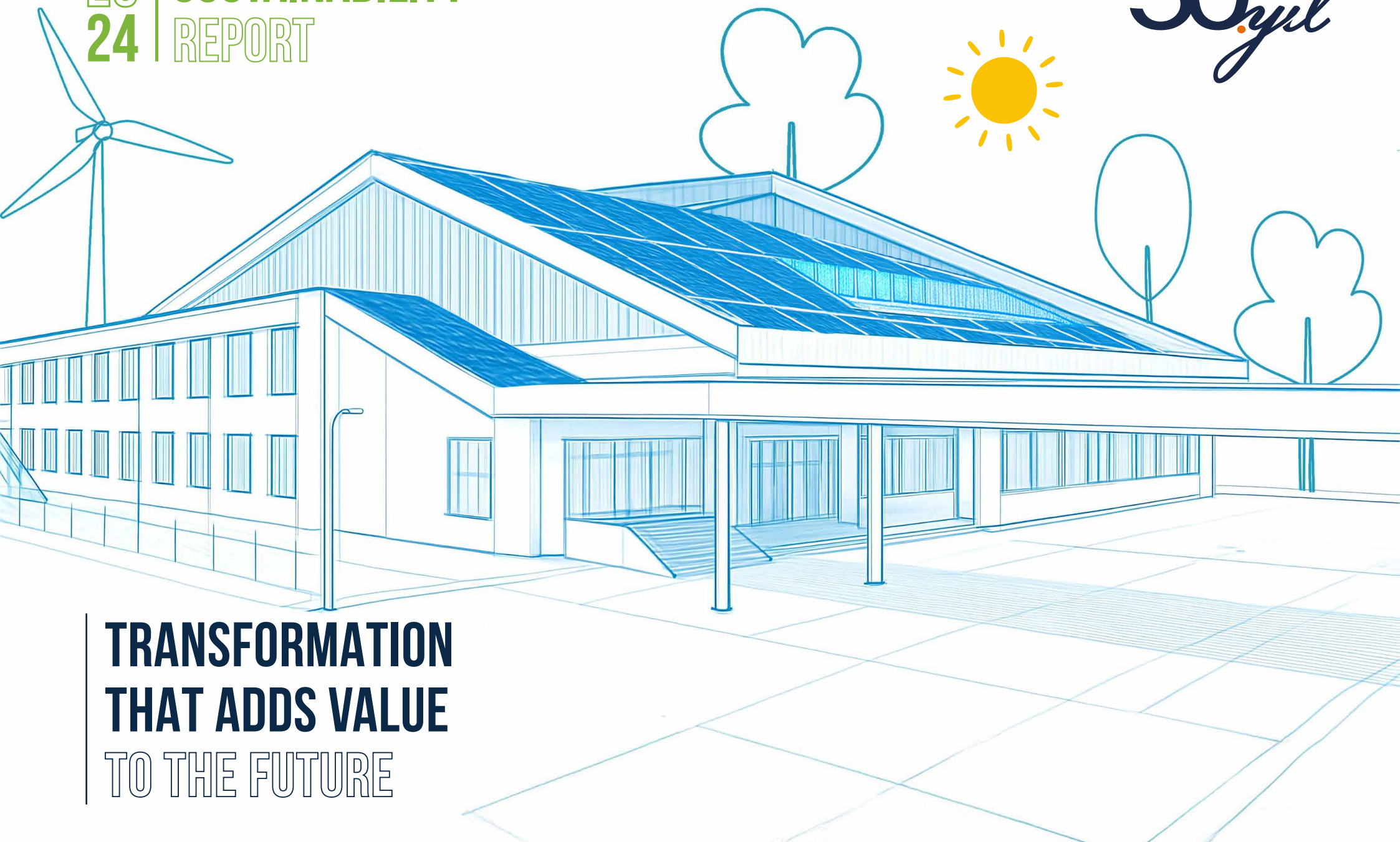


20  
24 | SUSTAINABILITY  
REPORT

30<sup>KB</sup>  
jaar



**TRANSFORMATION  
THAT ADDS VALUE  
TO THE FUTURE**



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### CONTACT

For Kredi Kayıt Bürosu, 2024 was not only a year of preparation but also a period of strategic transformation where sustainability converged with data. As the backbone of the financial system, KKB has fostered a climate of trust in the industry for 30 years, while placing sustainability principles at the core of its corporate culture and technology infrastructure. KKB is building a financial future that encompasses not only data-driven trust but also environmental responsibility.

# 10 YEARS OF PRIDE:

**FINDEKS** 10.yıl

# FINDEKS

Launched with the aim of promoting financial literacy and enabling individuals to manage their own financial wellbeing, Findeks has reached 8 million users and produced over 150 million reports in 10 years. These figures reflect not only the growth of a service, but also the evolution of a journey built on trust, transparency, and financial awareness. Representing KKB's innovative strength in financial services, Findeks continues to serve as a guiding compass in the lives of its users.

2024

A Circle of Trust Embracing the World!

# 8M

10<sup>th</sup> year.  
In the 10<sup>th</sup> year of trust,  
we reached 8 million users.



# 150M

93% individual, 7% commercial  
78% male, 22% female  
we produced reports.





# THE HEART OF FINANCE BEATS HERE

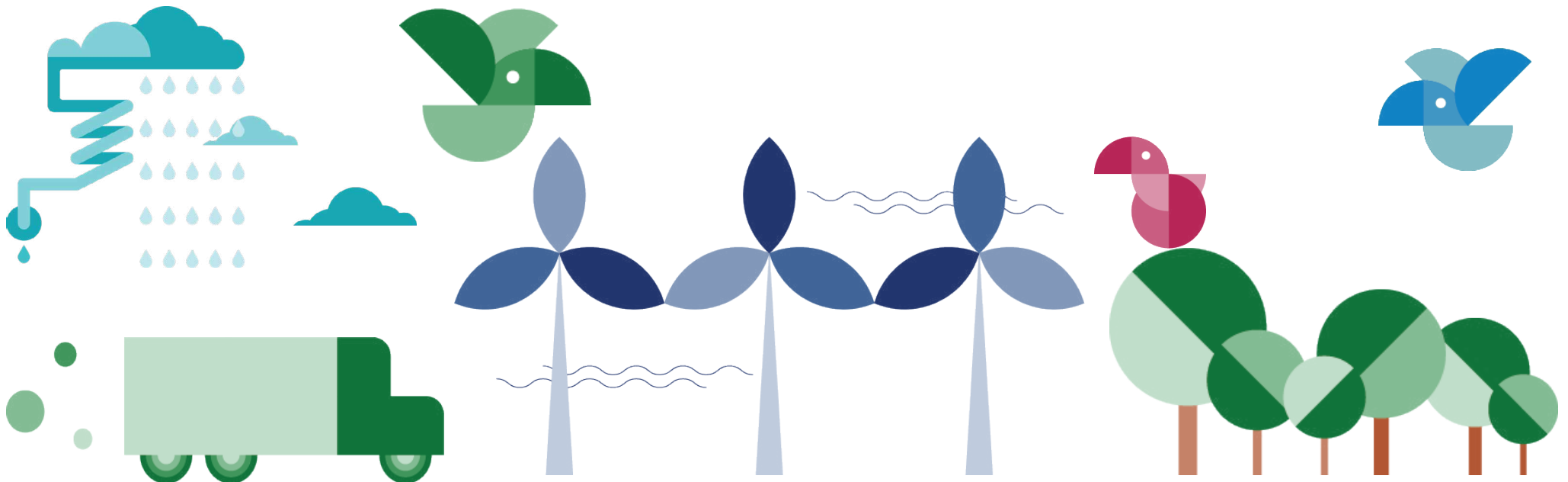
The KKB Anadolu Data Center is an infrastructure solution forming the digital backbone of Türkiye's financial sector. Providing secure, uninterrupted, and efficient service since 2016, the center began expanding its capacity in 2024 to meet growing data processing and storage demands. With the Phase 2 investment of the KKB Anadolu Data Center in Ankara, the installed power capacity will be increased to 40 MVA with 2N redundancy, and the number of cabinets will rise from 1,000 to 3,000. This strategic investment will ensure that all financial data in Türkiye is safeguarded within a highly secure and local ecosystem, strengthening the Credit Bureau's goal of becoming the trusted and sustainable hub of Türkiye's data.



