KREDİ KAYIT BÜROSU

2025 SUSTAINABILITY REPORT

Power to Data, Value for the Future

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ABOUT THE REPORT

The 2025 Sustainability Report is the sixth sustainability report published by the Kredi Kayıt Bürosu (KKB). First released to the public in 2020, KKB's sustainability reports constitute an important part of the organization's commitment to transparency and accountability.

This report aims to present KKB's environmental, social and governance (ESG) performance, sustainability strategy, and the value it creates for its stakeholders through a holistic approach. The 2025 report is built around the theme **"Power to Data, Value for the Future"**, presenting a compelling narrative that explores KKB's data-driven business model and its impact on the financial system, society and the environment.

KKB's sustainability approach was reassessed in 2025 for the first time in line with the double materiality methodology. Under this approach, sustainability topics were evaluated by considering both their impacts on KKB's financial performance, risk profile and business continuity, and KKB's impacts on society, the financial system and the environment. Material topics were streamlined based on their areas of impact and grouped under strategic sustainability focus areas.

Accordingly, the report is structured around the following strategic sustainability focus areas:

- Power to Data: Secure and Responsible Data Management
- Value for Financial Life: Inclusion and the Ecosystem
- Value for the Future: Climate and Sustainable Finance Transformation
- Protecting Value: Risk Management and Governance
- Value for Society: People and Organization

Cross-cutting topics, such as operational sustainability, are addressed under the relevant focus areas through a holistic approach.

Considering the impacts of climate change on the financial system, KKB continues its efforts to identify and manage climate-related risks and opportunities. Accordingly, this report addresses climate change not only in terms of its operational impacts but also through its indirect effects on the financial system.

Climate-related risks and opportunities have been assessed, and KKB's potential transition risks, physical risks and opportunities in the field of sustainable finance have been analysed in the context of its operations.

This report has been prepared in accordance with the GRI Sustainability Reporting Standards and covers the period from 1 January to 31 December 2025.

We welcome your comments and suggestions regarding this report. You may contact us at **info@kkb.com.tr** or through the contact form available on KKB's corporate website.

MESSAGE FROM THE CHAIRPERSON

Dear stakeholders,

For over 30 years, Kredi Kayıt Bürosu (KKB) has been strengthening trust — one of the most valuable elements of the financial system — by providing data-driven solutions that contribute to our country's economic development. Today, we are building on this strong legacy by embracing our responsibility to help create a more resilient and sustainable future in environmental, social and governance areas.

To us, sustainability is not just a way of adapting to changing circumstances, but a fundamental management approach that supports our organisation's long-term success. Shaped by the principles of trust, transparency, responsibility and a long-term perspective, this approach is an integral part of our corporate culture and way of doing business. It guides our decisions, investments and relationships with our stakeholders. We believe that creating lasting value requires not only responding to today's needs, but also making investments that anticipate the future and continuously strengthen trust for all our stakeholders.

2025 was a year in which global economic uncertainties, technological transformation and sustainability expectations became increasingly prominent. In such an environment, we continued to support the reliability of the financial system and create value for our members and business partners by leveraging our robust data infrastructure, analytical capabilities, and technology-driven vision. At the same time, we advanced our contribution to our country's digital transformation by investing in solutions that address future needs today.

Our technology investments are the strongest reflection of our future-oriented vision. Through investments such as the Anadolu Data Centre Phase 2 project and the Kloudeks ecosystem, we have contributed to the development of secure, high-performance, locally developed technology infrastructures, while further strengthening our capabilities in artificial intelligence and cloud technologies. We have continued to develop solutions that generate meaningful insights from data, support effective decision-making mechanisms, and enhance trust across the financial ecosystem.

Another important aspect of our approach to sustainability is our commitment to environmental and social responsibility. While continuing to reduce the environmental impact of our operations, we prioritise contributing to economic and social development through our inclusive financial solutions. By supporting employee development, promoting diversity and fostering equal opportunities, we are carrying our strong corporate culture into the future. In line with our ethical values and corporate governance approach, we conduct all our activities based on the principles of transparency and accountability.

Sustainable success can only be achieved through strong collaborations. With this in mind, we continue to develop joint projects with our members, business partners, public institutions and sector stakeholders that contribute to the advancement of the financial system, while promoting knowledge sharing and collective intelligence. We believe that strong, trust-based collaborations are fundamental to creating lasting value.

We will continue to build on our legacy of trust through investments centred on technology, data and sustainability. While contributing to the development of the financial system with our innovative solutions and perspective, we remain determined to create value for our country's digital transformation and development, in line with our environmental, social and governance responsibilities.

I would like to thank our dedicated colleagues, our trusting members, our business partners and all our stakeholders for their continued support throughout this journey.

Yours sincerely,

Nursezil Küçük Koçak
Chairperson of the Board

MESSAGE FROM THE GENERAL MANAGER

We do not consider sustainability to be a separate area of our operations; rather, we see it as a fundamental element of our entire business model, from technology investments and product development processes to data management and human resources.

Dear Stakeholders,

In 2025, the business world experienced a period of accelerated transformation, driven by technology, data and artificial intelligence applications. At the same time, sustainability emerged as a pivotal factor influencing not only organisations' environmental and social responsibilities but also their long-term competitiveness. At Kredi Kayıt Bürosu (KKB), we continued our efforts with the ambition of not only following this transformation, but also leading the sector through the solutions we develop.

We do not consider sustainability to be a separate area of our operations; rather, we see it as a fundamental element of our entire business model, from technology investments and product development processes to data management and human resources. In line with this approach, our sixth sustainability report assesses our activities in terms of their environmental, social and governance impacts, and sets out our priorities from a holistic perspective. While presenting the value we create for our stakeholders in a more comprehensive manner, we have also addressed our responsibilities towards the future with the same commitment to transparency.

In 2025, we focused on further advancing our strong capabilities in data and technology by making investments that create sustainable value. As part of this, we laid the foundations for the KKB Anadolu Data Centre Phase 2 investment, with the aim of not only increasing our service capacity, but also establishing a robust and secure ecosystem that will contribute to our country's digital infrastructure in the long term. We believe that this investment, which was designed to be energy efficient and to offer high operational continuity and strong infrastructure capabilities, will make a significant contribution to the growing data processing and artificial intelligence needs of the financial sector.

We further strengthened our technology investments through Kloudeks, our locally developed, secure cloud platform. By enhancing our infrastructure to enable data to be stored securely within our country's borders, we have supported institutions in accessing cloud technologies and artificial intelligence applications securely and scalably. Our central GPU infrastructure and large language model solutions enabled institutions to develop new capabilities to facilitate their artificial intelligence development and implementation processes.

MESSAGE FROM THE GENERAL MANAGER

At the same time, we have further strengthened the digital trust environment by enhancing our compliance with international information security and data privacy standards, as evidenced by our ISO/IEC 27701 and ISO/IEC 27017 certifications.

As an organisation that manages, interprets and transforms data into value, our approach has enabled us to support decision-making processes by providing analytical solutions and next-generation scoring models that address the needs of the financial system. Our aim is to provide our members with faster, more reliable and more effective solutions. Through the innovations introduced under the Findeks brand, we have given individuals easier access to financial information, increased our digital reach and broadened our financial inclusion practices.

We have extended our long-standing data and analytical expertise within the financial system to the field of sustainability.

Our Greendeks platform has established a data-driven framework to help businesses measure their sustainability performance, identify areas for improvement, and access green finance opportunities more easily. Our commitment to supporting the transformation of the real sector is also reflected in the Green Transformation Protocol in Industry, which we signed with the Ministry of Environment, Urbanisation and Climate Change. By extending the trust we have built within the financial system to sustainable development, we continue to support businesses on their transformational journeys.

Environmental responsibility is an important part of our approach to sustainability. As of 2025, we have been meeting 100% of the electricity consumption at our head office building and KKB Anadolu data centre through I-REC-certified renewable energy sources. While making a significant contribution to reducing our carbon emissions, we have continued to improve our energy efficiency and resource utilisation practices.

Through our water efficiency and waste management initiatives, we have expanded practices that support the more effective use of natural resources.

At the heart of this transformation are our people. By supporting employee development, promoting inclusion, and strengthening a high-performance culture, we have been recognised on the Great Place to Work 'Türkiye's Best Employers 2025' list. We continue to enhance our strong corporate culture by focusing on the employee experience and investing in future capabilities.

Every achievement we have made is the result of our robust technology infrastructure, reliable data ecosystem, innovative mindset and collaborative working culture. In the coming period, we will continue to contribute to the development of the financial system with the same determination, creating sustainable value and building trust among our stakeholders by combining the power of data with technology.

In line with our sustainability vision, I would like to thank all our colleagues, members, business partners and the Board of Directors, with whom we create value. I sincerely believe that we will continue to build a stronger future together.

Yours sincerely,

Gökhan Şahin
Member of the Board of Directors and General Manager

KKB AT A GLANCE

KKB AT A GLANCE

Founded in 1995 through the partnership of nine banks, KKB is a strategic institution providing the trusted data infrastructure underpinning Türkiye's financial ecosystem. As of 31 December 2025, KKB serves

207

members.

Pursuant to Article 73(4) of Banking Law No. 5411, KKB was established to facilitate the exchange of all types of information and documents through a company founded by at least five banks. Since April 1999, member institutions of KKB have been sharing their customers' credit information with one another.

With the enactment of Law No. 6111, Additional Article 1 of Banking Law No. 5411 established the Risk Centre (RM) within the Banks Association of Türkiye (TBB).

The Risk Centre (RM) has been established to collect the risk information of customers of credit institutions and other financial institutions approved by the Banking Regulation and Supervision Agency (BDDK), and to share such information with these institutions, as well as with the relevant natural or legal persons themselves or, subject to their consent, with private legal entities and third-party individuals. KKB plays an active role in the operation of this system through its technical infrastructure, operational processes and data management capabilities.

Operating with a focus on technology, data security and sustainability, KKB contributes to the sound functioning of the financial system through its highly secure infrastructure, business continuity capabilities and innovative approach. Through its R&D Centre, KKB also supports university–industry collaboration and pioneers the development of innovative local solutions.

As of the end of 2025, KKB continues to develop solutions that reduce uncertainty in financial life and transform data into secure and sustainable value, supported by its expert workforce of 696 employees and strong corporate structure.

Through its collaborations and consultancy activities with international credit bureaus, KKB shares its expertise on a global scale while continuing to create value for Türkiye through initiatives carried out with a strong sense of social responsibility.

KKB AT A GLANCE

VISION

To become the trusted data hub in credit bureau services, empowering institutions' decision-making through advanced technology and new data sources.

MISSION

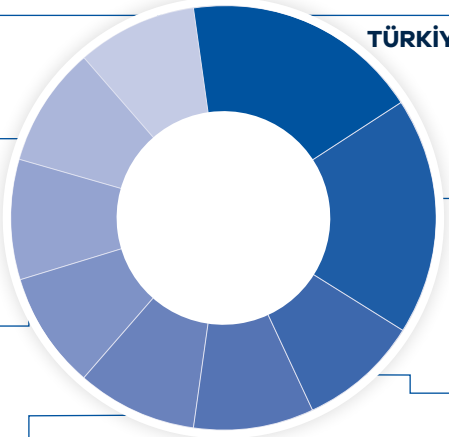
To create value for the financial system through data and technology.

OUR STRATEGIC FOCUS AREAS

- Artificial Intelligence Adaptation
- New Data Sources
- Talent
- Data Centre Operations

KKB AT A GLANCE

SHAREHOLDING STRUCTURE



AKBANK T.A.Ş. 9.09%

TÜRKİYE İŞ BANKASI A.Ş. 9.09%

T.C. ZİRAAT BANKASI A.Ş. 9.09%

T.C. VAKIFLAR BANKASI T.A.O. 9.09%

DENİZBANK A.Ş. 9.09%

TÜRKİYE HALK BANKASI A.Ş. 18.18%

YAPI VE KREDİ BANKASI A.Ş. 18.18%

TÜRKİYE GARANTİ BANKASI A.Ş. 9.09%

ŞEKERBANK T.A.Ş. 9.09%

MEMBERS

Banks 68

Factoring Companies 49

Financial Leasing Companies 21

Consumer Financing Companies 25

Asset Management Companies 27

Insurance Companies 9

Other 8

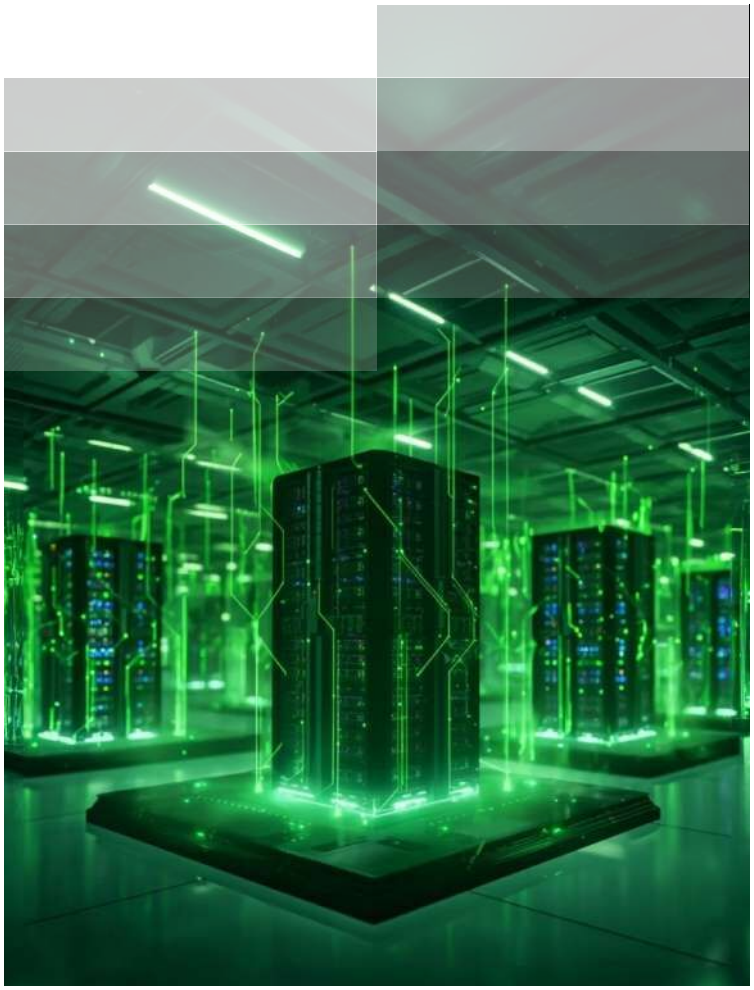
TOTAL MEMBERS 207*

* As of 31 December 2025, the number of KKB members is 192 and this figure identifies the members who are served through the Risk Centre (RM)

KKB AT A GLANCE

HIGHLIGHTS FOR 2025

- The foundation was laid for the KKB Anadolu Data Centre Phase 2 project.
- The locally developed and secure cloud infrastructure Kloudeks was launched.
- KKB was recognized as one of the "Türkiye's Best Employers 2025" by Great Place to Work.
- The Greendeks platform was launched.
- The "Green Transformation Protocol in Industry" was signed with the Ministry of Environment, Urbanization and Climate Change.
- As a result of work carried out in the fields of Personal Data Management and Information Security Management Systems for Cloud Services, the organisation has been awarded ISO 27701 and ISO 27017 certifications.
- The First Payment Score, which measures the risk of non-payment from the first instalment in consumer loan applications, was launched.
- The design process carried out within the scope of the KKB Anadolu Data Centre Phase 2 project was internationally certified with the TS EN 50600 Data Centre Design Certification.
- The Mercek service was launched.
- New versions of the TKN and TBE products, developed using KKB resources, were implemented.
- The Findeks mobile application and website were fully renewed to enhance user experience.
- TSP Score and Roof Models were launched.
- Cheque notification infrastructures were enhanced with modern technology, and the Cheque Deduplication Project was launched.
- The electricity consumed at the Head Office building and KKB Anadolu Data Centre was fully supplied from renewable energy sources certified with I-REC.
- Water recovery from the adiabatic systems at the KKB Anadolu Data Centre was achieved, increasing operational water efficiency.
- To reduce single-use plastic consumption, the use of plastic bottles was limited and water purification dispensers were introduced in offices.



SUSTAINABILITY STRATEGY AND MANAGEMENT

KKB'S APPROACH TO SUSTAINABILITY

Kredi Kayıt Bürosu (KKB) views sustainability not merely as the management of environmental impacts, but as a holistic approach that supports the reliability, inclusivity, and long-term resilience of the financial system. In this context, sustainability is positioned as a value area directly linked to KKB's data-driven business model.

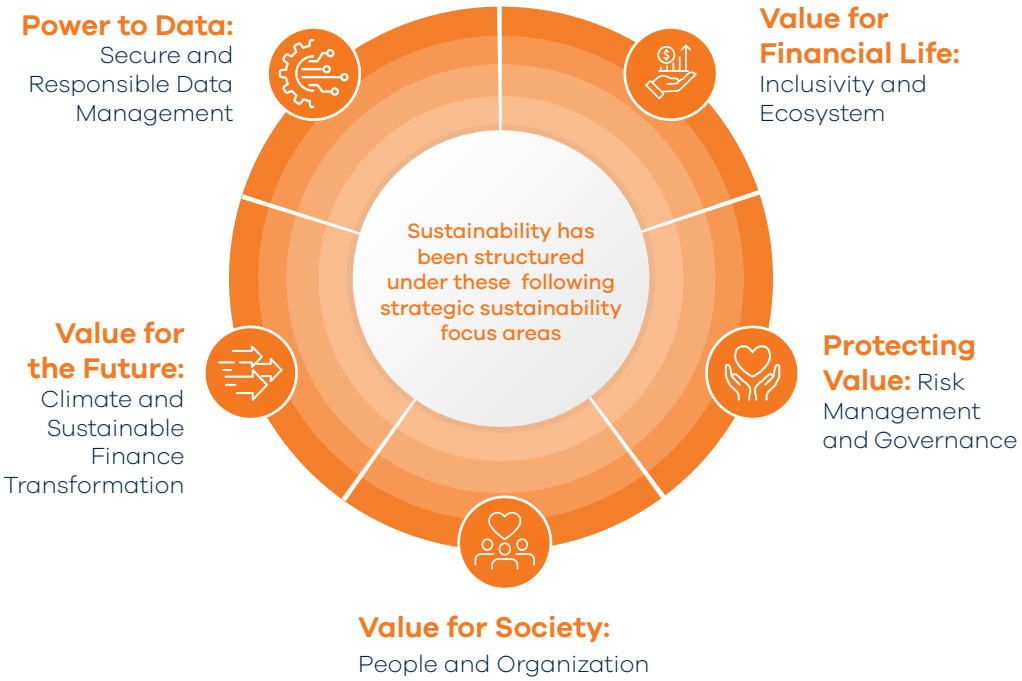
In 2025, KKB's sustainability approach was centred on the theme "Power to Data, Value for the Future." This approach demonstrates that data is not merely an operational element but a cornerstone of trust, financial inclusion, and sustainable transformation.

