TÜRKİYE İHRACAT KREDİ BANKASI ANONİM ŞİRKETİ

Financial Statements as at and for the Year Ended 31 December 2021 with Independent Auditor's Report Thereon

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INDEPENDENT AUDITOR'S REPORT

To the Shareholders of Türkiye İhracat Kredi Bankası Anonim Şirketi

1) Opinion

We have audited the accompanying financial statements of Türkiye İhracat Kredi Bankası Anonim Şirketi (the "Bank") which comprise the unconsolidated statement of financial position as at December 31, 2021, statement of profit or loss and statement of profit or loss and other comprehensive income, statement of changes in equity and statement of cash flows for the year then ended and the notes to the financial statements including a summary of significant accounting policies.

In our opinion, the accompanying financial statements present fairly, in all material respects, the unconsolidated financial position of the Bank as at December 31, 2021, and its financial performance and its cash flows for the year then ended in accordance with International Financial Reporting Standards (IFRS).

2) Basis for opinion

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 financial statements section of our report. We are independent of the Bank in accordance with the International Ethics Standards Board for Accountants' Code of Ethics for Professional Accountants (IESBA Code) together with the 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 these requirements and the IESBA Code. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

3) Key audit matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the unconsolidated financial statements of the current period. These matters were addressed in the context of our audit of the unconsolidated financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters. For each matter below, our description of how our audit addressed the matter is provided in that context.

We have fulfilled the responsibilities described in the Auditor's responsibilities for the audit of the unconsolidated financial statements section of our report, including in relation to these matters. Accordingly, our audit included the performance of procedures designed to respond to our assessment of the risks of material misstatement of the unconsolidated financial statements. The results of our audit procedures, including the procedures performed to address the matters below, provide the basis for our audit opinion on the accompanying unconsolidated financial statements.



Key Audit Matter

Financial impact of IFRS 9 "Financial Instruments" standard and recognition of impairment on financial assets and related important disclosures

As disclosed in footnote IX of Section 3; the Bank measured expected credit losses for financial assets by IFRS 9 "Financial Instruments Standards" in financial statements. The rationale for selecting IFRS 9 impairment of financial assets as key audit matter are as follows;

- Financial assets within balance-sheet and off-balance-sheet subject to IFRS 9 expected credit losses measurement have significant balance in the financial statements
- The applications IFRS 9 are complex and comprehensive
- The classification of financial instruments based on the Bank's business models and the characteristics of contractual cash flows in line with IFRS 9 and requirement of important judgments to determine this business model and the characteristics of contractual cash flows
- Risks related to the policies established by the management with the compliance and requirements of the legislation and other applications for the calculation of expected credit losses
- The complexity and intensity of the control environment in the processes designed or reorganized for IFRS 9
- Estimations and assumptions used in expected credit losses are important and complex
- Complex and comprehensive disclosure requirements of IFRS 9.

How the Key Audit Matter is addressed in our audit

Our audit procedures in addition to our current audit procedures:

- Evaluation of the compliance of the accounting policies adopted with regard to IFRS 9, the Bank's past performance, and local and global practices
- Analysis and testing of processes, systems, and controls originated or re-designed in order to calculate expected credit losses by the Information Systems and Process Audit specialists
- Evaluation of the key judgments, assumptions, methods used for calculation of expected credit loss determined by the management, and whether the data source is reasonable or not, and their compliance and standard requirements in light of industry and global practices
- Testing criteria used for determining the contractual cash flows including interest payments with regard to solely principal and principal balance of financial assets on a sample basis and evaluation of Bank's business model
- Evaluation of significant increase in credit risk, definition of default, definition of restructuring, probability of default, loss given default, exposure at default and macro-economic variables, and related basic and significant estimates and assumptions determined for calculation process of expected credit loss and whether these assumptions determined by financial risk management are in line with the Bank's historical performance, legislation, and reasonableness of the estimation process regarding future performance and investigation of credit risk portfolio on a sample basis
- Evaluation of the accuracy and completeness of attributes of the data used for the calculation process of expected credit losses
- Detailed testing of mathematical verification of expected credit losses' calculation on a sample basis
- Evaluating the necessity and accuracy of the updates made or required updates after the modeling process
- Evaluating the impact of the Covid-19 outbreak, on macroeconomic variables in staging loans and calculating expected credit loss provision, together with important forward estimates and assumptions
- Auditing of disclosures related to IFRS 9.



Key audit matter	How the matter was addressed in our audit
Hedge Accounting	THE LANGE OF STREET STREET, ST
As further explained in footnote VIII of Section 3, the Bank applies fair value hedge transactions to manage fixed interest rate risk due to securities issued at fixed rate with interest rate swap transactions. The Bank applies cash flow hedge transactions to manage foreign currency risk due to securities issued at fixed rate and loans and advances at floating rate with cross-currency swap transactions. The criteria for the application of the hedge accounting include defining, documenting and regularly testing the effectiveness of the hedge accounting transactions. Due to the fact that hedge accounting has complex structure and requires technical calculations, we considered this to be one of the key audit matters.	 The audit procedures for testing hedge accounting included below; To examine the documentation and appropriateness of hedging relationships of cash flow hedge and fair value hedge transactions. To take into account the objective of the hedge accounting and its compliance with TFRS requirements. To test the management's assessment of effectiveness, measuring ineffectiveness and appropriateness of accounting records. To understand and test the hedge accounting controls, hedging relationship, the effectiveness controls at inception and at subsequent periods. To evaluate the adequacy of the unconsolidated financial statement disclosures related to hedge accounting.

4) Responsibilities of Management and Those Charged with Governance for the Financial Statements

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

In preparing the financial statements, management is responsible for assessing the Bank'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 Bank or to cease operations, or has no realistic alternative but to do so.

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



5) Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the 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 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 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
 Bank'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 Bank'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 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 Bank to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation



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 financial statements of the current period 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.

The partner in charge of the audit resulting in this independent auditor's report is Fatma Ebru Yücel.

Güney Bağımsız Denetim ve Serbest Muhasebeci Mali Müşavirlik Anonim Şirketi

A member firm of Ernst & Young Global Limited

Fatma Ebru Yücel, SMMM Partner

İstanbul, Türkiye April 29, 2022

STATEMENT OF FINANCIAL POSITION AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated)

	Notes	Audited 31 December 2021	Audited 31 December 2020
ASSETS			
Cash and due from banks	6	19,480,810	11,681,430
Derivative financial instruments	7	40,982	26,224
Derivative assets held for risk management	4	1,498,107	466,113
Loans and advances	8	286,483,564	177,630,921
Investment securities	J	200, 103,301	177,030,921
-Financial assets measured at fair value through profit or loss	9	178,275	153,454
-Financial assets measured at fair value through profit or loss		170,273	133,434
pledged	9	111,458	72,786
-Financial assets measured at fair value through other		,	,
comprehensive income	9	1,391,467	805,309
-Financial assets measured at fair value through other			
comprehensive income pledged	9	750,209	439,424
-Financial assets measured at amortized cost	9	9,955,982	10,637,542
-Financial assets measured at amortized cost pledged	9	9,824,729	1,519,521
Subsidiaries (Net)		73,000	-
Property and equipment	10	10,519	17,566
Intangible assets	11	12,752	10,185
Investment property	12	2,008	2,111
Other assets	13	1,111,190	1,637,715
Total assets		320,238,656	203,068,570
LIABILITIES Funds borrowed	1.4	249,217,267	160,095,708
Debt securities issued	14	, ,	
	15	37,284,304	22,953,260
Interbank money market deposits Subordinated liabilities	14	6,517,681	1,375,566
	16	5,523,837	4,463,576
Other liabilities and provisions Lease liabilities	18	6,987,729	1,936,208
	18	5,923	12,533
Derivative financial instruments	7	638	114,929
Derivative liabilities held for risk management	4	116,339	676,199
Retirement benefit obligations	19	33,824	26,331
Total liabilities		305,687,542	191,654,310
EQUITY	20		
- Share capital	20	10,800,000	9,270,000
- Adjustment to share capital		38,091	38,091
Total paid in share capital		10,838,091	9,308,091
Legal reserves			
<u> </u>		569,768	494,199
Hedging reserves		73,439	33,017
Fair value reserves Retained earnings		6,856 3,062,960	116,279 1,462,674
		3,502,700	1,102,074
Total equity		14,551,114	11,414,260
Total liabilities and equity		320,238,656	203,068,570

The accompanying notes form an integral part of these financial statements.

STATEMENT OF PROFIT OR LOSS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

	Notes	Audited 1 January – 31 December 2021	Audited 1 January – 31 December 2020
Interest income	21	7,190,739	5,011,499
Interest expense	21	(4,388,430)	(3,788,554)
Net interest income		2,802,309	1,222,945
Fees and commission income		924,520	573,966
Fees and commission expense		(493,868)	(349,550)
Net fee and commission income	9	430,652	224,416
Impairment losses on loans and advances Foreign exchange gain/(losses), net	9 22	(134,190) (1,380,172)	(369,469) 2,384,657
Gains/(losses) on financial assets through profit or loss, net	23	2,023,245	(1,539,815)
Dividend income		200	89
Other operating income		28,683	14,766
Operating profit before operating expenses		3,770,727	1,937,589
Operating expenses	24	(664,210)	(426,201)
Net profit for the period		3,106,517	1,511,388

The accompanying notes form an integral part of these financial statements.

STATEMENT OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated)

	Audited 1 January – 31 December 2021	Audited 1 January – 31 December 2020
Net profit for the period	3,106,517	1,511,388
Other comprehensive income	(69,663)	71,845
Total Comprehensive Income	(662)	-
Items that will not be reclassified to profit or loss	21,998	206
Remeasurements of the defined benefit asset/(liability)	21,998	206
Items that are or may be reclassified to profit or loss Net change in fair values of financial assets measured at fair	(90,999)	71,639
value through other comprehensive income	(131,421)	87,621
Cash flow hedges - effective portion of changes in fair value	40,422	(15,982)
Total comprehensive income for the period	3,036,854	1,583,233

STATEMENT OF CHANGES IN EQUITY FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated)

	Notes	Share capital	Adjustment to share capital	Total paid-in share capital	Legal reserves	Other reserves	Hedging reserves	Fair value reserves	Retained earnings	Total equity
Balance at 1 January 2020	20	7,160,000	38,091	7,198,091	422,618	-	48,999	28,658	1,382,661	9,081,027
Profit for the period Other comprehensive income for the period		-	-	- -	-	-	(15,982)	87,621	1,511,388 206	1,511,388 71,845
Total comprehensive income		-	-	-	-	-	(15,982)	87,621	1,511,594	1,583,233
Capital increase Dividends to equity holders	20	2,110,000	-	2,110,000	-	-	-	-	(1,360,000)	750,000
Transfers to legal reserves		-	-	-	71,581	-	-	-	(71,581)	-
(Audited) Balance at 31 December 2020	20	9,270,000	38,091	9,308,091	494,199	-	33,017	116,279	1,462,674	11,414,260
Balance at 1 January 2021	20	9,270,000	38,091	9,308,091	494,199	-	33,017	116,279	1,462,674	11,414,260
Profit for the period Other comprehensive income for the period		-	-	-	-	-	40,422	(109,423)	3,106,517 (662)	3,106,517 (69,663)
Total comprehensive income		-	-	-	-	-	40,422	(109,423)	3,105,855	3,036,854
Capital increase (*)		1,530,000	-	1,530,000	-	-	-	-	(1,430,000)	100,000
Dividends to equity holders Transfers to legal reserves		-	-	-	75,569	-	-	-	(75,569)	-
(Audited) Balance at 31 December 2021	20	10,800,000	38,091	10,838,091	569,768	-	73,439	6,856	3,062,960	14,551,114

^(*) TL 100,000 was paid in cash by the Ministry of Treasury and Finance.

The accompanying notes form an integral part of these financial statements.

STATEMENT OF CASH FLOWS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated)

	Notes	Audited 1 January – 31 December 2021	Audited 1 January – 31 December 2020
Cash flows from operating activities:			
Net profit for the period		3,106,517	1,511,388
Adjustments:			
Depreciation and amortization	25	12,133	10,602
Provision for loan losses	8	134,190	369,469
Provision for employment termination benefits	25	6,830	_
Provision for unused vacation	18	2,062	51
Net gain on sale of property and equipment		110	(2.000.650)
Interest paid		(2,028,392)	(2,080,658)
Interest received		6,344,756	4,836,662
Unrealized foreign exchange differences		(7,127,954)	(1,604,561)
Remeasurement of derivative financial instruments		(1,720,903)	1,603,599
Net Cash flows from operating activities		(1,270,651)	4,646,552
Net decrease/(increase) in loans and advances		(108,986,833)	(35,658,318)
Net decrease/(increase) in financial assets at measured fair value through		, , , ,	, , , ,
profit or loss		(24,821)	(153,454)
Net decrease/(increase) in other assets		2,858,876	808,324
Net increase in other liabilities		(1,149,244)	(5,183,274)
Net cash from operating activities		(108,572,673)	(35,540,170)
Cash flows from/(used in) investing activities:			
Acquisition of property and equipment, net	10	(1,003)	(3,427)
Acquisition of financial assets measured at amortized cost	9	(1,500)	(1,724,460)
Proceeds from financial assets measured at amortized cost	9	6,423,913	-
Increase from financial assets measured at fair value through other		222.502	1 640 505
comprehensive income		233,582	1,649,507
Decrease from financial assets measured at fair value through other		(146.505)	(076 041)
comprehensive income	11	(146,505)	(976,841)
Acquisition of intangible assets	11	(5,062)	(4,567)
Net cash used in investing activities		6,503,425	(1,059,788)
Cash flows from/(used in) financing activities:			
Proceeds from borrowings		357,395,256	33,222,947
Repayments of borrowings		(269,432,699)	(2,084,517)
Proceeds from interbank money market deposits	14	5,142,115	1,375,566
Proceeds from issue of debt securities		14,115,991	3,812,142
Increase/(decrease) due to issue of subordinated liabilities		-	-
Repayment of debt securities		(2,076,959)	(1,682,468)
Dividends paid	20	-	-
Proceeds from capital increase	20	100,000	750,000
Purchase of the subsidiaries		(73,000)	-
Net cash from/(used in) financing activities		105,170,704	35,393,670
Effects of exchange-rate changes on cash and cash equivalents		5,879,648	3,655,583
Net increase/(decrease) in cash and cash equivalents		7,808,788	1,681,808
	6	11,670,056	9,988,248
Cash and cash equivalents at the beginning of the year	Ü	, ,	- , ,

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

1 GENERAL INFORMATION ABOUT THE BANK

Türkiye İhracat Kredi Bankası A.Ş. (the "Bank" or "Eximbank") was established as Turkey's "Officially Supported Export Credit Agency" on 25 March 1987 as a development and investment bank and accordingly, the Bank does not accept deposits. The Bank's head office is located at Saray Mahallesi, Ahmet Tevfik İleri Caddesi 19 Ümraniye Istanbul/Turkey. As of 31 December 2021, the Bank has 3 regional directorates in Ankara, İstanbul and in İzmir, 20 branches and 11 liaison offices. As of 31 December 2021, the Bank has 734 employees (31 December 2020: 740 employees).

The Bank's objective is to improve foreign trade, diversify exported goods and services, create new markets for the exported commodities, increase the share of exporters, entrepreneurs and contractors in international trade by providing assurance to increase their competitiveness, encourage and support the manufacturing and sale export or foreign currency gaining investment products.

As a means of aiding export development services, the Bank provides loan, guarantee and insurance services in order to financially support export and foreign currency earning services. While performing the above-mentioned operations, the Bank provides short, medium or long term, domestic and foreign currency lending funded by borrowings from domestic and foreign money and capital markets and from its own sources.

On the other hand, the Bank also performs fund management (treasury) operations related to its core banking operations. These operations are domestic and foreign currency capital market operations, domestic and foreign currency money market operations, foreign currency market operations, derivative transactions, all of which are approved by the Board of Directors.

The losses due to the political risks arising on loan, guarantee and insurance operations of the Bank, are transferred to the Undersecretariat of Treasury ("Turkish Treasury") according to article 4/c of Act number 3332 that was appended by Act numbered 3659 and according to Act regarding the Public Financing and Debt Management, numbered 4749, dated 28 March 2002.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

2 BASIS OF PREPARATION

2.1 Statement of compliance

The financial statements have been prepared in accordance with International Financial Reporting Standards (IFRSs) as issued by the International Accounting Standards Board ("IASB").

The Bank maintains its books of account and prepares its statutory financial statements in Turkish Lira ("TL") in accordance with the accounting practices as promulgated by the Banking Regulation and Supervision Agency ("BRSA"), the Turkish Commercial Code and the Turkish Tax Legislation.

These financial statements have been prepared in accordance with IFRS. They were authorized for issue by the Bank's Board of Directors on 29 March 2022.

As of 31 December 2020, in preparation of the financial statements of the Bank, the same accounting policies and methods of computation have been followed compared to the most recent annual financial statements. New IFRS/IAS amendments in effect do not have significant impact on the accounting policies, financial position and performance of the Bank.

2.2 Basis of measurement

The financial statements have been prepared on the historical cost basis as adjusted for the effects of inflation that lasted until 31 December 2005, except for the following assets and liabilities which are stated at their fair values if reliable measures are available: financial assets measured at fair value through profit or loss, derivative financial assets and liabilities and financial assets measured at fair value through other comprehensive income.

2.3 Functional and reporting currency

These financial statements are presented in TL, which is the Bank's functional currency. Except as indicated, the financial information presented in TL has been rounded to the nearest thousand.

2.4 Accounting in hyperinflationary countries

Financial statements of the Turkish entities have been restated for the changes in the general purchasing power of the Turkish Lira based on IAS 29 – Financial Reporting in Hyperinflationary Economies as at 31 December 2005. IAS 29 requires that financial statements prepared in the currency of a hyperinflationary economy be stated in terms of the measuring unit current at the reporting date, and that corresponding figures for previous years be restated in the same terms. One characteristic that necessitates the application of IAS 29 is a cumulative three-year inflation rate approaching or exceeding 100%. The cumulative three-year inflation rate in Turkey was 35.61% as at 31 December 2005, based on the Turkish nation-wide wholesale price indices announced by the Turkish Statistical Institute ("TURKSTAT"). This, together with the sustained positive trend in quantitative factors, such as the stabilization in capital and money markets, decrease in interest rates and the appreciation of TL against the USD and other hard currencies have been taken into consideration to categorize Turkey as a non-hyperinflationary economy under IAS 29 effective from 1 January 2006.

According to the decision of Public Oversight Accounting and Auditing Standards Authority in Turkey released on 20 January 2022, it has been stated that there is no need to make any adjustments within the scope of Turkish Accounting Standards ("TAS") 29 Financial Reporting in Hyperinflationary Economie"s in the financial statements of 2021, of enterprises that apply IFRS. In this context, while preparing the financial statements dated 31 December 2021, no inflation adjustment was made according to IAS 29.

Total capital amount and capital adequacy ratio have been calculated in accordance with the "Regulation on Equity of Banks", "Regulation on Measurement and Assessment of Capital Adequacy of Banks" and "Board Decisions" in Turkey. The Bank's and its financial subsidiaries' regulatory capital position on a consolidated basis as at 31 December 2021 and 31 December 2020 is as follows:

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

2 BASIS OF PREPARATION (continued)

2.5 Use of estimates and judgments

The preparation of the financial statements requires management to make judgments, estimates and assumptions that affect the application of accounting policies and the reported amounts of assets, liabilities, income and expenses. Actual results may differ from these estimates.

Estimates and underlying assumptions are reviewed on an ongoing basis. Revisions to accounting estimates are recognized in the period in which the estimate is revised and in any future periods affected.

Coronavirus pandemic, which has recently emerged in China, spread to various countries around the world affects global economic conditions negatively, as well as causing malfunctions in operations, especially in countries exposed to the epidemic. As a result of the spread of COVID-19 throughout the world, various measures have been taken in Turkey as well as in the world and still continue to be taken in order to prevent the transmission of the virus. In addition to these measures, economic measures are also taken to minimize the economic impact of the virus outbreak on individuals and businesses in Turkey and worldwide. The necessary measures are evaluated by the bank management to keep the negative effects that may arise under control and to live at the minimum level.

Particularly, information about significant areas at estimation, uncertainty and critical judgment in applying accounting policies that have the most significant effect on the amounts recognized in the financial statements are described below:

- Note 4 Derivative instruments held for risk management
- Note 6 Cash and due from banks
- Note 7 Derivative financial assets and liabilities
- Note 8 Loans and advances
- Note 13 Other assets
- Note 16 Other liabilities and provisions

2.6. Changes in accounting policies

The accounting policies adopted in preparation of the financial statements as at December 31, 2021 are consistent with those of the previous financial year, except for the adoption of new and amended IFRS and IFRIC interpretations effective as of 1 January 2021. The effects of these standards and interpretations on the bank's financial position and performance have been disclosed in the related paragraphs.

The new standards, amendments and interpretations which are effective as at 1 January 2021 are as follows:

i) Standards issued but not vet effective and not early adopted

Standards, interpretations and amendments to existing standards that are issued but not yet effective up to the date of issuance of the financial statements are as follows. The Bank will make the necessary changes if not indicated otherwise, which will be affecting the financial statements and disclosures, when the new standards and interpretations become effective.

