

SUSTAINABILITY PRINCIPLES COMPLIANCE REPORT

| NO | PRINCIPAL | COMPLIANCE | | | | | EXPLANATIONS FOR THE PRINCIPALS THAT ARE NOT FULLY COMPLIANT | RELATED SECTION IN THE INTEGRATED REPORT OR OTHER SOURCES | PAGE NUMBER |
|--------------------------------------|--|------------|---------|----|----------|----------------|--|---|----------------|
| | | YES | PARTIAL | NO | EXEMPTED | NOT APPLICABLE | | | |
| A. GENERAL | | | | | | | | | |
| A1. Strategy, Policy and Targets | | | | | | | | | |
| 1 | The Board of Directors determines material ESG issues, risks and opportunities and creates ESG policies accordingly. In terms of the effective implementation of these policies; internal directives, business procedures of Companies etc. can be prepared. The Board of Directors takes decisions for these policies and they are publicly disclosed. | X | | | | | | Materiality Analysis | 60-66 |
| 2 | It determines the Company Strategy in line with the ESG policies, risks and opportunities. It determines the short and long term goals in line with the Company strategy and ESG policies and makes them public. | X | | | | | | Materiality Analysis, Value Creation Process, Sustainability | 60-87, 120-133 |
| A2. IMPLEMENTATION/MONITORING | | | | | | | | | |
| 3 | It determines the committees / units responsible for the execution of ESG policies and makes them public. The responsible committee / unit reports the activities carried out within the scope of the policies to the Board of Directors at least once a year and in any case within the maximum periods determined for the public disclosure of the annual activity reports in the relevant regulations of the Board. | X | | | | | | https://surdurulebilirlik.garantibbva.com.tr/garanti-bbva-sustainability-approach/garanti-bbva-and-sustainability/corporate-sustainability-governance/ | - |
| 4 | It creates and publicly discloses implementation and action plans in line with the short and long term goals determined. | X | | | | | | Value Creation Process, Sustainability | 60-87, 120-133 |

| NO | PRINCIPAL | COMPLIANCE | | | | | EXPLANATIONS FOR THE PRINCIPALS THAT ARE NOT FULLY COMPLIANT | RELATED SECTION IN THE INTEGRATED REPORT OR OTHER SOURCES | PAGE NUMBER |
|----------------------|---|------------|---------|----|----------|----------------|--|---|------------------|
| | | YES | PARTIAL | NO | EXEMPTED | NOT APPLICABLE | | | |
| 5 | Determines Key ESG Performance Indicators (KPIs) and explains them on a yearly basis. In the presence of verifiable data, it presents KPIs with local and international sector comparisons. | | X | | | | Considering the needs of the developing world; in parallel with the BBVA Group, we review and reshape our strategic priorities in the light of the main trends that have an impact in the world and in the financial sector. Together with our new strategic priorities, we share our progress in the performance criteria we have determined in the integrated report every year. The subject of presenting the KPIs disclosed in the report with local and international sector comparisons is an improvement area that will be implemented in the upcoming reporting periods. | Garanti BBVA in Numbers, 2021 KPIs | 36-37, 40-41 |
| 6 | Explains the innovation activities that improve the sustainability performance for business processes | X | | | | | | Sustainability, Operational Excellence - II | 120-133, 158-165 |
| A3. REPORTING | | | | | | | | | |
| 7 | It reports its sustainability performance, goals and actions at least once a year and makes it public. Explains the information on sustainability activities within the scope of the annual report. | X | | | | | | https://surdurulebilirlik.garantibbva.com.tr/library-resources/ | - |
| 8 | It is essential to share information, which is important for stakeholders in understanding the position, performance and development of the Company, in a direct and concise manner. It can also explain detailed information and data on the corporate website, and prepare separate reports that directly meet the needs of different stakeholders. | X | | | | | | Stakeholder Engagement | 68-73 |