Strategic Sustainability Approach

KKB's sustainability strategy has been strengthened by the "double materiality" approach, which was implemented as of 2025. Accordingly, sustainability issues are evaluated and prioritized by considering their impact on:

- KKB's financial performance, risk profile, and business continuity
- society, the financial system, and the environment.

As a result of this approach, sustainability has been structured under the following strategic sustainability focus areas:



Cross-cutting issues (operational efficiency, occupational health and safety, supply chain, etc.) are addressed through a holistic approach under the relevant focus areas.

Core Principles of the Sustainability Strategy

KKB's sustainability strategy is built on the following core principles:

- **Focus on material issues:** Directing sustainability efforts toward areas of highest impact and risk
- **Data-driven impact management:** Effective use of data analytics—KKB's core competency—in the sustainability domain
- **Integration with governance:** Integrating sustainability issues into corporate governance and risk management processes
- **Goal and performance orientation:** Monitoring strategic goals through measurable KPIs

KKB'S APPROACH TO SUSTAINABILITY

Strategic Initiatives

KKB integrates its sustainability strategy into all business processes, from product development to operational activities. In this context:

- Data security, privacy, and ethical data management are treated as key priorities that support the reliability of the financial system.
- Access to the financial system for individuals and businesses is strengthened through products and services that support financial inclusion.
- In the context of climate change, the goals include improving energy efficiency, reducing carbon emissions and using renewable energy.
- Data-driven solutions such as Greendeks are used to measure businesses' ESG performance and support their access to sustainable financing.
- Climate-related risks and opportunities are analysed and integrated into risk management processes.

Governance and Monitoring Mechanism

KKB's sustainability strategy is managed in an integrated manner with its corporate governance structure.

- Strategic goals are set using the Objectives and Key Results (OKR) methodology and are reviewed regularly.
- Performance indicators are monitored through digital KPI dashboards.
- Sustainability performance is regularly evaluated by senior management and relevant committees.
- Environmental targets are tracked under the ISO 14001 Environmental Management System with results discussed at Management Review meetings.

KKB's management systems are supported by ISO standards, including ISO 14001, ISO/IEC 27001, ISO/IEC 27701, ISO 27017, ISO 20000 and ISO 22301. The KKB Anadolu Data Centre is LEED Platinum certified.

The OKR methodology is used to integrate sustainability goals into the performance objectives — and consequently into compensation policies — of senior management (the CEO and relevant Executive Vice Presidents). This methodology is also used in corporate performance management. Progress towards these goals is reviewed strategically by the Sustainability Committee at least once every six months and the results are reported to senior management. Final oversight is provided by the board of directors.

Future Priorities

In line with its sustainability strategy, KKB will focus on the following in the coming period:

- Increasing investments in renewable energy
- Strengthening energy and emissions management
- Expanding the scope of the Greendeks product
- Promoting green finance and sustainable data solutions
- Raising sustainability awareness among employees.

Through its sustainability strategy, KKB aims to manage its operational impact and contribute to the sustainable transformation of the financial system by leveraging its data and analytical capabilities. In line with this approach, KKB considers trust-based value creation to be a long-term strategic priority.

MATERIALITY APPROACH

When setting its sustainability priorities, Kredi Kayıt Bürosu (KKB) considers the financial impact of the issues on the organisation, as well as their wider societal, financial and environmental impact. As of 2025, KKB has updated its materiality approach in line with the 'double materiality' methodology.

This approach ensures that sustainability issues are evaluated along two key axes:

- **Impact Materiality:** The impact of KKB's activities on society, the financial system, and the environment
- **Financial Materiality:** The impact of sustainability issues on KKB's financial performance, risk profile, and long-term value creation capacity

In this context, KKB addresses sustainability issues from both an operational perspective and in light of their systemic effects on the financial system, in line with its data-driven business model.

Methodology

The double materiality analysis was conducted using a multi-stakeholder, data-driven approach.

1. **Issue Identification:** Sustainability issues were identified by considering reports from previous years, sectoral analyses, international standards, and KKB's areas of operation.
2. **Evaluation Criteria:** Each issue was evaluated based on the following criteria:

Impact Materiality:

- Magnitude and scope of the impact
- Number of affected stakeholders
- Impact on the financial system
- Reversibility

Financial Materiality:

- Regulatory and compliance risk
- Reputational risk
- Impact on operational continuity
- Impact on the business model and revenue

Stakeholder Engagement

During the analysis process, the views of shareholders, members, customers, employees and other stakeholder groups were taken into account. Existing stakeholder analyses and feedback were also incorporated into the evaluation process.

Identification of Material Issues

As a result of the analysis, sustainability issues were streamlined according to similar impact areas and grouped under strategic sustainability focus areas.

Accordingly, KKB's material sustainability topics have been determined as follows:

- Data Security and Responsible Data Management
- Value for Financial Life
- Climate and Sustainable Finance Transformation
- Risk Management and Corporate Governance
- People and Organization
- Operational Sustainability

Cross-cutting issues such as operational sustainability are addressed through a holistic approach under the relevant focus areas.

Double Materiality Matrix

As a result of the analysis conducted:

- Data security and financial inclusion emerged as the most critical priority areas for KKB, in terms of both its financial performance and its impact on the financial system.
- Climate change and sustainable finance are positioned as strategic priority areas due to KKB's growing impact through its Data Centre operations and the data-driven solutions it develops.
- Risk management and governance are among the issues with high financial priority in terms of KKB's operational continuity and reliability.
- The topics addressed under the "People and Organization" heading support KKB's social impact.

MATERIALITY APPROACH

Link to the Sustainability Strategy

The results of the double-materiality analysis form the foundation of KKB's sustainability strategy. The priority topics identified through this analysis form the main structure of the report:

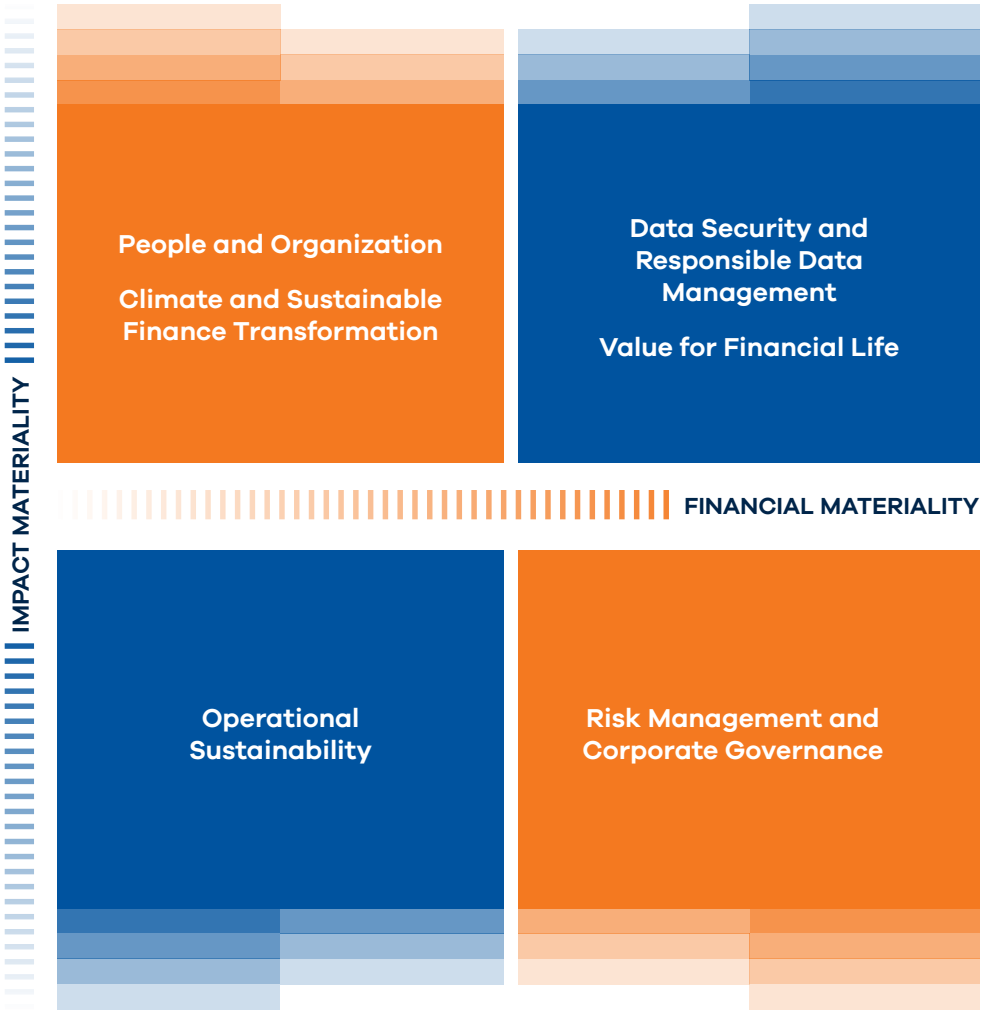
- Power to Data
- Value for Financial Life
- Value for the Future
- Protecting Value
- Value for Society;

KKB's sustainability approach is presented holistically within this framework.

Using a double-materiality approach, KKB addresses sustainability issues from a strategic perspective, leveraging its data and analytical capabilities to manage its own operational impacts and contribute to the sustainable transformation of the financial system.

Double-Materiality Matrix

KKB's sustainability priorities were determined by jointly evaluating the financial impacts of its activities alongside their effects on society, the financial system, and the environment. The double materiality matrix developed in this context outlines the institution's strategic sustainability focus areas. While data security and financial inclusion lie at the core of KKB's sustainability approach, climate change and the sustainable transformation of finance are emerging as strategic priority areas due to their growing impact. Cross-cutting issues, such as operational sustainability, are addressed through a holistic approach under the relevant priority areas.



OUR STRATEGIC SUSTAINABILITY FOCUS AREAS

POWER TO DATA

For KKB, data security and responsible data management are fundamental elements that ensure the reliability of the financial system. In line with its data-driven business model, the secure and ethical use of data is at the heart of sustainable value creation.

PROTECTING VALUE

KKB ensures sustainable value creation through its strong governance structure and effective risk management approach. This structure is one of the key elements supporting the institution's reliability and business continuity.

VALUE FOR FINANCIAL LIFE

Through the data and analytics solutions it has developed, KKB contributes to the creation of a more inclusive and transparent structure by increasing access to the financial system. This approach aims to empower individuals and businesses in their financial decision-making processes.

VALUE FOR THE FUTURE

KKB supports the fight against climate change and the transition to sustainable finance through data-driven solutions. In this context, it manages its operational impacts while contributing to the transformation of the financial system.

VALUE FOR SOCIETY

In line with its people-centred approach, KKB aims to create social value while supporting the development of its employees. In this context, an inclusive work environment and areas of sustainable social impact are prioritized.

SUSTAINABILITY FOCUS AREAS AND CONTRIBUTIONS TO THE SUSTAINABLE DEVELOPMENT GOALS

Focus Area	Scope	Significance for KKB	SDGs Contributed To
Power to Data: Secure and Responsible Data Management	Data security, privacy, ethics, compliance	Ensuring a reliable data infrastructure for the financial system	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE; 16 PEACE, JUSTICE AND STRONG INSTITUTIONS
Value for Financial Life: Inclusion and Ecosystem	Financial inclusion, Findeks, customer experience	Improving financial access and decision-making quality	8 DECENT WORK AND ECONOMIC GROWTH; 10 REDUCED INEQUALITIES
Value for the Future: Climate and Sustainable Finance	Climate, energy, Data Centre, Greendeks	Supporting the climate transition with data	7 AFFORDABLE AND CLEAN ENERGY; 13 CLIMATE ACTION
Protecting Value: Risk and Governance	Risk management, governance, compliance	Ensuring business continuity and trust	16 PEACE, JUSTICE AND STRONG INSTITUTIONS
Value for Society: People and Organization	Employees, diversity, training, occupational health and safety	Creating people-centred value	4 QUALITY EDUCATION; 5 GENDER EQUALITY; 8 DECENT WORK AND ECONOMIC GROWTH

OUR VALUE CREATION APPROACH WITH OUR STAKEHOLDERS

KKB approaches its relationships with stakeholders not merely as communication processes, but in line with an approach centred on mutual value creation. In this context, stakeholder interactions are structured in accordance with the objectives of trust, transparency, and sustainable value creation.

Stakeholder Group	Purpose of Interaction	Value Created	Communication Channels
Shareholders	Transparency and sharing of financial performance	Sustainable growth and trust	Annual general meeting, reports
KKB Management	Strategic decision-making and governance	Management of corporate sustainability	Board of Directors and committee meetings
Employees	Engagement and development	Strong organizational culture and competent human resources	Internal communication, surveys
Members	Collaboration and data sharing	Reliable infrastructure in the financial system	Digital platforms
Customers	Service quality and experience	Reliable data and decision-support mechanisms	Support channels
Society	Social impact and awareness	Financial literacy and social contribution	Social projects
Suppliers	Sustainable business relationships	Responsible supply chain	Procurement processes, supplier risk assessment
Government and Regulatory Bodies	Compliance and Reporting	Regulatory compliance and system reliability	Reporting, official correspondence
Financial Institutions	Data sharing and collaboration	Effectiveness of the financial system	Collaboration meetings
Industry Associations	Information sharing	Industry development	Workshops
NGOs and Associations	Joint social projects	Social benefit	Joint projects
Academia	Research and knowledge generation	Data-driven knowledge generation	Research collaborations
Media	Transparent communication	Corporate reputation and disclosure	Press relations

OUR SUSTAINABILITY TARGETS

KKB establishes its sustainability targets in line with environmental, social, governance and economic priorities, and uses measurable indicators to monitor its performance. The initiatives carried out throughout 2025 focused on reducing environmental impact and increasing value for stakeholders.

Value for the Future (Environmental Targets)

2025 Performance	Evaluation
» The target to reduce the annual average PUE value to 1.4 was achieved. » The target to meet 3% of annual electricity consumption with renewable energy (solar power) was partially achieved (2.09%). » Activities to reduce the carbon and water footprints are ongoing. » Waste and water management practices are ongoing. » The target of reducing plastic consumption through limiting the use of PET bottles and transitioning to water filtration stations was achieved.	In 2025, strong performance was demonstrated in terms of environmental targets. Concrete progress was made, particularly through energy efficiency and resource management practices focused on data centres. However, increasing the use of renewable energy and improving carbon and water footprint management are key areas for development in the coming period.

Protecting Value (Governance and Operational Continuity)

2025 Performance	Evaluation
» Risks and actions were managed in accordance with the specified deadlines. » Continuity of the ISO 14001 management system was ensured. » Initiatives were carried out in management committees to increase knowledge and awareness in the field of sustainability.	The full achievement of all governance objectives demonstrates that KKB possesses a high level of discipline and maturity in risk management and operational processes. Tracking sustainability performance using the OKR methodology shows that this area has become a strategic priority throughout the organization.

Value for Society (Social Performance)

2025 Performance	Evaluation
» Every employee participated in at least two development programmes per year.	The fact that targets in the areas of employee experience and development have largely been achieved demonstrates the strong implementation of KKB's people-centred approach. However, there is still room for improvement in the areas of diversity and inclusion.

OUR SUSTAINABILITY TARGETS

Future Goals and Roadmap

KKB is shaping its sustainability roadmap in line with short-, medium-, and long-term goals.

In the short term, the company's priorities include breaking down emissions data under Scopes 1, 2 and 3, ensuring that environmental, social and governance (ESG) criteria are considered in supplier selection processes, implementing measures to reduce single-use plastic consumption, and improving water and energy efficiency in data centre operations.

In the medium term, the company aims to analyse risks and opportunities related to climate change, develop methodologies for reducing emissions, and expand the implementation of practices aimed at reducing the organisation's carbon and water footprints.

In the long term, the aim is to continue efforts aligned with net-zero and 1.5°C targets, develop sustainable products and services, and transition towards meeting energy needs through renewable sources.

KKB's ESG Performance and Development

KKB's ESG performance is measured using multidimensional criteria under environmental, social and governance headings as part of its internal evaluation methodology. This evaluation covers operational and strategic areas such as waste and energy management, employee practices, customer engagement, data security, and risk governance.

The Greendeks assessment model, developed by KKB, is used to measure organisations' environmental and social performance in line with its sustainability-focused data analytics capabilities. In this assessment, KKB was rated at the 'A – Excellent Sustainability' level for the overall ESG index, sustainability index, environmental index and sectoral index. This demonstrates that KKB has strongly integrated its sustainability approach into its operational processes and products and services.

According to the assessment results, areas of strong performance included energy management, recycling practices, data security, risk management, and customer engagement. KKB achieved a 'B – Good Level of Sustainability' in the social index and a 'C – Moderate Level of Sustainability' in the corporate governance index.

Recommendations for improvement focused on enhancing diversity and inclusion practices, increasing women's representation, and strengthening environmental certification processes.

The ESG Index is compiled by evaluating a company's compliance with ESG principles, taking into account the relevant industry and country.

Greendeks Rating: A (Excellent Sustainability)

KKB analyses its sustainability performance using various methodologies to track areas for improvement in a multidimensional manner. In this context, in addition to the Greendeks assessment, KKB conducted an ESG 4.0 assessment in 2025.

The ESG 4.0 framework provides a more detailed analysis than the ESG 3.0 methodology used last year, featuring more extensive data sets, a broader range of indicators, and more rigorous evaluation criteria. Despite this transition, the increase in the score demonstrates that KKB's improvement in sustainability performance is solid and long-lasting.

In the environmental dimension, strong performance was demonstrated in waste management, recycling and energy management; however, the development of environmental policies and a systematic approach was identified as an area for improvement. In the social dimension, product responsibility, customer engagement, and employee well-being are high-performing areas, whereas diversity and inclusion offer potential for development. In the governance dimension, high performance was achieved in risk management and data security.

POWER TO DATA

SECURE AND RESPONSIBLE DATA MANAGEMENT

KKB is at the core of the data infrastructure that underpins the reliability of the financial system. It views data security not merely as a technical requirement, but as a strategic priority that forms the foundation of all its operations. Through advanced cybersecurity practices, management systems aligned with international standards, and a robust data governance framework, KKB fosters trust across the financial ecosystem. The Company regards the protection of data privacy, the ethical use of data, and the uninterrupted delivery of services as fundamental pillars of sustainable value creation.

In this context, KKB empowers data to help ensure the secure and reliable functioning of the financial system.

