

	<p><i>In case the status of compliance with the principles is indicated as “Yes” or “Partial”, report information regarding information disclosed to public / link should be included.</i></p> <p><i>Explanations regarding the status of compliance with the principle, shall be indicated in the “Remarks” column.</i></p> <p><i>In what context the requested information is presented as consolidated or solo, should be indicated in the “Remarks” column.</i></p>	COMPLIANCE STATUS				REMARKS	REPORT INFORMATION REGARDING INFORMATION DISCLOSED TO PUBLIC (Page number should be indicated as well) / LINK
		YES	NO	PARTIAL	IRRELEVANT		
A. General Principles							
A1. Strategy, Policy and Targets							
	Environmental, social and corporate governance (ESG) issues with priority, risks and opportunities in relation thereto, have been determined by the company’s board of directors.	X					2021 Sustainability Report / Page 30 https://www.kap.org.tr/en/Bildirim/1090754
A1.1	ESG policies (for instance; Environmental Policy, Energy Policy, Human Rights and Employee Policy etc.) have been composed by the company’s board of directors, and have been announced to the public accordingly.			X		<p>The Bank’s “Sustainability Policy” which is a framework on principles regarding protection of the environment, human rights, social welfare and good governance; has been published publicly. In addition to this, the Human Resources Policy, Principles on Banking Ethics, Remuneration Policy, Disclosure Policy, Donation and Aid Policy are available on the Bank’s corporate web site. The Bank’s Personnel Regulation is applied Internally, however has not been announced to public.</p>	<p>https://www.icbc.com.tr/en/investor-relations/pdf-list/Policies/315/0/0</p> <p>https://www.icbc.com.tr/en/investor-relations/pdf-list/Sustainability-Policy/1824/4833/0</p>
A1.2	Short and long term targets set within the scope of the ESG policies, have been announced to public.		X			Strategies in line with the ESG and the risks and opportunities, have not been set yet; however, they are planned to be set in the Sustainability	

						Committee which we have established. After short, mid and long term ESG targets are completed, it is intended make an announcement to the public.	
A2. Implementation / Tracing							
A2.1	Committees and/or units in charge of conducting the ESG policies and the highest ranking officers in relation to ESG matters at the Company, and their duties, have been set and announced to the public.	X					https://www.icbc.com.tr/en/investor-relations/pdf-list/Committee-Structure/1823/4832/0
	Activities carried out by responsible committee and/or unit, within the scope of the policies, have been reported to the board of directors, at least once a year.		X			Due to management changes in 2023, the Sustainability Committee could not hold a meeting.	
A2.2	Implementation and action plans have been composed in line with the ESG targets, and they have been announced to the public accordingly.			X		Strategic development plans which shall be announced in the future, in parallel with the targets of ICBC Group, it is projected to describe the ESG content as well. Furthermore, at the Sustainability Committee that has been established, it is planned to conduct the works intended to set the ESG strategies and targets, to compose the action plans.	https://www.kap.org.tr/en/Bildirim/1090745
A2.3	ESG Key Performance Indicators (KPI) and the level of achieving said indicators on yearly basis; have been announced to public.	X					2023 Annual Report / Sustainability
A2.4	Activities intended to improve sustainability performance with regards to business processes or products and services, have been disclosed to public.	X					2023 Annual Report / Sustainability
A3. Reporting							
A3.1	In the annual reports, information regarding the company's sustainability performance, targets and actions, has been given comprehensibly, correctly and adequately.			X		In the strategic development plans which shall be announced in the future in parallel with the targets of ICBC Group, ESG contents are also planned to be described.	2023 Annual Report / Sustainability

A3.2	The company has disclosed public the information on the goals among the United Nations (UN) 2030 Sustainable Development Goals that are related to the company's operations.	X					2023 Annual Report / Sustainability 2021 Sustainability Report / Page 34
A3.3	Lawsuits which have been commenced and/or finalised regarding ESG matters, which are of significant nature with regards to ESG policies and/or which shall significantly affect the operations; have been disclosed to the public.	X				There is no lawsuit in the reporting period.	2023 Annual Report / Other Issues
A4. Verification							
A4.1	The company's ESG Key Performance assessments have been verified by independent third party and have been disclosed to public accordingly.		X			For ESG Key Performance assessments, verification service is not received from independent third parties.	
B. Environmental Principles							
B1	The company has announced, to public, its policies and practices, action plans in the field of environmental management, its environmental management systems (known by ISO 14001 standard) and programs.		X			Since the system documentation process is continuing.	
B2	When giving the information relating to environmental management; with regards to the environmental reports prepared, scope of the report, reporting period, reporting date, restrictions regarding reporting conditions, have been disclosed to the public.	X					2023 Annual Report / Contact Information
B3	Given in A2.1.	X					
B4	Environmental goals included in the rewarding criteria within the scope of the performance incentive systems on the basis of stakeholders (such as members of the Board of Directors, managers and employees), have been disclosed to the public.		X			There is no criterion that is currently applied or that has been disclosed to the public. At the Sustainability Committee that has been established, it is planned to conduct the works intended to set the ESG strategies and targets, to compose the action plans.	
B5	How the prioritized environmental issues are integrated into business objectives and strategies has been disclosed to the public.	X				As ICBC Turkey Bank, taking into consideration the customer portfolio and that target potential customer group, particularly after 2015, intermediation has been started to be provided for financing of project	