| NO | PRINCIPAL | COMPLIANCE | | | | | EXPLANATIONS FOR THE PRINCIPALS THAT ARE NOT FULLY COMPLIANT | RELATED SECTION IN THE INTEGRATED REPORT OR OTHER SOURCES | PAGE NUMBER |
|--------------------------|--|------------|---------|----|----------|----------------|--|---|-------------|
| | | YES | PARTIAL | NO | EXEMPTED | NOT APPLICABLE | | | |
| 9 | It takes maximum care in terms of transparency and reliability. It objectively explains all kinds of developments about material issues in disclosures and reporting within the scope of the balanced approach. | X | | | | | | Materiality Analysis, https://surdurulebilirlik.garantibbva.com.tr/garanti-bbva-sustainability-approach/garanti-bbva-and-sustainability/responsible-and-transparent-governance/transparent-reporting/ | 60-67 |
| 10 | It gives information about which of the United Nations (UN) 2030 Sustainable Development Goals its activities are related to. | X | | | | | | Contribution to Sustainable Development Goals and Targets | 88-99 |
| 11 | Makes an explanation regarding the lawsuits filed and / or concluded against environmental, social and corporate governance issues. | X | | | | | | During the reporting period, there were no lawsuits filed and/or concluded against Garanti BBVA on environmental, social and corporate governance issues. | - |
| A4. VERIFICATION | | | | | | | | | |
| 12 | If verified by independent third parties (independent sustainability assurance providers), it discloses its sustainability performance measurements to the public and endeavors to increase such verification processes. | X | | | | | | Independent Auditor's Opinion and Assurance Reports | 206-210 |
| B. ENVIRONMENT | | | | | | | | | |
| Environmental Principles | | | | | | | | | |
| 13 | Explains policies and practices, action plans, environmental management systems (known by the ISO 14001 standard) and programs in the field of environmental management. | X | | | | | | Environmental Impact of Our Operations, https://surdurulebilirlik.garantibbva.com.tr/garanti-bbva-sustainability-approach/garanti-bbva-and-sustainability/environmental-impact-of-our-operations/environmental-management-system/ | 128 |
| 14 | Complies with environmental laws and other relevant regulations and explains them. | X | | | | | | https://surdurulebilirlik.garantibbva.com.tr/garanti-bbva-sustainability-approach/garanti-bbva-and-sustainability/environmental-impact-of-our-operations/environmental-management-system/ | - |

| NO | PRINCIPAL | COMPLIANCE | | | | | EXPLANATIONS FOR THE PRINCIPALS THAT ARE NOT FULLY COMPLIANT | RELATED SECTION IN THE INTEGRATED REPORT OR OTHER SOURCES | PAGE NUMBER |
|----|---|------------|---------|----|----------|----------------|--|--|----------------|
| | | YES | PARTIAL | NO | EXEMPTED | NOT APPLICABLE | | | |
| 15 | It explains the limitations of the environmental report to be included in the report to be prepared within the scope of the Sustainability Principles, reporting period, reporting date, data collection process and reporting conditions. | X | | | | | | About the Report | 4 |
| 16 | Describes the highest responsible person, relevant committees and responsibilities in the Company on the issues of environment and climate change. | X | | | | | | https://surdurulebilirlik.garantibbva.com.tr/garanti-bbva-sustainability-approach/garanti-bbva-and-sustainability/environmental-impact-of-our-operations/climate-change-management/ | - |
| 17 | Describes the incentives it offers for the management of environmental issues, including the achievement of objectives. | X | | | | | | https://surdurulebilirlik.garantibbva.com.tr/garanti-bbva-sustainability-approach/garanti-bbva-and-sustainability/other-esg-policies/environmental-and-social-loan-policies/ | - |
| 18 | Explain how environmental problems are integrated into business goals and strategies. | X | | | | | | Value Creation Process | 82-87 |
| 19 | It explains the sustainability performance of business processes or products and services and the activities to improve this performance. | X | | | | | | Operational Excellence - II | 158-165 |
| 20 | It explains how it manages environmental issues along the Company's value chain and integrates suppliers and customers into its strategies, not just in terms of direct operations. | X | | | | | | Value Creation Process, Sustainability | 82-87, 120-133 |
| 21 | Whether it is involved in policy-making processes on environmental issues (sectoral, regional, national and international); It explains the cooperation it has made with the associations, related organizations and non-governmental organizations it is a member of on the subject of environment, and the duties it has taken, if any, and the activities it supports. | X | | | | | | https://www.garantibbvainvestorrelations.com/en/sustainability/detail/Stakeholders-Engagement/867/3741/0 https://www.garantibbvainvestorrelations.com/en/sustainability/detail/Supported-Initiatives/864/3771/0 | - |

