

**TÜRKİYE KALKINMA VE YATIRIM  
BANKASI A.Ş.  
AND ITS SUBSIDIARIES**

**Consolidated Financial Statements  
As at and for the Year Ended  
31 December 2021  
With Independent Auditors' Report**

**Türkiye Kalkınma ve Yatırım Bankası Anonim Şirketi and Its Subsidiaries**

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## INDEPENDENT AUDITORS' REPORT

To the Shareholders of Türkiye Kalkınma ve Yatırım Bankası A.Ş.

### Qualified Opinion

We have audited the consolidated financial statements of Türkiye Kalkınma ve Yatırım Bankası A.Ş. (the "Bank") and its subsidiaries (together referred to as "the Group"), which comprise the consolidated statement of financial position as at 31 December 2021, the consolidated statement of profit or loss, the consolidated statement of other comprehensive income, consolidated statement of changes in equity and consolidated statement of cash flows for the year then ended, and the notes to the consolidated financial statements, including a summary of significant accounting policies.

In our opinion, except for the effects of the matter described in the Basis for Qualified Opinion section of our report, the accompanying consolidated financial statements present fairly, in all material respects, the consolidated financial position of the Group as at 31 December 2021, and its consolidated financial performance and its consolidated cash flows for the year then ended in accordance with International Financial Reporting Standards ("IFRS").

### Basis for Qualified Opinion

The Bank's investment in Maksan Malatya Makina Sanayi A.Ş. ("Maksan"), the associate accounted for by the equity method, is carried at TRY 14,571 Thousand on the consolidated statement of financial position as at 31 December 2021, and the Bank's share of Maksan's net income of TRY 4,390 Thousand, are included in Bank's income for the period then ended. We were unable to obtain sufficient appropriate evidence about the carrying amount of the Bank's investment in Maksan as at 31 December 2021 and the Bank's share of Maksan's net income for the period because we were denied access to the financial information, management, and the auditors of Maksan. Additionally, we were unable to obtain the audited financial information of Arıcak Turizm ve Ticaret A.Ş. ("Arıcak"), a subsidiary of the Bank, which is consolidated in the consolidated financial statements of the Group as at 31 December 2021. Total assets and net loss of Arıcak as of and for the period ended 31 December 2021 are TRY 766 Thousand and TRY 61 Thousand, respectively. Consequently, we were unable to determine whether any adjustments to these amounts were necessary.



We conducted our audit in accordance with International Standards on Auditing (“ISAs”). Our responsibilities under those standards are further described in the *Auditor’s Responsibilities for the Audit of the Consolidated Financial Statements* section of our report. We are independent of the Group in accordance with the International Ethics Standards Board for Accountants’ *Code of Ethics for Professional Accountants* (the “IESBA Code”) together with ethical requirements that are relevant to our audit of the financial statements in Turkey, and we have fulfilled our other ethical responsibilities in accordance with the IESBA Code. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our qualified opinion.

### Key Audit Matter

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the consolidated financial statements of the current period. These matters were addressed in the context of our audit of the consolidated financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters. In addition to the matter described in Basis for Qualified Opinion section we have determined the matters described below the key audit matter to be communicated in our report.

#### Impairment of loans measured at amortised cost

Refer to Note 2.17 to the consolidated financial statements for summary of accounting policies and significant judgments of for impairment of loans measured at amortised cost.

Key audit matter	How the matter is addressed in our audit
<p>As of 31 December 2021, loans comprise 76% of the Group’s total assets.</p> <p>The Group recognizes its loans measured at amortised cost in accordance with IFRS 9 Financial Instruments standard (“Standard”).</p> <p>In determining the impairment of financial assets, the Group applies “expected credit loss model” which contains significant assumptions and estimates.</p> <p>The significant assumptions and estimates of the Group’s management are as follows:</p> <ul style="list-style-type: none"> <li>• determination of significant increase in credit risk since initial recognition of loans in financial statements.</li> <li>• incorporating the forward looking macroeconomic information in calculation of credit risk.</li> <li>• design and implementation of expected credit loss model.</li> </ul> <p>The determination of the impairment of loans measured at amortised cost depends on the credit default status, the model based on the change in the credit risk at the</p>	<p>Our procedures for auditing the impairment of loans measured at amortised cost include below:</p> <ul style="list-style-type: none"> <li>• We tested the design and operating effectiveness of the controls on lending, collateralization, collection, follow-up, classification and impairment procedures are tested with the involvement of information risk management specialists. We evaluated the adequacy of the subjective and objective criteria that is defined in the Group’s impairment accounting policy compared with the Standard.</li> <li>• We evaluated the model and methodology and the evaluation of the calculations carried out with the control testing and detail analysis by the involvement of specialist.</li> <li>• We performed loan reviews for selected loan samples which include a detailed examination of loan files and related information and evaluation of their classification. In this context, the current status of the loan customer has been evaluated by including forward looking</li> </ul>



<p>first recognition date and the classification of the loans measured at amortised cost according to the model.</p> <p>Establishing an accurate classification is a significant process as the calculation of expected credit loss varies to the staging of the financial assets.</p> <p>The Group calculates expected credit losses on both an individual and a collective basis. Individual provisions consider the estimated future performance of the business and the fair value of the collateral provided for credit transactions.</p> <p>The collective basis expected credit loss calculation is based on complex processes which are modelled by using current and past data sets and expectations. The completeness and accuracy of data sets in the model are also considered and the forward looking expectations are reflected by macroeconomic models.</p> <p>Impairment on loans measured at amortised cost is determined as a key audit matter, due to the significance of the estimates, assumptions including the impact of COVID-19 pandemic, the level of judgements and its complex structure as explained above.</p>	<p>information and macroeconomic expectations including the impact of COVID-19 pandemic.</p> <ul style="list-style-type: none"> <li>• We evaluated the accuracy of the expected credit loss calculations for the loans which are assessed on individual basis including the impact of COVID-19 on the assumptions and estimates.</li> <li>• We tested the accuracy and completeness of the data in calculation of the data in the calculation models for the loans which are assessed on collective basis. We recalculated the expected credit loss calculation. The models used for the calculation of the risk parameters were examined and the risk parameters for the selected sample portfolios were recalculated.</li> <li>• We assessed the macroeconomic models which are used to reflect forward looking expectations including the impact of COVID-19 pandemic and tested the effect of the risk parameters by recalculation method.</li> <li>• We evaluated the qualitative and quantitative assessments which are used in determining the significant increase in credit risk.</li> <li>• We evaluated the adequacy of the disclosures in the consolidated financial statements related to impairment provisions.</li> </ul>
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### Responsibilities of Management and Those Charged with Governance for the Consolidated Financial Statements

Management is responsible for the preparation and fair presentation of the consolidated financial statements in accordance with IFRSs, and for such internal control as management determines is necessary to enable the preparation of consolidated financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the consolidated financial statements, management is responsible for assessing the Group's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Group or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the Group's financial reporting process.



## Auditor's Responsibilities for the Audit of the Consolidated Financial Statements

Our objectives are to obtain reasonable assurance about whether the consolidated financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these consolidated financial statements.

As part of an audit in accordance with ISAs, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the consolidated financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Group's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the consolidated financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Group to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the consolidated financial statements, including the disclosures, and whether the consolidated financial statements represent the underlying transactions and events in a manner that achieves fair presentation.
- Obtain sufficient appropriate audit evidence regarding the financial information of the entities or business activities within the Group to express an opinion on the consolidated financial statements. We are responsible for the direction, supervision and performance of the group audit. We remain solely responsible for our audit opinion.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.



From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the consolidated financial statements of the current year and are therefore the key audit matters. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

KPMG Bağımsız Denetim ve Serbest Muhasebeci Mali Müşavirlik A.Ş.

A handwritten signature in blue ink, appearing to read 'Orhan Akova'.

Orhan Akova  
Partner

2 June 2022  
Istanbul, Turkey

**TÜRKİYE KALKINMA VE YATIRIM BANKASI A.Ş. AND ITS SUBSIDIARIES**  
**CONSOLIDATED STATEMENT OF FINANCIAL POSITION**  
**AS AT 31 DECEMBER 2021**

Amounts expressed in thousands of Turkish Lira (TRY) unless otherwise stated.

	Notes	31 December 2021	31 December 2020
<b>ASSETS</b>			
Cash and deposits with banks and other financial institutions	4	3,273,127	3,555,698
Balances with Central Bank	4	2,026	1,115
Money market placements	4	992,465	1,499,794
Financial assets measured at fair value through profit or loss	5	220,867	119,725
Derivative financial assets		365	43
Loans and advances to customers	7	28,589,229	15,541,969
Loans and advances to financial institutions	6	8,101,776	4,512,970
Investment securities	8	6,943,735	2,681,802
Investments in associates	9	14,571	21,997
Premises and equipment	10	17,123	22,545
Intangible assets	12	21,875	17,744
Deferred tax asset	16	95,678	18,054
Other assets	13	107,279	78,583
<b>Total assets</b>		<b>48,380,116</b>	<b>28,072,039</b>
<b>LIABILITIES AND EQUITY</b>			
<b>LIABILITIES</b>			
Funds borrowed	14	39,439,726	22,007,957
Subordinated liabilities	14	3,350,857	1,993,243
Money market funds	14	629,707	203,850
Derivative liabilities		26,693	47
Income taxes payable	16	25,198	45,284
Provisions	15	50,974	39,048
Other liabilities	15	338,530	194,856
Marketable securities issued		51,882	-
<b>Total liabilities</b>		<b>43,913,567</b>	<b>24,484,285</b>
<b>EQUITY</b>			
<b>Equity attributable to equity holders of the parent</b>			
Share capital issued	17	2,276,911	1,876,911
Share premium		3,747	3,683
Other reserves		(24,551)	14,272
Legal reserves		95,120	70,028
Retained earnings		2,115,322	1,622,860
<b>Total equity</b>		<b>4,466,549</b>	<b>3,587,754</b>
<b>Total liabilities and equity</b>		<b>48,380,116</b>	<b>28,072,039</b>
<b>Commitments and contingencies</b>		<b>2,709,509</b>	<b>755,055</b>

The accompanying policies and explanatory notes are an integral part of these consolidated financial statements.

**TÜRKİYE KALKINMA VE YATIRIM BANKASI A.Ş. AND ITS SUBSIDIARIES**  
**CONSOLIDATED STATEMENT OF PROFIT OR LOSS**  
**FOR THE YEAR ENDED 31 DECEMBER 2021**

Amounts expressed in thousands of Turkish Lira (TRY) unless otherwise stated.

	Notes	1 January – 31 December 2021	1 January – 31 December 2020
<b>Interest income</b>			
Interest on loans and advances	21	1,373,963	811,131
Interest on securities	21	333,814	188,423
Interest on deposits with banks and other financial institutions	21	372,703	135,705
Interest on other money market placements	21	139,605	81,075
Other interest income		42	45
<b>Total interest income</b>		<b>2,220,127</b>	<b>1,216,379</b>
<b>Interest expense</b>			
Interest on money market operations		(40,437)	(5,737)
Interest on funds borrowed	22	(772,495)	(465,361)
Other interest expense		(30,099)	(7,962)
<b>Total interest expense</b>		<b>(843,031)</b>	<b>(479,060)</b>
<b>Net interest income</b>		<b>1,377,096</b>	<b>737,319</b>
<b>Fees and commissions and other operating income</b>			
Fees and commissions income	25	64,745	31,144
Fees and commissions expenses	25	(15,960)	(10,521)
<b>Net fees and commissions income</b>		<b>48,785</b>	<b>20,623</b>
Foreign exchange gains / (loss)		49,559	67,603
Net trading gain / (loss)		19,594	(51,984)
Other operating income	23	73,151	140,364
Other operating expenses	24	(207,281)	(163,446)
(Provisions for) impairment of loans and other assets		(455,158)	(132,960)
Dividend income		105,974	-
<b>Operating profit</b>		<b>1,011,720</b>	<b>617,519</b>
Income from associates	9	4,390	5,000
<b>Profit before income tax</b>		<b>1,016,110</b>	<b>622,519</b>
Income tax expense	16	(257,424)	(143,198)
Deferred tax income	16	58,868	24,330
<b>Profit for the year</b>		<b>817,554</b>	<b>503,651</b>
<b>Profit attributable to:</b>			
Equity holders of the parent		817,554	503,651
<b>Earnings per share (per shares) (Full TRY)</b>	19	<b>0.005</b>	<b>0.006</b>

The accompanying policies and explanatory notes are an integral part of these consolidated financial statements.

**TÜRKİYE KALKINMA VE YATIRIM BANKASI A.Ş. AND ITS SUBSIDIARIES**  
**CONSOLIDATED STATEMENT OF OTHER COMPREHENSIVE INCOME**  
**FOR THE YEAR ENDED 31 DECEMBER 2021**

Amounts expressed in thousands of Turkish Lira (TRY) unless otherwise stated.

	Notes	1 January - 31 December 2021	1 January - 31 December 2020
<b>Profit for the year</b>		<b>817,554</b>	<b>503,651</b>
<b>Other comprehensive income</b>			
<i>Items that will not be reclassified subsequently to profit or loss:</i>			
Actuarial gain/(loss)		(813)	(625)
Tax effect of actuarial gain/(loss)		163	125
<i>Items that may be reclassified subsequently to profit or loss:</i>			
Net value gains / (losses) on financial assets measured at fair value through other comprehensive income (FVOCI)		(56,766)	(26,571)
Tax effect of net value gains/ (losses) on financial assets measured at fair value through other comprehensive income (FVOCI)		18,593	5,281
<b>Other comprehensive income / (loss) for the year, net of tax</b>		<b>(38,823)</b>	<b>(21,790)</b>
<b>Total comprehensive income for the year</b>		<b>778,731</b>	<b>481,861</b>
<b>Total comprehensive income attributable to:</b>			
Equity holders of the parent		778,731	481,861

The accompanying policies and explanatory notes are an integral part of these consolidated financial statements.

**TÜRKİYE KALKINMA VE YATIRIM BANKASI A.Ş. AND ITS SUBSIDIARIES**  
**CONSOLIDATED STATEMENT OF CHANGES IN EQUITY**  
**FOR THE YEAR ENDED 31 DECEMBER 2021**

Amounts expressed in thousands of Turkish Lira (TRY) unless otherwise stated.

	Share capital	Adjustment to share capital	Share Premium	Actuarial gain/(loss)	Unrealized gains/(losses) on financial assets measured at fair value through other comprehensive income (FVOCI)	Legal Reserves	Retained earnings	Total Equity
<b>At 1 January 2021</b>	<b>1,600,000</b>	<b>276,911</b>	<b>3,683</b>	<b>(348)</b>	<b>14,620</b>	<b>70,028</b>	<b>1,622,860</b>	<b>3,587,754</b>
Profit for the year	-	-	-	-	-	-	817,554	817,554
Actuarial gain/(loss):								
Gains/(Losses) arising during the year	-	-	-	(813)	-	-	-	(813)
Financial assets measured at fair value through other comprehensive income (FVOCI):								
Gains/(Losses) arising during the year	-	-	-	-	(56,766)	-	-	(56,766)
Less: Transfer to statement of income	-	-	-	-	-	-	-	-
Income tax relating to components of other comprehensive income	-	-	-	163	18,593	-	-	18,756
<b>Other comprehensive income</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>(650)</b>	<b>(38,173)</b>	<b>-</b>	<b>-</b>	<b>(38,823)</b>
Total comprehensive income for the year	-	-	-	(650)	(38,173)	-	817,554	778,731
<i>Owners' equity changes:</i>								
Capital increase in cash	100,000	-	64	-	-	-	-	100,064
Insurance of share certificates	300,000	-	-	-	-	-	(300,000)	-
Dividends paid	-	-	-	-	-	-	-	-
Transfer to legal reserves	-	-	-	-	-	25,092	(25,092)	-
<b>At 31 December 2021</b>	<b>2,000,000</b>	<b>276,911</b>	<b>3,747</b>	<b>(998)</b>	<b>(23,553)</b>	<b>95,120</b>	<b>2,115,322</b>	<b>4,466,549</b>

The accompanying policies and explanatory notes are an integral part of these consolidated financial statements.

**TÜRKİYE KALKINMA VE YATIRIM BANKASI A.Ş. AND ITS SUBSIDIARIES**  
**CONSOLIDATED STATEMENT OF CHANGES IN EQUITY**  
**FOR THE YEAR ENDED 31 DECEMBER 2020**

Amounts expressed in thousands of Turkish Lira (TRY) unless otherwise stated.

	Share capital	Adjustment to share capital	Share Premium	Actuarial gain/(loss)	Unrealized gains/(losses) on financial assets measured at fair value through other comprehensive income (FVOCI)	Legal Reserves	Retained earnings	Total Equity
<b>At 1 January 2020</b>	<b>850,000</b>	<b>276,911</b>	<b>1,983</b>	<b>152</b>	<b>35,910</b>	<b>47,673</b>	<b>1,141,564</b>	<b>2,354,193</b>
Profit for the year	-	-	-	-	-	-	503,651	503,651
Actuarial gain/(loss):								
Gains/(Losses) arising during the year	-	-	-	(625)	-	-	-	(625)
Financial assets measured at fair value through other comprehensive income (FVOCI):								
Gains/(Losses) arising during the year	-	-	-	-	(26,571)	-	-	(26,571)
Less: Transfer to statement of income	-	-	-	-	-	-	-	-
Income tax relating to components of other comprehensive income	-	-	-	125	5,281	-	-	5,406
<b>Other comprehensive income</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>(500)</b>	<b>(21,290)</b>	<b>-</b>	<b>-</b>	<b>(21,790)</b>
Total comprehensive income for the year	-	-	-	(500)	(21,290)	-	503,651	481,861
<i>Owners' equity changes:</i>								
Capital increase in cash	750,000	-	-	-	-	-	-	750,000
Insurance of share certificates	-	-	1,700	-	-	-	-	1,700
Dividends paid	-	-	-	-	-	-	-	-
Transfer to legal reserves	-	-	-	-	-	22,355	(22,355)	-
<b>At 31 December 2020</b>	<b>1,600,000</b>	<b>276,911</b>	<b>3,683</b>	<b>(348)</b>	<b>14,620</b>	<b>70,028</b>	<b>1,622,860</b>	<b>3,587,754</b>

The accompanying policies and explanatory notes are an integral part of these consolidated financial statements.

**TÜRKİYE KALKINMA VE YATIRIM BANKASI A.Ş. AND ITS SUBSIDIARIES**  
**CONSOLIDATED STATEMENT OF CASH FLOWS**  
**FOR THE YEAR ENDED 31 DECEMBER 2021**

Amounts expressed in thousands of Turkish Lira (TRY) unless otherwise stated.

