyber threats. Scenario analyses indicate that cyber attacks may vary in terms of complexity and frequency; in particular, should vulnerabilities arise in the protection of customer data, the Parent Company Bank is expected to face data breaches, system outages and incidents of unauthorised access. Such incidents increase the risk of non-compliance with regulatory obligations, giving rise to legal and operational risks as well as negative impacts on the Parent Company Bank's reputation. Given the Parent Company Bank's operations within the Group, including DenizBank AG (Austria) and JSC DenizBank Moscow (Russia), this risk also carries a geographical concentration dimension, as it is subject to different regulatory regimes such as the EU General Data Protection Regulation (GDPR), the Digital Operational Resilience Act (DORA) and the Russian Federation's data localisation and cybersecurity legislation. In this context, the differences between sanctions regimes and the requirements relating to cross-border data flows are considered to be factors that increase compliance obligations.

Impact of the Risk on Cash Flow, Access to Finance and Cost of Capital

In the financial impact assessment carried out under the TSRS, the annual expected costs of cyber penalties were calculated under low, medium and high scenarios, taking into account the probabilities of data breaches—calculated on the basis of past occurrences—and penalty amounts indexed to 2025 prices. The calculated financial impacts remained below the materiality threshold—set at 5% of the Parent Company Bank's pre-tax profit—across all scenarios. As part of the same analysis, revenue losses resulting from operational disruptions were assessed on the basis of net fee and commission income; even under a 60-minute disruption scenario developed using a conservative approach, the calculated revenue loss remained below the specified materiality threshold.

These analyses have been conducted taking into account the impact of data breach fines and revenue losses resulting from operational disruptions on the Parent Company Bank's financials; the risk is expected to be reflected in cash flows primarily through fee and commission income, potential financial liabilities and incident response/system improvement costs (operating expenses). From an expenditure perspective, it is anticipated that incident response, forensic investigations, system improvements, cyber security insurance premiums and regulatory compliance expenditure will have a cost-increasing effect on operating expenses.

In terms of expenditure, the Parent Company Bank allocates a separate budget for the management of cyber security risks; this budget covers expenditure on security infrastructure and technologies, as well as software, licences, maintenance and support services, consultancy, security testing and awareness-raising initiatives. In this context, expenditure totalling 195.8 million TL was incurred in 2024, and 482.5 million TL in 2025. Of the 2025 expenditure, 205.0 million TL comprised capital expenditure (CAPEX), whilst 277.5 million TL comprised operating expenditure (OPEX). Expenditure was primarily directed towards key investment and action areas.

Under the Parent Company Bank's approved budget and medium-term financial plans, total cash outflow of approximately 1.9–2.0 billion TL is projected for cybersecurity initiatives during the 2026–2028 period. Annual expenditure is expected to follow an upward trend, rising from approximately 460 million TL to 825 million TL over the period. Planned expenditure includes initiatives to strengthen the security infrastructure, identity and access management, data security, the development of security monitoring and incident response capabilities, application and vulnerability security, and the enhancement of employee awareness.

When assessed by timeframe, in the short term, ransomware and DDoS-type attacks pose a risk of direct revenue loss due to operational disruption; in the medium term, compliance expenditure and cost increases arising from third-party risk management will come into play with the implementation of EU DORA obligations; whilst in the long term, new attack vectors linked to advanced technologies such as artificial intelligence and quantum computing are expected to increase the need for cybersecurity investment. The forecasts relating to these timeframes have been identified as priority action areas in the Parent Company Bank's cybersecurity investment plan for the 2026–2028 period and have been reflected in the budget planning.

Following a comprehensive assessment, it has been determined that these risks do not have a significant impact on the Parent Company Bank's total equity, risk-weighted asset size, cash flows, access to finance or cost of capital in terms of the financial materiality threshold. However, this risk is assessed as qualitatively significant for the Parent Company Bank in terms of customer confidence, reputation, operational continuity, exposure to regulatory sanctions and strategic priorities, and is therefore classified as a priority area for monitoring.

Within the scope of the impact of the risk in question on the Parent Company Bank, the extent of customer loss is also assessed. A potential cyber security breach or operational disruption carries the potential to have medium- and long-term adverse effects on fee and commission income, the deposit base and product cross-selling potential, through consequences such as erosion of customer trust, a decline in the use of digital channels, existing customers switching to rival banks and difficulties in acquiring new customers. The operational risk dimension of the same incident, meanwhile, has the effect of increasing operational expenses through disruptions to service continuity; incident response and forensic investigation costs; system improvement and restructuring expenditure; disruptions to processes reliant on third-party service providers; a reduction in workforce productivity; and additional obligations arising from regulatory reporting requirements. These two channels of impact are mutually reinforcing in terms of how cyber security risk affects the Parent Company Bank's financials, and both dimensions are addressed holistically within the Parent Company Bank's corporate risk management framework.

Strategy

Sustainability Risks and Opportunities

Sustainability Risks

Legal Risk – Cyber Security Risk

Actions Taken by DenizBank and the Impact of the Risk on Strategy and Decision-Making Processes

Cyber security risk is addressed in an integrated manner within the Parent Company Bank's strategy and decision-making processes under the headings of information security, operational resilience, third-party risk management, technology procurement, system development and business continuity. Within this framework, information security requirements are taken into account in procurement, technology sourcing, system development and maintenance processes; customised processes and tools are utilised to manage third-party IT and information security risks. Corporate policies and procedures established in the areas of access, information security, data classification, acceptable use, data retention, sharing and disposal support the systematic management of cyber security risks within day-to-day operations and decision-making mechanisms.

The Parent Company Bank implements multi-layered control mechanisms at network, application, database, endpoint and physical security levels to address cyber security risks. Network security is supported by firewalls, network segmentation, web application firewalls, DDoS protection, load balancers and intrusion detection and prevention systems, whilst application security is strengthened through vulnerability management, penetration testing, static code analysis, patch management and secure software development standards. Account and privileged account management, along with processes for defining, modifying, revoking and reviewing authorisations, are supported by system automation. Access logs are monitored and continuously tracked to detect potential information security breaches. Furthermore, awareness programmes covering employee, customers and external service providers are carried out. Tests and drills relating to business continuity and emergency management are carried out periodically.

With the aim of continuously improving the Parent Company Bank's cybersecurity maturity and resilience, a comprehensive annual Cybersecurity Maturity Assessment is conducted at ENBD Group level. Based on the internationally recognised NIST Cybersecurity Framework (NIST CSF), this assessment takes a holistic view of the Parent Company Bank's governance structure, risk management approach, technological capabilities, operational processes and level of preparedness against evolving cyber threats. For the areas for improvement identified as a result of the assessment, risk- and priority-based improvement actions are formulated, the necessary investments are planned, and the implementation status of these actions is regularly monitored by Senior Management. This ensures that cybersecurity resources are effectively directed towards critical risk areas, that investments are linked to measurable development targets, and that the Parent Company Bank's resilience against the evolving threat landscape is continuously strengthened.

During the previous reporting period, progress was made in implementing strategic and tactical projects aligned with the DenizBank Information Security Strategy, enhancing SOC (Security Operations Centre) capabilities, and strengthening third-party risk management processes, in line with the planned actions. In this context, process improvements aimed at raising the information security maturity level were continued during the 2025 reporting period. To manage the financial impact in the event of a cyber security breach, the risk transfer mechanism under the Cyber Security Insurance policy continued to be utilised.

As part of the trade-off assessment, the balance between the efficiency and customer experience gains delivered by digitalisation investments and the increased cyber attack surface resulting from these investments is explicitly taken into account in the Parent Company Bank's strategic decision-making processes. Within this framework, the balance between the pace of digital transformation and the capacity for cybersecurity investment is managed within the risk appetite framework at Board of Directors level. Whilst there is no separate investment, divestment or digitised resource allocation plan specific to cybersecurity risk, cybersecurity expenditure is managed by prioritising it within the Parent Company Bank's annual information technology investment budget. Accordingly, within the budget allocated for the management of cyber security risks, the Parent Company Bank has increased its investments in security infrastructure, monitoring and response capabilities by approximately 2.5 times between 2024 and 2025, and has adopted an investment plan that continues to grow in the same vein for the 2026–2028 period. This approach demonstrates that, whilst there is no separate investment or divestment plan specific to cyber security risk, cyber security expenditure is prioritised and managed within the Parent Company Bank's annual information technology investment budget.

With regard to the cyber security risk, which has continued to be monitored as a significant risk in the Parent Company Bank's risk inventory since last year, it is assessed that, whilst the complete elimination of this risk is not possible due to the nature of digitalisation investments, the aim is to manage it systematically to keep its financial and operational impacts at an acceptable level. Accordingly, the planned cybersecurity investment totalling approximately 2 billion TL for the 2026–2028 period is structured around five key action areas:

- Strengthening the security infrastructure and transitioning to a zero-trust architecture,
- Developing capabilities in identity and access management and privileged account management,
- Widespread adoption of data security, data leakage prevention and encryption solutions,
- Development of Security Operations Centre (SOC) capabilities, threat intelligence, security monitoring and incident response capacity,
- Application security, vulnerability management and raising employee awareness.

These actions are linked to the outputs of the NIST CSF-based Cyber Security Maturity Assessment carried out annually at ENBD Group level. Progress towards the defined maturity targets is regularly monitored by Senior Management. This holistic approach ensures that risk is maintained at a manageable level, whilst striking a balance between the reality that risk cannot be eliminated and the Parent Company Bank's digital transformation objectives.

Strategy

Sustainability Risks and Opportunities

Sustainability Risks

Earthquake Risk

Risk Information

Type of Risk
Sustainability Risk

Description of the Risk
Due to Türkiye's geographical location and the Parent Company Bank's operational concentration in the Marmara Region, where economic activity is concentrated, large-scale earthquake events could negatively impact the Parent Company Bank's employees, customers, service premises, infrastructure and superstructure assets, suppliers and service providers, thereby disrupting service continuity and potentially incurring significant financial costs.

Risk Horizon
Short, Medium, Long

Value Chain Affected
Direct Operations, Upstream, Downstream

Expected Financial Impact
Increase in operational costs (crisis management, business continuity, repair and refurbishment costs), loss of revenue, deterioration in loan repayments and rise in provisioning costs, erosion of collateral values

Resilience
The Parent Company Bank has established a multi-layered resilience framework in accordance with its Business Continuity Management Policy and Plan, Crisis Management Plan, Emergency Action Plan, Business Recovery Plans, IT Continuity Plan and the Procedure for Actions to be Taken by Employee in the Event of Natural Disasters. Regular testing and drill programmes, action plans based on "Lessons Learnt", the expansion of the Disaster Recovery Centre's capacity, the provision of geographical redundancy for critical employee and awareness-raising activities for employees (training, distribution of emergency kits, etc.) continuously strengthen the Parent Company Bank's resilience to earthquakes in the short, medium and long term.

Definition of the Risk

Disasters are natural or humanmade events that negatively affect people's normal lives, leading to loss of life and property, disrupting the operations and services of companies and organisations, and causing physical, economic and social losses. Due to our country's geographical location and topographical features, it is highly vulnerable to natural disaster threats, and the risks associated with potential disasters remain at a significant level. The earthquakes centred on Kahramanmaraş, the forest fires in the Mediterranean and Aegean regions, and the floods in the Western and Eastern Black Sea regions over the past five years have clearly demonstrated that such disasters can have devastating consequences.

The earthquakes of 6 February have once again demonstrated the extent to which the threat of earthquakes can have devastating consequences not only for people but also for companies and institutions. Scientists have shared their forecasts that earthquakes of a similar nature may occur in the coming years in various regions of our country, particularly in the Marmara Region.

Earthquake threats, which, should they occur, could adversely affect the Parent Company Bank's employees, customers, service facilities, infrastructure and superstructure assets, as well as its suppliers and service providers, leading to service disruptions and financial costs, are considered among the Parent Company Bank's most significant risks. In particular, it is anticipated that the effects of an earthquake occurring in the Marmara Region—where economic and commercial activities are concentrated both nationwide and specifically at DenizBank—could be significantly greater.

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Impact of the Risk on Cash Flow, Access to Finance and Cost of Capital

The impact of earthquake risk on the Parent Company Bank's financials is expected to materialise through physical damage to service facilities and infrastructure assets; a decline in fee and commission income resulting from operational disruptions; incident response and recovery costs associated with business continuity and disaster recovery activities; and a deterioration in the loan repayment performance of customers located in earthquake-affected regions. Within this framework, the impact of the risk is reflected in cash flows through items such as operating expenses, loan loss provisions, erosion of collateral value and revenue losses.

When assessed in terms of geographical concentration, the fact that a significant portion of the Parent Company Bank's loan portfolio and branch network is located in the Marmara Region, where economic activity is concentrated, is considered a material exposure factor in terms of earthquake risk. A large-scale earthquake in this region is expected to have simultaneous effects on both the Parent Company Bank's own operations and the economic activities of its customers operating in the region.

When assessed by time horizon, in the short term, revenue losses resulting from operational disruptions following an earthquake, along with repair and refurbishment costs for physical damage to service buildings and crisis management expenditure, are expected to put pressure on cash flows. In the medium term, a deterioration in the loan repayment performance of customers in the affected regions, an increase in provisioning expenses and an erosion of collateral values are anticipated. In the long term, the cumulative impact of natural disasters—whose frequency and severity are increasing due to climate change—along with the contraction in regional economic activity, is expected to have lasting effects on portfolio quality and strategic growth plans.

As a result of the comprehensive assessment carried out, the earthquake risk has been evaluated under the current scenarios in terms of the financial materiality threshold set at 5% of the Parent Company Bank's Profit Before Tax; furthermore, this risk has also been examined in terms of qualitative assessment criteria beyond financial materiality. Taking into account factors such as geographical concentration, operational continuity, employee and customer safety, dependence on critical infrastructure, long-term portfolio quality and stakeholder expectations, it is assessed that this risk ranks among the most significant risks for the Parent Company Bank.

The quantitative financial impact assessment of earthquake risk is characterised by high uncertainty regarding the probability distribution of earthquake scenarios, the wide variation in damage projections across different combinations of magnitude and epicentre, methodological constraints in modelling the interrelated impacts on service buildings, infrastructure assets, the customer loan portfolio and collateral values, and the limited availability of third-party damage projection data; consequently, it is not yet sufficiently mature to allow for a quantitative impact assessment during the current reporting period. Within this framework, the assessment of financial materiality is being conducted using qualitative approaches; the assessment considers: geographical concentration (the branch network, loan portfolio and concentration of operational assets in the Marmara Region), operational continuity and reliance on critical infrastructure, employee and customer safety, long-term portfolio quality, the potential for erosion of collateral value, the regulatory framework (DASK, business continuity obligations) and stakeholder expectations have been taken as key criteria. As a result of this comprehensive qualitative assessment, earthquake risk is identified as a risk area of high strategic importance to the Parent Company Bank, irrespective of the financial materiality threshold. It is planned to include quantitative financial impact analyses in future periods, alongside the development of the methodological framework and the expansion of collaborations with external data providers.

Strategy

Sustainability Risks and Opportunities

Sustainability Risks

Earthquake Risk

Actions Taken by DenizBank and the Impact of the Risk on Strategy and Decision-Making Processes

DenizBank regularly takes measures, plans and implements actions to mitigate the potential impacts of disasters, particularly earthquakes, and to manage such events more effectively. An effective governance model has been established within the Parent Company Bank to manage business disruption and disaster risks, with roles and responsibilities defined to cover all employees, starting with the Board of Directors. Organisational structures encompassing committees and business units at various levels have been established to ensure effective operation.

Policies, plans and procedures have been drawn up to ensure the effective functioning of the governance structure. Within this framework, relevant sub-plans, procedures and instructions have been implemented, primarily based on the Business Continuity Management Policy and Plan, the Crisis Management Plan, the Emergency Action Plan, the Business Recovery Plans, the IT Continuity Plan and the Procedure for Actions to be Taken by Employee in the Event of Natural Disasters.

A programme of tests and drills is being developed and implemented to maintain competencies and refine plans, thereby ensuring the more effective operation of management tools. Action plans, prepared on the basis of the "Lessons Learnt" from tests and drills—including those relating to Crisis Management—are being put into practice. As part of business continuity, regular training is provided to employee in line with their responsibilities; physical awareness activities, such as the distribution of emergency kits to all employees, are being carried out alongside online awareness initiatives. Significant projects have been implemented to enhance the capabilities and capacity of the Disaster Recovery Centre. Structures have been established to ensure the geographical redundancy of critical employee .

Earthquake risk is addressed in an integrated manner within the Parent Company Bank's strategy and decision-making processes under the headings of business continuity management, operational resilience, critical infrastructure management, service building planning, supplier and service provider management, and human resources security. Accordingly, earthquake safety criteria are taken into account in the processes relating to the selection and use of service premises; the Parent Company Bank's service continuity is safeguarded by structuring critical operations in line with the principle of geographical redundancy.

As part of the trade-off assessment, the balance between the commercial advantage of locating the branch network and operational capacity in the Marmara Region—where economic activity is concentrated—and the earthquake exposure resulting from this concentration is managed through the business continuity management framework and geographical redundancy structures. This approach aims to strengthen operational resilience without compromising commercial priorities.

Strategy

Climate Risks and Opportunities

Climate Risks

Climate-Related Drought/Water Stress

Risk Information

Type of Risk
Climate Risk – Chronic Physical

Description of the Risk
Value Chain Affected

Risk Horizon
Short, Medium, Long

Value Chain Affected
Downward

Expected Financial Impact
Increase in delays and defaults on loan repayments, rise in loan loss provisions, deterioration in portfolio quality

Scenario Analyses Used
SSP

Resilience
The integration of water stress criteria into the Parent Company Bank's loan approval process assesses the portfolio's resilience to water stress against the 2030 and 2050 time horizons through WRI Aqueduct-based geographical monitoring, blue finance products and climate scenario analyses.

