

**Capital and Risk Management  
Pillar III Disclosures**

**2024**

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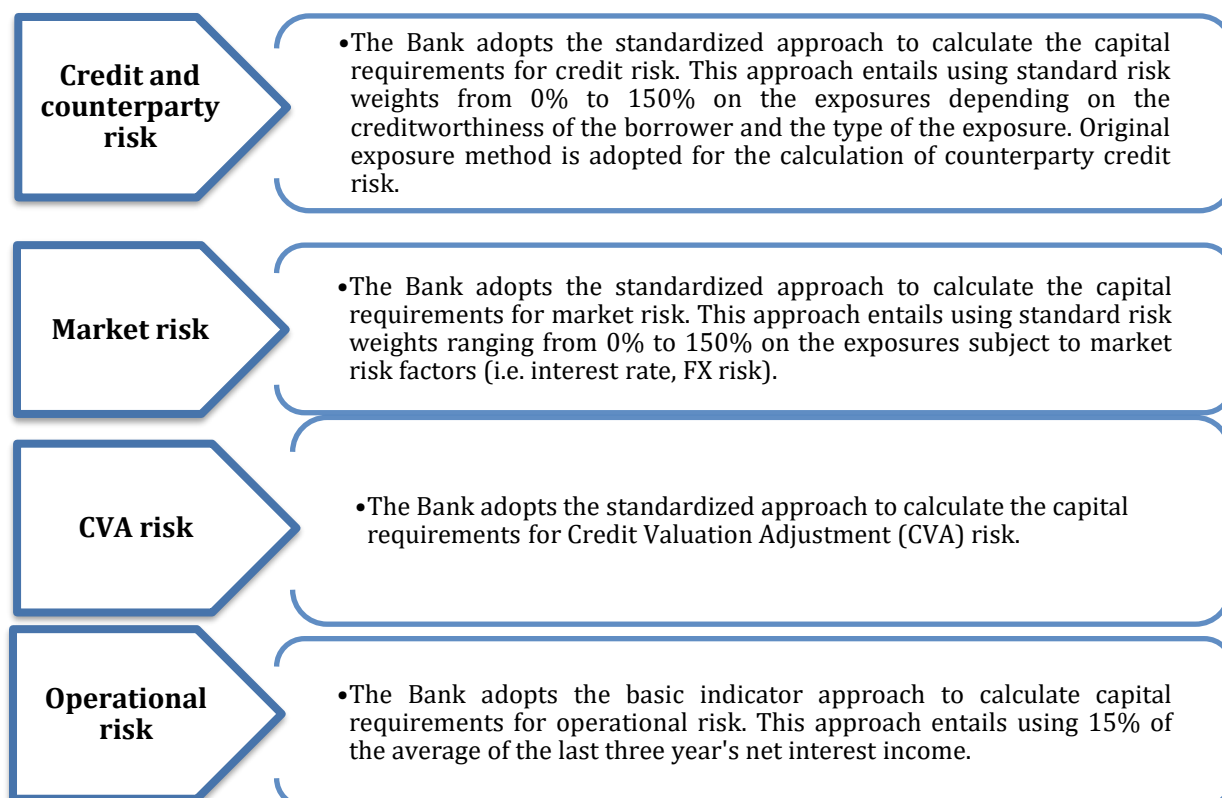
# Introduction

Capital and Risk Management Pillar III Disclosures document contains information that enables an assessment of the risk profile and capital adequacy of Anadolubank Nederland N.V. (hereafter referred to as Anadolubank or the “Bank”). This publication fulfils the requirements of the Basel framework, as stipulated in the Capital Requirements Regulation and Directive and should be read in conjunction with the Annual Report of the Bank.

The applicable guidelines contain three pillars:

- Pillar I: Minimum requirements for capital adequacy
- Pillar II: Assessment of overall capital adequacy, liquidity adequacy and supervisory review and evaluation process (SREP)
- Pillar III: Requirements for disclosure of financial information

**Pillar I** covers the regulatory minimum capital requirements for certain risks. The overall basis of the calculation is the sum of capital requirements for credit and counterparty credit risk, market risk, credit valuation adjustment and operational risk. Pillar I allows banks to apply alternative methods of calculation. Some of these methods require prior approval from De Nederlandsche Bank/the Dutch Central Bank (DNB). Anadolubank applies the following methods for measuring minimum capital requirements under the applicable regulations.



**Pillar II** defines the requirements for the Banks' own processes for assessing risk and capital adequacy through an Internal Capital Adequacy Assessment Process (ICAAP). In addition to ICAAP, the Bank has Internal Liquidity Adequacy Assessment Process (ILAAP) in place. Pillar II also provides guidelines for the supervisory review and evaluation process which takes both ICAAP and ILAAP into consideration.

**Pillar III** defines the requirements for the disclosure of financial and non-financial information. The purpose of the requirements for disclosure of information is to ensure that market participants can evaluate the institutions' risk levels in different areas, their management and control as well as the institution's capitalization with subject to the measured risks.

### **Verification**

The Bank's Pillar III Disclosures are not subject to external audit, thus the document has been verified internally in accordance with the Bank's financial reporting and governance processes. Controls comparable to those for the Annual Report have been applied in accordance with International Financial Reporting Standards (IFRS) as adopted by the European Union (EU) and the legal requirements for the annual accounts of Banks contained in the Netherlands Civil Code. The Pillar III disclosures are prepared for the Bank on non-consolidated basis. The Annual Report contains more detailed information on the accounting policies adopted by the Bank.

### **Frequency**

The Pillar III disclosures are published annually on the Banks' official website ([www.anadolubank.nl](http://www.anadolubank.nl)).

### **Functional and presentation of currency**

The financial statements are presented in Euros, which is the Bank's functional and presentation currency.

# Risk governance

Risk management principles are designed and complied in order to achieve sound governance. Risk management policies and framework are approved by the Management Board and also Supervisory Board of the Bank.

## Risk and capital management

To ensure an effective and appropriate process for risk management and capital management, the Bank applies a framework of 10 components:

### 1. Strategic targets

Risk appetite and the respective capital management is based on strategic targets which are included in the Bank's business and budget plan.

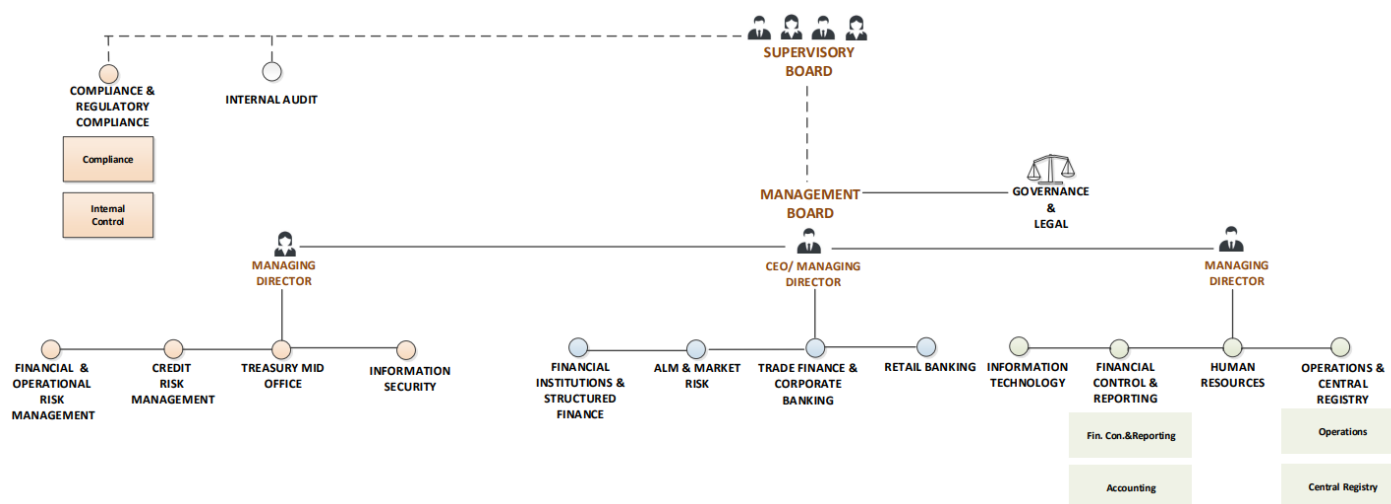
### 2. Organizational culture

In the process of risk and capital management, organizational culture is the foundation upon which the other elements are based. The organizational culture includes management model and human resources in the organization with their individual characteristics, such as integrity, ethical values and attitudes. A clear set of values and ethical guidelines that should be well known throughout the organization are in place.

### 3. Organization

The Bank has a two tier management system, the Management Board (MB) who is responsible for the day-to-day management of the Bank and the Supervisory Board (SB) who is responsible for the supervision of the Bank. The Supervisory and Management Boards have set policy-level standards in accordance with the regulations of the Dutch Central Bank and the guidelines published by the Basel Committee and the European Banking Authority.

The table below shows the organization chart.



The responsibility for the risk management is distributed as follows:

The risk management in the Bank is based on the three lines of defense principles for segregation of duties. Business units being the first line of defense function, Financial & Operational Risk Management, Credit Risk Management, Treasury Mid-Office, Internal Control and Compliance departments form the second line of defense. Those departments support the business units in their decision-making, but have also appropriate independence and countervailing power to avoid risk concentrations. The Internal Audit Department, as the third line of defense, oversees and assesses the functioning and effectiveness of the first two lines.