	Notes	1 January – 31 December 2021	1 January – 31 December 2020
<b>Cash flows from operating activities</b>			
Interest received		1,823,220	1,107,399
Interest paid		(564,094)	(405,283)
Fees and commissions received		55,094	31,144
Fees and commissions paid		(15,960)	(10,521)
Dividend received		105,975	5,556
Recoveries from impairment of loans and other assets		22,463	36,348
Cash payments to employees and other parties		(100,209)	(101,430)
Other operating activities		(281,093)	(98,576)
Income taxes paid		(289,631)	(148,316)
<b>Cash flows from operating activities before changes in operating assets and liabilities</b>		<b>755,765</b>	<b>416,321</b>
<b>Changes in operating assets and liabilities</b>			
Net (increase)/decrease in financial assets on FVTPL		74,760	(8,664)
Net (increase)/decrease in loans and advances		(3,097,730)	(838,995)
Net (increase)/decrease in other assets		(43,991)	7,009
Net increase/(decrease) in other liabilities		1,036,428	317,903
Net increase/(decrease) in money market deposits		426,283	153,569
Proceeds from funds borrowed		1,210,921	1,807,371
<b>Net cash used in operating activities</b>		<b>362,436</b>	<b>1,854,514</b>
<b>Cash flows from investing activities</b>			
Purchases of investment securities at FVOCI		(4,214,092)	(446,340)
Proceeds from sale and redemption of securities at FVOCI		2,378,657	235,725
Purchases of investment securities at amortised cost		(114,880)	(190,044)
Proceeds from redemption of investment securities at amortised cost		10,175	26,602
Purchases of premises and equipment		(2,727)	(5,202)
Proceeds from sale of premises and equipment		77,303	171,521
Purchases of intangible assets		(8,101)	(21,150)
Purchases of equity participations		8,574	-
<b>Net cash provided / (used in) from investing activities</b>		<b>(1,865,091)</b>	<b>(228,888)</b>
<b>Cash flows from financing activities</b>			
Capital increase		100,064	750,000
Payments for leases		(6,942)	(6,754)
<b>Net cash provided by / (used in) financing activities</b>		<b>93,122</b>	<b>743,246</b>
Effect of net foreign exchange difference		614,449	217,938
Net increase/(decrease) in cash and cash equivalents		(795,084)	2,586,810
Cash and cash equivalents at the beginning of the year	4	5,057,379	2,470,569
<b>Cash and cash equivalents at the end of the year</b>	<b>4</b>	<b>4,262,295</b>	<b>5,057,379</b>

The accompanying policies and explanatory notes are an integral part of these consolidated financial statements.

**TÜRKİYE KALKINMA VE YATIRIM BANKASI A.Ş. AND ITS SUBSIDIARIES**  
**NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS**  
**FOR THE YEAR ENDED 31 DECEMBER 2021**

Amounts expressed in thousands of Turkish Lira (TRY) unless otherwise stated.

**1. GENERAL INFORMATION ABOUT THE BANK**

The Bank was established on 27 November 1975 according to the Decree Based on Law numbered 13 as a related institution of the Ministry of Trade and Technology with the legal title of “Devlet Sanayi ve İşçi Yatırım Bankası A.Ş.”. Some adjustments were made on the status of the Bank with the Decree Based on Law numbered 165 dated 14 November 1983.

On 15 July 1988, its legal title was changed to Türkiye Kalkınma Bankası A.Ş. by being associated to the Prime Ministry in the context of the Decree Law numbered 329 and in parallel with the developments in its activities. The Bank had become a development and investment bank that provides financing support to companies in tourism sector as well as trade sector by taking over T.C. Turizm Bankası A.Ş. with all of its assets and liabilities with the decision of Supreme Planning Council dated 20 January 1989 and numbered 89/T-2. Also with the Decree Law numbered 401 dated 12 February 1990, some of the articles related to the Bank status were changed.

With the Law dated 14 October 1999 and numbered 4456, Decree Law numbered 13, 165, 329 and 401 were revoked and the establishment and operating principles of the Bank were rearranged.

With Türkiye Kalkınma ve Yatırım Bankası A.Ş. Law dated 24 October 2018 and numbered 7147, the Law dated 14 October 1999 and numbered 4456 was revoked. The Bank’s name was changed to Türkiye Kalkınma ve Yatırım Bankası A.Ş. with the law numbered 7147.

The Bank is subject to the registered capital system. 99.08% of the capital is owned by the Republic of Turkey Ministry of Treasury and Finance and the remaining shares are quoted on the Borsa İstanbul (“BİST”).

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES**

**2.1 Statement of Compliance**

The financial statements have been prepared in accordance with International Financial Reporting Standards (“IFRS”).

The consolidated financial statements of the Group were authorized for issuance by the management on 2 June 2022.

**2.2. Basis of Preparation**

These consolidated financial statements have been prepared on the historical cost except for those assets and liabilities measured at fair value. Historical cost is generally based on the fair value of the consideration given in exchange for assets.

**2.3 Basis of Presentation of Consolidated Financial Statements**

The consolidated financial statements of the Group have been prepared in accordance with International Financial Reporting Standards (“IFRS”). These consolidated financial statements have been prepared under the historical cost convention, except those assets and liabilities that have been measured at fair value.

The Bank and its subsidiaries are incorporated in Turkey and maintain their books of account and prepare their statutory financial statements in accordance with the regulations on accounting and reporting framework and accounting standards which are determined by the provisions of Turkish Banking Law and accounting standards promulgated by the other relevant law and regulations. The foreign associates maintain their books of account and prepare their statutory financial statements in their local currencies and in accordance with the regulations of the countries in which they operate. The accompanying financial statements differ from the financial statements prepared for statutory purposes in that they reflect certain adjustments, appropriate to present the financial position, results of operations and cash flows in accordance with IFRS, which are not recorded in the accounting books of the Group’s entity.

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**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**2.4 Inflation Accounting**

The cumulative inflation over the past three years has risen to just above 100% in the first quarter of 2022. Based on this information, Turkey is considered a hyperinflationary economy for reporting periods ending on or after 30 April 2022. Accordingly, entities with operations whose functional currency is the Turkish Lira should expect to apply IAS 29 for those operations in financial statements for reporting periods ending on or after 30 April 2022.

**2.5 Basis of Consolidation**

The consolidated financial statements incorporate the financial statements of the Bank and entity controlled by the Bank (its subsidiaries). Control is achieved where the Bank has the power to govern the financial and operating policies of an investee entity so as to obtain benefits from its activities.

The results of subsidiaries acquired or disposed of during the year are included in the consolidated income statement from the effective date of acquisition or up to the effective date of disposal, as appropriate.

Where necessary, adjustments are made to the financial statements of subsidiaries to bring their accounting policies into line with those used by other members of the Group.

All intra-group transactions, balances, income and expenses are eliminated on consolidation.

Subsidiaries included in consolidation and effective shareholding percentages of the Group as of 31 December 2021 and 2020 are as follows:

	Place of Incorporation	Effective Shareholding %		Voting Rights %	
		31 December 2021	31 December 2020	31 December 2021	31 December 2020
Arıcak Turizm ve Ticaret A.Ş. ("Arıcak")	İstanbul/Turkey	99.71%	99.71%	100%	100%
Kalkınma Girişim Sermayesi Portföy Yönetimi A.Ş.	İstanbul/Turkey	100%	100%	100%	100%
Kalkınma Yatırım Varlık Kiralama A.Ş.	İstanbul/Turkey	100%	100%	100%	100%

**2.6 Investments in Associates**

The Group's investments in associates accounted for under the equity method of accounting is as follows:

	Place of Incorporation	Effective Shareholding %		Voting Rights %	
		31 December 2021	31 December 2020	31 December 2021	31 December 2020
Maksan A.Ş.	Malatya	31.14%	31.14%	20.00%	20.00%
Türk Suudi Holding A.Ş. (*)	Istanbul	24.69%	24.69%	10.00%	10.00%

(\*) Türk Suudi Holding A.Ş shares were sold as of 31 December 2021.

An associate is an entity over which the Group has significant influence and that are neither subsidiaries nor an interest in a joint venture. Significant influence is the power to participate in the financial and operating policy decisions of the investee but is not control or joint control over those policies.

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**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**2.6 Investments in Associates (continued)**

The results and assets and liabilities of associates are incorporated in these financial statements using the equity method of accounting, except when the investment is classified as held for sale, in which case it is accounted for under IFRS 5 *Non-current Assets Held for Sale and Discontinued Operations*. Under the equity method, an investment in associate is initially recognized in the consolidated statement of financial position at cost and adjusted thereafter to recognize the Group's share of the profit or loss and other comprehensive income of the associate. When the Group's share of losses of an associate exceeds the Group's interest in that associate (which includes any long-term interests that, in substance, form part of the Group's net investment in the associate), the Group discontinues recognizing its share of further losses. Additional losses are recognized only to the extent that the Group has incurred legal or constructive obligations or made payments on behalf of the associate.

When necessary, the entire carrying amount of the investment (including goodwill) is tested for impairment in accordance with IAS 36 *Impairment of Assets* as a single asset by comparing its recoverable amount (higher of value in use and fair value less costs to sell) with its carrying amount. Any impairment loss recognized forms part of the carrying amount of the investment. Any reversal of that impairment loss is recognized in accordance with IAS 36 to the extent that the recoverable amount of the investment subsequently increases.

Where a group entity transacts with its associate, profits and losses resulting from the transactions with the associate are recognized in the Group's consolidated financial statements only to the extent of interests in the associate that are not related to the Group.

**2.7 Use of Estimates and Judgments**

The preparation of the financial statements requires management to make estimates and assumptions that are reflected in the measurement of income and expenses in the profit and loss statement and in the carrying value of assets and liabilities in the balance sheet, and in the disclosure of information in the notes to the financial statements. Management do exercise judgment and make use of information available at the date of the preparation of the financial statements in making these estimates. The actual future results from operations in respect of the areas where these judgments and estimates have been made may in reality be different than those estimates. This may have a material effect on the financial statements. The judgments and estimates that may have a significant effect on amounts recognized in the financial statements are discussed in the relevant sections below.

The coronavirus disease (COVID-19), which emerged in the People's Republic of China in the end of December 2019 and spread to other countries, was declared a pandemic on 11 March 2020 by the World Health Organization. In order to keep the negative economic effects of the epidemic to a minimum, some measures are taken both in our country and around the world. The effects of these developments on the Bank's financial status and activities are closely monitored by the relevant units and the Bank's Top Management.

The effects and forecasts of the COVID-19 outbreak are included in the model in accordance with IFRS 9 *Financial Instruments Standard* and the expected credit loss provisions calculated are reflected in the financial statements as of 31 December 2021.

Due to the COVID-19 epidemic, which has influenced the whole world, it is seen that since mid-March 2020, many enterprises have suspended their activities for a certain period of time or have been restricted to certain sectors within the framework of measures taken to create remote working conditions. It is known that many businesses will be negatively affected by this situation, but the extent of this effect cannot be predicted. The Bank analyzed the effects of COVID-19 to the sectors in which the loans in the loan portfolio are used, and updated the sector parameters with the assumption that the foreseen risk was not systematic and reflected the epidemic effect to IFRS 9 parameters by considering the relationships between IFRS 9 parameters and sectoral risk level. Economic developments and negative expectations due to the COVID-19 outbreak were reflected in the expected loan loss calculation as of 31 December 2021, within the Bank's projections.

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**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**2.8 Functional and Presentation Currency**

These consolidated financial statements are presented in Turkish Lira (“TRY”), which is the Bank’s functional currency. Except as indicated, financial information presented in TRY has been rounded to the nearest thousand.

**2.9 Foreign Currency Transactions and Translation**

Transactions in currencies other than the entity’s functional currency (foreign currencies) are recorded at the rates of exchange prevailing at the dates of the transactions. At each balance sheet date, monetary items denominated in foreign currencies are retranslated at the rates prevailing at the balance sheet date. Non-monetary items carried at fair value that are denominated in foreign currencies are retranslated at the rates prevailing at the date when the fair value was determined. Non-monetary items that are measured in terms of historical cost in a foreign currency are not retranslated. Exchange differences are recognized in profit or loss in the period in which they arise.

Foreign currency translation rates used by the Group as of respective year-ends are as follows:

	<b>EUR/TRY</b>	<b>USD/TRY</b>
31 December 2021	14.857	13.138
31 December 2020	9.141	7.443

**2.10 Changes in Accounting Policies**

The accounting policies adopted in the preparation of the consolidated financial statements as at 31 December 2021 are consistent with those followed in the preparation of the consolidated financial statements of the prior year, except for the adoption of new standards effective as of 1 January 2021. Several amendments and interpretations apply for the first time in 2021, but do not have an impact on the consolidated financial statements of the Group.

**2.11 Premises and Equipment**

Premises and equipment are carried at cost less accumulated depreciation and any accumulated impairment losses. Land is not depreciated and carried at cost less accumulated impairment.

Depreciation is charged so as to write off the cost or valuation of assets, other than land and properties under construction, over their estimated useful lives, using the straight-line method. The estimated useful lives, residual values and depreciation method are reviewed at each year end, with the effect of any changes in estimate accounted for on a prospective basis.

Gain or loss arising from the disposal or retirement of an item of premises and equipment is determined as the difference between the sales proceeds and the carrying amount of that asset and is recognized in profit or loss.

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**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**2.11 Premises and Equipment (continued)**

Ordinary maintenance and repair expenses on premises and equipment items are recognized as expenses. Investment expenditures that increase the future benefit by enhancing the capacity of tangible assets are capitalized. Investment expenditures include cost items that extend the useful life of the asset, increase the servicing capabilities of the asset, improve the quality of goods or services produced or reduce the costs.

Tangible fixed assets are amortized by using the straight-line method over their estimated useful lives. Estimated depreciation rates of tangible fixed assets are as follows:

	Depreciation Rate
Buildings	2%
Safes	2%
Vehicles	20%
Other Tangible Assets	6.66% - 33.33%

There is no change in accounting estimations that has material effect in the current period or that is expected to have effect in the subsequent periods.

**2.12 Intangible Assets**

Intangible assets acquired are reported at cost less accumulated depreciation and accumulated impairment losses.

Amortization is charged on a straight-line basis over their estimated useful life which is 33.33%. The estimated useful life and amortization method are reviewed at the date of each annual reporting period, with the effect of changes in the estimate being accounted for on a prospective basis.

Intangible assets are assessed for impairment whenever there is an indication that the intangible asset may be impaired. There is no impairment recorded related to intangible assets at the accompanying consolidated financial statements.

Gains or losses arising from derecognition of an intangible asset are measured as the difference between the net disposal proceeds and the carrying amount of the asset and are recognized in the income statement when the asset is derecognized.

**2.13 Impairment of Non-financial Assets**

Assets that have an indefinite useful life, for example goodwill, are not subject to amortization and are tested annually for impairment. Assets that are subject to amortization are reviewed for impairment whenever events or changes in circumstances indicate that the carrying amount may not be recoverable. An impairment loss is recognized for the amount by which the asset's carrying amount exceeds its recoverable amount. The recoverable amount is the higher of an asset's fair value less costs to sell and value in use. For the purposes of assessing impairment, assets are grouped at the lowest levels for which there are separately identifiable cash flows (cash-generating units). Non-financial assets other than goodwill that suffered impairment are reviewed for possible reversal of the impairment at each reporting date.

**2.14 Investment Property**

Investment property, which is property, held to earn rentals and/or for capital appreciation is carried at cost less accumulated depreciation and any accumulated impairment losses. The carrying amount includes the cost of replacing part of an existing investment property at the time that cost is incurred if the recognition criteria are met; and excludes the costs of day to day servicing of an investment property. Depreciation is provided on investment property on a straight-line basis. The depreciation period for investment property is 50 years.

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**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**2.15 Financial Instruments**

**Initial recognition of financial instruments**

It shall be recognised a financial asset or a financial liability in the statement of financial position when, and only when, an entity becomes party to the contractual provisions of the instrument. A regular way purchase or sale of financial assets shall be recognised and derecognised, as applicable, using trade date accounting or settlement date accounting. Purchase and sale transactions of securities are accounted at the settlement date.

**Initial measurement of financial instruments**

The classification of financial instruments at initial recognition depends on the contractual conditions and the relevant business model. At initial recognition, the Group shall measure a financial asset or financial liability at its fair value plus or minus, in the case of a financial asset or financial liability not at FVPL, transaction costs that are directly attributable to the acquisition or issue of the financial asset or financial liability.

**Classification of financial instruments**

On which category a financial instrument shall be classified at initial recognition depends on both the business model for managing the financial assets and the contractual cash flow characteristics of the financial asset.

**Assessment of the business model**

The business model is determined at a level that reflects how groups of financial assets are managed together to achieve a particular business objective. The business model does not depend on management's intentions for an individual instrument. Accordingly, this condition is not an instrument-by-instrument approach to classification and should be determined on a higher level of aggregation.

The business models are divided into three categories. These categories are defined below:

- A business model whose objective is to hold assets in order to collect contractual cash flows: a business model whose objective is to hold assets in order to collect contractual cash flows are managed to realize cash flows by collecting contractual payments over the life of the instrument. The financial assets that are held within the scope of this business model are measured at amortised cost when the contractual terms of the financial asset meet the condition of giving rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.
- A business model whose objective is achieved by both collecting contractual cash flows and selling financial assets: it may be held financial assets in a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets. Fair value change of the financial assets that are held within the scope of this business model are accounted under other comprehensive income when the contractual terms of the financial asset meet the condition of giving rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.
- Other business models: financial assets are measured at fair value if they are not held within a business model whose objective is to hold assets to collect contractual cash flows or within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets.

**Contractual cash flows that are solely payments of principal and interest on the principal amount outstanding**

A financial asset is classified on the basis of its contractual cash flow characteristics if the financial asset is held within a business model whose objective is to hold assets to collect contractual cash flows or within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets.

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**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**2.15 Financial Instruments (continued)**

**Contractual cash flows that are solely payments of principal and interest on the principal amount outstanding (continued)**

In a basic lending arrangement, consideration for the time value of money and credit risk are typically the most significant elements of interest. In order to assess whether the element provides consideration for only the passage of time, an entity applies judgement and considers relevant factors such as the currency in which the financial asset is denominated and the period for which the interest rate is set.

When the contractual conditions are exposed to the risks which are not consistent with the basic lending arrangement or variability of cash flows, the relevant financial asset is measured at fair value.

**Measurement categories of financial assets and liabilities**

As of 1 January 2019, all financial assets are classified based on the business model for managing the financial assets. Accordingly, financial assets are classified in four main categories as listed below:

- Financial instruments measured at amortised cost,
- Fair Value Through Other Comprehensive Income (“FVOCI”),
- Financial assets at fair value through profit/loss (“FVPL”).

***Financial instruments measured at amortised cost***

Starting from 1 January 2019, financial assets are classified as measured at amortised cost if both of the following conditions are met.

- the financial asset is held within a business model whose objective is to hold financial assets in order to collect contractual cash flows and
- the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

*Debt securities measured at amortised cost:* subsequent to the initial recognition, debt securities are measured at amortised cost by using the effective interest rate method.