					<p>credits. Each project is evaluated in details by related Departments and the Credit Committees, taking into consideration whether our Bank is the sole financier or participates in a syndication, and particularly the projects which may cause an adverse environmental effect, and the projects, in the EIE (<i>Environmental Impact Evaluation</i>) reports of which there are incomplete or adverse aspects, are handled with more sensitivity. It is abstained to be a financier, particularly for projects which may have adverse environmental effect. In the projects, which may have adverse environmental effects consequently, articles that require provision of positive EIE reports, are stipulated in the credit agreements, as a precondition before disbursement of the credit. Any deficiency, adversity, cancellation situations which may occur in the EIE Reports subsequently, are followed closely, and when required, actions are taken quickly. There is no written policy regarding evaluation processes, however the "List of Restricted Companies", received from the Internal Control</p>	
--	--	--	--	--	--	--

					<p>and Compliance Department, limited lists received from the Credit Allocation Department, by which counterparty risks are considered, and industry analyses of the firms which have commercial risk and are categorised so, received from the Credit and Investment Management Department in line with the Policies of ICBC Head Office, are evaluated.</p> <p>We maintain a close business relation, with regards to fund transactions prioritising green finance, with the institutions such as EBRD (European Bank for Reconstruction and Development), IFC (International Finance Corporation).</p> <p>Credits for which PLM Report (<i>Post Loan Management Report</i>) is prepared, are traced by our business units beginning from the start of agreement phase, until expiry of the process, and when required, the situation shall be traced in coordination with related business lines. In the projects involving huge amounts or multiple participants, supervision is conducted for technical and operational processes.</p>	
--	--	--	--	--	---	--

					<p>Regarding specifications which are required by a consortium, consulting services can also be received.</p> <p>The Bank, attaching importance to integrating efficient use of resources into its corporate culture; encourages its employees fervently to adopt it as a principle that they conduct their operations with an environmentally friendly approach, observing energy saving, and to avoid squandering and waste.</p> <p>Furthermore, when selecting a supplier firm in the procurement processes in accordance with the Bank's needs, priority is given to the firms which are sensitive to the environment.</p>	
B6	Given in A2.4.	X				
B7	It has been disclosed to the public how environmental issues are managed in a manner covering the suppliers and customers during the company's value chain including the operation process, how they are integrated into the business targets and strategies.	X				2021 Sustainability Report/ Page 38-39 , 42
B8	It has been disclosed to the public whether the policy composing processes of related institutions and non-governmental organisations relating to environment, are participated in; and the cooperation processes conducted jointly with such institutions and organisations.		X			The Bank continues its processes for setting its policies and targets. In this context, no cooperation has been made with any institution during the reporting period, and no process has been participated in.

B9	Information environmental impacts in light of the environmental indicators (green gas emissions (Scope-1 (Direct), Scope-2 (Energy indirect), Scope 3 (Other indirect), air quality, energy management, water and waste water management, waste management, biodiversity effects); is disclosed to the public periodically, in a comparative manner.			X		Our efforts for monitoring systems continues, and currently only the consumption data of the Headquarters building is shared.	2023 Annual Report / Sustainability
B10	Details on standards, protocols, methodology and basis year, used to collect and calculate the data, have been disclosed to the public.		X			Efforts for system installation, are continuing.	
B11	Increase or decrease in the environmental indicators for the report year, in comparison with the previous years, has been disclosed to the public.			X		Our efforts for monitoring systems continues, and currently only the consumption data of the Headquarters building is shared.	2023 Annual Report / Sustainability
B12	Short and long term goals have been set in order to mitigate environmental impacts, and development status according to these goals and the goals set in the previous years, has been disclosed to the public.		X			It is planned to set the ESG targets in parallel with the targets of ICBC Group and the decisions to be taken at the Sustainability Committee.	
B13	Strategy for combatting against climate crisis has been composed and planned actions have been announced to the public.		X			It is planned to consider also the ESG contents in the strategic development plans which shall be announced in the future in parallel with the Head Office's targets.	
B14	For the purposes of eliminating potential adverse effects of the products and/or services on the environment or to minimize those effects; programs or procedures have been composed and they have been announced to the public.			X		Articles intended to avoid adverse effects are set forth in the Bank's Sustainability Policy, and studies for composing a procedure relating to this matter, are continuing.	https://www.icbc.com.tr/en/investor-relations/pdf-list/Sustainability-Policy/1824/4833/0 2023 Annual Report / Sustainability
	Actions have been taken with the intention to reduce green gas emission quantities of third parties (for instance supplier, sub-contractor, dealer, etc.) and these actions have been disclosed to the public.		X			In its procurement processes, the Bank takes into account certain criteria such as the ISO standards met by the suppliers, foodstuff codex, environmental management system, environmental consciousness and LEED certificates. And has not	2021 Sustainability Report / Page 42