| NO | PRINCIPAL | COMPLIANCE | | | | | EXPLANATIONS FOR THE PRINCIPALS THAT ARE NOT FULLY COMPLIANT | RELATED SECTION IN THE INTEGRATED REPORT OR OTHER SOURCES | PAGE NUMBER |
|----|---|------------|---------|----|----------|----------------|--|---|-------------|
| | | YES | PARTIAL | NO | EXEMPTED | NOT APPLICABLE | | | |
| 22 | Reports information on its impacts in a periodically comparable manner within the scope of environmental indicators (Greenhouse gas emissions (Scope-1 (Direct), Scope-2 (Energy indirect), Scope-3 (Other indirect)), air quality, energy management, water and wastewater management, waste management, biodiversity impacts) | X | | | | | | Environmental Impact of Our Operations, https://www.garantibbvainvestorrelations.com/en/environment-social-governance/detail/Global-Eco-Efficiency-Plan-2021-25/1872/8565/0 | 128-130 |
| 23 | It describes the standard, protocol, methodology and base year details used to collect and calculate its data. | X | | | | | | Environmental Impact of Our Operations | 128 |
| 24 | Describes the status of environmental indicators for the reporting year (increase or decrease) in comparison with previous years. | X | | | | | | https://www.garantibbvainvestorrelations.com/en/environment-social-governance/detail/Global-Eco-Efficiency-Plan-2021-25/1872/8565/0 | - |
| 25 | Sets short and long-term goals to reduce their environmental impact and explains these goals. It is recommended that these goals be determined based on Science as suggested by the United Nations Conference of the Parties on Climate Change. If there is progress in the reporting year according to the targets set before, it provides information on the subject. | X | | | | | | Environmental Impact of Our Operations | 128 |
| 26 | Explain the strategy and actions to combat the climate crisis. | X | | | | | | https://surdurulebilirlik.garantibbva.com.tr/garanti-bbva-sustainability-approach/garanti-bbva-and-sustainability/environmental-impact-of-our-operations/climate-change-management/ | - |
| 27 | Describes the program or procedures to prevent or minimize the potential negative impact of the products and / or services it offers; explains the actions of third parties to reduce greenhouse gas emissions. | X | | | | | | Sustainability | 120-130 |