*Loans and receivables:* financial assets other than those held for trading in short term or generated through providing money, commodity and services to debtors. Loans are financial assets with fixed or determinable payments and not quoted in an active market.

Loans and receivables are recognised at cost and also measured at amortised cost by using the effective interest method.

All financial liabilities are classified as subsequently measured at amortised cost except for financial liabilities at FVPL, financial liabilities that arise when a transfer of a financial asset does not qualify for derecognition, financial guarantee contracts, commitments to provide a loan at a below-market interest rate, and contingent consideration recognised by an acquirer in a business combination.

***Financial instruments measured at FVOCI***

Financial investments are classified as measured at FVOCI if both of the following conditions are met.

- the financial asset is held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets and
- the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

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**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**2.15 Financial Instruments (continued)**

***Financial instruments measured at FVOCI (continued)***

A gain or loss on a financial asset measured at FVOCI shall be recognised in other comprehensive income, except for impairment gains or losses and foreign exchange gains and losses, until the financial asset is derecognised or reclassified. If the financial asset is reclassified, the cumulative gain or loss previously recognised in other comprehensive income is reclassified from equity to profit or loss as a reclassification adjustment at the reclassification date.

Financial assets measured at FVOCI are measured at their fair values subsequently. However, assets for which fair values could not be determined reliably are valued at amortised cost by using the discounting method with internal rate of return for floating-rate securities; and by using valuation models or discounted cash flow techniques for fixed-rate securities. Unrecognised gain/losses derived from the difference between their fair value and the discounted values are recorded in accumulated other comprehensive income or expense to be reclassified to profit or loss under the shareholders' equity. In case of sales, the gain/losses arising from fair value measurement accumulated under shareholders' equity are recognised in statement of profit or loss and other comprehensive income.

Interests calculated and/or earned by using the effective interest method during holding of financial assets measured at FVOCI are recorded primarily in interest income. On derecognition of such financial assets, the difference between the carrying amount of the asset and the sum of the consideration received and any cumulative gain or loss that had been recognised in other comprehensive income is recognised in profit or loss.

At initial recognition, it can be made an irrevocable election to present in other comprehensive income subsequent changes in the fair value of an investment in an equity instrument within the scope of IFRS 9 that is neither held for trading nor contingent consideration recognised by an acquirer in a business combination to which IFRS 3 applies. Such election is made on an instrument by instrument basis.

Amounts presented in other comprehensive income shall not be subsequently recycled to profit or loss. However, the cumulative gain or loss shall be recycled to prior period's profit or loss. Dividends on such investments are recognised in profit or loss unless the dividend clearly represents a recovery of part of the cost of the investment. IFRS 9 impairment requirements are not applicable for equity instruments.

***Financial assets and liabilities measured at FVPL***

Financial assets at FVPL are valued at their fair values and gain/loss arising on those assets is recorded in the statement of profit or loss. Interest income earned on these assets and the difference between their acquisition costs and amortised costs are recorded as interest income in the statement of profit or loss. The differences between the amortised costs and the fair values of such assets are recorded under net trading income/(expense) in the statement of profit or loss. In cases where such assets are sold before their maturities, the gains/losses on such sales are recorded under net trading income/(expense).

**Derecognition of financial instruments**

***Derecognition of financial assets due to change in the contractual terms***

Based on IFRS 9, the renegotiation or modification of the contractual cash flows of a financial asset can lead to the derecognition of the existing financial asset. When the modification of a financial asset results in the derecognition of the existing financial asset and the subsequent recognition of the modified financial asset, the modified asset is considered a "new" financial asset.

When it is assessed the characteristics of the new contractual terms of the financial asset, it is also evaluated the contractual cash flows including foreign currency rate changes, conversion to equity, counterparty changes and solely principal and interest on principle.

When the contractual cash flows of a financial asset are renegotiated or otherwise modified and the renegotiation or modification does not result in the derecognition of that financial asset, it is recalculated the gross carrying amount of the financial asset and recognised a modification gain or loss in profit or loss.

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**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**2.15 Financial Instruments (continued)**

**Derecognition of financial instruments (continued)**

*Derecognition of financial liabilities*

Where all risks and rewards of ownership of the asset have not been transferred to another party and it is retained control of the asset, it is continued to be recognised the remaining portion of the asset and liabilities arising from such asset.

When it is retained substantially all the risks and rewards of ownership of the transferred asset, the transferred asset continues to be recognised in its entirety and the consideration received is recognised as a liability.

*Derecognition of a financial asset without any change in the contractual terms*

The asset is derecognised if the contractual rights to cash flows from the financial asset are expired or the related financial asset and all risks and rewards of ownership of the asset are transferred to another party.

Except for equity instruments measured at FVOCI, the total amount consisting of the gain or loss arising from the difference between the book value and the amount obtained and any accumulated gain directly accounted in equity shall be recognised in profit or loss.

A financial liability (or a part of a financial liability) shall be removed from the statement of financial position when, and only when, it is extinguished—i.e. when the obligation specified in the contract is discharged or cancelled or expires.

**Reclassification of financial instruments**

It shall be reclassified all affected financial assets based on classification principles of IFRS 9 when, and only when, it is changed the business model for managing financial assets.

**Restructuring and refinancing of financial instruments**

It may be changed the original contractual terms of a loan (maturity, repayment structure, guarantees and sureties) which were previously signed, in case the loan cannot be repaid or if a potential payment difficulty is encountered based on the new financing power and structure of the borrower.

Restructuring is to change the financial terms of existing loans in order to facilitate the payment of debt. Refinancing is granting a new loan which will cover either the principal or the interest payment in whole or in part of one or a few existing loans due to the anticipated financial difficulty which the customer or group encounter currently or will encounter in the future.

Changes in the original terms of a credit risk can be made in the current contract or through a new contract.

**2.16 Repurchase and Resale Transactions**

The Group enters into sales of securities under agreements to repurchase such securities at a fixed price at a fixed future date. Such securities, which have been sold subject to a repurchase agreement (‘repos’), are recognized in the balance sheet and are measured in accordance with the accounting policy of the security portfolio which they are part of. The counterparty liability for amounts received under these agreements is included in obligations under repurchase agreements. The difference between sale and repurchase price is treated as interest expense and accrued over the life of the repurchase agreements using the effective interest method.

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**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**2.17 Impairment of Financial Assets**

The Bank recognize provisions for impairment in accordance with expected credit loss (ECL) model is used for instruments (such as bank deposits, loans and leasing receivables) carried at amortized cost and FVOCI, and in addition, credit commitments, and financial guarantee contracts.

The guiding principle of the ECL model is to reflect the general outlook of the increase or improvement in credit risk of financial instruments. The amount of ECLs defined as loss provision or provision depends on the degree of increase in credit risk since the loan was first issued.

Within the scope of IFRS 9 Financial Instruments, three basic factors regarding the measurement of expected credit loss are taken into consideration. These,

(a) the amount weighted according to the neutrality and probabilities determined by evaluating the possible outcome range

(b) time value of money

(c) reasonable and supportable information on past events, current conditions and forecasts of future economic conditions that can be obtained without incurring excessive cost or effort as of at the reporting date

Taking into consideration these three factors, the Bank's historical data is modeled and the expected loss amount is calculated for each loan. Since the expected loss represents the future value, the discounting factor and the present value of this amount are calculated.

In order to reflect the changes in credit risk since the initial recognition of credit risk, the loss provision is updated at each reporting date in which the expected loss calculations are performed.

The Bank assesses whether there has been a significant increase in credit risk in the financial instrument for the first time since it was included in the financial statements. In making this assessment, the Bank uses the change in default risk during the expected life of the financial instrument. To make this assessment, the Bank compares default risk related to the financial instrument as of the reporting date and the default risk related to the financial instrument for the first time in the financial statements, and is reasonable, which can be obtained without incurring excessive costs or efforts, which is reasonable indication of significant increases in credit risk since its introduction for the first time. and supportable information.

In the IFRS 9 impairment, a 3-step approach is used in which the credit risk level increases at each stage:

Stage 1: It refers to all accounts that have not shown any deterioration in credit quality since the loan was issued. All accounts defined as having low credit risk will be classified as Stage 1 without periodically checking whether there is a significant increase in credit risk. A 12-month provision calculation is performed for all accounts classified in Stage 1.

Stage 2: Refers to all accounts showing significant deterioration in credit quality since the loan was issued. For all accounts classified in Stage 2, lifetime provision calculations are performed.

Stage 3: Refers to all impaired assets. For all accounts classified in Stage 3, lifetime provision calculations are performed.

Financial assets in Stage 3 might be evaluated individually in the current provision calculations made by the Bank, and final evaluation is made by the Board of Directors together with their justifications. In this context, the Bank has allocated additional provisions for customers whose impacts are considered to be high, by making individual valuations in the calculation of expected credit losses.

IFRS requires a 12-month compensation for all loans in stage 1, and a lifetime provision for all remaining loans.

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**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**2.17 Impairment of Financial Assets (continued)**

**Significant Increase in Credit Risk**

If the customers classified as Stage 1 meet the following criteria, it has been decided by the Bank to be classified under Stage 2:

- The number of delay days of the customer is over 30,
- Restructuring of the debtor with financial difficulties by granting concession,
- Customer has Close Monitoring criteria,
- There is a 35 percent or more decrease in the quantitative score to be calculated by considering the end-of-year financial statements for the customer every year, and the score in question drops below 40 (a significant increase criterion in credit risk).

Customers are periodically evaluated (at least once a year) and their ratings are updated in order to evaluate the criterion of significant increase in credit risk. The evaluation period is shortened for the borrowers who received a significant deterioration in credit risk during the year.

Classification criteria under Stage 2 work for all bank customers, in addition, in case of negative market intelligence, classification can be made under Stage 2. This process continues under IFRS 9. The classification rules determined within the scope of IFRS 9 work for all portfolios.

Treasury and Banks portfolios are among the low default portfolios, and it is decided by the Bank to classify the assets in this portfolio under Phase 1 until an opposite assessment is made.

For the numerical criteria related to the significant deterioration in the credit risk, the classification of the loans, the customer rating score calculated according to the credit rating model used within the bank has decreased by 35 percent and above, and the score in question falls below 40 determined by the Bank as the criterion of significant deterioration. In addition to these criteria, the restructuring made to the customer who has financial difficulties is used as a classification criterion under Stage 2.

**Definition of Default**

IFRS 9 Standard “When defining the default for the purpose of determining the business default risk according to IFRS 9, it uses a default definition consistent with the definition used for the credit risk management purposes of the related financial instrument and, if appropriate, takes into account qualitative indicators (e.g. financial commitments). However, unless the entity has reasonable and supportable information that reveals that default will occur when there is a longer delay, there is an otherwise demonstrable pre-acceptance that the default will not occur after the financial instrument expires after 90 days. The definition of default used for these purposes is applied consistently to all financial instruments unless information that proves that another definition of default is more appropriate for a particular financial instrument is available”. According to the article, the definition of default is used within the scope of modeling.

The definition of default used in the Bank is as follows:

- Customers with more than 90 days of delay (The number of customer delay days represents the highest number of delay days of the customer’s existing loans on the relevant reporting date.),
- Compensation of the letter of guarantee received by the bank for collateral,
- Customers considered to be at high risk by the bank.

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**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**2.17 Impairment of Financial Assets (continued)**

**12 Month Expected Loss**

12-month loan loss corresponds to some of the expected loan loss that may arise from the possible default status of the loan within 12 months of the reporting date.

**Lifetime Expected Loss**

Lifetime losses arise from all possible default events that may occur during the expected life span of the financial instrument after the reporting date. Life expectancy is related to the maturity of the financial instrument.

One of the risk parameters to be used in calculating the provision amounts to be set as per IFRS 9 is the Probability of Default (PD) information. Probability of Default refers to the possibility of a live loan falling into default. PD calculation is carried out by considering past data, current conditions and prospective macroeconomic expectations.

Specifically, while calculating PD, qualitative, quantitative scores, sector, bank degree and macro effect are taken into account. For the company whose quantitative evaluation is made, an objective score is produced between 0 and 100. The sector in which the company operates is determined in accordance with the NACE code (Statistical Classification of European Community Economic Activities; a reference resource for the purpose of producing and disseminating statistics on economic activities in Europe.).

After the qualitative and quantitative scores of the company are determined, the mentioned points are weighted according to the company scale and the company's score is calculated.

Banks, on the other hand, are ranked objectively by considering various criteria, namely capital, asset quality, liquidity, profitability, income-expenditure structure and capacity.

Finally, for the macro effect, a volatility index is calculated first, and then variables that act in parallel and play a role in the measurement of crisis probabilities before sudden financial shocks are identified. Afterwards, the index is created by weighting the determined variables according to the success rate.

The macro effect ultimately applied to the customer scores by the Bank is the macro note calculated on the company grade (non-macro score) calculated as a result of qualitative (partnership information, group of companies, etc.) and quantitative (liquidity, financial structure, profitability etc.) assessment of each customer. In line with the customer's score, corrections are applied. In this context, Turkey's economy made pioneering studies of vulnerability indicators for identifying crisis and some of the variables derived from various areas of the economy that have been identified by the Bank successfully predict in advance. This prediction has been accepted by the Bank as the threshold values are exceeded and the signal is produced starting at least 12 months before the crisis.

In order to obtain the macroeconomic score, which is calculated by considering the positive and negative scenarios as well as the base scenario value, values are calculated at a certain margin in accordance with the distribution of the series for positive and negative scenario values from the index values distributed between 0-100 and averaged over 12 months.

**2.18 Cash and Cash Equivalents**

For the purposes of the consolidated statement of cash flows, cash and cash equivalents comprise cash, deposits with banks and other financial institutions and other money market placements with an original maturity of three months or less.

**2.19 Borrowings**

All borrowings are initially recognized at the fair value of consideration received. After initial recognition interest-bearing borrowings are subsequently measured at amortized cost using the effective interest method. Gains or losses are recognized in the income statement when the liabilities are derecognized as well as through the amortization process.

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**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**2.20 Derivative Financial Instruments**

The Group enters into transactions with derivative instruments including currency swaps and forwards in the foreign exchange. Most of these derivative transactions are considered as effective economic hedges under the Group's risk management policies; however since they do not qualify for hedge accounting under the specific provisions of IFRS 9, they are treated as derivatives held-for-trading. Derivative financial instruments are initially recognized at fair value on the date a derivative contract is entered into and are subsequently remeasured at fair value at the end of each reporting period. The resulting gains or losses recognized in trading gain/loss account in profit or loss immediately.

**2.21 Employee Benefits – Defined Benefit Plans**

*Termination and Retirement Benefits:*

Under Turkish legislation and union agreements, lump sum payments are made to all employees who retire or whose employment is terminated without due cause. Such payments are based on number of years' service and final salary at the date of retirement or leaving.

International Accounting Standard No. 19 (revised) "Employee Benefits" ("IAS 19") has been applied in the accompanying financial statements. Future retirement payments are discounted to their present value at the balance sheet date at an interest rate determined as net of an expected inflation rate and an appropriate discount rate. This standard also allows the employee benefit liability to be reduced by anticipated forfeitures by eligible employees of their benefit. The retirement benefit obligation recognized in the statement of financial position represents value of the defined benefit obligation.

Actuarial gains and losses arising from experience adjustments and changes in actuarial assumptions were directly charged to statement of income in prior periods. As per revised IAS 19, actuarial gains/losses are recognized under shareholders' equity starting from 1 January 2013.

**2.22 Provisions**

Provisions are recognized when the Group has a present obligation as a result of a past event, it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and a reliable estimate can be made of the amount of the obligation. The expense relating to any provision is presented in the income statement net of any reimbursement. If the effect of the time value of money is material, provisions are determined by discounting the expected future cash flows at a pre-tax rate that reflects current market assessments of the time value of money and, where appropriate, the risks specific to the liability.

**2.23 Leases**

Based on IFRS 16, at the commencement date, the lease liability is measured at the present value of the lease payments that are not paid at that date. The lease payments shall be discounted using the alternative borrowing interest rate.

After the commencement date, the lease liability is measured by increasing the carrying amount to reflect interest on the lease liability, reducing the carrying amount to reflect the lease payments made; and remeasuring the carrying amount to reflect any reassessment or lease modifications, or to reflect revised in-substance fixed lease.

Interest on the lease liability in each period during the lease term shall be the amount that produces a constant periodic rate of interest on the remaining balance of the lease liability.

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**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**2.23 Leases (continued)**

After the commencement date, the lease liability is remeasured to reflect changes to the lease payments. The amount of the remeasurement of the lease liability is recognised as an adjustment to the right-of-use asset.

The lease liability is remeasured by discounting the revised lease payments using a revised discount rate, if either there is a change in the lease term or there is a change in the assessment of an option to purchase the underlying asset. However, if there is a change in future lease payments resulting from a change in an index or a rate used to determine those payments or if there is a change in the amounts expected to be payable under a residual value guarantee, an unchanged discount rate is used.

For a lease modification that is not accounted for as a separate lease, at the effective date of the lease modification, the lease liability is remeasured by discounting the revised lease payments using a revised discount rate. The revised discount rate is determined as the alternative borrowing interest rate at the effective date of the modification. The carrying amount of the right-of-use asset is decreased to reflect the partial or full termination of the lease for lease modifications that decrease the scope of the lease. Any gain or loss relating to the partial or full termination of the lease is recognised in profit or loss. A corresponding adjustment to the right-of-use asset is made for all other lease modifications.

**Bank as a lessee**

The “IFRS 16 Leases” Standard removes financial lease and operational lease distinction for lessees and introduces a single accounting model for all leasing transactions. According to the standard, the lessees reflect a “asset that gives the right to use” and a “lease obligation” to the financial statements at the date when the lease actually begins. The initial cost of the asset that gives the right to use is measured by deducting the lease incentives from the sum of the lease obligation and the initial direct costs incurred by the lessees. The cost method is used for the measurements after the beginning of the lease. In this method, the asset that gives the right to use is measured by deducting the accumulated depreciation and accumulated deprecation provisions from the cost value. The lease obligation is initially measured at the present value of the lease payments to be made during the lease period. In subsequent measurements, the book value of the liability is increased to reflect the interest on the lease obligation and decreased to reflect the lease payments made. IFRS 16 has made exemptions for leases of 12 months or less and leases related to low value assets.

The Bank, which is a lessee in financial leasing transactions, accounts for all lease transactions longer than 12 months as assets and liabilities in the statement of financial position. Depreciation expense related to the leased asset and interest expense in lease payments are reported in the income statement. The lease obligation was initially measured at the present value of the lease payments to be made during the lease period using the Bank's TRY alternative source cost.

**The bank as the lessor**

According to the “IFRS 16 Leases” Standard, financial lease and operational lease distinction continues for the lessor. If the lessor transfers the significant risks and benefits arising from ownership of the asset subject to the lease to the lessee, he will classify it as a financial lease. Other leases will be classified as operational leases. The receivables that arise from leasing the assets of the Bank, which are not included in financial lease transactions and which are not used in banking transactions, are followed up in the receivables from the leasing transaction and are accounted on an accrual basis.

