

SUSTAINABILITY PRINCIPLES COMPLIANCE FRAMEWORK

Communiqué Amending the Corporate Governance Communiqué (the “Communiqué”), has been published in the Official Gazette dated 02.10.2020 and issue no. 31252, and has come into force accordingly, and the “Sustainability Principles” have been incorporated into the legislation for the first time. According to Article 8 of the Communiqué, compliance by the companies, with the sustainability principles are set forth as voluntary; however, they are set forth as a requirement that explanations should be set forth, in the annual reports, regarding whether the basic principles determined within the scope of sustainability principles compliance framework, are complied or not; if not, reasoned explanation in relation thereto; impacts which occur in the management of environmental and social risk management due to failure to comply with called risks fully. In this context, providing information to the public regarding whether the sustainability principles are complied or not, is based on “Comply or Disclose” principle.

Works performed, on global platform, by the United Nations (“OECD”) and at national level, by the Capital Markets Board and the Turkish Capital Markets Association, and on sector basis, by the Banking Regulation and Supervision Agency and the Banks Association of Türkiye, and all other developments, are followed by our Bank constantly.

In this context, detailed analysis studies are carried out for adopting, at our Bank, the “Environmental”, “Social”, “Corporate Governance” which consist of 17 main targets internally, and which is, essentially, based on environmental and social responsibility, together with other targets in relation thereto, and to ensure that they can become permanent. Furthermore, trainings which intend to provide information to, and encourage the employees for the purposes of analysing the efficiency of the Bank’s activities with regards to sustainability principles. Concurrently, process of compliance with the sustainability principles in the long run, is continuing.

ICBC Turkey, acting with the consciousness of observing all stakeholders and interest holders, is focused on its works, targets and policies, with the awareness to reach sustainability targets which have become a corporate culture constantly. Our Bank, in harmony with its strategic targets, adopts international standards and in integration with the ICBC Head Office, it targets to contribute to sustainability on global scale.



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Section	Principles	Compliance Status	Explanation
A - General Principles			
A1	Strategies, Policies and Targets		
A1	The Board of Directors should determine ESG-priority issues, risks and opportunities, and form ESG policies in accordance with them. For the sake of effective implementation of the aforesaid policies, internal directives, work procedures, etc. may be prepared for the corporation. For these policies, a decision of the Board of Directors should be taken and made public.	No	Studies of our Bank within the scope of the ESG policy, are continuing and in this context, Sustainability Management System consulting service has been received. After completion of the Sustainability Management System draft documentation process, opinions and proposals relating to these policies shall be presented to the Board of Directors. Thereby, we aim to target to analys risks and opportunities, announcement be made to the public and the stakeholders, regarding the Bank's procedures, in accordance with established road map.
A1	Should determine a Corporation Strategy in compliance with ESG policies, risks and opportunities, and should determine and publicly disclose its short and long-term goals in line with its ESG policies.	No	A strategy in consistent with the ESG and the risks and opportunities, has not been composed yet. Some Departments evaluate, not according to a written procedure, the companies in the loan processes, within the scope of ESG. After short, medium and long term ESG targets are completed, we are planning to make announcement shall be made to the public.
A2	Implementation/Monitoring		
A2	Should appoint and publicly disclose its committees/units in charge of implementation of ESG policies. Committees/units in charge, should report the activities carried out under the policies to the Board of Directors at least once a year and in any case, within the maximum periods of time stipulated for disclosure of annual reports in the regulations of the Board pertaining thereto.	No	In line with the attitude of our Bank ICBC Head Office, it is planned to establish a committee, which shall report to a top management and which shall take as the basis the activities regarding manner of conducting ESG, and to compose an action plan which shall intended to increase efficiency of workshop group established during the year and thereby, to enhance awareness.
A2	Should formulate and publicly disclose the implementation and action plans in line with the short and long-term goals determined as above.	Partial	In the Annual report, 3 years strategic development planning has been explained. In the 3 years strategic development plans which shall be announced in the future in parallel with the targets of ICBC Head Office, it is projected that ESG scopes shall be considered as well.
A2	Should determine ESG Key Performance Indicators (KPIs) and declare them comparatively on an annual basis. In case of availability of verifiable data, it should present KPIs with local and international sector comparisons.	No	Our process of forming data set for announcement of KPIs within the scope of ESG on the basis of years, and for making sector-based and international comparison analyses; is continuing. There is no KPI which is not announced to public yet.
A2	Should declare innovation activities aimed to improve the sustainability performance in relation with business processes or products and services.	Yes	<p>The Bank, in its “Project Finance” operations, is evaluating the projects which decrease carbon emissions, which prioritise environmentally friendly renewable energy investments, and thereby, putting efforts to increase the share of such transactions in its loan placement. On the other hand, at certain periods meetings are held by attendance of all marketing business lines, and marketing strategies consistent with ICBC Head Office’s green energy policies, are discussed. To support Green Energy financing, competitive prices may be offered to customers who make such investments.</p> <p>It is targeted to enhance awareness of the employees for innovation activities intended to improve sustainability performance. In this context, completion of certification trainings of related personnel and providing them with innovative way of thinking and sustainable perspective, is among the goals with priority.</p> <p>As of the end of November 2021, the “Green Classification” study has been started in accordance with the Head Office’s practices and instructions. All firms with commercial risk are divided into groups for assessment of their risk statuses, and classification has been made accordingly.</p> <p>Although there is no written application instruction for these policies, studies which are being carried out currently, are evaluated also according to project-based demands received from the companies.</p> <p>Our customers are directed to digital applications such as e-account statement, e-signature, e-collateral, and thereby, activities are carried out with the intention to reduce paper consumption. By use of QR code, it is targeted to decrease use of plastic card in the future, by means of innovative products.</p>

