

Environmental Policy

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Construction & Premises

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1. Introduction

1.1 Climate change has important economic and ecological consequences; therefore, it is one of the dynamics that all stakeholders in the society (governments, regulatory agencies, corporations, consumers and all other stakeholders of the society) have to struggle with.

The transition to a low-carbon economy for combating climate change will have significant effects on the value chains of many sectors. Significant investments are required in most industries because of this transition. The investments that focus on energy efficiency, renewable energy, micro-mobility and circular economy, and technological developments offer new opportunities for everyone.

In line with these developments, one of the six strategic priorities determined by Garanti BBVA in 2019 was "Sustainability".

Within the scope of its sustainability strategy, Garanti BBVA's main objectives are;

- As a leading bank in sustainability, positively influencing customers, other stakeholders of the sector and decision makers; To increase awareness by continuing to use our social role effectively in this regard,
- Identifying risks and combating opportunities related to climate change and integrating these risks into our business processes.

This Environmental Policy has been established in the context of defining the roles and responsibilities in order to determine the environmental impacts in all activities carried out by Garanti BBVA and its subsidiaries and to take measures against possible negative effects. In the creation of this policy, the Sustainability Policy dated September 2021, the relevant legal regulations (Environmental Law No. 2872 and Zero Waste Regulation No. 30829) and national / international standards (ISO 14001 Environmental Management System principles, Zero Waste Management System etc.) were taken as reference.

2. Purpose and scope of application

Purpose

2.1 The aims of this policy are;

- In the current climate change conditions, as Garanti BBVA, to significantly and continuously increase the value we add to our customers, shareholders, employees, society and the environment,
- To determine and define the general principles and scope of application to be followed in the environmental management processes at the service points (Head Office, Service Buildings, Branches, Facilities and ATMs) in Garanti BBVA and its subsidiaries,
- Ensuring that the necessary actions are taken for the implementation of environmental management legislation, national / international standards and systems (ISO 14001 Environmental Management System principles, Zero Waste Management System, etc.) and compliance with the Bank's sustainability strategies.

Scope

- 2.2 Employees of Garanti BBVA and its subsidiaries.

3. General principles

3.1 Garanti BBVA and its subsidiaries consider the following principles regarding the environmental management system and commit to comply with these principles together with all its employees.

- To follow all environmental legal regulations, sustainability programs developed in national / international platforms, to integrate applicable areas, especially ISO 14001 Environmental Management System, into our processes; to fulfill our obligations in legal regulations and programs to which we are a member,
- To be respectful to the environment; to adopt and spread environmental awareness,

- To keep the direct environmental impacts arising from our activities under control, to ensure the effective use of natural resources together with continuous improvements in minimizing the negative effects on the environment,
- To contribute to the development of our employees by conducting training and internal communication activities to increase their awareness,
- To understand the needs of all stakeholders by encouraging multi-faceted communication and to contribute to their awareness and development,
- To plan our activities with an understanding based on the prevention of environmental pollution,
- To provide the necessary resources by the Upper Management in order to carry out the activities within the scope of the Environmental Policy,
- To ensure that the compliance of all activities with this policy is regularly reviewed by the Upper Management.

4. Policy provisions/guidelines

Scope

- 4.1 Sustainability Policy and 3.1. are the general principles set out in the article.

Instructions

- 4.2 Within the scope of this policy, the following instructions are taken into account when necessary.
- Documents supporting the Environmental Policy within the scope of ISO 14001 Environmental Management System (Environmental Manual and Procedures)
 - Zero Waste Management System of the Ministry of Environment, Urbanization and Climate Change

Exceptions

- 4.3 There are no exceptions to the application of this policy.

5. Governance and monitoring model

- 5.1 This policy was approved by the Board of Directors on 01/12/2022 as a result of the investigations carried out by the Responsible Banking and Sustainability Committee and was put into effect on 01/12/2022. Revised and republished on 29/04/2025.
- 5.2 This Policy has been prepared by Sustainable and Green Office team under Premises and Services Department and in collaboration with the Investment Banking and Finance Department's Sustainable Finance team, within their respective areas of responsibility.

Governance Model

- 5.3 The control model within the communication and processes established with internal and external stakeholders is called the "governance model". The governance model is structured to be traceable at every stage.
- 5.4 Periodic internal audits regarding the implementation of the sub-processes within the scope of this policy are carried out by the Sustainable and Green Office team under Premises and Services Department, and in case of non-compliances, action is taken to eliminate the non-conformities and/or necessary action is taken by the relevant parties.
- 5.5 For the continuity of national / international certificates, reporting requested by independent audit firms and relevant institutions in line with legal obligations is provided by the Sustainability Unit and the Sustainable and Green Office team under Premises and Services Department.
- 5.6 Internal audit and reporting activities aim to support the environmental management processes structurally, to be reliable, to comply with all regulatory requirements and to document them adequately.
- 5.7 Communication with the Holding is carried out by the Premises and Services Department within the framework of environmental policy and related processes. The Premises and Services Department informs the process stakeholders about the issues that may affect the processes.

- 5.8 At least once a year or when necessary in line with emerging developments, review activities are carried out by the Sustainable and Green Office team under Premises and Services Department in the procedures related to this Policy and necessary or desired changes are made. Required or desired changes are made by submitting to the Responsible Banking and Sustainability Committee and then to the approval of the Board of Directors.
- 5.9 Violation of this policy may result in revocation / suspension of ISO 14001 Environmental Management System Certification.

Glossary

ISO 14001 Environmental Management System: The ISO 14001 Environmental Management System Standard, published by the International Standards Organization, describes the establishment of a system that ensures the determination of environmental effects at every stage of corporate activities and minimizing the damage to the environment by controlling these determined effects with necessary measures.

Sustainability Policy:

Aiming to set forth the vision and general principles ("Policy") of Garanti BBVA's sustainability approach at the Bank,

- Defines and determines the general principles and basic management and control objectives and principles to be followed by the Bank in sustainable development,
- It is the policy that will serve as a frame of reference while establishing and developing local or sectoral corporate governance policies and systems that will be consistent and harmonious within the bank.

Zero Waste Management System: It is a waste management system that includes prevention of waste, more efficient use of resources, reduction or prevention of waste generation, separate collection of wastes at the source and their recovery. Activities in this direction are carried out within the scope of the Zero Waste Regulation No. 30829 dated 12.07.2019.

Change Log

Date	Description of the change	Author
01/12/2022	■ First writing and publishing	Construction and Premises Department / Sustainable & Green Office
27/05/2024	■ Annual review conducted; no changes made.	Construction and Premises Department / Sustainable & Green Office
29/04/2025	■ Annual review conducted; no changes made.	Construction and Premises Department / Sustainable & Green Office