# GREENDEKS

## THE FUTURE WILL BE SHAPED TOGETHER

In 2024, KKB launched a new era by integrating sustainability data into financial decision-making processes. With Greendeks, businesses can make their ESG performance visible, while banks have taken the first steps to incorporate this information into their own operations. Through sector-specific question sets designed for more than 30 industries and over 1,000 actionable recommendations, businesses are able to achieve tangible progress in sustainability. With this data-driven platform, KKB provides the trusted infrastructure for sustainable finance.





## ABOUT THE REPORT

# CREATING VALUE THROUGH STRONG ESG PERFORMANCE

As of 2024, Kredi Kayıt Bürosu (KKB) has published its fifth sustainability report. First released in 2020, the report has been shared with the public regularly in subsequent years.

The 2024 Sustainability Report aims to transparently present KKB's environmental, social, and governance (ESG) performance, its sustainability strategy, and the value it provides to its stakeholders. The report details efforts in sustainable finance, digital transformation, data security, and social contribution, highlighting the contributions made to the sustainability of the national economy through products and services offered to the financial and real sectors. It also explains the scope of efforts to combat climate change, promote social development, and create economic benefits.

The report covers KKB's operational areas, including its products and services, data management, customer relationship management, digital solutions, human resources practices, and environmental impacts. In addition, it provides information on the services carried out on behalf of the Banks Association of Türkiye (TBB) Risk Center, as well as on products such as the Findeks platform and the Agricultural Credit Evaluation System (TARDES).

The material topics covered in this report include sustainable finance, digital transformation, data security, reduction of environmental impacts, social contribution, and human resources management. These topics were shaped by considering KKB's materiality matrix, stakeholder analyses, and activity reports. During the reporting process,

the views of internal and external stakeholders—such as shareholders, members, customers, employees, suppliers, public institutions, universities, and the community—were taken into account, and feedback obtained through surveys was evaluated.

The report covers the period from January 1 to December 31, 2024. KKB's data sharing activities with its member banks and financial institutions, as well as its affiliates and business partners, are also addressed within the scope of the report.

For feedback regarding the report, you can reach us via the contact form on our corporate website or by emailing [info@kkb.com.tr](mailto:info@kkb.com.tr).

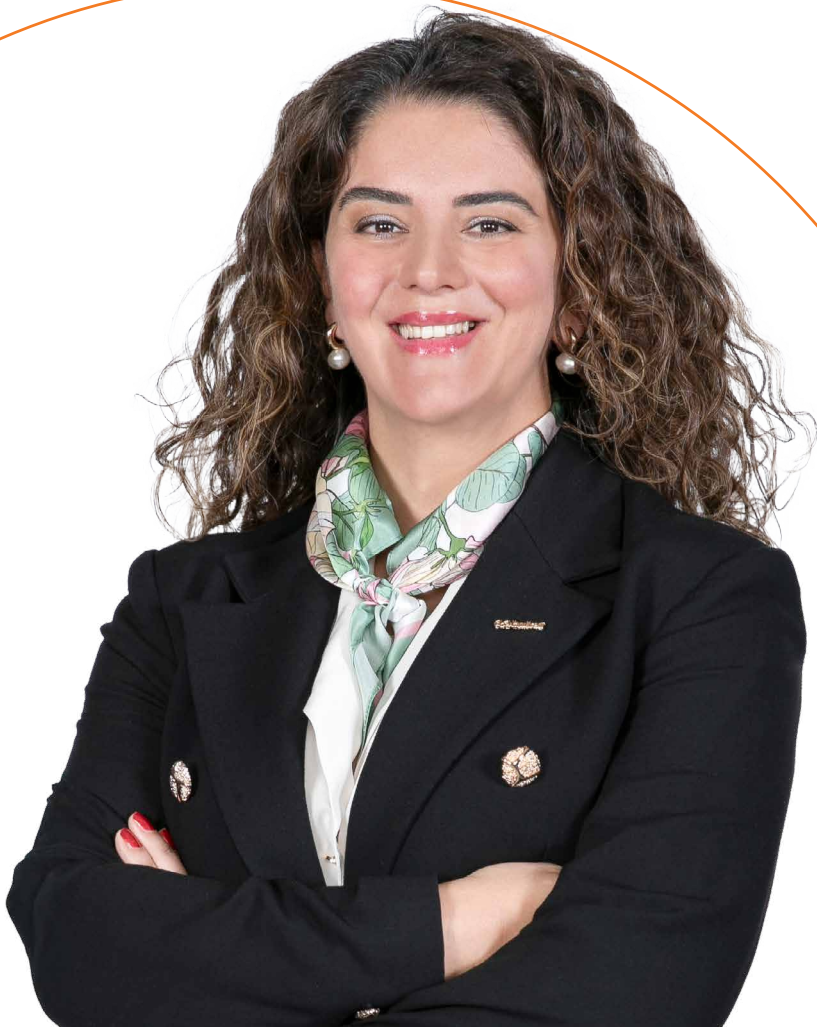






## MESSAGE FROM THE CHAIRPERSON

# BUILDING THE FUTURE WITH TRUST, TRANSPARENCY, AND SUSTAINABILITY



Dear Stakeholders,

The year 2024 was marked by accelerating economic, environmental, and social transformations; a period when resilience, collaboration, risk-based thinking, and sustainability became more vital than ever. In this dynamic environment, institutions carry an increasing responsibility not only to manage the present but also to actively shape the future.

At Kredi Kayıt Bürosu (KKB), we act with full awareness of this responsibility, continuing to contribute to our country's sustainable development goals through our reliable infrastructure, strong technological capabilities, and transparent business models.

