

	<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	PARTIAL	NO	IRRELEVANT		
	A. General Principles						
	A1. Strategy, Policy and Targets						
A1.1	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					2024 TSRS Compliant Sustainability Report https://www.kap.org.tr/en/Bildirim/1509373
	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			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	https://www.icbc.com.tr/en/investor-relations/pdf-list/Policies/315/0/0 https://www.icbc.com.tr/en/investor-relations/pdf-list/Sustainability-Policy/1824/4833/0

						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.	
A1.2	Short and long term targets set within the scope of the ESG policies, have been announced to public.			X		No targets have been set.	
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
A2.1	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		Reports published during the year were submitted for the Board of Directors' approval; however, no reporting was conducted regarding the policies.	
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		No action plan has been established.	

A2.3	ESG Key Performance Indicators (KPI) and the level of achieving said indicators on yearly basis; have been announced to public.		X			In the 2024 TSRS Report, climate metrics are presented for a single year as it is the initial reporting period; however, a two-year comparative analysis will be available in the 2025 report.	2024 TSRS Compliant Sustainability Report https://www.kap.org.tr/en/Bildirim/1509373
A2.4	Activities intended to improve sustainability performance with regards to business processes or products and services, have been disclosed to public.			X		The 2025 data will be disclosed in the TSRS-compliant sustainability report to be published during the year.	2024 TSRS Compliant Sustainability Report https://www.kap.org.tr/tr/Bildirim/1509373
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			Related details are shared in the Sustainability Report; additionally, 2025 figures will be announced in the TSRS-aligned sustainability report scheduled for release later this year.	2024 TSRS Compliant Sustainability Report https://www.kap.org.tr/tr/Bildirim/1509373
A3.2	The company has disclosed to public the information on the goals among the United Nations (UN) 2030 Sustainable Development Goals that are related to the company's operations.			X		SDG mapping was not conducted in 2025.	
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	X				There is no lawsuit in the reporting period.	2025 Annual Report / Other Issues

	significantly affect the operations; have been disclosed to the public.						
	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				The 2025 data will be disclosed in the TSRS-compliant sustainability report to be published during the year.	2024 TSRS Compliant Sustainability Report https://www.kap.org.tr/tr/Bildirim/1509373
	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		No such policies or systems have been established.	
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		None exist.	
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		No incentive system regarding ESG criteria has been established.	2024 TSRS Compliant Sustainability Report https://www.kap.org.tr/tr/Bildirim/1509373

B5	How the prioritized environmental issues are integrated into business objectives and strategies has been disclosed to the public.	X					2024 TSRS Compliant Sustainability Report https://www.kap.org.tr/Bildirim/1509373
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			The 2025 data will be disclosed in the TSRS-compliant sustainability report to be published during the year.	2024 TSRS Compliant Sustainability Report https://www.kap.org.tr/Bildirim/1509373
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	No collaborations have been established.	
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				The 2025 data will be disclosed in the TSRS-compliant sustainability report to be published during the year.	2024 TSRS Compliant Sustainability Report https://www.kap.org.tr/Bildirim/1509373

B10	Details on standards, protocols, methodology and basis year, used to collect and calculate the data, have been disclosed to the public.	X				The 2025 data will be disclosed in the TSRS-compliant sustainability report to be published during the year.	2024 TSRS Compliant Sustainability Report https://www.kap.org.tr/tr/Bildirim/1509373
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		The 2025 data will be disclosed on a comparative basis with 2024 figures in the TSRS-compliant sustainability report to be published during the year.	2024 TSRS Compliant Sustainability Report https://www.kap.org.tr/tr/Bildirim/1509373
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		No targets have been identified.	
B13	Strategy for combatting against climate crisis has been composed and planned actions have been announced to the public.			X		No action plan has been established.	
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		Provisions for preventing negative impacts are included in the Bank's Sustainability Policy, and no separate procedure exists for this subject.	
	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			X		Criteria such as ISO standards, environmental management systems, and LEED certifications are taken into account during the Bank's	

	have been disclosed to the public.					procurement processes, though no specific action has been taken to reduce third-party emissions at this stage.	
B15	Environmental benefit/yield and cost savings provided by initiatives and projects intended to mitigate environmental effects, have been disclosed to the public.			X		Has not been published.	
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				The 2025 data will be disclosed in the TSRS-compliant sustainability report to be published during the year.	2024 TSRS Compliant Sustainability Report https://www.kap.org.tr/tr/Bildirim/1509373
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				X	Currently there is no ongoing project on energy efficiency.	

	projects, have been disclosed to the public.						
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		Has not been published.	
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		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 2025 Annual Report / Human Resources Practices

	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.						
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			The relevant issues are addressed in the Sustainability Policy; however, the specific measures taken regarding these matters have not been disclosed	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,	X					2021 Sustainability Report / Page 24-28 , 26-28, 42

	human rights violations, forced labour and child labour; have been disclosed to the public.						
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.	2025 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	2021 Sustainability Report / Page 26-27

						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.	
	Activities carried out during the reporting period, for ensuring the employees' satisfaction, have been disclosed to the public.	X					2025 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.	2025 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 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	2025 Annual Report / Human Resources Practices

						personnel is ensured to be conscious in this matter. No accident has happened at work, in 2025.	
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					2025 Annual Report / 2025 Activities
C1.10	Information meetings and training programs regarding ESG policies and practices, have been organised for the employees.	X				Along with the courses offered on our digital training platform, we conducted 'Environmental and Social Risk Management in Lending Processes' training sessions for our branches and marketing units during the year.	
	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			While there is no publicly available policy, information regarding customer complaints is shared in the Annual Report.	2025 Annual Report / Digital Banking
C2.2	Information on communication maintained with the	X					2021 Sustainability Report / Page 40-41

	stakeholders (which stakeholder, subject and frequency), has been disclosed to the public.						
C2.3	Adopted international reporting standards are explained in the reporting processes.	X				The 2025 data will be disclosed in the TSRS-compliant sustainability report to be published during the year.	2024 TSRS Compliant Sustainability Report https://www.kap.org.tr/tr/Bildirim/1509373
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				The 2025 data will be disclosed in the TSRS-compliant sustainability report to be published during the year.	2024 TSRS Compliant Sustainability Report https://www.kap.org.tr/tr/Bildirim/1509373
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		No studies have been conducted.	
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		No studies have been conducted.	
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			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.	