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A3	Reporting		
A3	Should report and publicly disclose its sustainability performance, goals and actions at least once a year. Should provide information about its sustainability activities within its annual report.	No	Sustainability Report has not been published yet. Annual Reports are published annually. After its strategic targets, ESG policies and governance structure are defined, the Committee is formed, resolutions of the Board of Directors are taken in accordance with our strategies and they are announced to the public; works for preparations of Sustainability reporting in accordance with international metrics, shall be intensified.
A3	It is essential to ensure that information material for stakeholders to understand and grasp the current position, performance and development of the corporation is shared directly and concisely. It may separately declare detailed information and data on its corporate internet site, and may prepare separate reports directly meeting the needs of different stakeholders.	Yes	https://www.icbc.com.tr/en/investor-relations/accordion-list/Board-of-Directors/311/0/0
A3	It should exercise utmost care in terms of transparency and reliability. As a requirement of balanced approach, it should declare objectively all kinds of developments relating to the priority issues in its statements and reports.	Yes	https://www.icbc.com.tr/en/investor-relations/accordion-list/Board-of-Directors/311/0/0
A3	It should provide information as to with which of the United Nations (UN) 2030 Sustainability Development Goals its activities are related.	Partial	The Bank currently conducts maximum care with regards to compliance with mandatory articles which intend to protect rights of all stakeholders within the scope of the Corporate Governance Principles. The Bank targets to relate its Sustainable Development Targets, with the Bank’s policy in the long run.
A3	It should disclose information about lawsuits filed and/or completed against it in environmental, social and corporate governance issues.	Yes	Within the Corporate Compliance Report, which the CMB requires companies to announce every year, the Bank shares information regarding lawsuits brought against it, lawsuits relating to rights of the employees and work accidents. There is no lawsuit and legal process, which our Bank is party to, with regards to ESG issues.
A4	Verification		
A4	If verified by independent third parties (independent sustainability assurance providers), it should disclose its sustainability performance measures, and should endeavour to increase said verification actions.	No	Our primary purpose in our sustainability business steps, is to make gap analyse of our Bank and to document all our positive perspectives, which currently exist, but not set forth in writing, and to compose a procedure, and thereafter, to draw comprehensive a roadmap, observing interests of all stakeholders. It is targeted to set policy (goal) in consistent with the GRI standards and in compliance with the principles which consist of 17 Main Sustainable Development purposes set by United Nations, and furthermore, to announce, to the public, annual report consistent with these standards. It is planned to make application to GRI in order to prepare our reports in compliance with GRI standards, in the upcoming periods as well.