Definition of the Risk

Increasing climate-related drought and water stress due to climate change can have significant impacts on the production processes and financial structures of customers operating in water-dependent sectors in particular. Changes in rainfall patterns, rising temperatures and the depletion of water resources may lead to production losses and increased costs in the agriculture, energy and industrial sectors. Taking regional differences into account, it is expected that the effects will become more pronounced for customers operating in regions with high water stress, and that this situation will place pressure on economic activities.

Impact of the Risk on Cash Flow, Access to Finance and Cost of Capital

For the agriculture, livestock, food, beverages, metals, manufacturing, textiles and electronics sectors—which form part of the client's portfolio and are assessed as being more vulnerable to water stress—the potential revenue loss impacts caused by water stress were analysed using 2025 turnover data and the WRI Aqueduct dataset, under various scenarios (low, medium and high scenarios) were analysed to assess the potential revenue loss impacts resulting from water stress. As part of the study, relevant clients were included in the assessment by matching them with their NACE codes and geographical location data. The analysis revealed that the financial impacts calculated across all scenario ranges remained below the financial materiality threshold, defined as 5% of the Parent Company Bank's Profit Before Tax.

These analyses were conducted taking into account the impact on the Parent Company Bank of production losses and cost increases caused by water stress, as reflected through customers' cash flows. Within this framework, the impact of the risk on the Parent Company Bank's financials is expected to be reflected indirectly, primarily through items such as loan repayment performance, interest income and loan provisions.

When assessed by time horizon, in the short term, an increase in operational costs and limited pressure on cash flow are anticipated for customers in water-intensive sectors due to regional drought and low rainfall patterns. In the medium term, should water stress become persistent, a deterioration in loan repayment performance and an increase in provisioning expenses are expected among customers in affected sectors. In the long term, particularly for customers operating in Türkiye's high-water-stress regions, a need to restructure production capacity is anticipated, alongside sectoral contraction and a deterioration in portfolio quality. Rising cost pressures and sectoral contraction are considered among the factors that could lead to an increase in credit risk, rising default rates and a deterioration in portfolio quality. Furthermore, the need for water efficiency investments and a shift towards alternative sources is creating additional financing demand among customers; from the Parent Company Bank's perspective, this demand is also linked to blue finance opportunities.

As a result of the comprehensive assessment carried out, it has been determined that, within the framework of the scenarios and assumptions applied during the current reporting period, the risk in question remains below the financial materiality threshold set at 5% of the Parent Company Bank's Profit Before Tax. However, the water stress risk has also been examined in terms of qualitative assessment criteria beyond financial materiality; when factors such as geographical concentration, long-term chronic nature, the share of water-intensive sectors within the portfolio, developments in the regulatory framework and stakeholder expectations are taken into account, it is assessed as a significant risk for the Parent Company Bank and is classified as a priority area for monitoring and management.

Actions Taken by DenizBank and the Impact of the Risk on Strategy and Decision-Making Processes

Water stress risk is taken into account within the Parent Company Bank's credit risk management, customer assessment processes, sustainable finance approach and operational resource efficiency practices. In this regard, the collection of information and documents required from customers in accordance with relevant procedures during credit processes enables these to be incorporated into the assessment of risks linked to water stress and resource efficiency. The Parent Company Bank treats water and energy efficiency measures as a key element both in its own operational processes and in assessing the environmental impacts of its customers' activities; within this framework, it assesses water stress risk in decision-making processes not merely as an environmental issue, but as a risk area linked to the quality of its loan portfolio and its sustainability-focused business model.

The Parent Company Bank's response to this risk is structured around the development of financing products that support clients' investments in water efficiency and sustainable water management, alongside the wider implementation of water-saving and resource-efficient practices within the Parent Company Bank's own operations. This approach aims to support, through financing, the transformation needs of customers who may be exposed to water-stress-related risks, whilst also making the Parent Company Bank's own use of resources more efficient. Furthermore, plans are in place to analyse the potential financial impacts of climate-related developments, including water stress, through climate scenario analysis and stress testing; the aim is to monitor and manage the effects of risk on the loan portfolio, operational processes and strategic decisions in a more systematic manner.

As part of the trade-off assessment, the balance between credit growth in water-intensive sectors and sustainable resource management is managed within the framework of credit allocation criteria and sustainable finance policies. Whilst the impacts relating to water use are taken into account in both operational processes and credit assessment practices, there is no separate investment, divestment or quantified resource allocation plan specific to the risk of drought or water stress. However, the financing solutions to be developed under the blue finance initiative serve as an indirect transformation mechanism addressing this risk area.

Strategy

Climate Risks and Opportunities

Climate Risks

Carbon Pricing Mechanisms

Risk Information

Type of Risk
Climate Risk – Transition

Description of the Risk
With the introduction of carbon pricing mechanisms, customers operating in carbon-intensive sectors may face rising costs, which could adversely affect their ability to repay loans.

Risk Horizon
Short, Medium, Long

Value Chain Affected
Direct Operations

Expected Financial Impact
Increase in credit risk, rise in default rates, decline in portfolio value in carbon-intensive sectors

Scenario Analyses Used
IEA

Resilience
The Parent Company Bank assesses the resilience of its portfolio against this risk across the short, medium and long term through sectoral selectivity policies in carbon-intensive sectors, the integration of ESG criteria into credit allocation processes, transition finance products and work on its Decarbonisation Strategy.

Definition of the Risk

The introduction and expansion of carbon pricing mechanisms (the EU ETS, CBAM and national emissions trading schemes) are having a direct impact on the cost structures of customers operating in carbon-intensive sectors. Rising carbon costs may weaken competitiveness, particularly in export-oriented sectors, whilst accelerating the need for transformation in production processes. In this context, investments aimed at reducing emissions, along with measurement and reporting obligations and compliance processes, may impose additional financial and operational burdens on customers.

Impact of the Risk on Cash Flow, Access to Finance and Cost of Capital

The impacts of carbon pricing have been analysed for customers in the aluminium, cement, fertiliser, iron and steel, and electricity sectors—which form part of the client portfolio and are assessed under the CBAM framework. As part of the study, the relevant customers were matched against NACE codes, sector and product breakdowns. Potential cost impacts across low, medium and high-scenario ranges were calculated, taking into account carbon pricing scenarios and the free allocation mechanism under the EU ETS.

These analyses were assessed by considering the impact on the Parent Company Bank of any cost increases arising from the CBAM on customers' profitability and cash flows. The impact on the Parent Company Bank is expected to arise primarily through updates to macroeconomic parameters used in expected credit loss (ECL) calculations for the loan portfolio in sectors covered by the CBAM, an increase in provisioning expenses, a rise in default rates, a contraction in interest income, and erosion in the value of loan collateral in carbon-intensive sectors.

When assessed by time horizon, in the short term, the cost impact of reporting obligations during the CBAM transition period and expenditure on compliance with customer carbon data collection processes; in the medium term, a significant increase in the cost structures of customers in carbon-intensive sectors and a deterioration in credit quality, alongside the phased removal of free allowances; whilst in the long term, the expansion of the EU ETS scope and the introduction of a national ETS are projected to result in a permanent erosion of portfolio value in carbon-intensive sectors and a need for strategic rebalancing.

As a result of the analyses conducted, it has been determined that the financial impact of the mentioned risk, calculated within the framework of the carbon price scenarios and free allocation assumptions applied during the current reporting period, remains below the financial materiality threshold set at 5% of the Parent Company Bank's Profit Before Tax. However, carbon pricing risk has also been examined in terms of qualitative assessment criteria beyond financial materiality; taking into account factors such as the share of carbon-intensive sectors within the portfolio, accelerating developments in the regulatory framework (the final implementation of the CBAM, the EU ETS reform, national ETS initiatives), differences in clients' transition capacity, and the need for long-term portfolio transition, it is assessed as a significant transition risk for the Parent Company Bank and is classified as a priority area for monitoring and management.

Actions Taken by DenizBank and the Impact of the Risk on Strategy and Decision-Making Processes

DenizBank offers a range of loan products with favourable interest rates to support the transition to a green economy. It facilitates access to finance for businesses investing in line with environmental sustainability targets. The Parent Company Bank prioritises projects that will accelerate the transition to a low-carbon economy and focuses on projects that reduce carbon emissions, increase energy efficiency and promote the use of renewable resources, in line with its Sustainable Finance Framework.

Under the Climate Action heading within its sustainability strategy, work is ongoing to develop a Parent Company Bank-wide Decarbonisation Strategy aimed at the effective management of risks and opportunities arising from climate change. It is planned that this strategy will be designed to align with the reduction targets adopted by the majority shareholder across the Group and supported by complementary roadmaps.

In this regard, adaptive changes to the business model are expected through increased selectivity in carbon-intensive sectors, the strengthening of sector policies and the risk appetite framework, the integration of carbon risk assessment criteria into credit allocation processes, and the scaling up of transition finance solutions that support the low-carbon transition. Whilst there is no separate investment or divestment plan specific to carbon pricing mechanisms, the products to be developed within the framework of transition finance opportunities will serve as a transformation mechanism addressing this risk.

As part of the trade-off assessment, the balance between the short-term revenue contribution from the current volume of loans in carbon-intensive sectors and the portfolio's resilience to carbon pricing risks in the medium to long term is managed within the framework of sectoral selectivity policies and the risk appetite framework.

Strategy

Climate Risks and Opportunities

Climate Opportunity

Blue Finance

Opportunity Information

Type of Opportunity
Climate Opportunity

Description of the Opportunity
To develop the Parent Company Bank's products and services within the scope of blue finance and diversify its portfolio in line with the growing need for funding for projects aimed at the efficient use and protection of water resources.

Time Horizon of the Opportunity
Medium & Long

Value Chain Affected
Downstream

Expected Financial Impact
Increase in lending volume, acquisition of new customers, rise in sustainable finance revenues

Resilience
The development of the blue finance sector is strengthening the resilience of the Parent Company Bank's loan portfolio in sectors exposed to water stress risks and enhancing customers' capacity to adapt.

Opportunity Description

Providing finance for projects aimed at the conservation and efficient use of water resources and the sustainability of water-dependent ecosystems under "Blue Finance" represents a new area of growth for the Parent Company Bank. Growing demand for investments in water efficiency, wastewater management and the protection of marine ecosystems enables the Parent Company Bank to diversify its sustainable finance product portfolio and reach new customer segments. The financing solutions to be developed in this context can support the Parent Company Bank in gaining a competitive advantage by strengthening its position in the field of environmental sustainability.

Impact of the Opportunity on Cash Flow, Access to Finance, and Cost of Capital

Blue finance is regarded as an area that helps the Parent Company Bank generate new lending volumes and diversify its portfolio of sustainable finance products by providing funding for projects focused on water efficiency, wastewater management, the conservation of water resources and the sustainability of water-dependent ecosystems. In this context, the growing demand for investments in water management and the conservation of marine ecosystems is supporting the Parent Company Bank's access to new customer segments and making a positive contribution to cash flows through interest and commission income.

When assessed by time horizon: in the short term, revenue contributions are expected from product development and the roll-out of pilot projects; in the medium term, from an increase in the volume of loans for water efficiency projects; and in the long term, strategic positioning within the blue finance sector and the acquisition of new customers are anticipated as the effects of climate change on water resources become more pronounced.

In terms of access to finance and the cost of capital, the development of products and services in the blue finance sector enhances the Parent Company Bank's visibility and competitive advantage in sustainable finance markets. The financing of projects focused on water efficiency and sustainable water management supports the Parent Company Bank in adopting a financing approach aligned with national and international best practices, thereby strengthening its access to sustainability-themed funding sources.

Assessments of the financial impact of this opportunity give rise to uncertainty in the current reporting period due to high uncertainty in scenario assumptions, methodological constraints regarding long-term projections, and limitations arising from data availability. The assessment of financial materiality is being conducted using qualitative approaches. It is planned to include quantitative financial impact disclosures in subsequent periods as the methodological framework is developed.

Actions Taken by DenizBank and the Impact of the Risk on Strategy and Decision-Making Processes

To evaluate opportunities within the scope of blue finance, the Parent Company Bank is developing financing options for projects focused on water efficiency and water management, and is expanding its sustainable finance framework accordingly. Water-related risks and opportunities are being integrated into credit assessment and product development processes; national and international best practices are closely monitored and incorporated into strategic planning. This approach supports the Parent Company Bank in developing new products in the field of sustainable finance and proactively assessing market opportunities.

Examples of funding allocated to blue finance projects, in line with the approach to protecting water resources and supporting water-related ecosystems, can be found at. Within this framework, whilst it is possible to assess water-focused financing areas within the sustainable finance portfolio, there is no separate, quantified growth or resource allocation plan specific to blue finance.

Strategy

Climate Risks and Opportunities

Climate Opportunity

Transition Financing

Opportunity Information

Type of Opportunity
Climate Opportunity

Description of the Opportunity
In line with the growing demand from customers in carbon-intensive sectors for financing their transition to a low-carbon economy, the Parent Company Bank should develop its products and services within the scope of transition finance and balance its portfolio from a sustainability perspective

Time Horizon of the Opportunity
Medium & Long

Value Chain Affected
Downstream

Expected Financial Impact
Whilst transition financing drives revenue growth through new lending volumes and the strengthening of customer relationships, it also contributes to the improvement of the credit risk profile in the long term.

Resilience
Transition finance products are enhancing the resilience of the Parent Company Bank's portfolio in carbon-intensive sectors against transition risks and strengthening its strategic position in the process of adapting to a low-carbon economy.

Opportunity Description

Transition finance solutions, developed to support the transition of companies operating in carbon-intensive sectors towards a low-carbon economy, present a significant growth and transformation opportunity for banks. In line with regulations, national contribution pledges and international sustainability targets, the financing of investments aimed at reducing emissions by customers operating in sectors such as energy, industry and transport is coming to the fore. In this context, the development of transition finance products and their integration into the existing loan portfolio can help banks expand their customer base and create long-term value by enhancing their sustainable finance capacity.

Impact of the Opportunity on Cash Flow, Access to Finance, and Cost of Capital

Transition finance is seen as an opportunity enabling the Parent Company Bank to generate new lending volumes, increase interest and commission income, and deepen its long-term relationships with customers by financing the transition processes of its clients in carbon-intensive sectors towards a low-carbon economy. The shift by customers operating in sectors with a high need for emissions reduction – such as energy, industry and transport – towards investments in energy efficiency, renewable energy, process optimisation and emissions reduction is supporting the generation of new financing requests for the Parent Company Bank. The development of transition finance products and their integration into the existing loan portfolio is enhancing the Parent Company Bank's sustainable finance capacity, contributing to the expansion of its customer base, the rebalancing of its loan portfolio from a sustainability perspective, and the creation of long-term value.

When assessed by time horizon, the introduction of sustainability-linked loan (SLL) products is expected to lead to an increase in commission income in the short term; growth in the volume of loans to customers falling within the scope of the transition taxonomy in the medium term; and, in the long term, a reduction in the portfolio's carbon intensity, increased resilience to transition risks and an improvement in the cost of capital.

From the perspective of access to finance and the cost of capital, strengthening transition finance activities helps the Parent Company Bank to establish a portfolio structure aligned with its sustainable growth strategies and to reinforce its position in the field of sustainable finance. Supporting the transformation processes of clients in carbon-intensive sectors through financing helps to enhance these clients' capacity to adapt to transition risks, thereby contributing to the reduction of credit risks in the long term and the preservation of portfolio quality.

Assessments of the financial impact of this opportunity are subject to uncertainty in the current reporting period due to high uncertainty in scenario assumptions, methodological constraints regarding long-term projections, and limitations arising from data availability. The assessment of financial materiality is being conducted using qualitative approaches. It is planned to include quantitative financial impact disclosures in future periods as the methodological framework is developed.

Actions Taken by DenizBank and the Impact of the Risk on Strategy and Decision-Making Processes

Transition finance is one of the priority financing areas developed within the Parent Company Bank's business model to support the transition of high-emission sectors towards a low-carbon economy. In this context, the Parent Company Bank aims to channel resource allocation towards the adaptation processes of carbon-intensive sectors by assessing clients' transition plans, analysing sectoral transition roadmaps, and developing sustainability-linked loans (SLLs), green loans and thematic financing instruments.

As part of concrete action plans, the development of a transition plan assessment methodology for clients in carbon-intensive sectors, expanding the SLL product range and strengthening the KPI determination methodology, aligning sectoral decarbonisation roadmaps with the Decarbonisation Strategy, expanding partnerships with international financial institutions on transition finance, and institutionalising transition advisory services within customer relationship processes are identified as priority areas for action.

Within the scope of the offset assessment, the balance between the short-term revenue contribution from the current volume of loans in carbon-intensive sectors and the decarbonisation of the portfolio in the medium to long term is managed within the framework of sectoral selectivity policies and clients' actual transformation capacity (greenwashing risk management).

Strategy

Climate Risks and Opportunities

Sustainability Opportunity

Market Opportunity – Expansion of the Green Loan Portfolio

Opportunity Information

Type of Opportunity
Sustainability Opportunity

Description of the Opportunity
In line with the growing demand for green loan products, the Parent Company Bank aims to expand its loan portfolio in accordance with environmental sustainability criteria and to increase its sustainable finance activities.

Time Horizon of the Opportunity
Short, Medium, Long

Value Chain Affected
Downstream

Expected Financial Impact
Increase in revenue

Resilience
The expansion of the green loan portfolio will enhance the Parent Company Bank's portfolio resilience against transition risks and strengthen its strategic position during the transition to a low-carbon economy.

Opportunity Description

Global demand for sustainable transformation is growing, and DenizBank is positioning its financing and advisory services in the areas of renewable energy, energy efficiency, sustainable agriculture and low-carbon infrastructure as a strategic growth area. Sustainability-themed credit facilities provided by International Financial Institutions offer long-term financing opportunities aimed at supporting project-based investments in priority areas such as combating climate change, low-carbon transition, sustainable infrastructure and social development. By channelling these resources towards projects aligned with development and sustainability objectives, they support the Parent Company Bank in expanding its sustainable finance portfolio, creating new business opportunities and achieving growth in line with its strategic priorities.