With our solutions designed to promote risk management, financial stability, and transparent commerce, we strengthen trust among sector stakeholders and work to reach every segment of society through strategies centered on digitalization and innovation.

The sustainability approach adopted by our institution extends beyond environmental considerations to include social and governance dimensions as well. In this context, we regard our initiatives to reduce environmental impact, our voluntary social responsibility projects, and our commitment to ethical governance as the most tangible reflections of our long-term value creation goal. At KKB, we will continue to use our resources efficiently, develop solutions that are sensitive to society and the environment, and operate with a transparent management approach.

## THE SUSTAINABILITY APPROACH ADOPTED BY OUR INSTITUTION EXTENDS BEYOND ENVIRONMENTAL CONSIDERATIONS TO INCLUDE SOCIAL AND GOVERNANCE DIMENSIONS AS WELL.

In this spirit, and through our strong collaborations, we remain steadfast in our efforts to build a more inclusive and resilient financial system, looking to the future with confidence.

I would like to extend my gratitude to all my colleagues who have contributed to KKB's journey, as well as to our members, stakeholders, and business partners whose continued support strengthens us.

Sincerely,

**Nursezil Küçük Koçak\***  
Kredi Kayıt Bürosu  
Chairperson of the Board

\* As of 2025, the period during which this report was prepared, Ms. Nursezil Küçük Koçak serves as the Chairperson of the Board of Kredi Kayıt Bürosu.



## MESSAGE FROM THE GENERAL MANAGER

# WE HAVE PLACED SUSTAINABILITY AT THE HEART OF OUR PRODUCTS AND SERVICES

Dear Stakeholders,

The year 2024 marked a period in which the rapid pace of global technological transformation coincided with intensified efforts to combat climate change. As digitalization accelerated, artificial intelligence-based systems became more widespread, and environmental factors increasingly influenced economic decision-making, the areas of responsibility for institutions expanded and deepened significantly.

As Kredi Kayıt Bürosu (KKB), we embraced a sustainable and innovative approach during this period—one that addresses not only today's needs but also those of the future. Guided by this vision, we developed new digital platforms and analytical solutions to meet the evolving needs of the financial ecosystem, support trust-based commerce in the real sector, and promote transparent information sharing. By continuously upgrading our technological infrastructure, we further enhanced our capacity to provide fast, secure, and uninterrupted services to our stakeholders.

While integrating the opportunities offered by artificial intelligence technologies into our business models, we placed sustainability principles at the heart of our products and services. Guided by transparency, trust, and innovation, we continued to develop inclusive solutions that consider not only financial performance but also environmental and social impact. In line with this vision, we launched Greendeks to facilitate businesses' access to green finance and initiated efforts to expand its adoption across Türkiye, contributing to the nation's sustainability transformation.

This year, we also organized various panels, training programs, and collaborations to enhance sectoral knowledge sharing in the field of sustainability. In addition, through sustainability-focused finance projects initiated in cooperation with public institutions and our members, we aim to foster greater awareness and transformation across the entire sector.

## WE ORGANIZED VARIOUS PANELS, TRAINING PROGRAMS, AND COLLABORATIONS TO ENHANCE SECTORAL KNOWLEDGE SHARING IN THE FIELD OF SUSTAINABILITY.

We continue to expand our scope of responsibility in environmental sustainability every year. Through our energy efficiency investments and projects promoting the use of renewable energy, we actively manage and reduce our environmental impact. As part of our Environmental Impact Assessment efforts, in 2024 we began calculating our carbon and water footprint across all facilities, broken down by Scope 1, 2, and 3 categories. With this method, we focus on emissions directly resulting from KKB's operations and continue to implement improvement plans aimed at reducing both our institution's and our stakeholders' carbon and water footprints.

As part of our corporate social responsibility strategy, in 2024 we continued to work with even greater dedication to reach all segments of society through the KKB Volunteers Platform, developing projects for children, youth, women, individuals living in disaster-affected regions, and disadvantaged groups.

I would like to express my sincere gratitude to all my colleagues who contributed to these achievements, to our members and business partners who support our vision, and to our Board of Directors for their guidance.

Sincerely,

**Gökhan ŞAHİN**  
Kredi Kayıt Bürosu  
Board Member and General Manager







## KKB IN FIGURES, 2024



### THE CENTER OF THE FINANCIAL SYSTEM

For 30 years, we have been fostering a climate of trust from our position at the center of the financial system. Through the technology-based solutions we offer to the financial and real sectors, we enable the proper management of risks and lay the foundation for the ecosystem's sustainability through transparent and reliable information sharing.

1.65 BILLION

NUMBER OF CRS  
INQUIRIES IN 2024

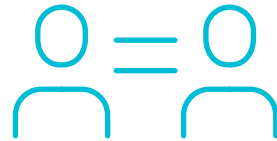


### EFFICIENT DATA CENTER

We manage the KKB Anadolu Data Center, which provides the reliable data infrastructure for Türkiye's financial sector, in line with the highest standards of efficiency and sustainability. Thanks to advanced cooling technologies and energy management systems, we have combined operational excellence with environmental responsibility to achieve a PUE (Power Usage Effectiveness) value that meets global standards.

1.4

ANNUAL AVERAGE PUE  
VALUE



### EQUAL OPPORTUNITY

We support the increased participation of women in business, particularly in the technology sector, and consider diversity and inclusion a fundamental part of our corporate culture. We continue to advance toward the goal of creating an equitable work environment.

38.75%

PROPORTION OF WOMEN  
IN MANAGERIAL  
POSITIONS



### OUR SOCIAL INVESTMENTS

We view creating social benefit as a fundamental part of our corporate responsibility. We encourage our employees' voluntary participation through the "KKB Volunteers Platform" and aim to create a positive impact by reaching different segments of society through 19 different projects we conduct with non-governmental organizations.

282 HOURS

TOTAL VOLUNTEERING  
HOURS IN 2024

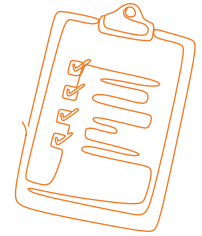


### OUR FOCUS ON EMPLOYEE ENGAGEMENT

We listen to our employees and view their feedback as an opportunity for development. Through this approach, we achieve a tangible and significant increase in employee satisfaction, creating a more motivated and positive work environment. We offer our employees an environment where they can develop their careers and skills and feel a sense of belonging. Our low employee turnover rate is the most significant indicator of the culture of trust and commitment we have created.

+5 POINTS

INCREASE IN EMPLOYEE  
SATISFACTION SURVEY



### EMPLOYER OF CHOICE

With the development opportunities we offer our employees and our positive work culture, we continue to be an employer of choice for Türkiye's most talented professionals. In the Great Place to Work assessment, we were ranked among Türkiye's Best Employers, winning an award in the "Best Large (500-999 Employees)" category.