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B - Environmental Principles			
B1	Should declare its policies and practices, action plans, and environmental management systems (known as ISO 14001 standard) and programs.	No	There is no written policy or implementation regarding environmental management system yet. It is targeted to have a comprehensive program be applied by ad between related Departments and the from, from which we receive services.
B1	It should comply with and declare the laws and other pertinent regulations with respect to the environment.	Partial	As ICBC Turkey, to emphasize our sensitivity regarding environment; sensitivities, regarding environment, of the forms selected at purchasing committees, are included in the scoring in purchasing processes. The Bank, at its scale, acts with good faith and conducts maximum care in compliance with the laws and regulations.
B1	Should disclose limitations to the environmental report that will be prepared under the Sustainability Principles, reporting period, reporting date, data collection process and restrictions in reporting conditions.	No	Since the Sustainability Report has not been published yet, no methodology is applied. Following clarification of the metrics in the upcoming period, it is planned to share detailed information, taking into account the impact of environmental factors.
B1	Should provide information about the most senior director and related committees of the corporation with respect to environment and climate change issues, as well as their duties and functions.	No	Within the scope of Sustainability Management System works, works are continued to set environmental and climate change policies and to establish committee. Within the scope of these works, members included in the workshop group, plan to submit their proposals to top management members, responsible for the Committee.
B1	Should disclose the incentives it offers for management of environmental issues, including the achievement of goals.	No	ICBC Turkey is focused on keeping its employees’ motivation at maximum level and providing necessary environment and means for them to improve their competences. To ensure stability of the employees with high motivation, strong loyalty to their job, social rights and rewards are provided. It targets to implement the principle of “acting carefully to be fair, in order to increase productivity”, set by ICBC Head Office and the Board of Directors. Within the framework of ethical rules, for the purpose of encouraging the employees, it is planned to integrate projects sensitive for the environment, to the rewarding systems.
B1	Should disclose how environmental issues are integrated into business objectives and strategies.	Yes	<p>As ICBC Turkey Bank, taking into account the customer portfolio and target customer group, in particular after 2015, intermediation has been started to be provided for financing of project loans. Each project is evaluated in details by related Departments and the Credit Committees, taking into account the position whether our is the sole financier or participates in a syndication, and especially projects which may give rise to adverse environmental impact and projects, in the EIE (Environmental Impact Evaluation) reports of which there is any deficiency or inconsistency, are handled with more sensitivity. It is avoided to become financier especially for projects which may have adverse environmental impact. In projects, environmental effects of which may conclude adversely, articles which require obtaining EIE reports, are set forth in the loan agreements, as precondition before making available any loan. Situations of any deficiency, problem, cancellation which shall occur subsequently with regards to EIE reports are followed closely and actions are taken quickly, when necessary. Although there is no written policy with regards to evaluation processes; the “List of restricted Companies”, received from the Internal Control and Compliance Department, lists of restricted parties received from the Credit Allocation Department, in which counter-party risks are monitored, and sector analyses of firms with commercial risk and so categorised, received from the Credit and Investment Department, in consistent with ICBC Head Office’s Policies, are evaluated and operations are carried out accordingly.</p> <p>We maintain close working relations, relating to funding transactions which prioritise green finance, with institutions like EBRD (the European Bank for Reconstruction and Development), IFC (International Finance Corporation), which have experience in developing projects within the scope of sustainability.</p> <p>Loans, for which PLM Report (Post Loan Management report) is issued, are followed by our Department, from the commencement of agreement phase of the process until the end of the process, and when required, the situation is followed in coordination with relevant business lines. In projects involving high amounts and/or with multiple participants, audit is conducted for technical and operational processes. Consulting services may also be received in line with the specifications required by a consortium.</p> <p>Furthermore, in line with the Bank’s needs, in purchasing processes, when selecting a supplier firm, priority is given to firms, with sensitive approach to environmental issues.</p>