Within Anadolubank, several parties play a role in managing and maintaining ICAAP and ILAAP. This mainly concerns the Supervisory Board, the Management Board, Credit Committee (CC) and the Asset & Liability Committee (ALCO).

In general, management of ICAAP and ILAAP is performed by the Management Board with the support and guidance of the relevant committees, whereas the Supervisory Board ratifies and reviews their proposals and decisions.

#### 4. Risk identification

Risk identification is an important part of the strategy and budget planning processes. The risks are identified and analyzed with respect to the possible adverse events. Credit, market, operational, credit concentration, interest rate (banking book), liquidity, compliance and IT related risks are measured in terms of the additional capital requirement. These measurements are based on to adequate methods.

#### 5. Risk analysis and stress tests

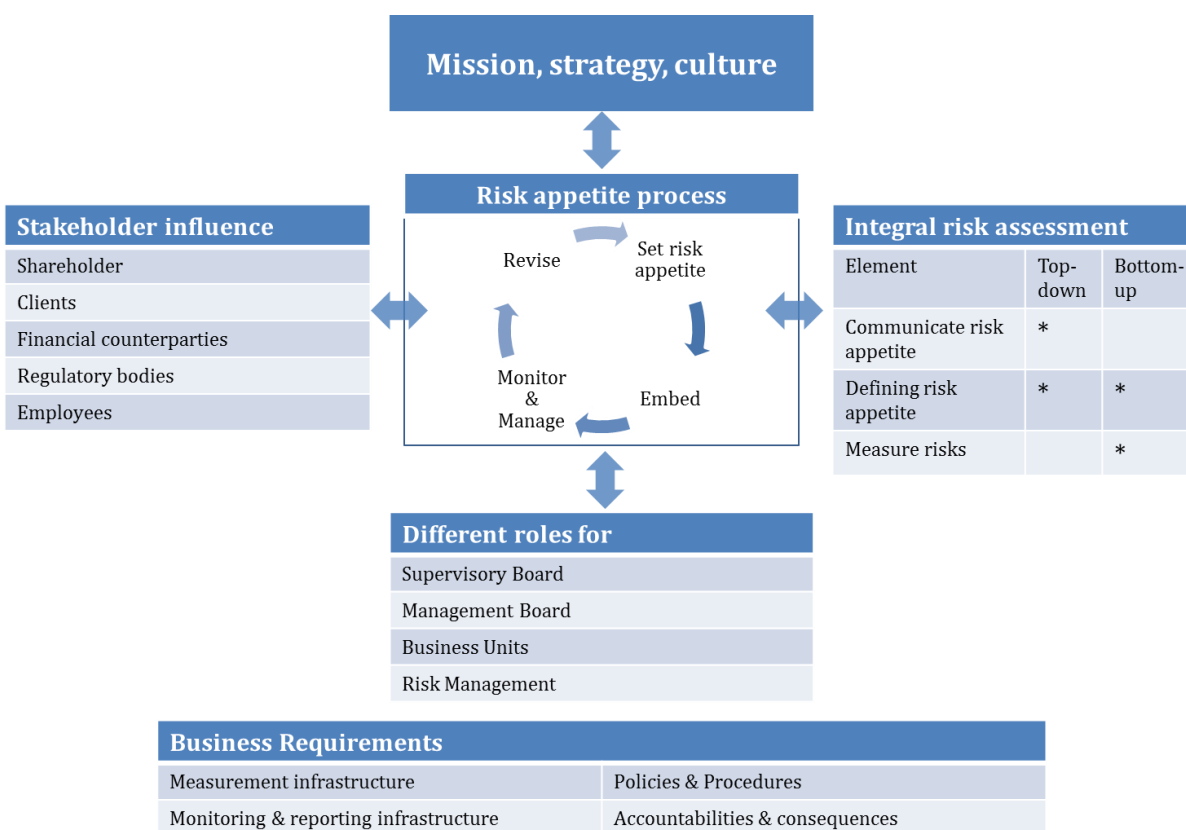
The risk analysis forms the basis for how the Bank measures and manages risks. All major risk categories are assigned with a risk profile as part of the Bank's ICAAP and ILAAP. The stress test is an important tool for analyzing the impact of adverse events on the Bank's financial performance, balance sheet, capital and liquidity adequacy. Both the stress tests and scenario analyses are used to assess the impact of the potential adverse market and bank specific events.

#### 6. Risk appetite and risk strategies

The risk appetite framework sets the boundaries which are safe to operate. It is set and reviewed by an annual process reflected in the below schema:

Anadolubank's vision is 'to be the preferred partner for our clients'. The objective of the Business Plan is expressed in the following four components:

- **Earnings:** Delivering sustainable profitability based on long-term relationship with customers that create value for both parties.
- **Capital:** Preserving a strong capital by enforcing effective and prudent capital management.
- **Liquidity:** Ensuring a strong and stable liquidity position also for stressed environments to fulfill financial requirements/obligations.
- **Reputation:** Establishing a long-term relationship with customers by providing high quality and tailor made services and products based on the values.



## 7. Risk and capital management

Sound risk management is an important instrument to achieve the Bank's goals. The aim of risk management is to be an integrated part of its planning, strategy, decision-making and monitoring processes. The Bank shall have a capital management process that ensures:

- An effective capital acquisition and optimal capital usage in relation to the Bank's strategic target and business strategies;
- A satisfactory capital adequacy based on chosen risk/return profile;
- Utilizing growth opportunities in the targeted markets while absorbing the impacts of the unexpected losses.

## 8. Reporting, monitoring and surveillance

All employees are responsible for the ongoing management of risks in their own areas. The Financial & Operational Risk Management Department performs an independent assessment of the overall risk exposure and trends through periodical reports to the SB and MB in addition to ICAAP and ILAAP.

## 9. Contingency plans

Contingency plans (Business Continuity Plan (BCP), Contingency Funding Plan (CFP) and Recovery Plan (RP)) are prepared to address the Bank's operational, liquidity and capital challenges and the potential action plans during unexpected events/crises.

- Business Continuity Plan outlines the processes and procedures necessary to recover and continue critical business processes in the event of a service interruption or major disaster.

The test of the plan is organized annually for the consistency of the defined plans since the probability of an actual interruption is low compared to the financial events.

- The Contingency Funding Plan outlines the potential action plans to recover from a liquidity related crisis.
- The Recovery Plan outlines the potential action plans to recover from a solvency and/or liquidity related crisis.

## **10. Compliance**

The Bank consistently promotes integrity within the organization to strengthen its compliance with internal rules, laws and regulations. The Compliance department is embedded within the Compliance & Internal Control Department, which directly reports to the Management Board and to the Supervisory Board via the head of department. The Systematic Integrity Risk Assessment (SIRA), CDD (customer due diligence), TM (transactions monitoring) and reporting will continue to be at the top of agenda of Compliance while the knowledge of staff will be kept updated with trainings.



# Credit and counterparty credit risk

## Credit risk

Credit risk arises principally from loans and advances to customers and from investments in debt securities, but also from commitments, guarantees, documentary credits and counterparty credit risk in derivatives contracts.

The Bank's asset portfolio is managed in accordance with the Credit Risk Policy, which applies qualitative and quantitative guidelines, with particular emphasis on avoiding excessive concentrations of risk.

The Bank's credit risk exposure consists of on-balance and off-balance sheet exposures. The on-balance sheet exposure is the book value of assets whereas the off-balance sheet exposure represents the amount that the Bank has committed to customers. At the end of 2024, total credit risk exposure was EUR 1,095 million (2023: EUR 984 million). Loans which have the largest share in the total credit exposure increased in 2024 compared to previous year. The share of securities portfolio slightly decreased.

(000 EUR)	Amount		Share	
	Dec-23	Dec-24	Dec-23	Dec-24
<b>Breakdown by asset item</b>				
Cash and balances with Central Bank	282,509	240,132	29%	22%
Banks	11,057	24,336	1%	2%
Loans	566,559	708,077	58%	65%
Securities	123,763	122,937	13%	11%
<b>Total exposure</b>	<b>983,887</b>	<b>1,095,484</b>	<b>100%</b>	<b>100%</b>

## Management and policy

The credit risk management is based on active monitoring by the Management Board, Credit Risk Department, Credit Committees and the relevant business units. The Bank manages credit risk according to its Risk Appetite Framework and Credit Risk Policy which are approved by the Supervisory Board as well as detailed lending rules prepared by the Management Board. The Risk Appetite Framework and Credit Risk Policy impose limits on several exposures such as large exposures to individual borrowers or groups of borrowers, concentration of risk, credit quality of borrowers and exposures to certain sectors and countries. The Management Board ensures that the Credit Risk Policy is reflected in the Bank's internal framework of regulation and guidelines. The Bank's executives are responsible for the business units to execute the Credit Risk Policy appropriately as the Management Board is responsible for the oversight of the process as a whole.

The key credit risk indicators are reported on a regular basis. Trends and performance versus specified benchmarks for credit risk are regularly reported to the Management Board and also related departments. Credit limits are prudent and the Bank uses standard mitigation and credit control approaches.