Area	Content
Significance for KKB	Safeguarding the data infrastructure that underpins the reliability of the financial system.
Risks	Data breaches, cyberattacks, and non-compliance with regulatory requirements.
Opportunities	Enhanced stakeholder trust, opportunities to develop new data-driven products and services and strengthened competitive advantage.
Impact Magnitude	Very High (Systemic)
Management Structure	Information Security, Information Technologies (IT), Risk & Compliance, Senior Management
KPIs	Number of data breaches: 0 Maintenance of ISO 27001 and ISO 20000 certifications Achievement of ISO 27701 and ISO 27017 certifications

DATA SECURITY AND PRIVACY

KKB considers the protection of its data assets, which lie at the core of its operations, a strategic priority. To safeguard data confidentiality, integrity, and availability, the Company has adopted a multi-layered data security approach. Processes for the protection of personal data are structured and implemented in accordance with applicable national legislation and international standards. In this context, the principles of data minimization, purpose limitation, and transparency are embedded throughout all business processes, from product design to operational activities. Prior to any personal data processing activity, the necessary privacy notices are provided, explicit consent is obtained where required, and the personal data processing inventory is regularly updated.

Data security and privacy are supported by both the Information Security function, which has been operating independently for more than 10 years. The Information Security Committee, chaired by the President & CEO, is responsible for defining information security strategies, establishing and updating policies and procedures, and assessing information security risks. Through regular meetings, the Committee analyses existing and emerging threats, determines the necessary mitigation measures, and oversees personal data management in compliance with the Turkish Personal Data Protection Law (KVKK) and other applicable regulations. The implementation of the policies and standards established by the Information Risk Management Department and the Information Security Committee is carried out by the Information Technologies teams, while regular risk assessments, control activities, and audits are conducted to ensure compliance with these policies and standards.

KKB's data security framework is built upon its Information Security Policy, Information Security Management System Policy for Cloud Services, Business Continuity Policy, Personal Data Protection and Processing Policy, and Personal Data Retention and Destruction Policy. This framework covers all information processing activities and is managed in alignment with ISO 20000, ISO 27001, ISO 27017, and ISO 27701 standards. Third-party service providers and external parties with access to the Company's information technology infrastructure are also evaluated within this framework and are subject to the same security requirements.

KKB's data security strategy is based on the ISO 27001 standard. In 2025, the Company completed its ISO 27701 Privacy Information Management System implementation and successfully obtained certification. As a result, processes governing the processing, storage, transfer, and disposal of personal data have been standardized, while data classification, access authorization, and monitoring mechanisms have been further strengthened. On the technical side, data loss prevention (DLP) systems, data classification tools, data masking solutions, disk encryption technologies, and agent-based security solutions have been implemented. On the administrative side, legal compliance processes, enterprise risk management practices, and internal audit mechanisms support the overall data protection framework.

In protecting personal data, KKB operates in compliance not only with the Turkish Personal Data Protection Law (KVKK), but also with the Turkish Criminal Code and the regulations of the Banking Regulation and Supervision Agency (BDDK). Access to critical systems is controlled through formal approval mechanisms to prevent unauthorized access, secure communication protocols are implemented, and sensitive data are protected through data masking techniques. The Company's security infrastructure is continuously enhanced through threat intelligence activities, asset-based risk assessments, and comprehensive data classification practices.

Recognizing the critical role of human factors in sustaining data security, KKB provides its employees with regular information security and personal data protection (KVKK) training. In addition, employees and third-party stakeholders are required to sign confidentiality and data protection commitments. Through these practices, KKB aims to foster a strong organization-wide culture of information security and data privacy.

Looking ahead, KKB plans to further strengthen its data security and privacy framework by expanding and refining its policies and procedures, enhancing sensitive data management practices, and investing in next-generation security technologies. Reducing the risk of data leakage and strengthening control mechanisms remain among the Company's key priorities for the coming period.

CYBER SECURITY

KKB views cybersecurity not merely as a compliance requirement, but as an integral component of its trust-based business model. The Company positions the enhancement of its capabilities in protection against cyber threats, early detection, and rapid response as strategic priorities.

In line with the evolving threat landscape, emerging risk areas such as artificial intelligence governance, cloud computing, and post-quantum cryptography are closely monitored and managed through a proactive approach.

To enhance cybersecurity awareness, KKB utilizes social engineering tests, clean desk audits, and similar assessment tools. Employees' awareness levels are regularly monitored and evaluated to continuously strengthen the organization-wide cybersecurity culture.

Developments in 2025

- To ensure the security of information systems, the standards governing access authorization, password management, software development, and system implementation, as well as information security incident response and cyber incident management processes, were reviewed and updated in line with evolving technological developments.
- Authentication and access management processes have been restructured to strengthen application login architecture and password management protocols; a system infrastructure more resilient to the risks of unauthorized access has been established.
- A significant portion of the Cybersecurity and Threat Monitoring Team's operations has been automated; operational efficiency has been improved by automatically managing the majority of security alerts. As part of this effort, six new incident response processes have been designed and implemented.
- Within the scope of software security, source code analyses have been automated; technical infrastructure has been established to enable security scans of artificial intelligence models.
- The ISO 27017 Information Security Management System for Cloud Services certification has been completed, bringing security controls for cloud environments into compliance with international standards.
- Mandatory Information Security training was assigned to employees as part of the onboarding process and to those who did not successfully complete simulated phishing or similar security awareness tests.
- Through events supported by the corporate awareness mascot KK-Bee, employees' cybersecurity awareness was enhanced, and the overall level of awareness across the organisation was strengthened.
- Guidelines were prepared to increase information security awareness among member companies, on-site inspection mechanisms were established, and system access was restricted through technical and administrative controls such as IP restrictions.

In the coming period, strengthening security controls related to cloud technologies and developing proactive defence capabilities against cyber threats will be among the priority areas. Additionally, the goal is to effectively manage risks related to model reliability, access management, and logging controls arising from the use of artificial intelligence and generative AI (GenAI).

DATA GOVERNANCE AND ETHICS

KKB adopts a holistic data governance approach that addresses the entire data lifecycle end-to-end to ensure the effective, consistent, and responsible management of its data assets. Within this framework, all processes from data creation and storage to usage and disposal are managed in accordance with defined policies and standards. Data processing activities are carried out in line with the principles of transparency, accountability, and data minimization.

KKB develops various data-driven solutions to enhance data quality, ensure data accuracy, and enable secure and standardized data sharing across the sector. The applications implemented within this scope support organizations in operating with more reliable data and enhance the effectiveness of decision-making processes. Some of the applications supporting this approach are presented alongside.

Throughout 2025, efforts to maintain and improve data quality continued. The data governance framework was further strengthened through data access policies, authorization processes, and business data dictionaries. Analytical and reporting activities conducted using collected data contributed to the development of decision-support mechanisms, while data sharing practices that enhance transparency within the financial system continued on a regular basis. Data-driven decision-making culture has been further supported through developed analytical tools and dashboards.

Address Processing Service

The Address Processing Service enables the standardization, updating, and enrichment of customer address data. Within the scope of the service, address information is revised in line with current administrative changes, geographic coordinate data is added, and the accurate and consistent entry of new addresses into systems is supported. In addition, coordinate-based address verification and mapping functionalities enhance the accuracy and efficiency of data utilization.

Limit Control System (LKS)

The Limit Control System (LKS) enables the consolidation of limit information obtained from credit card-issuing institutions across the sector on a customer basis and its provision to relevant institutions. Through this system, financial institutions gain access to more comprehensive and accurate customer data, strengthening risk assessment and decision-making processes. The update services provided under LKS enable faster and more efficient data entry and correction processes.

Verification Services

KKB's Verification Services are designed to support a more reliable financial ecosystem by reducing the operational and cost burden of institutions and organizations operating in the financial sector, while providing members with a secure environment through time-efficient verification processes.

The Verification Services portfolio includes the IBAN Verification Service (IBAN Inquiry and IBAN Confirmation), Turkish National ID Number (TCKN) & GSM Verification Service, and Card Verification Service.

DATA GOVERNANCE AND ETHICS

Artificial Intelligence Governance and Responsible Use

KKB considers artificial intelligence applications an integral part of its data governance approach and manages its activities in this field within an ethical, reliable, and accountable framework. Established in this direction, the Artificial Intelligence Management Committee is responsible for defining AI strategies, evaluating the strategic alignment of projects, analysing their impacts on business processes, and managing prioritization processes. In addition, resource planning for artificial intelligence investments is conducted, and monitoring and communication mechanisms are operated for critical risk areas.

The principles of control, traceability, and responsible use are taken into consideration in the development and utilization of artificial intelligence applications. Standards are established to ensure that projects are implemented in a secure, manageable, and sustainable manner. Within this scope, AI solutions are provided through a centralized and controlled structure, strengthening corporate oversight mechanisms over model usage and data access.

To support the scalable and sustainable management of artificial intelligence applications across the organization, KKB has adopted a common artificial intelligence service approach that can be adapted to different use cases. This approach enhances standardization in AI solutions while supporting the widespread adoption of secure and ethical AI use at the organizational level.

Risks associated with artificial intelligence applications are addressed across dimensions such as model reliability, data usage, access control, and output accuracy. KKB adopts a proactive risk management approach in these areas. In particular, the Company aims to reduce privacy risks associated with the use of real data through the utilization of synthetic data and develops innovative solutions that protect data privacy.

DATA CENTRE INFRASTRUCTURE

KKB considers managing the increasing volume of data resulting from accelerated digitalization on a secure, uninterrupted, and scalable infrastructure as a strategic priority. Accordingly, its Data Centre infrastructure is continuously enhanced through an approach focused on high availability, operational continuity, and system integrity.

Within this framework, KKB's physical infrastructure strengthened by the KKB Anadolu Data Centre located in Ankara, together with cloud solutions provided through the Kloudeks platform, are managed as an integrated end-to-end structure supporting the Company's data infrastructure.

KKB Anadolu Data Centre

Since 2016, the KKB Anadolu Data Centre has been providing disaster recovery, backup, and cloud services to data-intensive organizations across various sectors, including primarily the financial sector, as well as e-commerce, insurance, and public institutions. Recognized as one of Türkiye's critical digital infrastructures, the facility is located in Ankara and built on an area of 43,000 m2, with approximately 2,800 m2 of white space. Through free-cooling systems, 2N power redundancy supported by DRUPS and Static UPS systems, and advanced fire suppression solutions, the facility ensures uninterrupted and secure operations.

Through the Anadolu Data Centre, KKB manages the financial ecosystem's data infrastructure in a secure, resilient, and scalable manner. Operated in accordance with TIER IV Design & Facility requirements and ISO 27001, ISO 22301, and ISO 27701 standards, the centre ensures data security through access control systems, continuous monitoring infrastructure, and backup mechanisms. Critical data is protected across geographically separate locations, while access to customer systems is granted only under authorized supervision.

Operational processes are managed through DCIM, BMS, SCADA, and Alpha Service Manager systems. Artificial intelligence-supported monitoring and capacity planning solutions contribute to operational continuity and resource efficiency. Energy, cooling, and security performance are regularly monitored and reported within the scope of ISAE 3402 Type 2. Disaster recovery plans are implemented for emergency scenarios, and system continuity is ensured through scenario-based tests and drills.

One of the most significant developments in 2025 was the initiation of the second-phase investment of the KKB Anadolu Data Centre in response to increasing data volumes and evolving market needs. Initiated in parallel with the full utilization of Phase 1 capacity, this investment represents not only a capacity expansion but also a strategic infrastructure vision designed to support rapidly growing areas such as cloud computing and artificial intelligence.

With the ongoing investment, the Data Centre capacity is targeted to reach 3,000 cabinets, while the power infrastructure is planned to achieve an installed capacity of 40 MVA with 2N redundancy. The first stage of the Phase 2 investment is planned to become operational in 2027, with the overall project scheduled for completion in 2028. Upon completion of the first stage of Phase 2, the Data Centre's Phase 2 IT power capacity is expected to reach approximately 7.5 MW.

As part of the project design process, the TS EN 50600 Data Centre Design Certification was obtained, confirming the infrastructure's compliance with international standards. In line with the commitment to sustainable operational excellence, TS EN 50600 Operational Certification for Phase 1 has also been completed, while facility and operational certification processes for Phase 2 are planned to be finalized.

Throughout 2025, process efficiency in Data Centre operations was enhanced, automation practices were expanded, and system installation processes were optimized. Within this scope, a next-generation DCIM system was implemented, enabling more effective and centralized management of operations. In addition, improvements in virtual machine management processes increased cost and operational efficiency, reduced reliance on manual intervention, and enabled faster and more controlled processes.

TIER IV DESIGN

TIER IV FACILITY

LEED PLATINUM

ISO 22301

ISO 27001

ISO 27701

DATA CENTRE INFRASTRUCTURE

KLOUDEKS

Locally developed and Secure Cloud Platform

Launched in 2025, Kloudeks is a locally developed cloud platform by KKB, enabling organisations to access secure, flexible and scalable technology infrastructures without the need for significant upfront investments.

With its integrated structure addressing data security and operational continuity requirements, Kloudeks offers a comprehensive product and service portfolio across six main categories: virtual Data Centres, cloud infrastructures, backup and disaster recovery, security, managed services, and artificial intelligence. Through this platform, data is securely stored within Türkiye's borders, organizations' digital transformation processes are accelerated, and the adoption of artificial intelligence technologies at the enterprise level is supported.

Kloudeks provides services through three core cloud service models designed to address diverse organizational needs:

- **Community Cloud:** Establishment of compliant and secure cloud environments for regulated industries
- **Private Cloud:** Dedicated, isolated, and highly secure infrastructure solutions tailored to organizations' specific needs
- **Public Cloud:** A cloud model offering rapid deployment and flexible usage capabilities for organizations operating outside regulated sectors

Throughout 2025, the technical infrastructure of the Kloudeks platform was significantly enhanced, creating a more flexible, scalable, and high-performance structure. Within this scope, microservices architecture, auto-scaling capabilities, and continuous integration infrastructures were implemented. API management, data storage, and service monitoring capabilities were strengthened, enabling systems to be managed in a faster, more secure, and uninterrupted manner.

During the same period, the cloud and artificial intelligence services offered through the platform were expanded. With the establishment of the centralized GPU infrastructure, AI model development and deployment environments, data processing and analytics infrastructures, and API-based services were made available to organizations. Solutions enabling the delivery of large language models as a service have provided organizations with a flexible and scalable artificial intelligence environment, supporting the adoption of locally developed AI technologies across various sectors.

As of 2026, further enhancements to the Kloudeks platform are planned across the areas of security, governance, and user experience. Within this scope, KKB aims to strengthen security and governance mechanisms for AI services, expand transparency and traceability practices related to data usage, and develop structures that enable services to reach a broader user base. In addition, the Company plans to offer community cloud services specifically designed for payment and electronic money institutions.

Strategic Partnership with HAVELSAN

A strategic technology partnership was established with HAVELSAN during the development of Kloudeks. As part of this partnership, software and technology solutions developed by HAVELSAN have begun to be made available to organizations through the Kloudeks platform. This collaboration has strengthened the platform's technological capabilities while supporting the widespread adoption of locally developed and secure solutions for both the public and private sectors.

VALUE FOR FINANCIAL LIFE

FINANCIAL INCLUSION AND ECOSYSTEM

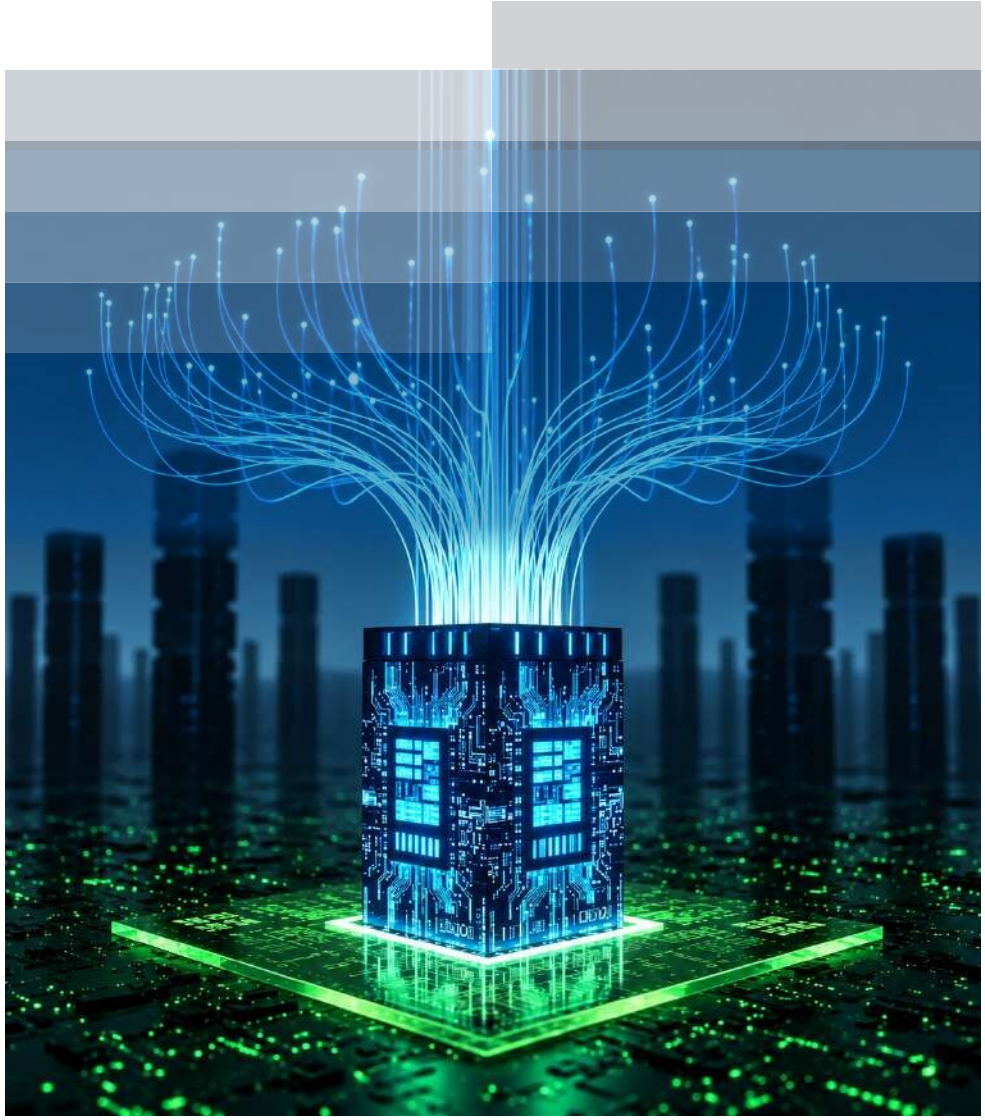
Leveraging its advanced data analytics capabilities and digital expertise, KKB contributes to the development of a more transparent, accessible, and trust-based financial system. The products and services developed in line with its financial inclusion approach support individuals and businesses in accessing financial services more easily while strengthening a culture of data-driven decision-making in financial processes.

The solutions offered through the Findeks platform enable individuals to manage their financial standing more effectively and help businesses conduct risk assessment processes in a more informed and efficient manner. Through these solutions, KKB aims to promote transparency, trust, and sustainability in financial relationships.

By closely monitoring the evolving needs of the financial ecosystem, KKB maintains its reliable, data-driven approach across customer experience, data security, risk management, and digital service processes. Through its innovative solutions, the company continues to create value for financial life.