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B1	Should disclose sustainability performances relating to business processes or products and services, and activities for improvement of said performance.	No	Planning processes intended to conduct the Bank’s business processes in accordance with sustainability and to compose environmentally friendly products, are continuing and since, currently, there is no KPI which assess sustainability performance, studies relating to this matter are continuing.
B1	Should disclose how it manages environmental issues and integrates suppliers and customers into its strategies, not only in terms of direct operations, but also along the corporation value chain.	Partial	In receiving supply services; sensibility to environment, of the companies from which services shall be received, shall be considered as a criteria, by the Bank’s Group of Experts who assess related service.
B1	Should disclose whether it is included in the (sectoral, regional, national and international) policy formulating processes on environmental issues or not, as well as associations it is a member of, its environmental cooperation initiatives entered into with related institutions and non-governmental organizations, and its duties and functions, if any, assumed thereon, and the activities supported by it.	No	Although we do not have a membership to any initiative regarding the environmental policy development process, our evaluation process still continue.
B1	Should periodically report in a comparable manner, information about environmental effects in the light of environmental indicators [Greenhouse gas emissions {Scope-1 (Direct), Scope-2 (Energy indirect), Scope-3 (Other indirect)}11], air quality, energy management, water and waste water management, waste management, biodiversity effects].	Partial	Some of the environmental indicators are irrelevant to the Banking industry, and reports are followed within the Bank, periodically and in comparable manner.
B1	Should disclose details in relation to standards, protocols, methodologies and base year employed for collection and calculation of its data.	Partial	The environmental data preparation methodologies process is continuing and the data relating to last 3 years, are followed within the Bank periodically and in comparable manner.
B1	Should declare the status of environmental indicators for the reporting year in comparison with past years (increase or decrease).	Partial	Increases and decreases in environmental data in the last 3 years, are monitored within the Bank, periodically and in comparative manner. It is projected that details of environmental indicators shall be specified in the Sustainability Report, planned to be published within this year, following application of the policies and methodologies to the Bank’s strategy.
B1	Should determine and disclose short and long-term goals for reduction of its environmental impact. These goals are recommended to be determined in Science-Based manner as advised by the United Nations Climate Change Conference of the Parties. If an improvement is detected in the reporting year over the previously determined goals, it should provide information thereabout.	No	Although the Bank doesn't have any study on SBT(Science Based Target Initiative) yet, development process continues.

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B1	Should disclose its strategy and actions for fight against climate crisis.	Partial	Currently, studies are carried out for classification of environmental impacts in transactions of loan extension (making available loan), and in the future, these studies shall be set forth in the form of written policy, by methodologies in international standards generally accepted, scientific and which intend to prevent counter-party risk. It is targeted to ensure compliance, fully, with the climate combating strategy of ICBC Head Office.
B1	Should disclose its programs or procedures aiming to prevent or minimize the potential negative effects of its products and/or services, and should also declare the actions of third parties aiming to reduce greenhouse gas emissions.	Partial	Each project, for which loan is provided, is evaluated in details by related Departments and the Credit Committees, taking into account whether our Bank is the sole financier or participates in a syndication, and particularly, the projects which may cause adverse environmental effect and the projects, in the EIE (Environmental Impact Evaluation) reports of which there is any deficiency or inconsistency, are handled with more sensitivity. In addition to developing products sensitive to environment, innovative and technology friendly, considering the elements which shall mitigate counter-party risk, covering all stakeholders, cover all work activities of the Bank regarding the subject matter.
B1	Should declare the total number of actions taken, projects implemented and initiatives entered into for reduction of its environmental impact, as well as their environmental benefits and cost savings.	Yes	Within the framework of its work activities intended to avoid adverse environmental effects, there is renewable energy investment, for which financing has been provided by ICBC Turkey until today, in the total amount of 205 mio USD in totally 6 projects, for financing the sectors with low carbon and low emission; and as a result of these investments, it is expected to produce 503,3 MW electricity from green energy resources.
B1	Should report total energy consumption data (with the exception of raw materials), and disclose its energy consumptions as Scope-1 and Scope-2.	No	In 2021, with regards to greenhouse gas emission, vehicles included in Scope-1 have consumed 83,000 LT fuel totally. Our fuel consumption has increased, compared to previous years, due to private vehicles allocated for protecting our employees within the scope of measures against epidemic. Fuel consumption in 2020: 78,000 LT, fuel consumption in 2019: 69,000 LT Our natural gas consumption has decreased by 4,31%, compared to last year. Although there is no calculation of carbon emissions at the moment, but it is planned to be included in the reporting process of the Bank after the relevant metrics are prepared.
B1	Should provide information about electricity, heat, vapour and refrigeration produced and consumed in the reporting year.	Yes	In 2021, our electricity consumption, which realised as 3,788,534 kwh, has decreased by 6,25% compared to 2019.
B1	Should carry out and disclose works on increasing the use of renewable energy sources, and transition to zero or low carbon electricity.	Partial	The Bank, in order to provide active support regarding green finance, carries out studies on its policies, systems and management processes. By the improvements it provides in these fields, it targets to contribute to economic development based on preventing and controlling environmental and social risks. Based on this approach, work activities which are carried out currently to support also renewable energy resources and electrical vehicle investments, will be increased. Study on prioritising renewable energy projects in the loan extension transactions, is continuing, and there is no study we currently make within our Bank, for transition to zero or low carbon electricity.