IFRS 10 and IAS 28: Sale or Contribution of Assets between an Investor and its Associate or Joint Venture (Amendments)

In December 2015, the IASB postponed the effective date of this amendment indefinitely pending the outcome of its research project on the equity method of accounting. Early application of the amendments is still permitted. The Bank will wait until the final amendment to assess the impacts of the changes.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

2 BASIS OF PREPARATION (continued)

IFRS 17 - The new Standard for insurance contracts

The IASB issued IFRS 17, a comprehensive new accounting standard for insurance contracts covering recognition and measurement, presentation and disclosure. IFRS 17 model combines a current balance sheet measurement of insurance contract liabilities with the recognition of profit over the period that services are provided. Certain changes in the estimates of future cash flows and the risk adjustment are also recognised over the period that services are provided. Entities will have an option to present the effect of changes in discount rates either in profit and loss or in OCI. The standard includes specific guidance on measurement and presentation for insurance contracts with participation features. IFRS 17 will become effective for annual reporting periods beginning on or after 1 January 2023; early application is permitted. In accordance with amendments issued in December 2021, entities have transition option for a "classification overlay" to avoid possible accounting mismatches between financial assets and insurance contract liabilities in the comparative information presented on initial application of IFRS 17. The Bank is in the process of assessing the impact of the standard on financial position or performance of the Bank.

Amendments to IAS 1- Classification of Liabilities as Current and Non-Current Liabilities

23 January 2020, the IASB issued amendments to IAS 1 Presentation of Financial Statements. The amendments issued to IAS 1 which are effective for periods beginning on or after 1 January 2022, clarify the criteria for the classification of a liability as either current or non-current. Amendments must be applied retrospectively in accordance with IAS 8 Accounting Policies, Changes in Accounting Estimates and Errors. Early application is permitted. The Bank is in the process of assessing the impact of the amendments on financial position or performance of the Bank.

Amendments to IAS 8 - Definition of Accounting Estimates

In February 2021, the Board issued amendments to IAS 8, in which it introduces a new definition of 'accounting estimates'. The amendments issued to IAS 8 are effective for annual periods beginning on or after 1 January 2023. The amendments clarify the distinction between changes in accounting estimates and changes in accounting policies and the correction of errors. Also, they clarify how entities use measurement techniques and inputs to develop accounting estimates. The amended standard clarifies that the effects on an accounting estimate of a change in an input or a change in a measurement technique are changes in accounting estimates if they do not result from the correction of prior period errors. The previous definition of a change in accounting estimate specified that changes in accounting estimates may result from new information or new developments. Therefore, such changes are not corrections of errors. This aspect of the definition was retained by the Board. The Bank is in the process of assessing the impact of the amendments on financial position or performance of the Bank.

Amendments to IAS 1 and IFRS Practice Statement 2 - Disclosure of Accounting Policies

In February 2021, the Board issued amendments to IAS 1 and IFRS Practice Statement 2 Making Materiality Judgements, in which it provides guidance and examples to help entities apply materiality judgements to accounting policy disclosures. The amendments issued to IAS 1 are effective for annual periods beginning on or after 1 January 2023. In the absence of a definition of the term 'significant' in IFRS, the Board decided to replace it with 'material' in the context of disclosing accounting policy information. 'Material' is a defined term in IFRS and is widely understood by the users of financial statements, according to the Board. In assessing the materiality of accounting policy information, entities need to consider both the size of the transactions, other events or conditions and the nature of them. Examples of circumstances in which an entity is likely to consider accounting policy information to be material have been added. The Bank is in the process of assessing the impact of the amendments on financial position or performance of the Bank.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

2 BASIS OF PREPARATION (continued)

Amendments to IAS 12 – Deferred Tax related to Assets and Liabilities arising from a Single Transaction

In May 2021, the Board issued amendments to IAS 12, which narrow the scope of the initial recognition exception under IAS 12, so that it no longer applies to transactions that give rise to equal taxable and deductible temporary differences. The amendments issued to IAS 12 are effective for annual periods beginning on or after 1 January 2023. The amendments clarify that where payments that settle a liability are deductible for tax purposes, it is a matter of judgement (having considered the applicable tax law) whether such deductions are attributable for tax purposes to the liability recognised in the financial statements (and interest expense) or to the related asset component (and interest expense). This judgement is important in determining whether any temporary differences exist on initial recognition of the asset and liability. The Bank is in the process of assessing the impact of the amendments on financial position or performance of the Bank.

Amendments to IFRS 3 – Reference to the Conceptual Framework

In May 2020, the IASB issued amendments to IFRS 3 Business combinations. The amendments are intended to replace to a reference to a previous version of the IASB's Conceptual Framework (the 1989 Framework) with a reference to the current version issued in March 2018 (the Conceptual Framework) without significantly changing requirements of IFRS 3. At the same time, the amendments add a new paragraph to IFRS 3 to clarify that contingent assets do not qualify for recognition at the acquisition date. The amendments issued to IFRS 3 which are effective for periods beginning on or after 1 January 2022 and must be applied retrospectively. Earlier application is permitted if, at the same time or earlier, an entity also applies all of the amendments contained in the Amendments to References to the Conceptual Framework in IFRS standards (March 2018).

The amendments are not applicable for the Bank and will not have an impact on the financial position or performance of the Bank.

Amendments to IAS 16 – Proceeds before intended use

In May 2020, the IASB issued amendments to IAS 16 Property, plant and equipment. The amendment prohibits entities from deducting from the cost of an item of property, plant and equipment (PP&E), any proceeds of the sale of items produced while bringing that asset to the location and condition necessary for it to be capable of operating in the manner intended by management. Instead, an entity recognizes the proceeds from selling such items, and costs of producing those items, in profit or loss. The amendments issued to IAS 16 which are effective for periods beginning on or after 1 January 2022. Amendments must be applied prospectively only to items of PP&E made available for use on or after beginning of the earliest period presented when the entity first applies the amendment. There is no transition relief for the first time adopters. The Bank is in the process of assessing the impact of the amendments on financial position or performance of the Bank.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

2 BASIS OF PREPARATION (continued)

Amendments to IAS 37 – Onerous contracts – Costs of Fulfilling a Contract

In May 2020, the IASB issued amendments to IAS 37 Provisions, Contingent Liabilities and Contingent assets. The amendments issued to IAS 37 which are effective for periods beginning on or after 1 January 2022, to specify which costs an entity needs to include when assessing whether a contract is onerous or loss-making and also apply a "directly related cost approach". Amendments must be applied retrospectively to contracts for which an entity has not fulfilled all of its obligations at the beginning of the annual reporting period in which it first applies the amendments (the date of initial application). Earlier application is permitted and must be disclosed.

The Bank is in the process of assessing the impact of the amendments on financial position or performance of the Bank.

Interest Rate Benchmark Reform – Phase 2 – Amendments to IFRS 9, IAS 39, IFRS 7, IFRS 4 and IFRS 16

In August 2020, the IASB issued Interest Rate Benchmark Reform – Phase 2, Amendments to IFRS 9, IAS 39, IFRS 7, IFRS 4 and IFRS 16 to provide temporary reliefs which address the financial reporting effects when an interbank offering rate (IBOR) is replaced with an alternative nearly risk-free rate (RFR, amending the followings:

Practical expedient for changes in the basis for determining the contractual cash flows as a result of IBOR reform

The amendments include a practical expedient to require contractual changes, or changes to cash flows that are directly required by the reform, to be treated as changes to a floating interest rate, equivalent to a movement in a market rate of interest. Under this practical expedient, if the interest rates applicable to financial instruments change as a result of the IBOR reform, the situation is not considered as a derecognition or contract modification; instead, this would be determined by recalculating the carrying amount of the financial instrument using the original effective interest rate to discount the revised contractual cash flows.

The practical expedient is required for entities applying IFRS 4 Insurance Contracts that are using the exemption from IFRS 9 Financial Instruments (and, therefore, apply IAS 39 Financial Instruments: Classification and Measurement) and for IFRS 16 Leases, to lease modifications required by IBOR reform.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

2 BASIS OF PREPARATION (continued)

Relief from discontinuing hedging relationships

- The amendments permit changes required by IBOR reform to be made to hedge designations and hedge documentation without the hedging relationship being discontinued.
- Amounts accumulated in the cash flow hedge reserve are deemed to be based on the RFR.
- For the IAS 39 assessment of retrospective hedge effectiveness, on transition to an RFR, entities may elect on a hedge-by-hedge basis, to reset the cumulative fair value changes to zero.
- The amendments provide relief for items within a designated group of items (such as those forming part of a macro cash flow hedging strategy) that are amended for modifications directly required by IBOR reform. The reliefs allow the hedging strategy to remain and not be discontinued.
- As instruments transition to RFRs, a hedging relationship may need to be modified more than once. The phase two reliefs apply each time a hedging relationship is modified as a direct result of IBOR reform.

Separately identifiable risk components

The amendments provide temporary relief to entities from having to meet the separately identifiable requirement when an RFR instrument is designated as a hedge of a risk component.

Additional disclosures

Amendments need additional IFRS 7 Financial Instruments disclosures such as; How the entity is managing the transition to RFRs, its progress and the risks to which it is exposed arising from financial instruments due to IBOR reform, quantitative information about financial instruments that have yet to transition to RFRs and if IBOR reform has given rise to changes in the entity's risk management strategy, a description of these changes.

The amendments are mandatory, with earlier application permitted. While application is retrospective, an entity is not required to restate prior periods. The amendments did not have a significant impact on the financial position or performance of the Bank.

In order to manage the transition to RFRs the Bank has prepared a detail action plan where related units within the Bank are entitled to their duties which are explained in detail and are scheduled. Decisions and announcements by the financial authorities are closely kept up with and integrated into the transition management within the Bank.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

2 BASIS OF PREPARATION (continued)

Amendments to IFRS 16 - Covid-19-Related Rent Concessions and Covid-19-Related Rent Concessions beyond 30 June 2021

In May 2020, the IASB amended IFRS 16 to provide relief to lessees from applying the IFRS 16 guidance on lease modifications to rent concessions arising as a direct consequence of the covid-19 pandemic (2020 amendment). The 2020 amendment does not apply to lessors. In March 2021, the Board amended IFRS 16 to extend the availability of the practical expedient by one year (2021 amendment). The practical expedient in the 2021 amendment applies to rent concessions for which any reduction in lease payments affects only payments originally due on or before 31 December 2022, provided the other conditions for applying the practical expedient are met. The amendment applies to annual reporting periods beginning on or after 1 April 2021.

The amendments did not have a significant impact on the financial position or performance of the Bank.

ii) Annual Improvements – 2018–2020 Cycle

In May 2020, the IASB issued Annual Improvements to IFRS Standards 2018–2020 Cycle, amending the followings:

- IFRS 1 First-time Adoption of International Financial Reporting Standards Subsidiary as a first-time adopter: The amendment permits a subsidiary to measure cumulative translation differences using the amounts reported by the parent. The amendment is also applied to an associate or joint venture.
- IFRS 9 Financial Instruments Fees in the "10 per cent test" for derecognition of financial liabilities: The amendment clarifies the fees that an entity includes when assessing whether the terms of a new or modified financial liability are substantially different from the terms of the original financial liability. These fees include only those paid or received between the borrower and the lender, including fees paid or received by either borrower or lender on the other's behalf.
- IAS 41 Agriculture Taxation in fair value measurements: The amendment removes the requirement in paragraph 22 of IAS 41 that entities exclude cash flows for taxation when measuring fair value of assets within the scope of IAS 41.

Improvements are effective for annual reporting periods beginning on or after 1 January 2022. Earlier application is permitted for all.

The Bank is in the process of assessing the impact of the amendments on financial position or performance of the Bank.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

3 SIGNIFICANT ACCOUNTING POLICIES

The accounting policies set out below have been applied consistently by the Bank to prior periods presented in these financial statements.

3.1 Foreign currency

i) Foreign currency transactions

Transactions are recorded in TL, which is the Bank's functional currency. Transactions denominated in foreign currencies are recorded at the exchange rates ruling at the dates of the transactions. Monetary assets and liabilities denominated in foreign currencies on the reporting date are retranslated to the functional currency at the exchange rate on that date. Foreign currency differences arising on retranslation are recognized in profit or loss and other comprehensive income statement. Non-monetary assets and liabilities that are measured in terms of historical cost in a foreign currency are translated using the exchange rate at the date of the transaction.

The official TL exchange rates used by the Bank for foreign currency translation are as follows:

	EUR / TL	USD / TL
31 December 2021	14.9047	13.1865
31 December 2020	9.0512	7.3647

ii) Foreign currency operations

The assets and liabilities are translated into presentation currency of the Bank at the rate of exchange ruling at the reporting date.

3.2 Interest income and expense

Interest income and expense are recognized in profit or loss using the effective interest method. The effective interest rate is the rate that exactly discounts the estimated future cash payments and receipts through the expected life of the financial asset or liability (or, where appropriate, a shorter period) to the carrying amount of the financial asset or liability.

When calculating the effective interest rate, the Bank estimates cash flows considering all contractual terms of the financial instrument (for example, prepayment, call and similar options) but does not consider future credit losses. The calculation includes all fees and points 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.

Interest income and expense presented in the statement of profit or loss and other comprehensive income:

- interest on financial assets and financial liabilities measured at amortized cost calculated on an effective interest basis;
- interest for financial assets measured at fair value through other comprehensive income calculated on an effective interest basis,

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

3 SIGNIFICANT ACCOUNTING POLICIES (continued)

3.3 Fees and commission and premium income and expense

Fees and commission income and expenses that are integral to the effective rate on a financial asset or liability are included in the measurement of the effective rate.

Other fees and commission income, including account servicing fees, investment management fees, sales commissions, placement fees and syndication fees, are recognized as the related services are performed in accordance with IFRS 15 Revenue from contracts with customers. When a loan commitment is not expected to result in the draw-down of a loan, loan commitment fees are recognized on a straight-line basis over the commitment period.

Premium income and expense

Insurance programs of the Bank are composed of two schemes: short-term export credit insurance and medium and long-term export credit insurance. Premium income of the Bank under these two schemes represents premiums on policies written during the year, net of cancellations.

In addition, since commencement of the insurance facility, the Bank has sought to reinsure the major portion (currently 60%) of its underwritten short-term commercial risks based on a quota-share treaty concluded with a group of domestic and overseas reinsurance companies. Accordingly, expenses include the premiums paid to reinsurance companies. Premium income and expense representing reinsurer's share of the premium are recognized in the financial statements on accrual basis over the period of related policy.

Reinsurance commissions

Reinsurance commission income received in relation to ceded premiums is recognized on an accrual basis.

3.4 Net trading income

Net trading income is composed of realized and unrealized net gains and losses due to the changes in the fair values of trading assets and liabilities, except for the unrealized gains of financial assets measured at fair value through other comprehensive income.

3.5 Dividends

Dividend income is recognized when the right to receive the income is established.

3.6 Leases

IFRS 16 Leases standard abolishes the dual accounting model currently applied for lessees through recognizing finance leases in the balance sheet whereas not recognizing operational lease. Instead, a balance sheet based single accounting model similar to the accounting of finance leases is set forth. For lessors, the accounting stays almost the same. For lessees, the accounting continues similarly to the present applications on a significant level. At the date of initial application, this standard is applied with a modified retrospective approach recognizing the cumulative effect of initially applying the standard. In this context, comparative information is not restated.

A lease liability and a right-of-use asset are recognized at the date of initial application for leases previously classified as an operating lease in accordance with IAS 17. The mentioned lease liability is measured at the present value of the remaining lease payments, discounted using the Bank's incremental borrowing rate at the date of initial application. Besides, that right-of-use asset is measured at an amount equal to the lease liability, adjusted by the amount of any prepaid or accrued lease payments relating to that lease recognized in the statement of financial position immediately before the date of initial application.

Leases with a period equal or less than twelve months are evaluated in the scope of the exception given by the standard and payments made according to related contracts are still being accounted as expense in the period of the payments.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

3 SIGNIFICANT ACCOUNTING POLICIES (continued)

3.7 Income tax expense

According to Act number 3332 and article 4/b of Act number 3659, dated 25 March 1987 and 26 September 1990, respectively, the Bank is exempt from Corporate Tax. Due to the 3rd Article of the same act; the above-mentioned exemption became valid from 1 January 1988. In accordance with clause 9 of the Provisional Article 1 of Corporate Tax Law No. 5520, which states "The provision of Article 35 shall not apply to exemptions, allowances and deductions included in other laws in relation to Corporation Tax prior to the effective date of the Law No. 5520", the exemption from Corporation Tax continues. Accordingly, current tax and deferred tax are not recognized in these financial statements.

3.8 Explanations on forward transactions, options and derivative instruments

The Bank uses derivative financial instruments in order to avoid exposure to foreign currency and interest rate risks.

As of the balance sheet date, there are outstanding currency and interest rate swap purchase and sales contracts and forward transactions in TL and foreign currency.

Derivatives are initially recorded in profit or loss with their fair values and related transaction costs as of the contract date. In the following periods of initial reporting, they are measured at their fair values. The result of this assessment, offsetting debit and credits stemming from each contract are netted off and reflected to the financial statements as a contract-based single asset and liability. The method of accounting the formed gain or loss changes according to the whether the related derivative transaction is hedge purposed or not and the content of the item subject to hedge accounting.

a.) Financial assets measured at fair value through profit or loss

a.1.) Derivative financial assets

Derivative financial instruments other than derivative instruments intended for the fair value hedging and cash flow hedge purposes of the Bank are accounted for as "trading purpose", economically providing effective protection against risks for the Bank. Liabilities and receivables arising from derivative transactions are recorded in off-balance sheet accounts at contractual amounts. Derivative financial instruments are measured at fair value in subsequent periods and if the fair value is positive, they are classified under "derivative financial assets measured at fair value through profit or loss". If fair value is negative derivative transactions are classified under "derivative financial liabilities measured at fair value through profit or loss". After valuation, differences of changes in fair value are reflected in the statement of profit or loss.

a.2.) Derivative financial assets held for hedging purpose

The Bank notifies in written the relationship between hedging instrument and related account, risk management aims of hedge and strategies and the methods using to measure of the hedge effectiveness.

The Bank evaluates the method of hedge whether to be effective on the expected changes in fair values in this process or not or each result of hedge effectiveness whether to be between the range of 80% and 125%.

Changes in fair values of derivative transactions under fair value hedges are recorded in profit or loss together with changes in hedging asset or liability. The difference in current values of derivative transactions fair value hedge is shown in "Gains/Losses on derivative financial instruments" account. In the statement of financial position, change in fair value of hedged asset or liability during the hedge accounting to be effective is shown with the related asset or liability. In case of inferring hedge accounting, corrections made to the value of hedge account using straight-line amortization method within the days to maturity are reflected to "Income/losses from derivative financial instruments" account in the statement of profit or loss.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

3 SIGNIFICANT ACCOUNTING POLICIES (continued)

b.) Financial assets measured at fair value through other comprehensive income

b.1.) Derivative financial instruments held for hedging

The Bank hedges its cash flow risk arising from floating-rate liabilities in foreign currency and TL by cross-currency swaps. In this context, the fair value changes of the effective portion of the hedging instruments are accounted under the "hedging reserves" account within equity. In the period in which the cash flows affect the statement of profit or loss for the hedged item, the hedging instrument relating to the profit/loss is extracted from equity and recognized in the statement of profit or loss.

The hedge accounting is discontinued when the hedging instrument expires, is exercised, sold or no longer effective. While expiring, sale, discontinuing cash flow hedge accounting or when no longer effective, the cumulative gains/losses recognized in shareholders' equity and presented under hedging reserves are continued to be kept in this account. When the cash flows of hedged item incur, the gain/losses accounted for under shareholders' equity are transferred to statement of profit or loss.

Effectiveness tests are performed at the beginning of the hedge accounting period and at each reporting period. The hedge accounting is applied as long as the test results are between the range of 80%-125% of effectiveness.

IFRS 9 permits to defer application of IFRS 9 hedge accounting and continue to apply hedge accounting in accordance with IAS 39 as a policy choice. Accordingly, the Bank continues to apply hedge accounting in accordance with IAS 39 in this context.

3.9 Explanations on financial assets

The Bank recognizes and classifies its financial assets as "Financial Assets Measured at Fair Value Through Profit/Loss", "Financial Assets Measured at Fair Value Through Other Comprehensive Income" or "Financial Assets Measured at Amortized Cost".

At initial recognition, financial assets are measured at fair value. If financial assets are not measured at fair value through profit or loss, transaction costs are added to or deducted from their fair value. During the initial recognition of a financial asset into the financial statements, business model determined by the Bank management and the nature of contractual cash flows of the financial asset are taken into consideration.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

3 SIGNIFICANT ACCOUNTING POLICIES (continued)

Classification and measurement of financial instruments

The classification of financial instruments at the time of initial recognition depends on the characteristics of the relevant business model and contractual cash flows used for management.

In accordance with IFRS 9, if a financial asset is held under a business model with the purpose of collecting contractual cash flows or is held under a business model with the purpose of collecting contractual cash flows and intending to sell financial assets, this financial asset is classified based on the characteristics of the contractual cash flows.

During the transition period to Financial Instruments: IFRS 9, the Bank conducted the test of whether "Contractual Cash Flows are Comprised Only of Interest and Principal" on all of its financial assets and has evaluated the asset classifications under the framework of its business model.

Business model Evaluation

In accordance with IFRS 9, the business model is determined at a level that demonstrates how the financial asset groups are managed together to achieve a specific management objective.

Measurement categories of financial assets and liabilities

As of the effective date of IFRS 9 standard; 1 January 2018, the Bank started to classify its' financial assets based on the business model it uses to manage these assets. Three main categories to classify financial assets are:

- Financial assets at fair value through profit or loss
- Financial assets at fair value through other comprehensive income
- Financial assets measured at amortized cost

Financial assets measured at fair value through profit/loss

Financial assets measured at fair value through profit or loss are financial assets that are managed with the business model other than the business model that aims to collect and sell the contractual cash flows and the contractual terms of the financial assets, do not result in cash flows that include interest payments arising only from the principal and principal balance at specific dates; are financial assets that are acquired in order to generate profits from fluctuations in prices and similar factors in the short term in the market or are part of a portfolio aimed at achieving profit in the short term regardless of the reason for the acquisition.