Business units are responsible for day-to-day management of existing credit exposures, and also for periodic review of the client and related risks, within the framework developed and maintained by

the Credit Risk Department. The Audit Department carries out separate assessment on the processes of the business units, to provide an independent opinion on the adherence to credit policies and procedures. These measures, collectively, constitute the three lines of defense for an effective and prudent risk management for the Bank.

The Credit Risk Department is responsible for developing, enhancing and communicating an effective and consistent credit risk management framework across the Bank to ensure appropriate credit risk policies are in place to identify, measure, control and monitor such risks. Client reviews are conducted at least once a year with updated information on the customer's financial position, market position, industry and economic condition and account conduct. Required actions are taken proactively when the accounts show signs of credit deterioration.

Interdependencies arise when a number of counterparties are engaged in similar business activities or activities in the same geographic region or have similar economic structures that would affect their ability to meet contractual obligations if there are changes in economic, political or other macroeconomic environment. In order to avoid concentration of risk and maintain a diversified portfolio, policies and procedures include specific guidelines to focus on country, sector and counterparty/group limits. Identified concentrations of credit risks are monitored and managed accordingly in order to mitigate the risks.

### **Risk mitigation, collateral and other credit enhancements**

The Bank takes a holistic approach when granting credit facilities that are based on credit analysis and assessment of individual files, where the primary basis is set as the repayment capacity of the borrower. As a fundamental principle, the Bank generally does not grant facilities only on the basis of collateral provided. Credit facilities are granted based on the credibility of the borrower, source of repayment and debt service ability.

Nevertheless, collateral is taken whenever it is assumed to mitigate the credit risk. The Credit Risk Policy encourages the use of credit risk mitigation, justified by commercial prudence and good practice as well as capital efficiency. The value of collateral taken is also monitored periodically. The frequency of valuation depends on the type and volatility of the collateral value. Credit Risk Department monitors the market value of collateral and where required, requests additional collateral in accordance with the underlying agreement and monitors the market value of collateral obtained on an ongoing basis. The main types of collateral taken by the Bank include deposits, guarantees from banks and other eligible counterparties, mortgage on real estates and marine vessels, pledge of inventory and assignment of receivables. The amount and type of collateral depends on the counterparty credit risk assessment.

Collateral analysis is disclosed in the Annual Report.

### **Large exposures / single name concentration risk**

The Bank sets prudent exposure limits on large exposure risk related transactions, in accordance with the Bank's overall strategy and policy, capital adequacy and provisions for potential risks, credit risk rating of each group, risk appetite and business opportunities in each counterparty or group of associated counterparties.

## Sector concentration risk

The Bank's loan book is diversified within the financial institutions and industrial sectors. The largest exposures are to the banking sector. The largest corporate (excluding financial intermediation) sectors are basic materials, transport & logistics, and automotive, respectively. The Bank uses an internal industry classification which is based on the NACE (EU classification system) standard.

(000 EUR)	Banks		Loans		Securities		Total	
Breakdown by sector	Dec-23	Dec-24	Dec-23	Dec-24	Dec-23	Dec-24	Dec-23	Dec-24
AGRICULTURE & FISHING	-	-	8,860	6,859	-	-	8,860	6,859
AUTOMOTIVE	-	-	48,409	44,754	-	-	48,409	44,754
BANK	11,057	24,336	285,498	329,338	60,046	63,002	356,601	416,676
BASIC MATERIALS	-	-	71,501	89,651	3,003	3,000	74,504	92,651
BUILDING MATERIALS	-	-	-	7,500	-	-	-	7,500
CAPITAL GOODS	-	-	3,711	-	-	-	3,711	-
CHEMICALS	-	-	5,795	7,249	-	-	5,795	7,249
CONSTRUCTION & INFRASTRUCTURE	-	-	7,600	1,000	-	-	7,600	1,000
CONSUMER PRODUCTS NON-FOOD	-	-	6,200	8,102	-	-	6,200	8,102
FINANCIAL INTERMEDIATION	-	-	27,038	49,400	14,178	11,007	41,216	60,407
FOOD, BEVERAGES & TOBACCO	-	-	3,322	13,322	2,574	2,764	5,896	16,087
GOVERNMENT	-	-	-	-	34,579	38,627	34,579	38,627
HEALTHCARE (INC. SOCIAL WORK)	-	-	-	-	-	-	-	-
OIL & GAS	-	-	15,235	29,973	4,385	4,538	19,620	34,510
OTHERS	-	-	32,750	27,250	-	-	32,750	27,250
PRIVATE INDIVIDUALS	-	-	-	-	-	-	-	-
REAL ESTATE	-	-	10,000	15,000	-	-	10,000	15,000
SERVICES	-	-	-	-	-	-	-	-
TECHNOLOGY	-	-	-	-	-	-	-	-
TRANSPORT & LOGISTICS	-	-	40,640	78,680	4,998	-	45,638	78,680
UTILITIES	-	-	-	-	-	-	-	-
<b>Total exposure</b>	<b>11,057</b>	<b>24,336</b>	<b>566,559</b>	<b>708,077</b>	<b>123,763</b>	<b>122,937</b>	<b>701,378</b>	<b>855,351</b>

Breakdown by the sector for the assets is also provided in the Annual Report.

## Country concentration risk

Country risk is defined as the bank's aggregate exposure to a country. The exposures classified under country risk include all cross-border exposures to any counterparty in the relevant country as well as all sovereign exposures of the relevant country. The Bank adopted the "Policy Rule on Country Concentration" established by the DNB which prescribes Pillar II calculation for credit concentration risk. In addition, a separate country risk policy has been in force for the management of those exposures.

On top of that, the Bank closely monitors its exposures and limits, total loans granted to the counterparties established in a specific country, for an effective monitoring of the collective debtor and foreign currency convertibility risk in a specific country.

The geographical breakdown of assets is also disclosed in the Annual Report.

(000 EUR)	Banks		Loans		Securities		Total	
Breakdown by geography	Dec-23	Dec-24	Dec-23	Dec-24	Dec-23	Dec-24	Dec-23	Dec-24
EU MEMBER STATES	3,282	18,773	223,295	254,793	104,167	108,126	330,744	381,692
TURKEY	238	303	280,915	402,188	17,022	11,075	298,175	413,566
OTHER COUNTRIES	7,536	5,261	62,349	51,096	2,574	3,737	72,459	60,093
<b>Total exposure</b>	<b>11,057</b>	<b>24,336</b>	<b>566,559</b>	<b>708,077</b>	<b>123,763</b>	<b>122,937</b>	<b>701,378</b>	<b>855,351</b>

## Portfolio credit quality

The Bank places great emphasis on monitoring and reporting the quality of the loan portfolio. To this end, development of credit ratings, defaults, loan impairments and the progress of the recovery of distressed loans (if any) are monitored closely.

The Bank makes use of rating models supported by vendors in order to assign external and/or internal ratings to its customers. All internal ratings are mapped to external rating scales. Below table shows the breakdown of the portfolio by the assigned external ratings.

(000 EUR)	Banks		Loans		Securities		Total	
Breakdown by external rating	Dec-23	Dec-24	Dec-23	Dec-24	Dec-23	Dec-24	Dec-23	Dec-24
AAA to BBB-	10,819	24,034	47,543	26,500	98,068	103,027	156,430	153,561
BB+ to B-	238	303	274,412	346,414	25,695	19,910	300,345	366,626
CCC+ to C	-	-	-	-	-	-	-	-
UNRATED	-	-	244,604	335,164	-	-	244,604	335,164
<b>Total exposure</b>	<b>11,057</b>	<b>24,336</b>	<b>566,559</b>	<b>708,077</b>	<b>123,763</b>	<b>122,937</b>	<b>701,378</b>	<b>855,351</b>

## Defaults and write-downs of loans

The Bank's accounts are prepared in accordance with IFRS. This means that all items in the profit and loss statement and balance sheet, including recognition of receivables and provisioning and losses on loans and credits, follow these principles.

Problematic loans are identified on an event basis (e.g. bad news regarding an obligor) or the result of a regular review (e.g. deteriorated financials and consequently credit rating). In order to properly classify problem loans (defined as any exposure that may have an indication of a (future) problem) Anadolubank reviews its credit risk policy and updates the relevant sections with regard to the latest regulatory guidelines.

Any employee, but particularly front-office and Credit Risk Department employees, have a duty to report any potential event-based trigger for a problem loan. Any problem loan will be brought immediately to the attention of the Management Board by the Credit Risk Department.

Consequently, the front office and Credit Risk Department are mutually responsible for both coordinating all related proceedings (e.g. organizing meetings by inviting all related parties within the Bank and also communications with the obligors) and making its appropriate recommendations to the Management Board respectively. Lawyers can be consulted at any stage about relevant issues by the Bank. The following table presents the evolution of staging within 2024.