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B1	Should disclose its renewable energy generation and consumption data.	Irrelevant	The Bank does not generate and use any renewable energy.
B1	Should conduct energy efficiency projects, and disclose the resulting reduction in energy consumption and emission due to its projects.	Yes	As a result of minimisation works we have performed; our natural gas consumption has decreased by 4,31% compared to last year. In 2021, our electricity consumption has decreased by 6,25% compared to 2019.
B1	Should report quantities, sources and procedures of water extracted from underground or ground waters, used, recycled and discharged (Total water extraction on source basis, water sources affected from water extraction, percentage and total volume of recycled and reused water, etc.).	Partial	In 2021, we have had average water consumption of 10,000 m3.
B1	Should disclose whether its operations or activities are included in any carbon pricing system or not (Emission Trade System, Cap & Trade or Carbon Tax).	Irrelevant	Operations and activities are not included in the carbon pricing system.
B1	Should disclose its carbon credit data accumulated or bought in the reporting period.	Irrelevant	Operations and activities are not included in the carbon pricing system.
B1	If carbon pricing is applied in the corporation, it should disclose details relating thereto.	Irrelevant	Carbon pricing is not applied in the partnership (company).
B1	Should disclose all mandatory and voluntary platforms where its environmental data are disclosed.	Partial	According to the Bank’s mission, vision and 3 years strategic development planning; target, policy, governance design relating to “Environmental”, “Social” and “Governance” terms of Sustainability. Following completion of the works, the Bank shall announce to public, on Public Disclosure Platform and on its official web site, its sustainability targets covering its environmental policy as well.

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C - Social Principles			
C1	Human Rights and Employee Rights		
C1	Should establish a Corporate Human Rights and Employee Rights Policy covering its commitment of full compliance with the Universal Declaration of Human Rights, ILO Conventions ratified by Turkey, and legal framework and legislation regulating human rights and labour issues in Turkey. Should disclose the aforesaid policy and the roles played and responsibilities assumed in the implementation of the policy.	Partial	The Bank has no Human Rights Policy, consistent with Corporate Human Rights and Employee Rights Policy; however, it has personnel regulation and code of ethics which has been announced to the public. Code of Ethics: https://www.icbc.com.tr/en/investor-relations/pdf-list/Ethical-Principles/780/3672/0
C1	Should provide equal opportunities in recruitment processes. Includes fair labour, improvement of working standards, employment of women and social inclusion issues (such as non-discrimination towards women, men, religious beliefs, language, race, ethnical origin, age, disablement, refugees, etc.) in its policies by also considering the supply and value chain effects.	Yes	The Bank evaluates equally all candidates who meet the qualifications required for relevant position, the recruitment processes, and offers equal opportunities for candidates. According to our human resources policy, no discrimination is made between our employees based on any reason, all our personnel shall be treated equally. Human Resources Policy: https://www.icbc.com.tr/en/investor-relations/pdf-list/Policies/315/0/0
C1	Should disclose measures taken along the value chain for the sake of supervision and protection of rights/equal opportunities for minorities or certain population segments vulnerable to particular economic, environmental and social factors (low-income segments, women, etc.).	Yes	All policies and implementations of our Bank are prepared in writing, observing the principle of equality and all employees adopt these principles. Human Rights Policy: https://www.icbc.com.tr/en/investor-relations/pdf-list/Policies/315/0/0
C1	Should report developments relating to applications aiming to prevent and correct discrimination, inequality, breaches of human rights and forced labour, and disclose its regulations and measures aiming to prevent employment of child labour.	Yes	In accordance with ICBC Turkey Personnel Regulation and the code of ethics, prepared in accordance with the banking legislation; no child labour may be employed at the Bank and its subsidiaries. Personnel Regulation, article 4, Recruitment (Internally within the Bank)
C1	Should disclose its policies regarding investments in employees (training and development policies), compensations, fringe benefits, unionization rights, work/life balance solutions and talent management. Should determine dispute resolution processes through the establishment of mechanisms for resolution of employee complaints and disputes, and determine its dispute resolution processes. Regularly declares its activities aimed at employee satisfaction.	Yes	The Bank; for the purposes of enhancing practical and theoretical knowledge of the personnel relating to their duties, providing them with the opportunity to gain competences relating to job and preparing them for higher positions; conducts work activities regarding determination of the personnel's training needs, establishing and implementing the training system in relation thereto. In activities carried out in this context and in disputes in relation thereto, rules and policies relating to training/development/compensation/fringe rights of the employees, set forth in writing in ICBC Turkey Personnel Regulation; are applied. For Training-Development Policies; Personnel Regulation (Internal within the Bank) article 8, Career Improvement furthermore Training, Examination, Certificates UT For Compensation; Personnel Regulation (Internal within the Bank) article 11, Leaving the Job Fringe Rights; Personnel Regulation (Internal within the Bank) article 7, Payments and Social Aids