| NO | PRINCIPAL | COMPLIANCE | | | | | EXPLANATIONS FOR THE PRINCIPALS THAT ARE NOT FULLY COMPLIANT | RELATED SECTION IN THE INTEGRATED REPORT OR OTHER SOURCES | PAGE NUMBER |
|----|--|------------|---------|----|----------|----------------|--|---|-------------|
| | | YES | PARTIAL | NO | EXEMPTED | NOT APPLICABLE | | | |
| 28 | It explains the actions taken to reduce its environmental impacts, the total number of projects and initiatives carried out, and the environmental benefits / revenues and cost savings they provide. | | X | | | | Every year, Garanti BBVA discloses the actions it takes within the scope of its environmental and social credit policy, the total number of projects and initiatives it carries out, in the Environmental and Social Impact Assessment System table. | Garanti BBVA annually discloses the actions it takes within the scope of its environmental and social credit policy, the total number of projects and initiatives it carries out, in the Environmental and Social Impact Assessment System table. | |
| 29 | It reports the total energy consumption data (excluding raw materials) and explains the energy consumption as Scope-1 and Scope-2. | X | | | | | | https://www.garantibbvainvestorrelations.com/en/environment-social-governance/detail/Global-Eco-Efficiency-Plan-2021-25/1872/8565/0 | - |
| 30 | Provides information on electricity, heat, steam and cooling generated and consumed in the reporting year. | X | | | | | | https://www.garantibbvainvestorrelations.com/en/environment-social-governance/detail/Global-Eco-Efficiency-Plan-2021-25/1872/8565/0 | - |
| 31 | It conducts studies on increasing the use of renewable energy, transition to zero or low carbon electricity and explains these studies. | X | | | | | | Sustainability | 120-130 |
| 32 | Explain the renewable energy production and usage data. | X | | | | | | Environmental Impact of Our Operations | 128 |
| 33 | It makes energy efficiency projects and explains the amount of energy consumption and emission reduction thanks to these studies. | X | | | | | | Environmental Impact of Our Operations | 128 |
| 34 | It reports the amount of water withdrawn, used, recycled and discharged from underground or above ground, its sources and procedures (Total water withdrawal by source, water resources affected by water withdrawal; percentage and total volume of recycled and reused water, etc.). | X | | | | | | Appendix A.3, https://www.garantibbvainvestorrelations.com/en/images/pdf/GEP-IR-Website_07092021.pdf https://www.garantibbvainvestorrelations.com/en/images/pdf/Water-2021.pdf | |

| NO | PRINCIPAL | COMPLIANCE | | | | | EXPLANATIONS FOR THE PRINCIPALS THAT ARE NOT FULLY COMPLIANT | RELATED SECTION IN THE INTEGRATED REPORT OR OTHER SOURCES | PAGE NUMBER |
|--------------------------------------|---|------------|---------|----|----------|----------------|--|---|-------------|
| | | YES | PARTIAL | NO | EXEMPTED | NOT APPLICABLE | | | |
| 35 | It explains whether operations or activities are included in any carbon pricing system (Emission Trading System, Cap & Trade or Carbon Tax). | X | | | | | | Financing the Transition to a Low Carbon Economy | 126-127 |
| 36 | Describes the carbon credit information accumulated or purchased during the reporting period. | X | | | | | | Appendix A5 | |
| 37 | Explains the details if carbon pricing is applied within the Company. | X | | | | | | https://surdurulebilirlik.garantibbva.com.tr/garanti-bbva-sustainability-approach/garanti-bbva-and-sustainability/other-esg-policies/climate-change-action-plan-declaration/ | - |
| 38 | It explains all mandatory and voluntary platforms where it discloses environmental information. | X | | | | | | https://surdurulebilirlik.garantibbva.com.tr/library-resources/ | - |
| C. SOCIAL | | | | | | | | | |
| C1. Human Rights and Employee Rights | | | | | | | | | |
| 39 | Forms a Human Rights and Employee Rights Policy with a commitment to fully comply with the Universal Declaration of Human Rights, ILO Conventions which Turkey has confirmed and the legal framework and regulations governing the operation of corporate life in Turkey. Discloses the policy in question and the roles and responsibilities associated with its implementation. | X | | | | | | https://surdurulebilirlik.garantibbva.com.tr/garanti-bbva-sustainability-approach/garanti-bbva-and-sustainability/other-esg-policies/declaration-of-human-rights/ | - |
| 40 | Provides equal opportunity in recruitment processes. Considering the supply and value chain effects, it includes fair labor, improvement of labor standards, women's employment and inclusion issues (such as women, men, religious belief, language, race, ethnic origin, age, disability, refugee, etc.) in its policies. | X | | | | | | The Best and Most Engaged Team | 168-177 |