AWARD IN THE  
"BEST LARGE  
500-999"  
CATEGORY



## ABOUT KKB

# POWERFUL SOLUTIONS FROM RISK MANAGEMENT TO ARTIFICIAL INTELLIGENCE



709

## NUMBER OF EMPLOYEES

Kredi Kayıt Bürosu A.Ş. (KKB) was established on April 11, 1995, as Türkiye's first and only credit bureau, through the partnership of nine banks. As of December 31, 2024, the nine banks continue to be shareholders, and KKB has a total of 197 members. These members include 64 banks, 24 consumer finance companies, 48 factoring companies, 19 financial leasing companies, 10 insurance companies, 24 asset management companies, and organizations from eight different categories. Member institutions have been sharing their customers' credit information through KKB since April 1999.

KKB operates in the financial services and information technology sectors. Its main area of activity is providing credit information, financial analysis data, and risk management solutions for individuals and institutions, as well as developing data-based services. The Company's areas of expertise include credit registration and rating services for banks and financial institutions, individual and commercial reports, cheque reports, credit ratings, and default records, as well as data analytics, fraud detection, ESG data management, and digital platform solutions. Digital risk management tools for individuals and businesses are offered through the Findeks brand, and customized digital solutions are developed for member institutions.

While KKB does not have any directly owned subsidiaries, it engages in systemic and technological collaborations. Collaborations at the regulatory and infrastructural level are

carried out with institutions such as the Banking Regulation and Supervision Agency (BDDK), the Central Bank of the Republic of Türkiye (TCMB), the Banks Association of Türkiye (TBB), the Turkish Capital Markets Association (TSPB), and the Credit Guarantee Fund (KGF). In addition, integration for the sharing of trade registry data is maintained with the Union of Chambers and Commodity Exchanges of Türkiye (TOBB).

As of 2024, KKB employs 709 people. Operating from its Istanbul Varyap Headquarters and R&D Center, as well as its KKB Anadolu Data Center in Ankara, KKB works with all financial institutions and real sector companies nationwide, providing digital services to individuals and organizations in all 81 provinces of Türkiye through the Findeks platform.

As of the end of 2024, KKB has made a total of 95 products and services available to its members. These products include credit reference systems, data

management and analysis services, digital reporting solutions, cheque reports, the QR Coded Cheque System, and the Electronic Letter of Guarantee Platform. The Company continuously expands its product range through technology investments and contributes to the digitalization of the financial ecosystem.

For KKB, 2024 was a year of significant developments in digitalization, sustainability, and international expansion. Throughout the year, the company demonstrated strong performance

in data security, technological infrastructure investments, and stakeholder services. Key developments in this context include the Sustainability Index, preparations for integrating environmental performance data within the framework of the Green Transformation Protocol, a collaboration with TÜBİTAK BİLGEM focused on artificial intelligence and cybersecurity, membership in the Association of Credit Information Providers of Eurasia (ACIPE), and project planning for the capacity expansion of the KKB Anadolu Data Center.

## A SUSTAINABLE FUTURE THROUGH TECHNOLOGY



## SHAREHOLDING STRUCTURE

# RELIABLE FINANCIAL INFRASTRUCTURE THROUGH THE PARTNERSHIP OF NINE BANKS

**9.09%**  
DenizBank A.Ş.

**9.09%**  
T. Vakıflar Bankası T.A.O.

**9.09%**  
T.C. Ziraat Bankası A.Ş.

**9.09%**  
Türkiye İş Bankası A.Ş.

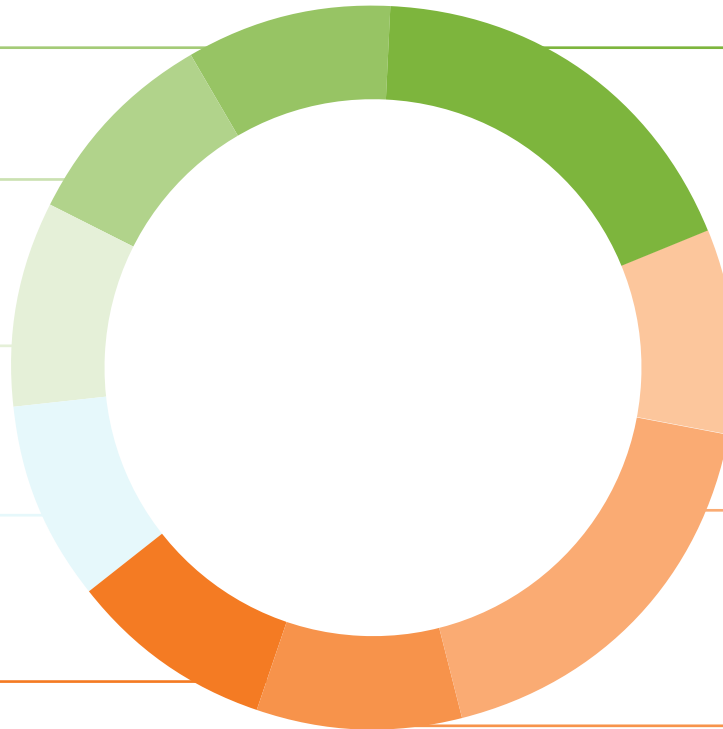
**9.09%**  
Türkiye Garanti Bankası A.Ş.

**18.18%**  
Türkiye Halk Bankası A.Ş.

**9.09%**  
Şekerbank T.A.Ş.

**18.18%**  
Yapı ve Kredi Bankası A.Ş.

**9.09%**  
Akbank T.A.Ş.





## VISION, MISSION, AND STRATEGIES

### VISION

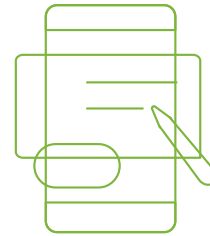
To become an exemplary, leading credit bureau in the world and a growing asset for Türkiye, by exceeding expectations with innovative products and services.

### MISSION

To offer the information and technology that meets the financial needs of the financial industry and the real sector, in the best way, to increase the operational efficiency of the institutions it serves.

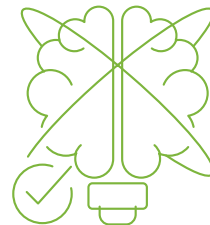
## MAIN STRATEGIES FOR 2024

The main strategies determined by KKB for 2024 were as follows:



### BASIC BUREAU SERVICES

Performing other services as determined by contracts, in particular data collection, storage and sharing, provided to the TBB Risk Center, to the highest standards of security and service, using KKB's competence in information gathering, safe storage, sharing and development of value added products and services in order to meet similar needs in various sectors, enhancing data resources to this end, providing the analysis and reports needed to support stakeholders' credit policies and strategic decisions.



### ANALYTICAL SERVICES

Expanding the application surfaces of big data, artificial intelligence and advanced analytical methods, developing internal competencies in these areas and increasing the number of R&D projects based on analytical models.