Financial assets measured at fair value through profit or loss are initially recognized at cost in the financial statements. All regular way purchases and sales of financial assets are recognized and derecognized at the settlement date.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

3 SIGNIFICANT ACCOUNTING POLICIES (continued)

The government bonds and treasury bills included in financial assets measured at fair value through profit/loss which are traded on Borsa Istanbul ("BIST") are valued with their weighted average prices settled on BIST as of the reporting date, and government bonds and treasury bills traded on BIST but are not subject to trading on BIST as of the reporting date are valued with their weighted average prices at the latest trading date.

The financial assets classified under this group and whose fair values cannot be measured reliably are carried at amortized cost using the "effective yield method". The difference between the purchase cost and the amortized cost at the selling date is recorded as interest income.

If the selling price of a financial asset measured at fair value through profit/loss is above its amortized cost as of the sale date, the positive difference between the selling price and the amortized cost is recognized as income under trading gains on securities and if the selling price of a trading security is lower than its amortized cost as of the sale date, the negative difference between the selling price and the amortized cost is recognized as expense under trading expense in the statement of profit or loss.

Financial assets at fair value through other comprehensive income

In accordance with IFRS 9, if all of the following conditions are met, the related financial assets are measured at fair value through other comprehensive income.

- Management of financial assets through a business model aimed at collecting and selling their contractual cash flows and
- The contractual terms of the financial asset leading to cash flows that include solely interest payments caused by the principal and principal balance on certain dates.

Financial assets measured at fair value through other comprehensive income are valued at their fair values in the periods subsequent to their acquisition. If the price formations which are a basis for fair values are not realized in active market conditions, it is accepted that the fair value cannot be determined reliably and financial assets at fair value through other comprehensive income are valued with their amortized costs using the effective interest rate method, and are accounted by means of allocating provisions for impairment and discounting.

Difference between the fair value of financial assets at fair value through other comprehensive income and their amortized costs, in other words unrealized profits and losses, is not shown on the statement of profit or loss of the period until the value of the financial asset is collected, sold, disposed of or impaired and it is followed under the account "other comprehensive income and expenses to be reclassified to profit or loss" in equity. When the values of these marketable securities are collected or when they are disposed of, the accumulated fair value differences reflected in the shareholder's equity before are transferred to the profit or loss statement.

Along with this the Bank, at initial recognition on financial statements, may irrevocably choose the method of reflecting changes in fair value to other comprehensive income for specific investments on equity instruments that would normally be measured at fair value through profit or loss.

Marketable securities classified as financial assets at fair value through other comprehensive income which represent share in capital are accounted with their fair values. As an exception, the cost may be an appropriate estimation method for the determination of fair value. This is only possible when there is not enough recent information on the measurement of fair value or when the fair value can be measured by more than one method and it is certain that among these methods the cost represents the fair value estimation in the best way.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

3 SIGNIFICANT ACCOUNTING POLICIES (continued)

Securities classified as irrevocable under other comprehensive income and financial assets of fair value are as follows:

- Garanti Faktoring A.Ş.
- Kredi Garanti Fonu A.Ş.
- Borsa İstanbul A.Ş.
- JCR Avrasya Derecelendirme A.Ş.

Financial assets measured at amortized cost

The Bank may keep its financial assets at amortized cost as long as the following conditions are met.

- Retention of the financial asset in the context of a business model aimed at collecting contractual cash flows
- The contractual terms of the financial asset lead to cash flows that include interest payments on principal and principal balances on certain dates.

Financial assets measured at amortized cost are initially recorded at acquisition cost values with the addition of transaction costs and are measured at amortized cost using effective interest rate method after being recorded.

Interest income obtained from financial assets measured at amortized cost is accounted in statement of profit or loss.

Loans are financial assets that have fixed or determinable payments and are not quoted in an active market. These loans are initially recognized at cost of acquisition with the addition of transaction costs and are measured at amortized cost using "the effective interest rate (internal rate of return) method" after their recognition.

The Bank has been tested "whether contractual cash flows consist of only interest and principal or not" in its the all loan portfolio and after all portfolio has passed the test, the Bank has started to measure all the loans at amortized cost.

Explanations on impairment of financial assets

The Bank recognizes provisions for impairment in accordance with IFRS 9 requirements. Equity instruments are not subject to impairment assessment.

At each reporting date, it shall be assessed whether the credit risk on a financial instrument has increased significantly since initial recognition. When making the assessment, the change in the risk of a default occurring for the financial instrument is used.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

3 SIGNIFICANT ACCOUNTING POLICIES (continued)

Explanations on expected credit losses

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.

Probability of default (PD): It expresses the probability of default of credit in a certain period of time. The PD and LGD parameters used in the calculation of the expected credit loss are calculated as including both current and expected loop changes as instant PD (point in time, PIT). The Bank uses two different default probability values to calculate expected credit losses in accordance with IFRS 9.

- 12-month default probability: Estimation of default probability within 12 months after the reporting date,
- Lifetime default probability: Estimation of default probability over the expected life of the financial instrument.

Lost Given Default (LGD): If the borrower is in default, it refers to the economic loss caused by the loan. The ratio is expressed as.

Exposure at Default (EAD): Represents the outstanding balance of cash loans as of the date of the report. In non-cash loans and commitments, it is the value calculated by applying the credit conversion rate.

Financial assets are divided into the following three categories based on the increase in the credit risks observed since the initial acquisition of financial assets:

12-month expected credit losses (Stage 1): For the financial assets at initial recognition or that do not have a significant increase in credit risk since initial recognition this instruments are impaired at an amount equal to 12-month expected credit losses (resulting from the risk of default within the next 12 months).

Lifetime expected credit losses for non-impaired assets (Stage 2): Includes financial assets which have a significant increase in credit risk since initial recognition, but an unbiased evidence does not occur. Lifetime expected credit losses are recognized for these financial instruments.

Lifetime expected credit losses for credit-impaired financial assets (Stage 3): Includes financial assets that have objective evidence of impairment at the reporting date. For these assets, lifetime expected credit losses are recognized and interest revenue is calculated on the net carrying amount.

This general model is applied to all instruments within the scope of IFRS 9 impairment.

Measurement of expected credit losses

In practice, for exposures classified in Stage 1 and Stage 2, expected credit losses are measured as the product of the probability of default ("PD"), loss given default ("LGD") and exposure at default ("EAD"), discounted at the effective interest rate of the exposure. They result from the risk of default within the next 12 months (stage 1), or from the risk of default over the maturity of the credit facility (stage 2).

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

3 SIGNIFICANT ACCOUNTING POLICIES (continued)

For exposures classified in stage 3, expected credit losses are measured as the value, discounted at the effective interest rate, of all cash shortfalls over the life of the financial instrument. Cash shortfalls represent the difference between the cash flows that are due in accordance with the contract, and the cash flows that are expected to be received.

Maturity

All contractual terms of the financial instrument (including prepayment, extension and similar options) over the life of the instrument are taken into account.

Probability of Default (PD)

The Probability of Default is an estimate of the likelihood of default over a given time horizon. The measurement of expected credit losses requires the estimation of both 1 year probabilities of default and lifetime probabilities of default.

Loss Given Default (LGD)

The Loss Given Default is the difference between the contractual cash-flows and the expected cash-flows. The LGD is expressed as a percentage of the EAD.

Exposure at Default (EAD)

The Exposure at Default of an instrument is the anticipated outstanding amount owed by the obligor at the time of default.

Forward looking

The amount of expected credit losses is measured on the basis of probability-weighted scenarios, in view of past events, current conditions and reasonable and supportable economic forecasts.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

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3 SIGNIFICANT ACCOUNTING POLICIES (continued)

Significant increase in credit risk

In the event of a significant increase in credit risk, the financial asset is transferred to Stage 2.

Qualitative considerations taken into determining the significant increase in the credit risk of a financial asset as follows:

- Delay days as of the reporting date is 30 or more,
- Refinancing and restructuring the loan account,
- Loans under close monitoring.

Definition of default

The Bank considers a financial asset to be in default when:

- the borrower is unlikely to pay its credit obligations to the Bank in full;
- the borrower is more than 90 days past due on any material loan obligation to the Bank.

Overdrafts are considered as being past due once the customer has breached an advised limit or has been advised of a limit sm aller than the current amount outstanding; or

- it is becoming probable that the borrower will restructure the asset as a result of bankruptcy due to the borrower's inability to pay its credit obligations.

In assessing whether a borrower is in default, the Bank considers indicators that are:

- qualitative: e.g. breaches of covenant;
- quantitative: e.g. overdue status and non-payment on another obligation of the same issuer to the Bank; and
- based on data developed internally and obtained from external sources.

Inputs into the assessment of whether a financial instrument is in default and their significance may vary over time to reflect changes in circumstances.

As of 31 December 2021, the breakdowns of individually and collectively assessed expected credit losses for loans, financial lease receivables and non-cash loans are as follows:

	Stag	e 1	Stage	2	Stage 3	
	Individiual	Collective	Individiual	Collective	Individiual	Collective
Cash Loans	13,324	283,551,740	-	3,008,715	29	559,727
Financial Lease Rec.	-	-	-	-	-	-
Non-Cash Loans	-	26,067,008	-	-	-	-
Total	13,324	309,618,748	-	3,008,715	29	559,727

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

3 SIGNIFICANT ACCOUNTING POLICIES (continued)

3.10 Explanations on the write-off policy

Where sound indicators exist that would suggest that the collection of the Bank's foreign compensation receivables is almost impossible or that the costs to be incurred for the collection of the receivable amount would be higher than the amount of the receivable, the receivable amount is written-off from the assets upon the decision of the Executive Committee The Bank has derecognized non-performing loans amounting to TL 22,587 in the current period. Write-off of the non-performing loans and receivables is not considered, during the legal follow-up process concerning the collection of receivables.

3.11 Cash and cash equivalents

Cash and cash equivalents include notes and coins on hand, unrestricted balances held with central banks and highly liquid financial assets with original maturities of less than three months, which are subject to insignificant risk of changes in their fair value and are used by the Bank in the management of its short-term commitments.

Cash and cash equivalents are carried at amortized cost in the statement of financial position.

3.12 Property and equipment

Recognition and measurement

Items of property and equipment are measured at cost less accumulated depreciation and impairment losses.

Cost includes expenditures that are directly attributable to the acquisition of the asset. The cost of self-constructed assets includes the cost of materials and direct labor, any other costs directly attributable to bringing the asset to a working condition for its intended use, and the costs of dismantling and removing the items and restoring the site on which they are located.

Subsequent costs

The cost of replacing part of an item of property or equipment is recognized in the carrying amount of the item if it is probable that the future economic benefits embodied within the part will flow to the Bank and its cost can be measured reliably. The costs of the day-to-day servicing of property and equipment are recognized in profit or loss as incurred.

Depreciation

Depreciation is recognized in profit or loss on a straight-line basis over the estimated useful lives of each part of an item of property and equipment. Leased assets are depreciated over the shorter of the lease term and their useful lives. Land is not depreciated. The estimated useful lives are assigned accordance with the existing statutory tax law.

The estimated useful life for the current and comparative periods is as follows:

	Years
Buildings	50 years
Vehicles	5 years
Other tangible assets	1 - 50 years
Right of use assets	4-10 years

Leasehold improvements are depreciated on a straight-line method over a period of time of their lease contract.

Depreciation methods, useful lives and residual values are reviewed at each financial period end and adjusted if appropriate.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

3 SIGNIFICANT ACCOUNTING POLICIES (continued)

3.13 Intangible assets

Software acquired by the Bank is stated at cost less accumulated amortization and accumulated impairment losses.

Subsequent expenditure on software assets is capitalized only when it increases the future economic benefits embodied in the specific asset to which it relates. All other expenditure is expensed as incurred.

Amortization is recognized in profit or loss on a straight-line basis over the estimated useful life of the software, from the date that it is available for use. The estimate useful lives of software are three to five years.

3.14 Investment property

Investment properties in accordance with IAS 40 consist of properties held for obtaining lease income and/or held for recognizing fair value increase. Investment properties are accounted with the cost amount after deduction of accumulated depreciation and permanent impairment losses. Investment properties are depreciated in accordance with the useful life principles with straight-line depreciation method. Gains or losses arising from the disposal or out of usage of the investment property, shall be determined as the difference between the net income from the sale and the carrying amount of the asset and shall be recognized in profit or loss in the period of disposal or out of usage.

3.15 Assets held for sale

An asset (or a disposal group) classified as asset held for sale in accordance with IFRS 5 is measured at lower of carrying value or fair value less costs to sell. An asset (or a disposal group) is regarded as asset held for sale only when the sale is highly probable and the asset (disposal group) is available for immediate sale in its present condition. For a highly probable sale, there must be a valid plan prepared by the management for the sale of asset including identification of possible buyers and completion of sale process. Furthermore, the asset should be actively marketed at a price consistent with its fair value.

3.16 Impairment of non-financial assets

The Bank's non-financial assets, other than deferred tax assets, are reviewed at each reporting date to determine whether there is any indication of impairment. If any such indication exists for an asset or a group of assets, then the related asset's recoverable amount is estimated.

An impairment loss is recognized if the carrying amount of an asset or its cash-generating unit exceeds its recoverable amount. A cash-generating unit is the smallest identifiable asset group that generates cash flows that largely are independent from other assets and groups. Impairment losses are recognized in profit or loss. Impairment losses recognized in respect of cash-generating units are allocated first to reduce the carrying amount of any goodwill allocated to the units and then to reduce the carrying amount of the other assets in the unit (group of units) on a pro rata basis.

The recoverable amount of an asset or cash-generating unit is the greater of its value in use and its fair value less costs to sell. In assessing value in use, the estimated future cash flows are discounted to their present value using a pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset.

An impairment loss in respect of other assets, impairment losses recognized in prior periods is assessed at each reporting date for any indications that the loss has decreased or no longer exists. An impairment loss is reversed if there has been a change in the estimates used to determine the recoverable amount. An impairment loss is reversed only to the extent that the asset's carrying amount does not exceed the carrying amount that would have been determined, net of depreciation or amortization, if no impairment loss had been recognized.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

3 SIGNIFICANT ACCOUNTING POLICIES (continued)

3.17 Funds borrowed and subordinated liabilities

Funds borrowed and subordinated liabilities are initially measured at fair value minus incremental direct transaction costs, and subsequently measured at their amortized cost using the effective interest method.

3.18 Debt securities

Debt securities issued are evaluated at "amortized cost" using the "effective interest method", when the liabilities are not carried at fair value through profit/loss. The Bank has no debt securities issued at fair value through profit/loss.

3.19 Provision

A provision is recognized if, as a result of a past event, the Bank has a present legal or constructive obligation that can be estimated reliably, and it is probable that an outflow of economic benefits will be required to settle the obligation. 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.

A provision for restructuring is recognized when the Bank has approved a detailed and formal restructuring plan, and the restructuring either has commenced or has been announced publicly. Future operating costs are not provided for.

A provision for onerous contracts is recognized when the expected benefits to be derived by the Bank from a contract are lower than the unavoidable cost of meeting its obligations under the contract. The provision is measured at the present value of the lower of the expected cost of terminating the contract and the expected net cost of continuing with the contract. Before a provision is established, the Bank recognizes any impairment loss on the assets associated with that contract.

3.20 Employee benefits

Reserve for employee severance indemnity

Reserve for employee severance indemnity represents the present value of the estimated future probable obligation of the Bank arising from the retirement of the employees and calculated in accordance with the Turkish Labor Law. Employment termination benefit is not a funded liability and there is no requirement to fund it. Employment termination benefit is calculated based on the estimation of the present value of the employee's probable future liability arising from the retirement. IAS 19 (2011) ("Employee Benefits") requires actuarial valuation methods to be developed to estimate the bank's obligation under defined employee plans. IAS 19 (2011) ("Employee Benefits") has been revised effective from the annual period beginning after 1 January 2013. In accordance with the revised standard, actuarial gain / loss related to employee benefits shall be recognized in other comprehensive income.

Short-term employee benefits

Short-term employee benefit obligations are measured on an undiscounted basis and are expensed as the related service is provided.

A liability is recognized for the amount expected to be paid under short-term cash bonus if the Bank has a present legal or constructive obligation to pay this amount as a result of past service provided by the employee and the obligation can be estimated reliably. The Bank does not have any internally set defined contribution plan.

3.21 Events after the reporting period

Events after the reporting period that provide additional information about the Bank's position at the reporting dates (events that require adjustment) are reflected in the financial statements. Events after the reporting period that do not require adjustments are disclosed in the notes when material.

3.22 Affiliates and subsidiaries

Subsidiaries are accounted for at cost in accordance with IAS 27 "Turkish Accounting Standard for Individual Financial Statements" and are reflected in the financial statements after the impairment, if any.

As of the reporting date, the Bank has no subsidiaries.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

4 FINANCIAL RISK MANAGEMENT

(a) Strategy in using financial instruments

As of 31 December 2021, the loan portfolio of the Bank constitutes 89% (31 December 2020: 87%) of total assets. In short, medium and long term lending (except for funded loans and country loans), the Bank is taking the risk of the Turkish banking system, however medium-to-long term country loans are under the political risk guarantee of the Turkish Treasury.

The Board of Directors of the Bank sets risk limits for the transactions having significant implications for the operations of the Bank.

The main objective of the Bank's asset and liability management is to limit the Bank's exposure to liquidity risk, interest rate risk, foreign currency risk and credit risk to certain boundaries and to strengthen the Bank's equity.

(b) Credit risk

According to article numbered 25 of the decree (regulating the "Articles of Association" of the Bank) of the Council of Ministers dated 17 June 1987; the scope of the annual operations of the Bank is determined by the Bank's Annual Program that is approved by Supreme Advisory and Credit Guidance Committee ("SCLGC"). The Board of Directors of the Bank is authorized to allocate the risk limits of loan, guarantee and insurance premium to country, sector and commodity Banks, within the principles set by the Annual Program.

In accordance with the collateralization policy, most of the risks of short-term loans are taken from domestic banks. The cash and non-cash limits of domestic banks for short-term, medium and long-term loans are approved by the Board of Directors.

The Board of Directors of the Bank fulfilled authorizations for the determination of loan limits for a person or legal entity, limited with only the loans which were given with respect to specified guaranties, within the framework of the 5th item in the Regulation related with Loan Transactions.

The risk limits of the foreign country loans are determined by annual programs which are approved by SCLGC within the foreign economic policy.

Country loans are granted with the approval of the Board of Directors and the approval of the Minister and the Council of Ministers; according to article 10 of Act number 4749 dated 28 March 2002 related to the regulation of Public Finance and Debt Management.

The fundamental collateral of the foreign country loans are the government guarantee of the counter country and the guarantee of banks that the Bank accepts as accredited.

The limit of a country is restricted by both "maximum limit that can be undertaken" and "maximum amount that can be used annually".

Each year major portion of the commercial and politic risks emerged in Short Term Export Insurance Program is transferred to international reinsurance companies under renewed agreements.

According to the Article 4/C of Act number 3332 that was appended by Act number 3659 and Act regarding the regulation of Public Financing and Debt Management dated 28 March 2002, the losses incurred by the Bank in its credit, guarantee and insurance transactions as a result of political risks are covered by the Turkish Treasury.

The Bank reviews regularly the reports of OECD country risk groups, reports of the members of the International Union of Credit and Investment Insurers, reports of independent credit rating institutions and the financial statements of the banks of which risks are undertaken. In addition, country reports and short term country risk classifications prepared within the Bank are also utilized.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

4 FINANCIAL RISK MANAGEMENT (continued)

The risks and limits of companies and banks are followed by both loan and risk departments on a weekly and monthly basis.

In addition, all the foreign exchange denominated operations and other derivative transactions of the Bank are carried out under the limits approved by the Board of Directors.

Business and geographic distribution of the loan risks runs parallel with the export composition of Turkey and is followed up by the Bank regularly.

Impairment and provisioning policies

The Bank reviews its loan portfolios to assess impairment on a quarterly basis. In determining whether an impairment loss should be recorded in profit or loss, the Bank makes judgments as to whether there is any observable data indicating that there is a measurable decrease in the estimated future cash flows from a portfolio of loans before the decrease can be identified with an individual loan in that portfolio. This evidence comprises observable data indicating that there has been an adverse change in the payment status of borrowers in a group, or national or local economic conditions that correlate with defaults on assets in the group. The Bank uses estimates based on historical loss experience for assets with credit risk characteristics and objective evidence of impairment similar to those in the portfolio when scheduling its future cash flows. The methodology and assumptions used for estimating both the amount and timing of future cash flows are reviewed regularly to reduce any differences between loss estimates and actual loss experience.

