

Environmental Management Policy

Garanti BBVA International

EMS

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1. Introduction

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

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

In line with these developments, one of the strategic priorities determined by Garanti BBVA International, from now on referred to as GBI, is “Sustainability”.

Within the scope of its sustainability strategy, GBI’s main objectives are;

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

This Environmental Management Policy has been established in the context of defining the roles and responsibilities to determine the environmental impacts in all activities carried out by GBI and its subsidiaries and to take measures against possible negative effects. In the creation of this Policy, the Sustainability Policy dated July 2023, the relevant legal regulations and national / international standards (ISO 14001 Environmental Management System principles.) were taken as reference.

2. Purpose and scope of application

Purpose

2.1 The aim of this Policy is;

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

Scope

2.2

- The Environmental Management Policy of GBI applies to all employees and operations within GBI, encompassing all activities, products, and services offered by the bank. This Policy guides our commitment to sustainable practices, environmental responsibility, and continual improvement across our entire organization.
- The Environmental Management System (EMS) of GarantiBank International N.V. (GBI) is established and maintained in accordance with the requirements of ISO 14001:2015. The scope of the EMS covers all operations and activities conducted at GBI's head office located at Keizersgracht 569-575, 1017 DR Amsterdam, The Netherlands, as well as its branch office in Dusseldorf, Germany.

GBI's core activities include international trade finance, corporate lending, and retail banking. These activities are assessed for their environmental impact, considering both direct and indirect aspects related to the banking sector. The EMS encompasses all processes, services, and functions that contribute to these operations, with a commitment to continuous improvement in environmental performance and compliance with relevant environmental legislation and other requirements applicable to GBI's business activities.

- Additionally, the EMS is integrated into the organizational structure and decision-making processes, ensuring that environmental considerations are part of GBI's strategic direction. The EMS also reflects GBI's obligations and commitments to its parent company, Türkiye Garanti Bankası A.Ş., and its ultimate parent, Banco Bilbao Vizcaya Argentaria S.A. (BBVA), ensuring that the environmental policies and objectives align with those of the broader group.
- This scope statement is subject to regular review and updates to ensure it remains relevant and effective in addressing GBI's environmental responsibilities.

3. General principles

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

- To follow all environmental legal regulations, sustainability programs developed in national / international platforms, to integrate applicable areas, especially ISO 14001 Environmental Management System, into our processes; to fulfill our obligations in legal regulations and programs to which we are a member,
- To be respectful to the environment; to adopt and spread environmental awareness,
- To keep the direct environmental impacts arising from our activities under control, to ensure the effective use of natural resources together with continuous improvements in minimizing the negative effects on the environment,
- To reduce our resource consumption, as well as minimizing waste and e-waste, to lessen any negative impacts our operations may have on the environment.
- To promote a sustainable approach to business by conserving energy, minimizing consumption, preferring low-pollution materials, maximizing efficiency, and implementing the Waste Management Hierarchy as much as possible.
- To integrate sustainability considerations into our business decisions and maintaining an Integrated Management System that incorporates the Environmental Management System in accordance with the requirements of ISO 14001:2015.
- To contribute to the development of our employees by conducting training and internal communication activities to increase their awareness,

- To understand the needs of all stakeholders by encouraging multi-faceted communication and to contribute to their awareness and development,
- To plan our activities with an understanding based on the prevention of environmental pollution,
- To provide the necessary resources by the Management in order to carry out the activities within the scope of the Environmental Management Policy,
- To ensure that the compliance of all activities with this Policy is regularly reviewed by the Environmental Management Team, from now on referred to as EMT.

4. Policy provisions/guidelines

Scope

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

Instructions

- 4.2 Within the scope of this Policy, the following instructions are taken into account when necessary.
- Documents supporting the Environmental Management Policy within the scope of ISO 14001 Environmental Management System (Environmental Handbook and Procedures)

Exceptions

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

5. Governance and monitoring model

- 5.1 This Policy was approved by the Management on 01/07/2023 as a result of the investigations carried out by the Sustainability Officer and was put into effect on 01/07/2023.
- 5.2 This Policy has been prepared by EMT, within their respective areas of responsibility.

Governance Model

- 5.3. The control model within the communication and processes established with internal and external stakeholders is called the “governance model”. The governance model is structured to be traceable at every stage.
- 5.4. Bi-annually internal audits regarding the implementation of the sub-processes within the scope of this Policy are carried out by the EMT, and in case of non-compliances, action is taken to eliminate the non-conformities and/or necessary action is taken by the relevant parties.
- 5.5. For the continuity of national / international certificates, reporting requested by independent audit firms and relevant institutions in line with legal obligations is provided by the EMT.
- 5.6. Internal audit and reporting activities aim to support the environmental management processes structurally, to be reliable, to comply with all regulatory requirements and to document them adequately.
- 5.7. Communication with GBI is carried out by the EMT within the framework of Environmental Management Policy and related processes.
- 5.8. Ensure that all employees receive structured training on ISO 14001 EMS principles, requirements, and implementation strategies. This includes coordinating with external training providers and/or internal experts, scheduling sessions, preparing training materials, and tracking participation to enhance environmental awareness and compliance across the organization.
- 5.9. At least once a year or when necessary, in line with emerging developments, review activities are carried out by the EMT in the procedures related to this Policy and necessary or desired changes are made. Required or desired changes are made by submitting to the EMT and then to the approval of the Management.
- 5.10. Violation of this Policy may result in revocation / suspension of ISO 14001 Environmental Management System Certification.

Glossary

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

Sustainability Policy:

- Aiming to set forth the vision and general principles ("Policy") of GBI's sustainability approach at the Bank,
- Defines and determines the general principles and basic management and control objectives and principles to be followed by the Bank in sustainable development,
- It is the Policy that will serve as a frame of reference while establishing and developing local or sectoral corporate governance policies and systems that will be consistent and harmonious within the bank.

Change Log

Date	Description of the change	Author
01/07/2023	First writing and publishing	EMT
20/08/2024	Annual Policy Review	EMT
04/02/2025	MB Approval	EMT