As of the balance sheet date, the Bank does not have any investment properties (31 December 2020: None).

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**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**2.24 Interest Income and Expense Recognition**

*Interest Income and Expense*

Interest income and expense are recognized on an accrual basis using the effective interest method. The effective interest method is a method of calculating the amortized cost of a financial asset or a financial liability (or group of financial assets or financial liabilities) and of allocating the interest income or interest expense over the relevant period. The effective interest rate is the rate that exactly discounts estimated future cash payments or receipts through the expected life of the financial instrument or, when appropriate, throughout the period to the next reprising date. When calculating the effective interest rate, the Group estimates cash flows considering all contractual terms of the financial instrument (for example, prepayment) but does not consider future credit losses. The calculation includes all fees paid or received between parties to the contract that are an integral part of the effective interest rate, transaction costs, and all other premiums or discounts.

*Fee and Commission Income*

Fee and commission income and expenses that are integral to the effective interest rates on a financial asset or liability are included in the measurement of the effective interest rate. All other fee and commission income and expenses are recorded as income or expense on the date of collection or payment.

*Net Trading Income*

Net trading income includes gains and losses arising from disposals of financial assets at fair value through profit or loss, FVOCI and from trading derivatives.

*Dividend Income*

Dividend income is recognized in the statement of income when the right to receive payment is established.

**2.25 Income Tax**

Turkish tax legislation does not permit a parent company and its subsidiaries to file a consolidated tax return. Therefore, provisions for taxes, as reflected in the accompanying consolidated financial statements, have been calculated on a separate-entity basis.

Income tax expense represents the sum of the tax currently payable and deferred tax.

*Current tax*

The tax currently payable is based on taxable profit for the year. Taxable profit differs from profit as reported in the income statement because it excludes items of income or expense that are taxable or deductible in other years and it further excludes items that are never taxable or deductible. The Group's liability for current tax is calculated using tax rates that have been enacted or substantively enacted by the balance sheet date.

According to the Temporary Article 13 added to the Corporate Tax Law No: 5520 and with the Article 11 of the Law on the Procedure of Collection of Public Claims and the Law on the Amendment of Some Laws, which entered into force after being published in the Official Gazette dated 22 April 2021 and numbered 31462, the Corporate Tax rate will be applied as 25% for the corporate earnings for the 2021 taxation period and 23% for the corporate earnings for the 2022 taxation period. This change will be valid for the taxation of corporate earnings for the periods starting from 1 January 2021, starting with the declarations that must be submitted as of 1 July 2021. According to the new law, temporary tax calculations for the current period have been made by 25%. The corporate tax rate is applied to the tax base to be found as a result of adding the non-deductible expenses to the commercial earnings of the companies, the exemption (such as the participation earnings exemption) and the deduction of the deductions in the tax laws. No further tax is paid if the profit is not distributed. Non-resident corporations' income through a permanent establishment or permanent representative in Turkey and dividends paid to companies' resident in Turkey (dividends) not subject to withholding. Dividend payments made to individuals and institutions other than these are subject to 10% withholding tax. Addition of profit to capital is not considered as profit distribution and withholding tax is not applied.

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**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**2.25 Income Tax (continued)**

*Deferred tax*

Deferred tax is recognized on temporary differences between the carrying amounts of assets and liabilities in the financial statements and the corresponding tax bases which is used in the computation of taxable profit. Deferred tax liabilities are generally recognized for all taxable temporary differences and deferred tax assets are recognized for all deductible temporary differences to the extent that it is probable that taxable profits will be available against which those deductible temporary differences can be utilized. Such deferred tax assets and liabilities are not recognized if the temporary difference arises from goodwill or from the initial recognition (other than in a business combination) of other assets and liabilities in a transaction that affects neither the taxable profit nor the accounting profit.

Deferred tax liabilities are recognized for taxable temporary differences associated with investments in subsidiaries and associates, and interests in joint ventures, except where the Group is able to control the reversal of the temporary difference and it is probable that the temporary difference will not reverse in the foreseeable future. Deferred tax assets arising from deductible temporary differences associated with such investments and interests are only recognized to the extent that it is probable that there will be sufficient taxable profits against which to utilize the benefits of the temporary differences and they are expected to reverse in the foreseeable future.

The carrying amount of deferred tax assets is reviewed at each balance sheet date and reduced to the extent that it is no longer probable that sufficient taxable profits will be available to allow all or part of the asset to be recovered.

Deferred tax assets and liabilities are measured at the tax rates that are expected to apply in the period in which the liability is settled or the asset realized, based on tax rates (and tax laws) that have been enacted or substantively enacted by the balance sheet date. The measurement of deferred tax liabilities and assets reflects the tax consequences that would follow from the manner in which the Group expects, at the reporting date, to recover or settle the carrying amount of its assets and liabilities.

Deferred tax assets and liabilities are offset when there is a legally enforceable right to set off current tax assets against current tax liabilities and when they relate to income taxes levied by the same taxation authority and the Group intends to settle its current tax assets and liabilities on a net basis.

*Current and deferred tax for the period*

Current and deferred tax are recognized as an expense or income in profit or loss, except when they relate to items that are recognized outside profit or loss (whether in other comprehensive income or directly in equity), in which case the tax is also recognized outside profit or loss, or where they arise from the initial accounting for a business combination. In the case of a business combination, the tax effect is taken into account in calculating goodwill or determining the excess of the acquirer's interest in the net fair value of the acquiree's identifiable assets, liabilities and contingent liabilities over cost.

**2.26 Fiduciary Assets**

Assets held by the Group in a fiduciary, agency or custodian capacity for its customers are not included in the balance sheet, since such items are not treated as assets of the Group. The Bank has no fiduciary assets.

**2.27 Segment Reporting**

A business segment is a group of assets and operations engaged in providing products or services that are subject to risks and returns that are different from those of other business segments. A geographical segment is engaged in providing products and services within a particular economic environment that are subject to risks and return that are different from those of segments operating in another economic environment.

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**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**2.28 Standards and Interpretations Issued But Not Yet Effective**

***Standards issued but not yet effective and not early adopted***

A number of new standards, interpretations of and amendments to existing standards are not effective at reporting date and earlier application is permitted; however the Group has not early adopted are as follows.

**COVID-19-Related Rent Concessions beyond 30 June 2021 (the 2021 amendment)**

IASB has extended the practical expedient by 12 months – permitting lessees to apply it to rent concessions for which any reduction in lease payments affects only payments originally due on or before 30 June 2022. The original amendment was issued in May 2020 to make it easier for lessees to account for covid-19-related rent concessions, such as rent holidays and temporary rent reductions, while continuing to provide useful information about their leases to investors.

The amendment is effective for annual reporting periods beginning on or after 1 April 2021. Lessees are permitted to apply it early, including in financial statements not authorised for issue as of 31 March 2021 the date of publication of this amendment,. In other words, if the financial statements for the accounting periods before the date of publication of the amendment have not yet been issued, it is possible to apply this amendment for the relevant financial statements. The 2021 amendments are applied retrospectively with the cumulative effect of initially applying it being recognised in opening retained earnings.

The original version of the practical expedient was, and remains, optional. However, the 2021 amendments are, in effect, not optional. This is because a lessee that chose to apply the practical expedient introduced by the 2020 amendments has to consistently apply the extension to eligible contracts with similar characteristics and in similar circumstances.

This means that lessees will need to reverse previous lease modification accounting if a rent concession was ineligible for the original practical expedient under the 2020 amendments but becomes eligible as a result of the extension.

**Reference to the Conceptual Framework (Amendments to IFRS 3)**

In May 2020, IASB issued Reference to the Conceptual Framework, which made amendments to IFRS 3 Business Combinations.

The amendments updated IFRS 3 by replacing a reference to an old version of the Board’s Conceptual Framework for Financial Reporting with a reference to the latest version, which was issued in March 2018.

The Group shall apply these amendments for annual periods beginning on or after 1 January 2022 with earlier application permitted.

**Property, Plant and Equipment—Proceeds before Intended Use (Amendments to IAS 16)**

In May 2020, IASB issued Property, Plant and Equipment—Proceeds before Intended Use, which made amendments to IAS 16 Property, Plant and Equipment. The amendments prohibit a company from deducting from the cost of property, plant and equipment amounts received from selling items produced while the company is preparing the asset for its intended use. Instead, a company will recognise such sales proceeds and related cost in profit or loss.

The amendments improve transparency and consistency by clarifying the accounting requirements—specifically, the amendments prohibit a company from deducting from the cost of property, plant and equipment amounts received from selling items produced while the company is preparing the asset for its intended use. Instead, a company will recognise such sales proceeds and related cost in profit or loss.

The Group shall apply these amendments for annual periods beginning on or after 1 January 2022 with earlier application permitted. The amendments apply retrospectively, but only to items of Property, Plant and Equipment made available for use on or after the beginning of the earliest period presented in the financial statements in which the company first applies the amendments.

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**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**2.28 Standards and Interpretations Issued But Not Yet Effective (continued)**

***Standards issued but not yet effective and not early adopted (continued)***

**Onerous Contracts—Cost of Fulfilling a Contract (Amendments to IAS 37)**

In May 2020, IASB issued Onerous Contracts—Cost of Fulfilling a Contract, which made amendments to IAS 37 Provisions, Contingent Liabilities and Contingent Assets.

The amendments specify which costs an entity includes in determining the cost of fulfilling a contract for the purpose of assessing whether the contract is onerous.

IASB developed amendments to IAS 37 to clarify that for the purpose of assessing whether a contract is onerous, the cost of fulfilling the contract includes both the incremental costs of fulfilling that contract and an allocation of other costs that relate directly to fulfilling contracts.

The Group shall apply these amendments for annual periods beginning on or after 1 January 2022 with earlier application permitted. At the date of initial application, the cumulative effect of applying the amendments is recognised as an opening balance adjustment to retained earnings or other component of equity, as appropriate. The comparatives are not restated.

**IFRS 17 Insurance Contracts**

On 18 May 2017, IASB issued IFRS 17 Insurance Contracts. This first truly globally accepted standard for insurance contracts will help investors and others better understand insurers' risk exposure, profitability and financial position. IFRS 17 replaces IFRS 4, which was brought in as an interim Standard in 2004. IFRS 4 has given companies dispensation to carry on accounting for insurance contracts using national accounting standards, resulting in a multitude of different approaches. As a consequence, it is difficult for investors to compare and contrast the financial performance of otherwise similar companies. IFRS 17 solves the comparison problems created by IFRS 4 by requiring all insurance contracts to be accounted for in a consistent manner, benefiting both investors and insurance companies. Insurance obligations will be accounted for using current values – instead of historical cost. The information will be updated regularly, providing more useful information to users of financial statements. IFRS 17 has an effective date of 1 January 2023 but companies can apply it earlier.

The Group does not expect that application of IFRS 17 will have significant impact on its consolidated financial statements.

**Initial Application of IFRS 17 and IFRS 9—Comparative Information (Amendment to IFRS 17)**

In December 2021, IASB issued Initial Application of IFRS 17 and IFRS 9—Comparative Information (Amendment to IFRS 17). The amendment is a transition option relating to comparative information about financial assets presented on initial application of IFRS 17. The amendment is aimed at helping entities to avoid temporary accounting mismatches between financial assets and insurance contract liabilities, and therefore improve the usefulness of comparative information for users of financial statements. IFRS 17 incorporating the amendment is effective for annual reporting periods beginning on or after 1 January 2023.

The Group does not expect that application of these amendments to IFRS 17 will have significant impact on its consolidated financial statements.

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**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**2.28 Standards and Interpretations Issued But Not Yet Effective**

*Standards issued but not yet effective and not early adopted*

**Classification of Liabilities as Current or Non-current (Amendments to IAS 1)**

On 23 January 2020, IASB issued Classification of Liabilities as Current or Non-Current which amends IAS 1 Presentation of Financial Statements to clarify its requirements for the presentation of liabilities in the statement of financial position.

The amendments clarify one of the criteria in IAS 1 for classifying a liability as non-current—that is, the requirement for an entity to have the right to defer settlement of the liability for at least 12 months after the reporting period.

The amendments include:

- (a) Specifying that an entity’s right to defer settlement must exist at the end of the reporting period;
- (b) Clarifying that classification is unaffected by management’s intentions or expectations about whether the entity will exercise its right to defer settlement;
- (c) Clarifying how lending conditions affect classification; and
- (d) Clarifying requirements for classifying liabilities an entity will or may settle by issuing its own equity instruments.

The Group shall apply retrospectively these amendments for annual periods beginning on or after 1 January 2022 with earlier application permitted. However, according to the amendment published on 15 July 2020, IASB decided to defer the effective date of IAS 1 until 1 January 2023.

The Group does not expect that application of these amendments to IAS 1 will have significant impact on its consolidated financial statements.

**Disclosure of Accounting Policies (Amendments to IAS 1 and IFRS Practice Statement 2)**

IASB has issued amendments to IAS 1 Presentation of Financial Statements and an update to IFRS Practice Statement 2 Making Materiality Judgements to help companies provide useful accounting policy disclosures on 12 February 2021.

The key amendments to IAS 1 include:

- requiring companies to disclose their material accounting policies rather than their significant accounting policies;
- clarifying that accounting policies related to immaterial transactions, other events or conditions are themselves immaterial and as such need not be disclosed; and
- clarifying that not all accounting policies that relate to material transactions, other events or conditions are themselves material to a company’s financial statements.

IASB also amended IFRS Practice Statement 2 to include guidance and two additional examples on the application of materiality to accounting policy disclosures.

The amendments are consistent with the refined definition of material previously:

“Accounting policy information is material if, when considered together with other information included in an entity’s financial statements, it can reasonably be expected to influence decisions that the primary users of general purpose financial statements make on the basis of those financial statements”.

The amendments are effective from 1 January 2023 but companies can apply it earlier.

The Group does not expect that application of these amendments to Amendments to IAS 1 and IFRS Practice Statement 2).

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**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**2.28 Standards and interpretations issued but not yet effective (continued)**

***Standards issued but not yet effective and not early adopted (continued)***

**Definition of Accounting Estimates (Amendments to IAS 8)**

The amendments introduce a new definition for accounting estimates: clarifying that they are monetary amounts in the financial statements that are subject to measurement uncertainty which is issued by IASB on 12 February 2021.

The amendments also clarify the relationship between accounting policies and accounting estimates by specifying that a company develops an accounting estimate to achieve the objective set out by an accounting policy.

Developing an accounting estimate includes both:

- selecting a measurement technique (estimation or valuation technique) – e.g. an estimation technique used to measure a loss allowance for expected credit losses when applying IFRS 9 Financial Instruments; and
- choosing the inputs to be used when applying the chosen measurement technique – e.g. the expected cash outflows for determining a provision for warranty obligations when applying IAS 37 Provisions, Contingent Liabilities and Contingent Assets.

The effects of changes in such inputs or measurement techniques are changes in accounting estimates. The definition of accounting policies remains unchanged.

The amendments are effective for periods beginning on or after 1 January 2023, with earlier application permitted, and will apply prospectively to changes in accounting estimates and changes in accounting policies occurring on or after the beginning of the first annual reporting period in which the company applies the amendments.

**Deferred Tax Related to Assets and Liabilities Arising from a Single Transaction – Amendments to IAS 12 Income Taxes**

In May 2021 IASB issued *Deferred Tax related to Assets and Liabilities arising from a Single Transaction*, which amended IAS 12 Income Taxes.

The amendments to IAS 12 Income Taxes clarify how companies should account for deferred tax on certain transactions – e.g. leases and decommissioning provisions.

The amendments narrow the scope of the initial recognition exemption so that it does not apply to transactions that give rise to equal and offsetting temporary differences. As a result, companies will need to recognise a deferred tax asset and a deferred tax liability for temporary differences arising on initial recognition of a lease and a decommissioning provision.

The amendments clarify that the exemption does not apply to transactions such as leases and decommissioning obligations. These transactions give rise to equal and offsetting temporary differences.

For leases and decommissioning liabilities, the associated deferred tax asset and liabilities will need to be recognised from the beginning of the earliest comparative period presented, with any cumulative effect recognised as an adjustment to retained earnings or other components of equity at that date. If a company previously accounted for deferred tax on leases and decommissioning liabilities under the net approach, then the impact on transition is likely to be limited to the separate presentation of the deferred tax asset and the deferred tax liability.

The amendments are effective for annual reporting periods beginning on or after 1 January 2023. Earlier application is permitted.

The Group does not expect that application of these amendments to Amendments to IAS 12 will have significant impact on its consolidated financial statements.

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**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**2.28 Standards and interpretations issued but not yet effective (continued)**

*Standards issued but not yet effective and not early adopted (continued)*

*Annual Improvements to IFRS Standards 2018–2020*

**Improvements to IFRSs**

IASB issued Annual Improvements to IFRSs - 2018–2020 Cycle for applicable standards in May 2020. The amendments are effective as of 1 January 2022. Earlier application is permitted. The Group does not expect that application of these improvements to IFRSs will have significant impact on its consolidated financial statements.

*IFRS 1 First-time Adoption of International Financial Reporting Standards*

This amendment simplifies the application of IFRS 1 for a subsidiary that becomes a first-time adopter of IFRS Standards later than its parent – i.e. if a subsidiary adopts IFRS Standards later than its parent and applies IFRS 1.D16(a), then a subsidiary may elect to measure cumulative translation differences for all foreign operations at amounts included in the consolidated financial statements of the parent, based on the parent's date of transition to IFRS Standards. This amendment will ease transition to IFRS Standards for subsidiaries applying this optional exemption by i) reducing undue costs; and ii) avoiding the need to maintain parallel sets of accounting records.

*IFRS 9 Financial Instruments*

This amendment clarifies that – for the purpose of performing the ‘10 per cent test’ for derecognition of financial liabilities – in determining those fees paid net of fees received, a borrower includes only fees paid or received between the borrower and the lender, including fees paid or received by either the borrower or lender on the other's behalf.

*IFRS 16 Leases, Illustrative Example 13*

The amendment removes the illustration of payments from the lessor relating to leasehold improvements. As currently drafted, this example is not clear as to why such payments are not a lease incentive. It will help to remove the potential for confusion in identifying lease incentives in a common real estate fact pattern.

*IAS 41 Agriculture*

This amendment removes the requirement to exclude cash flows for taxation when measuring fair value, thereby aligning the fair value measurement requirements in IAS 41 with those in IFRS 13 Fair Value Measurement. The amendments provide the flexibility to use either, as appropriate, in line with IFRS 13.