The Bank allocates provisions for loans and advances that have specific properties. The classification of the loan portfolio of the Bank is formed under the following categories:

	31 December 2021		31 Decemb	ber 2020
	Corporate	Personnel	Corporate	Personnel
	loans	loans	loans	loans
Neither past due per impaired	285,830,764	13,324	176 059 622	12 224
Neither past due nor impaired	, ,	15,324	176,958,632	13,324
Past due but not impaired	729,691	-	406,644	-
Past due and individually impaired	559,727	29	1,031,825	90
Total loans and advances	287,120,182	13,353	178,397,101	13,414
F . 1 P.1 G. 1	(0.4.201)		(05.150)	(5.0)
Expected credit losses- Stage 1	(84,201)	-	(85,178)	(56)
Expected credit losses- Stage 2	(6,014)	-	(3,990)	-
Expected credit losses- Stage 3	(559,756)	-	(690,280)	(90)
Net loans and advances	286,470,211	13,353	177,617,653	13,268

As of 31 December 2021, and 31 December 2020, the delinquency details of loans and advances that are past due but not impaired are as follows:

	31 December 2021	31 December 2020
Past due up to 30 days	184,227	50,751
Past due 31-60 days	366,135	205,077
Past due 61-90 days	179,329	150,816
Total loans and advances that are past due		
but not impaired	729,691	406,644

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

4 FINANCIAL RISK MANAGEMENT (continued)

Effect of collateral on credit-impaired (stage 3) loans are as follows;

Collateral Type	Credit Risk	Collateral Amount		
Letter of Credit	158,688	850,513		
Unsecured	317,640	-		
Guarantee Bond	48,420	1,066,486		
Mortgage of Ship	33,141	466,517		
Cash	-	-		
Real Estate Mortgage	1,867	4,200		
Commercial Enterprice Pledge	-	-		
Total	559,756	2,387,716		

As of 31 December 2021 and 31 December 2020 the fair value of collaterals held for total loans and advances are as follows:

	31 Decem	ber 2021	31 December 2020		
	Corporate loans	Personnel loans	Corporate loans	Personnel loans	
	104115	Italis	104115	Ivans	
Collaterals guaranteed by other banks	267,408,123	-	164,562,560	_	
Collaterals guaranteed by a third party	-	13,353	-	13,414	
Total	267,408,123	13,353	164,562,560	13,414	
Unsecured exposures (1)	19,712,059	-	13,834,541	-	
Total loans and advances	287,120,182	13,353	178,397,101	13,414	

Unsecured exposures represent loans and advances granted to domestic banks, foreign banks and other financial institutions and individually impaired loans.

As of 31 December 2021, the Bank does not have repossessed collateral (31 December 2020: None).

Credit quality per class of loans and advances as at 31 December 2021 is as follows;

	Carrying Amount			ECL Allowance				
	Stage 1	Stage 2	Stage 3	Total	Stage 1	Stage 2	Stage 3	Total
Cash and due from								
banks	19,481,123	-	-	19,481,123	313	-	-	313
Securities	11,525,724	-	-	11,525,724	1,463	-	-	1,463
Loans and Advances								
to Customers	283,565,064	3,008,715	559,756	287,133,535	84,201	6,014	559,756	649,971
Other Assets	335,444		-	335,444	619	101,614	-	102,233

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

4 FINANCIAL RISK MANAGEMENT (continued)

Bank's credit rating policy

The risk assessment of banks and other financial institutions

The Bank requests independent auditor's report in addition to financial statements and related notes and net foreign currency position from banks and other financial institutions on a quarterly basis.

Financial statement information derived from the independent audit or review reports of banks and other financial institutions is recorded into a database in a standard format and percentage changes and ratios related with the capital adequacy, asset quality, liquidity and profitability of the banks and other financial institutions are calculated. In addition, the standard ratios for capital adequacy, asset quality, liquidity and profitability ratios are redefined periodically considering the operations of the banks and acceptable intervals for standard ratios are defined.

In accordance with the standard ratios, the risk ratings of banks are defined by assigning grades from 1 to 4 to banks and other financial institutions. Banks with grade 1 consist of the lowest risk profile of banks and financial institutions and banks with grade 4 consist of the highest risk profile of banks and financial institutions.

In accordance with the risk concentration of the banks and other financial institutions, the final risk is determined by considering qualitative factors such as shareholding structure, group companies, credit ratings from international credit rating institutions, quality of management and also information obtained from media.

As of 31 December 2021, loans granted by the Bank to banks and other financial institutions amount to TL 28,933,811 (31 December 2020: TL 17,778,906). As of 31 December 2021 and 31 December 2020, the concentration level of the loans and advances to banks and other financial institutions which are neither past due nor impaired in accordance with the defined financial analysis of the Bank is as follows:

		31 December 2021	31 December 2020
	Rating class	Concentration level (%)	Concentration level (%)
Low	1-6	87	85
Medium	6-8	12	14
High	8-10	1	1

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

4 FINANCIAL RISK MANAGEMENT (continued)

The risk assessment of the companies:

In the risk evaluation of companies, the Bank obtains financial and organizational information both from the companies and also from various sources (such as Central Bank of the Republic of Turkey ("CBRT") records, Trade Registry Gazette, Chamber of Trade records, information obtained from the Undersecretariat of Foreign Trade, banks and companies operating in the same sector etc.) and uses investigation and verification methods. In addition to the analysis of the last three year financial statements of the companies, the Bank also analyzes the current status of the sectors in which the companies operate, economic and political changes affecting the target sectors in the international markets, the advantages and disadvantages of the companies compared to their rival companies operating in or outside Turkey. If the company is a member of a group of companies not organized as a holding company, the developments that can affect the company's operations are monitored and outstanding bank debts of the company are also reviewed, and company analysis reports are prepared taking into account the group risk as well. The Bank does not use a separate rating system regarding the risk assessment of the companies.

As of 31 December 2021 and 31 December 2020, when we analyze the loan limits for top 60 corporate customers, we observe that these loans constitute approximately 53%, respectively of total loans to corporate customers amounting to TL 150,693,449 (31 December 2020: TL 78,988,904). The details of these loans are as follows;

	31 December 2021	31 December 2020
	Concentration	Concentration
Credit limits (TL)	level (%)	level (%)
0 - 20,000	-	-
20,000 - 40,000	-	-
40,000 - 60,000	-	-
Over 60,000	100,00	100,00
Total	100,00	100,00

The Bank's maximum exposure to credit risk as of 31 December 2021 and 31 December 2020:

	31 December 2021	31 December 2020
Credit risk exposures relating to on-balance sheet assets:		
Due from banks	19,480,810	11,681,430
Loans and advances to		
- Domestic banks and other financial institutions	19,152,303	12,980,432
- Foreign banks and other financial institutions	9,781,508	6,209,649
- Corporate customers other than banks and financial institutions		
and personnel	257,549,753	158,440,840
Derivative financial assets	40,982	26,224
Derivative assets held for risk management	1,498,107	466,113
Investment securities		
- Financial assets at fair value through profit or loss	178,275	153,454
- Financial assets at fair value through other comprehensive income	1,266,557	709,777
- Financial assets measured at amortized cost	9,955,982	10,637,542
Credit risk exposures relating to off-balance sheet items:		
Financial guarantees	25,275,933	11,990,878
Total	344,180,210	213,296,339

A of 31 December 2021 and 31 December 2020, financial assets measured at amortized cost are issued by the Turkish Treasury, the controlling shareholder of the Bank.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

4 FINANCIAL RISK MANAGEMENT (continued)

As of 31 December 2021 and 31 December 2020, the geographical distribution of the on-balance sheet assets exposed to credit risk:

		EU	OECD		Other	
	Turkey	countries	countries ⁽¹⁾	USA	Countries	Total
Cash and due from banks	16,856,670	163,245	761	2,460,134		19,480,810
Loans and advances to	10,650,070	103,243	701	2,400,134	-	19,400,010
- Domestic banks and other financial						
institutions	19,152,303					19,152,303
- Foreign banks and other financial	19,132,303	-	-	-	-	19,132,303
institutions					0.791.509	9,781,508
	257 540 752	-	-	-	9,781,508	, ,
- Corporate customers and personnel	257,549,753	40.000	-	-	-	257,549,753
Derivative assets held for trading	-	40,982	-	-	-	40,982
Derivative assets held for risk management	-	1,498,107	-	-	-	1,498,107
Investment securities						
- Financial assets measured at fair value						
through profit or loss	178,275	-	-	-	-	178,275
- Financial assets measured at fair value						
through other comprehensive income	1,266,557	-	-	-	_	1,266,557
Financial assets measured at amortized cost	9,955,982	-	-	-	-	9,955,982
As of 31 December 2021	304,959,540	1,702,334	761	2,460,134	9,781,508	318,904,277

⁽¹⁾ The OECD countries except for EU countries, Canada and USA.

		EU	OECD		Other	
	Turkey	countries	countries ⁽¹⁾	USA	Countries	Total
	11 20 6 700	46.020		220.027		11 (01 120
Cash and due from banks	11,396,708	46,029	666	238,027	-	11,681,430
Loans and advances to						
 Domestic banks and other financial 						
institutions	12,980,432	-	-	-	-	12,980,432
 Foreign banks and other financial 						
institutions	-	-	-	-	6,209,649	6,209,649
- Corporate customers and personnel	158,440,840	_	_	_	_	158,440,840
Derivative assets held for trading	25,833	102	-	289	-	26,224
Derivative assets held for risk management	_	466,113	_	_	_	466,113
Investment securities		•				ŕ
Financial assets measured at fair value						
through profit or loss	153,454	_	_	_	_	153,454
Financial assets measured at fair value	, -					, -
through other comprehensive income	709,777	_	_	_	_	709,777
Financial assets measured at amortized cost	10,637,542	_	_	_	_	10,637,542
i manetar assets incasured at amortized cost	10,037,342	_	_	_	_	10,037,342
As of 31 December 2020	194,344,586	512,244	666	238,316	6,209,649	201,305,461

⁽¹⁾ The OECD countries except for EU countries, Canada and USA.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

4 FINANCIAL RISK MANAGEMENT (continued)

(c) Market risk

Market risk refers to the possibility of loss that may arise due to interest, exchange rate and price changes arising from fluctuations in the financial markets in the positions of the Bank on its balance sheet and off-balance sheet accounts and consequent changes in the Bank's income/expense item and equity profitability. In order to hedge against the market risk that the Bank may be exposed to as a result of financial activities, all Turkish Lira (TL) and foreign currency securities portfolio for trading purposes are evaluated daily with the current rates in the market. In order to limit the possible loss that may arise from market risk, the maximum amount of transactions that can be carried per day, including securities transactions, the maximum amount of transactions and the limit for termination of damages are applied within the limits set by the Board of Directors for all trading transactions. "Exchange Rate" and "Interest Rate" are calculated based on the "Standard Method and Market Risk Measurement Method" published by the BRSA in the calculation of the market risk exposed to the Bank in the Capital Adequacy Analysis Form.

Derivative transactions are initially measured at fair value and transaction costs that are attributable to them are recognized in profit or loss as they are incurred. They are valued with their fair values in subsequent periods. This valuation result is reflected in the financial statements as a single asset or liability on a contract basis by netting off the receivables and payables arising from each contract within their fair values. The method of accounting for the resulting profit or loss varies depending on whether the derivative is intended for hedging or not and the content of the hedged asset.

		Risk Weighted Amounts
	Outright Products	
1	Interest rate risk (general and specific)	222,575
2	Stock risk (general and specific)	-
3	Foreign exchange risk	112,275
4	Commodity risk	-
	Options	
5	Simplified approach	-
6	Delta-plus method	-
7	Scenario approach	-
8	Securitizations	-
9	Total	334,850

(d) Currency risk

Foreign currency denominated assets and liabilities, together with purchase and sale commitments give rise to foreign exchange exposure.

The Bank's foreign exchange position is followed daily, and the transactions are performed in accordance with the expectations in the market and within the limits determined by the Risk Management Principles approved by the Board of Directors of the Bank.

The Bank attempts to maintain a square position in foreign exchange through its on-balance sheet and off-balance sheet activities. As part of its strategy to manage the impact of exchange rates and to hedge against foreign exchange exposure, the Bank enters into swap transactions. Short-term currency swap transactions carried out during the year to meet exporters' foreign exchange loan demand and to manage the Bank's foreign currency risk.

The Bank is exposed to foreign currency risk due to the effects of fluctuations in the prevailing foreign currency exchange rates on its financial position and cash flows. Included in the table are the Bank's assets, liabilities and paid-in capital at carrying amounts, categorized by currency.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

4 FINANCIAL RISK MANAGEMENT (continued)

The table below summarizes the Bank's exposure to foreign currency exchange rate risk as at 31 December 2021 and 31 December 2020.

		31 Decemb	er 2021	
	USD	EUR	Other	Total
Cash and due from banks	4,965,635	8,901,963	59,379	13,926,977
Financial assets measured at fair value through				
profit or loss	178,275	-	-	178,275
Derivative financial instruments	40,972	-	10	40,982
Derivative assets held for risk management	1,498,107	-	-	1,498,107
Loans and advances	112,741,223	159,972,522	1,004,958	273,718,703
Investment securities				
- Financial assets measured at fair value through				
other comprehensive income	1,266,557	-	-	1,266,557
- Financial assets measured at amortized cost	4,408,949	2,556,933	-	6,965,882
Property and equipment and intangible assets	-	-	-	-
Investment property	-	-	-	-
Other assets	162,397	585,473	2,250	750,120
Total assets	125,262,115	172,016,891	1,066,597	298,345,603
Funds borrowed	111,572,976	134,131,350	980,879	246,685,205
Subordinated loans	-	2,524,710	-	2,524,710
Debt securities in issue	37,284,304	-	-	37,284,304
Interbank money market deposits	2,290,256	4227425	-	6,517,681
Derivative financial instruments	638	-	-	638
Derivative liabilities held for risk management	116,339	-	-	116,339
Other liabilities	3,350,290	1,756,276	31,910	5,138,476
Reserve for employment termination benefits	-	-	_	_
Equity	-	-	-	-
Total liabilities and equity	154,614,803	142,639,761	1,012,789	298,267,353
Net balance sheet position	(29,352,688)	29,377,130	53,808	78,250
Off balance sheet derivative instruments net			·	
notional position	29,865,903	(29,270,358)	(63,642)	531,903

At 31 December 2021, assets and liabilities denominated in foreign currency were translated into Turkish lira using foreign exchange rate of TL 13.1865= US Dollar 1 ("USD") and TL 14.9047 = EUR 1.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

4 FINANCIAL RISK MANAGEMENT (continued)

	31 December 2020					
	USD	EUR	Other	Total		
Cash and due from banks	239,003	8,457,638	21,943	8,718,584		
Financial assets measured at fair value through						
profit or loss	153,454	-	-	153,454		
Derivative financial assets	96	-	-	96		
Derivative assets held for risk management	466,113	-	_	466,113		
Loans and advances	59,722,219	102,007,777	329,819	162,059,815		
Investment securities						
- Financial assets measured at fair value						
through other comprehensive income	709,777	-	-	709,777		
- Financial assets measured at amortized cost	2,536,597	5,111,369	-	7,647,966		
Property and equipment and intangible assets	-	-	-	-		
Investment property	-	-	-	-		
Other assets	178,202	125,835	1,033	305,070		
Total assets	64,005,461	115,702,619	352,795	180,060,875		
Funds borrowed	61,721,570	90,631,379	313,050	152,665,999		
Subordinated liabilities	-	1,465,448	-	1,465,448		
Debt securities in issue	22,690,256	-	-	22,690,256		
Interbank money market deposits	1,375,566	-	-	1,375,566		
Derivative financial liabilities	103,485	-	1	103,486		
Derivative liabilities held for risk management	676,199	_	-	676,199		
Other liabilities	754,548	802,694	7,947	1,565,189		
Reserve for employment termination	-	-	-	-		
Equity	-	-	-	-		
Total liabilities and equity	87,321,624	92,899,521	320,998	180,542,143		
Net balance sheet position	(23,316,163)	22,803,098	31,797	(481,268)		
Off balance sheet derivative instruments net notional position	21,860,401	(22,736,820)	(31,798)	(908,217)		

At 31 December 2020, assets and liabilities denominated in foreign currency were translated into Turkish lira using foreign exchange rate of TL 7.3647 = US Dollar 1 ("USD") and TL 9.0512 = EUR

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

4 FINANCIAL RISK MANAGEMENT (continued)

As of 31 December 2021 and 31 December 2020, the effect of the devaluation of TL by 10% against foreign currencies, under the assumption that all other variables are stable, on net profit/loss and equity of the Bank, are presented below. The other variables, especially interest rates are assumed to be fixed.

	31 Decem	ber 2021	31 December 2020		
	Effect on net profit	Effect on equity	Effect on net profit	Effect on equity (1)	
USD	51,322	51,322	(145,576)	(145,576)	
EUR	10,677	10,677	6,628	6,628	
Other currencies	(983)	(983)	-	-	
Total	61,016	61,016	(138,948)	(138,948)	

⁽¹⁾ Effect on equity also includes effect on net profit.

As of 31 December 2021 and 31 December 2020, the effect of the appreciation of TL by 10% against other currencies with all other variables held constant, on net profit and equity of the Bank is the same as the total amount with a negative sign as presented in the above table.

(e) Interest rate risk

The Bank estimates the effects of the changes in interest rates on the profitability of the Bank by analyzing TL and foreign currency denominated interest rate sensitive assets and liabilities considering both their interest components as being fixed rate or variable rate and also analyzing their weights among the Bank's total assets and liabilities. Long or short positions arising from interest rate risk are determined by currency types at the related maturity intervals (up to 3 months, 3 months to 1 year, 1 year to 5 years and over 5 years) as of the period remaining to repricing date, considering the repricing of TL and foreign currency-denominated interest sensitive assets and liabilities at maturity date (for fixed rate) or at interest payment dates (for floating rate). By classifying interest sensitive assets and liabilities according to their repricing dates, Bank's exposure to possible variations in market interest rates are determined.

The Bank determines maturity mismatches of assets and liabilities by analyzing the weighted average days to maturity of TL and foreign currency-denominated (for each currency and in total in terms of their USD equivalents) assets and liabilities.

According to the Risk Management Policy approved by the Board of Directors, the Bank emphasizes the matching of assets and liabilities with fixed and floating interest rates and under different currencies and also pays special attention to the level of maturity mismatch of assets and liabilities with floating and fixed interest rates in relation to the asset size of the Bank in order to limit the negative effects of interest rate changes on the Bank's profitability.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

4 FINANCIAL RISK MANAGEMENT (continued)

As of 31 December 2021 and 31 December 2020, the table below summarizes the Bank's position exposed to interest rate risk. Carrying amounts of assets and liabilities are classified in terms of periods remaining to contractual repricing dates in the table below;

			31 Decemb	er 2021		
	Up to 3 Months	3 months to 1 year	1 year to 5 years	Over 5 years	Non- interest bearing	Total
Cash and due from banks	5,530,611	9,836	_	_	13,940,363	19,480,810
Financial assets measured at fair value through profit or loss	-	-	178,275	-	-	178,275
Derivative financial instruments	40,982	_	_	_	_	40,982
Derivative assets held for risk management	1,001,365	496,742	-	-	-	1,498,107
Loans and advances	107,732,307	174,138,065	4,053,436	-	559,756	286,483,564
Investment securities - Financial assets measured at fair value through other comprehensive income - Financial assets measured at amortized cost	1,365,009	7,380	767,855 6,559,265	498,701 2,031,708	117,531	1,391,467 9,955,982
Subsidiaries (Net)	-	-	-	-	73,000	73 000
Property and equipment and intangible assets	-	-	-	-	23,271	73,000 23,271
Investment property	-	-	-	-	2,008	2,008
Other assets	_	_	-	-	1,111,190	1,111,190
Total assets	115,670,274	174,652,023	11,558,831	2,530,409	15,827,119	320,238,656
Funds borrowed	74,658,711	169,112,503	4,112,833	1,333,220	-	249,217,267
Subordinated loans	97,368	-	2,524,710	2,901,759	-	5,523,837
Debt securities in issue	-	6,739,447	30,544,857	-	-	37,284,304
Interbank money market deposits	3,855,781	2,661,900	-	-	-	6,517,681
Derivative financial instruments	638	-	-	-	-	638
Derivative liabilities held for risk management	39,672	76,667	-	-	-	116,339
Other liabilities	56,783	282,039	1,562	-	6,653,268	6,993,652
Reserve for employee benefits	-	-	-	-	33,824	33,824
Lease liabilities		5,923	-			5,923
Total liabilities	78,708,953	178,878,479	37,183,962	4,234,979	6,687,092	305,693,465
Net repricing gap	36,961,321	-4,226,456	-25,625,131	-1,704,570	9,140,027	14,545,191

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

FINANCIAL RISK MANAGEMENT (continued)

4

			31 Decem	ber 2020		
	Up to 3	3 months to	1 year to 5	Over 5	Non-interest	
	months	1 year	years	years	bearing	Total
Cash and due from banks	6,581,892	-	-	-	5,099,538	11,681,430
Financial assets measured at fair value through profit or loss			78,554	74,900		153,454
Derivative financial assets	25,960	264	76,554	74,900	-	26,224
Derivative assets held for risk	23,900	204	-	-	-	20,224
management	35,221	156,559	274,333			466,113
Loans and advances	50,866,005	94,403,968	31,870,924	_	490,024	177,630,921
Investment securities	30,800,003	74,403,700	31,670,724	_	470,024	177,030,721
- Financial assets measured at						
fair value through other						
comprehensive income	39,911	40,839	309,081	322,700	92,778	805,309
- Financial assets measured at	0,,,11	.0,000	507,001	222,700	<i>></i> 2 ,0	000,000
amortized cost	909,292	2,791,413	2,762,505	4,174,332	_	10,637,542
Property and equipment and	,	_,,,,,,,	_,, ,_,,	1,2.1.,2.2.		,,,,
intangible assets	_	_	_	_	27,751	27,751
Investment property	-	-	-	-	2,111	2,111
Other assets	217,741	274,596	-	-	1,145,378	1,637,715
Total assets	58,676,022	97,667,639	35,295,397	4,571,932	6,857,580	203,068,570
Funds borrowed	24,303,977	105,073,603	30,718,128	_	_	160,095,708
Subordinated liabilities	6,023	6,023	1,513,632	2,937,898	_	4,463,576
Debt securities in issue	3,990,064	3,625,951	15,337,245	-	-	22,953,260
Interbank money market deposits	0	1,375,566	-	-	-	1,375,566
Derivative financial liabilities	114,682	247	-	-	-	114,929
Derivative liabilities held for risk						
management	307,798	368,401	-	-	-	676,199
Other liabilities	348,215	281,194	1,319,332	-	-	1,948,741
Reserve for employee benefits	-	-	-	-	26,331	26,331
Total liabilities	29,070,759	110,730,985	48,888,337	2,937,898	26,331	191,654,310
Net repricing gap	29,605,263	(13,063,346)	(13,592,940)	1,634,034	6,831,249	11,414,260

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

4 FINANCIAL RISK MANAGEMENT (continued)

The tables below summarize the range for effective average interest rates by major currencies for monetary financial instruments of the Bank at 31 December 2021 and 31 December 2020:

	31 December 2021						
	USD (%)	EUR (%)	JPY (%)	GBP (%)	TL (%)		
Assets							
Cash and due from banks							
- Cash equivalents	-	-	-	-	-		
- Time deposits in foreign banks	0.08	-	-	-	-		
- Time deposits in domestic banks	-	-	_	-	-		
- Interbank money market placements	-	-	_	-	16.88		
Loans and advances	1.90	1.85	_	0.78	14.92		
Investment securities							
- Financial assets measured at fair value							
through profit or loss	7.03	-	_	_	-		
- Financial assets measured at amortized cost	5.66	8.28	_	_	6.73		
- Financial assets measured at fair value							
through other comprehensive income	6.46	-	-	-	-		
<u>Liabilities</u>							
Funds borrowed	0.70	0.27	=	0.11	-		
Subordinated liabilities	-	5.06	_	_	11.21		
Debt securities in issue	5.99	_	_	-	-		
Interbank money market deposits	2.20	-	-	-	-		

	31 December 2020							
	USD (%)	EUR (%)	JPY (%)	GBP (%)	TL (%)			
Assets					_			
Cash and due from banks								
- Cash equivalents	-	-	-	-	-			
- Time deposits in foreign banks	0,10	1,33	-	-	-			
- Time deposits in domestic banks	-	-	-	-	17,77			
- Interbank money market placements	-	-	_	-	17,40			
Loans and advances	2,11	1,17	1,26	1,77	9,11			
Investment securities								
Financial assets measured at fair value								
through profit or loss	6,18	-	-	-	-			
- Financial assets measured at amortized cost	4,91	1,08	-	-	9,81			
- Financial assets measured at fair value								
through other comprehensive income	6,35	-	-	-	-			
<u>Liabilities</u>								
Funds borrowed	1,39	0,42	0,36	0,06	-			
Subordinated liabilities	-	5,06	-	-	12,54			
Debt securities in issue	5,82	-	_	_	9,25			
Interbank money market deposits	2,50	-	-	-	-			

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

4 FINANCIAL RISK MANAGEMENT (continued)

As of 31 December 2021 and 31 December 2020, the effect of a change interest rates, if all other variables are constant, on the net profit is shown below. The sensitivity of the shareholders' equity at 31 December 2021 and 31 December 2020 is calculated by the valuation of the financial assets measured at fair value through other comprehensive income, considering the possible changes in interest rates. The tax effects are not considered in the analysis below. The other variables, especially exchanges rates, are assumed to be fixed in this analysis.