KKB's performance focus, key risks and opportunities, and governance structure related to financial inclusion are summarized in the table below:

Area	Content
Significance for KKB	Data-driven solutions that enhance financial access and improve the quality of financial decision-making
Risks	Limited financial visibility
Opportunities	Increased use of alternative data, channel diversification, and expansion of digital products
Impact Magnitude	Very high
Management Structure	Product Management, Brand Management and Growth, Digital Experience Management
KPIs	Number of Findeks members: 8,832,937 Consistency of quarterly financial reports Chatbot query resolution Rate: 97%



FINANCIAL INCLUSION

KKB develops data-driven solutions and digital services to support the development of a more inclusive, accessible, and sustainable financial system. In line with this approach, the company implements applications that facilitate access to financial services for different customer segments and promotes broader participation in the financial system through data-based assessment mechanisms, particularly in credit access. The systems offered by Findeks enable financial institutions to make assessments based on more up-to-date, accurate, and comprehensive data, thereby enhancing the efficiency, speed, and reliability of credit processes. Through its analytical infrastructure and digital capabilities, KKB supports more informed and effective financial decision-making processes.

To further support this approach, KKB offers a comprehensive digital service ecosystem under the Findeks brand, encompassing a mobile application, online branch, website, and social media channels. Through these continuously enhanced platforms, which are designed with a strong focus on user experience, individuals and businesses can access their financial information quickly and conveniently. Interactive calculation tools, sample risk reports, cheque and QR-coded cheque reports, and guidance materials available on these platforms aim to improve financial awareness. Through the "My Score Advisor" service, individuals are guided in interpreting their credit scores more accurately, monitoring their financial standing, and identifying potential actions they may need to take. In this way, KKB contributes to improving financial awareness and literacy.

KKB considers the development of financial literacy to be one of the key pillars of financial inclusion. Accordingly, the company supports the enhancement of users' financial awareness through blog content on the Findeks website, educational videos, social media posts, and content provided under Findeks Academy. Campaigns related to Findeks products and services are communicated through SMS, email, and digital channels, while regular information on credit reports and risk management is shared through YouTube content, social media posts, and the Frequently Asked Questions section.

Recognizing that some users may have limited levels of financial literacy, KKB develops its content using a clear, simple, and user-friendly approach. The interfaces of its digital platforms are regularly simplified to enhance accessibility. User experience is further strengthened through self-service transactions, chatbot solutions, and online advisory services. In addition to call centre and expert support teams, fast and effective assistance is provided through the "Bilgiç" chatbot.

KKB conducts all these activities in accordance with the principles of transparency and ethics. The company does not direct users toward specific credit products and takes care to support fair competition. At the same time, information on the criteria used in calculating individual credit scores is shared within the scope of analytical studies.

As digitalization continues to expand, KKB is also strengthening its efforts to raise cybersecurity awareness. Users are regularly informed through email, SMS, and mobile notifications, while online training programmes support the development of cybersecurity awareness.

Some of KKB's other products and services that support financial inclusion are presented below:

Agricultural Loan Assessment System (TARDES)

TARDES provides an important solution that facilitates access to financing for agricultural producers. Through TARDES, financial institutions can conduct agricultural loan assessment processes systematically, based on accurate and up-to-date data while reducing the need for specialized expertise. In this way, financial inclusion in rural areas is strengthened. In 2025, enhancements were implemented to further improve TARDES and increase the quality of the services provided.

First Payment Score

The First Payment Score is a scoring product that measures the risk of non-payment starting from the first instalment of personal loan applications. The score is calculated using data from the Credit Reference System (KRS) and the Loan Utilization Instant Sharing System (KAPS). Available through a standalone web service, the product is designed to identify potentially fraudulent loan applications—where borrowers are considered likely to have no intention of making any repayments—before loan disbursement, thereby helping institutions keep the ratio of loans that progress to collections under control.

FINDEKS

Findeks, KKB's service platform for individuals and the real sector, provides an integrated structure that supports both financial inclusion and financial literacy. The platform facilitates easier access to financial data for individuals and businesses, enabling more effective risk management and fostering greater trust in financial transactions.

The solutions offered through Findeks help individuals better understand their financial standing, manage their financial behaviours, and make informed decisions. At the same time, they enable companies operating in the real sector to assess customer risk and make more informed commercial decisions. This structure contributes to faster, more reliable, and data-driven financial transactions while supporting the broader adoption of payment discipline, the mitigation of risks, and increased trust in commercial relationships.

Developments in 2025

- **Non-Membership Access:** To support financial inclusion, the "Credit Score Inquiry Without Membership" service was introduced, reducing access barriers and enabling approximately 10,000 users to access the system.
- **Bank Integrations:** The integration of Risk Reports into the mobile applications of 8 new banks was completed. In addition, Findeks PDF reports became available through the mobile channels of five banks. As a result, approximately 9.2 million PDF reports were sold during the year, representing 12% growth compared to the previous year.
- **Comprehensive Risk Report:** The content of the Risk Report was updated in line with user needs and evolving market conditions. New data fields were added, selected data began to be provided through daily notifications, and the historical performance monitoring period was extended from 18 months to 36 months, enabling more comprehensive assessments.
- **Findeks Radar:** Through the Findeks Radar package, which supports the proactive management of financial health, more than 7,000 users began monitoring their credit scores in real time and tracking changes simultaneously.
- **Channel Enhancements:** The Findeks mobile application and website were redesigned to provide a more intuitive and streamlined user experience aligned with user habits. Based on customer feedback, complex information was presented in a more understandable manner, contributing to greater financial awareness.
- **Push Notifications and Growth:** As part of the push notification integration, 14 million notifications were sent throughout the year. Supported by various campaigns, the number of credit score inquiries increased by 2.5 times compared to the previous year, resulting in the acquisition of more than 500,000 new members.
- **Artificial Intelligence in Customer Services:** As part of customer service digitalization efforts, the automated response rate through the chatbot channel reached 97%, contributing to improved operational efficiency.
- **Digitalization of Processes:** Membership management processes and authorization mechanisms for corporate and commercial customers were fully migrated to digital platforms. This significantly reduced processing times and delivered an average 60% time saving.
- **Cybersecurity Infrastructure:** Identity authentication and access management processes were restructured in line with cybersecurity standards, creating a more secure login architecture and strengthening the protection of user data.

FİNDEKS

Findeks Ecosystem: 2025 Key Indicators

FINDEKS INDIVIDUAL MEMBERS	FINDEKS COMMERCIAL MEMBERS
8,205,302	627,635
FINDEKS TOTAL MEMBERS	**FINDEKS CREDIT SCORE INQUIRIES**
8,832,937	1,208,007
FINDEKS RISK REPORT INQUIRIES	**FINDEKS CHEQUE REPORT INQUIRIES**
10,550,352	679,025
QR-CODED CHEQUE REGISTRATIONS	**QR-CODED CHEQUE REPORT INQUIRIES**
24,852	10,047,560

Future Goals and 2026 Vision

In 2026, Findeks aims to evolve into a more accessible, inclusive, and AI-powered platform. In this context, the company plans to transform Findeks into an ecosystem where users can manage their financial health through data-driven insights while introducing next-generation solutions. For the commercial segment, efforts are underway to develop platforms that will enable SMEs to monitor their financial indicators through a single interface. Through the use of alternative data and digital solutions, Findeks also aims to further strengthen financial inclusion.

CUSTOMER EXPERIENCE

KKB provides services to a broad network of stakeholders, including banks, financing and factoring companies, financial leasing and asset management companies, insurance companies, payment and electronic money institutions, investment firms, and companies operating in the real sector. This structure enables the Company to deliver integrated solutions that address the diverse needs of the financial services ecosystem.

Member and customer expectations are collected through email channels, working groups, member representatives, and the Customer Communication Centre, while user feedback from digital channels such as social media platforms, chatbots, forums, and mobile application stores is regularly monitored. The data obtained are analysed and supported by annual satisfaction surveys to identify areas for improvement.

In line with this approach, product content and functionalities are continuously updated based on customer feedback and usage data. For mobile applications in particular, simplification initiatives and user behaviour analyses have been utilized to enhance notification management and product recommendation mechanisms, enabling a more personalized user experience.

In 2025, KKB introduced personalized and data-driven customer experience solutions designed to provide users with quick and easy access to financial services. Onboarding processes were streamlined, and recommendation mechanisms based on user behaviour were implemented. In line with persona-based target audience definitions, digital channels were redesigned, while package structures, cross-product offerings, and the option to purchase products without membership requirements increased user engagement and made Findeks platforms significantly more accessible.

To expand customer reach and support financial inclusion, new distribution channels were introduced. Through banks' mobile channels and collaborations with electronic money and payment institutions, approximately 75,000 users were reached. In addition, the SMS-based credit score inquiry service provided more than 250,000 users annually with fast and low-barrier access to financial information. The service network was further expanded through broader sectoral collaborations, including partnerships with the factoring and consumer finance sectors.

Further details regarding initiatives undertaken to enhance customer experience across the Findeks and Greendeks platforms are provided in the "Findeks and Products" and "Greendeks and Sustainable Finance Solutions" sections.

VALUE CREATION THROUGH DATA

By positioning its data infrastructure as a strategic value driver, KKB creates value across the financial ecosystem through digital solutions that promote trust, transparency, and efficiency. Through its data-driven services, the Company enhances the accuracy of financial transactions, mitigates risks, and enables faster and more effective decision-making processes. This approach contributes to strengthening a reliable and sustainable financial system.

Financial Trust and Verification Infrastructure

Through verification solutions developed to enhance trust in financial transactions, KKB helps reduce the risks of errors and fraud while supporting users in conducting transactions more securely.

The IBAN Verification Service reduces the risk of erroneous transactions by enabling the verification of beneficiary information during fund transfers. The National ID Number (TCKN) and Mobile Number Verification Service strengthens identity verification processes across digital channels. In addition, the Card Verification Service provides an additional layer of security for remote transactions, helping to mitigate fraud risks.

Furthermore, through the Cheque Status Inquiry and Letter of Guarantee Status Inquiry solutions, the validity of financial documents can be verified in real time. These services help reduce the risk of fraud while accelerating transaction processes.

Data Transparency and Access to Information

The presentation of financial data in a standardized, comparable, and accessible manner enables users to make more informed decisions. In this context, the BDDK Product and Service Fees Portal provides transparent information on fees, commissions, and charges related to banking products and services, allowing users to compare financial products more effectively.

Through the Trade Registry Sharing System, institutions can monitor customer information on an up-to-date basis, facilitating access to information and supporting data-driven decision-making processes.

Digitalization and Process Efficiency

Through the digital platforms it has developed, KKB enables financial processes to become faster, more traceable, and more efficient. The Electronic Letter of Guarantee application digitalizes the entire lifecycle of letters of guarantee, reducing processing times, lowering operational costs, and enabling more transparent process management.

Data-Driven Risk and Decision Management

Through its analytical products and scoring models, KKB supports the credit decision-making processes of financial institutions, contributing to the early identification and more effective management of risks. These data-driven solutions analyse the financial behaviour of individual and commercial customers from multiple perspectives, making decision-making processes faster, more objective, and more predictable.

In the retail segment, the Individual Credit Score and Individual Indebtedness Index analyse users' credit repayment performance and borrowing tendencies, enabling the early identification of potential risks.

In the commercial segment, the Commercial Credit Score and Commercial Indebtedness Index assess companies' credit repayment capacity and tendencies toward excessive indebtedness. In addition, analytical solutions such as the Cheque Score, Agriculture Score, and First Payment Score provide multidimensional analyses of risks specific to different sectors and products, supporting faster, more consistent, and more reliable decision-making in credit allocation processes.

Some of the applications that support this approach are presented alongside:

MERCEK

Developed in 2025 on the GeoMIS platform, a decision-support infrastructure based on geospatial data analysis and visualization, MERCEK enables users to analyse and interpret data in real time by integrating different datasets with geospatial analytics. Positioned as a powerful decision-support tool that transforms data into actionable insights through its segment-based analysis, benchmarking, and reporting capabilities, MERCEK enhances the speed and effectiveness of data-driven decision-making processes.

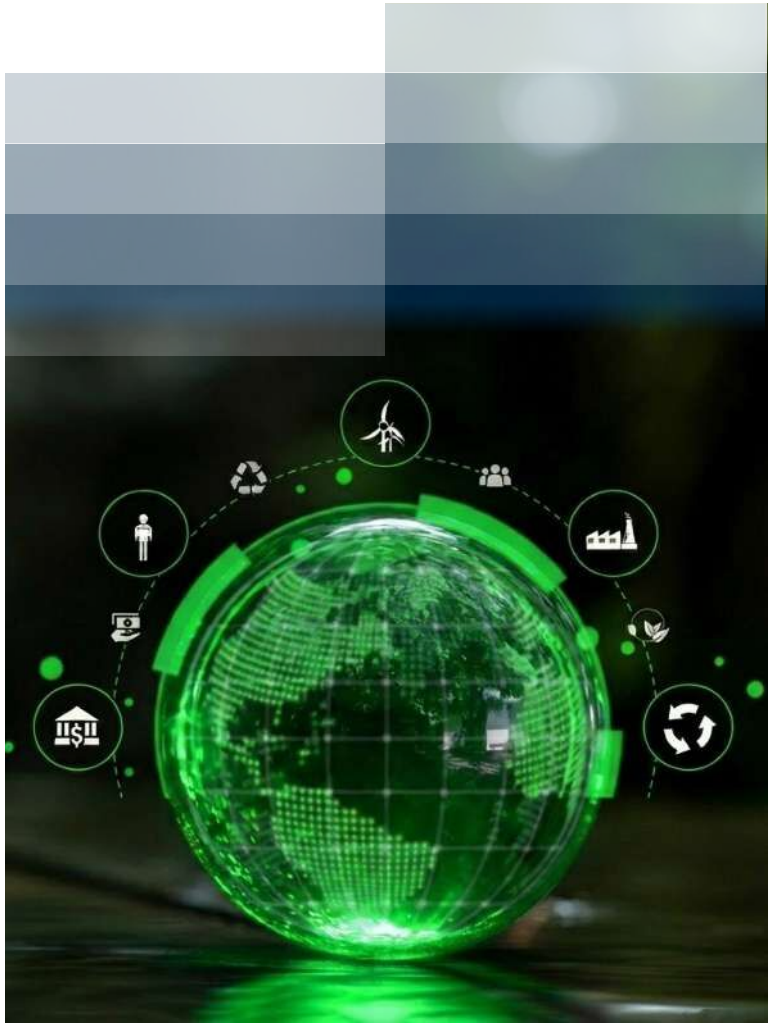
Cheque Deduplication Implementation

Introduced in 2025, the Cheque Deduplication Implementation strengthened data integrity by consolidating cheque information obtained from multiple data sources into a unified structure. The solution also enabled end-to-end traceability throughout the cheque lifecycle. As a result, data flows were accelerated, processes were streamlined, and users gained faster, more consistent, and more reliable access to information, enhancing the overall digital customer experience.

DEVELOPMENTS IN 2025

Developments in 2025

- **Analytical Model Development:** New versions of the Commercial Credit Score and Commercial Indebtedness Index models were developed using KKB's in-house resources and made available for use. These enhancements improved model performance and enabled more reliable risk assessments.
- **Data-Driven Product Development:** Insights gathered through member feedback and Analytical Working Groups were integrated into product development processes, supporting the continuous enhancement of products and services.
- **Data Innovation and Privacy:** Studies on federated learning models were initiated to support the development of next-generation solutions that prioritize data privacy and security.
- **Digital Infrastructure:** Efforts to expand the Electronic Letter of Guarantee Platform continued throughout the year, increasing the number of integrated banks and beneficiaries. In addition, improvements were implemented in the Agricultural Credit Evaluation System (TARDES) to enhance service quality.
- **Fraud Prevention and Risk Mitigation:** Under the HAPS (Account Opening Sharing System) project, collaborative efforts with the Interbank Card Centre (BKM) continue to develop solutions for detecting social engineering-related risks and biometric approaches for analysing user behaviour.
- **Data-Driven Financial Processes:** Technical enhancements were completed for the e-Ledger Project, which enables the sharing of companies' electronic ledger data with lending institutions through KKB, and integration processes were initiated. The project aims to facilitate access to finance and improve process efficiency by providing faster and more reliable access to data during credit assessment processes.
- **Data and Document Management:** In 2025, the "Digital Document Centre" product was developed to digitize the documentation processes required by the banking ecosystem, consolidate data from these documents in a centralized structure, and provide access through a single channel.



VALUE FOR THE FUTURE

CLIMATE AND SUSTAINABLE FINANCE TRANSFORMATION

KKB does not limit its approach to sustainability to its own operational impacts alone but plays a role in contributing to the transformation of the financial system. Combating climate change and managing environmental impacts are among the key components of this transformation.

Whilst environmental impacts are reduced through energy efficiency initiatives and investments in renewable energy in data centre operations, data-driven solutions such as Greendeks are used to measure businesses' sustainability performance and support their access to green finance.

By harnessing the power of data, KKB is contributing to the climate-focused transformation of the financial system and creating value for the future.

Area	Content
Significance for KKB	Role as a data provider in climate-focused financial transformation
Risks	Energy costs, regulatory pressure
Opportunities	Greendeks, green finance, new markets
Impact Magnitude	High (increasing)
Management Structure	Sustainability, strategy, data centre, product teams
KPIs	- Electricity consumption per employee (kWh/person) 61,865 - Renewable energy share (%) 89.15

APPROACH TO CLIMATE CHANGE

KKB approaches climate change not merely as an environmental issue, but as a multidimensional area that directly affects the functioning of the financial system, data-driven risk analyses and long-term value creation. In line with this, climate-related impacts are integrated into corporate strategy, risk management and product development processes; decision-making mechanisms are shaped by this perspective.

Within this holistic approach, the systematic identification, assessment and management of risks and opportunities associated with climate change constitute one of the key components of KKB's sustainable growth strategy. At KKB, climate and sustainability issues are managed through a robust governance structure.

- The Board of Directors bears ultimate oversight responsibility for climate-related risks and opportunities.
- The Sustainability Committee is responsible for strategic guidance and performance monitoring.
- Senior management oversees the integration of climate risks into the business strategy and the monitoring of KPIs.
- Climate risks are regularly placed on the Board of Directors' agenda
- Financial impacts (CAPEX, OPEX, revenue impact) are reported
- Scenario analyses and stress tests are conducted.

KKB views climate change not merely as an environmental issue, but as a multidimensional area of transformation that directly affects

- **the functioning of the financial system,**
- **data-driven risk analyses,**
- **and long-term value creation.**

Accordingly, climate-related impacts are being integrated into corporate strategy, risk management and product development processes.

Managing Climate Risks and Opportunities

1. Strategic Approach: Shaping the Future through Climate Resilience

As one of the leading institutions strengthening Türkiye's financial infrastructure, KKB has adopted an approach that supports sustainable development and contributes to the green transition of the financial sector. In addition to delivering value to the financial ecosystem through a reliable data infrastructure and advanced risk management solutions, KKB follows a value creation model that prioritises long-term resilience while upholding its environmental and social responsibilities.

