

**ICBC TURKEY BANK A.Ş.  
SUPPLY CHAIN COMPLIANCE REPORT  
FOR THE PERIOD  
01.01.2025 – 31.12.2025**

**Report Date: 18.02.2026**

ICBC TURKEY BANK A.Ş.  
SUPPLY CHAIN COMPLIANCE REPORT

Commercial Title :

ICBC TURKEY BANK A.Ş.

Reported Calendar Year:

2025

Reporting Period:

01.01.2025 –31.12.2025

Report Date:

18.02.2026

Summary of Activities During the Period:

In the reporting calendar year (within the period 01.01.2025 – 31.12.2025), ICBC Turkey Bank A.Ş. The transaction of standard or non-standard precious metals transactions did not take place at the Company. On the basis of Headquarters and Branches, physical precious metal purchases and sales, imports, etc. there is no process.

Declaration of Conformity to the Five-Step Approach:

**Step I: Establishing Strong Company Management Systems**

It is stated that the purpose of the first step is to determine the current situation of the companies in the precious metals supply chain, to determine the level of compliance with the responsible supply chain and to ensure that the management systems are structured in a way that allows for an effective compliance level determination. Since there was no activity within the precious metal supply chain during the reporting calendar year, a “Yes” statement is made as the final declaration.

**Step II: Identifying and Evaluating Risks in the Supply Chain**

It is stated that Step 2 aims to identify and assess the risks associated with the extraction, collection, trade, transportation and export activities of precious metals in conflict-affected and high-risk areas. The precious metals are not included in the supply chain and there are no precious metals purchased. Since there is no activity or transaction within the scope specified in this step during the reporting calendar year, a “Yes” notification is made as a final declaration.

**Step III: Designing and Implementing a Response Strategy to Identified Risks**

Since step 3 aims to assess and respond to the identified risks in order to prevent or mitigate adverse impacts, obliged companies can act together to fulfill the recommendations in this step, however, the responsibility of determining the level of compliance of the current state of the

responsible supply chains remains with the companies themselves. It is stated that it is necessary to make sure that the situations specific to the obliged companies are taken into account in the studies carried out by Since the precious metals specified in this step are not included in the supply chain during the reporting calendar year and there is no risk to be determined, a “Yes” statement is made as the final declaration.

**Step IV: Inspection by Independent Third Parties of the Implementations of Determining the Compliance Level of the Current State of the Supply Chain of the Obligated (Independent Assurance Report)**

It is stated that Step 4 aims to provide an independent third party audit of the work of obligors to determine the level of compliance of the responsible supply chain for precious metals from conflict-affected and high-risk regions, and to support them in developing these studies through various means, including institutionalized mechanisms or industry programmes. Since a contract is signed with an independent audit firm for the auditing by Independent Third Parties and preparing an Independent Assurance Report within the reporting calendar year, a "Yes" statement is made as the final declaration.

**Step V: Annual Reporting of Studies for Determining the Level of Compliance of the Current Status of the Supply Chain**

It is stated that step 5 aims to inform the public about the work to determine the level of compliance of the current situation of the responsible supply chain for precious metals from conflict-affected and high-risk regions in order to establish public confidence regarding the measures taken by the companies. Since the precious metals specified in this step are not included in the supply chain during the reporting calendar year, a "Yes" statement is made as the final declaration.

**MANAGEMENT STATEMENT**

ICBC Turkey Bank A.Ş. As part of the Supply Chain Compliance Report, in 2025, standard or non-standard precious metals transactions at the bank and physical precious metal purchase-sale, import, etc., on the basis of Headquarters and Branches. operation did not occur. As a declaration of conformity with the five-step approach, a “Yes” notification is made for each step, “because there is no transaction within the supply chain”.

Çetin ÇAKMAK

ICBC Turkey Bank A.Ş.

Internal Control and Supply Chain Compliance Officer