## VISION, MISSION, AND STRATEGIES

### 2024 MAIN STRATEGIES

#### MANAGED SERVICES



Providing and operating the services needed by the financial sector by using KKB's technological, analytical and general capabilities, providing operational productivity and cost advantages by centralizing transactions realized by different institutions within KKB, carrying out activities to increase awareness and production efficiency in the real sector by reducing costs of accessing information technologies, supporting domestic R&D activities, developing products with technologies such as artificial intelligence and blockchain, collaborating with companies producing technology within this scope.

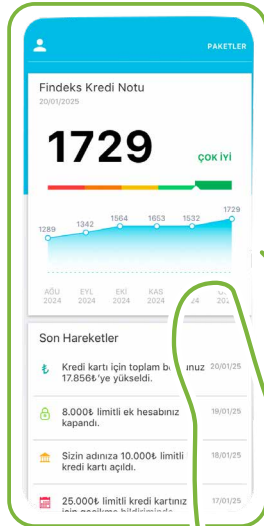


#### DATA CENTER AND CLOUD SERVICES

Providing infrastructure shared data center services to the public and real sectors, primarily the financial sector, providing Cloud-based software and platform services and other related value-added services, providing cloud-based services that fintech and other startups may access easily and benefit from.

#### FINDEKS

Developing the products and services offered through Findeks, KKB's service channel and brand for individuals and non-financial sectors, increasing the awareness of risk management and financial literacy among the target segment, implementation of products beneficial to the real sector in risk management, facilitating access to financial products for the real sector and individuals.



#### CORPORATE SOCIAL RESPONSIBILITY

Providing benefit to society and the environment with innovation-based social responsibility projects which it will develop and support, ensuring increased public awareness on these issues, implementing the basic requirements in terms of environmental awareness and sustainability, and demonstrating positive discrimination in favor of institutions which have proved effective in this regard.



#### CORPORATE GOVERNANCE

KKB's being one of the most popular companies to work with its highly competent staff in its field and as an institution which prioritizes institutionalism by creating a corporate culture that observes justice and encourages unity among its employees, operates its processes in accordance with best practices and provides a high level of employee satisfaction.





## CORPORATE VALUES

# BUILDING TRUST THROUGH TRANSPARENT COMMUNICATION AND RESPONSIBILITY

### KKB AIMS TO CREATE A LONG-TERM IMPACT BY INTEGRATING ITS CORPORATE VALUES INTO ITS SUSTAINABILITY STRATEGY.

The corporate values of Kredi Kayıt Bürosu are built around four pillars: teamwork, reputation, responsibility, and continuous development. Acting in line with common goals through an open and transparent communication approach represents the Company's greatest strength. Assuming the responsibility of providing economic and social benefit, the Company adopts fairness toward its stakeholders and employees, as well as accuracy and completeness in informing its members and

customers, as a fundamental principle. Thanks to its innovation approach and qualified human resources, the continuous development of products, service quality, and technological infrastructure are among its primary goals.

Regular training and development programs are implemented to ensure that corporate values are internalized by employees. Training content is delivered in various categories through comprehensive, time-based plans, encouraging employees to reflect these values in their work processes.

KKB aims to create a long-term impact by integrating its corporate values into its sustainability strategy. Agricultural reporting activities, solar energy investments, and the regularly published annual sustainability reports are among the tangible indicators of this strategic approach.

Corporate values are also reflected in all relationships with customers and business partners. Updates are made to the Findeks and corporate platforms based on customer requests, and products and services are shaped by feedback. Within the framework of ethical business practices, care is taken to ensure transparency and compliance with the PDPL in contracts signed with members and business partners. In the field of information security, a structure compliant with ISO/IEC 27001 and 27701\* standards is maintained.

*\* Work on ISO 27701 began in 2024, and the relevant certification was obtained in 2025 following an independent audit.*





## MILESTONES

SUSTAINABLE GROWTH IS ACHIEVED  
THROUGH SYSTEMATIC INNOVATIONS

1995

- KKB was established on April 11<sup>th</sup>.

1999

- The Credit Reference System (CRS) launched in April.
- With an amendment to the Banking Law on December 17, 1999, in addition to institutions such as banks, insurance providers, and consumer finance companies, other corporate enterprises deemed appropriate by the Banking Regulation and Supervision Agency (BDDK) were allowed to become members of KKB.

2000

- The Customer Objections Handling System (MİDES) launched.
- False Information/Document/Declaration/Application Alert System (SABAS) launched.
- MİDES migrated to an electronic platform, making it possible to reply to a customer's objection within two hours maximum.

2001

- Credit Account Records, as well as Credit Application Records, were opened to sharing.

2002

- The Information Verification System (İVS) went into operation.

2004

- Personal Credit Rating (PCR) was introduced.

2005

- The Corporate Bureau System (CBS) went into operation.

2006

- MİDES, Information Verification, and the Emergency Update System were converted into a fully online, interactive information exchange platform.
- The Limit Control System (LCS) launched pursuant to Article 9 of the Debit Cards and Credit Cards Law.

2007

- The Internet Frauds Alarm System (İFAS) launched.

2008

- With the addition of the data from mortgaged real estate, persons banned from participation in tenders, and bounced cheques to the Corporate Bureau System (CBS), the database was enriched.
- The technical infrastructure of SABAS was improved and integrated with the KKB system.

2009

- The "Bounced Cheque Query System" launched for inquiry of bounced cheque data, which are shared with the members on a daily basis.

2012

- Undergoing a period of rapid transformation, KKB set out to create a system for the real sector, similar to the closed-circuit system between banks.
- Concrete steps were taken to launch the infrastructure of the Risk Center. Risk and Cheque Reports were introduced and the E-Reporting System, enabling electronic report requests and delivery, went into service.
- Personal Indebtedness Index (PII) went into operation.

2013

- E-Reporting System launched.
- Commercial Credit Rating (CCR) was launched.
- Credit Rating and Cheque Index started to be provided together with the Cheque and Risk Reports.
- GeoMIS, the map-based reporting service, was made available to CRS member institutions.
- TARDES and GeoMIS websites went live.
- Following the agreement executed between the Banks Association of Türkiye (TBB) and KKB, works on the Risk Center commenced. The entire infrastructure and operation-related works were undertaken by KKB.

2014

- The Findeks brand was introduced and www.findeks.com was launched. Findeks press launch was held. A 360-degrees communications campaign was initiated.
- The first corporate social responsibility project, "You Imagine, We Realize," organized by KKB for all university students in Türkiye, started.
- Cheque Status Inquiry was launched.
- The Household Database and Trade Registry Sharing System (TRSS) was launched.
- The Loans Analysis Portal went live.
- The Address Processing System was launched.
- Letter of Guarantee Status Inquiry (LGSİ) was launched.
- Central Decision Support System (CDSS) was launched.

2015

- The Findeks QR Code Cheque System was launched in collaboration with the Banks Association of Türkiye (TBB).
- The National Fraud Detection and Prevention Service was launched.
- The Factoring Invoice Pool of the Association of Financial Institutions (FKB) was launched.
- The foundation was laid for the Data Center, which will be built in Ankara.
- The Cross Cheque Inquiry Application was launched.
- IBAN Verification Service was launched.
- The CRS daily sharing system went into service.