(000 EUR)	Stage1			Stage2			Stage3		
31 December 2024	Net carrying	Gross carrying	ECL	Net carrying	Gross carrying	ECL	Net carrying	Gross carrying	ECL
Cash and cash equivalents	259,027	259,027	0	0	0	0	0	0	0
Banks	346,022	346,269	247	0	0	0	0	0	0
Interest-bearing securities	124,421	124,635	214	0	0	0	0	0	0
Loans and advances	379,856	380,748	892	0	0	0	1,230	4,102	2,872
Off-balance sheet liabilities	44,274	44,285	11	0	0	0	0	0	0
<b>Total</b>	<b>1,153,600</b>	<b>1,154,964</b>	<b>1,364</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1,230</b>	<b>4,102</b>	<b>2,872</b>

(000 EUR)	Stage1			Stage2			Stage3		
31 December 2023	Net carrying	Gross carrying	ECL	Net carrying	Gross carrying	ECL	Net carrying	Gross carrying	ECL
Cash and cash equivalents	289,503	289,504	1	0	0	0	0	0	0
Banks	300,581	300,923	342	0	0	0	0	0	0
Interest-bearing securities	116,316	116,578	262	7,851	8,917	1,066	0	0	0
Loans and advances	278,861	279,539	678	3,267	3,320	53	904	3,611	2,707
Off-balance sheet liabilities	40,839	40,891	52	0	0	0	0	0	0
<b>Total</b>	<b>1,026,101</b>	<b>1,027,436</b>	<b>1,335</b>	<b>11,118</b>	<b>12,237</b>	<b>1,119</b>	<b>904</b>	<b>3,611</b>	<b>2,707</b>

## Counterparty credit risk

Counterparty credit risk for derivatives entails a risk of financial loss for both parties to a transaction. This is because the market value of a transaction changes over time due to changes in the underlying market factors. The market values can thus fluctuate between positive (profit) and negative (loss) amounts until the maturity date. It arises mainly from the derivative contracts and securities financing transactions.

The Bank's policy is to manage tightly all counterparty credit risks for derivatives while entering into the transactions necessary to maintain a sound operating environment.

Derivative financial instruments consisting of foreign currency forward contracts, foreign currency swaps and interest rate swaps are initially recognized at cost with subsequent measurement to their fair value at each balance sheet date. Fair values are obtained or determined from quoted market prices in active markets. All derivatives are separately evaluated and carried as assets when each transaction's fair value is positive and as liabilities when each transaction's fair value is negative. Derivative contracts are included in the off-balance sheet items and changes in the fair values are included in the income statement unless hedge accounting is applied.

Derivative financial instruments include risk factors such as currency and interest rate. The notional amounts and the respective fair value amounts of the aforementioned positions are presented below.

31 December 2024							
(000 EUR)	Notional Amounts	Up to 1 month	Up to 3 months	Up to 1 year	Over to 1 year	Fair value assets	Fair value liabilities
FX Swap buy	198,768	108,768	0	55,000	35,000	255	0
FX Swap sell	205,192	109,658	0	58,182	37,352	0	5,426
IRS buy	148,770	0	0	10,000	138,770	2,057	0
IRS sell	148,770	0	0	10,000	138,770	0	1,500
CCS buy	2,742	0	2,742	0	0	0	0
CCS sell	2,629	0	2,629	0	0	0	109
CDS buy	5,000	0	0	0	5,000	118	0
CDS sell	5,000	0	0	0	5,000	0	0
<b>Total</b>	<b>716,871</b>	<b>218,426</b>	<b>5,371</b>	<b>133,182</b>	<b>359,892</b>	<b>2,430</b>	<b>7,035</b>

31 December 2023							
(000 EUR)	Notional Amounts	Up to 1 month	Up to 3 months	Up to 1 year	Over to 1 year	Fair value assets	Fair value liabilities
Fx Swap buy	323,387	158,701	84,686	80,000	0	2,730	0
Fx Swap sell	324,528	160,121	85,340	79,067	0	0	3,460
IRS buy	139,565	0	0	59,300	80,265	2,300	0
IRS sell	139,565	0	0	59,300	80,265	0	1,568
CCS buy	5,579	0	0	0	5,579	55	0
CCS sell	5,689	0	0	0	5,689	0	0
FX Forward buy	5,000	5,000	0	0	0	0	0
FX Forward sell	4,535	4,535	0	0	0	0	0
<b>Total</b>	<b>938,313</b>	<b>318,822</b>	<b>170,026</b>	<b>277,667</b>	<b>171,798</b>	<b>5,085</b>	<b>5,028</b>

The bank applies hedge accounting for certain exposures. More details are provided in the Annual Report.

### Mitigation and control

To mitigate counterparty credit risk for derivatives, contracts entered into with counterparties make use of ISMA (International Securities Markets Association), GMRA (Global Master Repurchase

Agreement), and ISDA (International Swaps and Derivatives Association) agreements with Credit Support Annex (CSA). For such derivatives, the Bank may provide or require eligible collateral.

In order to minimize the risk arising from counterparties, the Bank selects well known market participants for derivatives transactions. Counterparties with above investment grade ratings composed over 91% of the total derivatives exposure as of 2024-year end.

# Market risk

Market risk is the risk of loss from movements in market factors (i.e. interest rates, credit spreads, equity prices, foreign exchange rates and etc.), their implied volatilities and the correlations between them. Market risk stems from all positions included in the bank's trading book and net foreign exchange positions in the balance sheet.

The Bank applies the Standardized Approach to calculate the market risk capital requirement in its trading book under Pillar I capital requirement calculation. The following table shows the breakdown of capital requirement for market risk at the end of 2023 and 2024 respectively.

(000 EUR)	31/12/2023		31/12/2024	
	Risk weighted assets	Capital requirement	Risk weighted assets	Capital requirement
Traded debt instruments	-	-	-	-
Equity	-	-	-	-
Foreign exchange	1,836	147	2,586	207
Commodities	-	-	-	-
<b>Total</b>	<b>1,836</b>	<b>147</b>	<b>2,586</b>	<b>207</b>

## Foreign currency risk

Foreign currency risk arises when an entity's equity and profit are under threat as a result of foreign exchange rate fluctuations. Inherently, the Bank does business in multiple currencies and is exposed to currency risks unless these risks are properly hedged. Net open currency position is managed with respect to the internal risk appetite limits that are assigned for both banking book and trading book positions. The foreign currency exposure in the banking book is hedged generally by using derivatives transactions. As a result, the Bank has no material net exposure to foreign exchange rate fluctuations due to the prudent risk management outlined in the relevant policies.

The Management Board and Supervisory Board set limits on the level of exposure by each currency or currency groups and also in total which are monitored on a daily basis. The capital requirement for foreign currency risk of the Bank under Pillar I (standardized approach) is calculated as taking the net short or long position in each foreign currency. Then the total net open position is calculated by aggregating the sum of the net short positions or the sum of net long positions, whichever is the greater. This total net open foreign currency position requires a capital of 8% of the exposure. The Bank's exposure to foreign currency exchange rate risk at the year end, on the basis of the Bank's assets and liabilities at carrying amounts, categorized by currency, is disclosed in the risk management section of the Annual Report.

## Interest rate risk

The Bank measures the minimum capital requirement for interest rate risk in the trading book by applying 'specific risk' and 'general market risk approaches'. The Bank held no positions in the trading book subject to interest rate risk as of end of 2024.

## Interest rate risk on banking book

Interest rate risk in the banking book (IRRBB) refers to the current or prospective risk to the bank's capital and earnings arising from adverse movements in interest rates that affect the bank's banking book positions. When interest rates change, the present value and timing of future cash flows change. This in turn changes the underlying value of a bank's assets, liabilities and off-balance sheet items and hence its economic value.

Since IRRBB is not separately identified by Pillar I regulatory capital, the Bank captures this risk under Pillar II in the ICAAP.

Anadolubank calculates the respective capital requirement by using measures described in the following paragraphs. These measures strongly relate to the regulatory report that is required to monitor at least on a quarterly basis.

### Earnings at risk

Earnings at Risk (EaR) measure intends to quantify the volatility of the expected future earnings (income), depending on the potential future interest rates over the predefined horizon of this measure (at least one year). Obviously, these future interest rates, and new transactions during the time horizon, are not known in advance and consequently future earnings are uncertain as well. Earnings measures may, in addition to a run-off view, assume rollover of maturing items (i.e. a constant balance sheet view) and/or assess the scenario-consistent impact on the bank's future earnings inclusive of future business (i.e. a dynamic view).

However, by applying several interest rate scenarios, the volatility of the earnings can be forecasted over a particular future period. The Earnings at Risk is the level of earnings that correspond to an impact of pre-defined scenario compared to the 'best estimate' on earnings, i.e. the expected change in the value of earnings.

Overall, the Bank aims to adopt matched currency funding and actively manages the balance sheet to avoid the duration mismatches. The following table presents the interest rate sensitivities for the 1-year horizon in the banking book from an income perspective under a constant balance sheet assumption at the end of 2024.

<b>(000 EUR)</b>		<b>Earnings at Risk</b>	
<b>Shock to yield curve</b>	<b>31/12/2023</b>	<b>31/12/2024</b>	
Parallel up	5,348	3,942	
Parallel down	-5,348	-4,562	

### Economic value of equity

In addition to the EaR measure, the Economic Value of Equity (EVE) measure is also used for measuring the IRRBB. For this measure, the fair values are calculated for the entire balance sheet items against discount rates applicable as of report date and then compared to a revaluation with the shocked discount rates. Economic value measures reflect changes in value over the remaining life of the bank's assets, liabilities and off-balance sheet items, i.e. until all positions have run off.