The growing impacts of climate change are addressed in an integrated manner within corporate governance and business processes; the issue is assessed not merely as an environmental concern, but as a multi-dimensional area of risk and opportunity with implications for economic stability, financial systems and the real economy.

Within the scope of its activities, KKB operates with an awareness of the indirect effects of climate change on both its own operations and on the financial institutions it serves, as well as on the customers of these institutions. In line with the Paris Agreement targets and Türkiye's 2053 Net Zero Emissions vision, data and analytical solutions are being developed to contribute to the transition to a low-carbon and climate-resilient economy; the KKB is playing a supportive role for the financial sector in this area.

APPROACH TO CLIMATE CHANGE

2. Identification and Assessment of Climate-Related Risks and Opportunities

Methodology and Strategic Framework

KKB conducts climate-related strategic decision-making processes and risk–opportunity analyses within a framework that is fully integrated with its established corporate governance and risk management systems. When prioritising issues, consideration is given to national policy frameworks, international standards such as the TCFD recommendations, and stakeholder expectations, particularly those of member financial institutions and regulatory authorities.

The assessment processes are not based solely on an analysis of the current situation; a multi-layered approach is adopted that also encompasses forward-looking projections and scenarios. In this context, corporate risk management methodologies, strategic objectives and CAPEX and OPEX plans serve as the basis; operational data—such as energy consumption, water usage and PUE—obtained from all locations, particularly the KKB Anadolu Data Centre, are utilised to identify physical risks and areas for efficiency improvements.

Internal analyses are reinforced by international benchmarks. In this regard, globally recognised studies—such as the IPCC's physical risk models and the NGFS's transition scenarios to a low-carbon economy—are integrated into the assessment processes.

Scope and Areas of Assessment

Climate-related risks (physical and transition) and opportunities are assessed across four main areas:

- **Service Portfolio and Innovation Activities:** These are analysed in terms of transition risks and opportunities arising from changing regulations, customer expectations and new technologies. This analysis covers both the climate-related indirect risks of existing services and ESG-based strategies for developing new products and services.
- **Technology Infrastructure and Strategic Partnerships:** The technology infrastructure and data centres, which form the backbone of operations, are assessed in terms of physical risks threatening operational continuity—such as extreme weather events—and transition risks such as energy efficiency regulations.
- **Operational Processes and Corporate Footprint:** Physical risks (water cuts, the impact of extreme heat on cooling systems, etc.) and transition risks (carbon taxes, rising energy costs, etc.), as well as opportunities for operational efficiency, are examined through the lens of energy and water consumption and the operational carbon footprint of offices and data centres.
- **The Financial Sector and Real Economy Served:** Climate-related credit and market risks in the portfolios of member financial institutions are the most significant external factors directly shaping their strategies and new product development processes. The key opportunity in this area is to provide the financial sector with the data and analytical solutions required to manage climate risks.

Time Horizons and Impact Assessment

Risks and opportunities are addressed within time horizons aligned with strategic planning and budgeting cycles:

- **Short Term (0–3 Years):** Covers topics such as annual budgeting, technology roadmaps and urgent compliance with new regulations.
- **Medium Term (3–10 Years):** This includes structural policy transformations, such as national carbon pricing, and large-scale technology investments.
- **Long Term (10+ Years):** This shapes strategic positioning within the framework of long-term commitments, such as Türkiye's 2053 Net Zero Emissions target, and the structural transformations the economy will undergo.

When assessing the potential financial and strategic consequences of climate-related risks and opportunities, the impact levels "very low", "low", "medium", "high" and "very high" are used.

APPROACH TO CLIMATE CHANGE

3. Key Climate-Related Risks and Management Approaches

The table below summarises the key climate risks identified, their potential impacts and their likelihood of occurrence.

Low | Medium | High

Risk Category	Key Risks	Magnitude of Impact	Probability of Occurrence	Time Horizon	Actions Taken to Mitigate Risks
Physical Risk (Acute)	Extreme weather events and operational disruptions: Climate-related events such as rising temperatures, severe storms, extreme rainfall and flooding affecting critical infrastructure, particularly KKB's data centres and office buildings	Medium **Financial:** Increased repair and refurbishment costs, rising insurance premiums and costs arising from contractual obligations. **Reputation:** Risk of damage to the perception of being a reliable service provider. **Service Continuity:** Unplanned downtime, service interruptions. **Legal:** Risk of breaching Service Level Agreements (SLAs).	Medium	Short-Medium Term	Infrastructure investments offering high levels of resilience (the KKB Anadolu Data Centre, certified to Tier IV and LEED Platinum standards); asset insurance investments
Physical Risk (Chronic)	Rising average temperatures and data centre efficiency: Temperature rises linked to global warming place an additional burden on data centre cooling systems, thereby increasing energy consumption and costs.	High **Financial:** A continuous rise in energy costs and the need for CAPEX investment in efficiency measures. **Reputation:** Increased reputational risk due to a growing carbon footprint. **Service Continuity:** Reduced performance and an increased likelihood of failure in cooling systems. **Legal:** Risk of struggling to comply with energy efficiency standards.	High	Medium – Long Term	A project on water recovery in adiabatic systems used in cooling processes
Physical Risk (Chronic)	Water scarcity and operational restrictions: The introduction of restrictions on water use as a result of prolonged drought and increasing pressure on water resources.	Low **Financial:** Increase in water costs and the need for investment in efficiency. **Reputation:** Risk of corporate reputation being adversely affected due to water stress. **Service Continuity:** Risk of disruption to cooling operations. **Legal:** Obligation to comply with water usage quotas.	Low	Medium – Long Term	A project on water recovery in adiabatic systems used in cooling processes; rainwater collection

APPROACH TO CLIMATE CHANGE

Low | Medium | High

Risk Category	Key Risks	Magnitude of Impact	Probability of Occurrence	Time Horizon	Actions Taken to Mitigate Risks
Transition Risk (Policy and Legal)	Carbon pricing and rising energy costs: Increased costs associated with Scope 2 emissions following the introduction of a National Emissions Trading Scheme (ETS) or a carbon tax.	**High** **Financial:** A significant increase in operating expenses (OPEX). **Reputation:** Growing perception that the organisation has a high carbon footprint. **Service Continuity:** Rising cost pressures challenging operational sustainability. **Legal:** The obligation to comply with new climate policies	**Low**	Short-Medium Term	Use of renewable energy within the scope of the I-REC certificate
Transition Risk (Technology)	Delays in the transition to low-carbon technology: As a result of delays in the adoption of highly energy-efficient technologies, the existing infrastructure becomes obsolete and the competitive advantage is eroded	**High** **Financial:** Risk of idle assets and unplanned CAPEX requirements. **Reputation:** Risk of a decline in the organisation's image as an innovator. **Service Continuity:** Decline in operational efficiency and an increase in maintenance requirements. **Legal:** Risk of failing to comply with future standards.	**Medium**	Short-Medium Term	The implementation and continuity of Green IT management
Transition Risk (Market/ Product)	Loss of validity of credit risk models: A decline in the predictive power and market value of traditional credit risk models due to the economic impacts of climate change	**High** **Financial:** Declining demand for core products, loss of revenue and rising R&D costs. **Reputation:** The perception that the organisation is unable to provide forward-looking risk analysis. **Service Continuity:** A decline in the quality of core services. **Legal:** The risk that regulatory authorities may deem the models to be inadequate.	**Low**	Medium Term	Current and planned R&D investments
Transition Risk (Market)	Changing customer and stakeholder expectations: The risk of losing customers due to a failure to meet stakeholders' expectations for greater transparency, a lower carbon footprint and concrete climate action	**High** **Financial:** Loss of customers and a decline in revenue. **Reputation:** Perception of lagging behind the sector and erosion of brand value. **Service Continuity:** Difficulty in meeting increasing reporting requirements. **Legal:** Difficulty in complying with reporting standards.	**High**	Short-Medium Term	Adopting a proactive strategy and approach

APPROACH TO CLIMATE CHANGE

Risk Assessment and Financial Impacts

The climate-related risks to which KKB is exposed are assessed under two main headings: physical risks and transition risks. These risks have a wide-ranging impact, extending from operational continuity to cost structure, and from financial performance to reputation management. In particular, the high dependence on energy and infrastructure inherent in the nature of data centre operations make the financial and operational impacts of these risks more pronounced.

Physical Risks

Physical risks are capable of directly affecting KKB's operations through both acute (sudden) and chronic (long-term) impacts. Whilst acute risks, such as extreme weather events, create a risk of disruption to critical infrastructure—particularly data centres and offices—chronic risks, such as rising temperatures and water stress, have more structural impacts on the sustainability of operations.

The risk of operational disruptions caused by extreme weather events represents a critical area for KKB in terms of service continuity and contractual obligations. This risk is not limited solely to the potential costs of disruption; it also has the potential to have indirect effects on insurance costs and reputation. To manage this risk, KKB has invested in highly resilient data centre infrastructure and has safeguarded its critical assets through comprehensive insurance mechanisms. The Tier IV-certified infrastructure is a key outcome of this strategic approach.

Rising temperatures, assessed as a chronic physical risk, create direct cost pressures, particularly through energy consumption in data centre operations. Given the share of cooling systems in total energy consumption, this risk has a persistent impact on operating expenses (OPEX). In this context, the water recovery projects implemented aim to both improve energy efficiency and optimise operational costs.

Operational constraints linked to water scarcity, whilst currently having a more limited financial impact, carry the potential to increase in the long term. In particular, the reliance on water usage in data centre cooling processes heightens the operational significance of this risk. In this context, the water recovery and rainwater harvesting schemes developed stand out as proactive measures aimed at enhancing resource efficiency.

Transition Risks

Transition risks have an impact on KKB's business model and financial performance in line with changes in policy and regulation, technological transformation and shifts in market dynamics. These risks give rise to indirect yet strategic consequences, particularly in relation to energy costs, technology investments and customer expectations.

With the introduction of carbon pricing mechanisms, potential cost increases arising from emissions linked to energy consumption have the potential to place additional pressure on operating expenses. KKB has adopted a proactive approach to this potential risk and, following the reporting period, has procured I-REC certificates to offset its Scope 2 emissions for 2025. This measure is regarded as a precautionary mechanism against potential future carbon costs.

The risk associated with the transition to low-carbon technologies, which is being assessed as part of the technological transformation, represents an area requiring ongoing investment from the KKB's perspective. To ensure that the existing infrastructure can maintain its competitive edge, it is of critical importance that the transition to high-energy-efficiency technologies is carried out in a timely manner. In this regard, KKB regularly continues its investments in IT, R&D and data centres; it aims to manage this risk through Green IT initiatives and investments in renewable energy.

Changes in customer and stakeholder expectations, assessed within the context of market dynamics, are having an impact, particularly through increasing sensitivity regarding transparency, sustainability performance and carbon footprint. Failure to meet these expectations may result in the risk of customer loss and erosion of brand value. In this regard, KKB is adopting a proactive approach by investing in sustainability reporting and the associated transformation processes.

Similarly, the risk that credit risk models may become obsolete in the light of the economic impacts of climate change is of strategic importance to KKB's core business areas. This risk has the potential to affect the performance of products that generate direct revenue. Investments in R&D and model development undertaken in this context aim both to maintain the reliability of existing products and to develop next-generation risk analysis capabilities.

Overall Financial Impact and Approach

Climate-related risks have multi-faceted effects on KKB's financial structure. These effects are primarily manifested through operating expenses (particularly energy and infrastructure costs), capital expenditure (investments in efficiency and technology) and revenue streams (product demand and customer expectations).

KKB addresses these risks not merely as a matter of compliance, but also as a strategic management area. In this context, infrastructure investments, energy efficiency projects, the use of renewable energy and R&D activities are regarded as part of a holistic approach aimed at mitigating the financial impacts of these risks and supporting long-term value creation.

APPROACH TO CLIMATE CHANGE

Low | Medium | High

Opportunity Category	Core Opportunities	Estimated Impact Magnitude	Probability	Time Frame	Actions for Opportunities
Resource Efficiency	Reducing the water footprint and enhancing operational resilience: Reducing water consumption and reusing wastewater to both minimise environmental impact and enhance resilience to water scarcity.	**Medium** **Financial:** Direct savings on water costs. **Reputation:** An image of responsible resource use. **Service Continuity:** Protection against potential water cuts. **Legal:** Proactive compliance with future restrictions.	**Medium**	Short Term	Water recovery project in an adiabatic cooling system; installation and use of rainwater harvesting systems
Resource Efficiency	Zero-waste and circular economy models: Contributing to the circular economy through the effective management and recycling of electronic waste and other materials.	**Medium** **Financial:** Reduction in waste disposal costs **Reputation:** Image of environmental leadership **Service Continuity:** More efficient operational infrastructure **Legal:** Full compliance with waste management regulations	**Medium**	Short-Medium Term	Separation of waste at source and channelling it towards recovery
Products and Services	ESG data analytics and next-generation reporting solutions: Developing new products and services in response to market demand created by new sustainability regulations.	**High** **Financial:** Generating a new revenue stream. **Reputation:** Technological leadership and a visionary brand image. **Service Continuity:** Ensuring the product portfolio is future proof. **Legal:** Providing solutions to customers' legal obligations.	**High**	Short-Medium Term	The development and commercialisation of new ESG-focused products and services, such as "Greendeks"; the integration of data analytics capabilities into the sustainability sector
Resilience	Competitive advantage through climate-resilient infrastructure: Securing a competitive advantage by maintaining operational continuity even under challenging weather conditions, thanks to advanced data centre infrastructure	**High** **Financial:** Protection against significant financial losses; safeguarding revenue streams. **Reputation:** High service reliability and stakeholder trust. **Service Continuity:** Ensuring services are not disrupted. **Legal:** Full compliance with contractual obligations.	**Medium** **High**	Short-Long Term	The continuation of data centre infrastructure investments in accordance with the highest international standards (Tier IV, LEED Platinum); the management of business continuity plans (ISO 22301) taking climate scenarios into account

APPROACH TO CLIMATE CHANGE

4. Key Climate-Related Opportunities and Value Creation Strategy

Tackling climate change entails not only managing risks but also the emergence of new areas for value creation. KKB assesses this transformation through the prism of operational efficiency, new product development and infrastructure investments; it treats climate-focused opportunities as a means of generating strategic growth and competitive advantage.

Resource Efficiency and Operational Effectiveness

Opportunities centred on resource efficiency offer significant potential for KKB in terms of both cost optimisation and enhancing operational resilience. In particular, water management practices stand out as one of the most tangible areas for value creation in this field.

Reducing water consumption and utilising alternative water sources delivers direct and measurable savings on operational costs. Practices such as water recovery and rainwater harvesting in adiabatic cooling systems not only generate cost benefits but are also regarded as a critical resilience factor that supports operational continuity in the face of water scarcity.

Similarly, waste management and circular economy practices also form an important part of the resource efficiency approach. Separating waste at source and channelling it towards recovery reduces disposal costs whilst contributing to more efficient operational processes. The fact that approximately 27 tonnes of waste were diverted for recycling in 2025 demonstrates that initiatives in this area have produced tangible financial and environmental outcomes.

New Growth Areas in Products and Services

Climate and sustainability-focused regulations present new opportunities for KKB to develop products and services. ESG (Environmental, Social, Governance) data analytics and reporting solutions represent a rapidly evolving market segment in line with increasing regulation and customer expectations.

The solutions developed in this context not only generate new revenue streams but also support KKB's positioning as a technology-focused and visionary brand. Products such as 'Greendeks' are among the tangible outcomes of this strategic direction, enabling the commercialisation of data analytics capabilities in the field of sustainability.

Investments in human resources and technology in this area support KKB's ability to offer solutions that comply with future regulations and to develop value-added services for its customers.

Infrastructure Investments and Competitive Advantage

KKB's state-of-the-art data centre infrastructure stands out not only as a risk management tool in the context of climate change, but also as a key factor in creating a significant competitive advantage. Its ability to provide uninterrupted service even under challenging climatic conditions creates critical value in terms of customer trust and service continuity.

Data centre investments designed to the highest international standards (Tier IV and LEED Platinum) minimise the risk of operational disruptions, thereby safeguarding the continuity of revenue streams. This translates into the prevention of large-scale financial losses and the creation of significant financial value through "avoided costs".

Furthermore, the management of business continuity plans (ISO 22301) to include climate scenarios reinforces KKB's proactive approach in this area.

A General Perspective on Value Creation

Climate-related opportunities create value for KKB in three key areas: optimising operational costs, generating new revenue streams and safeguarding existing revenue streams. Whilst resource efficiency measures deliver direct cost benefits, new products and services increase revenue diversification; robust infrastructure investments, meanwhile, safeguard operational continuity and support the sustainability of financial performance.

KKB views these opportunities not merely as an area of environmental responsibility, but also as a strategic lever for enhancing its long-term competitiveness and continues to invest accordingly.

APPROACH TO CLIMATE CHANGE

5. Integrated Risk and Opportunity Management Processes

KKB utilises structured processes, integrated into its overall Corporate Risk Management framework, to manage climate-related risks and opportunities.

Management of Climate-Related Risks

Our process consists of four key steps: Identification, Assessment, Prioritisation and Monitoring.

- **Identification:** This is carried out proactively through both internal workshops and the continuous review of external sources such as IPCC and NGFS reports, regulatory developments and stakeholder expectations.
- **Assessment:** Risks are classified according to their nature (Physical/ Transition), likelihood and time horizon. Quantitative financial modelling is carried out for risks where the potential financial impact could be significant (exceeding the financial materiality threshold set by the Company).
- **Prioritisation:** Climate risks are prioritised holistically, based on the magnitude of their potential impacts, alongside all other corporate risks such as cyber security or market risk, and reported to Senior Management.
- **Monitoring:** The Sustainability Committee monitors progress at a strategic level, whilst relevant departments monitor key performance indicators such as energy consumption, PUE ratio and emissions at an operational level on an ongoing basis.

This integrated approach is the result of the evolution of KKB's risk management processes over time. The qualitative approach, which in previous periods focused primarily on stakeholder expectations, has evolved into a scenario-based, quantitative, financially focused framework that is fully integrated with corporate risk management.

Management of Climate-Related Opportunities

Opportunity management is a proactive process that aligns market needs with our core competencies.

- **Identification**: Regulatory changes, technological developments and customer dialogue are continuously monitored. NGFS scenarios are used to model the scale of market opportunities.
- **Assessment and Prioritisation:** Identified opportunities are prioritised by Senior Management following an analysis of their potential financial value (ROI) and strategic suitability.
- **Implementation and Monitoring:** Approved opportunities are transformed into projects with clear objectives, budgets and responsible teams. Project performance is closely monitored to assess whether the targeted value is being created.