31 December 2021	Currency	Applied shock (+/- x basis points)	Gains /	Gains/shareholders' equity – losses/ shareholders' equity (%)
1	TL	500	(184,871)	(0.91%)
		(400)	140,077	0.69%
2	EURO	200	165,363	0.82%
		(200)	(173,102)	(0.86%)
3	USD	200	584,895	2.89%
		(200)	(637,306)	(3.15%)
	Total (For negative shocks)		(670,331)	(3.32%)
	Total (For positive shocks)		565,387	2.80%

31 December 2020	Currency	Applied shock (+/- x basis points)	Gains / losses	Gains/shareholders' equity – losses/ shareholders' equity (%)
1	TL	500	13,971	0.09
		(400)	(68,928)	(0.43)
2	EURO	200	71,571	0.44
		(200)	(43,591)	(0.27)
3	USD	200	(26,296)	(0.16)
		(200)	38,238	0.24
	Total (For negative shocks)	·	(74,281)	(0.46)
	Total (For positive shocks)		59,246	0.37

(f) Liquidity risk

A major objective of the Bank's asset and liability management is to ensure that sufficient liquidity is available to meet the Bank's commitments and to satisfy the Bank's own liquidity needs. The Bank measures and manages its cash flow commitments on a daily basis, and maintains liquid assets determined by the Board of Directors which it judges sufficient to meet its commitments.

The matching and controlled mismatching of the maturities and interest rates of assets and liabilities is fundamental to the liquidity management of the Bank. The ability to fund unexpected debt requirements is managed by maintaining sufficient cash and marketable securities. It is unusual for banks ever to be completely matched since the maturity, interest rates and the types of business transactions are changing. An unmatched position potentially enhances profitability, but also increases the risk of losses. The maturities of assets and liabilities and the ability to replace, at an acceptable cost, interest-bearing liabilities as they mature, are important factors in assessing the liquidity of the Bank and its exposure to changes in interest rates and exchange rates.

The Bank uses the TL and foreign currency cash flow schedules prepared weekly, monthly and annually in the decision making process of the liquidity management.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

4 FINANCIAL RISK MANAGEMENT (continued)

In accordance with the "Regulation on Calculation of Bank's Liquidity Coverage Ratio", published in Official Gazette no. 28948, dated 21 March 2014, the weeks in which the highest and the lowest liquidity coverage ratio is calculated over the last three months are presented below:

Current Period								
TL+FC TL+FC FC FC							FC	
Week Info	(Max)	Week Info	(Min)	Week Info	(Max)	Week Info	(Min)	
28 November	540,75	31 October 2021	266,54	28 November	449,04	31 October 2021	211,95	
2021				2021				

Prior Period								
TL+FC TL+FC FC FC						FC		
Week Info	(Max)	Week Info	(Min)	Week Info	(Max)	Week Info	(Min)	
27 December 2020	1732,4	1 November 2020	327,7	27 December 2020	1507,69	1 November 2020	250,89	

The Bank's liquidity coverage rates for 31 December 2021 are presented in the table below:

		Total Unweig		Total Weig	hted Value
		(Avera		(Avera	
	rrent Period	TL+FC	FC	TL+FC	FC
HIC	GH QUALITY LIQUID ASSETS				
1	High-quality liquid assets (HQLA)			12,684,172	10,894,332
CA	SH OUTFLOWS	-	-	-	-
	Retail deposits and deposits from small business				
2	customers	-	-	-	-
3	Stable deposits	-	-	-	-
4	Less stable deposits	-	-	-	-
5	Unsecured wholesale funding, of which:	23,218,258	23,191,225	11,391,166	11,373,595
6	Operational deposits	-	-	-	-
7	Non-operational deposits	-	-	-	-
8	Unsecured funding	23,218,258	23,191,225	11,391,166	11,373,595
9	Secured funding				
10	Other cash outflows of which:	948,881	917,775	902,650	872,892
	Outflows related to derivative exposures and other				
11	collateral requirements	871,832	842,973	871,831	842,972
	Outflows related to restructured financial				
12	instruments	-	-	-	-
	Payment commitments and other off-balance sheet				
13	commitments granted for debts to financial markets	77,049	74,802	30,819	29,920
	Other revocable off-balance sheet commitments and				
14	contractual obligations	-	-	-	-
	Other irrevocable or conditionally revocable off-				
15	balance sheet obligations	20,687,099	20,687,099	1,034,355	1,034,355
16	TOTAL CASH OUTFLOWS			13,328,171	13,280,842
CA	SH INFLOWS				
17	Secured receivables	-	-	-	-
18	Unsecured receivables	26,045,142	22,607,629	15,227,192	12,132,414
19	Other cash inflows	10,494	5,406	10,494	5,406
20	TOTAL CASH INFLOWS	26,055,636	22,613,035	15,237,686	12,137,820
				Max limit app	lied values
21	TOTAL HQLA STOCK			12,684,172	10,894,332
22	TOTAL NET CASH OUTFLOWS			3,370,187	3,411,760
23	LIQUIDITY COVERAGE RATIO (%)			376,36	319,32

^(*) The average of last three months' liquidity coverage ratio calculated by weekly simple averages.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

4 FINANCIAL RISK MANAGEMENT (continued)

The Bank's liquidity coverage rates for 31 December 2020 are presented in the table below:

		Total Unweig (Avera		Total Weigh (Avera	
Pri	or Period	TL+FC	FC	TL+FC	FC
HI	GH QUALITY LIQUID ASSETS				
1	Total high-quality liquid assets (HQLA)			14,255,329	11,789,874
CA	SH OUTFLOWS			-	-
	Retail deposits and deposits from small business				
2	customers	-	-	-	-
3	Stable deposits	-	-	-	-
4	Less stable deposits	-	-	-	-
	Unsecured funding other than retail deposits and				
5	deposits from small business customers	15,174,491	15,174,491	7,680,006	7,680,006
6	Operational deposits	-	-	-	-
7	Non-operational deposits	-	-	-	-
8	Unsecured funding	15,174,491	15,174,491	7,680,006	7,680,006
9	Secured funding	<u> </u>			
10	Other cash outflows	1,755,106	1,737,570	1,010,548	1,002,352
	Outflows related to derivative exposures and other				
11	collateral requirements	514,178	512,209	514,177	512,208
12	Outflows related to restructured financial instruments	-	-	-	-
	Payment commitments and other off-balance sheet				
13	commitments granted for debts to financial markets	1,240,928	1,225,361	496,371	490,144
	Other revocable off-balance sheet commitments and				
14		-	-	-	-
	Other irrevocable or conditionally revocable off-				
	balance sheet obligations	10,896,351	10,896,351	544,817	544,817
16	TOTAL CASH OUTFLOWS			9,235,371	9,227,175
	SH INFLOWS				
17	Secured receivables		-	-	
18	Unsecured receivables	18,745,490	15,200,064	11,910,832	8,512,980
19	Other cash inflows	26,197	2,610	26,197	2,609
20	TOTAL CASH INFLOWS	18,771,687	15,202,674	11,937,029	8,515,589
	TOTAL TOTAL CITE CITE			Max limit app	
21	TOTAL HQLA STOCK			14,255,329	11,789,874
22	TOTAL NET CASH OUTFLOWS			2,325,107	2,497,747
23	LIQUIDITY COVERAGE RATIO (%)			613,10	472,02

^(*) The average of last three months' liquidity coverage ratio calculated by weekly simple averages.

With regard of the Liquidity Coverage Ratio, banks disclose the essential issues as follows:

- a) Cash inflows and outflows do not have significant fluctuations because the Bank is less complex and cash inflows are higher than cash outflows during the period.
- b) Since the Bank is a development and investment bank and has no deposits, the Bank's high quality liquid asset stock primarily consists of cash, the accounts held at CBRT and unencumbered government bonds which are issued by Turkish Treasury.
- c) Important funding sources of the Bank are funds from CBRT rediscount loans, syndicated loans, short-term bilateral and trade loans from domestic and overseas banks, medium and long-term funds borrowed from international financial institutions like World Bank, European Investment Bank (EIB), Council of Europe Development Bank (CEB) and Islamic Development Bank (IDB) and funds obtained from capital market transactions by issuing debt securities.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

4 FINANCIAL RISK MANAGEMENT (continued)

- d) The most important items in derivatives held for hedging purposes are forwards for currency risks and swap transactions within the scope of interest rate risk.
- e) The Bank distributes funding sources between CBRT, domestic and overseas commercial banks and international development and investment institutions carefully and in a balanced manner. For its loans granted, the Bank's applies the principle of taking primary quality liquid collaterals such as guarantee letters and bills of guarantee. To prevent concentration risk, the bank closely monitors the breakdown of collaterals taken from banks and the policy of not taking risks up to 20% of each banks' total cash and non-cash loans, excluding treasury transactions, is followed by limit controls.
- f) Taking into account the legal and operational liquidity transfer inhibiting factors, the needed funds and the liquidity risk exposure based on the Bank itself, the branches in foreign countries and consolidated partnerships: None.
- g) Information on cash inflow and outflow items which are thought to be related to the Bank's liquidity profile included in the calculation of liquidity coverage ratio but not included in the public disclosure template on the second paragraph: None.

As of 31 December 2021 and 31 December 2020, the distribution of assets and liabilities of the Bank according to their remaining maturities is presented in the table below.

			31 December	2021		
	Up to 3	3 months to 1	1 year to 5	Over 5	No stated	
	months	year	years	years	Maturity (*)	Total
Cash Cash and due from banks	5,540,447	-	_	-	13,940,363	19,480,810
Financial assets measured at fair value through profit or loss	-	-	178,275	-	-	178,275
Derivative financial instruments	40,982	-	_	-	-	40,982
Derivative assets held for risk management	45,434	511.993	883,948	56,732	-	1,498,107
Loans and advances	56,402,074	135,520,421	72,724,927	21,276,386	559,756	286,483,564
Investment securities - Financial assets measured at fair value						
through other comprehensive income	-	7,380	767,855	498,702	117,530	1,391,467
- Financial assets measured at amortized cost	1,365,009	-	6,559,265	2,031,708	-	9,955,982
Property and equipment and intangible assets	-	-	-	-	23,271	23,271
Subsidiaries (Net)	-	-	-	-	73,000	73,000
Investment property	-	-	-	-	2,008	2,008
Other assets	-	-	-	-	1,111,190	1,111,190
Total assets	63,393,946	136,039,794	81,114,270	23,863,528	15,827,118	320,238,656
Funds borrowed	60,492,633	149,037,956	28,871,403	10,815,275	-	249,217,267
Subordinated loans	97,368	-	2,524,710	2,901,759	-	5,523,837
Debt securities in issue	-	6,739,447	30,544,857	-	-	37,284,304
Interbank market deposits	2,517,560	1,718,158	2,281,963	-	-	6,517,681
Derivative financial liabilities	638	_	_	_	_	638
Derivative liabilities held for risk management	-	-	116,339	-	-	116,339
Other liabilities	220,959	111,820	-109,371		6,770,244	6,993,652
Lease liabilities	-	5,923	_	-	-	5,923
Reserve for employee benefits	-	-	-	-	33,824	33,824
Total liabilities	63,329,158	157,613,304	64,229,901	13,717,034	6,804,068	305,693,465
Net liquidity gap	60,492,633	149,037,956	28,871,403	10,815,275	-	249,217,267

^(*) The expected credit loss for the loans and advances, banks and financial assets measured at amortized cost is shown in the no stated maturity column.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

FINANCIAL RISK MANAGEMENT (continued)

4

			31 Decemb	per 2020		
	Up to 3	3 months to 1	1 year to 5	Over 5	No stated	
	months	year	years	years	maturity (*)	Total
Cash and due from banks	6,581,892	_	_	_	5,099,538	11,681,430
Financial assets measured at fair value through	0,001,002				2,022,000	11,001,.00
profit or loss	_	_	78,554	74,900	_	153,454
Derivative financial assets	25,960	264		,,,,,,,,,	_	26,224
Derivative assets held for risk management	19,662	83.057	345,841	17,553	_	466,113
Loans and advances	27,048,013	87,325,335	57,887,860	4,879,689	490.024	177,630,921
Investment securities		0.,020,000	2.,00.,000	.,,	., .,	,
- Financial assets measured at fair value						
through other comprehensive income	39,911	40,839	309,081	322,700	92,778	805,309
- Financial assets measured at amortized cost	909,292	2,791,413	2,762,505	4,174,332	-	10,637,542
Property and equipment and intangible assets	-	-	-	-	27,751	27,751
Investment property	-	-	_	-	2,111	2,111
Other assets	-	-	-	-	1,637,715	1,637,715
Total assets	34,624,730	90,240,908	61,383,841	9,469,174	7,349,917	203,068,570
Funds borrowed	11,475,166	89,304,390	51,153,029	8,163,123	-	160,095,708
Subordinated liabilities	6,023	6,023	1,513,632	2,937,898	-	4,463,576
Debt securities in issue	3,990,064	3,625,951	15,337,245	-	-	22,953,260
Interbank market deposits	-	1,055,618	319,948	-	-	1,375,566
Derivative financial liabilities	12,214	102,715	-	-	-	114,929
Derivative liabilities held for risk management	-	-	234,057	442,142	-	676,199
Other liabilities	25,737	43,388	3,999	-	1,875,617	1,948,741
Reserve for employee benefits	-	-	-	-	26,331	26,331
Total liabilities	15,509,204	94,138,085	68,561,910	11,543,163	1,901,948	191,654,310
Net liquidity gap	19,115,526	(3,897,177)	(7,178,069)	(2,073,989)	5,447,969	11,414,260

^(*) The expected credit loss for the loans and advances, banks and financial assets measured at amortized cost is shown in the no stated maturity column

The distribution of the undiscounted cash flows of the financial liabilities of the Bank according to their remaining maturities as at 31 December 2021 and 31 December 2020 are presented in the tables below:

31 December 2021								
	Carrying amount	Demand and up to 3 months	3 months to 1 year	1 year to 5 years	Over 5 years	No maturity stated	Total	
Funds borrowed	249,217,267	60,776,742	149,682,815	29,846,730	10,835,276	ó -	251,141,563	
Debt securities in issue	5,523,837	181,514	181,514	4,255,239	3,627,815	-	8,246,082	
Subordinated liabilities	37,284,304	140,107	8,047,887	33,720,355	-	-	41,908,349	
Interbank money market deposits	6,517,681	2,398,302	1,780,645	2,353,042	-	-	6,531,989	
Other financial liabilities (1)	6,987,729	12,995	111,481	1,563	-	6,867,613	6,993,652	
Total financial liabilities	305,530,818	63,509,660	159,804,342	70,176,929	14,463,091	6,867,613	314,821,635	

⁽¹⁾ Derivative liabilities held for risk management amounting TL 116,339 and retirement benefit obligations amounting to TL 33,824 are not included in other financial liabilities.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

FINANCIAL RISK MANAGEMENT (continued)

31 December 2020									
	Demand and					No			
	Carrying amount	up to 3 months	3 months to 1 year	1 year to 5 years	Over 5 years	maturity stated	Total		
Funds borrowed	160,095,708	20,147,365	81,586,951	51,035,907	9,587,424	_	162,357,647		
Debt securities in issue	4,463,576	181,514	181,514	3,154,371	3,990,843	-	7,508,242		
Subordinated liabilities	22,953,260	4,115,273	4,439,975	16,884,982	-	-	25,440,230		
Interbank money market deposits	1,375,566	-	1,076,331	336,117	-	-	1,412,448		
Other financial liabilities (1)	1,700,514	2,013	87,785	4,761	-	1,605,968	1,700,527		
Total financial liabilities	190,588,624	24,446,165	87,372,556	71,416,138	13,578,267	1,605,968	198,419,094		

Tax liabilities amounting TL 17,700, funds amounting TL 13, other provisions amounting TL 230,514, derivative financial instruments amounting TL 114,929, derivative liabilities held for risk management amounting TL 676,199 and retirement benefit obligations amounting to TL 26,331 are not included in other financial liabilities.

The undiscounted cash inflows and outflows of derivative transactions of the Bank at 31 December 2021 and 31 December 2020 are presented in the tables below:

		31 December 2021					
	Up to 3	3 months	1 year to 5	Over 5			
	months	to 1 year	years	years	Total		
Derivative financial assets and liabilities:							
Foreign exchange derivatives:							
- Outflow	2,583,080	-	-	-	2,583,080		
- Inflow	2,623,792	-	-	-	2,623,792		
Interest rate derivatives:							
- Outflow	_	-	_	-	_		
- Inflow	-	-	-	-	-		
Foreign exchange derivatives:							
- Outflow	4,961,818	7,668,510	21,364,427	547,997	34,542,752		
- Inflow	5,202,733	8,696,533	22,932,092	569,361	37,400,719		
Interest rate derivatives:	-, - ,	-,	, ,	,	, , -		
- Outflow	_	274,458	6,925,478	_	7,199,936		
- Inflow	-	354,388	6,947,638	-	7,302,026		
Total outflow	7,544,898	7,942,968	28,289,905	547,997	44,325,768		
Total inflow	7,826,525	9,050,921	29,879,730	569,361	47,326,537		

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

FINANCIAL RISK MANAGEMENT (continued)

4

	31 December 2020				
	Up to	3 months	1 year to	Over 5	
	3 months	to 1 year	5 years	years	Total
Derivative financial assets and liabilities:					
Foreign exchange derivatives:					
- Outflow	1,566,170	1,226,603	-	-	2,792,773
- Inflow	1,582,755	1,123,957	-	-	2,706,712
Interest rate derivatives:					
- Outflow	-	-	-	-	-
- Inflow	-	-	-	-	-
Derivatives held for risk management:					
Foreign exchange derivatives:					
- Outflow	259,392	4,645,698	20,039,273	848,747	25,793,110
- Inflow	420,952	5,019,006	20,005,974	801,204	26,247,136
Interest rate derivatives:					
- Outflow	3,761,649	147,285	3,980,687	-	7,889,621
- Inflow	3,781,314	197,926	4,078,202	-	8,057,442
Total outflow	5,587,211	6,019,586	24,019,960	848,747	36,475,504
Total inflow	5,785,021	6,340,889	24,084,176	801,204	37,011,290

(g) Derivative financial instruments held for hedging purposes

- The bond with the amount of USD 500 million, issued in September 2014 with a maturity of seven years and a fixed interest payment rate of 5.000% per six months, is subjected to hedge accounting by cross currency swap transactions in April 2018.
- The bond with the amount of USD 500 million, issued in September 2017 with a maturity of five years and a fixed interest payment rate of 4.250% per six months, is subjected to hedge accounting by cross currency swap transactions in September 2017.
- The bond with the amount of USD 500 million issued in May 2018 with a maturity of six years and a fixed interest payment rate of 6.125% per six months, is subjected to hedge accounting by cross currency swap transactions in May 2018. The Bank has signed a partial termination agreement dated 28 February 2020 and 13 May 2020 and has subjected USD 250 million and USD 50 million of this cross currency swap subject to hedge accounting to partial termination, respectively.
- The bond with the amount of USD 500 million, issued in January 2019 with a fixed interest payment rate of 8.250% per six months, is subjected hedge accounting by cross currency swap transactions in January 2019.