**Amendments are effective on 1 January 2021**

1-) Interest Rate Benchmark Reform – Phase 2 – Amendments to IFRS 9 Financial Instruments, IAS 39 Financial Instruments: Recognition and Measurement, IFRS 7 Financial Instruments: Disclosures, IFRS 4 Insurance Contracts and IFRS 16 Leases

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**3. SEGMENT INFORMATION**

***Business segments***

The Group is organised into two main business segments, Treasury and Investment Banking which are organized and managed separately according to the nature of the products and services provided.

The segment results for the year ended 31 December 2021 are as follows:

	<b>Treasury</b>	<b>Investment Banking</b>	<b>Undistributed</b>	<b>Eliminations</b>	<b>Group</b>
Net interest income	805,685	573,867	(2,456)	-	1,377,096
Net fees and commissions income	(15,959)	51,234	13,510	-	48,785
Foreign exchange (losses)	3,400	152,133	-	-	155,533
Other operating income	5,858	67,293	-	-	73,151
Other operating expenses	19,594	(19,381)	(187,900)	-	(187,687)
Provisions for impairment of loans and other assets	-	(455,158)	-	-	(455,158)
Income from associates	-	4,390	-	-	4,390
<b>Profit/(loss) before income tax</b>	<b>818,578</b>	<b>374,378</b>	<b>(176,846)</b>	<b>-</b>	<b>1,016,110</b>
Income tax	-	-	(198,556)	-	(198,556)
<b>Net profit/(loss)</b>	<b>818,578</b>	<b>374,378</b>	<b>(375,402)</b>	<b>-</b>	<b>817,554</b>

The segment assets and liabilities at 31 December 2021 are as follows:

	<b>Treasury</b>	<b>Investment Banking</b>	<b>Undistributed</b>	<b>Eliminations</b>	<b>Group</b>
<b>Assets and Liabilities</b>					
Segment assets	11,432,585	36,694,837	241,955	(3,832)	48,365,545
Investment in associates	-	14,571	-	-	14,571
<b>Total assets</b>	<b>11,432,585</b>	<b>36,709,408</b>	<b>241,945</b>	<b>(3,832)</b>	<b>48,380,116</b>
Segment liabilities	708,282	42,813,258	4,862,408	(3,832)	48,380,116
<b>Total liabilities and equity</b>	<b>708,282</b>	<b>42,813,258</b>	<b>4,862,408</b>	<b>(3,832)</b>	<b>48,380,116</b>

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**3. SEGMENT INFORMATION (continued)**

**Business segments (continued)**

The segment results for the year ended 31 December 2020 are as follows:

	<b>Treasury</b>	<b>Investment Banking</b>	<b>Undistributed</b>	<b>Eliminations</b>	<b>Group</b>
Net interest income	399,466	340,869	(3,016)	-	737,319
Net fees and commissions income	(10,521)	30,781	363	-	20,623
Foreign exchange (losses)	3,400	64,203	-	-	67,604
Other operating income	5,858	134,506	-	-	140,364
Other operating expenses	(57,540)	(13,825)	(144,065)	-	(215,430)
Provisions for impairment of loans and other assets	-	(132,960)	-	-	(132,960)
Income from associates	-	5,000	-	-	5,000
<b>Profit/(loss) before income tax</b>	<b>340,663</b>	<b>428,574</b>	<b>(146,718)</b>	<b>-</b>	<b>622,519</b>
Income tax	-	-	(118,868)	-	(118,868)
<b>Net profit/(loss)</b>	<b>340,663</b>	<b>428,574</b>	<b>(265,586)</b>	<b>-</b>	<b>503,651</b>

The segment assets and liabilities at 31 December 2020 are as follows:

	<b>Treasury</b>	<b>Investment Banking</b>	<b>Undistributed</b>	<b>Eliminations</b>	<b>Group</b>
<b>Assets and Liabilities</b>					
Segment assets	7,738,409	20,178,423	136,969	(3,759)	28,050,042
Investment in associates	-	26,997	-	(5,000)	21,997
<b>Total assets</b>	<b>7,738,409</b>	<b>20,205,420</b>	<b>136,969</b>	<b>(8,759)</b>	<b>28,072,039</b>
Segment liabilities	203,897	24,013,212	3,859,930	(5,000)	28,072,039
<b>Total liabilities and equity</b>	<b>203,897</b>	<b>24,013,212</b>	<b>3,859,930</b>	<b>(5,000)</b>	<b>28,072,039</b>

**Geographical segments**

The Group's operations are mainly conducted in Turkey. Accordingly, geographical segment information is not presented.

**4. CASH AND CASH EQUIVALENTS**

	<b>31 December 2021</b>	<b>31 December 2020</b>
<b>Cash on hand</b>	<b>24</b>	<b>10</b>
Demand deposits - Turkish Lira	763	4,436
Demand deposits - Foreign Currency	31,690	25,181
Time deposits	3,240,650	3,526,071
<b>Deposits with banks and other financial institutions</b>	<b>3,273,103</b>	<b>3,555,688</b>

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**4. CASH AND CASH EQUIVALENTS (continued)**

<b>Cash and deposits with banks and other financial institutions</b>	<b>3,273,127</b>	<b>3,555,698</b>
Balances with Central Bank	2,026	1,115
Money market placements	993,282	1,500,739
Less: Interest accruals	(9,391)	(8,460)
Expected credit loss	3,251	8,287
<b>Cash and cash equivalents in the statement of cash flows</b>	<b>4,262,295</b>	<b>5,057,379</b>

The effective interest rates on deposits and placements are as follows:

	31 December 2021		31 December 2020	
	Effective interest rate		Effective interest rate	
	Turkish Lira	Foreign Currency	Turkish Lira	Foreign Currency
Deposits with banks and other financial institutions (*)	20.61%	0.56%	18.04%	1.39%
Money Market Placements	14.50%	-	17.98%	-

(\*) Interest rates calculated from weighted average of placements as of 31 December 2021 and 31 December 2020.

**5. FINANCIAL ASSETS AT FAIR VALUE THROUGH PROFIT AND LOSS**

	31 December 2021	31 December 2020
Equity instruments (*)	220,867	119,725
<b>Total financial assets at fair value through profit or loss</b>	<b>220,867</b>	<b>119,725</b>

(\*) The account includes fund investments. Among these investments there are TKYB Sermaye Fonu, a sub-fund of the Türkiye Kalkınma Fonu, of which the Bank is the founder and Yenilikçi İleri Teknoloji Fonu and Kalkınma Katılım Girişim Sermayesi Fonu, which was established by its subsidiary Kalkınma Girişim Portföy Yönetimi Anonim Şirketi. Since they are newly established funds and their investment values are not significant in the financial statements, costs of these investments are assumed to reflect their fair values.

**6. LOANS AND ADVANCES TO FINANCIAL INSTITUTIONS**

As of 31 December 2021, majority of loans and advances to financial institutions' interest rates ranging between 1.96%-5.99% (2020: 1.99%-3.88%).

	31 December 2021	31 December 2020
<b>Loans and advances to financial institutions</b>		
<b>Financial Institution Originated</b>		
Industrial and Commercial Bank of China Originated Loan	5,304,032	3,005,260
Council of Europe Development Bank Originated Loans	1,438,089	1,528,419
World Bank Originated Loans	935,906	-
TKYB sourced loans	300,231	-
Other	148,572	-
Expected credit losses on loans and advances to banks	(25,054)	(20,709)
<b>Total loans and advances to financial institutions</b>	<b>8,101,776</b>	<b>4,512,970</b>

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**6. LOANS AND ADVANCES TO FINANCIAL INSTITUTIONS (continued)**

The credit quality analysis of loans and advances to banks is as follows as of 31 December 2021:

	2021		
	<u>Stage 1</u>	<u>Stage 2</u>	<u>Stage 3</u>
Stage 1: Low-fair risk	8,126,830	-	-
Stage 2: Watch list	-	-	-
Stage 3.1: Substandard	-	-	-
Stage 3.2: Doubtful	-	-	-
Stage 3.3: Loss	-	-	-
Loss allowance	(25,054)	-	-
<b>Total carrying amount</b>	<b>8,101,776</b>	-	-

The movement of loss allowances per asset class for loans and advances to financial institutions as of 31 December 2021 is as follows:

	31 December 2021		
	<u>Stage 1</u>	<u>Stage 2</u>	<u>Stage 3</u>
<b>Balances at 1 January 2021</b>	<b>(20,709)</b>	-	-
Transfer to Stage 1	-	-	-
Transfer to Stage 2	-	-	-
Transfer to Stage 3	-	-	-
Debt sales and write-offs	-	-	-
Recoveries and reversals	9,708	-	-
Provision for the period	(14,053)	-	-
<b>Balances at the end of the period</b>	<b>(25,054)</b>	-	-

The credit quality analysis of loans and advances to banks is as follows as of 31 December 2020:

	31 December 2020		
	<u>Stage 1</u>	<u>Stage 2</u>	<u>Stage 3</u>
Stage 1: Low-fair risk	4,533,679	-	-
Stage 2: Watch list	-	-	-
Stage 3.1: Substandard	-	-	-
Stage 3.2: Doubtful	-	-	-
Stage 3.3: Loss	-	-	-
Loss allowance	(20,709)	-	-
<b>Total carrying amount</b>	<b>4,512,970</b>	-	-

The movement of loss allowances per asset class for loans and advances to financial institutions as of 31 December 2020 is as follows:

	2020		
	<u>Stage 1</u>	<u>Stage 2</u>	<u>Stage 3</u>
<b>Balances at 1 January 2020</b>	<b>(17,539)</b>	-	-
Transfer to Stage 1	-	-	-
Transfer to Stage 2	-	-	-
Transfer to Stage 3	-	-	-
Debt sales and write-offs	-	-	-
Recoveries and reversals	-	-	-
Provision for the period	(3,170)	-	-
<b>Balances at the end of the period</b>	<b>(20,709)</b>	-	-

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**7. LOANS AND ADVANCES TO CUSTOMERS**

	<b>31 December 2021</b>	<b>31 December 2020</b>
<b>Financial Institution Originated</b>		
European Investment Bank Originated Loans	3,902,161	4,058,293
Islamic Development Bank Originated Loans	4,652,134	4,068,483
World Bank Originated Loans	4,206,484	681,869
Development Bank of Japan	1,599,080	261,266
KFW	479,845	552,672
Treasury Loans	991,134	242,281
<b>Bank Sourced</b>		
Other Bank Sourced Loans	9,972,860	4,611,178
Investment Loans	246,864	300,473
Restructured Loans	2,450,668	869,875
Personnel Loans	10	384
<b>Non-performing Loans</b>	<b>851,388</b>	<b>218,511</b>
<b>Total loans and advances to customers</b>	<b>29,352,557</b>	<b>15,865,285</b>
Expected credit losses on loans and advances to customers	(763,328)	(323,316)
<i>Stage 1</i>	(152,860)	(111,430)
<i>Stage 2</i>	(82,028)	(61,508)
<i>Stage 3</i>	(528,440)	(150,378)
<b>Total loans and advances to customers, (net)</b>	<b>28,589,299</b>	<b>15,541,969</b>

The credit quality analysis of loans and advances to customers is as follows as of 31 December 2021:

	<b>2021</b>		
	<b>Stage 1</b>	<b>Stage 2</b>	<b>Stage 3</b>
Stage 1: Low-fair risk	26,210,526	-	-
Stage 2: Watch list	-	2,290,713	-
Stage 3.1: Substandard	-	-	774,623
Stage 3.2: Doubtful	-	-	-
Stage 3.3: Loss	-	-	76,695
Loss allowance	(152,860)	(82,028)	(528,440)
<b>Total loans</b>	<b>26,057,666</b>	<b>2,208,685</b>	<b>322,878</b>

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**7. LOANS AND ADVANCES TO CUSTOMERS (continued)**

The movement of expected credit losses per asset class for cash loans and advances to customers as of 31 December 2021 is as follows:

	2021		
	<u>Stage 1</u>	<u>Stage 2</u>	<u>Stage 3</u>
Balances at 1 January 2021	111,430	61,508	150,378
Transfer to Stage 1	-	-	-
Transfer to Stage 2	(10,890)	13,224	(2,334)
Transfer to Stage 3	-	(230,263)	230,263
Debt sales and write-offs	-	-	-
Recoveries and reversals	(622)	(1,016)	(11,358)
Provision for the period	52,942	238,575	161,491
<b>Balances at the end of the period</b>	<b>152,860</b>	<b>82,028</b>	<b>528,440</b>

As of 31 December 2021, movement of non-performing cash loans (Stage 3) is as follows:

	<u>Principal</u>	<u>ECL</u>
Balance at 1 January 2021	218,511	150,378
Addition	655,270	391,754
Collection	(22,463)	(13,692)
Debt sales and write-offs	-	-
Effects of movements in exchange rates	-	-
<b>Balance at the end of the period</b>	<b>851,318</b>	<b>528,440</b>

**8. INVESTMENT SECURITIES**

	<u>31 December</u>	<u>31 December</u>
	<u>2021</u>	<u>2020</u>
<b>Debt and other instruments at FVOCI</b>		
Turkish Government bonds issued by the Turkish Government	2,680,438	895,881
Debt securities issued by corporations	1,235,784	54,671
Equity instruments – unlisted at cost (*)	16,478	14,990
Expected credit loss	(1)	(648)
<b>Investment securities at amortized cost</b>		
Turkish Government bonds (quoted)	3,012,392	1,717,342
Expected credit loss	(1,356)	(434)
<b>Total</b>	<b>6,943,735</b>	<b>2,681,802</b>

(\*) Unlisted equity securities classified as fair value through other comprehensive income securities represent the Group's equity shares in the companies, shares of which are not publicly traded. Consequently, they are reflected at cost less reserves for impairment, as a reliable estimate of their fair values could not be made.

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**8. INVESTMENT SECURITIES (Continued)**

**Movement of investment securities at amortized cost**

	<b>31 December 2021</b>	<b>31 December 2020</b>
Balance at the beginning of the period	1,716,908	1,064,246
Foreign currency differences on monetary assets	1,166,016	393,553
Purchases during the year	139,209	286,145
Disposals through sales and redemptions	(10,175)	(26,602)
Expected credit loss	(922)	(434)
Provision for impairment (-)	-	-
<b>Balance at the end of the period</b>	<b>3,011,036</b>	<b>1,716,908</b>

**Government bonds and treasury bills**

Government bonds and treasury bills pledged under repurchase agreements with customers included investment securities at fair value through other comprehensive income amount to TRY 522,914 (31 December 2020: TRY 205,332). Related liability is equal to TRY 629,707 as of 31 December 2021 (31 December 2020: TRY 205,378). As of 31 December 2021, government securities with carrying value amounting to TRY 192,716 (31 December 2020: TRY 63,299) in fair value through other comprehensive income securities portfolio are pledged to the Central Bank and the IMKB Takas ve Saklama Bankası Anonim Şirketi (Istanbul Stock Exchange Clearing and Custody Bank) for regulatory requirements and as a guarantee for stock exchange and money market operations.

**9. INVESTMENT IN ASSOCIATES**

Maksan Malatya Makina Sanayi A.Ş. is established in Malatya, Turkey in 1974 for manufacturing of transformers. The share and the voting power of the Bank is 31.14% (31 December 2020: 31.14%).

Financial information of the Group's associates is summarized below:

	<b>31 December 2021</b>	<b>31 December 2020<sup>(*)</sup></b>
Total assets	71,872	99,403
Total liabilities	(25,082)	(18,851)
<b>Net Assets</b>	<b>46,790</b>	<b>80,552</b>
<b>Group's share of associates' net assets</b>	<b>14,571</b>	<b>21,997</b>

(\*) It includes Türk Suudi Holding A.Ş..

The Group's share of associates' net assets includes net assets of Maksan Malatya Makina Sanayi A.Ş. amounting to TRY 14,471 (31 December 2020: TRY 10,181).

	<b>31 December 2021</b>	<b>31 December 2020</b>
Revenue	92,456	47,326
<b>Profit for the year</b>	<b>15,665</b>	<b>19,016</b>
<b>Group's share of associates' income / (loss)</b>	<b>4,390</b>	<b>5,000</b>

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**10. PREMISES AND EQUIPMENT**

<b>Current Period (31.12.2021)</b>	<b>Real Estates</b>	<b>Vehicles</b>	<b>Other</b>	<b>Total</b>
<b>Cost</b>				
Balance at the beginning of the period	17,552	739	25,055	43,346
Movements during the period				
-Additions	1,412	136	1,933	3,481
-Disposals (-)	(2,360)	-	(383)	(2,743)
- Recoveries from impairment	-	-	-	-
<b>Balance at the end of the period</b>	<b>16,604</b>	<b>875</b>	<b>26,605</b>	<b>44,084</b>
<b>Accumulated Depreciation</b>				
Balance at the beginning of the period	6,982	384	13,435	20,801
Movements during the period				
-Depreciation charge	3,699	206	4,159	8,064
-Disposals (-)	(1,693)	-	(211)	(1,904)
<b>Balance at the end of the period</b>	<b>8,988</b>	<b>590</b>	<b>17,383</b>	<b>26,961</b>
<b>Net book value at the end of the period</b>	<b>7,616</b>	<b>285</b>	<b>9,222</b>	<b>17,123</b>

<b>Period Period (31.12.2020)</b>	<b>Real Estates</b>	<b>Vehicles</b>	<b>Other</b>	<b>Total</b>
<b>Cost</b>				
Balance at the beginning of the period	135,507	739	23,826	160,072
Movements during the period				
-Additions	1,328	-	3,874	5,202
-Disposals (-)	(119,283)	-	(3,583)	(122,866)
- Recoveries from impairment	-	-	-	-
<b>Balance at the end of the period</b>	<b>17,552</b>	<b>739</b>	<b>24,117</b>	<b>42,408</b>
<b>Accumulated Depreciation</b>				
Balance at the beginning of the period	91,290	262	12,152	103,704
Movements during the period				
-Depreciation charge	4,822	122	4,129	9,073
-Disposals (-)	(89,130)	-	(3,784)	(92,914)
<b>Balance at the end of the period</b>	<b>6,982</b>	<b>384</b>	<b>12,497</b>	<b>19,863</b>
<b>Net book value at the end of the period</b>	<b>10,570</b>	<b>355</b>	<b>11,620</b>	<b>22,545</b>

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**11. INVESTMENT PROPERTIES**

As of 31 December 2021, The Group does not have any investment property held to lease (31 December 2020: None). There is no property rental income earned by the Group from its investment properties (31 December 2020: TRY 542).