6. Action Plan for the Future and Strategic Priorities

The action plan, developed in line with the findings of the analyses, is structured around three main strategic pillars:

1. **Strategic Resilience and Operational Excellence:** Ensuring the continuity of core services and enhancing operational efficiency.
   - **Actions:** Maintaining the KKB Anadolu Data Centre's current TIER IV and LEED Platinum standards; managing business continuity plans (ISO 22301) whilst taking climate scenarios into account.
2. **Future-Ready Product and Service Portfolio:** Transforming the value proposition into that of a technology company providing climate-enriched risk analytics.
   - **Actions:** To carry out comprehensive R&D projects that will integrate climate-related risks into KKB's core credit risk models (highest strategic priority); to increase the market share of the Greendeks product.
3. **Proactive Compliance and Stakeholder Trust:** To manage legal, political and reputational risks and to respond to stakeholder expectations to the highest standard.
   - **Actions:** Continue purchasing I-RECs to offset Scope 2 (market-based) emissions in order to manage potential carbon pricing risks; continue transparent reporting activities in line with international standards; and lead the sector on international platforms.

All these strategic actions will be financed through the Company's own cash flows and green financing opportunities proactively pursued for strategic investments.

ENERGY AND EMISSIONS MANAGEMENT

KKB's approach to energy and emissions management is structured around improving energy efficiency, promoting the use of renewable energy, and working towards the net-zero carbon target. Under this approach, energy and emissions management are addressed within a systematic framework, and the ISO 14001 standard is actively implemented.

Energy efficiency policies are implemented in line with ISO 14001, as well as the European Union Taxonomy, the BDDK's environmental risk frameworks and LEED standards. Furthermore, a gap analysis has been carried out regarding the transition to the ISO 50001 Energy Management System, and areas for improvement have been identified accordingly. Digitalisation processes are regarded as a critical lever for reducing energy consumption and emissions; thanks to the technological solutions developed, operational efficiency is enhanced whilst environmental impacts are minimised.

Energy Consumption and Operational Profile

As of 2025, KKB's total electricity consumption stood at 42,215,603 kWh. Of this consumption, 22.33% consists of direct consumption under Scope 2, whilst 75.70% comprises Scope 3 consumption linked to customer usage. This distribution demonstrates that KKB's service-based business model is a defining factor in its energy profile.

When assessed by location, 95.42% of total consumption originated from the KKB Anadolu Data Centre, highlighting that energy intensity is largely concentrated in data centre operations. The Istanbul Head Office building accounted for 4.40% of total consumption, whilst the R&D Centre accounted for 0.18%.

Specifically, for the KKB Anadolu Data Centre, 7,642,506.33 kWh of total consumption consists of Scope 2 direct consumption, whilst 32,600,343.03 kWh consists of Scope 3 consumption attributable to customer usage. In addition, 842,583.84 kWh of electricity was generated through the rooftop solar power plant throughout 2025.

To assess operational energy performance more accurately, the energy intensity per employee—calculated taking only Scope 2 consumption into account—was measured at 13,815 kWh per person.

Renewable Energy Use

As of 2025, KKB has sourced all electricity consumed at its Headquarters and KKB Anadolu Data Centre campuses from renewable energy sources certified under the I-REC standard. To this end, KKB has qualified to receive the I-REC International Renewable Energy Certificate. The wider adoption of renewable energy not only contributes to reducing the carbon footprint but also establishes a strategic protection mechanism against potential future carbon costs.

Emissions Management and Carbon Footprint

At KKB, greenhouse gas emissions are systematically measured and monitored in accordance with international standards. Since 2024, carbon footprint calculations covering all locations have been carried out in accordance with the ISO 14064-1 standard.

As of 2025, emissions have begun to be tracked in detail under the Scope 1, Scope 2 and Scope 3 classifications; in particular, the expansion of Scope 3 categories and the enhancement of measurement depth have been identified as priority areas for development.

Total greenhouse gas emissions in 2025 amounted to 20,101.99 tCO_2e according to location-based calculations, following a similar trend to that of 2024 (20,043.53 tCO_2e). Emissions intensity per employee, however, rose from 28.15 tCO_2e/employee to 28.88 tCO_2e/employee.

The fact that the majority of emissions stem from data centre operations – and in particular from Scope 3 activities – highlights that KKB's emissions profile is characterised by a service-based structure.

ENERGY AND EMISSIONS MANAGEMENT

Emissions Reduction and Impact on Performance

The wider adoption of renewable energy has led to a significant reduction in market-based emissions. Thanks to the use of I-REC-certified energy, a total of 17,922.59 tCO_2e of emissions were avoided in 2025; consequently, total market-based emissions fell to 2,179.40 tCO_2e. Emissions intensity per employee was calculated at 3.13 tCO_2e per employee.

These results demonstrate the direct and significant impact of renewable energy use on KKB's carbon footprint.

Operational Practices and Indirect Effects

Energy and emissions management is not limited to energy supply alone but is also supported by operational practices. In this context, the services provided at our sites encourage a reduction in individual vehicle use and aim to lower transport-related emissions.

These types of initiatives contribute to reducing indirect emissions – those arising from sources other than direct energy consumption – thereby strengthening KKB's holistic approach to emissions management.

Thanks to the use of

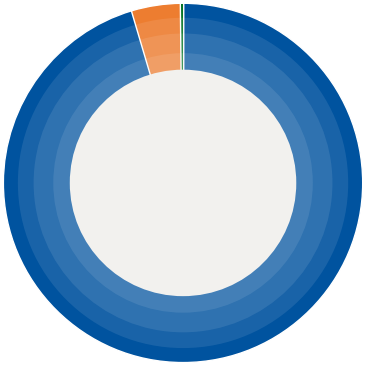
100%

renewable energy at the Head Office and the KKB Anadolu Data Centre,

17,922

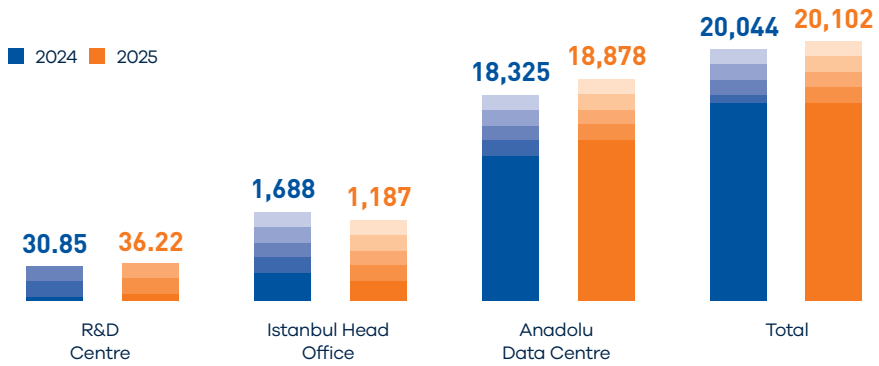
tCO_2e of emissions were avoided in 2025.

Location-based Distribution of Total Energy Consumption (%)



ANADOLU DATA CENTRE (SCOPE 2 + SCOPE 3 + CONSUMPTION FROM SPP GENERATION)	95.42
ISTANBUL HEAD OFFICE (SCOPE 2)	4.4
R&D CENTRE (SCOPE 2)	0.18

Facility-based Distribution of Carbon Emissions (tCO_2e)



WASTE AND WATER MANAGEMENT

At KKB, waste management is addressed in line with the zero-waste approach, with the objective of systematically reducing the environmental impacts arising from operations. In this context, waste is segregated by type across all locations and managed in accordance with the Waste Control and Management Procedure, with disposal carried out through licensed service providers.

The waste management process covers various categories, including municipal waste, packaging waste, toner cartridges, batteries and accumulators, contaminated and medical waste, waste oils, and waste electrical and electronic equipment (WEEE). Appropriate collection, temporary storage, and disposal methods are applied for each waste category. Waste generation and disposal activities are regularly monitored throughout the process. Relevant records are maintained through Waste Tracking Lists and the National Waste Transportation Forms (UATF) and shared with the relevant authorities.

Waste Reduction and the Impact of Digitalization

KKB prioritizes the reduction of waste at source and leverages digitalization as a strategic enabler to achieve this objective. Through applications such as newly developed Digital Document Centre and the Electronic Letter of Guarantee, the flow of physical documents has been significantly reduced, improving operational efficiency while lowering paper and consumables consumption.

In addition, awareness-raising initiatives implemented across the organisation encourage employees to adopt sustainable consumption habits. KKB also promotes practices aimed at increasing the use of reusable products throughout its operations.

2025 Performance: Plastic and Paper Consumption

The year 2025 marked a period of significant improvement, particularly in reducing the consumption of single-use plastics. KKB initiated a transition away from the use of PET bottles in its offices and supported the adoption of reusable alternatives through the installation of water purification systems.

The results of these initiatives demonstrate tangible progress. At the KKB Anadolu Data Centre, PET bottle consumption decreased by 17% compared to the previous year, while the consumption of large bottled water decreased by 81%. At the Istanbul location, despite an increase in the number of employees, PET bottle consumption decreased by 14% and large bottled water consumption decreased by 95%, reflecting substantial improvements.

Regarding paper consumption, a total of 618 reams of A4 paper were used in 2025, representing a 34% decrease compared to the previous year. The amount of paper and cardboard waste generated through operational activities totalled 18.3 tons, of which 7.65 tons were disposed of at the KKB Anadolu Data Centre and 10.65 tons at the Head Office location.

In addition, during 2025, the KKB Anadolu Data Centre disposed of 7.65 tons of cardboard and plastic packaging waste, 3.64 tons of scrap materials, and 6.14 tons of contaminated air filters through licensed waste management providers. At the Head Office, 10.05 tons of cardboard and plastic packaging waste were managed through municipal waste collection services.

> 34%

Reduction in paper consumption compared to the previous year.

WASTE AND WATER MANAGEMENT

Water Management and Efficiency Practices

At KKB, water management is addressed through a holistic approach based on the principles of efficiency, reduction, and reuse. Since 2024, water footprint calculations covering all locations have been conducted in accordance with the ISO 14046 standard, with measurement processes carried out through the 3pmetrics platform.

To reduce operational water consumption, water used in adiabatic cooling systems at the KKB Anadolu Data Centre is recovered and reused. In addition, rainwater harvesting and reuse practices are implemented at both the KKB Anadolu Data Centre and the Head Office locations. While collected rainwater is systematically monitored in Ankara, it is utilized for operational purposes in Istanbul.

Furthermore, the transition from bottled water dispensers to water purification systems contributes simultaneously to reducing both water consumption and plastic use. Complementary measures supporting water efficiency include the use of sensor-activated faucets and low-flow fixtures.

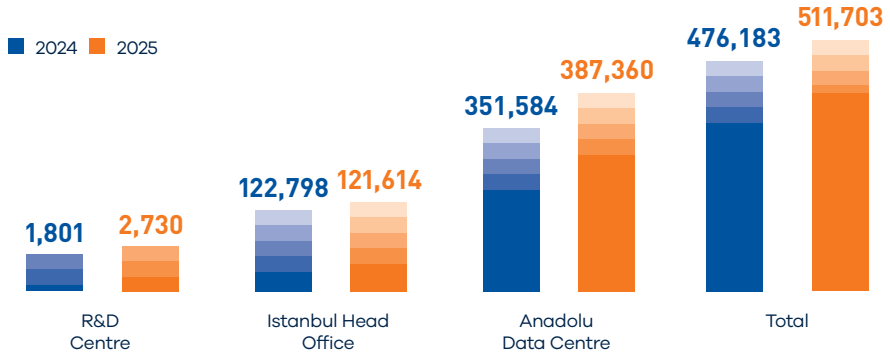
Water Footprint and Operational Impact

KKB's total water footprint amounted to 511,703.45 m^3 in 2025. This figure increased compared to the previous year, primarily due to the increased use of generators because of power outages experienced in Ankara Organized Industrial Zone (OSB).

From a location-based perspective, the majority of the water footprint originated from the KKB Anadolu Data Centre, highlighting the significant influence of Data Centre operations on overall water consumption. The Istanbul locations accounted for a comparatively smaller share of the total water footprint.

These findings indicate that Data Centre operations represent a critical focus area for water management and underscore the strategic importance of concentrating efficiency initiatives on this area.

Water Footprint Distribution by Facility (m^3 Water eq.)



HIGHLIGHTS: SUSTAINABILITY AT THE KKB ANADOLU DATA CENTRE

The KKB Anadolu Data Centre has been designed in line with the principles of energy efficiency, resource management, and operational continuity. The reduction of environmental impacts and the enhancement of infrastructure resilience are addressed through a holistic approach. While compliance with international standards is maintained through the LEED Platinum Green Building Certification, sustainability performance is continuously improved through enhancements in energy, water, and infrastructure systems.

Energy and Emissions Management

Due to its energy-intensive nature and critical operational role, the KKB Anadolu Data Centre is one of the areas where KKB's sustainability approach is implemented most extensively. Accordingly, the Data Centre has been structured around the principles of energy efficiency, resource management, and operational continuity, with a comprehensive focus on reducing environmental impacts and strengthening infrastructure resilience.

Holding the LEED Platinum Green Building Certification, the Data Centre aligns with international standards and systematically enhances its sustainability performance through continuous improvements in its energy, water, and infrastructure systems.

Energy and Emissions Management: High-Efficiency Infrastructure

Energy management at the Data Centre is supported by advanced technological solutions that balance the requirements of uninterrupted operations with the objective of achieving high efficiency. In this context, a DRUPS (Diesel Rotary Uninterruptible Power Supply) system has been deployed for Phase 1, while Static UPS systems were preferred for the initial stage of Phase 2. In addition, fuel polishing practices are implemented to maintain fuel quality and support long-term system reliability.

The cooling infrastructure incorporates free-cooling air handling units supported by adiabatic systems, which utilize external environmental conditions to reduce the need for mechanical cooling and optimize energy consumption. This system is further enhanced by a hot aisle–cold aisle architecture, enabling effective airflow management within the Data Centre. Combined with high-performance insulation applications, these measures help minimize energy losses. In Phase 2, cooling technologies were further strengthened through the deployment of Fan Wall systems and air-cooled chillers to support the increased IT power capacity per rack.

Energy consumption and system performance are monitored in real time through SCADA and Building Management System (BMS) infrastructures, while sub-meters and energy analysers enable detailed consumption tracking. In addition, KNX-based smart lighting systems help prevent unnecessary energy use and improve operational efficiency.

Renewable Energy and Performance Indicators

The use of renewable energy constitutes a key component of the Data Centre's energy strategy. As of 2025, 100% of the electricity consumed was sourced from I-REC-certified renewable energy sources, playing a critical role in reducing the Data Centre's carbon footprint.

During the same period, 2.09% of total energy consumption was met through on-site solar energy systems.

As a result of the energy efficiency measures implemented, the Data Centre achieved a Power Usage Effectiveness (PUE) value of 1.40. This performance indicates that the Data Centre operates at a high level of efficiency, with a significant proportion of total energy consumption being directed to IT equipment.

HIGHLIGHTS: SUSTAINABILITY AT THE KKB ANADOLU DATA CENTRE

Water and Waste Management: A Resource Efficiency Approach

Water management in Data Centre operations is addressed within a systematic framework based on the principles of resource efficiency and circularity. Under the TS EN 50600 certification, Water Usage Effectiveness (WUE) and Water Reuse Efficiency (WRE) indicators began to be monitored in 2025. Both indicators were recorded at 0.000589 m^3 /kWh, demonstrating that water performance has become measurable and comparable.

During the same period, the annual average Energy Reuse Effectiveness (ERE) was 1.40, while the Renewable Energy Factor (REF) reached 2.05, reflecting an integrated approach to energy and water management from an efficiency perspective.

The recovery and reuse of water utilized in adiabatic cooling systems enhance operational water efficiency, while rainwater harvesting practices contribute to reducing municipal water consumption through the use of collected water for landscape irrigation. These initiatives directly support the reduction of the facility's overall water footprint.

Water and waste management practices play a critical role not only in reducing environmental impacts but also in ensuring operational continuity and effective risk management. In this context, preventive measures against flood risks have been implemented through drainage systems located in basement areas, helping to protect critical infrastructure and enhance the facility's resilience to climate-related physical risks.

Overall Assessment: Integrated Sustainability Model

The KKB Anadolu Data Centre represents an integrated sustainability model in which energy, water, and infrastructure management are addressed holistically. When considered together, its high-efficiency technological infrastructure, use of renewable energy, and resource efficiency practices position the Data Centre not only as a critical operational asset but also as one of the key drivers of KKB's sustainability performance.

This integrated structure contributes simultaneously to reducing environmental impacts, ensuring operational continuity, and optimizing costs, thereby supporting long-term value creation.

Anadolu Data Centre Energy Performance – 2025

TOTAL ENERGY CONSUMPTION
40,242,849.36 KWH

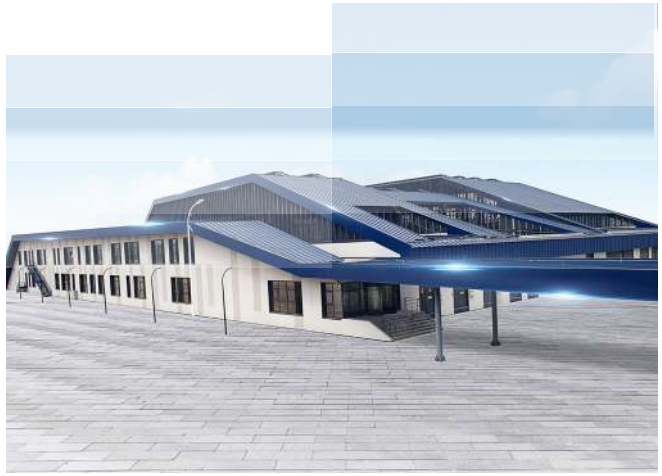
SOLAR POWER GENERATION
842,583.84 KWH

SHARE OF SOLAR ENERGY IN TOTAL CONSUMPTION
2.09%

RENEWABLE ENERGY RATIO
100%*

POWER USAGE EFFECTIVENESS (PUE)
1.40

** All electricity procured from the grid was sourced from I-REC-certified renewable energy sources. Solar power generation is reported separately and is included within total energy consumption.*



SUSTAINABLE FINANCE SOLUTIONS

Sustainable finance plays a critical role in transforming the financial system into a structure that takes environmental and social impacts into consideration. In this context, KKB contributes to the expansion of sustainable finance practices by developing data and analytics infrastructures that support the risk assessment processes of financial institutions.

The effectiveness of sustainable finance products is regularly monitored through indicators such as the number of participating institutions, the number of credit assessments conducted, the volume of credit facilities provided, and overall service utilization levels. These metrics enable the measurement of both product adoption and their impact on the financial system.

To further develop sustainable finance services, KKB engages in national and international collaborations. Memberships in European and Eurasian credit bureau associations, ongoing cooperation with Azerbaijan and Uzbekistan, and working groups established for the Turkish banking sector are among the key initiatives in this area. These collaborations strengthen knowledge sharing and contribute to the development of sustainable finance infrastructure.