Impact of the Opportunity on Cash Flow, Access to Finance, and Cost of Capital

This opportunity is regarded as one that directly contributes to the Parent Company Bank's ability to diversify its revenue base and generate a positive impact on cash flows by increasing its lending volume in priority areas such as sustainable agriculture, energy transition, disaster resilience, infrastructure and inclusive finance. The introduction of new green loan products and the scaling up of green, social and thematic finance programmes are aimed at increasing the Parent Company Bank's interest, commission and intermediation income. In particular, the rising demand for financing sustainable projects in capital-intensive sectors such as energy, infrastructure and agriculture will help the Parent Company Bank establish a long-term and more resilient revenue structure through projects that generate environmental and social benefits, thereby supporting its loan growth.

When assessed in terms of access to finance and the cost of capital, strengthening the green loan portfolio facilitates the Parent Company Bank's access to sustainability-themed, long-term and relatively low-cost funding sources provided by international financial institutions. Channelling these funds into sustainable projects not only enhances the Parent Company Bank's sustainable financing capacity but also strengthens the portfolio's resilience to climate and transition risks. The relatively low-risk nature of sustainable projects improves the credit portfolio's risk profile and supports the preservation of asset quality in the long term.

When assessed by time horizon, an increase in commission and intermediation income is anticipated in the short term through the launch of new green products; growth in net interest income is projected in the medium term through the expansion of the green and sustainability-linked loan portfolio; and in the long term, access to new business models and an improvement in the cost of capital are expected alongside the transition to a low-carbon economy.

Assessments of the financial impact of this opportunity are subject to limitations regarding the quantification of impact during the current reporting period, due to high uncertainty in scenario assumptions, methodological constraints relating to long-term projections, and limitations arising from data availability. Consequently, the assessment of financial materiality is being conducted using qualitative approaches during the current reporting period; however, it is planned to include quantitative financial impact disclosures in subsequent periods as the methodological framework is developed.

Actions Taken by DenizBank and the Impact of the Risk on Strategy and Decision-Making Processes

The Parent Company Bank has identified the systematic expansion of financing provided to sectors and areas of activity that support the green transition, within the framework of sustainable finance, as a strategic priority. In line with this, resource allocation is being directed towards the areas of energy and resource efficiency, renewable energy and low-carbon production. The range of sustainable finance products and the funding portfolio are being expanded.

In this context, the Parent Company Bank is expanding its product range to include green loan products, sustainability-linked loans, agricultural sustainability products and green transition financing for the SME segment; it is also continuing its sustainability-themed funding processes within the framework of partnerships with international financial institutions (such as the IFC, EIB, EBRD and AFD). Furthermore, the integration of ESG assessment criteria into credit allocation processes and the structuring of sustainable finance reporting in a manner consistent with ICMA, LMA and the EU Taxonomy are among the Parent Company Bank's priority areas of action.

Within the scope of the trade-off assessment, the balance between the short-term pressure on yield margins resulting from sustainable finance growth and the portfolio's resilience to transition risks in the medium to long term, alongside its positive impact on the cost of capital, is managed within the framework of the credit growth strategy.

Strategy

Climate Risks and Opportunities

Sustainability Opportunity

Financing Opportunity – Access to Sustainable Finance

Opportunity Information

Type of Opportunity
Sustainability Opportunity

Description of the Opportunity
With the growing demand from international investors for net-zero aligned portfolios and the introduction of regulations such as the CBAM, ETS and the EU Green Bond Standard, the Parent Company Bank aims to diversify its range of green, social and sustainability-linked capital market instruments in order to broaden its access to funding sources and reduce its overall financing costs

Time Horizon of the Opportunity
Short, Medium, Long

Value Chain Affected
Upstream

Expected Financial Impact
An increase in the diversity of funding sources and a reduction in the total cost of financing

Resilience
The diversification of the funding base and access to a sustainable investor base are strengthening the Parent Company Bank's financial resilience against market shocks and climate transition risks.

Opportunity Description

International investors and asset managers are rapidly aligning their portfolios with net-zero targets and new regulations such as the EU Carbon Border Adjustment Mechanism, the expanding EU Emissions Trading System (ETS), the EU Green Bond Standard, and the Omnibus amendments to the SFDR/MiFID II; and this pressure is intensifying as exemptions granted to carbon-intensive sectors are gradually phased out. The issuance of green, social or sustainability-linked bonds and loans in line with the ICMA Principles and the EU Taxonomy could enhance the Parent Company Bank's access to this growing pool of transition-focused capital, reduce its funding costs and strengthen its resilience to transition risks.

Impact of the Opportunity on Cash Flow, Access to Finance, and Cost of Capital

The Parent Company Bank's green and social bonds, sustainability-linked and green loans, green securitisations, ESG-linked derivatives, thematic equity issuances, sustainability-labelled covered bonds and green or ESG-linked deposit products. Capitalising on investor demand for impact-focused assets supports the Parent Company Bank in securing funds on more favourable terms and creates a cost-reducing effect (the greenium advantage) on overall financing costs. Strong global investor demand for sustainable finance instruments enables the Parent Company Bank to secure funding at a lower cost compared to conventional instruments with similar maturities.

From a cash flow perspective, the issuance and structuring of sustainable finance instruments enhance the Parent Company Bank's access to long-term and thematic sources of funding, thereby contributing to a more balanced and diversified funding structure. This situation creates new revenue streams by supporting the financing of sustainable loans and investment products, and makes a positive contribution to the Parent Company Bank's cash flows through interest, commission and brokerage income. At the same time, the capital channelled into sustainable projects strengthens the Parent Company Bank's reputation and supports its standing with investors, thereby contributing to an improvement in the cost of capital in the medium and long term, easier access to funding sources, and increased financial resilience in line with its sustainable growth strategy.

When assessed by time horizon: in the short term, the diversification of the funding base through the issuance of green/social bonds and sustainability-linked loans is expected; in the medium term, a reduction in the total cost of funding is anticipated through the greenium advantage; and in the long term, the strategic cost-of-funding advantage is expected to become permanent through sustained access to a net-zero aligned investor pool.

Actions Taken by DenizBank and the Impact of the Risk on Strategy and Decision-Making Processes

Green and social bonds, sustainability-linked and green loans, green securitisations, ESG-linked derivatives, thematic share issues, sustainability-labelled covered bonds and even green or ESG-linked deposit products can help reduce the Parent Company Bank's overall funding costs by capitalising on strong investor demand for impact-focused assets. Channelling this capital into suitable sustainable projects simultaneously strengthens the Parent Company Bank's reputation and attracts a broader, purpose-driven investor base.

Access to sustainable finance is viewed not merely as a product-based opportunity, but also as a strategic area of resource allocation that serves to transform the funding structure. In this context, the diversification of sustainable finance instruments, the continuation of partnerships with international financial institutions, and the expansion of the sustainability-themed funding portfolio at are among the key components of the Parent Company Bank's business model development.

Strategy

Climate Resilience and Scenario Analysis

Scenario analyses are conducted within the framework of a holistic approach that jointly assesses exposure to transition and physical risks that may arise from climate change. The selected scenarios were chosen because they enable a comparative assessment of the nature, magnitude and financial impacts of the risks to which DenizBank may be exposed under different climate development pathways. A key factor in selecting these scenarios was their ability to enable a comparative assessment of the Group's resilience to climate-related changes, regulatory developments and increasing uncertainties under different temperature rise trajectories, policy responses and levels of physical risk severity. The analyses have been designed to take into account the impacts on the Group's loan portfolio, the activities it finances, its relevant business lines and its own operational activities.

In the analyses carried out within this framework, Representative Concentration Pathways (RCPs) developed by the Intergovernmental Panel on Climate Change (IPCC), alongside the International Energy Agency (IEA) Net Zero Emissions (NZE), the Network for Greening the Financial System (NGFS) and Shared Socio-economic Pathways (SSP) scenarios, all of which are consistent with the Paris Agreement, are used as references. Within this framework, the analyses also take into account the climate policies, regulatory trends, carbon reduction frameworks and policy instruments applicable in the regions where the Parent Company Bank operates, which may influence the transition process.

The analyses consider short-, medium- and long-term time horizons in order to assess the time-varying impacts of climate risks. These time horizons are utilised in such a way as to enable the separate monitoring of near-term impacts, the dynamics of structural transformation and physical risks that accumulate over the long term.

In the work carried out during the 2025 reporting period, different sets of scenarios were utilised to represent various future projections related to sustainability and climate:

Sets of Scenarios Used in Physical and Transition Risk Analyses

- **RCP 2.6 / RCP 8.5**
- **NGFS Below 2°C / NGFS Current Policies**
- **IEA Net Zero Emissions (NZE) / IEA Announced Pledges Scenario (APS)**
- **SSP1-2.6 / SSP5 Baseline**

The first set of scenarios used in the analyses represents a scenario in which global warming remains relatively limited and the transition to a low-carbon economy takes place earlier, in a planned and orderly manner. Within this framework, whilst transition risks are expected to be higher in the short and medium term due to more pronounced policy and regulatory pressures, it is projected that physical risks will remain relatively limited in the long term. Within this scenario set, particular attention is paid to factors such as carbon pricing mechanisms, regulatory tightening, the pace of energy transition and the capacity to adapt to low-carbon technologies. In addition, the analyses take into account trends that shape the macroeconomic outlook, such as growth, inflation, cost structures, financing conditions and the sectors' capacity for transformation. In the physical risk analyses, local variables specific to Türkiye, such as the distribution of water resources, regional climate conditions, water stress levels and the availability of natural resources, are included in the assessment.

The second set of scenarios represents a pathway in which climate policies remain more limited, the transition process is delayed or proceeds erratically, and, as a result, global temperature increases reach higher levels. In this scenario, whilst transition risks may be felt to a relatively lower extent in the short term, physical risks are expected to emerge more prominently and severely in the medium and long term. In this context, the impacts of factors such as increasing extreme weather events, chronic climate effects, water stress and pressures on natural resources on client activities and sectors are assessed at a higher level. In transition risk analyses, national and international climate policies, carbon pricing mechanisms, trends relating to the energy transition, macroeconomic developments and sector-specific technological transformation processes are taken into account. These assessments also analyse the impact on sectors of the regulatory framework of the markets in which the company operates, alongside transformations in energy supply, energy consumption, energy costs and energy distribution.

In this context, the analyses take into account national and international climate policies, carbon pricing mechanisms, trends relating to the energy transition, macroeconomic developments and sector-specific technological transformation processes. Furthermore, the analyses include the effects on sectors of changes in energy consumption patterns and the transition to low-carbon technologies. At the same time, the pace of development, feasibility and level of adoption of low-carbon technologies across sectors are assessed in terms of their impact on the costs, opportunities and adaptation capacity of the transition process.

As part of the financialisation studies, physical and transition risk scenarios were evaluated by linking them to relevant modelling approaches. In water stress analyses, potential revenue loss impacts were calculated using province-level risk scores based on WRI-derived scenario sets; whilst within the scope of transition risks, financial impacts for the 2026–2035 period were modelled in CBAM analyses by taking into account carbon price scenarios, free allocation mechanisms and sector-specific emission intensities.

In scenarios representing a more favourable climate outlook, it is assessed that transition risks may indicate higher stress levels in the short and medium term due to the regulatory framework tightening more rapidly and carbon prices reaching higher levels. In this context, the effects of these cost increases on production costs, profitability and cash flows at the customer level are taken into account. The implications of these effects on loan repayment performance, default risk and financial resilience, depending on customers' ability to pay, are incorporated into the analytical approach.

The scenario analyses carried out are based on work conducted during the 2025 reporting period, and the results of these scenario analyses are used as input in assessing the Bank's exposure to climate risks and the financial impacts of these risks. The assessments obtained throughout the reporting period during which the scenario analysis was carried out have been used to monitor the Bank's climate resilience, prioritise risks and support the relevant decision-making processes.

Strategy

Methodology for Financial Impact Assessments

Financial impact assessments, conducted to evaluate the financial implications of identified sustainability and climate-related risks and opportunities, are carried out in accordance with the TSRS framework, following a step-by-step methodology tailored to each specific risk and opportunity. This methodology is structured around seven key steps: scope and portfolio definition, data collection and matching, definition of scenarios and sets of assumptions, determination of time horizons, impact modelling and calculation, translation into the Parent Company Bank's financials, and materiality assessment. Within this framework;

- In the first stage, the customer portfolio falling within the scope of the relevant risk or opportunity is defined by sector and geographical location. Customers are matched using NACE codes, sector and product breakdowns.
- In the second stage, credit portfolio data, customer financial data, turnover and collateral information obtained from the Parent Company Bank's internal systems are incorporated into the analytical framework, alongside the WRI Aqueduct water stress dataset, IEA scenario data, IPCC climate projections and sectoral emission intensities obtained from third-party data providers.
- In the third and fourth stages, appropriate scenarios, assumptions and time horizons are determined for each risk and opportunity. Physical risk analyses are based on RCP and SSP scenarios, whilst transition risk analyses are based on the IEA's Net Zero Emissions, Stated Policies and Current Policies scenarios. Carbon price pathways, free allocation rates, sector-specific emission intensities and macroeconomic parameters are defined as a set of assumptions. The time horizons used are 2030 and 2050 for water stress analyses, and the period 2026–2035 for CBAM analyses.
- In the fifth stage, impact modelling is carried out across low, medium and high scenario ranges in line with the scenarios and assumptions identified. The impacts on potential revenue loss, cost increases and loan repayment performance at customer level are calculated.
- In the sixth stage, the impacts identified at customer level are aggregated to the Parent Company Bank's financials via the loan portfolio. The impact on the Parent Company Bank's cash flows is assessed through items such as expected credit losses, provisioning expenses, interest income, and fee and commission income.
- In the final stage, the calculated financial impacts are compared against a financial materiality threshold set at 5% of the Parent Company Bank's Profit Before Tax. Furthermore, the level of significance of the risk and opportunity is determined by taking into account qualitative assessment criteria such as strategic alignment, the degree of regulatory compliance, geographical concentration and stakeholder expectations.

Uncertainties and Assumptions

The scenario analyses carried out are based on policy developments and key assumptions in the areas of sustainability and climate. In this context, the key assumptions include: the development of carbon pricing mechanisms; the timing and severity of changes to the regulatory framework; the gradual reduction in free allowances; the pace of the energy transition; the capacity to transition to low-carbon technologies; the geographical distribution of climate-induced physical impacts; and developments in the cyber threat landscape.

In the analysis of cyber security risks within the context of sustainability risks, the likelihood of data breaches and operational disruption scenarios based on past occurrences have been taken as the basis.

Within the framework of scenario analysis conducted as part of the assessment of climate risks, transition risks and physical risks are assessed using separate sets of scenarios. In transition risk assessments, the IEA's Current Policies Scenario, Stated Policies Scenario and Net Zero Emissions scenarios are taken into account in order to analyse the policy-, market- and technology-driven impacts of the transition to a low-carbon economy. In this context, by considering both the development pathway under the continuation of current policies and pathways envisaging a steady and rapid transition together, a comprehensive assessment of transition risks under different policy and market conditions is ensured.

In physical risk assessments, datasets compatible with the IPCC and SSP/RCP frameworks are utilised, with high-warming scenarios, where chronic physical risks become more pronounced, serving as the reference point. Specifically regarding water stress, assessments are carried out for the years 2030 and 2050 under different scenarios using the WRI Aqueduct dataset. Furthermore, high-warming scenarios, in which chronic physical risks become more pronounced, are considered alongside regular transition scenarios relating to transition risks, thereby incorporating the interactions between physical and transition risks into the scope of the analysis. In the analyses, short-, medium- and long-term time horizons were taken into account in order to assess the effects of climate risks and the Parent Company Bank's resilience to these risks over time. These time horizons were determined in line with the Parent Company Bank's strategic planning cycle, the average maturity of its loan portfolio and the time horizon over which climate risks are expected to materialise.

Key areas of uncertainty identified in the scenario analyses included: the transformation and adaptation capacity of customers operating in carbon-intensive sectors; their ability to pass on cost increases to prices; regulatory developments in export markets; changes in regional water stress levels; the impact of physical climate effects on operational continuity; and the predictability of the frequency and impact of cyber threats associated with increasing digitalisation. The impact of these areas of uncertainty on the Parent Company Bank's resilience varies depending on the time horizon. In the short term, cyber threats and regulatory compliance costs stand out as key areas of uncertainty; in the medium term, carbon pricing and the Parent Company Bank's capacity to adapt to customer shifts; and in the long term, physical climate impacts and the pace of the energy transition.

The areas of uncertainty identified within DenizBank are taken into account as a key input in shaping the Parent Company Bank's decision-making processes and are systematically assessed within the framework of balancing financial risk and performance. Within this framework, policy-driven developments and long-term physical climate risks, in particular, are prioritised as key areas for analysis and monitoring.

In transition risk analyses, the effects of rising carbon prices and costs arising from regulatory obligations on customers' production costs, profitability and cash flows have been taken into account. The potential implications of these effects on credit repayment performance and default risk, depending on customers' ability to pay, have been included in the assessment. These effects are expected to become particularly evident in the medium and long term, and the resilience of the Parent Company Bank's loan portfolio is assessed on the basis of these time horizons.

In physical risk analyses, for customers operating in water-sensitive sectors, regional water stress levels, the likelihood of production losses and the need for operational adaptation have been taken into account. As the effects of chronic physical risks, particularly water stress, are expected to become more pronounced in the long term, the Parent Company Bank's resilience to these risks is assessed against the 2030 and 2050 time horizons.

In the opportunity analyses, consideration has been given to the growth in demand for sustainable finance products, the volume of financing provided for renewable energy and energy efficiency projects, and the growth potential of the green and sustainability-linked loan portfolio. In these assessments, the pace of growth in market demand, the continuity of regulatory incentives and the capacity of customer profiles to undergo a sustainability-focused transformation stand out as key elements of uncertainty. The potential contributions of these opportunities to the Parent Company Bank's revenue structure and portfolio composition are assessed on the basis of medium- and long-term time horizons.