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C1	Should formulate and disclose its occupational health and safety policies. Should disclose actions and measures taken for protection of health and against occupational accidents, and occupational accident statistics.	Yes	<p>Within the scope of Occupational health and safety, by the resolutions taken by the Bank’s Occupational Health and Safety Committee, all measures have been taken in compliance with the Occupational Health Legislation. These resolutions are supported by Occupational Health and Safety trainings (disaster, first aid, fire, etc.) and it is ensured that the personnel gains awareness.</p> <p>No accident at work happened in 2021.</p>
C1	Should formulate and disclose to public its personal data protection and data security policies.	Yes	<p>https://www.icbc.com.tr/en/jppd/detail/LPPD/450/2351/0</p>
C1	Should formulate and disclose its ethics policy (also including business, work ethics, compliance processes, advertising and marketing ethics, public information, etc. initiatives).	Yes	<p>https://www.icbc.com.tr/en/investor-relations/pdf-list/Ethical-Principles/780/3672/0</p>
C1	Should disclose initiatives focused on social investment, social responsibility, financial inclusion and access to finance.	Yes	<p>ICBC applies, actively, five main development concepts, namely “Innovation, Coordination, Green, Opening and Sharing”; and speeds up its efforts in the field of green finance as a significant strategy for making long term commitment with regards to various aspects including policies and systems, governance processes. It improves its policies and governance processes in order to encourage fully construction of green finance, to support development of green industries actively, to fortify prevention and control of environmental and social risks and to improve, constantly, the operations with low carbon which aims at achieving economic development, to provide social and ecological benefits.</p> <p>On the other hand, aid associations, which have been operating in our country for long years, have been searched and they have been contacted, and work activities have been carried out to open account, with the Bank, for associations and foundations, and thereby, to increase collected donations. In this context, initially, accounts have been opened for KAÇUV and the Foundation for Autism.</p> <p>Sign language training has been given by experts, to the employees who work at the branches, and work efforts are continuing to generalise these trainings. ICBC Turkey is aware of importance of equal opportunities in education, and has donated computer to Elazığ Mehmet and Ifakat Gülaçtı School.</p> <p>Within the scope of access to financing and improvement of Turkey-China commercial relations, ICBC Turkey has become the main sponsor of the “Chinese-Turkish Business Development Forum at the 50th Anniversary of China and Turkey Diplomatic Relations”, held in Ankara.</p>
C1	Should organizes information meetings and training programs for employees with respect to ESG policies and applications.	Yes	<p>ICBC Global organises ESG Trainings and training programs in the field of Green Finance, periodically at all its overseas branches. In this context, lately in October, it has organised awareness training which reflects its global perspective relating to Global Trends and practices in China in ESG and Green Finance in the Banking industry.</p> <p>Our credit departments and our staff at the branches, have received “Basic Project Finance” training within the scope of annual “training work targets”, and it is targeted to gain a basic perspective regarding both project loans and renewable energy resources. It is targeted that, thereby, awareness shall be created regarding, particularly, project finance and its environmental impacts in the forthcoming periods, and to have the Bank’s business targets and strategies better understood.</p>