Also, the changes in the fair values of USD debt securities, issued in February 2016 and in October 2016 amounting to USD 500 million, with 5 years and 7 years maturities, respectively, with 5.000% and 5.375% fixed interest rates, due to the fluctuation in Libor interest rates are hedged by applying fair value hedge accounting with interest rate swap transactions.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

4 FINANCIAL RISK MANAGEMENT (continued)

Fair value hedge accounting

Starting from 1 January 2013, the Bank applies "Fair Value Hedge Accounting".

The impact of fair value hedge accounting is summarized in the table below:

		31 December 2021		
			Net fair valu	e of the hedging
Hedging	Hedged item (asset and	Nature of hedge		instrument
instrument	liability)	risks	Asset	Liability
	Fixed interest rate US dollar	Fixed interest rate		
Interest rate swap	debt securities	risk	101,802	-
Cross currency	Fixed interest rate US dollar	Currency and interest		
swap	debt securities	rate risk	1,299,905	18,943

		31 December 2020		
			Net fair valu	e of the hedging
Hedging	Hedged item (asset and	Nature of hedge		instrument
instrument	liability)	risks	Asset	Liability
	Fixed interest rate US dollar	Fixed interest rate		
Interest rate swap	debt securities	risk	167,620	-
Cross currency	Fixed interest rate US dollar	Currency and interest		
swap	debt securities	rate risk	280,940	7,301

The Bank evaluates the effectiveness of the hedge accounting at initial date and at every reporting period. Effectiveness test is performed by using "Dollar off-set method". The Bank continues the hedge accounting if the effectiveness is between 80% and 125%.

Changes in fair values of derivative transactions determined for fair value hedge are recorded in the statement of profit or loss together with the changes in the fair value of the hedged asset or liability. The difference in the fair values of derivative transactions determined for fair value hedge is monitored in the "Income/losses from derivative financial transactions" account. In the statement of financial position, changes in the fair value of the hedge asset or liability, during the period in which hedge accounting is effective, is shown together with the related asset or liability. In the circumstances where the underlying hedge is not in conformity with the hedge accounting requirements, the adjustments made to the carrying value of the hedged item, are amortized with the straight-line amortization method within the time to maturity and are recognized under the "Income/losses from derivative financial transactions" account in the statement of profit or loss.

At the inception date, the Bank documents the relationship between the hedging instruments and hedged items required by the fair value hedge accounting in accordance with IAS 39 and its own risk management policies and principles. Every individual relationship is approved and documented in the same way in accordance with the Bank's risk management policies. Effectiveness tests were chosen among methods allowed within the context of IAS 39 in accordance with the Bank's risk management policies. The Bank's assumptions, which used for determining fair values of derivative instruments, were used while calculating fair value of hedged items on the effectiveness tests. The effectiveness tests are performed and effectiveness of risk relations are measured on a monthly basis. The effectiveness tests are performed rewardingly at the beginning of risk relations. If the underlying hedge does not conform to the accounting requirements (out of 80%-125% effectiveness range) or if the management voluntarily decides to discontinue the hedging relation or the hedging instrument is sold or closed before its maturity, in the context of the fair value hedge, adjustments on the carrying value of the hedged item is reflected on the on "Gains/(losses) on financial assets measured at fair value through profit or loss" accounts by using straight line method of amortization.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

4 FINANCIAL RISK MANAGEMENT (continued)

Cash flow hedge accounting

Starting from 13 August 2015, the Bank uses "Cash Flow Hedge Accounting".

The derivative financial instruments used as hedging instruments in Cash Flow Hedge Accounting are cross currency swaps.

		31 Decemb	ber 2021		
Type of hedging	Hedge item (asset	Nature of hedge	Fair value difference of	- 100	value of the instrument
instrument	and liability)	risks	the hedge item	Asset	Liability
Cross currency swap	Floating interest rate US dollar borrowings	Currency and interest rate risk	73,439	96,400	97,397
		31 Decemb	ber 2020		
Type of hedging	Hedge item (asset	Nature of hedge	Fair value difference of the hedge item		value of the instrument

hedging Hedge item (asset Nature of hedge difference of hedging instrument instrument and liability)

Floating interest
Cross currency rate US dollar Currency and interest swap borrowings rate risk 33,017 17,553 668,898

The Bank has documented the required rules and conditions of cash flow hedge accounting under the framework of its risk policies and IAS 39 as a written process. Every individual hedging relationship is reviewed and taken through the related approval process and is documented. In accordance with the

The Bank has documented the required rules and conditions of cash flow hedge accounting under the framework of its risk policies and IAS 39 as a written process. Every individual hedging relationship is reviewed and taken through the related approval process and is documented. In accordance with the Bank's risk management policies. The effectiveness tests have been chosen among the methods permissible in accordance with IAS 39 following the Bank's risk strategies. Again, under the related process, effectiveness tests are performed on each reporting period and the effectiveness of risk relations are measured. If the application is outside of the threshold requirements (80%-125%) or if the management voluntarily decides to discontinue the hedging relationship or the hedging instrument is sold or closed before its maturity, the cumulative gain or loss on the hedging instrument that has been recognized in other comprehensive income from the period when the hedge was effective remains separately in equity until the forecasted transaction occurs. The gains or losses accounted directly under equity in the circumstances where the transaction is conducted, are reclassified under the "Income/Losses from Derivative Financial Instruments" account in the statement of profit or loss when the acquired asset or liability affects the profit or loss of the related period or periods.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

4 FINANCIAL RISK MANAGEMENT (continued)

(h) Fair value of financial instruments

Fair value is the amount at which a financial instrument could be exchanged in a current transaction between willing parties, other than in a forced sale or liquidation, and is best evidenced by a quoted market price, if one exists.

The estimated fair values of financial instruments have been determined by the Bank using available market information and appropriate valuation methodologies. However, judgment is necessarily required to interpret market data to develop the estimated fair value. Accordingly, the estimates presented herein are not necessarily indicative of the amounts the Bank could realize in a current market exchange.

The following methods and assumptions that could be applicable to estimate the fair value of the Bank's financial instruments are as below:

(i) Financial assets

The fair values of certain financial assets carried at cost or amortized cost, including cash and due from banks (including receivables from CBRT) are considered to approximate their respective carrying values due to their short-term nature.

The fair value of investment securities has been determined based on bid market prices at reporting dates. Loans and advances are presented with their calculated registered amounts net of provisions for impairment.

The estimated fair value of fixed rate loans and advances is calculated by calculating their discounted cash flows using the current market rates.

The fair value of other financial assets is also considered to approximate their respective carrying values due to their nature.

(ii) Financial liabilities

The total fair value of funds borrowed is calculated based on quoted market prices and based on the calculation of discounted cash flows using current interest rates.

The fair value of other financial liabilities is considered to approximate their respective carrying values due to their nature.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

4 FINANCIAL RISK MANAGEMENT (continued)

(iii) Derivative financial assets and liabilities

The fair values of foreign exchange and interest rate swaps have been estimated based on quoted market rates prevailing at the reporting date.

The following table summarizes the carrying amounts and fair values of those significant financial assets and liabilities not presented on the Bank's statement of financial position at their fair value.

	31 December 2021		31 Decemb	per 2020
	Carrying		Carrying	_
	value	Fair value	value	Fair value
Financial assets:				
Cash and due from banks	19,480,810	19,480,810	11,681,430	11,681,430
Investment securities				
- Financial assets measured at fair				
value through profit or loss	178,275	178,275	153,454	153,454
- Financial assets measured at fair	,		, -	, -
value through other comprehensive				
income (1)	10,575	10,575	10,575	10,575
	10,575	10,575	10,575	10,575
- Financial assets measured at	0.055.003	0.502.526	10 607 540	10 202 227
amortized cost	9,955,982	8,583,526	10,637,542	10,292,327
Loans and advances	286,483,564	300,269,049	177,630,921	185,439,400
Financial liabilities:				
Funds borrowed	249,217,267	260,703,272	160,095,708	165,883,640
Debt securities in issue	37,284,304	35,940,234	22,953,260	22,886,387
Subordinated loans	5,523,837	5,523,837	4,463,576	4,463,576
Interbank money market deposits	6,517,681	6,517,681	1,375,566	1,375,566
more in market deposits	0,017,001	5,517,001	1,270,000	1,070,000

⁽¹⁾ Garanti Faktoring AŞ shares amounting to TL 106,956 and Eximbank Securities are not included (31 December 2020: TL 84,957).

The fair values of financial assets measured at amortized cost are accepted as Level 1 and fair values of loans and advances are accepted as Level 2. Fair values of funds borrowed and debt securities are accepted as Level 2.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

4 FINANCIAL RISK MANAGEMENT (continued)

The following table summarizes the fair values of those financial assets and liabilities presented on the Bank's statement of financial position based on the hierarchy of valuation technique as of 31 December 2021 and 31 December 2020.

31 December 2021	Level 1 ⁽¹⁾	Level 2 ⁽²⁾	Level 3 ⁽³⁾	Total
Financial agents at fair value through				
Financial assets at fair value through profit or loss				
- Trading securities	178,275			178,275
- Derivative financial instruments	170,273	40,982	-	40,982
- Derivative intalicial historiems - Derivative assets held for risk management	-	1,498,107	-	1,498,107
Financial assets measured at fair value through	-	1,490,107	_	1,490,107
other comprehensive income				
- Equity investments (4)	106,956	_	_	106,956
- Debt securities	1,273,936	_	_	1,273,936
- Debt securities	1,273,730	_	_	1,273,730
Total assets	1,559,167	1,539,089	-	3,098,256
Financial liabilities at fair value through				
profit or loss				
- Derivative financial instruments	-	638	-	638
- Derivative liabilities held for risk management	-	116,339	-	116,339
Total liabilities		116,977		116,977

Fair values are calculated with quoted prices (unadjusted) in active markets for listed equity investments and debt instruments. This level includes listed equity investments and debt instruments actively traded on exchanges.

Fair values are calculated with observable input parameters (either directly as prices or indirectly as derived from prices) for derivative transactions. This level includes OTC derivative contracts.

Fair values are calculated by taking unobservable inputs as a basis.

Unquoted equity investments which are accounted with their cost amount to TL 10,575 are excluded.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

FINANCIAL RISK MANAGEMENT (continued)

31 December 2020	Level 1 ⁽¹⁾	Level 2 ⁽²⁾	Level 3 ⁽³⁾	Total
Financial agasta at fair value through				
Financial assets at fair value through profit or loss				
- Trading securities	153,454	_	_	153,454
- Derivative financial assets	-	26,224	_	26,224
- Derivative assets held for risk management	_	466,113	_	466,113
Financial assets measured at fair value through				, -
other comprehensive income				
- Equity investments (4)	84,957	-	-	84,957
- Debt securities	709,777	-	-	709,777
Total assets	948,188	492,337	-	1,440,525
Financial liabilities at fair value through				
profit or loss				
- Derivative financial liabilities	-	114,929	-	114,929
- Derivative liabilities held for risk management	-	676,199	-	676,199
Total liabilities		791,128		791,128

Fair values are calculated with quoted prices (unadjusted) in active markets for listed equity investments and debt instruments. This level includes listed equity investments and debt instruments actively traded on exchanges.

(i) Capital management

The BRSA sets and monitors capital requirements for the Bank as a whole. The Bank is directly supervised by local regulators. In implementing current capital requirements, the BRSA requires the banks to maintain a prescribed ratio of minimum 8% of total capital to total value at credit, market and operational risks. The Bank regulatory capital is analyzed into two tiers:

- Tier 1 capital, which includes paid-in capital, share premium, legal reserves, retained earnings, other comprehensive income, translation reserve and non-controlling interests after deductions for goodwill and certain cost items.
- Tier 2 capital, includes qualified subordinated liabilities and general provisions. In order to protect banks, the BRSA requires banks to maintain prescribed ratios of minimum 6% and 4.5% of Tier 1 and Tier 2 capital, respectively, to total credit, market and operational risks starting from 1 January 2014.

Banking operations are categorized as either trading book or banking book, and risk-weighted assets are determined according to specified requirements that seek to reflect the varying levels of risk attached to assets and off-balance sheet exposures. The Bank's policy is to maintain a strong capital base so as to maintain investor, creditor and market confidence and to sustain future development of the business.

Fair values are calculated with observable input parameters (either directly as prices or indirectly as derived from prices) for derivative transactions. This level includes OTC derivative contracts.

⁽³⁾ Fair values are calculated by taking unobservable inputs as a basis.

⁽⁴⁾ Unquoted equity investments which are accounted with their cost amount to TL 10,575 are excluded.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

4 FINANCIAL RISK MANAGEMENT (continued)

The Bank's regulatory capital position on at 31 December 2021 and 31 December 2020 were as follows:

	31 December 2021 (*)	31 December 2020
Tier I capital	16,772,948	12,760,951
Tier II capital	3,447,891	3,383,632
Total regulatory capital	20,220,839	16,144,583
Amount subject to credit risk	108,509,547	77,593,027
Amount subject to market risk	334,850	525,675
Amount subject to operational risk	3,392,163	2,537,427
Total regulatory capital expressed as a percentage of		
total value at credit, market and operational risks (%)	18.02	20.02
Total tier 1 capital expressed as a percentage of		
total value at credit, market and operational risks (%)	14.94	15.82

(*) As of

5 CRITICAL ACCOUNTING ESTIMATES AND JUDGEMENTS IN APPLYING ACCOUNTING POLICIES

The Bank makes estimates and assumptions that affect the reported amounts of assets and liabilities within the next financial period. Estimates and judgments are continually evaluated and are based on historical experience and other factors, including expectations of future events that are believed to be reasonable under the circumstances.

(a) Allowances for credit losses

The measurement of impairment losses under IFRS 9 across all categories of financial assets particularly requires the estimation of the amount and timing of future cash flows and collateral amounts and the evaluation of a significant increase in credit risk. These estimates are driven by a number of factors, changes in which can result in different levels of allowances. The Bank's ECL calculations are outputs of complex models with a number of underlying assumptions regarding the choice of variable inputs and their interdependencies.

Coronavirus pandemic, which has recently emerged in China, spread to various countries around the world affects global economic conditions negatively, as well as causing malfunctions in operations, especially in countries exposed to the epidemic. As a result of the spread of COVID-19 throughout the world, various measures have been taken in Turkey as well as in the world and still continue to be taken in order to prevent the transmission of the virus. In addition to these measures, economic measures are also taken to minimize the economic impact of the virus outbreak on individuals and businesses in Turkey and worldwide. The necessary measures are evaluated by the Bank management to keep the negative effects that may arise under control and to live at the minimum level.

(b) Fair value of derivatives

The fair values of financial instruments that are not traded in the organized markets are determined by using valuation techniques. The valuation techniques used in the determination of fair values are reviewed periodically and approved by experienced employees.

^{(*) 31} December 2021, the Bank has calculated the amount subject to credit risk in the calculations of the legal capital adequacy ratio, taking into account the simple arithmetic average of the Central Bank's foreign exchange buying rates for the last 252 business days before the report date.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

CASH AND DUE FROM BANKS

6

	31 December 2021	31 December 2020
Cash funds:		
Cash on hand	-	10
		10
Current accounts and demand deposits:		
Central Bank of Republic of Turkey (CBRT)	11,300,265	5,005,572
Foreign banks	2,624,140	84,034
Domestic banks	16,271	10,430
	13,940,676	5,100,036
Time deposits:		
Central Bank of Republic of Turkey (CBRT)	_	_
Foreign banks	-	200,688
Domestic banks	3,211,000	4,692,961
	3,211,000	4,893,649
	, ,	· · · · · · · · · · · · · · · · · · ·
Interbank money market placements	2,329,447	1,688,243
Expected credit loss	(313)	(508)
Total cash and due from banks	19,480,810	11,681,430

Cash and cash equivalents included in the statements of cash flows for the periods ended 31 December 2021 and 31 December 2020 are as follows:

	31 December 2021	31 December 2020
Cash and due from banks	19,480,810	11,681,430
Less: Interest accruals	(2,279)	(11,882)
Add: Expected credit losses	313	508
Cash and cash equivalents	19,478,844	11,670,056

Cash and cash equivalents are mainly composed of bank deposits as of 31 December 2021 and 31 December 2020.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

DERIVATIVE FINANCIAL ASSETS AND LIABILITIES

7

The Bank utilizes the following derivative financial assets and liabilities:

"Currency and interest rate swaps" are commitments to exchange one set of cash flows for another. Swaps result in an exchange of currencies or interest rates. Currency swaps involve the exchange of principal as well. The Bank's "credit risks" represents the potential cost of replacing the swap contracts if counterparties fail to perform their obligation. This risk is monitored on an ongoing basis with reference to the current fair value, a proportion of the notional amount of the contracts and the liquidity of the market. To control the level of credit risk taken, the Bank assesses counterparties using the same techniques as for its lending activities.

The notional amounts of certain types of financial instruments provide a basis for comparison with instruments recognized on the statement of financial position but do not indicate the amounts of future cash flows involved or the current fair value of the instruments and, therefore, do not indicate the Bank's exposure to credit or price risks. The derivative instruments become favorable (as assets) or unfavorable (as liabilities) as a result of fluctuations in foreign exchange rates and interest rates. The aggregate contractual or notional amount of derivative financial instruments on hand, the extent to which instruments are favorable or unfavorable and, thus the aggregate fair values of derivative financial assets and liabilities can fluctuate significantly from time to time.

The fair values of derivative financial assets and liabilities held as of 31 December 2021 and 31 December 2020 are set out in the following table:

	31 December 2021		31 Dece	ember 2020
	Fair	Fair value		r value
	Assets	Liabilities	Assets	Liabilities
Interest rate and currency swaps purchases and				
sales	-	-	-	-
Forward purchases and sales	-	-	761	(825)
Foreign currency swaps purchases and sales	-	-	-	-
Cross currency and basis swaps purchases and sales	40,982	(638)	25,463	(114,104)
Option purchases and sales	-	-	-	-
Total derivative assets/(liabilities)	40,982	(638)	26,224	(114,929)

Even though certain derivative transactions, providing effective economic hedges under the Bank's risk management position, do not qualify for hedge accounting under the specific rules in IAS 39 which is permitted to be applied in IFRS 9 and are therefore treated as derivatives financial assets. Hedge accounting is explained in detail in Note 4.

The notional amounts of derivative transactions are explained in detail in Note 26.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

8 LOANS AND ADVANCES

The Bank follows loans and advances under as corporate loans; the classifications in the table below mainly refer to lending programs of the Bank to corporate customers;

	31 December 2021	31 December 2020
GT		
Short-term	166 540 161	112 (24 147
Discount loans	166,548,161	113,624,147
Financial institutions	7,692,909	7,369,587
Export guaranteed loans	4,886,531	3,304,046
Specialized loans	286,825	204,389
Other guaranteed loans	190	241
	179,414,616	124,502,410
Medium and long-term		
Export guaranteed loans	60,472,468	24,758,720
Export guaranteed investment loans	20,368,329	13,253,728
Financial institutions	11,459,394	5,326,669
Foreign country loans (political risks)	8,832,677	5,498,684
Specialized loans	3,004,446	665,815
Other	13,134	32,607
	104,150,448	49,536,223
Performing loans	283,565,064	174,038,633
	, ,	, ,
Loans under close monitoring	3,008,715	3,339,967
Impaired loans and advances	559,756	1,031,915
Gross loans and advances	287,133,535	178,410,515
Expected and it leaves Store 1	(04.201)	(95.224)
Expected credit losses- Stage 1	(84,201)	(85,234)
Expected credit losses- Stage 2	(6,014)	(3,990)
Expected credit losses- Stage 3	(559,756)	(690,370)
Net loans and advances	286,483,564	177,630,921

The Bank provides impairment provision for non-performing loans amounting to TL 559,756 (31 December 2020: TL 1,031,915) comprising 0.20% (31 December 2020: 0.58%) of the total loans outstanding at 31 December 2021.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

8 LOANS AND ADVANCES (continued)

Movements in the provision for impairment losses for the periods ended 31 December 2021 and 31 December 2020 are as follows:

	31 December 2021	31 December 2020
Balance at the beginning of the period	779,594	466,897
Recoveries and reversals (*)	(263,813)	(56,772)
Provision for the period	134,190	369,469
Balance at the end of the period	649,971	779,594

^(*)The Bank has derecognized non-performing loans amounting to TL 22,587 in the current period. Write-off of the non-performing loans and receivables is not considered, during the legal follow-up process concerning the collection of receivables.

Loans and advances to the public and private sectors are as follows:

	31 December 2021	31 December 2020
Private sector	270,161,882	167,026,136
Public sector	16,321,682	10,604,785
	286,483,564	177,630,921

The following tables provide a summary of the Bank's forborne assets as of December 31, 2021

			S	tage 2			St	tage 3			
					Total				Total Non-		
	Gross				Performing				Performing	Total	
	Carrying	Temporary	Permanent		Forborne	Temporary	Permanent		Forborne	Forborne	Forbearance
	Amount	Mod.	Mod	Refinancing	Loans	Mod.	Mod	Refinancing	Loans	Loans	Ratio
Corporate Lending	2,488,551	-	2,475,691	-	2,475,691	-	-	-	-	2,475,691	0,86
Consumer Lending	-	-	-	-	-	-	-	-	-	-	-
Total	2,488,551	-	2,475,691	-	2,475,691	_	_	-	_	2,475,691	0,86

9 INVESTMENT SECURITIES

(a) Financial assets measured at fair value through other comprehensive income:

	31 December 2021	31 December 2020
Financial assets measured at fair value through		
other comprehensive income		
Debt securities		
- Listed	1,273,937	709,777
- Unlisted	-	-
Equity investments		
- Listed	-	-
- Unlisted	117,530	95,532
Total	1,391,467	805,309

As of 31 December 2021, securities amounting to TL 750,209 (31 December 2020: 439,424) have been pledged under repurchase agreement.