**12. INTANGIBLE ASSETS**

	<b>31 December 2021</b>	<b>31 December 2020</b>
<b>Cost</b>		
Balance at the beginning of the year	26,707	8,945
Movements during the year	-	-
- Additions	8,103	17,762
- Disposal	-	-
<b>Balance at the end of the year</b>	<b>34,810</b>	<b>26,707</b>
<b>Accumulated Depreciation</b>		
Balance at the beginning of the year	8,963	6,860
Movements during the year	-	-
- Depreciation charge	3,972	2,103
- Disposal	-	-
<b>Balance at the end of the year</b>	<b>12,935</b>	<b>8,963</b>
<b>Net book value at the end of the year</b>	<b>21,875</b>	<b>17,744</b>

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**13. OTHER ASSETS**

	<b>31 December 2021</b>	<b>31 December 2020</b>
Prepaid fees and commissions	93,931	53,070
Non-current assets to be disposed	10,830	23,594
Sundry debtors	1,164	753
Other	1,355	1,169
Expected credit loss	(1)	(3)
<b>Total</b>	<b>107,279</b>	<b>78,583</b>

**14. FUNDS BORROWED AND SUBORDINATED LOANS**

**Funds borrowed**

	<b>31 December 2021</b>	<b>31 December 2020</b>
Borrowings	37,910,935	21,762,741
Funds	1,528,791	245,216
<b>Total</b>	<b>39,439,726</b>	<b>22,007,957</b>

<b>31 December 2021</b>	<b>Amount</b>	<b>Weighted Average Interest Rate</b>	<b>Maturity</b>
USD denominated borrowings	22,035,476	2.09%	2022-2031
EUR denominated borrowings	13,551,196	1.37%	2022-2059
TRY denominated borrowings	2,324,263	13.76%	2022-2035
<b>Total</b>	<b>37,910,935</b>		

<b>31 December 2020</b>	<b>Amount</b>	<b>Weighted Average Interest Rate</b>	<b>Maturity</b>
USD denominated borrowings	11,996,581	2.25%	2021-2024
EUR denominated borrowings	8,984,227	1.32%	2021-2059
TRY denominated borrowings	781,933	9.30%	2025-2035
<b>Total</b>	<b>21,762,741</b>		

The amounts of funds of the Group as of 31 December 2021 and 31 December 2020 are as follows:

	<b>31 December 2021</b>	<b>31 December 2020</b>
Environment fund	20,109	5,952
Other	1,508,682	239,264
<b>Total</b>	<b>1,528,791</b>	<b>245,216</b>

Funds borrowed include other funds obtained that are granted as loans as specified in the agreements signed between the Bank, and the Ministries or the institutions that the funds belong to.

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**14. FUNDS BORROWED AND SUBORDINATED LOANS (continued)**

**Funds borrowed (continued)**

	<b>31 December 2021</b>	<b>31 December 2020</b>
Borrowings with no maturity	368,631	102,320
Short term borrowings	1,160,160	142,896
Short term part of long term borrowings	208,415	94,126
Long term borrowings	37,702,520	21,668,615
<b>Total</b>	<b>39,439,726</b>	<b>22,007,957</b>

Repayment plan of borrowings is as follows:

	<b>31 December 2021</b>	<b>31 December 2020</b>
Borrowings with no maturity	368,631	102,320
2021	-	237,022
2022	1,368,575	305,211
2023 and thereafter	37,702,520	21,363,404
<b>Total</b>	<b>39,439,726</b>	<b>22,007,957</b>

Floating rate borrowings bear interest at rates fixed in advance for periods of 6 to 12 months.

Most of the loans from international finance institutions are from World Bank, European Investment Bank, Council of Europe Development, Islamic Development Bank, Black Sea Trade and Development Bank, Industrial and Commercial Bank of China, Kfw Development Bank, Asian Infrastructure Investment Bank, Japan Bank for International Cooperation.

As the Bank is not authorized to accept deposits, liabilities are composed of funds obtained from domestic and international financial institutions, medium and long term loans.

**Subordinated loans**

The subordinated loans as of 31 December 2021 and 31 December 2020 are as follows;

	<b>31 December 2021</b>	<b>31 December 2020</b>
Debt instruments to be included in additional capital calculation (*)	2,516,976	1,480,186
Debt instruments to be included in contribution capital calculation (**)	833,881	513,057
<b>Total</b>	<b>3,350,857</b>	<b>1,993,243</b>

(\*) An EUR 150 million amounted subordinated loan agreement has been signed between the Bank and TWF Market Stability and Equilibrium Sub-Fund established within Turkey Wealth Fund and the transaction has been completed as of 24 April 2019.

(\*\*) Subordinated Liabilities consists of the grants allocated to the Bank for the same purpose as the SELP-II program implemented in order to provide financial support to small entrepreneurs within the framework of the grant agreement which was signed between the Republic of Turkey represented by the Undersecretariat of Treasury, the KfW Development Bank, the Council of Europe Development Bank and the Bank as counterparties.

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**15. OTHER LIABILITIES AND PROVISIONS**

	<b>31 December 2021</b>	<b>31 December 2020</b>
<b>Other liabilities</b>		
Blocked currency	199,479	75,490
Unearned revenue	87,802	37,728
Lease liabilities	10,479	13,575
Excess amount received from customers	5,098	36,476
Payables to suppliers	4,241	-
Payables to public enterprises	3,728	3,728
Other	27,703	27,859
	<b>338,530</b>	<b>194,856</b>
<b>Provisions</b>		
Employee benefits provision	50,974	39,048
	<b>50,974</b>	<b>39,048</b>
<b>Total</b>	<b>389,504</b>	<b>233,904</b>

**Employee Termination Benefits**

In accordance with existing social legislation, the Bank and its subsidiaries incorporated in Turkey are required to make wholesale payments to employees whose employment is terminated due to retirement or for reasons other than resignation or misconduct. Such payments are calculated on the basis of 30 days' pay. Consequently, in the accompanying financial statements as at 31 December 2021, the provision has been calculated by estimating the present value of the future probable obligation of the Group arising from the retirement of the employees. The provisions at the respective balance sheet dates have been calculated a discount rate of 1.34% (31 December 2020: 2.40%). As the maximum liability is revised semiannually, the maximum amount of full TRY 10,596.74 effective from 1 January 2022 has been taken into consideration in calculation of provision from employment termination benefits (31 December 2020: full TRY 7,638.95).

Movements in the present value of the defined benefit were as follows:

	<b>31 December 2021</b>	<b>31 December 2020</b>
Opening defined benefit obligation	6,371	10,586
Changes in current period	5,497	8,642
Actuarial profit/loss	(813)	(625)
Benefits paid	(832)	(12,232)
<b>Closing defined benefit obligation, recognized in the balance sheet</b>	<b>10,223</b>	<b>6,371</b>
Provision for unused vacation	4,721	2,903
Bonus premium	36,030	29,774
<b>Total</b>	<b>50,974</b>	<b>39,048</b>

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**16. INCOME TAXES**

**Corporate Tax**

The Group is subject to corporate taxes. Provision is made in the accompanying financial statements for the estimated charge based on the Group's results for the period.

According to the Temporary Article 13 added to the Corporate Tax Law No: 5520 and with the Article 11 of the Law on the Procedure of Collection of Public Claims and the Law on the Amendment of Some Laws, which entered into force after being published in the Official Gazette dated 22 April 2021 and numbered 31462, the Corporate Tax rate will be applied as 25% for the corporate earnings for the 2021 taxation period and 23% for the corporate earnings for the 2022 taxation period. This change will be valid for the taxation of corporate earnings for the periods starting from 1 January 2021, starting with the declarations that must be submitted as of 1 July 2021. According to the new law, temporary tax calculations for the current period have been made by 25%.

The tax authorities can inspect tax returns and the related accounting records for a retrospective maximum period of five years. Corporate tax returns are required to be filed by the twenty-fifth day of the fourth month following the year-end reporting date and taxes must be paid in one instalment by the end of the fourth month.

Corporate tax losses are allowed to be carried 5 years maximum to be deducted from the taxable profits of the following years. However, losses incurred cannot be deducted from the profits incurred in the prior years retrospectively.

In Turkey, there is no procedure for a final and definitive agreement on tax assessments. Companies file their tax returns between April 1 and April 25 following the close of the accounting year to which they relate. Tax authorities may, however, examine such returns and the underlying accounting records and may revise assessments within five years.

**Income Withholding Tax**

In addition to corporate taxes, companies should also calculate income withholding taxes on any dividends distributed, except for companies receiving dividends who are resident companies in Turkey and Turkish branches of foreign companies. The rate of income withholding tax is 15%. Undistributed dividends incorporated in share capital are not subject to income withholding taxes.

As of 31 December 2021 and 2020 advance income taxes are netted off with the current income tax liability as stated below:

	<b>31 December 2021</b>	<b>31 December 2020</b>
Income tax liability	257,424	143,198
Advance income taxes	(232,226)	(97,914)
	<b>25,198</b>	<b>45,284</b>

Major components of income tax expense for the years ended 31 December 2021 and 2020 are:

	<b>31 December 2021</b>	<b>31 December 2020</b>
Current income tax expense	257,424	143,198
Deferred income tax expense/(income)	(58,868)	(24,330)
<b>Income tax expense reported in the consolidated income statement</b>	<b>198,556</b>	<b>118,868</b>

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**16. INCOME TAXES (continued)**

Reconciliation between tax expense and the accounting profit multiplied by the statutory income tax rate of the Bank for the year ended 31 December 2021 and 2020 are as follows:

	31 December 2021	Rate %	31 December 2020	Rate %
Profit before income tax	1,016,110		622,519	
At Turkish statutory income tax rate of 25%	254,028	25	136,954	22
Disallowed expenses	46,365	4.56	26,853	4.31
Income exempt from taxation	(42,853)	(4.22)	(21,311)	(3.42)
Other adjustments	(58,984)	(5.80)	(23,628)	0.11
<b>Income tax</b>	<b>198,556</b>	<b>20</b>	<b>118,868</b>	<b>23</b>

**Deferred income tax**

Deferred income tax as at 31 December 2021 and 31 December 2020 relates to the following:

	31 December 2021	31 December 2020
<b>Deferred Tax Assets</b>		
IFRS 9 Provision	57,683	12,434
Personnel Bonus Premium Provision	15,534	5,955
From Severance Payments	3,715	2,088
Securities Portfolio Internal Yield-Exchange Rate Difference	2,574	3,058
Other non-financial treasury bills and government bonds	6,834	-
Derivative Financial Assets	6,582	-
Other	5,052	667
<b>Total Deferred Tax Assets</b>	<b>97,974</b>	<b>24,202</b>
<b>Deferred Tax Liabilities</b>		
Other Non-Financial Treasury Bills and Government Bonds	-	(4,499)
Interest Rediscount	(1,329)	(1,109)
Other	(967)	(540)
<b>Total Deferred Tax Liabilities</b>	<b>(2,296)</b>	<b>(6,148)</b>
<b>Net Deferred Tax</b>	<b>95,678</b>	<b>18,054</b>

Movement of net deferred tax asset / (liability) can be presented as follows:

	2021	2020
Balance at January 1	18,054	(11,682)
Deferred income tax recognised in other comprehensive income	18,756	5,406
Deferred tax recognised in the profit or loss	58,868	24,330
<b>Balance at period-end</b>	<b>95,678</b>	<b>18,054</b>

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**17. SHARE CAPITAL**

The capital ceiling of the Bank which is subject to registered capital system is TRY 2,500,000. The authorized paid-in share capital of the Bank amounted to TRY 2,000,000 as of 31 December 2021 (31 December 2020: TRY 1,600,000). The Bank's capital consists of 200 Billion shares with par value of full TRY 0.01 each.

	Share (%)	31 December 2021	31 December 2020
Paid capital per statutory records			
- Republic of Turkey Ministry of Treasury and Finance	99.08	1,981,631	1,585,304
- Other Shareholders	0.92	18,369	14,696
		<u>2,000,000</u>	<u>1,600,000</u>
Indexation Effect		276,911	276,911
<b>Indexed Share Capital</b>		<b><u>2,276,911</u></b>	<b><u>1,876,911</u></b>

The paid-up capital of the Parent Bank has been increased from TRY 1,600,000 to TRY 2,000,000 by the issuance of shares with a nominal value of TRY 100,000 and TRY 300,000 from internal sources on 8 December 2021.

**18. DIVIDENDS PAID AND PROPOSED**

As of 31 December 2021, The Bank has no paid dividend amount (31 December 2020: None).

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**19. EARNINGS PER SHARE**

Basic earnings per share (“EPS”) are calculated by dividing the net profit for the year attributable to ordinary shareholders by the weighted average number of ordinary shares outstanding during the year.

In Turkey, companies can increase their share capital by making a pro rata distribution of shares (“Bonus Shares”) to existing shareholders without consideration for amounts resolved to be transferred to share capital from profit reserves such as retained earnings and revaluation surplus. For the purpose of the EPS calculation such Bonus Share issues are regarded as stock dividends. Dividend payments, which are immediately reinvested in the shares of the Bank, are regarded similarly. Accordingly, the weighted average number of shares used in the EPS calculation is derived by giving retroactive effect to the issue of such shares. The Bank has not experienced this kind of a capital increase.

	Number of Shares Issued Attributable to					Closing
	Opening	Cash	Transfers from Retained Earnings	Reinvestment of Dividend Payments	Total	
2016 and before	16,000,000,000	-	-	-	-	16,000,000,000
2017	16,000,000,000	34,000,000,000	-	-	-	50,000,000,000
2018	50,000,000,000	-	-	-	-	50,000,000,000
2019	50,000,000,000	35,000,000,000	-	-	-	85,000,000,000
2020	85,000,000,000	75,000,000,000	-	-	-	160,000,000,000
2021	160,000,000,000	10,000,000,000	30,000,000,000	-	-	200,000,000,000

There is no dilution of shares as of 31 December 2021 and 31 December 2020.

The following reflects the income and share data used in the basic earnings per share computations:

	31 December 2021	31 December 2020
Net profit / (loss) attributable to ordinary shareholders for basic earnings per share	817,557	503,651
Weighted average number of ordinary shares for basic earnings per share (thousand)	167,692,308	87,876,712
<b>Basic earnings per shares (Full TRY)</b>	<b>0.005</b>	<b>0.006</b>

There have been no other transactions involving ordinary shares or potential ordinary shares as of the date of this report.

**20. RELATED PARTIES**

A party is related to an entity if: the party controls, is controlled by, or is under common control with, the entity (this includes parents, subsidiaries and fellow subsidiaries); has an interest in the entity that gives it significant influence over the entity or has joint control over the entity. For the purpose of these consolidated financial statements, unconsolidated subsidiaries, associates, shareholders are referred to as related parties. Related parties also include individuals that are principal owners, management and members of the Group’s Board of Directors and their families and also post-employment benefit plan for the benefit of employees of the entity, or of any entity that is a related party of the entity.

The immediate parent and ultimate controlling party of the Group is the Republic of Turkey Ministry of Treasury and Finance. Transactions between the Bank and its subsidiaries, which is a related party of the Bank, have been eliminated on consolidation and are not disclosed in this note.

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**20. RELATED PARTIES (continued)**

As of 31 December 2021, subordinated loan amounting to TRY 3,350,857 was obtained from Republic of Turkey Ministry of Treasury and Finance (31 December 2020: TRY 1,993,243).

**Transactions with key management personnel:**

Key management personnel comprise of the Group's directors and key management executive officers.

As of 31 December 2021 and 2020 the Group's directors and executive officers have no outstanding personnel loans from the Bank.

Total compensation provided to key management personnel is:

	2021	2020
Salary	9,911	8,544
Dividend and fringe benefits	1,825	1,192
<b>Total</b>	<b>11,736</b>	<b>9,736</b>

**21. INTEREST INCOME**

**Interest income on loans**

	2021	2020
Short term loans	5,675	8,184
Medium and long term loans	1,308,196	794,213
Interest on non-performing loans	60,092	8,734
<b>Total (*)</b>	<b>1,373,963</b>	<b>811,131</b>

(\*) Includes fees and commissions received from cash-loans.

**Interest income on banks**

	2021	2020
From domestic banks	372,690	135,650
From foreign banks	13	55
<b>Total</b>	<b>372,703</b>	<b>135,705</b>

**Interest income on securities**

	2021	2020
Investment securities at FVOCI	181,250	102,497
Investment securities at amortised cost	152,564	85,926
<b>Total</b>	<b>333,814</b>	<b>188,423</b>

**Interest income from money market transactions**

	2021	2020
Interest received from money market transactions	7,841	81
Interests received from reverse repo transactions	131,764	80,994
<b>Total</b>	<b>139,605</b>	<b>81,075</b>

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**22. INTEREST EXPENSE ON BORROWINGS**

	<b>2021</b>	<b>2020</b>
Banks (*)	176,574	9,385
Central Bank of the Republic of Turkey	175,943	8,206
Domestic Banks	631	1,179
Other Institutions (*)	595,921	455,976
<b>Total</b>	<b>772,495</b>	<b>465,361</b>

(\*) Includes fees and commissions payable to cash-loans.

**23. OTHER OPERATING INCOME**

	<b>2021</b>	<b>2020</b>
Income from sale of properties	27,582	90,987
Reversal of other provisions	32,050	42,625
Other	13,519	6,752
<b>Total</b>	<b>73,151</b>	<b>140,364</b>

**24. OTHER OPERATING EXPENSES**

	<b>2021</b>	<b>2020</b>
Administrative expenses	24,789	19,019
Staff costs:	141,737	115,048
Personnel expenses	98,498	81,346
Retirement pay provision	5,830	2,166
Personnel bonus premium provision	35,280	29,774
Provision exp for unused vacation	2,129	1,762
Provision expense	983	2,579
Depreciation and amortization expense	12,036	10,816
Other	27,736	15,984
<b>Total</b>	<b>207,281</b>	<b>163,446</b>

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**25. FEES AND COMMISSIONS INCOME AND EXPENSES**

	<b>31 December 2021</b>	<b>31 December 2020</b>
<b>Fees and commissions income</b>		
Banking	64,745	31,144
<b>Total</b>	<b>64,745</b>	<b>31,144</b>
<b>Fees and commissions expenses</b>		
Banking	(15,960)	(10,521)
<b>Total</b>	<b>(15,960)</b>	<b>(10,521)</b>

**26. COMMITMENTS AND CONTINGENCIES**

In the normal course of business activities, the Group undertakes various commitments and incurs certain contingent liabilities that are not presented in the financial statements including:

	<b>31 December 2021</b>	<b>31 December 2020</b>
Letters of guarantee issued	2,305,847	730,656
<b>Total non-cash loans</b>	<b>2,305,847</b>	<b>730,656</b>
Other commitments	403,662	24,399
<b>Total</b>	<b>2,709,509</b>	<b>755,055</b>

Istanbul Venture Capital Initiative (IVCI - A Luxemburg Investment Company Fund) is founded as a stock company having variable capital and subject to laws of Luxemburg. The Bank has committed to buy “Group A” shares equal to nominal value of EUR 10 million and to pay this amount at the date determined by Fund according to its investment plan. The Fund’s initial capital commitment was EUR 150 Million and its capital was increased to EUR 160 Million with new participants in March 2009. The Bank’s participation was approved by the Board of Directors of IVCI on 13 November 2007 and share purchase agreement was signed at of the same date.