2016

- QR Code Cheque was enacted on 9 August 2016, with the announcement in the Official Gazette numbered 29796.
- Cheque Analysis Portal was launched.
- Limit Control System (LCS) Customer Objections Handling System (MİDES) application was put into service.
- KKB Unknown Number Service was launched.
- Collection Scores were introduced.
- Inclination Scores were rolled out.
- The KKB Anadolu Data Center received the LEED Platinum Green Building Certification.

2017

- QR Code Cheque implementation became compulsory as of January 1, 2017.
- KKB's Emergency Center moved to the KKB Anadolu Data Center, which was completed in Ankara.
- The "Audio Question Bank" was launched by KKB employees to provide equal opportunities in education for visually impaired students.
- Force Majeure Inquiry and BKM Member Merchant Turnover Information Inquiry services were launched.
- Individual Inquiry Reports were put into service.
- Loan Utilization Instant Sharing Service (KAPS) was introduced.

2018

- Findeks QR Code Cheque Registration System, was introduced on January 1, 2018.
- The Electronic Letter of Guarantee project was launched.
- The Foreign Currency Credit and Income Inquiry System, which enables the instantaneous monitoring of foreign currency income and risks of companies, was introduced.



## MILESTONES

SECURE FINANCIAL ECOSYSTEM  
WITH DATA-DRIVEN SOLUTIONS

## 2019

- The renewed Findeks Mobile App was made available for users.
- QR Code Cheque System was introduced.
- BDDK Product and Service Fees Portal went live.
- “Retrospective CRS Inquiry” and “Provision of Risk Center Report via E-State Gateway” were introduced on behalf of the TBB Risk Center.
- At the Sardis Awards, the QR Code Cheque System Project won the Golden Sardis, and the Electronic Letter of Guarantee Project won the Silver Sardis.
- The Audio Question Bank Project won the Innovation Award at the TISK Corporate Social Responsibility Awards. The project also won the Gold Award in the Social Responsibility Projects Communication Category at the Istanbul Marketing Awards, and the Grand Prize as a company adding value to sustainable development goals.

## 2020

- KKB R&D Center was established.
- Turkish ID Number - GSM verification service was launched.
- Agricultural Loan Score was put into service.
- KKB Nova platform was put into use.
- KKB won a Silver Sardis Award for its Findeks Mobile Project.
- The “Findeks Renewed Mobile App Communications” campaign received a Bronze Effie Award.
- KKB was awarded the first prize in the “Future of Business - Metrics & KBIs” category at the IDC Türkiye CIO Summit Awards.
- KKB’s Digital Transformation Project was awarded the second prize in the “Digital Trail-blazer” category at the IDC DX Awards 2020.
- In 2020, the KKB Anadolu Data Center completed ISO 14001 certification.
- The first Sustainability Report was published.

## 2021

- Findeks reached 5 million users.
- KKB Anadolu Data Center rounded off its 5<sup>th</sup> year.
- Personal Credit Rating (PCR) G6 Score Integration was accomplished.
- The Commercial Indebtedness Index was launched.
- The in-house entrepreneurship platform “Dynamo” was launched.
- KKB Sustainability Report was published.
- The query-based “Fraud Detection Analysis Model” working with Artificial Intelligence was activated.
- KKB’s carbon and water footprint calculations have begun to be conducted using the life cycle assessment method, utilizing the CCalC software and the CML2001 method, with data from the Ecoinvent database.

## 2022

- Credit Literacy Week social awareness project was launched.
- In line with its sustainability approach, KKB completed the installation project of a solar power plant at the KKB Anadolu Data Center to utilize renewable energy.
- National cloud technologies in accordance with finance sector regulations project was launched.
- Product use was increased by 70% compared to the previous year by reaching 1 billion inquiries in CRS.
- The highest monthly number of inquiries in the year was reached in September 2022 with 14.6 million inquiries in CBS. Throughout 2022, the highest level of inquiries compared to previous years was reached with 136 million inquiries.
- ISO 14001 certification has been achieved at all locations where KKB operates, including the KKB Headquarters, KKB R&D Center, and KKB Anadolu Data Center.
- Renewable energy production began at the KKB Anadolu Data Center with the solar power plant, and a rainwater storage system was put into operation at the Istanbul Headquarters building.

## 2023

- Within the scope of the cooperation between Findeks and Small and Medium Enterprises Development Organization (KOSGEB), the Enterprise Assessment Report (EAR) was made available to Findeks users.
- The system that enables instant sharing of all loan information provided under the Electronic Investment Incentive Certificate (e-YTB) was put into practice. e-YTB aims to prevent duplicate credit disbursements and conduct limit control in a healthy manner.
- The development work for the second-generation model of the Individual Credit Score, which was developed for the Azerbaijan Credit Bureau in 2020, has also been successfully completed, contributing to the ability of the country’s financial sector to make more objective, fast, and accurate credit decisions.
- “Great Place to Work” certification has been earned by fulfilling the criteria for being a “Great Workplace.”
- The lighting fixtures at the Istanbul Varyap Headquarters building were replaced with LEDs, resulting in energy savings.

## 2024

- Greendeks product pilot studies were completed.
- The KKB Main Data Center, previously located at the Istanbul Headquarters building, was relocated to KKB’s Anadolu Data Center in Ankara.
- Simplification efforts were initiated in product and organizational areas.
- Agile Transformation works have been initiated.
- The KKB Anadolu Data Center reached 100% capacity, and planning for the construction of the second phase of the data center has begun.
- The establishment of KKB Finance Cloud was completed.
- KKB was recognized on the Great Place to Work ‘Türkiye’s Best Employers 2024’ list.
- KKB was included in the Great Place to Work ‘Best Large 500-999 Employees’ category list, earning the right to receive an award.
- A cooperation protocol was signed between BILGEM and KKB with the aim of delivering technological solutions developed by TÜBİTAK to the financial and real sectors.
- A strategic initiative was launched to establish a central position in artificial intelligence and provide solutions to the industry.