As part of the Compliance Roadmap established to manage uncertainties effectively, changes in the regulatory framework, market dynamics and key climate-related risk indicators

Strategy

are continuously monitored; strategic decisions are reviewed and revised in line with these outcomes to ensure they remain aligned with current conditions. In this process, short-term actions focus on strengthening operational resilience; medium-term actions on aligning the portfolio structure with a low-carbon economy; and long-term actions on transformation measures consistent with the Parent Company Bank's net-zero targets and strategic direction.

In this process, the results of the scenarios used in the financial impact assessments also provide input for decision-making processes. Whilst water stress analyses take into account 2025 turnover figures and geographical distribution, CBAM analyses are based on carbon price scenarios and allocation assumptions, and cyber risk analyses are based on data breach and disruption scenarios.

DenizBank carried out a comprehensive climate resilience assessment during the 2025 reporting period to evaluate the resilience of its strategy and business model in the face of climate change. This assessment is as follows. It was designed to cover both upstream and downstream elements across the value chain, including the Parent Company Bank's loan portfolio, financed activities, its own operational processes, service facilities, employees, suppliers and funding structure. The assessment was carried out using a holistic approach that combined the findings of climate scenario analyses with financial impact studies, involving business units, risk management, sustainability and internal control functions; it was reviewed by committees at Board level and provided input into strategic decision-making processes. This assessment will be repeated annually in line with the existing sustainability governance framework and will be updated in light of regulatory developments, updates to scenario frameworks and new data sources.

The key assumptions used in the assessment cover the development trajectory of carbon pricing mechanisms, the timing and severity of changes to the regulatory framework, the gradual reduction in free allowances, the pace of the energy transition, the capacity to transition to low-carbon technologies, and the geographical distribution of climate-related physical impacts. These assumptions have been assessed in conjunction with key areas of uncertainty, such as the methodological constraints of the scenario frameworks regarding long-term projections, volatility in carbon price trajectories, the predictability of customer transition capacity, variability in regional water stress levels, the timing of the materialisation of physical climate impacts, and limitations related to data availability. These areas of uncertainty are explicitly taken into account in the Parent Company Bank's decision-making processes; the outputs of the scenario analyses are presented across low, medium and high scenario ranges, enabling an understanding of potential impacts under different future scenarios.

The Parent Company Bank's capacity to adapt its strategy and business model to climate change is assessed within the framework of action areas that differ across the short, medium and long term. In the short term, actions are being pursued to expand the range of sustainable finance products, integrate ESG and climate risk criteria into credit allocation processes, and strengthen data infrastructure through investments in business continuity and operational resilience. In the medium term, it is envisaged that sectoral selectivity policies in carbon-intensive sectors will be strengthened, transition finance products will be scaled up, and customer transition plans will be incorporated into assessment processes. In the long term, in line with the Decarbonisation Strategy currently being developed at Parent Company Bank level, the aim is to rebalance the portfolio in line with a low-carbon economy, transition to a net-zero aligned funding structure, and make a permanent shift to a climate-resilient business model. Within this framework, climate resilience is continuously monitored in terms of the Parent Company Bank's financial adequacy, capital structure, liquidity position and capacity to access funding sources; the current assessment indicates that the Parent Company Bank's strategy and business model are capable of maintaining resilience under various climate scenarios.

The scenario analyses and the related financial impact assessments reflect assessments pertaining to the 2025 reporting period.

Sustainability Strategy

DenizBank shapes its approach to sustainability in line with its vision of "A bank for all and beyond… Facilitating sustainability transformation with innovative finance" and integrates this approach at the heart of its strategy and decision-making processes. The Parent Company Bank assesses sustainability-related risks and opportunities in terms of their environmental and social impacts, as well as their effects on financial performance, the business model and long-term value creation. In this context, the link between these risks and opportunities and the Parent Company Bank's current business model and strategic priorities is established by taking into account their impact on the quality of the loan portfolio, collection performance, revenue-generating capacity, access to funding sources, cost of capital and the development of sustainable finance products.

Sustainability and climate-related risks and opportunities affect not only the Parent Company Bank's short-term financial performance but also the resilience of its business model and its capacity for long-term value creation. For example, the effects of physical and transition risks arising from climate change on lending customers can influence the risk profile of the loan portfolio, collection performance and expected credit losses; this may have indirect consequences for the Parent Company Bank's profitability and capital adequacy. Conversely, growing demand for sustainable finance, transition finance and green finance products can contribute to the creation of new revenue streams, the strengthening of customer relationships and support for access to funding sources.

In this regard, DenizBank assesses sustainability-related risks and opportunities not merely within the scope of compliance obligations, but as strategic elements that influence the long-term resilience of its business model, its competitive strength and the value created for stakeholders. Consequently, the sustainability approach is integrated into strategic decision-making processes with the aim of safeguarding financial performance, developing new areas of growth and supporting long-term value creation.

In line with this, DenizBank structures its operations around three core value areas: Sustainable Finance, Future Talent and Next-Generation Banking. It defines its strategic priorities through these areas. This framework ensures that sustainability-related risks and opportunities are systematically integrated into business processes and taken into account in decision-making mechanisms.

DenizBank plans to provide the necessary resources to implement the actions identified within the scope of its sustainability strategy, decarbonisation efforts and the TSRS compliance roadmap through existing operational budgets, investments in technology and data infrastructure, and the human resources planning of the relevant business units. Resource requirements are assessed as part of the annual budget and strategic planning processes, and prioritised projects are implemented in accordance with the approval of the relevant management bodies.

In this context, the Parent Company Bank has the capacity to transform its existing assets and systems with the aim of developing its current digital infrastructure, improving data collection and reporting systems, strengthening its climate risk analysis capabilities, and supporting sustainable finance activities. A significant portion of the work relating to sustainability and climate change is carried out through the development of existing operational processes and technological infrastructure.

It is expected that the investments planned under the decarbonisation strategy and adaptation roadmap will contribute to strategic objectives by enabling more effective monitoring of GHG emissions, more accurate measurement of climate risks, increased capacity for sustainable finance, an improved proportion of green assets, and the strengthening of the Parent Company Bank's long-term climate resilience.

Strategy

Vision

To be a facilitator in the sustainability transition through innovative financing

Core Values

Next-Generation Banking

Customer Journey and Experience

Digitalisation and Innovation

Ecosystem Banking

Sustainable Finance

Environmental Impact Financing

Responsible Services and Products

Access to Financial Services

Future Talent

Talent Attraction and Retention

Diversity and Inclusion

Employee Experience

Corporate Foundations

Data Privacy and Security - Governance, Compliance and Ethics - Systematic Risk Management

Core Objective

Transition to a Low-Carbon Economy

Climate Action

The Parent Company Bank assesses the impact of sustainability-related risks and opportunities on its strategy, particularly in the context of credit allocation processes, product development activities, investment decisions and customer relationship management. Cybersecurity linked to sustainability; climate-related water stress and carbon pricing mechanisms are addressed as risk factors. Transition finance, blue finance, access to sustainable finance and the expansion of the green loan portfolio are, meanwhile, assessed as key areas of opportunity. Within this framework, DenizBank shapes its strategic decisions in a way that will mitigate these risks and capitalise on these opportunities.

DenizBank is giving concrete form to its response to sustainability risks and opportunities under the following headings: increasing environmental impact financing, broadening access to financial services, developing responsible products and services, accelerating digital transformation and strengthening talent management. The financial implications of sustainability-related risks and opportunities are assessed from short-, medium- and long-term perspectives, in line with the Parent Company Bank's risk and opportunity inventory, relevant analytical studies and the time horizons set out in the strategy section. In this context, in the short term, factors that could have a direct impact on financial performance and operational results during the relevant reporting period, in relation to compliance with climate legislation, operational actions and budget cycles, are taken into account. In the medium term, risks and opportunities linked to revenue diversification, operational resilience and business model transformation are analysed within the framework of structural changes in the sector, technological transformation processes, shifts in customer expectations and strategic planning cycles. In the long term, the impact on the credit portfolio's risk profile, financial resilience and sustainable growth is assessed, taking into account the structural transformations caused by climate change, national and international commitments, capital allocation decisions and the shift towards sectors aligned with a low-carbon economy.

The Parent Company Bank has structured its strategy and business model to enhance resilience against sustainability-related risks. In this context, it addresses its operational and financed emissions through a holistic approach. It manages its environmental impacts through zero-waste practices and stakeholder partnerships.

Under this approach, the Parent Company Bank does not assess climate-related risks solely in terms of carbon-intensive activities or emissions reduction; it also considers the potential impacts of the physical effects of climate change on its strategy and business model. In the ICAAP, climate risk is addressed as a risk area encompassing physical and transition risks. It is emphasised that these risks must be assessed alongside their potential impacts on the business model, cash flows, financial position and financial performance.

With specific regard to climate change, DenizBank is developing its strategy with the flexibility to adapt to climate-related uncertainties and the dynamics of transition.In line with Türkiye's 2053 net-zero targets and the decarbonisation targets set in accordance with the ENBD's approach, priority is given to supporting the transition in high-emission sectors and financing low-carbon investments. This approach enhances the resilience of the Parent Company Bank's business model against both transition risks and climate-related physical risks.

DenizBank manages risks and effectively evaluates opportunities relating to sustainability issues of very high priority across the Group. In this context, the 2025 performance results, which are aligned with the value areas of its strategy, are presented. The relationship between these results and the relevant sections of the 2025 TSRS Report, in accordance with TSRS-related disclosure requirements, is set out in the table.

Strategy

Value Area	2024 Outcomes	2025 Outcomes	Relevant Section of the TSRS Report
Next-Generation Banking	• MobilDeniz now includes investment products with 163 transaction types and 463 functions. • Environmentally friendly applications such as Corporate Digital Approval, TR QR Code and Digital Receipt have been rolled out. • POSum Cepte has helped reduce paper, plastic and electronic waste.	The number of sustainability-focused collaborations has increased.	• Strategy • Risk Management • Metrics & Targets
Sustainable Finance	• Green and social financing totalling US$3.2 billion has been secured. • New sustainable finance products (e.g. DGRTKST) have been developed. • The share of sustainability-related funding has risen to 47%.	The total amount of sustainability-related funding reached 3.4 billion USD, with 53% of the wholesale funding portfolio comprising sustainability-themed loans. Under the Green Bond programme, 370 million USD in financing was secured from IFC, European Bank for Reconstruction and Development (EBRD), Proparco and Asian Development Bank (ADB). Through two transactions involving 83 participants, the size of the syndicated loans secured under the sustainable finance framework reached 2.2 billion USD.	• Strategy • Risk Management • Metrics & Targets
Corporate Foundations	• A digital data infrastructure has been established to enable Group-wide reporting. • Zero Waste certificates have been obtained for 546 sites. • Data privacy, systematic risk and ethics management practices have been strengthened.	The first TSRS-compliant report has been published. The duties and responsibilities of the Sustainability Committee have been updated. A Sustainable Finance team has been established.	• Strategy • Risk Management • Metrics & Targets
Transition to a Low-Carbon Economy	• Scope 1–2 emissions at the Group level have been calculated for the first time and limited assurance has been obtained. • Financed emissions (PCAF methodology) have been calculated. • A Climate Risk & Opportunity Analysis has been carried out.	As part of the decarbonisation roadmap being developed to achieve the 2053 Net-Zero target, seven priority sectors have been identified. The Group Climate Risk Policy has been published. A Climate Risk and Opportunity Analysis has been carried out. Coal-related activities have been included in the List of Non-Financed Activities. With the commissioning of the Erzurum SPP facility, 4,610 MWh of electricity was generated from an installed capacity of 2,360 kWe, of which 3,488 MWh was used for self-consumption. A 14% reduction in Scope 1+2 emissions was achieved compared to 2024.	• Strategy • Risk Management • Metrics & Targets

Decarbonisation Strategy

Under the heading of "Climate Action", which forms part of DenizBank's sustainability strategy, work is continuing to structure the decarbonisation approach at a corporate level. As part of these efforts, the aim is to design the Decarbonisation Strategy developed at the Parent Company Bank level in a manner consistent with the Group-wide emission reduction targets adopted by the Group, and to support this with complementary implementation roadmaps.

The Parent Company Bank is digitising its emission calculation processes to strengthen its decarbonisation approach. This framework, developed to comprehensively monitor emissions arising from operational activities and the value chain, is supported by data optimisation initiatives. In this context, Scope 1, Scope 2 and Scope 3 emissions are measured in accordance with the GHG Protocol, with the aim of improving sustainability performance at both the Parent Company Bank and Group levels.

DenizBank is drawing up a decarbonisation roadmap in line with its 2053 net-zero targets. The priority sectors in this context are listed below:

- Energy production
- Iron and steel production
- Cement production
- Fossil fuel mining and processing
- Maritime transport

These sectors are prioritised based on their emission intensities and transition needs, and sector-specific transition processes are closely monitored. In addition to the five main sectors, the Parent Company Bank also optionally includes the road transport and automotive sectors in its inventory.

Under the strategy developed at DenizBank level, target scenarios are formulated based on the SBTi methodology. In the short term, the aim is to reduce Scope 1 and Scope 2 emissions, and the use of renewable energy is regarded as one of the key tools.

Work is underway to measure financed emissions. In this context, the PCAF methodology is being used for high-impact sectors and customers, and the data infrastructure is being developed. In the coming period, it is planned to set sectoral portfolio targets in line with international frameworks.

During the current reporting period, within the scope of the TSRS report, the Scope 1 and Scope 2 emissions inventory for the Group as a whole is presented by breakdown. Sustainability-related risks and opportunities are identified through screening exercises conducted across the Group. As there is no disaggregated analysis by affiliated companies, disclosures are made with a focus on the parent company, DenizBank. In this context, the TSRS Sector Guides are taken into account, and disclosures are provided only for the metrics included in the Commercial Banks Guide.

Compliance Roadmap

DenizBank is progressively integrating climate change-related risks and opportunities into its strategy, risk management and decision-making processes in order to comply with the requirements under TSRS 1 and TSRS 2. The compliance roadmap developed in this context aims to enhance the Parent Company Bank's resilience to climate risks and strengthen its sustainable financing capacity.

In line with the transition plan approach envisaged under TSRS 2, efforts are ongoing to integrate the outputs of scenario analysis into governance processes. Within this framework, the Parent Company Bank aims to maintain its consolidated capital adequacy and strengthen its financial resilience against climate-related shocks. At the same time, plans are in place to increase the proportion of green assets specifically at DenizBank A.Ş., in line with the Group's overall asset structure.

The materiality assessment carried out during the current reporting period has been significantly expanded and deepened compared with the approach taken in previous periods. Within this framework, the value chain analysis has been comprehensively restructured to encompass not only the Parent Company Bank's own operations but also upstream elements (suppliers, service providers) and downstream elements (customers and counterparties in the credit and investment portfolios). In the financial materiality threshold methodology, the approach has shifted from one defined in terms of CET1 and the Capital Adequacy Ratio to one aligned with financial performance indicators, using a threshold of 5% of Profit Before Tax. In addition to quantitative assessment, qualitative assessment criteria (strategic alignment, regulatory framework, geographical concentration, stakeholder expectations, reputational impact, long-term value creation capacity) have been systematically applied; these have been supported by scenario analyses, workshops and stakeholder engagement processes. As a result of this expanded approach, the risks and opportunities deemed significant in the current period reflect a more comprehensive sectoral sample, geographical exposure framework and perspective on opportunities compared with the previous period's approach, thereby strengthening the integration of climate and sustainability considerations into the Parent Company Bank's strategy and decision-making processes.

DenizBank is working to measure the financial impacts of sustainability-related risks and opportunities. In this context, the aim is to disclose these risks and opportunities by linking them to the financial statements in future reporting periods. This will ensure that financial impacts are presented in a transparent and comparable manner in accordance with TSRS 1.

With regard to climate change-related metrics, GHG emissions are calculated across the Group on a subsidiary-by-subsidiary basis and reported under the section titled Metrics and Targets. This approach enables emissions to be tracked comprehensively and consistently.

With the aim of making sustainability approach more holistic across the Group, efforts are being made to establish a framework that is aligned with ENBD's decarbonisation strategy and Climate Risk Policy. In this regard, the intitiatives implemented at DenizBank A.Ş. are intended to extend to the entire the Group.

As part of this roadmap, DenizBank is systematically identifying and monitoring climate change-related risks and opportunities. The actions in response to the identified risks and opportunities are intended to be supported by more advanced data infrastructure and analytics in the coming periods, with the aim of achieving full compliance with TSRS requirements.

Risk Management

The Parent Company Bank's risk management approach is structured in line with its sustainable growth objectives and in compliance with local legislation, regulatory requirements and international standards. Responsibilities for the identification, assessment, prioritisation and monitoring of sustainability and climate-related risks are carried out by the Board of Directors, and the governance structure relating to this framework is detailed in the **Governance** section of the report. Sustainability and climate-related risks are integrated into the risk measurement and management processes.

The Group's risk management processes are conducted in direct alignment with the Group policies and strategic guidance of its majority shareholder, ENBD. In this context, ENBD ensures oversight at the highest level by establishing the risk management framework and risk appetite statements. As the Group, the principle of compliance is adopted to foster a shared risk culture. Risk Management is structured in proportion to the Group's portfolio, business areas and risk profiles. The Parent Company Bank designs initiatives to enhance resilience and management of sustainability and climate-related risks through effective risk management practices.

DenizBank implements a risk management model based on the Three Lines of Defence framework throughout the risk lifecycle to ensure the effective management of sustainability and climate-related risks:

1 First Line of Defence

Comprises the business units and operational functions that carry out the Parent Company Bank's activities, and assumes direct ownership and management of risks, including those related to sustainability and climate. Within this framework, compliance is ensured with the policies, frameworks and risk limits established by the second line of defence; risks are identified, initial risk assessments are carried out for new products and transactions, and the necessary controls and measures are implemented to ensure compliance with limits.