The Bank made payment of share capital constituting payments equal to EUR 300,000 on 7 November 2008, EUR 218,750 on 6 July 2009 and EUR 281,250 on 12 November 2010, EUR 167,500 on 15 July 2011, EUR 437,500 on 10 November 2011, EUR 500,000 on 15 February 2012, EUR 500,000 on 25 May 2012, EUR 250,000 on 10 August 2012, EUR 500,000 on 19 September 2012, EUR 500,000 on 18 January 2013, EUR 500,000 on 27 June 2013 and EUR 500,000 on 13 December 2013, EUR 500,000 on 1 August 2014, EUR 500,000 on 29 August 2014, EUR 500,000 on 4 May 2015, EUR 500,000 on 16 October 2015, EUR 500,000 on 3 May 2016 and EUR 312,500 on 30 November 2017, EUR 312,500 on 2 March 2018, EUR 312,500 on 12 December 2018, EUR 980,842 on 13 December 2019, EUR 312,500 on 21 July 2020 the total capital payment is EUR 9,385,842.

With reference to the above capital contributions, out of the Bank’s total commitment of EUR 10 million, EUR 9,385,842 have been paid, EUR 614,158 is not yet paid as of the balance sheet date.

The Bank has made an investment commitment of up to EUR 3 Million to 212 Regional Fund II, whose establishment location is Luxemburg, as a limited partner, below 10% of the total fund commitment amount.

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**26. COMMITMENTS AND CONTINGENCIES (continued)**

The Bank made payment of share capital constituting payments equal to EUR 45,000 on 31 December 2018, EUR 120,000 on 21 January 2019, EUR 330,000 on 21 March 2019, EUR 120,000 on 9 September 2019, EUR 330,000 on 9 December 2019, EUR 300,000 on 4 May 2021, EUR 60,000 on 29 July 2021, EUR 165,000 on 15 November 2021.

Based on the explanations above, the Bank has paid EUR 1,470,000 of the amount of EUR 3 Million committed as of the balance sheet date, while EUR 1,530,000 has not been paid yet.

**Transactions Made on Behalf and Account of Others and Fiduciary Transactions**

The Bank has no fiduciary transactions.

**Litigation**

As 31 December 2021, there are 144 cases which are brought against the Bank. The risk amount is TRY 11,515. As of 31 December 2021, provision on the financial tables for these cases amounting to TRY 1,950 (31 December 2020: 202 cases, the risk amount is TRY 9,052 and the provision amount is TRY 966).

**27. FINANCIAL RISK MANAGEMENT**

**Organization of the Risk Management Function**

Risk management activities of the Bank are performed under the responsibility of Board of Directors and in accordance with "Regulation on Banks' Internal Systems" published in the Official Gazette numbered 28337 and dated 28 June 2012. Top management is responsible against Board of Directors for monitoring and management of risks. In addition, departments included in the Internal Systems, namely Internal Control Department, Risk Monitoring Department and Board of Inspection transact their responsibilities independently from the executive departments.

The general risk principles followed by the bank can be defined as including the following activities: specializing in activities in accordance with its mission, vision and its structure defined in its settlement law, taking definable, monitorable and/or manageable risks accordingly, avoiding risks other than the ones unavoidable due to the main activities. Within this scope, fundamental principle is taking risks which are defined and manageable. Additionally, current and future potential effects of the risks currently taken are measured to the extent possible by the risk measurement and reporting techniques and it is continued to be performed accordingly.

The Bank is actively using committees and risk budgeting in decision-making mechanisms and risk management processes while assessing risk management performance in addition to the functional and financial performance, which has operational mechanisms based on a wide range of activities. Within the framework of the Bank's vision, mission, strategic objectives and targets set by the Board of Directors and risk management policies and strategies; the Asset and Liability Management Committee and the Credit Participation Committee constitute two main committees that play a critical role in the execution of the Bank's activities; which the Asset and Liability Management Committee ensuring that the assets and liabilities are managed effectively and efficiently by taking into consideration the current and possible economic developments and the factors such as interest, maturity and currency, and establishing coordination and communication between the Senior Management and the Bank's units, and the Credit Participation Committee with the function of determining the principles of lending, evaluating the credit-participation risk and the situation of the investment, evaluating the reports prepared on the loan appraisal and in summary taking care of all the lending activities. Within the framework of the short-term strategies determined by the Asset and Liability Management Committee in line with the vision and strategic objectives of the Bank's Strategic Plan, each of the units in the Bank comply with these targets and the risk budgeting application based on the consolidation of these budgets are applied to contribute to the basic activities of the Bank.

Considering the best practices, the Bank executes measuring, monitoring activities, testing and scenario analysis confirming with the volume, character and complexity of transactions, within the legal regulations and limits of the authority, and provides reporting to top management.

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**27. FINANCIAL RISK MANAGEMENT (continued)**

**Credit Risk**

The Bank manages its credit risk by limiting its risk through involvement with highly credible banks and organizations. Credibility of the counterparties is analyzed by different methods depending on the type of credit. Detailed analyses are performed and loan limits are submitted to the approval of Board of Directors or Loan Investment Committee depending on the amount of the loan to be disbursed. The limits of counter parties are determined for the total loans of a single company; and there is no special limit set for the sectoral or concentration basis. If the counterpart is not credible, no new credit is extended or limit is decreased to risk level. Since the placements of the Bank are in the form of project financing, the amount of loan that can be disbursed to a firm is basically determined during project assessment stage and disbursements are made in a controlled manner through monitoring of expenditures.

Under the risk management, the Bank obtains adequate collateral for loans given and other receivables. Such collateral comprises of real estate and tangible assets mortgages, business company liens, foreign currency notes and other liquid assets, bank guarantee letters and surety ships of reals persons or companies.

The sectoral distribution of the loan customers is monitored and those distributions are taken into account during placement decisions and goals.

The Bank is not subject to the general loan restrictions defined by the 53<sup>th</sup> article of the Banking Law numbered 5411. However, the loan limits are determined mostly in parallel with the limitations set out in the 53<sup>th</sup> article of the Banking Law.

Credit risk is analyzed by different group of loans and guarantees received for those loans. Also, the credibility of the debtors of the Group is assessed periodically in accordance with the prevailing regulations on lending and provisioning.

The primary purpose of credit related commitments is to ensure that funds are available to a customer as required. Guarantees and standby letters of credit – which represent irrevocable assurances that the Group will make payments in the event that a customer cannot meet its obligations to third parties, carry the same credit risk as loans. Documentary and commercial letters of credit – which are written undertakings by the Group on behalf of a customer authorizing a third party to draw drafts on the Group up to a stipulated amount under specific terms and conditions – are collateralized by the underlying shipments of goods to which they relate and therefore carry less risk than a direct borrowing. Commitments to extend credit represent unused portions of authorizations to extend credit in the form of loans, guarantees or letters of credit.

With respect to credit risk on commitments to extend credit, the Group is potentially exposed to loss in an amount equal to the total unused commitments. However, the likely amount of loss is less than the total unused commitments, as most commitments to extend credit are contingent upon customers maintaining specific credit standards.

The Bank bears low credit risk due to its foreign banking transactions as its credit risk is mainly concentrated in Turkey.

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**27. FINANCIAL RISK MANAGEMENT (continued)**

**Credit Risk (continued)**

***Impairment assessment based on IFRS 9***

As of 1 January 2019, the Group recognizes provisions for impairment in accordance with IFRS 9 requirements. The expected credit losses are estimated to be unbiased, weighted according to probabilities, and include information that can be supported about past events, current conditions and future economic conditions. Risk parameters used in IFRS 9 calculations are included in the future macroeconomic information. These financial assets are divided into three categories depending on the gradual. The Group calculates expected credit losses based on a probability-weighted estimate of credit losses (i.e. the present value of all cash shortfalls) over the expected life of the financial instrument. A cash shortfall is the difference between the cash flows that are due based on the contract and the cash flows that are expected to be received.

Sectoral breakdown of cash loans is as follows:

	Cash	
	31 December 2021	31 December 2020
Manufacturing	25,869,544	13,837,906
<i>Electric, gas and water</i>	19,837,026	11,523,864
<i>Production</i>	6,032,518	2,314,042
Services	10,595,160	6,248,737
<i>Financial institutions</i>	8,126,829	4,533,679
<i>Hotel, food and beverage services</i>	1,413,934	1,173,579
<i>Transportation</i>	525,831	331,527
<i>Rental services</i>	253,133	-
<i>Health and social services</i>	128,801	95,862
<i>Education services</i>	97,238	94,056
<i>Construction</i>	49,394	20,034
Other	163,364	93,810
<b>Total loans</b>	<b>36,628,069</b>	<b>20,180,453</b>
Non-performing loans	851,318	218,511
Expected credit loss (-)	(788,381)	(344,025)
<b>Total</b>	<b>36,691,005</b>	<b>20,054,939</b>

Maximum exposure to credit risk for the components of the financial statements:

	31 December 2021	31 December 2020
Deposits with banks and other financial institutions	3,273,103	3,555,688
Money market placements	993,282	1,500,739
Balances with the Central Bank	2,026	1,115
Financial assets measured at FVOCI	3,932,699	964,894
Loans and advances to customers and financial institutions	36,691,005	20,054,939
Investment securities at amortised cost	3,011,036	1,716,908
<b>Total</b>	<b>47,903,151</b>	<b>27,794,283</b>
Contingent liabilities	2,305,847	730,656
<b>Total</b>	<b>2,305,847</b>	<b>730,656</b>
<b>Total credit risk exposure</b>	<b>50,208,998</b>	<b>28,524,939</b>

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**27. FINANCIAL RISK MANAGEMENT (continued)**

**Credit Risk (continued)**

Credit quality per class of financial assets as of 31 December 2021 and 2020;

<b>As of 31 December 2021</b>	<b>Neither past due nor impaired</b>	<b>Past due but not impaired</b>	<b>Total</b>
Deposits with banks and other financial institutions	3,273,103	-	3,273,103
Loans and advances to customers and financial institutions	34,482,319	2,208,686	36,691,005
Financial assets measured at fair value through other comprehensive income (FVOCI)	3,932,699	-	3,932,699
Investments securities at amortised cost	3,011,036	-	3,011,036

  

<b>As of 31 December 2020</b>	<b>Neither past due nor impaired</b>	<b>Past due but not impaired</b>	<b>Total</b>
Deposits with banks and other financial institutions	3,555,688	-	3,555,688
Loans and advances to customers and financial institutions	18,793,986	1,260,953	20,054,939
Financial assets measured at fair value through other comprehensive income (FVOCI)	964,894	-	964,894
Investments securities at amortised cost	1,716,908	-	1,716,908

Aging analysis of past due but not impaired financial assets per classes of financial instruments:

<b>As of 31 December 2021</b>	<b>Less than 30 Days</b>	<b>Between 31 and 60 Days</b>	<b>Between 61 and 90 Days</b>	<b>Total</b>
Corporate loans	1,163,419	86,820	615,847	1,866,086
Specialized loans	272,689	39,698	30,213	342,600
<b>Total</b>	<b>1,436,108</b>	<b>126,518</b>	<b>646,060</b>	<b>2,208,686</b>

  

<b>As of 31 December 2020</b>	<b>Less than 30 Days</b>	<b>Between 31 and 60 Days</b>	<b>Between 61 and 90 Days</b>	<b>Total</b>
Corporate loans	23,474	961,195	96,763	1,081,432
Specialized loans	-	151,555	27,966	179,521
<b>Total</b>	<b>23,474</b>	<b>1,112,750</b>	<b>124,729</b>	<b>1,260,953</b>

The net value and type of the collaterals of closely monitored loans is as follows:

<b>Collateral Type</b>	<b>31 December 2021</b>	<b>31 December 2020</b>
Real estate mortgage (*)	981,315	619,328
Financial collaterals (Cash, securities pledge, etc.)	1,309,399	679,630
<b>Total</b>	<b>2,290,714</b>	<b>1,298,958</b>

(\*) Amount of collateral is stated at the lower of appraisal value or mortgage value. When the collateral value exceeds the credit risk loan balance, credit risk loan balance is presented.

The net value and type of the collaterals of non-performing loans is as follows:

<b>Collateral Type</b>	<b>31 December 2021</b>	<b>31 December 2020</b>
Real estate mortgage (*)	846,569	206,723
Other (**)	-	3,446
<b>Total</b>	<b>846,569</b>	<b>210,169</b>

(\*) Amount of collateral is stated at the lower of appraisal value or mortgage value, when the collateral value exceeds the credit risk loan balance, credit risk loan balance is presented.

(\*\*) As collateral, real estate mortgages have been obtained for loans.

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**27. FINANCIAL RISK MANAGEMENT (continued)**

**Liquidity Risk**

In the Bank, liquidity risk management is performed through projected cash flows. These cash flows are prepared using forecasted data considering the maturity structure of assets and liabilities. The projected cash flows include information required to determine liquidity needs (if any) that would arise in the coming periods and/or extraordinary situations, alternative liquidity sources and placement areas. During preparation of projections for future cash flows based on these information, liquidity risk exposure of the Bank is measured using different scenarios (for example, credit collection ratios).

Besides, monthly projected cash flows related to coverage ratios for medium- and long-term liabilities and balance sheet durations are monitored continuously in order to identify risk factors in advance. In the case situations creating risk are present; initiatives are taken by related departments to eliminate this situation. In order to evaluate the effects of negative developments at the parameters that affect the financial strength of the Bank to operations and market risks, it is essential to apply stress tests and to use the results within the Bank's strategic decision-making process.

Analyzing the structure of the Bank's assets and borrowings, loans provided by international financial institutions consists of medium and long-term loans with floating interest rate, and these funds are disbursed by taking into account the re-pricing period. Balance sheet mainly consists of loans that, given the impact of interest rate shocks on the profitability is thought to be limited to a portfolio of liquid assets and liabilities. In addition, the share of the equity in liabilities thus released funds is high and it makes the Bank advantageous in the liquidity risk management. Assessment of maturity/yield alternatives for the placement of liquidity surplus and maturity/cost alternatives to meet liquidity needs is the basic principle of the Bank liquidity management.

Analysis of financial liabilities by remaining contractual maturities:

<b>As of 31 December 2021</b>	<b>Up to 1 Month</b>	<b>1-3 Months</b>	<b>3-12 Months</b>	<b>1-5 Years</b>	<b>Over 5 Years</b>	<b>Adjustment</b>	<b>Total</b>
<b>Liabilities</b>							
Funds borrowed	1,950,819	754,303	3,581,284	21,584,693	15,457,051	(3,888,424)	39,439,726
Obligations under repurchase agreements	629,707	-	-	-	-	-	629,707
Subordinated liabilities	-	-	-	-	3,350,857	-	3,350,857
<b>Total</b>	<b>2,580,526</b>	<b>754,303</b>	<b>3,581,284</b>	<b>21,584,693</b>	<b>18,807,908</b>	<b>(3,888,424)</b>	<b>43,420,290</b>

<b>As of 31 December 2020</b>	<b>Up to 1 Month</b>	<b>1-3 Months</b>	<b>3-12 Months</b>	<b>1-5 Years</b>	<b>Over 5 Years</b>	<b>Adjustment</b>	<b>Total</b>
<b>Liabilities</b>							
Funds borrowed	329,037	363,280	1,967,138	14,391,575	10,513,262	(5,556,335)	22,007,957
Obligations under repurchase agreements	203,850	-	-	-	-	-	203,850
Subordinated liabilities	-	-	-	-	1,993,243	-	1,993,243
<b>Total</b>	<b>532,887</b>	<b>363,280</b>	<b>1,967,138</b>	<b>14,391,575</b>	<b>12,506,505</b>	<b>(5,556,335)</b>	<b>24,205,050</b>

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**27. FINANCIAL RISK MANAGEMENT (continued)**

Presentation according to remaining period at balance sheet date to contractual maturities:

<b>As of 31 December 2021</b>	<b>Demand</b>	<b>Up to 1 Month</b>	<b>1-3 Months</b>	<b>3-12 Months</b>	<b>1 year to 5 years</b>	<b>Over 5 years</b>	<b>Undistributed (* )</b>	<b>Total</b>
<b>Assets</b>								
Cash and cash equivalents	32,453	3,240,674	-	-	-	-	-	3,273,127
Balances with Central Bank	2,026	-	-	-	-	-	-	2,026
Money market placements	-	992,465	-	-	-	-	-	992,465
Financial assets at fair value through profit and loss	220,867	-	-	-	-	-	-	220,867
Investment securities at FVOCI	16,478	32,136	463,924	1,334,251	1,829,438	256,472	-	3,932,699
Loans and advances to customers and financial institutions	-	426,317	1,004,699	4,544,269	22,653,897	7,738,944	322,879	36,691,005
Investments securities measured at amortised cost	-	-	36,368	9,982	2,890,879	73,807	-	3,011,036
Other assets	-	365	-	-	-	-	256,526	256,891
<b>Total assets</b>	<b>271,824</b>	<b>4,691,957</b>	<b>1,504,991</b>	<b>5,888,502</b>	<b>27,374,214</b>	<b>8,069,223</b>	<b>579,405</b>	<b>48,380,116</b>
<b>Liabilities and equity</b>								
Funds provided from other financial institutions	-	1,950,819	754,303	3,581,284	21,584,693	15,457,051	-3,888,424	39,439,726
Obligations under purchase agreements	-	629,707	-	-	-	-	-	629,707
Subordinated loans	-	-	-	-	-	-	3,350,857	3,350,857
Other liabilities	56,256	421,976	15,045	-	-	-	-	493,277
<b>Total liabilities</b>	<b>56,256</b>	<b>3,002,502</b>	<b>769,348</b>	<b>3,581,284</b>	<b>21,584,693</b>	<b>15,457,051</b>	<b>(537,567)</b>	<b>43,913,567</b>
<b>Liquidity gap</b>	<b>215,568</b>	<b>1,689,455</b>	<b>735,643</b>	<b>2,307,218</b>	<b>5,789,521</b>	<b>(7,387,828)</b>	<b>1,116,972</b>	<b>4,466,549</b>
<b>As of 31 December 2020</b>								
Total assets	1,111,436	5,233,980	391,851	2,322,707	13,869,854	4,918,871	223,340	28,072,039
Total liabilities	-	455,995	411,123	15,120,725	1,919,445	8,242,461	(1,665,464)	24,484,285
<b>Liquidity gap</b>	<b>1,111,436</b>	<b>4,777,985</b>	<b>(19,272)</b>	<b>(12,798,018)</b>	<b>11,950,409</b>	<b>(3,323,590)</b>	<b>1,888,804</b>	<b>3,587,754</b>

(\*) Assets which are required for banking operations and could not be converted into cash in short-term, such as; tangible assets, associates, subsidiaries, office supply inventory, prepaid expenses and non-performing loans; and other liabilities such as provisions which are not considered as payables are classified as undistributed.

(\*\*) Deferred tax asset is included under the “Undistributed” column.