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C2	Stakeholder, International Standards and Initiatives		
C2	Should conduct its activities in sustainability field by taking into consideration the needs and priorities of all stakeholders (employees, customers, suppliers and service providers, public administrations, shareholders, communities and non-governmental organizations, etc.).	Partial	The Bank, within the scope of its works which intend to improve its activities in the field of sustainability, targets to compose a policy taking into account the needs and priorities of all stakeholders.
C2	Should formulate and disclose its customer satisfaction policy dealing with management and resolution of customer complaints.	Yes	Our customers can forward their demands by using our digital channels (our official web site, Write Us form available in our internet – mobile branches, our phone branch) or through official channels. ICBC Turkey evaluates and answers, with utmost case, all messages received from the customers, within the framework of a customer-oriented perspective. The Customer Communication Management Team considers each customer message as an improvement opportunity and identifies the issues which adversely affect customer experience, and detects the root cause, to avoid any repetition of the situation, offers solution proposals and monitors each phase until permanent solution is provided.
C2	Should handle stakeholder communications continuously and transparently, and disclose with which stakeholders, for which purposes, on which issues and in which frequency it communicates, as well as the developments in its sustainability activities.	Yes	On the Bank’s corporate web site, our policy on providing information to the stakeholders, is published. Maximum care is conducted to observe rights of all interest holders and stakeholders. https://www.icbc.com.tr/en/investor-relations/pdf-list/Policies/315/0/0
C2	Should disclose international reporting standards it has adopted [Carbon Disclosure Project (CDP), Global Reporting Initiative (GRI), International Integrated Reporting Council (IIRC), Sustainability Accounting Standards Board (SASB), Task Force on Climate-Related Financial Disclosures (TCFD), etc.].	No	The Main Partnership Bank issues its financial statements in compliance with the “Regulation on Procedures and Principles Regarding Accounting Practices of Banks and Keeping the Documents”, published in the Official Gazette dated 1 November 2006 and issue no.226333, and other regulations issued by the Banking Regulation and Supervision Board relating to banks’ order of accounts and records, and the circular letters and explanations of the Banking Regulation and Supervision Agency (“BRSA”), and for matters regarding which there is no provision in said regulations, in compliance with the “BRSA Accounting and Financial Reporting Legislation”, which contains provisions of the Turkish Financial Reporting Standards (“TFRS”), put into effect by the Public Oversight Accounting and Audit Standards Agency (“POA”). Reporting standards, which are evaluated within the scope of sustainability, they’re planned to be included in the Bank’s independent audit reports in the coming periods.
C2	Should disclose the international organizations or principles it has signed or enrolled in [Equator Principles, United Nations Environmental Program - Financial Initiative (UNEP-FI), United Nations Global Compact (UNGC), United Nations Principles of Responsible Investment (UNPRI), etc.] and the international principles it has adopted [such as International Capital Markets Association (ICMA) Green/Sustainable Bond Principles].	No	The Bank is not a member of any association or organisation within the scope of sustainability.
C2	Should concretely endeavour to be included in the Borsa İstanbul Sustainability Index and international sustainability indices (Dow Jones Sustainability Index, FTSE4Good, MSCI ESG Indices, etc.).	No	ICBC Turkey is not involved in Borsa İstanbul Sustainability Index and international sustainability indices. It is planned to make studies in order to be included in Sustainable Stock Exchange (SSE) Initiative on international platform and in BIST Sustainability Index at national level, after mutual agreement is reached with regards to voluntary public commitment.

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D -	Corporate Governance Principles		
D1	Should exert maximum efforts for compliance with all Corporate Governance principles, apart from the Corporate Governance principles mandatorily required to be complied under and pursuant to the Corporate Governance Communiqué No. II-17.1 of the Capital Markets Board	Yes	2021 Annual (Activities) Report Corporate Compliance Report
D1	Should take into consideration sustainability issues, environmental effects of its activities, and principles pertaining thereto in determination of its corporate governance strategy.	Partial	The Bank shall consider its value creation mission and process in the long run, not only focused to profitability and economic factors, but also the needs of future generations, and it shall continue to make its evaluations within the scope of ESG; it shall better analyse economic factors such as processes of extending loan, social and ecological factors, and shall set forth, in writing potential risks, counter-party risks and opportunities, by setting metrics within the framework of Corporate Sustainability Components.
D1	Should take all of the required measures in order to comply with principles regarding stakeholders and to strengthen communications with stakeholders as stated in the Corporate Governance Principles. Should consult with stakeholders in determination of measures and strategies in sustainability field.	Partial	<p>The Bank’s Policy on Providing Information covers all information relating to providing information to the public, other than the information in the nature of “confidential banking informations” and “confidential business informations”, which falls within the scope of article 73, entitled “Confidentiality”, of the Banking Law, and regarding disclosure of which there is no legal restriction. All interest holders may send their opinions and proposals via the “Write Us” section, available on the Bank’s official web site, and declared opinions shall be examined and considered by related units.</p> <p>Write Us: https://www.icbc.com.tr/en/contact-us/default/Contact-Us/304/1104/0</p> <p>Policy on Providing Information: https://www.icbc.com.tr/en/investor-relations/pdf-list/Policies/315/0/0</p>