Corporate and Commercial Banking, SME and Agricultural Banking, and Retail Banking form the Parent Company Bank's first line of defence.

2 Second Line of Defence

Establishes and oversees the Parent Company Bank's risk management framework,including sustainability and climate-related risks, through risk management, internal control and compliance functions. Risk appetite and risk limits are determined, risks are assessed independently, stress tests and forward-looking analyses are conducted, and risk levels are regularly monitored and reported to senior management. The Credit Allocation Group[3] and the Risk Management Group constitute the Parent Company Bank's second line of defence.

[3] All allocation teams except for the Individual Credit Allocation team

3 Third Line of Defence

Independently assesses the effectiveness of the Parent Company Bank's risk management system, including sustainability and climate-related risks, and its compliance with legal regulations through the internal audit function. Findings are reported to senior management, and the implementation of necessary improvement measures is monitored to ensure the integrity of the risk management framework. The Audit Committee is the Parent Company Bank's third line of defence.

Risk Management Processes

Risk management processes are structured to ensure that the Parent Company Bank addresses its financial and non-financial risks, as well as sustainability and climate-related risks, in a systematic and consistent manner. The operation of these processes is supported by the policies, methodologies and governance mechanisms defined within the Group Risk Management Framework (RMF).

It is stated that within the Parent Company Bank's risk management framework, key financial and non-financial risks, including climate risks, are identified; and that these risks are managed through measurement, monitoring and reporting processes within the framework of the three-line-of-defence model. In this context, climate risk is addressed as a risk area encompassing physical and transition risks, linked to data collection, oversight by the Sustainability Committee and integration with the Risk Appetite Statement.

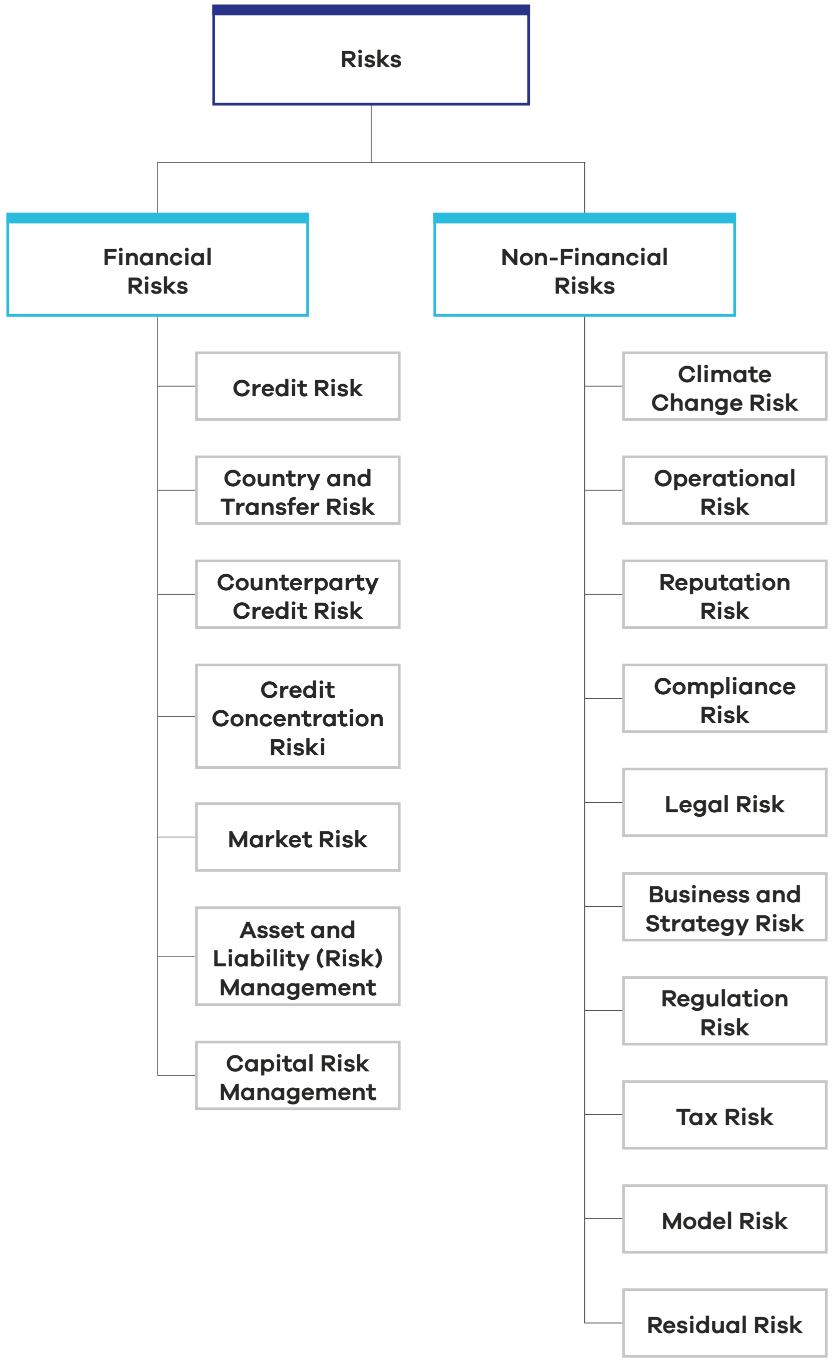
DenizBank Risk Management Framework

The DenizBank Risk Management Framework (RMF) comprises the following components: risk governance; the identification and scoping of risks; the assessment of the risk profile; the formulation, monitoring and reporting of the risk appetite statement; financial and non-financial risks; audit functions; and subsidiaries and international branches. The framework is structured to ensure the proactive management of risks through policies, standards, organisational structures, approval authorities, and measurement, monitoring, reporting and control processes.

The Parent Company Bank assesses sustainability and climate-related risks not as a separate risk category within the existing RMF, but as a risk factor affecting existing financial and non-financial risk categories. In this context, the potential impacts of physical and transition risks associated with climate change on credit risk, operational risk, strategic risk, reputational risk and risks related to access to funding sources are analysed in conjunction with customer activities, sector dynamics, collateral structures, operational processes and regulatory frameworks. Climate-related risks are thus integrated into the Parent Company Bank's existing risk identification, assessment, monitoring and reporting processes and managed from a holistic perspective.

The DenizBank Risk Management Framework is a framework applicable across the Group. The risk categories covered by the framework are:

Risk Management



Opportunity Management Processes

Opportunity management aims to enable the Parent Company Bank to systematically identify, assess and prioritise areas with long-term value creation potential by addressing sustainability and climate-related developments from a strategic perspective. In this context, sustainability and climate-related opportunities are analysed across the Parent Company Bank's business model, product and service portfolio, customer segments and value chain, and are addressed in a manner consistent with risk management processes.

In this context, the Parent Company Bank takes into account the emission reduction, climate adaptation and green transition targets set out in Türkiye's National Contribution Statement, as well as the priorities for sustainable growth, green finance and low-carbon economic transition defined in the Medium-Term Programme, in its opportunity management processes.

The targets and priorities set out in national policy documents and medium-term development plans provide input for the Parent Company Bank's sector-based analyses, product and financing designs, and loan portfolio guidance, thereby contributing to the early identification of climate- and environment-focused investment areas. Consequently, in line with national legislation, the Parent Company Bank supports its clients' transition investments, proactively assesses green and sustainable financing opportunities, and strengthens long-term value creation.

Inputs, Parameters and Scope Used in the Processes

The inputs, parameters and scope elements used in the assessment of climate-related risks are addressed in a manner that is integrated with the Parent Company Bank's existing risk management processes. In this context, climate-related inputs (e.g. climate scenarios, sector- and customer-specific exposure data, emission intensities, geographical risk indicators, and regulatory expectations) are assessed in conjunction with the existing datasets & methodologies used to evaluate credit, market, liquidity, operational, and strategic risks.

Scenario analyses, stress tests, risk appetite metrics, and probability-impact assessments used to measure climate risks are applied to determine the impact of physical and transition risks on the Parent Company Bank's risk profile. The parameters used in these processes are adapted to assess the potential impacts of climate change on customers' repayment capacity, , operational continuity, funding conditions and financial performance, and are linked to the relevant risk types.

In this regard, rather than treating climate risks as a separate area of assessment, the Parent Company Bank integrates them into its existing risk management tools and decision-making mechanisms, thereby assessing their impact across all key risk categories using a holistic approach.

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Key Inputs

The Guide on the Management of Climate-Related Financial Risks
BRSA has issued The Guide on the Management of Climate-Related Financial Risks to enable banks to manage such risks effectively; this guide came into force in July 2025.

The Guide identifies physical and transition risks and sets out the fundamental principles and guidelines that will ensure climate-related financial risks are addressed and monitored holistically within the framework of banks' risk management functions. In addition to supporting compliance with national regulations, it provides a guiding framework that encourages the adoption of international best practices in the banking sector. In this regard, the Parent Company Bank takes into account the "Guide on the Management of Climate-Related Financial Risks" in its risk inventory, in line with the requirements of BRSA.

ENBD Group Climate Risk Policy
The ENBD Group Climate Risk Policy sets out high-level principles for the identification, measurement and management of climate risks across the Group. The policy provides a framework for assessing the financial and non-financial impacts of climate risk, covering physical, transition and liability risks.

The inputs used in climate risk processes consist of climate scenarios, regulatory expectations, sector- and customer-specific exposure data, and macroeconomic indicators. These inputs are used to analyse the transmission channels through which climate risk affects credit, market, liquidity and operational risks.

The Group Policy identifies climate risk ratings, the ESR (Environmental and Social Risk) scorecard, stress test results, calculations of financed emissions and mitigation roadmaps as key inputs to climate risk processes. It sets out that these inputs will be used to monitor and report on risks at customer and portfolio level, and to identify mitigation actions. The fact that the "Net-Zero 2050", "Delayed Transition" and "Current Policies" scenarios are defined within the policy demonstrates that a comprehensive climate risk management framework, aligned with the Group, has been established by linking physical and transition risks to different scenarios and impact channels.

Internal Capital Adequacy Assessment Process (ICAAP) Report
ICAAP enables the measurement of the impact of climate risk on capital adequacy as part of the significant risks to which the Parent Company Bank is exposed. In this context, physical and transition risk parameters relating to climate risk are converted into capital requirements through stress testing and scenario analyses. In assessing risks, short-, medium- and long-term

Risk Management

time horizons are taken into account, and forward-looking capital adequacy projections are produced. ICAAP thus serves as an integrated assessment tool that enables climate risk to be addressed in a manner linked to capital adequacy, risk appetite and strategic planning processes.

DenizBank Risk Appetite Statement
The metrics and limits established in relation to climate risk and sustainability issues under the DenizBank Risk Appetite Statement are being integrated into risk management processes. The Risk Appetite Statement indicates that, within the scope of sustainability, a zero risk appetite for thermal coal financing, the scope of loans subject to Environmental and Social Risk Assessments, and the monitoring of financed emissions metrics demonstrate that climate-related risks are linked to the loan portfolio and the overall risk appetite framework. The inclusion of these metrics in reporting, limit monitoring and action plan processes contributes to the Parent Company Bank's assessment of climate risks through an integrated approach within its overall risk management framework.

DenizBank Climate Risk Policy
DenizBank's Climate Risk Policy is the key policy document that ensures the integration of physical and transition risks arising from climate change into the Parent Company Bank's risk management framework. Under this policy, climate risk is addressed through an integrated approach, taking into account its impacts on credit, market, liquidity and operational risks.

The inputs used in climate risk assessment processes consist of customer- and portfolio-based sector data, geographical risk indicators, climate scenarios and regulatory expectations. Based on these inputs, a materiality assessment of climate risk is carried out; the financial impacts of the risks are measured through scenario analyses and stress tests. This is detailed in the Strategy section of the report.

The policy aims to ensure that climate risk is systematically integrated into the Parent Company Bank's overall risk management processes by defining the Parent Company Bank's risk appetite in relation to climate risk, establishing monitoring and reporting mechanisms, and identifying risk-mitigating actions.

DenizBank Climate Risk Methodology
DenizBank's Climate Risk Methodology defines technical approaches for the quantitative assessment of transition and physical risks arising from climate change. As part of the methodology, the financial impacts of climate risks on the loan portfolio are measured through scenario analyses, stress tests and expected credit loss calculations.

The key inputs used in these processes comprise sector-specific emission intensities, carbon price assumptions, regulatory policy scenarios, customer financial data and macroeconomic projections. Based on these inputs, risk parameters are determined and the effects of climate risk on capital adequacy are calculated.

The methodology enables the integration of climate risk into the Parent Company Bank's overall risk management and ICAAP processes, thereby facilitating the systematic and comparable monitoring of the financial impacts of climate change.

Key Parameters

Scenario Analyses and Stress Tests
The Parent Company Bank utilises climate scenario analyses in the processes of identifying, assessing and prioritising physical and transition risks arising from climate change. These analyses enable a comprehensive assessment of the potential impacts of such risks on the Parent Company Bank's operations and risk profile under different climate policies, time horizons and socio-economic conditions.

In the studies carried out during the 2025 reporting period, Representative Concentration Pathways (RCP) and Shared Socio-Economic Pathways (SSP) scenarios, developed by the Intergovernmental Panel on Climate Change (IPCC), were used as a reference for identifying physical risks, whilst climate and sustainability scenarios published by the International Energy Agency (IEA) were used as a reference for identifying transition risks. Further details on scenario analyses and stress tests can be found in the Strategy section.

Probability and Impact Parameters
Under the Parent Company Bank's risk assessment methodology, risks are prioritised by taking into account probability and impact parameters. In this context, each risk is analysed on a scale of 1 to 5, based on a combined assessment of its probability of occurrence and its potential impact on operations. The probability parameter indicates the likelihood of a risk occurring in the short, medium and long term; a probability of less than 5% is classified as "very low", 5–20% as "low", 20–50% as "medium", 50–90% as "high" and over 90% as "very high". This approach enables a systematic measurement of the frequency with which risks occur, thereby facilitating a comparable assessment within the risk management process.

The impact parameter, on the other hand, refers to the potential consequences for the Parent Company Bank's financial performance, operating results and strategic objectives should the risk materialise. The impact level is assessed across five distinct categories, ranging from negligible financial losses to significant financial losses and strategic impacts that may necessitate a restructuring of the business model. The risk value, calculated by considering both the probability and impact parameters together, is used as a key input in the Parent Company Bank's risk prioritisation, management and monitoring processes; this supports the identification of critical risk areas and the planning of appropriate risk management actions.

Evaluation of the Impacts of Risks

The materiality assessment of sustainability and climate-related risks is being carried out to gather information on the extent of the Group's exposure to physical and transition risks and the level of their materiality. The Environmental and Social Risk Assessment is carried out within the framework of the Estimation of Financed Emissions and Mitigation Pathways, and the Climate Risk Scenario Analysis and Stress Test Results, based on the analyses permitted by the available data. The results of the assessment are submitted to the relevant committees for review, examination and approval.

Within the Group, the management of environmental and social impacts in lending processes is carried out in accordance with the "Policy on the Management of Environmental and Social Impacts in Lending Processes". Under this policy, the sector in which clients operate, the nature of the project, the level of environmental and social impact, and compliance with national and international legislation are taken into account during the loan approval process. Where necessary, additional environmental and social due diligence studies are carried out. Under the policy, the activities listed in the "List of Non-Financed Activities" attached hereto are not financed under any circumstances. For sectors with high transition risks and high carbon intensity, more detailed analyses are carried out due to changing regulations, rising costs and restrictions. In high-risk transactions, environmental and social obligations may be incorporated into contracts, and clients may be required to implement remedial actions.

Following the granting of credit, the Project Finance Group monitors environmental and social risk indicators, reports significant developments to the relevant committees, and ensures oversight by the first line of defence. Under this policy, processes are designed to support the proactive management of the financial impacts of the Group's sustainability and climate-related risks.

It is assessed that the financial impact of climate change on the Group's portfolio and operations may be transmitted through credit risk, market risk, liquidity risk, operational risk and insurance risk. In this context, the assessment of financial impact is primarily addressed through the credit risk portfolio, in line with the approach defined in the policy document. The implications of potential financial impacts on credit risk associated with credit allocation activities are assessed through climate risk stress testing and scenario analyses. During the assessment process, the impact of climate risk on the Parent Company Bank's financial resilience is analysed, taking into account defaults, climate risk exposure at portfolio level, sectors with high transition risk and high greenhouse gas emissions, and the emissions associated with the financing provided.

Risk Management

All risks identified during the risk identification process are subject to assessment. Risks are categorised into the following groups: irrelevant risks, significant risks, risks requiring management, and low-significance risks. The second line of defence is utilised to identify risks and assess their significance, and to develop methods for the assessment and management of risks.

In assessing transition risks, credit risks and the amount of credit risk exposure have been determined for the five carbon-intensive sectors (cement, electricity, fertilisers, iron and steel, and aluminium) under CBAM, based on the consolidated loan portfolio as at 31 December 2025. Subsequently, financial strength levels were categorised into five categories, ranging from default to a very strong financial structure, in accordance with the Internal Capital Adequacy Assessment Process (ICAAP) scale. In line with this classification, the current financial structures of credit customers have been categorised according to the provisioning stages set out in the Guidance on the Calculation of Expected Credit Loss Provisions in accordance with IFRS 9. A static analysis has been carried out within this framework.

Liquidity stress tests are carried out regularly, based on both bank-specific scenarios and pessimistic market-driven scenarios. Stress tests are conducted monthly by the Risk Management Group. The Treasury and Asset-Liability Management Groups also participate in the development of stress scenarios. The business units, meanwhile, contribute to the formulation of assumptions regarding credit growth or contraction.

When designing liquidity stress tests, the potential impacts of physical and transition risks associated with climate change on funding sources, deposit behaviour and market liquidity are also taken into account. Climate risks are assessed in conjunction with existing bank-internal and market-driven stress scenarios.