As of 31 December 2021 and 31 December 2020, unrealized gain and losses arising from changes in the fair value of securities classified as financial assets measured at fair value through other comprehensive income are recognized in the statement of other comprehensive income, however, if there is permanent impairment in the value of the mentioned asset, it is reflected the statement of profit or loss.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

9 INVESTMENT SECURITIES (continued)

(a) Financial assets measured at fair value through other comprehensive income (continued):

The breakdown of equity investments classified as financial assets measured at fair value through other comprehensive income at 31 December 2021 and 31 December 2020 are as follows:

		Carrying		Carrying	
	Share %	amount	Share %	amount	
	31 December	31 December	31 December	31 December	
Equity investments	2021	2021	2020	2020	Business
Garanti Faktoring A.Ş.	9.78	106,956	9,78	84,957	Factoring
Kredi Garanti Fonu A.Ş.	1.49	7,659	1,49	7,660	Financial services
Borsa İstanbul A.Ş.	-	160	-	160	Financial services
JCR Avrasya Derecelendirme A.Ş.	2.86	2,755	2,86	2,755	Rating institution
		117,530		95,532	

The movements of FVOCI investments are summarized as follows;

	31 December 2021	31 December 2020
Balances at January 1	805,309	37,822
Additions	233,582	1,649,507
FX Diff	591,548	(4,893)
Disposals	(146,505)	(976,841)
Amortisation	· · · · · · · · · · · · · · · · · · ·	· , , , , , , , , , , , , , , , , , , ,
Gains/Loss from changes in FV	(92,467)	99,714
Balances at December 31	1,391,467	805,309

(b) Financial assets measured at amortized cost:

	31 December 2021	31 December 2020
Debt securities - Government bonds	9,955,982	10,637,542
Total	9,955,982	10,637,542

As of 31 December 2021 and 31 December 2020, government bonds and treasury bills amounting to TL 143,820 (31 December 2020: TL 1,013,797) have been pledged as collateral with the CBRT and Borsa İstanbul AŞ-Settlement and Custody Bank and securities amounting to TL 9,690,905 (31 December 2020: 1,519,521) have been pledged under repurchase agreement.

The movement of securities classified as financial assets measured at amortized costs as at 31 December 2021 and 31 December 2020 are as follows:

	31 December 2021	31 December 2020
Balance at 1 January	10,637,542	7,089,499
Purchases	1,500	1,724,460
Redemptions	(6,423,913)	-
Foreign exchange difference	5,537,917	1,715,963
Interest income accruals	202,864	108,172
Expected credit loss	72	(552)
Amount at the end of the period	9,955,982	10,637,542

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

PROPERTY AND EQUIPMENT

10

				Other		
		Leased		Tangible	Leasehold	
	Buildings (*)	Assets	Vehicles	Assets	Improvements	Total
Cost	22.254	21	4.220	16045	14057	57.017
Opening balance, 1 January 2020	22,354	31	4,330	16,245	14,257	57,217
Additions	861	-	-	3,427	-	4,288
Disposals	-	- (24)	-	(15)	-	(15)
Transfers	-	(31)	31	-	-	-
Closing balance, 31 December 2020	23,215	-	4,361	19,657	14,257	61,490
Accumulated depreciation:						
Opening balance, 1 January 2020	6,948	31	3,339	10,352	14,257	34,927
Additions	6,460	_	276	2,271	-	9,007
Disposals	-	_	-	(10)	-	(10)
Transfers	-	(31)	31	-	-	-
Closing balance, 31 December 2020	13,408	-	3,646	12,613	14,257	43,924
Cost						
Opening balance, 1 January 2021	23,215	-	4,361	19,657	14,257	61,490
Additions	2,076	-	-	655	348	3,079
Disposals	(1,216)	-	(812)	(39)	-	(2,067)
Transfers	-	-	-	-	-	-
Closing balance, 31 December 2021	24,075	-	3,549	20,273	14,605	62,502
Accumulated depreciation:						
Opening balance, 1 January 2021	13,408	_	3,646	12,613	14,257	43,924
Additions	6,991	_	204	2,309	31	9,535
Disposals	(634)	_	(812)	(30)	-	(1,476)
Transfers	-	_	-	. ,	-	-
Closing balance, 31 December 2021	19,765	-	3,038	14,892	14,288	51,983
As at 31 December 2020, net	0.01-					
carrying value	9,807	-	715	7,044	-	17,566
As at 31 December 2021, net						
carrying value	4,310	-	511	5,381	317	10,519

^(*) Right of use assets are included in this column.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

11 INTANGIBLE ASSETS

	Intangible assets
Cost	
Opening balance, 1 January 2020	14,257
Additions	4,567
Disposals	-
Closing balance, 31 December 2020	18,824
Accumulated amortization:	
Opening balance, 1 January 2020	(7,137)
Additions	(1,502)
Disposals	-
Closing balance, 31 December 2020	(8,639)
Cost	
Opening balance, 1 January 2021	18,824
Additions	5,062
Disposals	<u>-</u>
Closing balance, 31 December 2021	23,886
Accumulated amortization:	
Opening balance, 1 January 2021	(8,639)
Additions	(2,495)
Disposals	<u>-</u>
Closing balance, 31 December 2021	(11,134)
As at 31 December 2020, net carrying value	10,185
As at 31 December 2021, net carrying value	12,752

12 INVESTMENT PROPERTY

As of 31 December 2021, The Bank has net investment property amounting to TL 2,008 (31 December 2020: TL 2,111).

Istanbul service building which is previously accounted as tangible asset is classified to investment property account in accordance with IAS 40 Investment Property after the building is leased to Investment Support and Promotion Agency of Turkey.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

13 OTHER ASSETS

	31 December 2021	31 December 2020
Financial assets		
Guarantees given	764,398	452,028
Prepayments	112,334	967,990
Receivables from Reassurance Companies	132,909	105,967
Notes receivable	74,019	47,933
Receivables from banks	2,836	575
Other	126,927	91,127
	1,213,423	1,665,620
Expected credit losses	(102,233)	(27,905)
	1,111,190	1,637,715

14 FUNDS BORROWED AND INTERBANK MONEY MARKET DEPOSITS

	31 December 2021	31 December 2020
Interbank money market deposits – TL	6,517,681	1,375,566
Domestic banks	180,961,351	120,807,970
Foreign banks	68,255,916	39,287,738
Funds borrowed	249,217,267	160,095,708
Funds borrowed and interbank money market		
deposits total	255,734,948	161,471,274

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

14 FUNDS BORROWED AND INTERBANK MONEY MARKET DEPOSITS (continued)

The breakdown of funds borrowed as of 31 December 2021 and 31 December 2020 is as follows:

		Original			
		currency amount	Original		Maturity date
31 December 2021	Interest rate	(thousands)	currency	TL	(year)
Due to Central Bank	(LIBOR/EURIBOR + 0%)	(monsumus)	currency	167,237,999	()(41)
CBRT Loan	(EID GIG Z GILD GIL + G/G)	3,323,330	TRY	3,323,330	
CBRT Loan		5,747,406	USD	75,788,165	
CBRT Loan		55,071	GBP	980,793	
CBRT Loan		5,846,861	EUR	87,145,711	
Due to IFIs	Libor/Euribor + %0,01-%2,95	2,0.0,000		18,650,840	
Black Sea Trade and Development Bank		50,136	EUR	747,257	22.12.2022-06.02.2023
Council of Europe Development Bank		115,610	EUR	1,723,125	8.02.2022-07.08.2025
European Investment Bank		195,145	EUR	2,908,583	30.06.2022-23.12.2024
European Investment Bank		36,424	USD	480,302	16.01.2024-29.07.2024
Islamic Development Bank		240,894	USD	3,176,544	14.04.2026-31.05.2030
World Bank		36,625	EUR	545,877	1.03.2038
World Bank		437,987	USD	5,775,518	1.3.2038-15.7.2038
Asian Infrastructure Investment Bank		249,773	USD	3,293,634	14.11.2025
Due to Commercial Banks	Libor/Euribor + %0,70-%3,13	·		63,328,428	
ABC International		40,101	USD	528,792	15.02.2022-30.11.2022
China Development Bank		70,460	USD	929,127	23.02.2024
Citibank Türkiye		75,211	USD	991,767	21.01.2022-20.09.2022
Citibank		15,080	USD	198,858	19.01.2022
Doha Bank		50,314	USD	663,460	10.01.2022
ICBC Macau		350,978	USD	4,628,171	28.02.2022
ICBC Turkey		199,779	EUR	2,977,648	25.11.2022
ING DIBA - ICIEC Guaranteed Loan		55,534	EUR	827,720	4.12.2026
Intesa Sanpaolo SPA Turkey		201,470	EUR	3,002,858	10.03.2022-04.11.2022
Syndicated Loan MIZUHO		24,488	USD	322,914	19.08.2022
Standard Chartered Bank		81,450	EUR	1,213,989	17.01.2022-07.03.2022
Sumitomo Mitsui Banking Corporation		66,905	USD	882,247	06.07.2022-14.07.2022
Syndicated loan with IBRD Guarantee		491,448	EUR	7,324,881	26.06.2030-20.05.2031
Syndicated loan with ICIEC Guarantee		176,983	EUR	2,637,872	21.06.2024
Syndicated loan with MIGA Guarantee		568,217	EUR	8,469,105	28.03.2025-27.06.2028
Syndicated loan with MIGA Guarantee		553,777	USD	7,302,383	28.03.2025-27.06.2028
MUFG Bank Turkey		29,688	EUR	442,494	30.06.2022
Syndicated loan EUR		886,595	EUR	13,214,425	17.11.2022-23.05.2022
Syndicated loan USD		378,288	USD	4,988,298	17.11.2022-23.05.2022
TURKIYE VAKIFLAR BANKASI		20,205	EUR	301,149	23.05.2022
T.A.O.					
KT BANK AG		10,028	EUR	149,464	8.10.2021
VAKIF KATILIM BANKASI ANONİM		100,922	USD	1,330,806	17.05.2022
ŞİRKETİ					
Total funds borrowed				249,217,267	

⁽¹⁾ CBRT loans are rediscount loans extended by CBRT, having wide range of maturity dates.

⁽²⁾ Balance is denominated by USD.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

14 FUNDS BORROWED AND INTERBANK MONEY MARKET DEPOSITS (continued)

		Original			
		currency	Original		Maturity date
31 December 2020	Interest rate	amount (thousands)	currency	TL	(year)
Due to Central Bank	interest rate	(mousunus)	currency	114,972,607	(year)
CBRT Loan		6,960,378	EUR		(1
		, ,		62,999,775	(1)
CBRT Loan		6,033,741	USD	44,241,632	(1
CBRT Loan		7,769,415	TRY	7,429,709	
CBRT Loan		30,015	GBP	301,491	(1
	(LIBOR/EURIBOR				
Due to IFIs	+ 0.05% - 2.95%)			10,582,056	
Black Sea Trade and Development					
Bank		25,008	EUR	226,352	22/12/2022
Council of Europe Development Bank		166,875	EUR	1,510,419	08.02.2022-07.08.2025
European Investment Bank		305,873	EUR	2,768,515	17.12.2021-23.12.2024
European Investment Bank		49,884	USD	367,384	16.01.2024-29.07.2024
Islamic Development Bank		280,441	USD	2,065,365	14.04.2026-25.10.2027
World Bank (EFIL) Loans		38,863	EUR	351,760	01/03/2038
World Bank (EFIL) Loans		145,438	USD	1,071,107	01/03/2038
World Bank (LTEF) Loans		301,595	USD	2,221,154	15/07/2038
	(LIBOR/EURIBOR				
Due to Commercial Banks	+ 0.01% - 3.50%)			34,541,045	
Citibank		49,752	USD	366,411	05/04/2021
ICBC Macau		351,122	USD	2,585,905	28/02/2022
ICBC Turkey		200,498	EUR	1,814,751	25/11/2022
ING DIBA - ICIEC Guaranteed Loan		67,900	EUR	614,572	04/12/2026
Intesa Sanpaolo SPA, Istanbul Branch		55,546	EUR	502,754	12/07/2021
KT Bank AG		20,190	EUR	182,746	29.01.2021-16.07.2021
MIZUHO Corporate Bank Ltd		24,576	USD	180,999	27/07/2021
MUFG Bank London		32,352	EUR	292,820	04/06/202
NCB Bank		49,690	USD	365,952	17/05/2021
Standard Chartered Bank		43,236	EUR	391,338	02/03/2021
SMBC		86,715	USD	638,631	01.07.2021-14.04.2021
Syndicated loan with IBRD Guarantee		380,047	EUR	3,439,883	26/06/2030
Syndicated loan with ICIEC Guarantee		180,082	EUR	1,629,960	21/06/2024
Syndicated loan with MIGA Guarantee		641,087	EUR	5,802,611	28.03.2025-27.06.2028
Syndicated loan with MIGA Guarantee		672,396	USD	4,951,995	28.03.2025-27.06.2028
Syndicated loan		895,254	EUR	8,103,121	22.04.2021-17.11.202
Syndicated loan		361,866	USD	2,665,036	22.04.2021-17.11.202
Turk Bankası Ltd.		1,150	GBP	11,560	09/03/2021
	<u> </u>				<u> </u>
Total funds borrowed		21,738,252(2)	USD	160,095,708	

⁽¹⁾ CBRT loans are rediscount loans extended by CBRT, having wide range of maturity dates.

⁽²⁾ Balance is denominated by USD.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

14 FUNDS BORROWED AND INTERBANK MONEY MARKET DEPOSITS (continued)

The repayment of the funds borrowed were as follows during 2021:

	FX Type	Repayment amount	Dates
European Investment Bank	EUR	10,000,000	6.January.2021
European Investment Bank	USD	1,914,588	13.January.2021
Islamic Development Bank	USD	4,935,714	20.January.2021
European Investment Bank	USD	2,840,906	27.January.2021
European Investment Bank	EUR	2,375,000	27.January.2021
Council of Europe Development Bank	EUR	15,625,000	8.February.2021
European Investment Bank	USD	1,903,235	10.February.2021
World Bank (EFIL) Loans	USD	4,148,051	1.March.2021
World Bank (EFIL) Loans	EUR	1,109,760	1.March.2021
Standard Chartered Bank	EUR	43,000,000	2.March.2021
Syndicated loan	USD	10,416,667	29.March.2021
Syndicated loan	EUR	5,555,556	29.March.2021
Citibank	USD	49,500,000	5.April.2021
European Investment Bank	EUR	1,470,588	6.April.2021
Sumitomo Mitsui Banking Corporation Islamic Development Bank	USD USD	55,000,000 12,096,143	14.April.2021 14.April.2021
Syndicated loan	USD	50,000,000	22.April.2021
Syndicated loan	EUR	30,000,000	22.April.2021
Council of Europe Development Bank	EUR	5,000,000	26.April.2021
Islamic Development Bank	USD	2,253,857	26.April.2021
Syndicated loan	USD	2,142,857	7.May.2021
Syndicated loan	EUR	7,142,857	7.May.2021
NCB - National Commercial Bank of Saudi Arabia	USD	49,500,000	17.May.2021
Council of Europe Development Bank	EUR	5,000,000	17.May.2021
Syndicated loan	USD	211,000,000	21.May.2021
Syndicated loan	EUR	465,500,000	21.May.2021
MUFG Bank	EUR	32,000,000	4.June.2021
Syndicated loan with ICIEC Guarantee	EUR	5,652,632	4.June.2021
European Investment Bank	EUR	1,470,588	17.June.2021
European Investment Bank	EUR	15,000,000	21.June.2021
European Investment Bank	EUR	20,000,000	22.June.2021
Syndicated loan	USD	37,500,000	29.June.2021
Syndicated loan	EUR	14,285,714	29.June.2021
European Investment Bank	EUR	5,000,000	30.June.2021
Sumitomo Mitsui Banking Corporation	USD	30,000,000	1.July.2021
European Investment Bank Intesa SPA TR	EUR EUR	10,000,000	6.July.2021
European Investment Bank	USD	55,000,000 1,914,559	12.July.2021 13.July.2021
Islamic Development Bank	USD	4,935,714	19.July.2021
Mizuho Bank	USD	24,500,000	27.July.2021
European Investment Bank	USD	2,840,906	27.July.2021
European Investment Bank	EUR	2,375,000	27.July.2021
Council of Europe Development Bank	EUR	15,625,000	9.August.2021
European Investment Bank	USD	1,903,235	10.August.2021
World Bank (EFIL) Loans	USD	4,148,051	1.September.2021
World Bank (EFIL) Loans	EUR	1,109,760	1.September.2021
Syndicated loan	USD	10,416,667	28.September.2021
Syndicated loan	EUR	5,555,556	28.September.2021
European Investment Bank	EUR	1,470,588	4.October.2021
Islamic Development Bank	USD	12,096,143	14.October.2021
Islamic Development Bank	USD	2,253,857	25.October.2021
Council of Europe Development Bank	EUR	5,000,000	26.October.2021
Syndicated loan	USD	2,142,857	8.Novermber.2021
Syndicated loan	EUR	7,142,857	8.Novermber.2021
Council of Europe Development Bank	EUR	5,000,000	16.Novermber.2021
Sendikasyon Kredisi	USD	99,800,000	17.November.2021
Sendikasyon Kredisi	EUR	397,900,000	17.November.2021
Syndicated loan with ICIEC Guarantee	EUR	5,652,632 1,470,588	6.December.2021 17.December.2021
European Investment Bank European Investment Bank	EUR	1,470,588	20.December.2021
European Investment Bank European Investment Bank	EUR EUR	15,000,000 20,000,000	20.December.2021 22.December.2021
Syndicated loan	USD	37,500,000	29.December.2021
Syndicated loan Syndicated loan	EUR	14,285,714	29.December.2021
European Investment Bank	EUR	5,000,000	30.December.2021
Dar opean in resultent Dank	Lon	3,000,000	30.200111001.2021

^(*) Central Bank loans are rediscount loans extended by Central Bank, having wide range of maturity dates.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

DEBT SECURITIES IN ISSUE

15

Information regarding securities issued	31 December 2021	31 December 2020
Securities Issued	36,024,241	21,853,312
Discount on Issuance of Securities (-)	78,709	30,528
Bond Interest Accrual	1,338,772	1,130,476
Total	37,284,304	22,953,260

- In October 2016, the Bank issued bonds amounting USD 500 million (TL 6,593,250). The bond is subject to annual fixed interest payment of 5.375% every six months and the total maturity is seven years.
- In September 2017, the Bank issued bonds amounting USD 500 million (TL 6,593,250). The bond is subject to annual fixed interest payment of 4.250% every six months and the total maturity is five years.
- In May 2018, the Bank issued bonds amounting USD 500 million (TL 6,593,250). The bond is subject to annual fixed interest payment of 6.125% every six months and the total maturity is six years.
- In January 2019, the Bank issued bonds amounting USD 500 million (TL 6,593,250). The bond is subject to annual fixed interest payment of 8.250% every six months and the total maturity is five years.
- In June 2021, the Bank issued a bond with a maturity of five years and a fixed rate of 5,750% amounting to USD 750 million (9.889.875 TL).
- Also the Bank applied hedge accounting for the measurement of derivative financial instruments which are related to the bonds issued and accounted for hedge accounting during this period.
- The Bank also borrowed EUR 150 Million (2,235.705 TL), which will be included in the additional Tier 1 capital calculation as of April 2019.

	31 December 2021	31 December 2020
Opening Balance	22,953,260	18,791,531
Proceeds during the year	6,501,600	-
Repayments during the year	(3,783,347)	=
Other non-cash movements	11,612,791	4,161,729
Total debt securities securities	37,284,304	22,953,260

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

16 SUBORDINATED LIABILITIES

	31 December 2021	31 December 2020
(*)	2 000 125	2 000 120
Subordinated debt instruments (*)	2,999,127	2,998,128
Subordinated loans (**)	2,524,710	1,465,448
Total	5,523,837	4,463,576

^(*) In September 2018, the Bank issued subordinated debt instrument amounting TL 2,901,759 with a maturity of ten years and fixed rate of 12.54% with an early redeem option after fifth year of the date of issue. Subordinated loan includes interest expense on debt securities issued amounting to TL 97,368 (31 December 2020: TL 96,369).

Changes in liabilities arising from financing activities are as follows;

	Funds Borrowed	Debt Securities Issued	Subordinated Loans
Opening Balances	160,095,708	22,953,260	4,463,576
Cash Flow Items:			
Issuance/Borrowed	251,342,287	6,501,600	-
Repayment	269,432,694	3,783,347	-
Non-cash flow items			
Movement in Accrual	101,842	208,296	182,236
Movement in Price Diff	-	(48,181)	-
FX Differences	106,675,695	11,452,676	878,025
Commission Movement	(791,268)	-	-
CBRT Upfront Mov	(356,839)	-	-
Ending Balances	249,217,267	37,284,304	5,523,837

17 TAXATION

According to Act number 3332 and article 4/b of Act number 3659, dated 25 March 1987 and 26 September 1990, respectively, the Bank is exempt from Corporate Tax. Due to the 3rd Article of the same act; the above-mentioned exemption became valid from 1 January 1988. In accordance with clause 9 of the Provisional Article 1 of Corporate Tax Law No. 5520, which states "The provision of Article 35 shall not apply to exemptions, allowances and deductions included in other laws in relation to Corporation Tax prior to the effective date of the Law No. 5520", the exemption from Corporation Tax continues. Accordingly, current and deferred taxes are not recognized in these financial statements.

^(**) It also includes Tier II capital amounting EUR 150 million (TL 2,235,705) and interest expense of EUR 19,390 (TL 289,005).