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D1	Should endeavour to raise awareness on sustainability and the importance thereof through social responsibility projects, awareness activities and trainings.	Yes	<p>The Bank plans to integrate generally accepted norms and ESG reporting metrics at international scale, in a manner consistent with the Bank’s structure and strategic targets and to handle effects of sustainable transformations, with a perspective of holistic approach. In this context, in the middle of 2021, for the purpose of ensuring an efficient transition to the Bank’s Sustainable Governance System and Reporting process, services have been started to be received from a firm, which has a leading position in its sector. The process has been started actively, in the last quarter of 2021. In this context, following completion of Gap Analysis processes, it is projected to design the Bank’s policy and governance structure, system documentation, establishment of the Committee and announcement of it to the public, commencement of training and reporting processes.</p> <p>Consulting firm which provides services to the Bank, has given awareness training to the Bank’s personnel and has organised awareness trainings reflecting its perspective relating to Global trends and practices in China in ESG and Green Finance in the Banking sector.</p> <p>Additionally, aid associations, which have been operating in our country for long years, have been searched and they have been contacted, and work activities have been carried out to open account, with the Bank, for associations and foundations, and thereby, to increase collected donations. In this context, initially, accounts have been opened for KAÇUV and the Foundation for Autism.</p> <p>Sign language training has been given by experts, to the employees who work at the branches, and work efforts are continuing to generalise these trainings.</p> <p>ICBC Turkey is aware of importance of equal opportunities in education, and has donated computer to Elaziğ Mehmet and Ifakat Gülaçtı School.</p> <p>Within the scope of access to financing and improvement of Turkey-China commercial relations, ICBC Turkey has become the main sponsor of the “Chinese-Turkish Business Development Forum at the 50th Anniversary of China and Turkey Diplomatic Relations”, held in Ankara.</p>
D1	Should endeavour to be a member of and to contribute to works and activities of international standards and initiatives on sustainability.	Yes	<p>The Bank, with regards to compliance with international standards in the field of sustainability, shall continue to benefit from the magnitude, experience and internationally deployed service network of ICBC Head Office.</p> <p>ICBC culture is based on long term and strategic thinking. To be scope of ICBC Head Office opening to Turkey, within the framework of the ICBC Head Office’s goals, ICBC Turkey considers compliance revision of its green loan policy, and applies its diversified loan policy. Planning works relating to implementation of standards such as Global Compact, GRI, Ecuador Principles etc., are continuing.</p>
D1	Should disclose its policies and programs with respect to fight against bribery and corruption and the tax honesty principle.	Yes	<p>The Bank has Conflicts of Interest Policies; and potential conflicts of interest between the employees and customers, and ethical principles required to be complied with, are set forth in called in policy document.</p> <p>In the Bank’s Compliance Policies document, under the title of “Attaching Importance on Combating Against Bribery and Corruption”; it is set forth that importance is attached to ensuring compliance with applicable regulations in the field of combating against bribery and corruption, and that, to prevent use of our Bank in bribery and corruption events, all personnel should conduct necessary attention and care.</p> <p>In the Bank’s Compliance Policies document, under the title of “Integration of Information Systems to the General Banking Regulations”; it is set forth that amendments in the legislation relating to tax, withholding, etc., shall be reflected to the information systems on time, correctly and swiftly, and the Bank’s information systems shall be designed in a manner capable of making such amendments on time.</p> <p>In the trainings regarding Combating Against Laundering Proceeds of Crime and Financing of terrorism; the issue of “Preventing Bribery and Corruption” is explained and it is ensured that awareness of the personnel is increased.</p>