The EVE result for the end of 2024 is presented below.



(000 EUR)	Economic Value of Equity	
	31/12/2023	31/12/2024
Shock to yield curve		
Parallel up	160	-1,462
Parallel down	-2,388	379
Steep	-980	-189
Flat	67	-908
Short up	-46	-1,470
Short down	-1,966	63

## IRRBB strategy, governance, capital requirement

The Management Board retains ultimate responsibility for the effective management of IRRBB. The ALCO proactively manages IRRBB and the Treasury & ALM Department provides strategic insight in managing IRRBB, in addition to the execution mandates. The Financial & Operational Risk Management Department provides appropriate risk measurement, reporting and analytics.

Anadolubank has fully implemented the methodology changes, published by European Banking Authority (EBA). The new methodology and the respective stress scenarios are monitored at least on a quarterly basis.

Appropriate limits have been set regarding the exposures for both EaR and EVE. Compliance with these limits is monitored and reported to the ALCO and the Management Board on a regular basis.

To establish a capital requirement, it is important first to consider the fundamental differences between EVE and EaR: in contrast to EaR, EVE does not have the concept of a horizon, it simply is a valuation at an assumed changed interest rate. For EaR, the concept of the horizon is an essential part of the methodology. In this case the instantaneous shift may seem less realistic as interest rate typically move gradually.

The bank uses the results derived from the EVE analysis and the EaR analysis. The most negative impact for EVE is EUR 1.5m, for EaR it is 4.6m. The highest negative impact is the capital add-on for the interest rate risk in the banking book under Pillar II for the year-end 2023.

## Credit spread risk in the banking book

Credit Spread Risk in the Banking Book (CSRBB) is the risk of market price changes due to credit risk or liquidity risk while assuming the same level of creditworthiness.

The calculated credit spread scenarios per rating category are applied to the positions per rating category. The calculation is only executed for the EVE measurement. Anadolubank holds EUR 0.2m as capital add-on for credit spread risk in the banking book under Pillar II.

# CVA risk

Credit valuation adjustment risk is defined as an adjustment to the fair value of derivative instruments based on the credit quality of the counterparty.

The Bank applies the Standardized Approach to calculate the CVA risk capital requirement in its derivatives portfolio under Pillar I capital requirement calculation. The following table shows the capital requirement for CVA risk at the end of 2023 and 2024 respectively.

(000 EUR)	31/12/23		31/12/24	
CVA risk	risk weighted asset		risk weighted asset Capital requirement	
Credit Valuation Adjust	1,342	107	1,050	84

The bank executes derivatives transactions to hedge various imbalances on its own balance sheet in order to reduce risk such as currency and interest rate risk. The bank's derivative position (notional amounts) per counterparty credit rating is presented in the below table.

(000 EUR)	31/12/24	
External Credit Rating	Amount	Share in Total
Above AA-	55,438	16%
A+ to A-	218,069	61%
BBB+ to BBB-	46,888	13%
Below BBB-	31,923	9%
Unrated	2,412	1%
<b>Total</b>	<b>354,730</b>	<b>100%</b>

# Operational risk

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Operational risk is the risk of direct or indirect loss arising from a wide variety of causes associated with the Bank's processes, personnel, technology and infrastructure, and from external factors other than credit, market and liquidity risk such as those occurring from legal and regulatory requirements and generally accepted standards of corporate behavior. Operational risks emerge from all of the Bank's operations.

Operational risk is inherent in all banking products, activities, processes and systems, and the effective management of operational risk is a fundamental element of a bank's risk management program. Sound operational risk management is a reflection of the effectiveness of the bank in administering their portfolio of products, activities, processes, and systems.

The operational risk management governance structure is based on the "three lines of defence" model.

- The 1st Line of Defence includes all the business lines, each one directly responsible for controlling and minimizing the operational risk within their business activities in compliance with the bank's standards and policies.
- The 2nd Line of Defence includes the Financial & Operational Risk Management Department, which is primarily responsible for developing and providing the operational risk management methodologies, tools and guidance to be used at the department level for the management of operational risk. The Financial & Operational Risk Management Department is supported by other supporting departments such as Compliance, and Internal Control. Furthermore, monitoring of operational risk and assisting in mitigating actions also belong to this line of defence.
- The 3rd Line of Defence is Internal Audit, which is responsible for independently ensuring that the operational risk management framework is effective, appropriate and functioning with integrity.

The bank has the Operational Risk Management Policy in place. The roles and responsibilities of the Supervisory Board and Management Board and also the business units, operational risk management governance, operational risk principles, operational risk typology, operational risk management process methodology, and operational risk reporting are clearly articulated in this policy.

Risk Control Self-Assessment (RCSA) is carried out to further examine the operational risks and related controls. The key objective is to identify risks and take actions to reduce them to an acceptable level. The RCSA has been performed with the cooperation of each department based on their own processes. The Financial & Operational Risk Management Department is involved to the assessment phase in order to ensure there is consistency and consolidation.

## **Measurement, mitigation and processes**

The primary responsibility for the development and implementation of controls to address operational risk is assigned to head of the each business unit. This responsibility is supported by the development of compliance to the overall standards for the management of operational risk.

The Bank continuously has internal and external projects to ensure that it can continue to comply with changing legislation and regulation. The Bank devotes much attention to this area. Legislation and regulation in the financial sector continued to be subject to rapid change and increasing complexity. The departments of Compliance, Financial & Operational Risk Management, Internal Control and Internal Audit have been strengthened accordingly.

Each department is individually accountable for its results as well as for the risks associated with its operations. A balance must be struck between risk and return, and this must comply with the relevant risk limits.

The Bank collects and records operational loss events in a database, which is managed and maintained by the Financial & Operational Risk Management Department to capture key information on operational losses. This data is analyzed and then reported to the Management Board to provide insight into operational risk exposures, trends and the relevant action plans. The Bank uses the Basic Indicator Approach to calculate the regulatory required capital for the operational risk. The calculation is based on a single indicator which is the gross income. Risk weighted assets are calculated as 15% of the average of the last three years' gross income.

The following table presents the regulatory capital requirement for operational risk.

(000 EUR)	Operational Risk	
	31/12/23	31/12/24
<b>Basic indicator approach (BIA)</b>		
Exposure	46,823	64,246
Capital requirement	3,746	5,140

# Climate-related and environmental risks

Climate change and environmental degradation are sources of structural change that affect economic activity and, in turn, the financial system. Climate-related and environmental risks are commonly understood to comprise two main risk drivers: physical risk and transition risk.

Physical and transition risks are drivers of prudential risk, in particular credit risk, operational risk, market risk and liquidity risk. These risks also affect the sustainability of the institutions' business model in the medium to long term, and particularly institutions whose business model is reliant on sectors and markets that are particularly vulnerable to climate-related and environmental risks. Methodologies to estimate the magnitude of climate-related risks for the financial system in general, and banks specifically, are rapidly developing.

Anadolubank has established the 'Climate-related & Environmental Risk Policy' document in 2024. The policy document describes the governance and principles for the measurement, management and reporting of climate-related and environmental (C&E) risks within Anadolubank. In this C&E Risk Policy, Anadolubank addresses C&E risks across all aspects of its operations: from the lending activities to risk management and reporting.

Anadolubank considers C&E risks to be drivers of the 'classical' risk categories, like credit risk, market risk, and strategic risk. It is acknowledged that C&E risks can have a material impact on these risk categories, potentially affecting the financial stability, operations, and reputation. The following policy principle is formulated for the Risk Taxonomy with respect to C&E risks. C&E risks are not distinguished as a separate 'key risk type' in Anadolubank's RAF. Instead, the potential impact of C&E risks on all 'key risk types' present in the Risk Taxonomy needs to be assessed separately through the RI&MA on sector-level.

The process to perform the sector-level RI&MA consists of the following six steps:

- 1.High-level risk type selection
- 2.Sector classification per risk type and scope
- 3.Environmental risk factors and transmission channels
- 4.Likelihood and impact categories
- 5.Risk identification & materiality assessment per sector
- 6.Heatmaps.

The sector-level RI&MA is performed for all sectors that make up at least 10% of Anadolubank's loan book. Furthermore, the total coverage of all sector-level RI&MAs combined should at least be 85%.

The RI&MA on sector-level is a foundational assessment. Based on the outcomes of the sector-level RI&MA, the sectors most exposed to C&E risks are identified. To further the understanding of the C&E risks involved in the portfolio, counterparty-level RI&MAs are performed too. The counterparty-level RI&MAs need to meet the following requirements:

- For all counterparties with a credit limit equal to or more than EUR 5 million, a counterparty-level RI&MA needs to be performed. This RI&MA is focused on the potential impact from environmental risk factors on the credit and strategic risk profile of the on- or off-balance sheet position.

- The assessment always needs to address the quality of the counterparty's transition plan and their exposure/vulnerability to extreme weather events. Next to that, the materiality needs to be assessed of all environmental risk factors that have been classified as a level 3 or 4 materiality in at least one of the long-term sector-level heatmaps for strategic risk or in the credit risk sector-level heatmap with a time horizon corresponding to the maturity of the loan.