## AWARDS

# OUR JOURNEY OF SUCCESS IS STRENGTHENED BY AWARDS

2014

**GeoMIS Map-Based Reporting System**  
"Oracle 2014 Innovator Excellence" Award

2018

**Kredi Kayıt Bürosu Information Security Team**

The "Security Team of the Year" award in the EMEA region by the global cybersecurity company FireEye

**Electronic Letter of Guarantee Project**  
IDC Türkiye Finance Summit

The first prize in "Corporate Banking" category at the "Best Financial Technology Projects of the Year" awards

**Digital Transformation of Software Quality in the Data Infrastructure Category**

IDC Türkiye Finance Summit  
The second prize at the "Best Financial Technology Projects of the Year" Awards

**Audio Question Bank Project**

Association of Private Sector Volunteers  
The "Most Successful Volunteering Project" Award

Prizes at the Felis Awards, organized by MediaCat, in the categories of "Education" and "Voluntary Work for Disabled People" under the main heading of Social Responsibility and Sustainability

2019

**QR Code Cheque System Project**

The Golden Sardis Award in the "Product and Service Innovation" category at the Sardis Awards

**Electronic Letter of Guarantee Project**

The Silver Sardis Award in the "Product and Service Innovation" category at the Sardis Awards

**Audio Question Bank Project**

The Innovation Award at the Corporate Social Responsibility Awards organized by the Türkiye Confederation of Employers' Associations (TISK)

The Grand Prize in the "Organizations Adding Value to Sustainable Development Goals" category at the Corporate Social Responsibility Summit

The Gold Award in the "Social Responsibility Project Communications" category at the Istanbul Marketing Awards

2020

**Findeks Mobile Project**

The Silver Sardis Award in the "Product and Service Innovation" category at the Sardis Awards

**"Findeks Renewed Mobile App Communications" Campaign**

The bronze award in the "Banks and Financial Institutions" category at the Effie 2020 Awards

**Corporate Performance Management Application**

The first prize in the "Future of Business - Metrics & KBIs" category at the IDC Türkiye CIO Summit Awards

**Digital Transformation Project**

The second prize in the "Digital Trailblazer" category at the IDC DX Awards 2020

2021

**Turkish ID Number-GSM Verification Service**

The second prize in the category of "Corporate Banking" at IDC Türkiye Finance Technology Awards

**Mobile Application Test Automation Infrastructure Project**

The second prize in the "Future of Digital Infrastructure" category of IDC Türkiye Digital Transformation Awards

**Third Party Risk Management Program**

The third prize in the category of "Security and Fraud Management" at IDC Türkiye Finance Technology Awards

**UCMDB Content Enrichment Project**

The second prize at IDC Türkiye Finance Technology Awards

**Smart CRM Project**

The "Wtech Marketing Award" given by the Women in Technology Association to the women leaders, who use technology best in marketing, as part of the Marketing Captains Awards

KKB TARDES Service

Türkiye's most innovative 50 companies list determined by Fast Company magazine

2022

**Strategic Performance Management Platform and Methodology (OKR) Project**

IDC Türkiye CIO Summit 2022  
The second prize in "Metrics and Key Business Indicators" in Future of Business Awards

**Robotic Process Request Management Methodology Project**

The third prize in "Automation" category in IDC Türkiye CIO Summit 2022 Future of Business Awards

2023

**Findeks and KOSGEB EAR Integration Cooperation Project**

First prize in the "Effective Competitiveness" category at PSM Awards

2024

**TEGEP Education and Development Platform Association Learning and Development Awards**

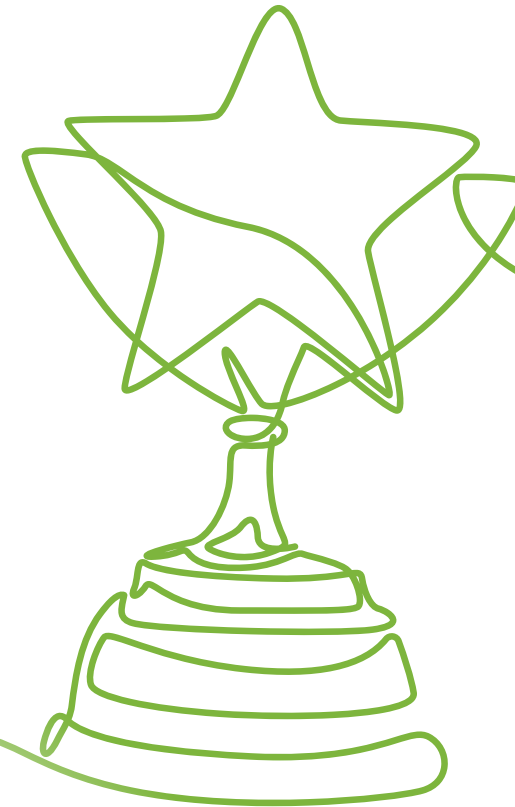
"Best Internal Trainer Development Program" Award

**IDC Türkiye, Test Automation Project with Artificial Intelligence**

"IT Cost Efficiency Project of the Year" Award

**Great Place to Work**

Türkiye's Best Employers Award Best Large 500-999 Category





## KEY DEVELOPMENTS IN 2024

# PIONEERING STEPS ENABLED BY SUSTAINABILITY AND DIGITAL TRANSFORMATION

For Kredi Kayıt Bürosu, 2024 was a period in which strategic investments were made in sustainability, digital transformation, and efficiency; innovative products and services were developed; and significant awards were won. The Company transformed its business processes by considering both financial and environmental impacts, strengthened its technological infrastructure through data centers and digital solutions, and accelerated its efforts to create value for its stakeholders.

During the year, the “Simplification and Efficiency” project emerged as a strategic priority. The efforts focused on optimizing processes, products, technologies, and the organizational structure, with comprehensive arrangements made to enable employees to work in a more purpose-driven and effective manner. During this period, the Greendeks pilot studies were successfully completed, and preliminary negotiations were held for the “Protocol on Green Transformation in Industry” signed with the Ministry of Environment, Urbanization, and Climate Change in 2025. Findeks was positioned among strategic priorities with services developed to help users track their financial status more easily, and the Digital Document Center, aimed at migrating the documents of banks’ commercial customers to a digital platform, was another important project launched in 2024.

One of the year’s largest investments was made at the KKB Anadolu Data Center. With the facility operating at full capacity, planning has commenced for the construction of its second phase. This investment aimed to strengthen the Company’s infrastructure to meet its growing needs.

Noteworthy applications were also implemented in the fields of innovation, digitalization, and energy technologies. Within the scope of the Prod Migration Project, the production environment was relocated from Istanbul to the TIER IV-compliant KKB Anadolu Data Center, thereby increasing security, efficiency, and business continuity. During the same period, operational processes were restructured through simplification and efficiency projects.

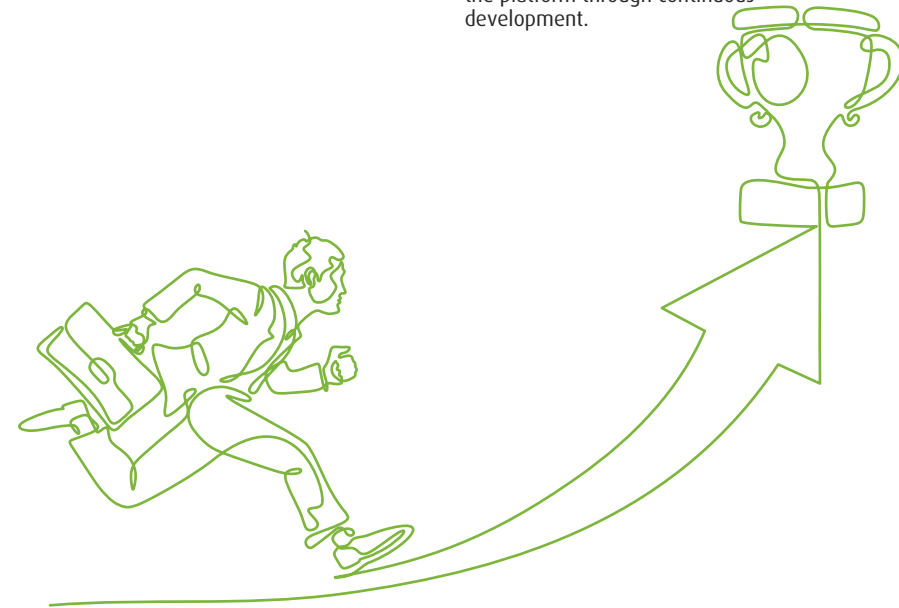
In the area of sustainability and environmental impact reduction, various applications stood out alongside Greendeks. Initiatives such as the e-letter of guarantee, the digital document center, the solar power system, rainwater harvesting at the data center, and the use of water purification devices have contributed to reducing environmental impact. In terms of social contribution, the products developed have created value by guiding businesses on their sustainability journeys.