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**27. FINANCIAL RISK MANAGEMENT (continued)**

**Market Risk**

Market risk is calculated within the scope of the “Regulation on Measurement and Assessment of Capital Adequacy Ratios of Banks” published in the Official Gazette dated 28 June 2012 and numbered 28337 and legally reported.

Besides monthly calculation made as per standard method, market risk is calculated daily as per Value at Risk (“VaR”) method and reported to top management. Calculations are made using Historical Simulation method. In order to test the reliability of the VaR model, back tests are performed. Stress tests are also applied in order to reflect the effects of prospective severe market fluctuations in the market parameters on income statement.

In compliance with the “Regulation on Banks’ Internal Control and Risk Management Systems” published in the Official Gazette dated 28 June 2012 and numbered 28337, Board of Directors determine risk limits considering the major risks beared by the Bank and revise these limits based the market conditions and the strategies of the Bank.

The reports prepared for the monitoring of the risk limits are regularly submitted to the Board of Directors, Audit Committee and top management.

**Currency Risk**

Foreign currency risk indicates the possibilities of potential losses that banks are subject to due to the exchange rate movements in the market. While calculating the share capital requirement, all foreign currency assets, liabilities and forward transactions of the Group are taken into account, net short and long position of the Turkish Lira equivalent to each foreign currency is calculated.

Standard method determined for legal reporting is used in the calculation of the exchange rate risk faced by the Bank.

In addition, daily currency risk faced by the Bank can be determined by the foreign currency balance sheets that are prepared to include singular positions. Projected foreign currency balance sheets are used in the calculation of the future possible exchange rate risk (including foreign currency based assets and liabilities). To limit the amount of currency risk exposed, a non-speculative foreign currency position risk management is adopted and used in the distribution of balance sheet and off-balance sheet assets according to their currencies.

*Foreign currency sensitivity:*

The Group is mainly exposed to EUR and USD currency risk.

The following table details the Group’s sensitivity to a 10% increase and decrease in the USD or EUR foreign exchange rates, 10% is the sensitivity rate used when reporting foreign currency risk internally to key management personnel and represents management’s assessment of the possible change in foreign exchange rates.

	Change in currency rate in %	Increase/(Decrease) Effect on profit / loss (*)		Increase/(Decrease) Effect on equity (**)	
		31 December 2021	31 December 2020	31 December 2021	31 December 2020
		USD	10 increase	1,734	(1,019)
USD	10 decrease	(1,734)	2,298	(176,876)	(14,893)
EURO	10 increase	3,518	363	117,784	24,159
EURO	10 decrease	(3,518)	(1,643)	(117,784)	(24,159)
Other	10 increase	112	61	-	-
Other	10 decrease	(112)	(61)	-	-

(\*) Tax effect excluded.

(\*\*) Profit/loss effect included.

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**27. FINANCIAL RISK MANAGEMENT (continued)**

**Currency Risk (continued)**

The Group's sensitivity to foreign currency rates has not changed much during the current period. The positions taken in line with market expectations can increase the foreign currency sensitivity from period to period.

The concentrations of assets, liabilities and off-balance sheet items in various currencies are:

	<b>EURO</b>	<b>USD</b>	<b>Other FC</b>	<b>Total</b>
<b>As of 31 December 2021</b>				
Assets				
Cash and deposits with banks and other financial institutions	253,271	74,184	1,124	328,579
Investment securities at FVOCI	1,177,836	1,768,759	-	2,946,595
Financial assets at fair value through profit and loss	213,743	-	-	213,743
Money market placements	-	-	-	-
Loans and advances to customers and financial institutions	11,791,996	22,452,043	-	34,244,039
Financial assets measured at amortised cost	2,848,402	-	-	2,848,402
Other assets	13,488	56,023	-	69,511
<b>Total assets</b>	<b>16,298,736</b>	<b>24,351,009</b>	<b>1,124</b>	<b>40,650,869</b>
Liabilities				
Funds provided from other financial institutions	13,651,233	22,680,925	-	36,332,158
Subordinated loans	3,350,857	-	-	3,350,857
Other liabilities	123,594	380,919	-	504,513
<b>Total liabilities</b>	<b>17,125,684</b>	<b>23,061,844</b>	<b>-</b>	<b>40,187,528</b>
<b>Net on balance sheet position</b>	<b>(826,948)</b>	<b>1,289,165</b>	<b>1,124</b>	<b>463,341</b>
<b>Net off balance sheet position</b>	<b>846,860</b>	<b>(1,289,857)</b>	<b>-</b>	<b>(442,997)</b>
Non-cash loans	1,017,718	1,234,957	-	2,252,675
<b>As of 31 December 2020</b>				
<b>Total assets</b>	<b>11,017,494</b>	<b>12,215,732</b>	<b>610</b>	<b>23,233,836</b>
<b>Total liabilities</b>	<b>11,017,494</b>	<b>12,215,732</b>	<b>610</b>	<b>23,233,836</b>
<b>Net on balance sheet position</b>	<b>12,883</b>	<b>(9,036)</b>	<b>610</b>	<b>4,457</b>
<b>Net off balance sheet position</b>	<b>(6,399)</b>	<b>6,396</b>	<b>-</b>	<b>(3)</b>
Non-cash loans	675,830	-	-	675,830

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**27. FINANCIAL RISK MANAGEMENT (continued)**

**Interest Rate Risk**

Bank calculates the interest rate risk on banking book according to “Regulation on Measurement and Evaluation of Interest Rate Risk on Banking Book as per Standard Shock Method” and reports to the BRSA monthly.

Interest Rate Risk on Banking Book report includes Receivables from Central Bank, Money Market Placements, Receivables from Banks, Available for Sale Financial Assets (excluding government bonds), Receivables from Reverse-repo, Loans and Receivables, Investments Held to Maturity and Other Receivables in the asset side, and Payables to Central Bank, Money Market Borrowings, Payables to Banks, Funds Obtained from Repo Transactions, Issued Bonds; Borrowings, Subordinated Debt and Other Payables on the liabilities side.

Economic value differences due to the interest rate instabilities calculated according to “Regulation on Measurement and Evaluation of Interest Rate Risk on Banking Book as per Standard Shock Method” are presented below for each currency.

	<b>Current Period (31.12.2021)</b>	Applied Shock	Gains / Losses	Gains / Equity –
	Currency	(+/- x base points)		Losses / Equity
1	TRY	(+) 500 base points	(46,065)	-0.60%
2	TRY	(-) 400 base points	40,876	0.53%
3	EURO	(+) 200 base points	184,014	2.40%
4	EURO	(-) 200 base points	(263,761)	(3.43)%
5	USD	(+) 200 base points	326,168	4.25%
6	USD	(-) 200 base points	(431,919)	(5.62)%
	<b>Total (Of Negative Shocks)</b>		<b>464,117</b>	<b>6.04%</b>
	<b>Total (Of Positive Shocks)</b>		<b>(654,804)</b>	<b>(8.53)%</b>

	<b>Prior Period (31.12.2020)</b>	Applied Shock	Gains / Losses	Gains / Equity –
	Currency	(+/- x base points)		Losses / Equity
1	TRY	(+) 500 base points	(25,772)	(0.46) %
2	TRY	(-) 400 base points	24,530	0.43 %
3	EURO	(+) 200 base points	92,794	1.64 %
4	EURO	(-) 200 base points	(111,878)	(1.98) %
5	USD	(+) 200 base points	(99,413)	(1.76) %
6	USD	(-) 200 base points	117,455	2.08 %
	<b>Total (Of Negative Shocks)</b>		<b>(32,391)</b>	<b>(0.58) %</b>
	<b>Total (Of Positive Shocks)</b>		<b>30,107</b>	<b>0.53 %</b>

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**27. FINANCIAL RISK MANAGEMENT (continued)**

**Interest Rate Risk (continued)**

Interest rate sensitivity based on repricing dates:

<b>As of 31 December 2021</b>	<b>Up to 1 month</b>	<b>1 to 3 months</b>	<b>3 to 12 months</b>	<b>1 year to 5 years</b>	<b>Over 5 years</b>	<b>Non-interest bearing</b>	<b>Total</b>
<b>Assets</b>							
Cash and deposits with banks and other financial institutions	3,240,674	-	-	-	-	32,453	3,273,127
Balances with Central Bank	-	-	-	-	-	2,026	2,026
Money market placements	-	992,465	-	-	-	-	992,465
Financial assets at fair value through profit and loss	-	-	-	-	-	220,867	220,867
Investment securities at FVOCI	32,122	460,897	1,520,530	1,825,716	76,956	16,478	3,932,699
Loans and advances to customers and financial institutions	15,880,496	5,400,291	4,561,834	4,364,753	6,160,752	322,879	36,691,005
Investment securities at amortised cost	-	-	-	2,935,638	75,398	-	3,011,036
Other assets	-	-	-	-	-	256,891	256,891
<b>Total assets</b>	<b>19,153,292</b>	<b>6,853,653</b>	<b>6,082,364</b>	<b>9,126,107</b>	<b>6,313,106</b>	<b>851,594</b>	<b>48,380,116</b>
<b>Liabilities</b>							
Obligations under repurchase agreements	629,707	-	-	-	-	-	629,707
Subordinated loans	-	-	-	-	-	3,350,857	3,350,857
Funds provided from other financial institutions	6,189,588	8,665,090	9,775,573	7,660,137	6,902,490	246,848	39,439,726
Other liabilities	56,256	421,976	15,045	-	-	-	493,277
Equity	-	-	-	-	-	4,466,549	4,466,549
<b>Total liabilities</b>	<b>6,875,551</b>	<b>9,087,066</b>	<b>9,790,618</b>	<b>7,660,137</b>	<b>6,902,490</b>	<b>8,064,254</b>	<b>48,380,116</b>
On balance sheet interest sensitivity gap – Long	12,277,741	-	-	1,465,970	-	-	13,743,711
On balance sheet interest sensitivity gap – Short	-	(2,233,413)	(3,708,254)	-	(589,384)	(7,212,660)	(13,743,711)
Off balance sheet interest sensitivity gap – Long	-	-	-	-	-	-	-
Off balance sheet interest sensitivity gap – Short	-	-	-	-	-	-	-
<b>Total position</b>	<b>12,277,741</b>	<b>(2,233,413)</b>	<b>(3,708,254)</b>	<b>1,465,970</b>	<b>(589,384)</b>	<b>(7,212,660)</b>	<b>-</b>
<b>As of 31 December 2020</b>							
Total assets	9,825,427	4,020,903	3,497,131	4,368,903	5,975,451	384,224	28,072,039
Total liabilities	4,675,396	4,064,470	6,728,768	4,010,612	2,861,077	5,731,716	28,072,039
<b>Total position</b>	<b>5,150,031</b>	<b>(43,567)</b>	<b>(3,231,637)</b>	<b>358,291</b>	<b>3,114,374</b>	<b>(5,347,492)</b>	<b>-</b>

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**27. FINANCIAL RISK MANAGEMENT (continued)**

**Capital Adequacy**

To monitor the adequacy of its capital, the Group uses ratios established by Banking Regulation and Supervision Agency (“BRSA”). The minimum ratio is 8%. These ratios measure capital adequacy by comparing the Group’s eligible capital with its balance sheet assets, off-balance sheet commitments and market and other risk positions at weighted amounts to reflect their relative risk. The Bank operates only in domestic markets.

Beginning from 1 July 2012, capital adequacy ratio is calculated within the scope of the “Regulation on Measurement and Assessment of Capital Adequacy Ratios of Banks” (the “Regulation”) published in the Official Gazette dated 28 June 2012 and numbered 28337 and “Communiqué on Credit Risk Mitigation Techniques” published in the Official Gazette dated 5 September 2013 and numbered 28756.

In capital adequacy standard ratio calculation, based upon the data prepared from accounting records in compliance with the current legislation, the Standard Method is used to calculate capital adequacy for Credit Risk and Market Risk and Basic Indicator Approach is used annually for Operational Risk.

In calculation of value at credit risk, the Bank assesses credit items in related risk weights by considering risk categories, rating notes and other risk reducing factors under the framework of “Communiqué on Credit Risk Mitigation Techniques”.

The non-cash loans and commitments and the receivables from counterparties in such transactions are weighted after netting with specific provisions that are calculated based on the “Regulation on Procedures and Principles for Determination of Qualification of Loans and Other Receivables, and Allocation of Provisions” and classified under liabilities. The net amounts are then multiplied by the rates stated in the Article 5 of the Regulation, reduced as per the “Communiqué on Credit Risk Mitigation Techniques” and then included in the relevant risk classification defined in the article 6 and weighted as per Appendix-1 of the Regulation.

As per the article 5 of the Regulation, the “counterparty credit risk” is calculated for repurchase and reverse repurchase agreements.

As of 31 December 2021, its capital adequacy ratio on a consolidated basis is 14.27% (31 December 2020: 22.35%).

**Operational Risk**

Operational risk is defined as the probability of loss or damage due to the overlooked errors and irregularities arising from failures of the internal controls of the Bank, and not responding timely by the Bank’s management and the personnel, errors and irregularities of the information systems, and due to the disasters like earthquake, fire or flood, or terrorist attacks. From this point, all major operation groups include operational risk.

The Bank manages operational risk according to volume, nature and complexity of operations and within the context of BRSA regulations; accepts that operational risk management covers all operations and personnel. The basic principle of operational risk management policy is to take precautions to prevent realization of risks. Intensification of controls over each stage of business processes that are determined by the Bank is the most effective policy tool of operational risk management.

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**27. FINANCIAL RISK MANAGEMENT (continued)**

**Fair value of financial instruments**

	<b>31 December 2021</b>	
	<b>Carrying amount</b>	<b>Fair value</b>
<b>Financial assets</b>		
Loans and advances	37,479,387	37,640,606
Financial assets measured at FVOCI	3,932,699	3,932,699
Investment securities at amortised cost	3,012,392	3,029,885
Money market placements	993,282	993,282
Cash at Banks	3,273,103	3,273,103
	<b>48,690,862</b>	<b>48,869,574</b>
<b>Financial liabilities</b>		
Obligations under repurchase agreements	629,707	629,707
Funds Provided from Other Financial Institutions	39,439,726	42,768,736
Subordinated loans	3,350,857	3,350,857
Sundry Creditors	210,813	210,813
	<b>43,631,103</b>	<b>46,960,113</b>
<b>31 December 2020</b>		
	<b>Carrying amount</b>	<b>Fair value</b>
<b>Financial assets</b>		
Loans and advances	20,252,345	20,349,308
Financial assets measured at FVOCI	964,894	964,894
Investment securities at amortised cost	1,716,908	1,729,151
Money market placements	1,499,794	1,499,794
Cash at Banks	3,555,698	3,555,698
	<b>27,989,639</b>	<b>28,098,845</b>
<b>Financial liabilities</b>		
Obligations under repurchase agreements	203,850	203,850
Funds Provided from Other Financial Institutions	22,007,957	22,598,523
Subordinated loans	1,993,243	1,993,243
Sundry Creditors	125,873	125,873
	<b>24,330,923</b>	<b>24,921,489</b>

(\*) Financial assets and liabilities presented above include interest accruals.

Methods and estimations used for the fair value determination of financial instruments which are not presented with their fair values in financial statements:

- i- For the fair value determination of loans, interest rates as of balance sheet date are considered,
- ii- For the fair value determination of banks, interest rates as of balance sheet date are considered,
- iii- For the fair value determination of investments held-to-maturity, market prices as of balance sheet date are considered.

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**27. FINANCIAL RISK MANAGEMENT (continued)**

**Fair value of financial instruments (continued)**

The fair values of financial assets and financial liabilities are determined as follows:

- Level 1: The fair value of financial assets and financial liabilities with standard terms and conditions and traded on active liquid markets are determined with reference to quoted market prices;
- Level 2: The fair value of other financial assets and financial liabilities (excluding derivative instruments) are determined in accordance with generally accepted pricing models based on discounted cash flow analysis using prices from observable current market transactions; and
- Level 3: The fair value of derivative instruments, are calculated using quoted prices, Where such prices are not available use is made of discounted cash flow analysis using the applicable yield curve for the duration of the instruments for non-optional derivatives, and option pricing models for optional derivatives.

<b>31 December 2021</b>	<b>Level 1</b>	<b>Level 2</b>	<b>Level 3</b>
<b>Financial assets FVOCI</b>	-	-	<b>220,867</b>
Debt securities	-	-	-
Share certificates	-	-	213,743
Other	-	-	7,124
<b>Financial assets FVPL</b>	<b>3,916,222</b>	-	<b>16,477</b>
Debt securities	3,916,222	-	-
Share certificates	-	-	<b>16,477</b>
Other	-	-	-
<b>Derivative financial assets</b>	-	<b>365</b>	-
<b>Derivative financial liabilities</b>	-	<b>26,993</b>	-
<b>31 December 2020</b>	<b>Level 1</b>	<b>Level 2</b>	<b>Level 3</b>
<b>Financial assets FVOCI</b>	<b>950,552</b>	-	<b>14,990</b>
Debt securities	950,552	-	-
Share certificates	-	-	14,990
Other	-	-	-
<b>Financial assets FVPL</b>	-	-	<b>119,725</b>

The table below shows the movement table of level 3 financial assets.

<b>Level 3 Movement Table</b>	<b>Current Period (31.12.2021)</b>
<b>Balance at the beginning of the period</b>	<b>134,715</b>
Purchases during the period	12,577
Disposals through sale/redemptions	(28,780)
Valuation effect	118,832
Transfers	-
<b>Balance at the end of the period</b>	<b>237,344</b>

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**28. SUBSEQUENT EVENTS**

The sale of the Bank's 212 Regional Fund II investment, headquartered in Luxembourg, to TKYB Capital Fund was made on 3 January 2022 and the remaining commitment as of the date of sale was transferred. The application made by the Bank for the issuance of bonds, bills and similar debt instruments up to a maximum of 400 million USD or equivalent foreign currency or Turkish Lira in total, to be made through one or more issuances, without public offering abroad, was approved by the Capital Markets Board on 27 January 2022.

With the Law on Evaluation of Immovable Property Owned by the Treasury No.7394 published in the Official Gazette numbered 31810, dated 15 April 2022 and Amendment of the Law on Value Added Tax and Article 26 of Amendment of Certain Laws and Decrees and with paragraph added to the temporary Article 13 of the Corporate Tax Law No.5520 corporate income tax rate for the taxation year period 2022 will be applied as 25% for corporate earnings. This amendment will be valid in the taxation of corporate earnings for the periods starting from 1 January 2022, starting with the declarations that must be submitted as of 1 July 2022.

With the approval of the BRSA on 4 March 2022, between the Bank and the TVF Piyasa İstikrar ve Denge Alt Fonu within the body of Türkiye Varlık Fonu Yönetimi A.Ş.; A subordinated loan agreement amounting to TL 1,500,000 to be included in the Additional Tier Capital calculation in accordance with the provisions of Article 7 of the "Regulation on Banks' Equity" of the BRSA was signed and the transaction was completed as of 9 March 2022.