Transparent internal reporting is required to achieve a strong awareness of the C&E risks at all layers of the organisation. The following applies to Anadolubank's internal reporting:

- Anadolubank reports on its C&E risk profile to the Management Board on a predefined frequency.
- The Management Board of Anadolubank is responsible for taking prompt, adequate action in the event that the business operations are no longer in line with the policy from a C&E risks perspective.
- The Supervisory Board is periodically provided with an overview of Anadolubank's C&E risk management efforts, compliance with regulatory standards, and key risk metrics. This enables the Supervisory Board to exercise its oversight and governance role.

Anadolubank's roadmap for 2025 includes:

- Expanding scenario analysis in ICAAP and ILAAP
- Strengthening C&E data collection and infrastructure
- Preparing for disclosures, taking into account the evolving guidance
- Comprehensive C&E training and capacity building for the Board and all employees across the Bank.

Through these steps, Anadolubank aims to embed environmental and climate risk considerations deeply across its operations, strategy, and governance, while fulfilling supervisory expectations and contributing to sustainable finance goals.

# Liquidity risk

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Liquidity risk is commonly defined as the ability of an institution to fund increases in assets and meet its obligations as they come due, without incurring unacceptable losses.

Anadolubank is responsible for the sound management of liquidity risk by establishing a good liquidity risk management framework that ensures sufficient liquidity, including a cushion of unencumbered, high quality liquid assets, to withstand a range of stress events, including those involving the loss of both unsecured and secured funding sources. The Bank needs to keep sufficient liquidity buffer to cover all risks taken over a foreseeable time horizon. The Bank strives to be efficient in its use of liquidity through active daily management of the balance sheet items with respect to different asset, liability and risk categories. The bank's goal is to enhance viability while maintaining a prudent risk-return relationship with an adequate level of liquidity at all times.

The relevant liquidity risk policy ensures effective liquidity risk management within the Bank. It is described how the Bank identifies, evaluates, measures, monitors, manages and reports its liquidity. Also, the policy clearly outlines the structure, responsibilities and controls for managing liquidity risk and overseeing the liquidity positions of the Bank. In addition to the liquidity risk policy, Contingency Funding Plan provides a framework for detecting an upcoming liquidity stress event with predefined early warnings and actions for preventing temporary or longer term liquidity disruptions.

## Management

The objective of the Liquidity Risk Policy is to ensure that sufficient liquid assets and funding capacity are available to meet financial obligations and sustain withdrawals of confidence sensitive deposits in a timely manner and at a reasonable cost, even in times of stress.

The Policy aims to ensure that the Bank does maintain an adequate level of unencumbered, high-quality liquid assets that can be converted into cash, even in times of stress. The Bank has also implemented stringent stress tests that have a realistic basis in the Bank's operating environment to further measure the Bank's ability to withstand different and adverse scenarios of stressed operating environments.

The Bank's liquidity risk is managed by the ALM & Market Risk Department and related indicators are calculated and monitored by the Financial & Operational Risk Management Department. Both departments provide insight about the liquidity position of the Bank and the financial markets. The Bank's Internal Audit function assesses whether the liquidity management process is designed properly and is operating effectively.

The Bank monitors the short term and the long term liquidity risks with respect to various time horizons and also for different currencies. The contractual maturity breakdown of assets and liabilities are disclosed in the relevant section of the Annual Report which exhibits that the Bank does not carry a large maturity mismatch.

## Measurement

Key indicators and metrics that are used to measure and monitor liquidity risk with respect to regulatory reporting requirements are listed below.

- Liquidity Coverage Ratio (LCR)
- Net Stable Funding Ratio (NSFR)
- Additional Liquidity Monitoring Metrics (ALMM)

All above mentioned measures are monitored on a predefined frequency. The Liquidity Coverage Ratio was well above the minimum regulatory requirement (as of end 2024, 160%), where the NSFR was 155%, which is already above the minimum regulatory requirement set by DNB. Apart from the liquidity ratios, as being part of the regulatory requirements, Additional Liquidity Monitoring Metrics are calculated and monitored accordingly. These metrics support the Bank to have a detailed overview of the liquidity profile in addition to the liquidity coverage and stable funding requirements.

In addition to the above measures, the Bank monitors the asset encumbrance ratio which is defined as the ratio of encumbered assets to the total assets. As it can be seen from the below table, the ratio is well below the 15% of internal risk appetite limit.

	31/12/23	31/12/24
Asset Encumbrance Ratio	0.4%	0.5%

The breakdown of the encumbered assets are presented in the below table.

(000 EUR)		Asset Encumbrance		
31 December 2024	Carrying amount of encumbered assets	Fair value of encumbered assets	Carrying amount of non-encumbered assets	Fair value of non-encumbered assets
Loans on demand	0	0	259,024	0
Equity instruments	0	0	0	0
Debt securities	0	0	124,421	125,589
Loans and advances other than	5,468	0	721,641	0
Other assets	0	0	5,268	0
<b>Total</b>	<b>5,468</b>	<b>0</b>	<b>1,110,354</b>	<b>125,589</b>

## Stress test & sensitivity analysis

Various stress tests have been constructed to measure how different scenarios affect the liquidity risk of the Bank. The stress tests are conducted periodically and measure the Bank's ability to withstand the potential outflows on the funding (i.e. deposit withdrawals) under various levels of adverse conditions. These stress tests are set up to measure the Bank's ability to operate in its current economic environment.

The defined stress test scenarios are in line with the requirements in the Internal Liquidity Adequacy Assessment Process (ILAAP). The Financial & Operational Risk Management Department with consultation of the Asset and Liability Committee (ALCO), designed an idiosyncratic, market wide and combined liquidity stress test to assess the flexibility of the bank in a consistent way to hypothetical adverse economic conditions.

The liquidity stress test results show that the available liquidity is sufficiently above the level of minimum requirement in each scenario as of 31 December 2024.



## **Control and monitoring**

The Supervisory Board and the Management Board review the Bank's Risk Appetite Framework every once a year with regards to liquidity risk and, furthermore the Management Board also discusses the Bank's balance sheet management with respect to liquidity risk in its periodic meetings. Risk-related matters are also discussed in detail by the Supervisory Board of the Bank. ALCO is responsible for deciding on strategies, policies and practices on liquidity risk in accordance with the risk tolerance while taking into account key business units, products, legal structures and regulatory requirements.

The ALM & Market Risk Department is responsible for day-to-day liquidity management and execution within the Bank and that entails closely monitoring the risk profile and potential market developments that may present significant and complex challenges for the Bank's liquidity risk strategy. The management of the liquidity buffer and the high quality liquid assets is under the responsibility of the ALM & Market Risk Department, which manages the portfolio in accordance with the Liquidity Risk Policy and respective risk appetite limits. In addition to the ALCO, the Financial & Operational Risk Management Department regularly evaluates the Bank's liquidity position, monitors internal and external events and factors that may affect the liquidity position and also ensures compliance with the liquidity management policy.

Furthermore, the Bank carries out Internal Liquidity Adequacy Assessment Process (ILAAP) based on DNB's ILAAP Policy Rule and submits the required documentation to DNB as part of the Supervisory Review and Evaluation Process (SREP). The internal process, governance and consultative dialogue with the regulatory supervisory body required to meet the ILAAP rules are similar to the ICAAP. The ILAAP Supervision Manual gives an all-encompassing qualitative and quantitative guidance for liquidity risk management and for the implementation of the relevant liquidity risk regulations.

## **Early warning indicators and escalation procedures**

There are escalation procedures that are applied if the lower limit of any early warning indicator is breached, using a 'traffic-lights' model. This is a system of warning signals that lead to an increased level of alertness with respect to the current situation. When none of the escalation criteria have been activated, this is known as green (safe). This can be escalated to yellow (warning) and finally red (trigger).

## **Contingency funding plan**

The Bank has a Contingency Funding Plan which is set to provide a framework for detecting an upcoming liquidity event with predefined early warning indicators and actions for preventing temporary or longer term liquidity disruptions.

The Contingency Funding Plan stipulates the action plans and procedures which shall be taken if the occurrence of a liquidity event or a confidence crisis is likely or imminent.

## **Residual contractual maturities of financial assets and liabilities**

The tables below represent the undiscounted cash flows of the financial assets and liabilities on the basis of their contractual maturities. The expected cash flows on these instruments may vary from this analysis. For example, demand deposits (savings) from customers are expected to maintain a stable balance. The net liquidity gaps per tenor are monitored as part of the liquidity risk management within the Bank.