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

18 OTHER LIABILITIES AND PROVISIONS

The principal components of other liabilities are as follows:

	31 December 2021	31 December 2020
Financial liabilities		
Guarantees received ⁽¹⁾	2,472,847	1,181,327
Unearned revenue	35,265	12,617
Tax liability	12,995	17,700
Positive price difference on bonds issued	<u>-</u>	-
Funds	246,796	13
Other ⁽³⁾	3,371,004	347,030
Non-financial liabilities		
Insurance technical provisions	343,920	160,393
Dividend pay liabilities	88,103	56,500
BRSA expense provision	107,120	51,181
Vacation pay liability ⁽²⁾	18,002	15,996
Other	297,600	105,984
	6,993,652	1,948,741

Guarantees received refers to cash guarantees obtained in relation to Rediscount Credits, which have increased in line with the increase in the amount of Rediscount Credits.

19 RETIREMENT BENEFIT OBLIGATIONS

As a result of IAS 19 (2011), the Bank started to recognize all actuarial gains and losses immediately in other comprehensive income in accordance with the change in IAS 19 (2011).

As of 31 December 2021 actuarial gains/losses amounting to TL 662 related to the reserve for employee termination benefits shown under equity and the current service cost and interest expense amounting to TL 7,202 are realized in the comprehensive income statement in accordance with the change in the IAS 19 (2011) standard.

IAS 19 (2011) "Employment Benefits" requires actuarial valuation methods to be developed to estimate the enterprise's obligation for such benefits. Accordingly, the following actuarial assumptions were used in the calculation of the total liability as at 31 December 2021 and 31 December 2020.

	31 December 2021	31 December 2020
Discount rate (%)	23.00	12.5
Inflation rate (%)	18.50	8.8

Movement in the reserve for employment termination benefits for the period ended 31 December 2021 and 31 December 2020 are as follows:

	31 December 2021	31 December 2020
1 January	26,332	30,076
Current service cost	3,910	3,484
Interest expense	3,292	2,589
Actuarial gains	662	(206)
Payments during the period	(372)	(9,612)
Total	33,824	26,331

TL 2,062 of vacation pay liability provision is provided during 2021 (31 December 2020: TL 51).

⁽³⁾ It consists of the balance sent by the Ministry of Treasury and Finance for capital increase.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

20 SHARE CAPITAL

The historical paid in share capital of the Bank is TL 10,800,000 (31 December 2020: TL 9,270,000) and consists of 10.8 billion (31 December 2020: 9,27 billion) authorised shares with a nominal value of TL 1 each.

Increase date	Increase amount	Cash	Profit reserves used for increase	Capital reserves used for increase
21 December 2021	1,530,000	100,000	1,430,000	-

The Bank has decided to use the capital stock system that is registered in the Bank in the extraordinary general meeting that took place on 27 January 2017. The decision has been submitted to the trade register and has been published on Turkey Trade Registry Gazette on 30 January 2017, Numbered 9252.

	31 December 2021	31 December 2020
Share capital - historical cost	10,800,000	9,270,000
Adjustment to share capital	38,091	38,091
Total paid in share capital	10,838,091	9,308,091

The Bank is fully owned by the Turkish Treasury.

The adjustment to share capital represents the restatement effect of cash and cash equivalent contributions to share capital in terms of equivalent purchasing power at 31 December 2005 after elimination of the accumulated deficit. There are no other reserves at 31 December 2021 (31 December 2020: None).

The legal reserves amounting to TL 569,768 (31 December 2020: TL 494,199) consist of first and second legal reserves in accordance with the Turkish Commercial Code. The first legal reserve is appropriated out of the statutory profits at the rate of 5%, until the total reserve reaches a maximum of 20% of the entity's share capital. The second legal reserve is appropriated at the rate of 10% of all distributions in excess of 5% of the entity's share capital. The first and second legal reserves are not available for distribution unless they exceed 50% of the share capital but may be used to absorb losses in the event that the general reserve is exhausted.

Retained earnings as per the statutory financial statements other than legal reserves are available for distribution, subject to the legal reserve requirement referred to below.

Under the Turkish Commercial Code and in accordance with the Articles of Association of the Bank, the Bank is required to create the following legal reserves from appropriations of earnings, which are available for distribution only in the event of liquidation or losses:

- a) First legal reserve, appropriated at the rate of 5% of net income, until the total reserve is equal to 20% of issued and fully paid-in share capital.
- b) Second legal reserve, appropriated at the rate of 10% of the distribution of second dividend, in excess of the first legal reserve, appropriated at a rate of 5% and first dividend, appropriated at a rate of 8%.

Fair value reserve

The fair value reserve includes the cumulative net change in the fair value of financial assets measured at fair value through other comprehensive income until the investment is derecognized or impaired.

As at 31 December 2021, such gains / (losses) recognised under equity in fair value reserves amounted to TL 6,856 (31 December 2020: TL 116,279).

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

21 NET INTEREST INCOME

	1 January – 31 December 2021	1 January – 31 December 2020
Interest income:		
Interest on loans and advances	6,009,864	4,229,188
Interest on deposits with banks	261,088	126,794
Interest on financial assets measured at amortized cost	693,947	525,940
Interest on interbank money market placements	128,648	72,387
Interest on financial assets measured at fair value		
through profit or loss	10,701	20,614
Interest on financial assets measured at fair value	·	
through other comprehensive income	83,086	25,163
Other interest income	3,405	11,413
Total interest income	7,190,739	5,011,499
Interest expense:		
Interest on funds borrowed	(2,212,652)	(2,084,517)
Interest on debt securities in issue	(2,076,959)	(1,682,468)
Other interest expenses	(98,819)	(21,569)
Total interest expense	(4,388,430)	(3,788,554)
Net interest income	2,802,309	1,222,945

22 FOREIGN EXCHANGE GAINS AND LOSSES

	1 January – 31 December 2021	1 January – 31 December 2020
Foreign exchange gains	149,992,661	83,400,854
Foreign exchange losses	(151,372,833)	(81,016,197)
Net foreign exchange gains/(losses)	(1,380,172)	2,384,657

23 GAINS AND LOSSES ON FINANCIAL ASSETS MEASURED AT FAIR VALUE THROUGH PROFIT OR LOSS

1 January – 31 December 2021	1 January – 31 December 2020
3,564,554	1,627,465
4,451	(3,177,283) 10,003
	(1,539,815)
	31 December 2021 3,564,554 (1,545,407)

^(*) Derivative income/expense include fair value hedge valuation differences amounting TL (2,361,282) (31 December 2020: TL 963,492).

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

24 OTHER OPERATING INCOME

	1 January – 31 December 2021	1 January – 31 December 2020
Released reserves	9,186	3,311
Rent income	1,708	1,367
Sale of assets	110	-
Other (*)	17,679	10,088
Total	28,683	14,766

^(*) The related amount consists of real estate rental income, personnel disability income, adjustments to previous years' expenses and other transactions within the scope of IAS 40.

25 OPERATING EXPENSES

	1 January – 31 December 2021	1 January – 31 December 2020
Demonstration of the second	(200 ((1)	(260.966)
Personnel expenses	(300,661)	(260,866)
BRSA contribution expense	(96,785)	(51,181)
KOSGEB fee (*)	-	(30,845)
Taxes and duties expenses	(36,243)	(25,156)
Depreciation and amortization charges	(12,133)	(10,602)
Premiums paid to reinsurance companies	-	(29)
Employment termination benefits and unused vacation	(8,892)	(51)
Rent expenses	(656)	-
Research expenses	-	-
Other	(208,840)	(47,471)
Total	(664,210)	(426,201)

^(*) As more than 50% of the Bank's paid-in share capital is owned by government entities, the Bank is obliged to pay an annual fee at a rate of 2% of its corporate tax base to Small and Medium Industries Development Organization ("KOSGEB") in accordance with the establishment law of KOSGEB. According to the law no. 7341, the bank has been exempted from the kosgep amount. And the amount has been reversed.

26 COMMITMENTS AND CONTINGENT LIABILITIES

In the normal course of its banking activities, the Bank undertakes various commitments and incurs certain contingent liabilities that are not presented in the balance sheets, including letters of guarantee, other guarantees and off-balance sheet derivative instruments. The management does not expect any material losses as a result of these transactions. The following is a summary of significant commitments and contingent liabilities:

Legal proceedings

As of 31 December 2021, there are legal proceedings outstanding against the Bank amounting to TL 7,971, USD 7,460, EUR 1,098 thousand and GBP 165 thousand. In addition, there are legal proceedings outstanding filed by the Bank. These legal proceedings amounting to TL 275,268, USD 41,053, EUR 7,895 thousand and GBP 29 thousand.

The Bank has allocated provisions amounting to TL 24,036 (31 December 2020: 14,035) for these legal proceedings. A number of the outstanding litigation cases in Turkish courts relate to employee bonus payments.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

26 COMMITMENTS AND CONTINGENT LIABILITIES (continued)

Commitments under derivative instruments:

The breakdown of swap transactions at 31 December 2021 and 31 December 2020 is as follows:

		31 December	2021	31 December	2020
	Currency	Foreign currency amount	TL	Foreign currency amount	TL
Transaction type	currency	winount		umo um	
Interest rate swap purchases	USD	500,000	6,593,250	1,000,000	7,364,700
interest rate swap purchases	EUR	-	-	-	7,304,700
Foreign currency swap purchases	USD	198,623	2,619,142	334,525	2,463,673
	TL	-	-	172,345	172,345
	GBP	-	-	1,150	11,560
	EUR	-	-	-	-
Foreign currency forward purchases	USD	-	-	2,741	20,187
	TL	-	-	21,814	21,814
	GBP	-	-	260	2,613
	EUR	-	-	-	-
Cross currency swaps purchases	USD	2,066,262	27,246,761	2,653,743	19,544,022
	JPY	-	-	-	-
	EUR	-	-	-	-
Option purchases	TL	-	-	-	-
	EUR	-	-	-	-
	USD	-	-	-	-
Total purchases			36,459,153		29,600,914
Interest rate swap sales	USD	500,000	6,593,250	1,000,000	7,364,700
interest rate swap sales	EUR	500,000	0,393,230	1,000,000	7,304,700
г.	EUD	160 604	2.512.006	226 821	2.052.005
Foreign currency swap sales	EUR GBP	168,604 3,500	2,512,996 62,334	226,821 4,500	2,053,005 45,234
	JPY	3,300 114	1,308	10,322	737
	TL	114	1,506	490,869	490,869
	USD	-	-	20,000	147,294
Foreign currency forward sales	TL			24,538	24,538
Totalgh currency for ward sales	USD	_	_	2,741	20,187
	EUR	-	-	2,711	20,107
Cross currency swaps sales	TL	_	_	_	
Cross currency swaps sales	EUR	1,795,230	26,757,362	2,285,201	20,683,815
	JPY	1,775,250	20,757,502	2,203,201	20,003,013
	USD	-	-	-	-
Option sales	TL	_	_	_	_
-F	EUR	-	-	-	-
	USD	-	-	-	-
Total sales			35,927,250		30,830,379
			, ,		,
Total			72,386,403		60,431,293

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

26 COMMITMENTS AND CONTINGENT LIABILITIES (continued)

Maturity analysis of swap and forward transactions are as follows:

		31 D	ecember 2021		
	Up to 3	3 months	1 year to 5	Over 5	
	months	to 1 year	years	years	Total
Interest rate swap purchases	-	_	6,593,250	-	6,593,250
Foreign currency swap purchases	2,619,142	-	-	-	2,619,142
Forward foreign currency purchases	-	-	-	-	-
Cross currency swaps purchases	4,615,275	6,593,250	10,118,720	5,919,516	27,246,761
Option purchases	-	-	-	-	-
Total purchases	7,234,417	6,593,250	16,711,970	5,919,516	36,459,153
Interest rate swap sales	-	-	6,593,250	-	6,593,250
Foreign currency swap sales	2,576,638	-	-	-	2,576,638
Forward foreign currency sales	-	-	-	-	-
Cross currency swaps sales	4,583,644	6,232,625	9,958,944	5,982,149	26,757,362
Option sales	-	-	-	-	-
Total sales	7,160,282	6,232,625	16,552,194	5,982,149	35,927,250
			December 2020		
	Up to 3	3 months	1 year to 5	Over 5	
	months	to 1 year	years	years	Total
Interest rate swap purchases	3,682,350	_	3,682,350	_	7,364,700
Foreign currency swap purchases	1,553,921	1,093,657	-	_	2,647,578
Forward foreign currency purchases	22,180	22,434	-	_	44,614
Cross currency swaps purchases	-	3,682,350	11,415,285	4,446,387	19,544,022
Option purchases	_	_	-	_	· · · · · -
		4.700.444	45.005.605	4.444.00=	•• <•• • • •

29,600,914 **Total purchases** 5,258,451 4,798,441 15,097,635 4,446,387 Interest rate swap sales 3,682,350 3,682,350 7,364,700 Foreign currency swap sales 1,541,885 1,195,254 2,737,139 Forward foreign currency sales 22,310 22,415 44,725 Cross currency swaps sales 3,716,209 12,060,159 4,907,447 20,683,815 Option sales **Total sales** 5,246,545 4,933,878 15,742,509 4,907,447 30,830,379

The above tables summarize the Bank's derivative transactions that will be settled on a net basis into relevant maturity groupings based on the remaining period at the balance sheet date, in respective currencies. Accordingly, the difference between the "sale" and "purchase" transactions represents the net exposure of the Bank with respect to commitments arising from these transactions.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

26 COMMITMENTS AND CONTINGENT LIABILITIES (continued)

Credit related commitments:

Letters of guarantee, which represent irrevocable assurances that the Bank will make payments in the event that a customer cannot meet its obligations to third parties, carry the same credit risk as loans. Cash requirements under these guarantees are considerably less than the amount of the commitment because the Bank does not generally expect the third party to draw funds under the agreement.

The total outstanding contractual amount of commitments to extend credit does not necessarily represent future cash requirements, since many of these commitments will expire or terminate without being funded.

The following table shows the outstanding credit related commitments of the Bank at 31 December 2021 and 31 December 2020:

	31 December 2021	31 December 2020
Financial guarantees		
Letters of Guarantee	114.634	11,040
Other guarantees	,	,
-Foreign currency	25,161,299	11,979,838
Total financial guarantees	25,275,933	11,990,878

The Bank provides collateral against commercial and political risks for exported product prices of exporters by export loan insurance programs.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

27 SEGMENT ANALYSIS

The main segments of the Bank are corporate banking and investment banking. Investment banking includes the treasury operations of the Bank whereas corporate banking includes all operations other than treasury (mainly all loan operations). The analysis below has been prepared in accordance with the reporting made to the chief operating decision maker, the Assistant General Manager of Finance.

31 December 2021	Corporate banking	Investment banking	Unallocated	Total
31 December 2021	Danking	Dalikilig	Unanocateu	Total
Segment revenue	6,922,073	3,200,915	44,399	10,167,387
Segment expenses	(2,926,395)	(2,122,742)	(2,011,733)	(7,060,870)
Net profit	3,995,678	1,078,173	(1,967,334)	3,106,517
Interest income	6,013,269	1,177,470	-	7,190,739
Interest expense	(2,309,811)	(2,077,074)	(1,545)	(4,388,430)
Depreciation and amortization	-	-	(12,133)	(12,133)
Impairment charges on loans	(161,447)	267	26,990	(134,190)
Total segment assets	286,483,564	32,545,623	1,209,469	320,238,656
	240 247 247	40.005.000	5 4 4 4 4 5 2	207 (07 712
Segment liabilities	249,217,267	49,325,822	7,144,453	305,687,542
Equity	-	80,295	14,470,819	14,551,114
Total liabilities and equity	249,217,267	49,406,117	21,615,272	320,238,656
	Corporate	Investment		
31 December 2020	banking	banking	Unallocated	Total
Segment revenue	4,799,247	770,987	2,414,743	7,984,977
Segment expenses	(2,776,510)	(3,265,193)	(431,886)	(6,473,589)
Net profit	2,022,737	(2,494,206)	1,982,857	1,511,388
1 tet prom	2,022,101	(2,121,200)	1,702,001	1,011,000
Interest income	4,240,601	770,898	-	5,011,499
Interest expense	(2,103,454)	(1,682,619)	(2,481)	(3,788,554)
Depreciation and amortization			(10,602)	(10,602)
Impairment charges on loans	(368,505)	(959)	(5)	(369,469)
Total segment assets (*)	177 (20 021	22 770 072	1 ((7 577	202 0/9 570
Total segment assets	177,630,921	23,770,072	1,667,577	203,068,570
Segment liabilities	160,095,708	28,792,402	2,766,200	191,654,310
Equity	-	149,296	11,264,964	11,414,260
		1.5,250	11,201,501	11, 11 1,200
Total liabilities and equity (*)	160,095,708	28,941,698	14,031,164	203,068,570

^(*) The indicated information is presented as of December 31, 2020 for balance sheet items.

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

27 SEGMENT ANALYSIS (continued)

Reconciliation of segment results of operations:

- reconcinution of segment results of operations		T		
31 December 2021	Corporate banking	Investment banking	Unallocated	Total
31 December 2021	Danking	Danking	Chanocateu	Total
Interest income	6,013,269	1,177,470	-	7,190,739
Fee and commissions income	902,877	_,,,	21,643	924,520
Gains on financial instruments measured at fair	,		,	,
value profit or loss	-	2,023,245	-	2,023,245
Other operating income	5,927	200	22,756	28,883
Total segment revenue	6,922,073	3,200,915	44,399	10,167,387
21 D 1 2021	Corporate	Investment	TT 11 (1	70. 4 1
31 December 2021	banking	banking	Unallocated	Total
Interest expense	(2,309,811)	(2,077,074)	(1,545)	(4,388,430)
Fee and commissions expense	(455,137)	(33,841)	(4,890)	(493,868)
Impairment charges on loans	(161,447)	267	26,990	(134,190)
Losses on financial instruments measured at fair				
value profit or loss	-	-	(1.200.172)	(1, 200, 172)
Foreign exchange losses	-	(12.004)	(1,380,172)	(1,380,172)
Other operating expenses	-	(12,094)	(652,116)	(664,210)
Total segment expense	(2,926,395)	(2,122,742)	(2,011,733)	(7,060,870)
	Corporate	Investment		
31 December 2020	banking	banking	Unallocated	Total
•	4.2.40.601	77 0 000		5.011.400
Interest income	4,240,601	770,898	17 000	5,011,499
Fee and commissions income Gains on financial instruments measured at fair	556,957	-	17,009	573,966
value profit or loss				
Other operating income	1,689	89	2,397,734	2,399,512
Other operating meome	1,009	6)	2,391,134	2,399,312
Total segment revenue	4,799,247	770,987	2,414,743	7,984,977
	, ,	,	, ,	
	Corporate	Investment		
31 December 2020	banking	banking	Unallocated	Total
•	(0.005.717)	/4 4#5 045	(C. C. T. T.	(0. 5. 140.0)
Interest expense	(2,285,542)	(1,453,043)	(3,024)	(3,741,609)
Fee and commissions expense	(221,124)	(31,099)	(1,101)	(253,324)
Impairment charges on loans	(131,863)	(1,134)	(422)	(133,419)
Losses on financial instruments measured at fair				
value profit or loss	-	-	(506.272)	(506.272)
Foreign exchange losses	-	-	(506,373)	(506,373)
Other operating expenses	-	-	(359,546)	(359,546)
Total segment expense	(2,638,529)	(1,485,276)	(870,466)	(4,994,271)

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

28 RELATED PARTIES

Parties are considered as related if one party can control the other party, is under common control or can exercise significant influence over the other party in making financial or operational decisions. For the purpose of this financial information the shareholders of the Bank together with state-controlled entities in Turkey are considered and referred to as related parties. Other related parties refer to entities controlled, jointly controlled or having significance influence by the Turkish Government.

A number of banking transactions were entered into with related parties in the normal course of business.

(a) Balances with related parties:

	31 December 2021	31 December 2020
Due from banks:		
- Other related parties (1)	15,662,220	10,123,457
Loans and advances:		
- Other related parties (2)	6,542,126	4,490,861
Investment securities ("FV through P/L")		
- Shareholder (3)	123,842	74,891
Investment securities ("FV through OCI")		
- Shareholder ⁽⁴⁾	1,391,467	668,849
Investment securities ("Held to maturity")		
- Shareholder (5)	9,955,982	10,637,542
Funds borrowed		
- Other related parties (6)	172,501,484	119,971,167
Other liabilities		
- Other related parties	180,548	20,340

⁽¹⁾ Average interest rate for due from banks for TL is 15.25% (31 December 2020: 1.06% for FX and 19.25% for TL)

(b) Transactions with related parties:

	31 December 2021	31 December 2020
Interest income on investment securities:		
- Shareholder	756,503	534,297
Interest income on loans and advances:		
- Other related parties	299,760	233,203
Interest expense on funds borrowed:		
- Other related parties	1,320,791	882,420
Operating expenses (taxes paid)		
-Other related parties	36,243	25,156

(c) Remuneration of key management personnel:

	31 December 2021	31 December 2020	
Salaries and other short-term employee benefits	8,980	5,316	

⁽²⁾ Average interest rate for loans and advances for FX and TL are respectively 2,83% and 15,88% (31 December 2020: 2.78% for FX and 10.8% for TL)

⁽³⁾ Average interest rate for investment securities (FV through P/L) for FX is 4,25% (31 December 2020: 5,67%)

⁽⁴⁾ Average interest rate for investment securities (FV through OCI) for FX is 6,54% (31 December 2020: 6,61%) and for TL is 8,50%

⁽⁵⁾ Average interest rate for investment securities (Held to maturity) for FX and TL are respectively 4,99% and 9.80% (31 December 2020: 2.33% for FX and 9.82% for TL)

⁽⁶⁾ Average interest rate for funds borrowed for FX and TL are respectively 0.20% and 11,21% (31 December 2020: 0.30% for FX and 9.02% for TL)

NOTES TO THE FINANCIAL STATEMENTS AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL"), unless otherwise indicated).

29 EVENTS AFTER THE REPORTING PERIOD

None.