| NO | PRINCIPAL | COMPLIANCE | | | | | EXPLANATIONS FOR THE PRINCIPALS THAT ARE NOT FULLY COMPLIANT | RELATED SECTION IN THE INTEGRATED REPORT OR OTHER SOURCES | PAGE NUMBER |
|----|---|------------|---------|----|----------|----------------|--|--|--------------|
| | | YES | PARTIAL | NO | EXEMPTED | NOT APPLICABLE | | | |
| 41 | Describes the measures taken along the value chain for the protection of groups sensitive to certain economic, environmental, social factors (low-income groups, women, etc.) or minority rights / equality of opportunity. | X | | | | | | Stakeholder Engagement, Supporting Entrepreneurship | 70-73, 78-79 |
| 42 | It reports developments regarding discrimination, inequality, human rights violations, forced labor, and corrective practices. Explains the regulations against child labor. | X | | | | | | Equal Opportunity and Diversity, https://surdurulebilirlik.garantibbva.com.tr/garanti-bbva-sustainability-approach/garanti-bbva-and-sustainability/other-esg-policies/declaration-of-human-rights/ | 175-176 |
| 43 | Explains policies regarding investment in employees (training, development policies), compensation, vested benefits, right to unionize, work / life balance solutions and talent management. Determines dispute resolution processes by creating mechanisms for employee complaints and dispute resolution. It regularly explains the activities carried out to ensure employee satisfaction. | X | | | | | | https://www.garantibbva.com.tr/en/our_company/human_resources/human_resources_policies.page | - |
| 44 | It creates occupational health and safety policies and makes them public. Explains the precautions and accident statistics taken to prevent work accidents and health. | X | | | | | | https://surdurulebilirlik.garantibbva.com.tr/garanti-bbva-sustainability-approach/material-issues/environmental-and-social-risk-management/ | - |
| 45 | It creates and publicly discloses personal data protection and data security policies. | X | | | | | | https://www.garantibbva.com.tr/en/protection-of-personal-data.page https://www.garantibbva.com.tr/en/personal_banking/delivery_channels/internet_banking/security/privacy_and_confidentiality_policy.page | - |

| NO | PRINCIPAL | COMPLIANCE | | | | | EXPLANATIONS FOR THE PRINCIPALS THAT ARE NOT FULLY COMPLIANT | RELATED SECTION IN THE INTEGRATED REPORT OR OTHER SOURCES | PAGE NUMBER |
|---|---|------------|---------|----|----------|----------------|--|---|-------------|
| | | YES | PARTIAL | NO | EXEMPTED | NOT APPLICABLE | | | |
| 46 | It creates an ethical policy (including work, work ethics, compliance processes, advertising and marketing ethics, open information, etc.) and discloses it to the public. | X | | | | | | https://surdurulebilirlik.garantibbva.com.tr/garanti-bbva-sustainability-approach/garanti-bbva-and-sustainability/other-esg-policies/ethics-and-integrity-principles/ | - |
| 47 | Explains the work within the scope of social investment, social responsibility, financial inclusion and access to finance. | X | | | | | | Sustainability | 120-133 |
| 48 | Organizes information meetings and training programs for employees on ESG policies and practices. | X | | | | | | https://surdurulebilirlik.garantibbva.com.tr/garanti-bbva-sustainability-approach/material-issues/the-best-and-most-engaged-team/learning-and-development/ | - |
| C2. Stakeholders, International Standards and Initiatives | | | | | | | | | |
| 49 | It carries out its activities in the field of sustainability by taking into account the needs and priorities of all stakeholders (employees, customers, suppliers and service providers, public institutions, shareholders, society and non-governmental organizations, etc.). | X | | | | | | Stakeholder Engagement | 70-73 |
| 50 | It regulates and publicly discloses a customer satisfaction policy regarding the management and resolution of customer complaints. | X | | | | | | Reaching More Customers, https://www.garantibbva.com.tr/tr/musteri-deneyimi-destek.page | 136-138 |
| 51 | Conducts stakeholder communication continuously and transparently; It explains which stakeholders, for what purpose, on what issue and how often it communicated, and the developments in sustainability activities. | X | | | | | | Stakeholder Engagement, https://www.garantibbvainvestorrelations.com/en/sustainability/detail/Stakeholders-Engagement/867/3741/0 | 70-73 |
| 52 | It publicly discloses the international reporting standards it has adopted (Carbon Disclosure Project (CDP), Global Reporting Initiative (GRI), International Integrated Reporting Council (IIRC), Sustainability Accounting Standards Board (SASB), Climate-Related Financial Disclosures Task Force (TCFD), etc.).Standards Board (SASB), Climate-Related Financial Disclosures Task Force (TCFD), etc.). | X | | | | | | About the Report, https://surdurulebilirlik.garantibbva.com.tr/surdurulebilirlik-yaklasimimiz/garanti-bbva-ve-surdurulebilirlik/sorumlu-ve-seffaf-yonetim/seffaf-raporlama/ | 4 |