Prioritisation of Risks

The materiality assessment is carried out by the Board of Directors, which is the Parent Company Bank's authorised functional unit. When determining the materiality level of risks, the views and assessments of subject matter experts within the Parent Company Bank are taken into account.

The risk materiality assessment is based on the Parent Company Bank's comprehensive risk register. This register has been assessed in accordance with quantitative indicators linked to capital; exposure levels based on portfolio, position or volume of activity; the probability of the risk materialising; whether the risk falls within the scope of the Parent Company Bank's activities; and international regulatory frameworks (Basel II). You can find further details in the "Strategy" section.

The materiality assessment of climate risks is carried out to determine the Group's exposure to physical and transition risks and the level of materiality of these risks. This process enables the proactive monitoring and management of climate risks, whilst also helping to clarify critical risk areas and priority issues. The assessment work is carried out within the framework of analyses permitted by the available data; it encompasses environmental and social risk assessments, estimates of financed emissions along with mitigation pathways, and climate risk scenario analyses and stress test results. The findings are submitted to the relevant committees for review and approval.

With regard to mitigating climate risks, various actions are assessed, taking into account the significance of exposure and the environmental and social risk profiles of counterparties. Within this framework, business units may draw up mitigation plans where necessary; financing terms and contract provisions may be reviewed with a view to reducing clients' exposure to climate risks. The process is carried out in an integrated manner with the credit initiation and approval mechanisms, and the necessary documentation is provided. Furthermore, environmental and social risk assessments are reviewed annually. They are updated in line with changes in clients' risk profiles, and the implementation of the agreed mitigation plans and commitments is monitored periodically.

Monitoring of Risks

Periodic risk monitoring and review involves analysing changes in trends and events, as well as internal and external factors; identifying changes in risk levels, their causes and sources; developing risk mitigation and transfer strategies; and assessing the scope and effectiveness of the measures taken.

DenizBank's Risk Management Framework is reviewed once every three years, whilst the Climate Risk Policy is reviewed at least once a year. In line with this, the inventory of the Parent Company Bank's risks and opportunities is regularly and frequently reviewed and updated, subject to approval by the Board of Directors.

The Risk Management Group is responsible for carrying out activities aimed at monitoring the risks to which the Parent Company Bank is exposed or is likely to be exposed, within the framework of the principles established in conjunction with the Parent Company Bank's Senior Management and approved by the Board of Directors, in accordance with the Group's Risk Appetite Statement. The ratio of quantified risks relating to capital plan limit breaches, as identified through stress testing under the ICAAP framework, is one of the metrics monitored by the Risk Management Group within the scope of the statement.

The Group actively monitors the climate risks to which it is exposed, as well as the emissions it finances, at both client and portfolio levels. Whilst the Risk Management Group monitors climate risks at portfolio level, the business units at client level monitor any activities that could adversely affect efforts to combat climate change, or potential non-compliance with the Group policies.

With regard to the monitoring of climate risks, the relevant Parent Company Bank departments forward the risk metric values obtained from their calculations to the Risk Management Group. The Risk Management Group consolidates the values received and reports them to members of the Finance, Credit, Risk Management and Treasury Departments, comparing them against risk appetite limits. Members of the relevant departments are thus able to monitor risk appetite metrics.

The Sustainability Committee is responsible for the implementation and development of the Sustainability Strategy, as defined in accordance with DenizBank's policies and procedures, and for monitoring sustainability performance; it also oversees environmental and social risk management activities. With the exception of individual customers, an Environmental and Social Risk Assessment (ESRA) is applied to two customer groups at DenizBank that meet the specified turnover and credit amount thresholds. The development of the ratio of the total risk assessed through the ESRA to the total assessed portfolio is monitored and reported on a monthly basis.

Climate and sustainability risks affecting operational activities are matched against the central risk pool, alongside actual events, controls, action plans and insurance policies. Process management is carried out via software integrated into the core banking system. Risk cards relating to sustainability and climate risks can be monitored and updated by the relevant departments. Furthermore, external events, business continuity plans and scenario analysis studies are also tracked via the integrated system, ensuring the holistic management of sustainability and climate risks.

Changes Compared To The Previous Period and Reporting Approach

During the reporting period, the framework for managing climate-related risks within the Group was strengthened; as part of this, the Group Climate Risk Policy was published in March 2025. This policy sets out the fundamental principles for identifying, measuring, monitoring and reporting physical and transition risks linked to climate change.

Furthermore, the DenizBank Risk Management Framework was reviewed during the reporting period; however, no changes were made to the framework's overall structure, risk categories or implementation principles. Similarly, the DenizBank Risk Appetite Statement was also reviewed, and no updates were made to the current risk appetite levels or limit structure.

Metrics and Targets

DenizBank discloses its metrics and targets, which are aligned with its governance structure, risk management processes and strategic priorities, with the aim of effectively monitoring and managing sustainability and climate-related risks and opportunities. These disclosures enable users of general-purpose financial reports to assess the Parent Company Bank's resilience in relation to sustainability and climate-related issues, its capacity to adapt to changing conditions, and its approach to long-term value creation.

Disclosures made in accordance with TSRS are based on the principle of presenting metrics and targets relating to relevant risks and opportunities in a clear, consistent and comparable manner. The metrics identified are designed to be directly linked to DenizBank's core business areas. In this context, the metrics and targets are structured taking environmental and social impacts into account.

DenizBank aims to integrate sustainability and climate-related criteria into its decision-making processes and to set targets that will deliver measurable progress. As part of this approach, the Parent Company Bank also aims to monitor strategic initiatives and concrete action plans that support the effective management of sustainability and climate-related risks and opportunities, using metrics and targets.

Key principles in the reporting process include ensuring continuity, comparability and accuracy. Should any changes occur in the metrics or methodologies, these changes are disclosed to the public.

Sustainability and Climate-Related Metrics

DenizBank reports on sustainability and climate-related metrics defined in accordance with the relevant sectoral requirements, based on the guidelines under the TSRS framework regarding the sector-specific application of TSRS 2: Sector Specific Guidance Volume 15 – Asset Management and Custody Activities, Sector Specific Guidance Volume 16 – Commercial Banks, and Sector Specific Guidance Volume 18 – Investment Banking and Brokerage – and reports on the sustainability and climate-related metrics defined in accordance with the relevant sector-specific requirements. In addition to the TSRS sector specific guidance volumes, the Global Reporting Initiative (GRI) has been taken into account due to the inclusion of SASB disclosures and referenced metrics. The metrics identified under this guidance are made available to the public under the heading 'Sectoral and Cross-Industry Metrics' in the report. Furthermore, when disclosing greenhouse gas emissions, data for DenizBank and its consolidated subsidiaries have been reported.

To ensure the effective monitoring of the impacts of sustainability and climate-related risks and opportunities, DenizBank has adopted an approach aligned with the sustainability, climate and decarbonisation targets set within the Group. The metrics used in this context are handled in a manner that ensures consistency with the Group's long-term sustainability and climate strategies and are considered an integral part of the Parent Company Bank's sustainability management processes. Furthermore, the monitoring of sustainability performance and its integration into strategic decision-making processes are supported.

Greenhouse Gas Emissions

Under the TSRS, the Group considers greenhouse gas emissions to be a key metric amongst the core indicators for monitoring sustainability and climate-related performance.

In this context, DenizBank aims to measure its sustainability and climate performance by monitoring greenhouse gas emissions arising from its operational activities, and to report on progress over time in a transparent manner.

The emissions calculation and reporting activities carried out within the Group are conducted in accordance with internationally recognised methodologies. In this context, the Greenhouse Gas Protocol: Corporate Accounting and Reporting Standard (2004) serves as the basis for calculating greenhouse gas emissions. The methods and assumptions used are grounded in nationally and internationally recognised data sources and reference documents. When calculating emissions, absolute gross Scope 1 and Scope 2 greenhouse gas emissions are taken into account in tonnes of carbon dioxide equivalent (CO_2e).

DenizBank exercises financial and operational control over all its subsidiaries and associates. In determining the reporting boundaries for the measurement and monitoring of emissions, DenizBank has adopted a financial control approach.

Scope 1 emissions refer to greenhouse gas emissions resulting from sources directly controlled by the Group. Within this scope, direct emissions arising from stationary and mobile combustion activities are monitored, and the relevant activity data are calculated on a regular basis. These emissions include direct greenhouse gas emissions resulting from fuel consumption and similar activities carried out within the scope of the Group operations.

Scope 2 emissions, on the other hand, cover indirect greenhouse gas emissions resulting from the consumption of purchased electricity. Indirect emissions are determined and reported

through calculations based on operational data relating to electricity consumption. The calculations carried out under this scope enable the monitoring of the environmental impacts of energy use arising from the Group's operational activities.

The emission factors used in the calculation of greenhouse gas emissions are sourced from reliable national and international sources. For the calculation of emissions from stationary combustion activities, the methodologies relating to the energy sector set out in the "Guidelines for National Greenhouse Gas Inventories" (2006), published by the Intergovernmental Panel on Climate Change (IPCC), are used as a reference. For the calculation of emissions from electricity consumption, the latest electricity emission factors published by the International Energy Agency (IEA) for Türkiye are used. For the calculation of vehicle-related emissions, the CO_2, CH_4 and N_2O emission factors specified by the IPCC for mobile combustion sources are used. Furthermore, to ensure that emission calculation methodologies remain up to date, the latest scientific findings and global warming potentials presented in the IPCC's Sixth Assessment Report (AR6) are monitored and taken into account in the reporting processes.

The principles of transparency and comparability form the basis of the emission calculation and reporting processes carried out within the Group. Accordingly, the methodologies, data sources and calculation assumptions used are clearly disclosed within the scope of the reporting. The aim is to maintain continuity and reliability in sustainability reporting by providing stakeholders with the necessary explanations regarding any changes that may occur in emission calculation methods or the scope of reporting.

The Group is undertaking initiatives to enhance its data collection and analysis capabilities in order to monitor the impacts of sustainability and climate-related risks and opportunities more effectively. In this regard, plans are in place to expand the scope of emissions data, refine methodologies and increase the analytical depth of the reported indicators. The ultimate goal is to assess sustainability and climate-related performance more comprehensively and to provide transparent information to stakeholders. Work in this area continued throughout the reporting period.

The sustainability and climate-related studies carried out during the current reporting period involves certain uncertainties and assumptions due to factors such as data availability, methodological maturity and the level of development of external frameworks. In greenhouse gas emissions calculations, activity data, emission factors and conversion factors relating to Scope 1 and Scope 2 items contain elements based on estimates. The ongoing development of the IT infrastructure for the classification of green and social credits means that judgements based on professional judgement continue to be used in classifications relating to sustainable finance metrics. Furthermore, the assumptions regarding carbon price paths, free allocation rates, sector-specific emission intensities, water stress projections and macroeconomic parameters used in scenario analyses and financial impact studies carry uncertainties stemming from methodological constraints specific to long-term projections and the update frequencies of external data providers.

These uncertainties and assumptions are explicitly taken into account when assessing the relevant risks and opportunities and in decision-making processes.

The outputs of scenario analyses are presented across low, medium and high scenario ranges, enabling a transparent assessment of potential impacts under different future scenarios. The Group continues its efforts to improve data quality, align methodologies with international best practices, and ensure continuity and comparability in reporting processes; any changes to metrics or methodologies are shared with the public. This approach ensures that existing uncertainties are explained transparently, whilst also contributing to the reporting achieving a higher level of analytical depth and accuracy in subsequent periods.

The Carbon Footprint Optimisation Project, has been launched with the aims to ensure that data collection and emission calculation processes at the Group-level are carried out systematically in a digital environment. As part of the project, efforts are underway to enhance data collection and analysis capabilities with a focus on more efficient assessment of the impact of sustainability and climate-related risks and opportunities on business decisions across all business lines and areas of operation. In this regard, the aim is to improve the quality of emissions calculations through the digitalisation and optimisation of data processes, and it is planned to complete the relevant work in the coming period.

Denizbank did not purchase any carbon credits during the reporting period.

Reporting Scope and Approach
Denizbank A.Ş. exercises financial and operational control over all its subsidiaries. The consolidation of share issues has been carried out in accordance with the financial control approach.

The share issues of companies owned by Denizbank A.Ş.'s subsidiaries (the "subsidiaries") have been consolidated within the parent company.

Metrics and Targets

DFSG Greenhouse Gas Emissions

Greenhouse Gas Emissions* (tonnes of CO_2e)	2024				2025				Change (%)			
	Scope 1	Scope 2 (Location-based)	Scope 2 (Market-Based)	Total	Scope 1	Scope 2 (Location-based)	Scope 2 (Market-Based)	Total	Scope 1	Scope 2 (Location-based)	Scope 2 (Market-Based)	Total
The Group	15,594	26,410	26,410	42,004	14,083	24,500	24,500	38,583	-9.69	-7.23	-7.23	-8.14
Denizbank A,Ş,	14,676	21,480	21,480	36,156	13,310	20,406	20,406	33,716	-9.31	-5.00	-5.00	-6.75
Deniz Faktoring A,Ş,	43	92	92	135	42	91	91	133	-2.33	-1.09	-1.09	-1.48
Deniz Finansal Kiralama A,Ş,	108	156	156	265	91	191	191	282	-15.74	22.44	22.44	6.42
Deniz Finansal Kiralama A,Ş,	81	156	156	237	72	155	155	227	-11.11	-0.64	-0.64	-4.22
Ekspres Gayrimenkul Turizm Yatırım İşl, ve Tic, A,Ş,	27	0	0	27	19	36	36	55	-29.63	-	-	103.70
Deniz Yatırım Menkul Kıymetler A,Ş,	63	303	303	366	75	300	300	375	19.05	-0.99	-0.99	2.46
Deniz Yatırım Menkul Kıymetler A,Ş,	41	228	228	270	55	226	226	281	34.15	-0.88	-0.88	4.07
Deniz Portföy Yönetimi A,Ş,	22	74	74	96	20	74	74	94	-9.09	0.00	0.00	-2.08
Intertech Bilgi İşlem ve Pazarlama A,Ş,	372	1,164	1,164	1,536	371	1,650	1,650	2,021	-0.27	41.75	41.75	31.58
Intertech Bilgi İşlem ve Pazarlama A,Ş,	333	971	971	1,304	342	1,406	1,406	1,748	2.70	44.80	44.80	34.05
Neohub Bulut Teknolojileri A,Ş,	39	192	192	232	29	244	244	273	-25.64	27.08	27.08	17.67
Deniz Gayrimenkul Yatırım Ortaklığı A,Ş,	274	3,027	3,027	3,301	149	1,563	1,563	1,712	-45.62	-48.36	-48.36	-48.14
Deniz Gayrimenkul Yatırım Ortaklığı A,Ş,	20	38	38	58	13	38	38	51	-35.00	0.00	0.00	-12.07
İstiklal Avm	211	2,013	2,013	2,224	89	619	619	708	-57.82	-69.25	-69.25	-68.17
Le Chic Bodrum	44	975	975	1,019	47	906	906	953	6.82	-7.08	-7.08	-6.48
DenizBank AG (Wien)	32	67	67	99	29	47	47	76	-9.38	-29.85	-29.85	-23.23
JSC DenizBank Moscow	6	60	60	66	5	135	135	140	-16.67	125.00	125.00	112.12
DenizÖde Elektronik Para ve Ödeme Hiz, A,Ş,	19	61	61	81	9	118	118	127	-52.63	93.44	93.44	56.79

**Greenhouse gas emissions calculations have been carried out to cover the reporting period from 1 January 2025 to 31 December 2025*

Greenhouse gas emissions for 2025 showed a downward trend at the consolidated the Group level when compared with 2024. Our Scope 1 emissions fell by 9.69%, our Scope 2 (location-based) emissions by 7.23%, and our total emissions by 8.14%. The primary driver of this improvement was the 6.75% reduction in total emissions recorded by Denizbank A.Ş., which accounts for the largest share of total emissions; energy efficiency measures, the wider adoption of sustainable resource use and actions relating to fleet management have contributed to this result.

The most significant reduction among Group companies was achieved by Deniz Gayrimenkul Yatırım Ortaklığı A.Ş., where total emissions fell by 48.14%, driven by improvements in the energy consumption profile of the properties in its portfolio. Key factors in this reduction included a significant decrease in electricity consumption at İstiklal AVM, a subsidiary of the Group (a 68.17% reduction in total emissions), changes in the tenant occupancy profile, and energy management practices in communal areas.

Due to the impact of increased electricity consumption related to its technology infrastructure, Intertech Information Processing and Marketing A.Ş.'s total emissions rose by 31.58%. This increase was driven by the expansion of data centre and cloud infrastructure capacity, as well as a 27.08% rise in Scope 2 emissions at the associated company Neohub Cloud Technologies A.Ş.

Driven by growth in the scale of operations, the total emissions of JSC DenizBank Moscow and DenizÖde Electronic Money and Payment Services Inc. rose by 112.12% and 56.79%, respectively. The increase at JSC DenizBank Moscow stems from a rise in electricity consumption linked to the expansion of its branch network and operational capacity, whilst the increase observed at DenizÖde is attributable to a rise in data processing and office energy consumption, in line with the growth in digital payment transaction volumes.

The 103.70% increase in total emissions reported by Ekspres Gayrimenkul Turizm Yatırım İşl. ve Tic. A.Ş. is due to Scope 2 emissions—which were reported as zero in 2024—being included in the calculation in 2025 following the commencement of monitoring of electricity consumption and the expansion of the reporting scope.

The 34.15% increase in Scope 1 emissions at Deniz Yatırım Menkul Kıymetler A.Ş. is attributable to higher fuel consumption for fleet operations and heating; however, as the absolute value remains low, its impact on the consolidated total is limited.

The 23.23% decrease recorded in DenizBank AG (Vienna)'s total emissions, on the other hand, is attributable to the increased share of renewable energy sources in electricity supply and the efficiency gains achieved in managing office energy consumption.