(000 EUR)		Liquidity Gap - Contractual View						
31 December 2024	Total	Demand	< 1 month	1-3 months	3-12 months	1-5 years	> 5 years	Not distributable
<b>Assets</b>								
Cash and cash equivalents	259,027	245,543	13,484	0	0	0	0	0
Banks	346,022	0	15,009	45,185	213,222	72,606	0	0
Loans and advances	381,086	0	66,715	126,773	159,380	28,218	0	0
Interest bearing securities	124,421	0	7,550	3,060	31,953	72,487	9,371	0
Current tax assets	309	0	0	0	0	309	0	0
Deferred tax assets	0	0	0	0	0	0	0	0
Other assets	4,957	0	0	0	0	2,430	0	2,527
<b>Total assets</b>	<b>1,115,822</b>	<b>245,543</b>	<b>102,758</b>	<b>175,018</b>	<b>404,555</b>	<b>176,050</b>	<b>9,371</b>	<b>2,527</b>
<b>Liabilities</b>								
Banks	59,816	0	37,942	0	21,874	0	0	0
Funds entrusted	885,685	170,265	409,611	70,271	163,294	70,962	1,282	0
Current tax liabilities	0	0	0	0	0	0	0	0
Deferred tax liabilities	774	0	774	0	0	0	0	0
Other liabilities	11,908	0	11,897	0	0	0	0	11
Lease obligation	1,123	0	23	47	199	854	0	0
Shareholders' equity	156,516	0	0	0	0	0	0	156,516
<b>Total liabilities</b>	<b>1,115,822</b>	<b>170,265</b>	<b>460,247</b>	<b>70,318</b>	<b>185,367</b>	<b>71,816</b>	<b>1,282</b>	<b>156,527</b>
<b>Net liquidity</b>	<b>-</b>	<b>75,278</b>	<b>-357,489</b>	<b>104,700</b>	<b>219,188</b>	<b>104,234</b>	<b>8,089</b>	<b>-154,000</b>

(000 EUR)		Liquidity Gap - Contractual View						
31 December 2023	Total	Demand	< 1 month	1-3 months	3-12 months	1-5 years	> 5 years	Not distributable
Total assets	1,004,845	289,503	77,481	66,570	284,381	255,560	29,236	2,114
Total liabilities	1,004,845	187,808	286,435	184,665	130,732	81,282	1,102	132,821
<b>Net liquidity</b>	<b>-</b>	<b>101,695</b>	<b>-208,954</b>	<b>-118,095</b>	<b>153,649</b>	<b>174,278</b>	<b>28,134</b>	<b>-130,707</b>

# Capital management

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The Bank had a Total Capital Ratio (TCR) of 19.3% at the end of 2024. In light of continued uncertainty in the financial environment, the Bank chooses to maintain its financial strength. DNB stringent requirements on capital and liquidity ratios, and even higher demands made by the Supervisory Board and the Management Board in this respect, have proven to be an important part of the Bank's strategy. As long as uncertainties remain in the economic environment, it is beneficial for the Bank to maintain strong capital ratios.

The capital planning is subject to two overall considerations:

- i. Optimization of the risk and maximization of earnings;
- ii. Increase the banking activities within the defined risk appetite.

## Capital structure

The Bank's capital base is composed of only Common Equity Tier 1 (CET1) capital. This capital comprises of paid-in capital, reserves, the profits retained in prior years and the result for the current year. Intangible assets, deferred tax assets and the unrealized loss on investments carried as available for sale (AFS) are deducted from CET1 capital.

## Calculation of capital requirements under SREP

According to the respective regulations on capital requirements, the capital base of a financial undertaking is required to correspond to a minimum of 8% of the sum of RWA of credit and counterparty credit risk, market risk, credit value adjustment and operational risk as calculated under Pillar I. Additional capital requirements, buffers and other factors are determined under Pillar II.

Based on the SREP decision letter, DNB expects that Anadolubank complies with Pillar 2 capital guidance (P2G) of 0.70%, to be made up entirely of Common Equity Tier 1 capital and to be held, on top of:

- i. the minimum own funds requirement under article 92(1)(a), (b) and (c) of the CRR;
- ii. the own funds requirement of 4.97% required to be held in excess of the minimum own funds requirement and to be maintained at all times, to be made up in the form of 56.25% of CET1 capital and 75% of Tier 1 capital, as a minimum.
- iii. the combined buffer requirement as defined in point (6) of article 128 CRD.

For establishing the P2G, DNB takes into account the impact of different stress scenarios on the capital ratio of Anadolubank.

The table presents a breakdown of the capital requirements and the risk-weighted exposure amounts as of 31 December 2023 and 31 December 2024.

(000 EUR)	Total Capital Ratio	
Capital requirements	31/12/23	31/12/24
<b>Total risk weighted assets</b>	<b>643,738</b>	<b>810,272</b>
Credit and counterparty credit risk	593,737	742,390
Market risk	1,836	2,586
Credit valuation adjustment	1,342	1,050
Operational risk	46,823	64,246
<b>Total capital</b>	<b>132,772</b>	<b>156,455</b>
<b>Tier 1 capital</b>	<b>132,772</b>	<b>156,455</b>
Capital instruments eligible as CET1 Capital	75,000	75,000
Retained earnings	56,450	79,308
Accumulated other comprehensive income	1,321	2,209
Adjustments to CET1 due to prudential filters	-	(62)
<b>Tier 2 capital</b>	<b>-</b>	<b>-</b>
<b>Tier 1 ratio</b>	<b>20.6%</b>	<b>19.3%</b>
<b>Total capital ratio</b>	<b>20.6%</b>	<b>19.3%</b>

As can be deduced from the table, the largest part of the total risk weighted assets relates to credit risk (92%). Market risk and CVA accounts for less than 1% and operational risk comprises 8% of the total risk weighted assets as of 31 December 2024.

## Leverage ratio

In addition to the changes in the minimum required solvency, a non-risk based measure, namely the Leverage Ratio, has been established to limit excessive leverages in the financial industry. Anadolubank does not carry large amounts of assets and/or off-balance sheet items which may not be captured in a risk based approach due to low risk weights assigned within the capital requirement regulations. As a result, Anadolubank has sustainable and high leverage ratio. At the end of 2024, the leverage ratio was at 13%, which is well above the minimum requirement of 3%.

## Internal capital adequacy assessment process (ICAAP)

ICAAP is the bank's internal process to assess its overall capital adequacy in relation to its risk profile and strategy to maintain capital at sound levels. It ensures the bank has adequate capital to support both Pillar I and Pillar II risks. In addition, ICAAP also ensures the bank has adequate capital to withstand stressed circumstances.

The Bank is exposed to the following material risks which arise from financial instruments:



The following table presents the capital allocation process by the risk type.

<b>Risk Type</b>	<b>Covered in</b>
Credit and Counterparty Credit Risk	Pillar I and Pillar II
Concentration Risk	Pillar II
Market Risk	Pillar I and Pillar II
Credit Value Adjustment Risk	Pillar I
Interest Rate Risk in the Banking Book	Pillar II
Operational Risk	Pillar I and Pillar II
Liquidity Risk	ILAAP Framework

The ICAAP is owned by the Management Board and approved by the Supervisory Board, and then submitted to the DNB annually or more frequently if there is a material change in strategy or risk profile of the Bank. DNB reviews the Bank's ICAAP report and sets capital requirements following its SREP.

In addition, the Bank uses the ICAAP to:

- Raise risk-awareness within the Bank;
- Perform a process to adequately identify and measure the risk factors;
- Carry out a process to monitor whether the capital is adequate in relation to the risk profile, including the stressed environment;
- Review the soundness of the risk management systems and controls that are used to assess, quantify and monitor the exposures.

The ICAAP is embedded into the risk management framework. The Management Board and senior management participate in the process of identifying and evaluating their exposures, in cooperation with Risk Management Department. The result from the identification phase serves as the basis for the risk identification within the ICAAP and ILAAP.

# Remuneration policy

Remuneration policy relates to the fixed and variable remuneration of staff, meaning all forms of payments and benefits made directly by, or indirectly, Anadolubank in exchange for employment services rendered by staff, which includes salaries, fringe benefits, bonuses, other fees, cost remuneration, severance payments which are contractual agreed upon and discretionary pension benefits (if any).

The Policy corresponds to sound and effective risk management and it does not encourage taking risks that are not acceptable to Anadolubank. It considers the interests of the customers, staff members, shareholders, other stakeholders and Anadolubank.

The remuneration revolves around following the following core principles:

- In compliance with the relevant laws and regulations;
- Aligned with the business strategy of the Bank (long & short term);
- Aligned with the bank's policies;
- Balanced representation of different stakeholder interests.

## Governance

Various bodies and functions have an important role in the determination, implementation and control of the Policy. Considering the size of the Bank, a separate Remuneration Committee is not established and relevant issues are addressed by the Supervisory Board.

- The Management Board is responsible for the implementation of the Policy, except in relation to its own Remuneration policy. The Management Board presents a remuneration proposal annually to the Supervisory Board. The remuneration of the senior officers in the risk management, audit and compliance departments are directly overseen by the Supervisory Board.
- The Supervisory Board approves the general principles of the Policy and oversees its implementation by the Management Board. The Supervisory Board is also responsible for the implementation and evaluation of the Policy, adopted for the members of the Management Board, and more particularly that it complies with the Remuneration Regulations.
- Internal Audit, Risk Management, and Compliance departments (Control Functions) are involved in the annual risk analysis of the remuneration policy, are independent from the business units to oversee compliance and test effectiveness and have appropriate authority to advise the Management Board and the Supervisory Board. These Control Functions act in joint cooperation with respect to the set-up, execution, evaluation and required amendments to the remuneration policy. Adequate processes are implemented within Anadolubank, including an escalation procedure towards the Supervisory Board.
- The remuneration proposals for the Head of Risk Management department, Head of Internal Audit and Head of Compliance department require the prior evaluation and approval of the Supervisory Board.