In addition, KKB carries out training programmes, conference participation activities, internal communication initiatives, and digital campaigns to raise awareness of sustainable finance. Product training programmes for employees of member institutions and presentations delivered at industry events constitute important components of these efforts.

Green Transformation in Industry Protocol

Within the scope of the Green Transformation Protocol in Industry, a protocol was signed between KKB and the Ministry of Environment, Urbanization and Climate Change to support the sustainable transformation of the industrial sector. The initiative aims to integrate critical environmental data into the financial system, thereby facilitating access to finance.

As part of this collaboration, KKB has undertaken the development of the infrastructure required to provide centralized access, through the Greendeks platform, to air emissions and environmental performance data supplied by the Ministry. This initiative aims to make companies' sustainability data accessible and usable by financial institutions, and to facilitate access to green finance.

GREENDEKS

Greendeks is a sustainability platform that enables companies to measure, improve, and integrate their ESG performance into the financial system. Through sector-specific questionnaires, analytical infrastructure, and action recommendations, the platform guides companies throughout their sustainability journeys. Its carbon footprint calculation module supports the measurement of environmental impacts and facilitates data-driven strategic decision-making.

By making sustainability performance visible, Greendeks enables the use of sustainability data within financial processes. While enhancing corporate transparency, it also supports the credit assessment and risk evaluation processes of financial institutions. In this way, Greendeks serves as a solution that facilitates access to green finance and supports sustainable transformation.

Strong Improvement in Greendeks Performance

Following the reassessments, a significant improvement was recorded in KKB's Greendeks score in 2025. The overall index rating, which was assessed at "B – Good Level of Sustainability" in 2024, improved to "A – Excellent Level of Sustainability" in 2025 as a result of enhancement initiatives and sustainability practices implemented during the year. The improvements achieved in the environmental, social, and sectoral index scores serve as a direct indicator of the concrete steps taken by KKB in the field of sustainability and the effectiveness of its continuous improvement efforts.

Developments in 2025

Throughout 2025, efforts focused on strengthening the technical and content infrastructure of the Greendeks platform, enhancing user experience, and expanding its areas of application across the ecosystem. In this context, the platform was aligned with current reporting frameworks and further developed to address evolving sustainability reporting requirements and green transformation expectations.

To improve user experience, an AI-powered chatbot solution was introduced. Through "Greeny," positioned as Greendeks' digital assistant, users received real-time guidance throughout the assessment process. Educational videos integrated into the assessment forms helped users manage processes more accurately and effectively, while the launch of the Customer Communication Centre strengthened the platform's multi-channel support structure.

To expand platform adoption, collaborations were established across various sectors, accompanied by training and awareness-raising initiatives. In this regard, Greendeks contributed to the "From Risk to Opportunity: Twin Transformation Training Program" conducted in collaboration with Türkiye İMSAD, providing comprehensive information on sustainability reporting and compliance with CSRD, ESRS, and TSRS requirements.

In addition, a presentation delivered at the Sustainable Banking Conference organized by the Banking Regulation and Supervision Agency (BDDK) highlighted the role of ESG data in financial decision-making processes and the value that the Greendeks infrastructure can bring to the sector.

As part of efforts to expand the platform's use across different industries, a collaboration with AKİŞ REIT enabled the measurement of ESG performance across the shopping mall ecosystem, including tenants, suppliers, and business partners. The results were supported through certification processes and action plans designed to improve sustainability performance. Through this initiative, the sustainability performance of an entire shopping mall value chain was measured using an index-based approach for the first time in Türkiye.

A significant milestone was also achieved in the field of sustainable finance through the integration of the Greendeks Score into credit processes. Under the Green Export Loan programme developed in collaboration with the Credit Guarantee Fund (KGF) and Ziraat Bank, the Greendeks Score began to be used as one of the key indicators in credit assessment processes. This integration established an objective framework linking access to finance with ESG performance and positioned sustainability criteria as a driver of economic value creation.

To enhance digital visibility, the greendeks.com website and social media channels were activated, and a structure was established to monitor brand perception and user feedback across digital platforms. Insights obtained through these channels supported platform development efforts and enabled continuous improvements aligned with user needs.

Looking ahead, Greendeks aims to deepen its integration with financing mechanisms, support SMEs in their green transformation journeys, and strengthen the link between sustainability performance and economic value creation. At the same time, the platform plans to further enhance its end-to-end digital capabilities and establish an infrastructure that enables companies to manage their sustainability processes independently.

PROTECTING VALUE

CORPORATE GOVERNANCE

KKB operates with the awareness that sustainable value creation is only possible through a strong governance structure and effective risk management. In line with corporate governance principles, KKB adopts a transparent, accountable and responsible management approach.

Through its proactive risk management approach, financial, operational and technological risks are continuously monitored and managed. In this way, KKB ensures service continuity while also contributing to the stability of the financial system.

A strong governance structure supports the sustainability of KKB's trust-based value creation.

Area	Content
Significance for KKB	Ensuring Corporate Sustainability
Risks	Regulatory breaches, operational risks
Opportunities	Increased stakeholder trust, corporate stability
Impact Magnitude	High
Management Structure	Board of Directors, Risk Committee, Internal Audit
KPIs	Board of Directors meeting frequency: 11 times per year Number of regulatory non-compliance cases: 0 Number of data security breaches: 0 Number of active suppliers: 600 Business continuity testing frequency: At least once a year Number of Ethics Hotline reports: 0

KKB operates with the awareness that sustainable value creation is enabled through a strong corporate governance structure, effective risk management and robust oversight mechanisms. The Board of Directors, committees and senior management are responsible for overseeing all risks and opportunities in line with the organization's strategic objectives, risk appetite and sustainability priorities.

Within this scope, risk management, internal control, compliance and sustainability processes are regularly addressed and evaluated at the Board of Directors level. KKB's governance model is structured in accordance with the principles of transparency, accountability and responsibility, ensuring the secure, uninterrupted and sustainable delivery of data infrastructure services that are critical to the financial system.

Detailed information on KKB's corporate governance structure, Board of Directors and Senior Management can be found in the Annual Reports.

Oversight Through the Board of Directors and Committee Structure

At KKB, the Board of Directors holds ultimate oversight responsibility for risks and opportunities, supported by specialized committees. The Audit Committee regularly evaluates Information Risk Management, Internal Control and Internal Audit activities and reports its findings to the Board of Directors.

Structures such as the Information Security Committee, Business Continuity Committee and Data Governance Committee provide oversight on operational resilience, data security and system continuity. The Sustainability Committee plays an active role in identifying environmental, social and governance risks and opportunities, monitoring performance and supporting strategic guidance processes.

Through this structure, KKB ensures the early identification of risks, their effective management and their integration into strategic decision-making processes.

CORPORATE GOVERNANCE

Risk Management

At KKB, risk management is structured as an integrated framework aligned with the COSO ERM and ISO 31000 standards, integrated with corporate strategy and continuously improved. Risks are monitored and reported through the GRC (Governance, Risk, Compliance) application.

Risks are addressed holistically under the categories of financial, operational, technological, cybersecurity, compliance, reputational and sustainability risks. Risk scores are established using impact and likelihood criteria within risk assessment processes, and action plans are developed for critical risks.

Risk management outcomes are regularly reported to senior management and relevant committees, ensuring that risks become an integral part of decision-making processes. KKB operates within the defined risk appetite framework, and deviations are monitored accordingly.

As of 2025, sustainability and climate risks have been integrated into the risk management system, expanding its scope. The impacts of physical and transition risks on Data Centre operations, business continuity and the financial system have been analysed.

Key Practices Highlighted in 2025

AI-Supported Audit and Control

KKB actively utilizes data analytics and artificial intelligence applications in its internal audit and internal control processes. Anomaly detection is performed across large data sets, and advanced algorithms are applied to identify fraud risks. The machine learning-supported audit approach enhances control effectiveness and enables the early detection of risks.

Supplier ESG Evaluation Model (TOPSIS)

KKB has developed a model based on the TOPSIS (Technique for Order Preference by Similarity to Ideal Solution) methodology to systematically incorporate environmental, social and governance criteria into supplier selection and evaluation processes. Within the scope of this model, suppliers are assessed based on multi-dimensional criteria such as energy consumption, carbon intensity, occupational health and safety, ethics and compliance, and their sustainability performance is analysed.

Through this approach, KKB aims to manage sustainability risks across the supply chain more effectively and foster responsible business partnerships.

Data Centre and Operational Resilience

KKB Anadolu Data Centre, located in Ankara and holding TIER IV certification, forms the foundation of operational continuity with its high availability and security standards. Service continuity is ensured through redundant energy infrastructure, geographic redundancy and disaster recovery systems. With the ongoing Phase 2 investment as of 2025, KKB aims to further enhance capacity and resilience.

Operational Continuity and Information Security

At KKB, business continuity, information security and service management processes are managed within an integrated framework. In line with ISO 27001, ISO 22301 and ISO 20000 standards, critical processes are regularly tested and improved. Critical services are identified through business impact analyses, recovery times are defined, and scenarios are tested regularly. This approach strengthens organizational resilience against potential disruptions and crisis situations.

Ethics, Compliance and Anti-Bribery

KKB conducts its operations in accordance with ethical principles and regulatory requirements. Through the "Compliance by Design" approach, legal requirements are taken into consideration from the design stage of new product and service development processes.

Mechanisms have been established for reporting ethical violations, and all reports are evaluated in line with the principles of confidentiality and impartiality.

Practices related to ethical principles are governed by the "KKB Ethics Reporting Policy." With the planned publication of the "KKB Code of Ethics and KKB Human Rights Policy" in 2026, a more comprehensive framework is expected to be established.

Within the scope of anti-bribery and anti-corruption efforts, controls are implemented and regular audits are conducted regarding gift acceptance, conflicts of interest and the provision of inappropriate benefits, in accordance with established rules.

In 2025, KKB did not incur any penalties arising from non-compliance with laws and regulations.

VALUE FOR PEOPLE

KKB believes that human capital is at the foundation of sustainable success. Accordingly, the Company embraces a corporate culture that strengthens employee experience, promotes diversity and inclusion, and encourages continuous development.

While employee engagement is supported through training and development programmes, equal opportunity and an inclusive work environment remain among the Company's key priorities.

In addition, KKB continues to contribute to social well-being through social responsibility projects and volunteering activities. Its people-oriented approach forms the foundation of the Company's commitment to creating value for society.

Area	Content
Significance for KKB	Human resources and corporate culture
Risks	Talent loss Low employee engagement Lack of critical competencies
Opportunities	Increased innovation capacity Operational efficiency Strong employer brand Development of data and AI capabilities
Impact Magnitude	Medium-High
Management Structure	Human Resources, Senior Management
KPIs	Employee Turnover Rate (%) – 10.2 Female Employee Ratio (%) – 38.1 Female Representation on the Board of Directors (%) – 30 Average Training Hours per Employee – 28.9 Training Satisfaction Score – 4.4/5 Total Volunteer Hours – 387

KKB believes that human capital is central to sustainable success and positions this approach at the core of its value creation model. In this direction, the Company adopts a holistic corporate culture that enhances employee experience, supports diversity and inclusion, and encourages continuous improvement.

Employee engagement is systematically supported through training and development programmes, while equal opportunity and an inclusive workplace remain among KKB's fundamental priorities.

KKB extends its people-oriented approach beyond internal practices and continues to contribute to social well-being through social responsibility projects and volunteering activities. In this respect, the human-centred approach is regarded as a key driver of both organizational performance and societal value creation. Human capital is considered a critical component of KKB's long-term value creation capacity and is monitored in relation to financial performance.

Governance and Oversight

At KKB, human resources management is addressed through a strong and multi-layered governance structure. While the Human Resources function is responsible for executing operational practices, senior management plays an active role in defining and guiding human capital strategies. Within this structure, key performance indicators are regularly monitored and reported to senior management.

In line with IFRS requirements, key human capital KPIs, including employee engagement, turnover rate, and diversity indicators, are regularly tracked and presented to senior management. Human capital-related risks are assessed within the framework of enterprise risk management, while employee data is actively utilized in decision-making processes. Within this scope, human resources analytics and data-driven decision-support systems have been developed, and the use of digital solutions and artificial intelligence-supported analyses in critical human resources processes has started to expand.

Strategic Priorities and Integration with the Business Model

KKB's human resources approach is directly linked to organizational efficiency, employee experience, talent management, and innovation capacity. Human capital is considered one of the key inputs in innovation and product development processes, while capability development in data, analytics, and technology teams is positioned as a strategic priority. This approach aims to sustainably strengthen the Company's competitive advantage.

Employee Profile and Organizational Structure

With a total workforce of 696 employees, KKB has a balanced organizational structure comprising different age groups and levels of experience. Among its employees, 204 are under the age of 30, 467 are between the ages of 30 and 50, and 25 are over the age of 50. This distribution reflects an organizational structure that brings together both young talent and experienced professionals.

In terms of gender distribution, 262 employees (38%) are women and 436 employees (62%) are men. Across entry-level, middle, and senior management positions, there are 45 female and 92 male managers. Of the 10 members of the Board of Directors, 3 are women. The proportion of female managers is 33%. Increasing female representation remains among the Company's priority areas for improvement.

Female Representation in Management

KKB employs 15 employees with disabilities, representing a tangible reflection of the Company's commitment to an inclusive workplace approach.

During the construction of the new phase investment of the KKB Anadolu Data Centre, 267 subcontractor employees are involved in the project. At KKB's operating locations, outsourced personnel support is periodically provided for services such as pest control, equipment maintenance, and cleaning. Occupational health and safety specialists and the Company physician provide support on designated days of the week.

262 (38%)
Number of female employees

436 (62%)
Number of male employees*

45
Number of female managers*

30%
Female representation on the Board of Directors

32.9%
Female manager ratio

** All management levels, including first-line, middle, and senior management, are taken into consideration.*

Employee Experience

At KKB, employee experience is structured around fair compensation policies, inclusive benefits, flexible working models, and practices that support employee well-being. The hybrid working model, implemented since 2022, has been further enhanced with flexibility measures supporting work-life balance.

Employee benefits include private health insurance, individual pension plan (BES) contributions, education and postgraduate support, performance bonuses, and flexible benefits programmes. In addition, employee experience is regularly measured through surveys and data analytics methods, and the resulting engagement and satisfaction outcomes are translated into action plans.

Diversity and Inclusion

KKB considers diversity and inclusion as fundamental elements of its corporate culture and implements anti-discrimination policies accordingly. The principle of equal opportunity is embedded across all human resources processes, while the employment of individuals with disabilities is actively supported.

The proportion of female employees is 38%, and increasing this ratio remains among the Company's key objectives. Within this scope, collaborations have been established with the Women in Technology Association and the Private Sector Volunteers Association.

Through the Young Talent Program, a total of 126 participants were reached, achieving an 80% retention rate. In 2025, the "KKB Hackathon: Agentic AI" event was attended by 1,200 students and 314 teams, with artificial intelligence-supported methods utilized throughout the evaluation processes. In addition, diversity indicators are regularly monitored and reported, while data-driven equality analyses are conducted in recruitment and promotion processes.

Training and Development

2,175.5
hours of instructor-led training (in-person and online)*

Based on 323 different training programmes.

KKB approaches employee development through a systematic and data-driven framework. As of 2025, the average training duration per employee was 28.90 hours. This figure was measured as 29.96 hours for female employees and 28.11 hours for male employees. The effectiveness of training programmes is supported by a training satisfaction score of 4.4 out of 5.

Within the scope of instructor-led training programmes (both in-person and online), a total of 2,175.5 training hours were delivered through 323 different training programmes.

Training satisfaction score:
4.4 out of 5

Across the organization, the LinkedIn Learning platform is available to all employees, while technical training platforms such as Pluralsight, INE, and Interskill are actively utilized. In addition, internal training programmes are provided through the Journey and KKB Training Platform, while leadership development programmes, coaching, and mentoring practices support employee growth and development.

During 2025, 214 employees participated in national and international events, 458 employees took part in 45 different training programmes, and 174 employees completed agile methodology training programmes.

Training and development processes are monitored through data analytics, while competency mapping and individual development plans are managed through digital platforms.

Average Training Hours

29.96
Female employees (per person)

28.11
Male employees (per person)

28.90
Average training hours per employee

Education and Development Indicators

214
Number of employees participating in events

458
Number of employees participating in catalog training programmes

45
Number of catalog training sessions

174
Number of employees completing agile methodology training

Occupational Health and Safety (OHS)

KKB considers occupational health and safety (OHS) an integral part of its corporate culture. OHS committees are established across all locations, regular risk assessments are conducted, and full compliance with applicable legal requirements is ensured. Employee health and safety are supported through emergency response plans and regular drills, ergonomic working environments, and mini health check-up practices. In addition, OHS risks are integrated into the enterprise risk management system, and critical indicators are regularly reported to senior management.

As of 2025, KKB achieved zero occupational accidents, zero injuries, and zero lost days. This performance is considered a reflection of the Company's proactive risk management approach.

During the year, an Emergency Preparedness Awareness Seminar was also organized. The Search and Rescue Team established to support effective response in emergency situations has strengthened KKB's capacity for social support and intervention.

TOTAL NUMBER OF EMPLOYEES

698 employees

EMPLOYMENT OF PEOPLE WITH DISABILITIES

15 employees

PERCENTAGE OF WOMEN IN MANAGEMENT POSITIONS

33.1%

NUMBER OF MANAGERS*

Woman	Men
45	92

All management levels: entry-level, middle management, and senior management

Corporate Social Responsibility

KKB positions creating social value among its priorities in line with its corporate social responsibility approach. Volunteer projects carried out in the areas of education, health, environment, and social inclusion, with the active participation of employees, contribute both to increasing social awareness and creating sustainable social value.

Throughout the year, numerous volunteer projects focusing on different areas were implemented:

- **Goodness Bazaar:** As part of World Volunteer Day on December 5, a charity bazaar was organized at KKB Headquarters with the participation of four different non-governmental organizations. In addition to providing financial support, the event contributed to increasing the visibility of social impact.
- **Computer Donation Project:** Idle computers in KKB's inventory were refurbished through a comprehensive renewal process and delivered to 11 schools in 9 cities identified based on recommendations from non-governmental organizations and employees.

Within the scope of the project, more than 3,000 students gained access to the digital world, supporting equal opportunities in education. In addition, 2,000 books were donated to school libraries. A volunteer team of 27 employees shared their knowledge and experience on topics such as digital literacy, conscious use of technology, and future professions.