						taken any action with the intention to reduce third parties' emission quantities yet.	
B15	Environmental benefit/yield and cost savings provided by initiatives and projects intended to mitigate environmental effects, have been disclosed to the public.	X					2023 Annual Report / Sustainability
B16	Energy consumption (natural gas, diesel, gasoline, LPG, coal, electricity, heating, cooling etc.) data have been disclosed, as Scope-1 and Scope-2, to the public.			X		Our efforts for monitoring systems continues, and currently only the consumption data of the Headquarters building is shared.	2023 Annual Report / Sustainability
B17	Disclosure has been made to the public regarding electricity, heat, vapour and cooling generated in the reporting year.		X			There is no production made.	
B18	Studies have been made regarding increasing use of renewable energy, transition to zero or low carbon electricity, and they have been disclosed to the public.		X			Currently, purchase of renewable energy is not made.	
B19	Data on production and use of renewable energy, has been disclosed to the public.		X			Currently, purchase of renewable energy is not made.	
B20	Energy efficiency projects have been made and the decrease in the energy consumption and emission quantity achieved by means of the energy efficiency projects, have been disclosed to the public.		X			Currently there is no ongoing project on energy efficiency.	
B21	Water consumption, quantities of water drawn from underground or above-ground sources, recycled and discharged, sources and procedures thereof, have been disclosed to the public.			X		Our efforts for monitoring systems continues, and currently only the consumption data of the Headquarters building is shared.	2023 Annual Report / Sustainability
B22	It has been disclosed to the public whether the operations or the activities are included in any carbon pricing system (Emission Trade System, Cap & Trade or Carbon Tax).		X			Our operations and activities are not included in any carbon pricing system.	
B23	Information on carbon credit accumulated or purchased during the reporting period, has been disclosed to the public.				X	No carbon credit has been taken in the reporting period.	
B24	If carbon pricing is applied within the scope of the company, its details have been disclosed to the public.				X	No carbon credit has been taken in the reporting period. Carbon pricing is not applied.	

B25	Platforms, on which the environmental information regarding the company is disclosed; have been disclosed to the public.	X				The Bank discloses its environmental information on the Public Disclosure Platform (PDP) and on the Bank's corporate web site.	https://www.icbc.com.tr/en/investor-relations/pdf-list/Sustainability-Policy/1824/4833/0
C. Social Principles							
C1. Human Rights and Employee Rights							
C1.1	The Corporate Human Rights and Employee Rights Policy has been composed, covering the Universal Declaration on Human Rights, ILO Conventions adopted by Türkiye and other related legislation; persons responsible in relation to implementation of the policy, have been designated and the policy and responsible persons have been disclosed to the public.			X		In the Bank's Personnel Regulation, related issues are described, and related document is available internally.	https://www.icbc.com.tr/en/investor-relations/pdf-list/Ethical-Principles/780/3672/0 https://www.icbc.com.tr/en/investor-relations/pdf-list/Policies/315/0/0 2023 Annual Report / Human Resources Practices
C1.2	Taking into consideration also the supply and value chain effects, matters of fair workforce, improvement of working conditions, employment of women and comprehensiveness (no discrimination made on the basis of various factors such as gender, race, religion, language, marital status, ethnic identity, sexual orientation, sexual identity, family responsibilities, trade union activities, political opinion, disability status, social and cultural differences etc.) are described in the policy on employee rights.			X		In the Bank's Personnel Regulation, related issues are described, and related document is available internally. In our sustainability policy, disclosed to the public, articles relating to the matter are set forth.	https://www.icbc.com.tr/en/investor-relations/pdf-list/Sustainability-Policy/1824/4833/0
C1.3	Measures taken during the value chain with the intention to favour social groups sensitive to certain economic, environmental, social factors (social groups with low income, women, etc.) or minority rights/equal opportunities; have been disclosed to the public.			X		In the Sustainability Policy, related issues are described; however, the measures taken in said matters, are not explained.	https://www.icbc.com.tr/en/investor-relations/pdf-list/Sustainability-Policy/1824/4833/0
C1.4	Improvements relating to practices intended to prevent and correct discrimination, inequality, human rights violations, forced labour and child labour; have been disclosed to the public.	X					2021 Sustainability Report / Page 24-28 , 26-28, 42
C1.5	Investment made in the employees (training, improvement policies), compensation, provided fringe rights, right of participating in a trade union, work/life balance solutions and talent management issues are explained in the policy relating to the employee rights.	X				Related issues are explained in the Bank's Personnel Regulation, and the document is available internally. Furthermore, every year, Human Rights Practices are explained in the Annual Report.	2023 Annual Report / Human Resources Practices