## Remuneration Methodology

### i. General Principles & Proportionality

In taking measures to comply with the remuneration principles Anadolubank complies in a way and to the extent that is appropriate with its size, internal organization and the nature, scope and complexity of its activities.

The awarding of remuneration will only take place if it does not limit the ability of Anadolubank to maintain a sound capital base in the long term and taking into consideration interests of its stakeholders.

It will at all times ensure that there is a proper balance between fixed remuneration and variable remuneration, considering the statutory maximum cap for variable remuneration under the Dutch law. As a general rule, the variable remuneration amount shall never exceed 20% of the fixed remuneration per annum.

However, in exceptional cases the Bank may decide to award a higher variable remuneration up to 100% of the fixed remuneration per annum, in particular to staff who mainly work in the Netherlands and whose employment conditions do not exclusively follow from a collective labour agreement (CLA), provided that the Bank will never award variable remuneration in excess of 20% of the fixed remuneration per annum to staff in Control Functions and to staff who are in direct contact with consumers. In addition, the average ratio between the fixed and variable remuneration of all staff mainly working in the Netherlands shall never exceed 20% on average (see article 1:121, section 2 Wft). When the Bank awards variable remuneration in excess of 20% of the fixed remuneration per annum to staff who mainly work in the Netherlands, the competent authority will be notified, in accordance with article 1:120, section 4 Wft.

No variable remuneration will be awarded that provides an incentive to staff to recommend a particular financial instrument to a client. All awards of variable remuneration are always subject to malus- and clawback arrangements and can be reduced to zero where and when necessary.

As a general rule, the granting of guaranteed variable remuneration does not occur within Anadolubank. Where exemptional cases exist, within applicable laws, the specific policy requirements will apply.

The assessment takes place in a multiyear framework on the basis of pre-determined performance conditions at the level of the individual staff member, the business unit concerned and Anadolubank. Individual performance will be assessed based on annual performance assessments and considers current and future risks. The applicable performance conditions will consist for at least 50% of non-financial performance conditions.

Staff members are not allowed to use personal hedging strategies or remuneration- and liability-related insurance to undermine the risk alignment effects embedded in their remuneration arrangements.

### ii. Method of payment & severance payments

Anadolubank is normally obliged to defer at least 40% of every award of variable remuneration and to pay out at least 50% of every award of variable remuneration in the form of financial instruments. However, Anadolubank can apply an exemption as set out in article 94, section 3 of CRD V.

Anadolubank will reassess every year whether it can rely on the abovementioned exemption in article 94, section 3 CRD V and will subsequently decide whether it wants to rely on this exemption.

Payment of variable remuneration is at the full and sole discretion of Anadolubank. Variable remuneration is not paid through vehicles or methods that facilitate the avoidance of the requirements of the policy and are solely made in a fully transparent manner.

Under exceptional circumstances Anadolubank may award a severance payment to a staff member whose employment is terminated at the initiative of Anadolubank. In such cases specific requirements will require in line with the applicable laws and internal policy requirements.



# Annex 1: Own funds disclosure

## Template EU CC1 - Composition of regulatory own funds

31/12/2024

in EUR

Common Equity Tier 1 (CET1) capital: instruments and reserves		
1	Capital instruments and the related share premium accounts	75,000,000
	of which: Instrument type 1	
	of which: Instrument type 2	
	of which: Instrument type 3	
2	Retained earnings	56,450,350
3	Accumulated other comprehensive income (and other reserves)	2,208,870
EU-3a	Funds for general banking risk	
4	Amount of qualifying items referred to in Article 484 (3) and the related share premium accounts subject to phase out from CET1	
5	Minority interests (amount allowed in consolidated CET1)	
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	22,857,515
6	<b>Common Equity Tier 1 (CET1) capital before regulatory adjustments</b>	<b>156,516,735</b>
Common Equity Tier 1 (CET1) capital: regulatory adjustments		
7	Additional value adjustments (negative amount)	-271,928
8	Intangible assets (net of related tax liability) (negative amount)	
9	Not applicable	
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)	

11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	0
12	Negative amounts resulting from the calculation of expected loss amounts	
13	Any increase in equity that results from securitised assets (negative amount)	
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	
15	Defined-benefit pension fund assets (negative amount)	
16	Direct and indirect holdings by an institution of own CET1 instruments (negative amount)	
17	Direct, indirect and synthetic holdings of the CET 1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	
18	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	
19	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	
20	Not applicable	
EU-20a	Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative	
EU-20b	of which: qualifying holdings outside the financial sector (negative amount)	
EU-20c	of which: securitisation positions (negative amount)	
EU-20d	of which: free deliveries (negative amount)	
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)	
22	Amount exceeding the 17,65% threshold (negative amount)	

23	of which: direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities	
24	Not applicable	
25	of which: deferred tax assets arising from temporary differences	
EU-25a	Losses for the current financial year (negative amount)	0
EU-25b	Foreseeable tax charges relating to CET1 items except where the institution suitably adjusts the amount of CET1 items insofar as such tax charges reduce the amount up to which those items may be used to cover risks or losses (negative amount)	
26	Not applicable	
27	Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount)	
27a	Other regulatory adjustments	209,700
28	<b>Total regulatory adjustments to Common Equity Tier 1 (CET1)</b>	<b>-62,228</b>
29	<b>Common Equity Tier 1 (CET1) capital</b>	<b>156,454,507</b>
<b>Additional Tier 1 (AT1) capital: instruments</b>		
30	Capital instruments and the related share premium accounts	
31	of which: classified as equity under applicable accounting standards	
32	of which: classified as liabilities under applicable accounting standards	
33	Amount of qualifying items referred to in Article 484 (4) and the related share premium accounts subject to phase out from AT1	
EU-33a	Amount of qualifying items referred to in Article 494a(1) subject to phase out from AT1	
EU-33b	Amount of qualifying items referred to in Article 494b(1) subject to phase out from AT1	
34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties	

35	of which: instruments issued by subsidiaries subject to phase out	
36	<b>Additional Tier 1 (AT1) capital before regulatory adjustments</b>	
<b>Additional Tier 1 (AT1) capital: regulatory adjustments</b>		
37	Direct and indirect holdings by an institution of own AT1 instruments (negative amount)	
38	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	
39	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	
40	Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	
41	Not applicable	
42	Qualifying T2 deductions that exceed the T2 items of the institution (negative amount)	
42a	Other regulatory adjustments to AT1 capital	
43	<b>Total regulatory adjustments to Additional Tier 1 (AT1) capital</b>	
44	<b>Additional Tier 1 (AT1) capital</b>	
45	<b>Tier 1 capital (T1 = CET1 + AT1)</b>	<b>156,454,507</b>
<b>Tier 2 (T2) capital: instruments</b>		
46	Capital instruments and the related share premium accounts	
47	Amount of qualifying items referred to in Article 484 (5) and the related share premium accounts subject to phase out from T2 as described in Article 486 (4) CRR	
EU-47a	Amount of qualifying items referred to in Article 494a (2) subject to phase out from T2	
EU-47b	Amount of qualifying items referred to in Article 494b (2) subject to phase out from T2	

48	Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties	
49	of which: instruments issued by subsidiaries subject to phase out	
50	Credit risk adjustments	
51	<b>Tier 2 (T2) capital before regulatory adjustments</b>	
<b>Tier 2 (T2) capital: regulatory adjustments</b>		
52	Direct and indirect holdings by an institution of own T2 instruments and subordinated loans (negative amount)	
53	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	
54	Direct and indirect holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	
54a	Not applicable	
55	Direct and indirect holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	
56	Not applicable	
EU-56a	Qualifying eligible liabilities deductions that exceed the eligible liabilities items of the institution (negative amount)	
56b	Other regulatory adjustments to T2 capital	
57	<b>Total regulatory adjustments to Tier 2 (T2) capital</b>	
58	<b>Tier 2 (T2) capital</b>	
59	<b>Total capital (TC = T1 + T2)</b>	<b>156,454,507</b>
60	<b>Total risk exposure amount</b>	<b>810,271,819</b>
<b>Capital ratios and requirements including buffers</b>		

61	Common Equity Tier 1	19.31%
62	Tier 1	19.31%
63	Total capital	19.31%
64	Institution CET1 overall capital requirements	11.13%
65	of which: capital conservation buffer requirement	2.50%
66	of which: countercyclical capital buffer requirement	0.57%
67	of which: systemic risk buffer requirement	0.00%
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer requirement	0.00%
EU-67b	of which: additional own funds requirements to address the risks other than the risk of excessive leverage	3.56%
68	<b>Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements</b>	4.97%
69	Not applicable	
70	Not applicable	
71	Not applicable	
<b>Amounts below the thresholds for deduction (before risk weighting)</b>		
72	Direct and indirect holdings of own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	
73	Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 17.65% thresholds and net of eligible short positions)	
74	Not applicable	
75	Deferred tax assets arising from temporary differences (amount below 17.65% threshold, net of related tax liability where the conditions in Article 38 (3) are met)	

Applicable caps on the inclusion of provisions in Tier 2		
76	Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)	
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)	
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	
Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2022)		
80	Current cap on CET1 instruments subject to phase out arrangements	
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)	
82	Current cap on AT1 instruments subject to phase out arrangements	
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)	
84	Current cap on T2 instruments subject to phase out arrangements	
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)	