Sector-Specific and Cross-Industry Metrics

The metrics used during the reporting period have been reviewed to present key information relating to sustainability and climate change, and to structure the explanations in a more comprehensive manner. In this context, the relevance within the report of indicators that do not directly contribute to the monitoring of sustainability-related risks, opportunities or defined targets has been assessed. The approach taken was to retain those metrics directly used in monitoring strategic priorities and performance. The objective was to present the set of metrics in a structure that is more clearly linked to the risk and opportunity areas covered in the report, thereby supporting decision-making and progress monitoring.

Metrics and Targets

DenizBank Sustainability and Climate-Related Metrics

Value Area	No	Material Topic	Disclosure Topic	Type	Unit	Source	Sustainability and Climate-Related Risks	Sustainability and Climate-Related Opportunities	2024	2025	%
Sustainable Financing	1	Environmental Impact Financing	Number of customers assessed from an environmental and social perspective – DenizBank	Metric	TL	Internal	Carbon financing mechanisms Climate related drought / water-stress	• Market opportunity – Expansion of the green loan portfolio • Transition finance • Financing opportunity – Access to sustainable finance • Carbon pricing mechanisms	136,674	448,250	228%
			Amount of sustainability-related financing	Metric	USD	Internal	Carbon pricing mechanisms	• Market opportunity – Expansion of the green loan portfolio • Transition finance • Financing opportunity – Access to sustainable finance • Blue finance	3.2 billion	3.4 billion	6.25%
	2	Responsible Products and Services	Adverse events and penalties incurred – the Group	Metric	Quantity	GRI 205,406	Legal risk – Cyber security risk	Other	0	0	-
			Sustainability-related products and services – DenizBank	Metric	Quantity	GRI 417	Carbon pricing mechanisms	• Market opportunity – Expansion of the green loan portfolio • Transition finance • Blue Finance • Financing opportunity – Access to sustainable finance	10	10	-
	3	Access to Financial Services	Issuer cardholder – DenizBank	Metric	Quantity	Internal	Climate related drought / water-stress	• Blue Finance • Market opportunity – Expansion of the green loan portfolio	+500 thousand	+500 thousand	-
Future Talent	4	Attracting and Retaining Talent	Employee turnover rate – the Group	Metric	%	GRI 401	Other	Other	22.9	17.5	-23.58%
			Employee engagement score – the Group	Metric	Score, %	GRI 403,404	Other	Other	60	60	-
			Training hours per employee member – the Group	Metric	Hours	GRI 404	Carbon pricing mechanisms	Carbon pricing mechanisms	59	56	-5.08%
			Proportion of female managers – the Group	Metric	%	GRI 405	Other	Other	35	35	-
Next-Gen Banking	5	Digitalisation and Innovation	Digital penetration rate among active customers – DenizBank	Metric	%	Internal	Other	• Financing opportunity – Access to sustainable financing	82	83	1.22%
			Cybersecurity incident – DenizBank	Metric	Quantity	Internal	Legal risk – Cyber security risk	Other	0	0	-
Transition to Low Carbon Economy	6	Climate Action	Scope 1 – Direct greenhouse gas emissions – the Group	Metric	tCO_2e	GHG Protocol	Carbon pricing mechanisms	• Transition finance • Market opportunity – Expansion of the green loan portfolio	15,594	14,083	-9.69%
			Scope 2 Indirect energy greenhouse gas emissions – the Group	Metric	tCO_2e	GHG Protocol	Carbon pricing mechanisms	• Transition finance • Market opportunity – Expansion of the green loan portfolio	26,410	24,500	-7.23%

Metrics and Targets

TSRS 2 Sector Specific Guidance Volume 15: Asset Management and Custody Activities

Volume 15 – Sustainability Disclosure Topics and Metrics

Topic	Metric	Category	Unit of Measure	Code	2024	2025
The Incorporation of Environmental, Social and Governance Factors into Investment Management and Consulting	(1) The integration of environmental, social and governance (ESG) issues, (2) sustainability-themed investment and (3) screening, by asset class, the amount of assets under management – DenizPortföy	Quantitative	Currency (thousands TL)	FN-AC-410a.1	1) Work has commenced to roll out the sustainability-related initiatives carried out at Denizbank A.Ş. under the Group Sustainability Management System across the entire Group, based on subject, objectives and metrics. In subsequent reporting periods, the implications of this will be reported specifically for Deniz Portföy where necessary. 2) Four funds focusing on sustainability and agriculture have been established. 3) The total size of the three sustainability funds is 133,445, whilst the size of the agriculture and food fund is 83,921.	1) DenizPortföy's ESG integration; a) the establishment of more ESG-themed funds, b) the adoption of environmental, social and governance criteria in portfolio selection, c) the inclusion of these criteria in fund prospectuses and offering documents. 2) Fund Codes: DenizPortföy manages eight sustainability and agriculture-themed funds, namely the DHM, DLD, DLG, DOT, EDT, BLD, FMV and DFC funds. 3) The total size of the eight sustainability and agriculture-themed funds under DenizPortföy's management is 143,556 Mn TL as of 2025.
	Definition of the approach to incorporating environmental, social and governance (ESG) factors into investment or wealth management processes and strategies – DenizPortföy	Discussion & Analysis	N/A	FN-AC-410a.2	Efforts have been launched to disseminate sustainability-related initiatives carried out at Denizbank A.Ş. across the entire Group, based on topics, objectives, and metrics, within the scope of the Group Sustainability Management System. In subsequent reporting periods, the implications of this initiative will be reported specifically for Deniz Portföy where necessary. We manage our investors' savings through the funds we have established with the goal of a sustainable future.	Deniz Portföy has adopted an approach aimed at integrating environmental, social and governance (ESG) factors into its investment decision-making processes, with a view to supporting long-term and sustainable value creation in its investment and wealth management processes. Within this framework, ESG factors are assessed not only in terms of the financial performance of the assets in which investments are made, but also in terms of their sustainability profile, corporate governance structure and ESG-related risks and opportunities.

Volume 15 – Performance Metrics

Performance Metric	Category	Unit of Measure	Code	2024	2025
Total assets under management (AUM) – DenizPortföy	Quantitative	Currency (thousands TL)	FN-AC-000.A	482,679,557	690,597,560

TSRS 2 Sector Specific Guidance Volume 16: Commercial Banks

Volume 16 – Sustainability Disclosure Topics and Metrics

Topic	Metric	Category	Unit of Measure	Code	2024	2025
Environmental, Social and Governance Factors Incorporated into Credit Analysis	Definition of the approach to incorporating environmental, social and governance (ESG) factors into credit analysis	Discussion & Analysis	N/A	FN-CB-410a.2	In 2024, following work carried out on the Parent Company Bank's internal systems, an IT project was completed to conduct ESG risk assessments for all loans other than retail loans. Feasibility studies are currently being carried out to determine how to incorporate these assessments into the customer credit analysis process.	The ESG risk assessment model developed in 2024 continues to be implemented. The model is treated as a living framework and is regularly updated. In this context, work is being carried out to develop sector-specific versions of the model for 'hard-to-abate' sectors such as energy, iron and steel, cement, fossil fuel mining and maritime transport. Furthermore, the model is being updated to meet the requirements of various bodies and legislation, particularly the Green Asset Ratio Regulation and regulations governing the calculation of greenhouse gas emissions.

Volume 16 – Performance Metrics

Performance Metric	Category	Unit of Measure	Code	2024	2025	Change (%)
By segment: (a) retail and (b) small business customers, the (1) number of current and savings accounts and (2)value	Quantitative	Count, Currency (thousands TL)	FN-CB-000.A	(a) (1)7,903,203 (2) 463,591,810 (b) (1)993,069 (2) 260,248,315	(a) (1)11,316,827 (2) 13,990,439,728 (b) (1)760,753 (2) 8,669,097,323	(a) (1) 43.19% (2) 2,917.84% (b) (1) -23.39% (2) 3,231.09%
By segment: (a) personal, (b) small business and (c) corporate loans, (1) the number of and (2) value[4]	Quantitative	Count, Currency (thousands TL)	FN-CB-000.B	(a) (1)4,257,478 (2) 195,970,955 (b) (1)660,978 (2) 512,503,184	(a) (1)3,256,556 (2) 3,248,588,984 (b) (1)6,047 (2) 8,902,453,377	(a) (1) – 23.51% (2) – 1,557.69% (b) (1) – 99.09% (2) – 1,637.05%

*Commercial loans are also included within corporate loans, in line with DenizBank's segmentation.

The 2025 performance metrics show significant changes in certain areas when compared with 2024. Under FN-CB-000.A, the number of retail customer accounts increased by 43.19%, demonstrating the expansion of our customer base. This increase reflects our customer acquisition efforts via digital channels and the growing demand for retail banking products. Conversely, the 23.39% decrease observed in the number of small business accounts stems from portfolio simplification initiatives aimed at clearing inactive accounts.

In terms of account and loan balances, very high rates of growth were observed: 2,917.84% in the retail segment and 3,231.09% in the small business segment; 1,557.69% for retail loan balances and 1,637.05% for small business loan balances. These increases were influenced by the nominal growth in deposit and loan balances within an inflationary environment, the impact of exchange rate fluctuations on balance sheet items, and updates to the scope and consolidation framework of the data reported in 2024. Consequently, comparability between the 2024 and 2025 figures is limited, and it is assessed that the relevant changes stem primarily from macroeconomic conditions and updates to the reporting scope.

The 99.09% decrease observed in the number of small business loans under FN-CB-000.B stems from the redefinition of the segment classification for the relevant loan products as of 2025 and the reclassification of a portion of small business loans into the corporate loans segment. Consequently, this item is not suitable for a direct year-on-year comparison, and the relevant change should be assessed taking into account the reclassification effect.

[4] *FN-CB-000.B Note – Mortgage loans and revolving credit facilities are excluded from the scope of this explanation.*

Metrics and Targets

Sector Specific Guidance Volume 18: Investment Banking and Brokerage

Volume 18 – Sustainability Disclosure Topics and Metrics

Topic	Metric	Category	Unit of Measure	Code	2024	2025
Integration of Environmental, Social, and Governance Factors into Investment Banking and Brokerage Activities	Definition of the approach to incorporating environmental, social and governance (ESG) factors into investment banking and brokerage activities – Deniz Yatırım.	Discus-sion & Analysis	N/A	FN-IB-410a.3	As part of the Group Sustainability Management System, work has begun to roll out the sustainability-related initiatives carried out at Denizbank A.Ş. across the entire Group, based on topics, targets and metrics. In subsequent reporting periods, we will report on the implications of this for each subsidiary where necessary. (e.g. the Deniz Yatırım TSRS reporting process)	As part of the Group Sustainability Management System, work has begun to roll out the sustainability-related initiatives carried out at Denizbank A.Ş. across the entire Group, based on topics, targets and metrics.

Volume 18 – Performance Metrics

Performance Metric	Category	Unit of Measure	Code	Transaction	2024	2025	Change (%)
(a) Brokerage, (b) Advisory and (c) Securitisation transactions: (1) the number and (2) the value[5]	Quantitative	Count, Currency (thousands TL)	FN-IB-000.A	Number of Brokerage Transactions	4	0	-100.00
				Value of Brokerage Transactions	6,844,433	0	-100.00
				Number of Advisory Transactions	1	1	0.00
				Value of Advisory Transactions	9,530	438	-95.40
				Number of Securitisation Transactions	89	27	-69.66
				Value of Securitisation Transactions	20,090,500	8,405,000	-58.16

The 2025 performance metrics showed a marked downward trend across all transaction categories in comparison with 2024. In the brokerage transactions category, there was a 100% decrease in both the number of transactions and the transaction value; this change is attributable to the fact that no brokerage activities were carried out in the relevant segment during 2025. Within the consultancy transactions category, whilst the number of transactions remained stable, a 95.40% decrease in transaction value was observed; this development stems from variations in the size of completed consultancy projects. In securitisation transactions, the number of transactions fell by 69.66% and the transaction value by 58.16%; this decline reflects cyclical conditions in the capital markets, changes in client demand and a contraction in the volume of securities issued. Taken as a whole, the downward trend in Deniz Yatırım's transaction metrics for 2025 reflects a contraction in the volume of business driven by market conditions and a shift in the product mix.

[5] Note to FN-IB-000.A– For syndication transactions, the entity includes only the amount for which it is liable

Metrics and Targets

SASB Index

SASB – Sustainability Disclosure Topics and Metrics

Topic	Metric	Category	Unit of Measure	Code	Disclosure
Data Security	(1) The number of data breaches, (2) the average number of data breaches per person, (3) the number of account holders affected	Quantitative	Number, Percentage (%)	FN-CB-230a.1	(1) 0 (2) 0 (3) 0
	Explanation of the approach to identifying and addressing data security risks	Discussion & Analysis	N/A	FN-CB-30a.2	DenizBank identifies and manages data security risks within the framework of an integrated approach that encompasses information security, operational resilience, third-party risk management, technology procurement, system development and business continuity processes. In identifying risks, the Cybersecurity Maturity Assessment—conducted at regular intervals and based on the NIST Cybersecurity Framework at ENBD Group level—is used as the primary tool. Governance, technological capabilities, operational processes and the level of preparedness against evolving threats are addressed holistically. To mitigate identified risks, multi-layered control mechanisms are implemented across network, application, database, endpoint and physical security levels, alongside corporate policies and procedures covering access, data classification, acceptable use, data retention, sharing and disposal. Based on the assessment findings, risk- and priority-based improvement actions are formulated and regularly monitored by Senior Management; a risk transfer mechanism is operated under the Cyber Security Insurance policy to manage potential financial impacts.

Climate Resilience and Adaptation of Assets

DenizBank has carried out a comprehensive analysis at the customer portfolio level to assess the resilience of its portfolio against climate change-related transition and physical risks. As part of this, customers in the corporate, commercial and SME segments were assessed taking into account the sectors in which they operate, their NACE breakdowns and their geographical locations.

In the analyses conducted regarding climate-related transition risks, customers operating in sectors that may be exposed to carbon pricing mechanisms were taken into account. In this context, customers operating in the aluminium, cement, fertiliser, iron and steel, and electricity sectors, and possessing a carbon-intensive production structure, were assessed as vulnerable assets.

As a result of the analyses carried out, it was determined that the share of the customer portfolio assessed as vulnerable to transition risks within the total loan portfolio stands at approximately 2.91%. In this context, these assets are assessed as being susceptible to increasing cost pressures arising from carbon pricing mechanisms, regulatory developments and the transition to a low-carbon economy.

In the analyses carried out under the heading of physical risks, consideration was given to clients operating in regions where the physical impacts of climate change (particularly water stress) are most pronounced. In this context, clients operating in the agriculture, livestock, food, beverage, metals, manufacturing, textiles and electronics sectors, and located in regions exposed to high levels of water stress, were classified as vulnerable assets.

As a result of the assessments carried out, it was determined that the share of the customer portfolio assessed as vulnerable to physical risks within the total portfolio stands at approximately 14.7%. These assets are considered to be more sensitive to physical climate impacts that could cause disruptions in production processes, lead to cost increases and put pressure on operational continuity.

DenizBank also monitors financing activities that support environmental sustainability in order to capitalise on the opportunities arising from the fight against climate change. In this context, investments in energy efficiency, renewable energy, resource efficiency and sustainable production processes are assessed as climate-resilient assets.

It is estimated that the share of assets classified as climate-aligned within the Parent Company Bank's current portfolio stands at approximately %2 of the total portfolio. It is anticipated that these assets may have a lower risk profile in the long term, as they are aligned with the transition to a low-carbon economy.

As part of this classification process, sector definitions under CBAM, carbon pricing mechanisms and sector-specific emission intensities were taken into account for transition risks. In the assessment of physical risks, the WRI Aqueduct dataset and province-level water stress scores were utilised, whilst the geographical locations where clients operate and sector-specific information were considered together.

The data used in the analyses reflects the current client portfolio as of the 2025 reporting period, and the assessments were carried out in line with scenario analyses and financial impact assessment studies.

Metrics and Targets

Sustainability and Climate-Related Targets

The sustainability targets set by the Group are defined within the framework of an approach that takes environmental and social impacts into account, aims to deliver measurable progress, and supports the integration of sustainability criteria into business decisions. In line with this, the targets focus on priority areas such as the development of sustainable finance, the expansion of inclusive financial services, the empowerment of human capital, and the creation of sustainable value through digital banking solutions. The defined targets are shaped with respect to global climate policies and are addressed within a framework consistent with the Paris Agreement's objective of limiting global temperature rise and Second Nationally Determined Contribution of Türkiye (NDC 3.0) submitted under the United Nations (UN) Framework Convention on Climate Change.

Sustainability and climate-related targets are reviewed annually as part of mandatory reporting requirements under the relevant legislation. This approach aims, on the one hand, to meet investors' sustainability-focused expectations and, on the other, to support the financing of sustainable economic activities.

The set of targets was reviewed during the 2025 reporting period. Targets that could not be measured regularly and consistently, and therefore could not be directly subject to performance monitoring, were removed from the scope. To support more effective monitoring of sustainability performance, new targets (which are clearer, measurable and trackable through metrics) have been included in the target set. The aim of this update is to underpin the target structure with a stronger measurement and monitoring approach, to track progress through concrete indicators, and to make the reporting framework more transparent.

In the field of sustainable finance, the Group is undertaking initiatives aimed at strengthening its sustainable finance strategy. As part of this, the Group aims to draw up a Sustainable Finance (2025–2030) Action Plan. The plan is designed to integrate sustainable finance activities more closely with the corporate strategy and to support the financing of sustainable economic activities. Furthermore, in line with the strategy announced by the ENBD Group, the aim is to increase the Group's share of the sustainable finance resources to be deployed by 2030. This approach is regarded as a key tool for financing the transition to a low-carbon economy and supporting sustainable investments.