	Mechanisms have been established for resolution of employees' complaints and disputes, and the dispute resolution processes have been defined.	X				Employees report their complaints and disagreements to their directors first, and when it is not possible to inform their directors, the Human Resources Department Recruitment and Talent Management Unit or the Internal Audit Department without delay. The incidents that are the subject of the complaint are investigated in a confidential manner and necessary disciplinary penalties are imposed on those responsible when necessary. Furthermore, there is a hotline where ethical violations and suspicious events detected or witnessed in the Bank regarding ethics and compliance can be directly reported. In this context, people who want to make a notification can send the issue to the address of ihbar@icbc.com.tr by e-mail.	2021 Sustainability Report / Page 26-27
	Activities carried out during the reporting period, for ensuring the employees' satisfaction, have been disclosed to the public.	X					2023 Annual Report / Human Resources Practices
C1.6	Occupational health and safety policies have been prepared and disclosed to the public.			X		The Bank's OHS Policies are available internally, and the OHS activities are explained in the periodic reports.	2023 Annual Report / Human Resources Practices
	Measures taken for preventing accidents at work and protecting health, and accident statistics, have been disclosed to the public.	X				Within the scope of occupational health and safety, all measures have been taken in accordance	2023 Annual Report / Human Resources Practices

						with the decisions taken by the Bank's Occupational Health and Safety Committee and also, the Legislation on Occupational Health. These decisions are supported by the Occupational Health and Safety trainings (Natural Disaster, First Aid, Fire, etc.), and the personnel is ensured to be conscious in this matter. No accident has happened at work, in 2023.	
C1.7	Protection of personal data and data security policies have been prepared and disclosed to the public.	X					https://www.icbc.com.tr/en/lppd/detail/LPPD/450/2351/0
C1.8	Ethics policy has been prepared and disclosed to the public.	X					https://www.icbc.com.tr/en/investor-relations/pdf-list/Ethical-Principles/780/3672/0 2021 Sustainability Report / Page 26-28
C1.9	Studies within the scope of social investment, social responsibility, financial inclusion and access to finance are explained.	X					2023 Annual Report / Donations and Social Responsibility 2023 Annual Report / Sustainability
C1.10	Information meetings and training programs regarding ESG policies and practices, have been organised for the employees.	X					2023 Annual Report / Sustainability
C2. Stakeholders, International Standards and Initiatives							
C2.1	The customer satisfaction policy regarding management and resolution of complaints by customers, has been prepared and disclosed to the public.			X		Although there is no publicly available policy, information on the complaints by customers, has been shared in 2023 Annual Report.	2023 Annual Report / Sustainability
C2.2	Information on communication maintained with the stakeholders (which stakeholder, subject and frequency), has been disclosed to the public.	X					2023 Annual Report / Sustainability
C2.3	Adopted international reporting standards are explained in the reporting processes.	X					2021 Sustainability Report / Page 4 2023 Annual Report / Sustainability
C2.4	Principles adopted relating to sustainability, international organisations, committees of which the Bank is a signatory or member, and the principles; have been disclosed to public.			X		ICBC Turkey has no membership. The Bank manages environmental and social adverse effects in light of the international	https://www.icbc.com.tr/en/investor-relations/pdf-list/Sustainability-Policy/1824/4833/0

						sustainability principles and ICBC Green Classification approach, and conducts its reporting processes in compliance with the GRI Standards.	
C2.5	Developments have been made, studies have been conducted in order to be included in the sustainability indices of Borsa İstanbul and/or international index providers.		X			The Bank continues to work on the formation of its sustainability strategy and system creation.	
D. Corporate Governance Principles							
D1	Opinions of the stakeholders have been taken in order to determine the measures and the strategies in the field of sustainability.				X	In 2021 Sustainability Report Materiality analysis study has been made. In this context, at the first phase, opinions of internal stakeholders have been taken, and it is planned to include also the external stakeholders in the future.	2021 Sustainability Report / Page 30-31
D2	Activities have been carried out with the intention to increase awareness regarding the matter of sustainability and significance thereof, by the social responsibility projects, awareness events and trainings.	X				In addition to support provided for various social responsibility projects, the Bank puts efforts to increase awareness by offering its employees many trainings on the matter of sustainability, within the scope of ICBC Academy, which is its training platform.	2023 Annual Report / Donations and Social Responsibility Projects 2023 Annual Report / Sustainability