- **Kindergarten Needs Support Project:** Implemented with the contribution of 95 volunteer employees, the project addressed the needs of three village schools across 81 categories of requirements.
- **Linocut Printing Workshop:** Organized in collaboration with the Turkish Cancer Association, the workshop enabled KKB Volunteers to prepare and donate tote bags to patients undergoing treatment. In addition, care packages were delivered to 25 children.
- **Baby Elephant Ribbon Workshop:** As part of an awareness workshop conducted in collaboration with the Turkish Spastic Children's Foundation, one month of special education and rehabilitation services was provided for two children.
- **Kurtaran Ev Animal Shelter Visit:** Within the scope of World Animal Protection Day on October 4, KKB visited the Kurtaran Ev Association's shelter facility and provided food donations.
- **Happy Tales: Laughter Heals:** As part of the project carried out in collaboration with the Laughter Heals Association, stories narrated by volunteer employees were delivered to 30 children with the aim of providing emotional support and encouragement to children facing serious illnesses.
- **47th Istanbul Marathon:** A 23-member KKB running team participated in the marathon to raise donations for the TEMA Foundation's "Before It Burns – Forest Fires Education and Awareness Project." A total of TRY 127,500 in donations was collected and KKB ranked among the top 10 institutions with the highest amount of donations raised.

2025 Social Impact and Volunteerism Indicators

Number of NGOs supported	Volunteer participation rate in projects
14	62%

Total Value Added

1,280,955 TL

Total number of volunteers	Total volunteer hours
266	387
(35% increase compared to the previous year)	(37.2% increase compared to the previous year)

PERFORMANCE INDICATORS

Environmental Performance Indicators

ENERGY

Energy Consumption and Intensity Indicators	2022	2023	2024	2025
Electricity Consumption (kWh)	30,481,045	35,769,922	41,259,617	42,215,603
Anadolu Data Centre *	27,931,211	33,190,946	38,871,163	40,242,849
İstanbul Head Office	2,549,834	2,578,976	2,322,519	1,896,022
R&D Centre	N/A		65,936	76,732
Energy Consumption per Employee (kWh/person)	55,420	52,758	58,194	60,654**

Fuel Consumption (litres)	2022	2023	2024	2025
Generator – Diesel	73,460	21,302	24,602	44,528
Gasoline	29,700	47,470	90,300	87,939
Company Vehicles	29,700	47,470	85,354	82,789
Operational Vehicles			4,946	5,151
Diesel (litres)	41,060	23,440	2,520	1,540
Company Vehicles	41,060	23,440	1,174	1,257
Operational Vehicles			1,346	283

**Solar power generation is included.*

***As total energy consumption includes customer usage, the kWh per person figure does not represent consumption per employee. Emissions intensity per person was calculated as 2.186 tCO_2 e per employee by dividing Scope 1 and 2 emissions by the number of employees.*

GREENHOUSE GAS EMISSIONS

Greenhouse Gas Emissions and Intensity Indicators	2022	2023	2024	2025
Total Emissions (tCO_2e)*	**16,010**	**18,130**	**20,044**	**20,102**
Scope 1	16,010	18,130	2,055	1,566
Scope 2			2,140	4,173
Scope 3			15,848	14,363
Market-Based	N/A	N/A	N/A	2,179
Facility-Based Emissions Breakdown (tCO_2e)	**16,010**	**18,130**	**20,044**	**20,102**
R&D Centre	1,510	1,530	30.85	36.22
İstanbul Head Office			1,688	1,187
Anadolu Data Centre	14,500	16,600	18,325	18,878
Emissions Intensity per Employee (tCO_2e/person)	**N/A**	**N/A**	**28.15**	**28.88****

**Until 2024, no distinction was made between scopes in emissions calculations; with the update of the calculation tool to 3pmetrics as of 2024, monitoring and reporting began to distinguish between Scopes 1, 2 and 3. In 2025, with the transition to the use of I-REC-certified renewable energy, market-based emissions calculations also commenced.*

***For market-based emissions, the greenhouse gas intensity per employee stood at 3.13 tCO_2 e/employee.*

Distribution of Greenhouse Gas Emissions by Facility and Scope for 2025 (tCO_2e)	Scope 1	Scope 2	Scope 3	Market-Based
R&D Centre	1.72	33.3	1.2	36.22
İstanbul Head Office	293.28	822.87	71.33	364.6
Anadolu Data Centre	1,271.46	3,316.85	14,289.98	1,778.58
Total	**1,566.46**	**4,173.02**	**14,362.51**	**2,179.40**

PERFORMANCE INDICATORS

Greenhouse Gas Emissions Reductions from the 2025 I-REC (tCO_2e)	
Anadolu Data Centre (Scope 2)	2,951.17
Anadolu Data Centre (Scope 3)	14,148.55
İstanbul Head Office	822.87
Total	**17,922.59**

WATER

Facility-Based Water Footprint (m^3 water equivalent)	2022*	2023	2024**	2025
Anadolu Data Centre	759,000	233,000	351,584	387,360
İstanbul Head Office	626,000	609,000	122,798	121,614
R&D Centre			1,801	2,730
Total	**1,385,000**	**842,000**	**476,183**	**511,703**

**The increase in 2022 was due to the use of generators following a power cut at the Ankara OSB.*

*** As of 2024, water usage and water footprint data for the Istanbul site have begun to be broken down by the Istanbul Head Office and the R&D Centre. During this period, in addition to this breakdown, location-based measurement methods were developed; furthermore, the measurement tools and database infrastructure were updated.*

WASTE

Waste Amount by Type (kg)	2022	2023	2024	2025
Non-hazardous Waste	19,010	16,430	26,320	21,340
Hazardous Waste*	5,860	11,260	3,620	6,140
Total	**24,870**	**27,690**	**29,940**	**27,480**

**Hazardous waste consists mainly of contaminated air filters.*

Social Performance Indicators

Human Resources Data

Employee Demographics (by age, education, job position and gender)		2024	2025
Distribution of Employees by Gender			
Board of Directors			
	Women	2	3
	Men	8	7
Senior Management			
	Women	3	3
	Men	9	7
Unit Managers			
	Women	9	10
	Men	18	17
Team Managers			
	Women	37	29
	Men	54	61
Permanent Employees			
	Women	270	262
	Men	439	434
Contract Employees			
	Women	6	0
	Men	3	2

PERFORMANCE INDICATORS

Employee Distribution by Education Level		2024	2025
Doctorate			
	Women	2	2
	Men	3	3
Master's Degree			
	Women	45	44
	Men	72	68
Bachelor's Degree			
	Women	196	186
	Men	274	263
Associate Degree			
	Women	11	11
	Men	53	59
High School and Below			
	Women	16	19
	Men	37	41

Employee Distribution by Age	2024	2025
Under 30 Years Old	206	204
30–50 Years Old	474	467
Over 50 Years Old	29	25

New Hires		2024	2025
Under 30 Years Old			
	Women	36	6
	Men	65	18
30–50 Years Old			
	Women	7	14
	Men	2	22
Over 50 Years Old			
	Women	0	0
	Men	0	0
Total			
	Women	43	20
	Men	67	40

Employee Tenure		2024	2025
Employees with Up to 5 Years' Service			
	Women	167	154
	Men	284	282
Employees with 5–10 Years of Service			
	Women	76	65
	Men	100	84
Employees with 10+ Years of Service			
	Women	27	43
	Men	55	68

PERFORMANCE INDICATORS

	2024	2025
Employee Turnover Rate (%)	8.8%	10.2%
Percentage of Female Employees in Total Workforce (%)	38.1%	37.6%
Percentage of Female Managers in Total Management (%)	37.7%	33.1%
Number of Employees with Disabilities	11	15
Women	2	3
Men	9	12

Number of Employees Taking and Returning from Maternity Leave (Persons)	2024	2025
Number of Employees Returning from Leave	0	1
Number of Employees Who Have Not Yet Returned to Work	6	6
Number of Employees Taking Maternity Leave	6	7

Training Data		
Average Training Hours per Employee (hours/person)		
Average Training Hours per Employee*		28.9
Average Training Hours per Employee by Gender		
	Women	29.96
	Men	28.11
Total Classroom Training Hours (On-the-Job, Personal, Technical) (hours)**		2,175.5
Total Online Training Hours		3,345
Enocta		1,175
Linkedin Learning		1,923
Journey		247

**Includes all employees who participated in face-to-face and online training during 2025. This includes employees who left the company, short-term interns, and temporary employees.*
***Based on the total training hours of 323 different training programs.*

Occupational Health and Safety Indicators	2024	2025
Occupational Accident and Accident Rates by Type		
Injury Cases	-	-
Number of Fatalities	-	-
Lost Days	-	-
Lost Day Rate	-	-
Accident Frequency Rate	-	-
Accident Severity Rate	-	-

GRI CONTENT INDEX ESSENTIALS SERVICE 2026

GRI CONTENT INDEX

For the Content Index – Essentials Service, GRI Services reviewed that the GRI content index has been presented in a way consistent with the requirements for reporting in accordance with the GRI Standards, and that the information in the index is clearly presented and accessible to the stakeholders. This service was performed on the Turkish version of the report.

Statement of Use	KKB has prepared its report covering the period January 1, 2025 - December 31, 2025 in accordance with GRI Standards.
GRI 1 Used	GRI 1: Foundation 2021
Applicable GRI Sector Standard(s)	/

GRI STANDARD / OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION		
			Requirement(S) Omitted	Reason	Explanation
General Disclosures					
GRI 2: General Disclosures 2021	2-1 Organizational details	KKB at a Glance, page 8; Shareholding Structure, page 10			
	2-2 Entities included in the organization's sustainability reporting	About the Report, page 3			
	2-3 Reporting period, frequency and contact point	About the Report, page 3			
	2-4 Restatements of information	GRI Content Index: There is no restated information.			
	2-5 External assurance	GRI Content Index: No external audit has been conducted.			
	2-6 Activities, value chain and other business relationships	KKB at a Glance, page 8; Shareholding Structure, page 10; Members, page 10 KKB 2025 Annual Report, Our Activities; page: 38-55 https://www.kkb.com.tr/en/reports-and-publications			
	2-7 Employees	Employee Profile and Organizational Structure, page 60			
	2-8 Workers who are not employees	Employee Profile and Organizational Structure, page 60			
	2-9 Governance structure and composition	KKB 2025 Annual Report, Management; page: 16-27 https://www.kkb.com.tr/en/reports-and-publications			
	2-10 Nomination and selection of the highest governance body	Corporate Governance, page 56 https://www.kkb.com.tr/en/about-us			
	2-11 Chair of the highest governance body	KKB 2025 Annual Report, Management; page: 11,16 https://www.kkb.com.tr/en/reports-and-publications Oversight Through the Board of Directors and Committee Structure, page 56			
	2-12 Role of the highest governance body in overseeing the management of impacts	Governance and Monitoring Mechanism, page 14; Oversight Through the Board of Directors and Committee Structure, page 56			

GRI CONTENT INDEX

GRI STANDARD / OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION		
			Requirement(S) Omitted	Reason	Explanation
GRI 2: General Disclosures 2021	2-13 Delegation of responsibility for managing impacts	Governance and Monitoring Mechanism, page 14; Oversight Through the Board of Directors and Committee Structure, page 56			
	2-14 Role of the highest governance body in sustainability reporting	Governance and Monitoring Mechanism, page 14; Oversight Through the Board of Directors and Committee Structure, page 56			
	2-15 Conflicts of interest	Ethics, Compliance and Anti-Bribery, page 57			
	2-16 Communication of critical concerns	About the Report, page 3; Our Value Creation Approach with Our Stakeholders, page 19; Ethics, Compliance and Anti-Bribery, page 57; Materiality Approach, page 15-16			
	2-17 Collective knowledge of the highest governance body	Governance and Monitoring Mechanism, page 14; Oversight Through the Board of Directors and Committee Structure, page 56			
	2-18 Evaluation of the performance of the highest governance body	Governance and Monitoring Mechanism, page 14			
	2-19 Remuneration policies	Governance and Monitoring Mechanism, page 14; Employee Experience, page 60 https://www.kkb.com.tr/en/human-resources			
	2-20 Process to determine remuneration	Governance and Monitoring Mechanism, page 14; Employee Experience, page 60 https://www.kkb.com.tr/en/human-resources			
	2-21 Annual total compensation ratio	Governance and Monitoring Mechanism, page 14; Employee Experience, page 60 https://www.kkb.com.tr/en/human-resources			
	2-22 Statement on sustainable development strategy	Message from the Chairperson, page 4; Message from the General Manager, page 5-6; KKB's Approach to Sustainability, page 13; Our Strategic Focus Areas, page 9; Our Sustainability Targets, page 20-21			
	2-23 Policy commitments	KKB's Approach to Sustainability, 13-14; Our Strategic Focus Areas, page 17; Our Sustainability Targets, page 20-21 https://www.kkb.com.tr/en/certificates			
	2-24 Embedding policy commitments	KKB's Approach to Sustainability, 13-14; Our Strategic Focus Areas, page 17; Our Sustainability Targets, page 20-21 https://www.kkb.com.tr/en/certificates			
	2-25 Processes to remediate negative impacts	KKB's Approach to Sustainability, 13-14; Materiality Approach, page 15-16; Our Strategic Focus Areas, page 17; Our Value Creation Approach with Our Stakeholders, page 19; Our Sustainability Targets, page 20-21			
	2-26 Mechanisms for seeking advice and raising concerns	About the Report, page 3; Our Value Creation Approach with Our Stakeholders, page 19; Ethics, Compliance and Anti-Bribery, page 57			

GRI CONTENT INDEX

GRI STANDARD / OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION		
			Requirement(S) Omitted	Reason	Explanation
GRI 2: General Disclosures 2021	2-27 Compliance with laws and regulations	GRI Content Index: During the reporting period, there were no incidents of non-compliance with laws and regulations and no penalties were imposed for non-compliance with laws and regulations. Ethics, Compliance and Anti-Bribery, page 57			
	2-28 Membership associations	KKB at a Glance, page 8; Our Value Creation Approach with Our Stakeholders, page 19			
	2-29 Approach to stakeholder engagement	Our Value Creation Approach with Our Stakeholders, page 19			
	2-30 Collective bargaining agreements	GRI Content Index: There is no collective labor agreement.			
Material Topics					
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Identification of Material Issues, page 15-16			
	3-2 List of material topics	Identification of Material Issues, page 16			
Data Security and Responsible Data Management					
GRI 3: Material Topics 2021	3-3 Management of material topics	Identification of Material Issues, page 15-16; Secure and Responsible Data Management, page 23			
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	GRI Content Index: During the reporting period, there were no substantiated complaints regarding breach of customer confidentiality and loss of customer data.			
Value for Financial Life					
GRI 3: Material Topics 2021	3-3 Management of material topics	Identification of Material Issues, page 15-16; Inclusion and Ecosystem, page 31; Financial Inclusion, page 32; Findeks, page 33			
GRI 203: Indirect Economic Impacts 2016	203-2 Significant indirect economic impacts	Financial Inclusion, page 32; Findeks, page 33; Greendeks, page 54			
Climate and Sustainable Finance Transformation					
GRI 3: Material Topics 2021	3-3 Management of material topics	Identification of Material Issues, page 15-16; Climate and Sustainable Finance Transformation, page 38 ; Approach to Climate Change, page 39; Sustainable Finance Solutions, page 53			
GRI 201: Economic Performance 2016	201-2 Financial implications and other risks and opportunities due to climate change	Managing Climate Risks and Opportunities, page 39-46			

GRI CONTENT INDEX

GRI STANDARD / OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION		
			Requirement(S) Omitted	Reason	Explanation
GRI 302: Energy 2016	302-1 Energy consumption within the organization	Energy Consumption and Operational Profile, page 47; Environmental Performance Indicators, page 63			
	302-4 Reduction of energy consumption	Energy and Emissions Management, page 47-48			
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	Waste and Water Management, page 49-50			
	303-5 Water consumption	Waste and Water Management, page 49-50; Environmental Performance Indicators, page 64			
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Energy and Emissions Management, page 47-48; Environmental Performance Indicators, page 63			
	305-2 Energy indirect (Scope 2) GHG emissions	Energy and Emissions Management, page 47-48; Environmental Performance Indicators, page 63			
	305-3 Other indirect (Scope 3) GHG emissions	Energy and Emissions Management, page 47-48; Environmental Performance Indicators, page 63			
	305-5 Reduction of GHG emissions	Energy and Emissions Management, page 47-48			
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	Waste and Water Management, page 49-50			
	306-2 Management of significant waste-related impacts	Waste and Water Management, page 49-50			
	306-3 Waste generated	Waste and Water Management, page 49-50; Environmental Performance Indicators, page 64			
	306-4 Waste diverted from disposal	Waste and Water Management, page 49-50 GRI Content Index: As of 2025, 7,650 kg of paper and plastic packaging waste, 3,640 kg of scrap material and 6,140 kg of contaminated air filters from the Ankara site, and 10,050 kg of paper and plastic packaging waste from the Istanbul site were sent to local authorities and licensed recycling organisations.			
Risk Management and Corporate Governance					
GRI 3: Material Topics 2021	3-3 Management of material topics	Identification of Material Issues, page 15-16; Protecting Value, page 56-57; Corporate Governance, page 56			
GRI 205: Anti-corruption 2016	205-3 Confirmed incidents of corruption and actions taken	Ethics, Compliance and Anti-Bribery, page 57			

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GRI STANDARD / OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION		
			Requirement(S) Omitted	Reason	Explanation
People and Organization					
GRI 3: Material Topics 2021	3-3 Management of material topics	Identification of Material Issues, page 15-16; Value For People, page 59			
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Our Sustainability Targets, page 20-21 Social Performance Indicators, page 66			
GRI 403: Occupational Health and Safety 2018	403-3 Occupational health services	Occupational Health and Safety (OHS), page 61			
	403-5 Worker training on occupational health and safety	GRI Content Index: A total of 1,656 hours of health and safety training was provided to 207 employees.			
	403-9 Work-related injuries	Occupational Health and Safety (OHS), page 61			
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	Training and Development, page 60-61			
	404-2 Programs for upgrading employee skills and transition assistance programs	Training and Development, page 60-61			
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Employee Profile and Organizational Structure, page 60; Female Representation in Management, page 60; Social Performance Indicators, page 64			
	405-2 Ratio of basic salary and remuneration of women to men	GRI Content Index: No gender-based discrimination is practised in the remuneration processes at KKB, and the principle of equal pay for equal work is upheld. Remuneration policies are determined objectively in accordance with job description, competence, experience and performance criteria.			
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	GRI Content Index: During the reporting period, KKB did not experience any cases of discrimination.			
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	Financial Inclusion, page: 32; Corporate Social Responsibility, page 62			
Operational Sustainability					
GRI 3: Material Topics 2021	3-3 Management of material topics	Identification of Material Issues, page 15-16; Data Center Infrastructure, page 28; Data Center and Operational Resilience, page 57; Operational Continuity and Information Security, page 57			
GRI 308: Supplier Environmental Assessment 2016	308-2 Negative environmental impacts in the supply chain and actions taken	GRI Content Index: During the reporting period, there were no significant negative environmental impacts in KKB's supply chain network. Supplier ESG Evaluation Model (TOPSIS), page 57			
GRI 414: Supplier Social Assessment 2016	414-2 Negative social impacts in the supply chain and actions taken	GRI Content Index: During the reporting period, there were no significant negative social impacts in KKB's supply chain network. Supplier ESG Evaluation Model (TOPSIS), page 57			

KREDİ KAYIT BÜROSU