| NO | PRINCIPAL | COMPLIANCE | | | | | EXPLANATIONS FOR THE PRINCIPALS THAT ARE NOT FULLY COMPLIANT | RELATED SECTION IN THE INTEGRATED REPORT OR OTHER SOURCES | PAGE NUMBER |
|---------------------------------|---|------------|---------|----|----------|----------------|--|---|-------------|
| | | YES | PARTIAL | NO | EXEMPTED | NOT APPLICABLE | | | |
| 53 | Discloses the international organizations or principles (Equator Principles, United Nations Environment Program Finance Initiative (UNEP-FI), United Nations Global Principles (UNGC), United Nations Principles for Responsible Investment (UNPRI) etc.) which it is a signatory or member of, and international principles adopted (International Capital Market Association (ICMA) Green / Sustainable Bond Principles). | X | | | | | | About the Report, Society | 4, 71 |
| 54 | It makes concrete efforts to be included in Borsa Istanbul Sustainability Index and international sustainability indices (Dow Jones Sustainability Index, FTSE4Good, MSCI ESG Indices, etc.). | X | | | | | | Garanti BBVA Share | 42-44 |
| D. CORPORATE GOVERNANCE | | | | | | | | | |
| Corporate Governance Principles | | | | | | | | | |
| 55 | It makes maximum effort to comply with all Corporate Governance principles as well as the mandatory Corporate Governance principles within the scope of the Capital Markets Board Corporate Governance Communiqué numbered II-17.1. | X | | | | | | Statements of Responsibility | 211 |
| 56 | It takes into account the sustainability issue, the environmental impacts of its activities and the principles in this regard while determining its corporate management strategy | X | | | | | | Our Governance | 48 |
| 57 | As stated in the Corporate Governance Principles, it takes the necessary measures to comply with the principles regarding the stakeholders and to strengthen the communication with the stakeholders. It applies to the opinions of stakeholders in determining the measures and strategies in the field of sustainability. | X | | | | | | Materiality Analysis | 60-62 |

| NO | PRINCIPAL | COMPLIANCE | | | | | EXPLANATIONS FOR THE PRINCIPALS THAT ARE NOT FULLY COMPLIANT | RELATED SECTION IN THE INTEGRATED REPORT OR OTHER SOURCES | PAGE NUMBER |
|----|---|------------|---------|----|----------|----------------|--|--|-------------|
| | | YES | PARTIAL | NO | EXEMPTED | NOT APPLICABLE | | | |
| 58 | It works on raising awareness on the issue of sustainability and its importance through social responsibility projects, awareness activities and trainings. | X | | | | | | https://www.garantibbvainvestorrelations.com/en/environment-social-governance/detail/Submission-for-Approval-of-the-Corporate-Social-Responsibility-Policy/1875/8576/0 | - |
| 59 | It strives to become a member of international standards and initiatives on sustainability and to contribute to studies. | X | | | | | | https://www.garantibbvainvestorrelations.com/en/sustainability/detail/Supported-Initiatives/864/3771/0 | - |
| 60 | Explains policies and programs for the fight against bribery and corruption and the principle of tax integrity. | X | | | | | | https://surdurulebilirlik.garantibbva.com.tr/garanti-bbva-sustainability-approach/garanti-bbva-and-sustainability/other-esg-policies/ethics-and-integrity-principles/ https://surdurulebilirlik.garantibbva.com.tr/garanti-bbva-sustainability-approach/garanti-bbva-and-sustainability/other-esg-policies/anti-money-laundering-policy/ | - |