Within the framework of its responsible banking approach, the Group has also positioned the development of sustainable finance products and services amongst its objectives. In this regard, work is being carried out to develop new sustainable finance products and to incorporate financing solutions that take environmental and social impacts into account into the product portfolio. This approach supports the diversification of sustainable finance instruments and helps meet investors' sustainability and climate-focused expectations.

DenizBank regards strengthening financial inclusion as one of the key elements of its sustainability strategy. In this context, the aim is to develop financial services targeted at customer segments with limited access to banking services or who do not receive adequate service.

The development of human resources and the promotion of an inclusive approach to leadership are also among the Group's sustainability objectives. In line with this, the aim is to strengthen practices that support diversity and inclusion within the organisation through the design of the Women's Leadership and Development Programme. This programme is designed to support the career development of female employees and enhance their leadership potential.

Digitalisation and innovation are regarded as one of the key areas underpinning the Group's approach to sustainable banking. In this context, the aim is to develop digital banking services via the MobilDeniz platform and other digital channels, and to implement innovative, sustainability-focused initiatives. The aim is to make operational processes more efficient, reduce resource consumption and improve the customer experience through the wider adoption of digital channels.

In addition, a project is planned to be launched to systemically track green and social loans, with the aim of enhancing the traceability of sustainable finance activities. This initiative aims to monitor sustainable finance activities in a more systematic manner and to report data relating to the sustainable finance portfolio more effectively.

The sustainability and climate-related targets set by the Group are reviewed annually and monitored as part of the reporting processes. This approach supports the improvement of sustainability performance over time, whilst also ensuring that stakeholders are provided with transparent and comparable information regarding the Group's sustainable transformation process.

The Group continues its efforts to develop the targets it has set in line with its sustainability strategy and to integrate them into its corporate processes. Accordingly, various targets have been set for 2026 relating to sustainable finance, monitoring climate performance and strengthening the sustainability management infrastructure. Accordingly, the Group aims to set short- and medium-term sustainable finance targets across the Group in order to broaden the scope of its sustainable finance activities. Furthermore, the digitalisation of operational carbon footprint calculation processes within DenizBank's internal systems is scheduled for completion. These initiatives are intended to enable more effective monitoring and management of operational emissions.

Moreover, to enable more effective monitoring of sustainable finance activities, the aim is to implement an information technology infrastructure for the systemic tagging and tracking of green and social loans. This system is intended to facilitate the more systematic monitoring and reporting of data relating to the sustainable finance portfolio.

The Group also plans to develop sector-specific decarbonisation roadmaps for the priority sectors identified under its decarbonisation strategy. These initiatives are expected to contribute to the Parent Company Bank's ability to support its customers during the transition to a low-carbon economy and to manage portfolio-based climate risks more effectively.

The review of policies and procedures within the Sustainability Management System, and the expansion of its scope to cover all subsidiaries within the Group, are also among the objectives aimed at strengthening the sustainability management framework.

DenizBank aims to strengthen its position in the field of sustainable finance by enhancing its visibility and positioning in this area during COP31, which is to be held in Türkiye in 2026.

Metrics and Targets

DenizBank Sustainability and Climate Related Targets

Value Area	No	Disclosure Topics	Unit	Source	2024 Performance	2025 Performance	Progress Status	Target Year
Sustainable Financing	1	Increasing the Group's share of the 1.29 trillion TL (30 billion USD) in funding to be allocated across the ENBD Group by 2030	TL	Internal	-	388 million TL	In Progress	2030
	2	Improving processes for obtaining relevant documentation during allocation procedures from customers participating in the financed emissions account, with a view to enhancing data quality	Deliberation/ Discussion	Internal	-	Increasing the Group's share of the 1.29 trillion TL (30 billion USD) in funding to be allocated across the ENBD Group by 2030 To improve the quality of data in the Parent Company Bank's emissions calculations, priority was given to those customers contributing most significantly to emissions, and work was carried out with 30 companies selected for this purpose. During this process, initial measures were implemented to obtain customer-specific emissions and operational data and to increase the depth of the data.	In Progress	2026
	3	Implementing IT infrastructure for the systematic tagging and tracking of green and social loans.	Deliberation/ Discussion	Internal	The process was initiated.		In Progress	2026
	4	Completion of the Decarbonisation Strategy, aligned with the ENBD Group's net-zero commitments and NDC of Türkiye	Deliberation/ Discussion	Internal	-	By prioritising customers operating in carbon-intensive sectors and exceeding a specific risk threshold, the aim is to collect emissions and related activity data in a regular and systematic manner. In line with this, plans are in place to integrate climate-related data fields into existing customer data collection processes and to systematise these processes.	In Progress	2026
	5	Transferring the operational emissions calculation at the Group level to digital infrastructure systems, whilst simultaneously enhancing calculation quality through data optimisation.	Deliberation/ Discussion	Internal	-	Work on developing the IT infrastructure for the systematic labelling and tracking of green and social loans has been ongoing since 2025, and these initiatives are scheduled for completion in 2026.	In Progress	2026
Transition to Low-Carbon Economy	6	Reducing the Group Scope 1+2 absolute gross emissions by 30% compared to the 2024 base year, in line with the ENBD Group's net-zero commitments*	%	Internal	-	8.1	In Progress	2030
	7	In line with the ENBD Group's net-zero commitments*, a 5% annual reduction in the Group Scope 1+2 absolute gross emissions by 2027, compared to the 2024 base year		Internal	-	8.1	In Progress	2027
	8	To align DenizBank's portfolio with Türkiye's net-zero target by 2053	Deliberation/ Discussion	Internal	-	Studies to develop a Decarbonisation Roadmap in line with the 2053 net-zero targets are ongoing.	In Progress	2053
	9	Completion of the integration of climate risks and opportunities into the Corporate Risk Management system.	Deliberation/ Discussion	Internal	-	Preliminary assessments have been carried out to identify the data areas required for the integration of climate risks and opportunities into credit risk parameters; the project aims to analyse the impact of physical and transition risks on different portfolios and to assess, using model-based approaches, how these impacts affect the probability of default and the loss given default. As such, the plan is to advance methodological work aimed at quantifying these effects.	In Progress	2026
	10	Increasing electricity generation capacity and self-consumption levels through the commissioning of all four planned solar power plants.	Quantity	Internal	-	1	In Progress	2027
Corporate Foundations	11	Ensuring that all locations hold the "Zero Waste Basic Level Certificate"	%	Internal	90	97	In Progress	2026
	12	Rolling out sustainability policies and the DenizBank A.Ş. Sustainability Strategy across the entire the Group and integrating them via the Sustainability Management System to be established in line with the the Group Business Strategy.	Deliberation/ Discussion	Internal	-	Work has begun on updating the Sustainability Management System (SMS) with a view to rolling out sustainability policies across the entire the Group.	In Progress	2027
Next-Gen Banking	13	Becoming a signatory to the WEPs (Women's Empowerment Principles) and the UNEP FI PRB (Principles for Responsible Banking).	Yes/No	Internal	-	Approval has been obtained from senior management to sign the WEPs (Women's Empowerment Principles) and the UNEP FI PRB (Principles for Responsible Banking), and the membership processes are currently underway. It is planned that this process will be completed by 2026.	In Progress	2026
	14	Increasing the digital penetration rate to 84% by 2026	%	Internal	82	83	In Progress	2026

**ENBD Group's Net Zero Commitments have been set for the 2023 base year; however, as Scope 1 and Scope 2 calculations at the Group level will be carried out for the first time in 2024, the base year for the Group target is 2024.*

Appendices

Shape the future with confidence

Convenience Translation of Independent 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 DENİZBANK ANONİM ŞİRKETİ AND ITS SUBSIDIARIES

To the General Assembly of Denizbank Anonim Şirketi,

We have been assigned to perform limited assurance engagement on the information ("Sustainability Information") presented in accordance with the Turkiye Sustainability Reporting Standards 1 "General Requirements for Disclosure of Sustainability-related Financial Information" and Turkiye Sustainability Reporting Standards 2 "Climate-Related Disclosures" of Denizbank Anonim Şirketi and its subsidiaries (collectively referred to as the "Group") for the year ended December 31, 2025.

Our assurance engagement does not include the information related to prior periodsother information (including any images, audio files, website links or embedded videos) associated with Sustainability Information.

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 Group's "2025 TSRS-Aligned Sustainability Report" for the year ended 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 prior periods or other information associated with the Sustainability Information (including any images, audio files, website links or embedded videos).

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.

Other Matters

The limited assurance engagement on the Sustainability Information included in the Group's "2024 TSRS-Aligned Sustainability Report" for the year ended December 31, 2024, was performed by another independent assurance provider, which expressed an unmodified conclusion in its assurance report dated July 10, 2025 on the aforementioned TSRS-Aligned Sustainability Report.

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 Turkiye 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.

Independence and Quality Control

We have complied with the independence and other ethical requirements of the Code of Ethics for Independent Auditors, issued by the POA, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior. 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,

- Face-to-face and online 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 used to review and assess the sustainability related information.
- The disclosure and presentation of sustainability-related information have been evaluated.
- Through inquiries, we obtained an understanding of Group's control environment 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.
- The appropriateness and consistency of the Group's estimation development methods were evaluated. 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.

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

24 July 2026
İstanbul, Türkiye

Appendices

TSRS Compliance Table

Topic	TSRS Article: TSRS 1	TSRS Article: TSRS 2	Report Section
General Provisions	TSRS 1 54	-	About the Report Reporting Standards and Compliance
	TSRS 1 55	-	About the Report Reporting Standards and Compliance
	TSRS 1 56	-	About the Report Reporting Standards and Compliance
	TSRS 1 57	-	Judgements and Measurement Uncertainty
	TSRS 1 58	-	Judgements and Measurement Uncertainty
	TSRS 1 59	-	About the Report Reporting Standards and Compliance
	TSRS 1 60	-	About the Report Reporting Standards and Compliance Information Related to Financial Disclosures Reporting Entity Boundaries and Measurement Approach
	TSRS 1 61	-	About the Report Reporting Standards and Compliance Information Related to Financial Disclosures Reporting Entity Boundaries and Measurement Approach
	TSRS 1 62	-	About the Report Reporting Standards and Compliance
	TSRS 1 63	-	About the Report Reporting Standards and Compliance Reporting Entity Boundaries and Measurement Approach
	TSRS 1 64	-	About the Report Information Related to Financial Disclosures
	TSRS 1 65	-	About the Report Information Related to Financial Disclosures
	TSRS 1 66	-	About the Report Information Related to Financial Disclosures
	TSRS 1 67	-	Changes Compared to the Previous Reporting Period and Reporting Approach
	TSRS 1 68	-	Changes Compared to the Previous Reporting Period and Reporting Approach
	TSRS 1 69	-	Changes Compared To The Previous Period and Reporting Approach
	TSRS 1 70	-	Metrics and Targets
	TSRS 1 71	-	Sustainability and Climate-Related Risks and Opportunities
	TSRS 1 72	-	About the Report Reporting Standards and Compliance
	TSRS 1 73	-	There is no obligation to provide any disclosure.

Topic	TSRS Article: TSRS 1	TSRS Article: TSRS 2	Report Section
Governance	TSRS 1 26	TSRS 2 5	Governance DenizBank Sustainability Governance Structure Duties and Responsibilities of the Board of Directors Committees and Departments Supporting the Board of Directors
	TSRS 1 27	TSRS 2 6	Governance
	-	TSRS 2 7	There is no obligation to provide any disclosure.
Strategy	TSRS 1 28	TSRS 2 8	Sustainability Governance Structure
	TSRS 1 29	TSRS 2 9	Sustainability and Climate-Related Risks and Opportunities
	TSRS 1 30	TSRS 2 10	Sustainability and Climate-Related Risks and Opportunities
	TSRS 1 31	-	Sustainability and Climate-Related Risks and Opportunities
	-	TSRS 2 11	Sustainability and Climate-Related Risks and Opportunities
	-	TSRS 2 12	Sustainability and Climate-Related Risks and Opportunities Sector-Specific and Cross-Sector Metrics
	TSRS 1 32	TSRS 2 13	Sustainability and Climate-Related Risks and Opportunities
	TSRS 1 33	TSRS 2 14	Sustainability and Climate-Related Risks and Opportunities
	TSRS 1 34	TSRS 2 15	Sustainability and Climate-Related Risks and Opportunities
	TSRS 1 35	TSRS 2 16	Sustainability and Climate-Related Risks and Opportunities
	TSRS 1 36	TSRS 2 17	Sustainability and Climate-Related Risks and Opportunities
	TSRS 1 37	TSRS 2 18	Sustainability and Climate-Related Risks and Opportunities
	TSRS 1 38	TSRS 2 19	Sustainability and Climate-Related Risks and Opportunities
	TSRS 1 39	TSRS 2 20	Sustainability and Climate-Related Risks and Opportunities
	TSRS 1 40	TSRS 2 21	Sustainability and Climate-Related Risks and Opportunities
	TSRS 1 41	TSRS 2 22	Climate Resilience and Scenario Analysis
	TSRS 1 42	-	Climate Resilience and Scenario Analysis
	-	TSRS 2 23	Sector-Specific and Cross-Sector Metrics
Risk Management	TSRS 1 43	TSRS 2 24	Risk Management Risk Management Processes Opportunity Management Processes Evaluation of the Impacts of Risks Prioritisation of Risks Monitoring of Risks
	TSRS 1 44	TSRS 2 25	Risk Management Inputs, Parameters and Scope Used in the Processes Evaluation of the Impacts of Risks Prioritisation of Risks Monitoring of Risks Changes Compared to the Previous Reporting Period and Reporting Approach
	-	TSRS 2 26	There is no obligation to provide any disclosure.

Appendices

Topic	TSRS Article		Report Section
	TSRS 1	TSRS 2	
Metrics and Targets	TSRS 1 45	TSRS 2 27	Metrics and Targets
	TSRS 1 46	-	Metrics and Targets Sustainability and Climate-Related Metrics Sustainability and Climate-Related Targets
	-	TSRS 2 28	Metrics and Targets Sustainability and Climate-Related Metrics Sustainability and Climate-Related Targets
	TSRS 1 47	-	There is no obligation to provide any disclosure.
	TSRS 1 48	-	Metrics and Targets Sustainability and Climate-Related Metrics
	TSRS 1 49	-	Metrics and Targets Sustainability and Climate-Related Metrics
	TSRS 1 50	-	Metrics and Targets Sustainability and Climate-Related Metrics
	TSRS 1 51	-	Metrics and Targets Sustainability and Climate-Related Metrics
	TSRS 1 52	-	Metrics and Targets Sustainability and Climate-Related Metrics
	TSRS 1 53	-	Metrics and Targets Sustainability and Climate-Related Metrics
	-	TSRS 2 29	Metrics and Targets Sustainability and Climate-Related Metrics Greenhouse Gas Emissions Sector-Specific and Cross-Sector Metrics
	-	TSRS 2 30	There is no obligation to provide any disclosure.
	-	TSRS 2 31	There is no obligation to provide any disclosure.
	-	TSRS 2 32	Metrics and Targets Sustainability and Climate-Related Metrics
	-	TSRS 2 33	Metrics and Targets Sustainability and Climate-Related Metrics
	-	TSRS 2 34	Metrics and Targets Sustainability and Climate-Related Metrics
	-	TSRS 2 35	Metrics and Targets Sustainability and Climate-Related Metrics
	-	TSRS 2 36	Metrics and Targets Sustainability and Climate-Related Metrics
	-	TSRS 2 37	Metrics and Targets Sustainability and Climate-Related Metrics Sustainability and Climate-Related Targets

Abbreviations

ADB: Asian Development Bank

AR6: The Intergovernmental Panel on Climate Change's Sixth Assessment Report

BRSA: Banking Regulation and Supervision Agency

CAR: Capital Adequacy Ratio

CBAM: Carbon Border Adjustment Mechanism

CEO: Chief Executive Officer

CET1: Common Equity Tier 1 Ratio

CFO: Chief Financial Officer

CMB: Capital Markets Board of Türkiye

COP31: Conference of the Parties

ECSR: Credit Risk Organisation

DFSG: DenizBank Financial Services Group

KSRU: Expertise in Corporate Sustainability Reporting

E&S Assessment: Assessment of Environmental & Social Risks

ESG: Environmental, Social, and Governance

EVP: Executive Vice President

EBRD: European Bank for Reconstruction and Development

ENBD: Emirates National Bank of Dubai

GAR: Green Asset Ratio

GCSO: Group Chief Sustainability Officer

GHG Protocol: Greenhouse Gas Protocol

GRI: Global Reporting Initiative

ICAAP: Internal Capital Adequacy Assessment Process

IEA: International Energy Agency

IEA APS: IEA Announced Pledges Scenario

IEA NZE: IEA Net-Zero Emissions

IFC: International Finance Corporation

IFIs: International Financial Institutions

Appendices

IFRS: International Financial Reporting Standards

IPCC: International Panel on Climate Change

ISSB: International Sustainability Standards Board

IT: Information Technologies

POA: Public Oversight, Accounting and Auditing Standards Authority

SME: Small and Medium-sized Enterprises

NDC 3.0: Nationally Determined Contributions

NGFS: Network for Greening the Financial System

PTB: Pre-Tax Profit

RCP: Representative Concentration Pathways

RMF: DenizBank Risk Management Framework

SASB: Sustainability Accounting Standards Board

SSP: Shared Socioeconomic Pathways

SMS: Sustainability Management Systems

SPP: Solar Power Plant

TCFD: Task Force on Climate-related Financial Disclosure

tCO_2e: Tonnes of Carbon Dioxide Equivalent

TFRS 9: Türkiye Financial Reporting Standards 9 – Financial Instruments

TSRS: Türkiye Sustainability Reporting Standards

TSRS 1: General Requirements for Disclosure of Sustainability-related Financial Information

TSRS 2: Climate Related Disclosures

UN: United Nations

UNEP FI PRB: United Nations Environmental Programme Financial Iniative Principles for Responsible Banking

WEPs: Women's Empowerment Principles

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What is next?
DenizBank
is here.