The year 2024 was also a year in which KKB was crowned with various achievements and awards. The “Best In-House Trainer Development Program” award was won at the Learning and Development Awards organized by the TEGEP Training and Development Platform Association. The AI-Powered Test Automation Project was awarded by IDC Türkiye in the “Best IT Cost Efficiency Project of the Year” category. Additionally, the Company was ranked among Türkiye’s Best Employers in the Great Place to Work assessment, winning an award in the “Best Large 500-999” category.

One of the most notable innovations of 2024 was the Greendeks product, which is at the heart of the Company’s sustainability strategy. This platform, which evaluates the Environmental, Social, and Governance (ESG) performance of businesses, provides analyses with industry-specific question sets, and guides businesses with over 1,000 action recommendations, offers a comprehensive solution that facilitates access to green finance and supports the transition to sustainable business models.

With the upcoming launch of Greendeks, companies in Türkiye will have the opportunity to assess their sustainability performance more transparently. Thanks to the carbon footprint calculation module, they will be able to measure their environmental impact and plan their strategic steps more consciously.

With the excitement of its 30<sup>th</sup> anniversary, KKB aims to accelerate its investments focused on sustainability, digital transformation, and data analytics. In the coming period, plans include expanding the scope of Greendeks to reach more businesses, increasing national and international collaborations, and strengthening the platform through continuous development.





## SUSTAINABILITY GOVERNANCE AND ORGANIZATION

# A SUSTAINABLE STRUCTURE THROUGH PROACTIVE MANAGEMENT

Kredi Kayıt Bürosu (KKB) considers climate-related risks and opportunities an integral part of its corporate strategy and decision-making mechanisms. Instead of managing these elements reactively, the Company uses them as a tool to enhance the resilience of its business model, create new market opportunities, and respond to stakeholder expectations at the highest level.

### Sustainability Governance Structure at KKB

The ultimate responsibility and highest level of oversight for sustainability and climate-related issues belong to the Board of Directors. The Board of Directors effectively fulfills this oversight duty through its committees, which are integrated into KKB's corporate governance structure and report directly to it, and through Senior Management.

At the center of this governance structure is the Sustainability Committee, which operates with high-level participation. The Committee is chaired by the General Manager;

in meetings where the General Manager is unable to attend, the role of chairperson is carried out by the Assistant General Manager of Risk Management (Vice Chairperson). The Committee, which includes senior representatives from various departments such as Financial Reporting and Financial Affairs, Information Technologies, Human Resources, and Corporate Strategy, ensures that sustainability issues are addressed with a holistic approach throughout the company.

In addition to the Sustainability Committee, the Audit Committee also oversees the effective integration of climate-related risks into the Company's overall control framework through the audit of risk management processes. Corporate Risk Management supports these processes by providing input for strategic direction.

The responsibility for implementing the strategies and policies approved by the Board of Directors, monitoring performance, and achieving targets is carried out by Senior Management, led by the General Manager, who also chairs the Sustainability Committee.

### Sustainability Committee Members: Chairperson:

- General Manager (Chairperson)
- Risk Management Department Assistant General Manager (AGM) (Vice Chairperson)

### Members:

- Corporate Strategy Management AGM
- Digital Channels, Innovation, and Project Management AGM
- Financial Reporting and Financial Affairs AGM
- Information Technologies and R&D AGM
- Risk Center Services and Data Management AGM
- Risk Management Department AGM
- Human Resources and Corporate Communications AGM
- Head of Internal Control
- Product Development and Management AGM
- Sales and Operations Management AGM
- KKB Digital Services AGM
- Corporate Risk Manager
- Marketing Manager

### Industry Leadership and Stakeholder Engagement

Throughout 2024, Kredi Kayıt Bürosu also took an active role in national and international platforms in the field of sustainability.

- Participated as a Diamond Sponsor in **DigitalTalks Sustainability Conversations 2024**, where KKB's Greendeks product was introduced in a session titled "Sustainability in Business Today and in the Future: Moving Forward with Greendeks."
- Became a finalist in the "Sustainability Communication-Internal Communication" category at the **2024 Sustainable Business Awards**, organized by the Sustainability Academy.
- Provided Silver Sponsorship for **Çevrefest 2024** and participated as a speaker in the "Green Finance" panel.

- Participated as a Diamond Sponsor at the **Carbon Summit 2024** and represented the Company in the "Financial Opportunities for Green Transformation" session.
- At the "**Business Assessment Report and KOSGEB Green Industry Support Program**" seminar hosted by the Istanbul Chamber of Commerce, KKB and KOSGEB officials presented the Business Assessment Report via Findeks and introduced the related support program.
- The "**Türkiye Agricultural Outlook Field Research Report**," published annually since 2019, was also published and shared with the public in 2024.





## SUSTAINABILITY APPROACH AND STRATEGY

# A HOLISTIC STRATEGIC APPROACH TO SUSTAINABILITY

Kredi Kayıt Bürosu (KKB) defines sustainability not only as the management of environmental impacts but also as a holistic approach that supports the reliability, inclusiveness, and long-term resilience of the financial system. Within this framework, sustainability is addressed through three dimensions:

- **Environmental dimension:** Efficient use of natural resources, reduction of carbon footprint, energy management, and green data center infrastructure.
- **Social dimension:** Data security, inclusive finance practices, employee satisfaction, and equitable human resources policies.
- **Governance dimension:** Transparent reporting, ethical data management, stakeholder engagement, and regulatory compliance.

This approach demonstrates that, for KKB, sustainability is not just an environmental policy but also a responsibility to provide responsible data services and contribute to the financial well-being of society.

Sustainability is positioned as a strategic priority in the corporate culture. The impact of sustainability is considered across all product development, stakeholder relations, and operational processes. In this context, the Environmental Management System, compliant with the ISO 14001 standard, is regularly updated, sustainability risks in new projects are analyzed, and awareness training is provided to employees. Additionally, with the Greendeks product, whose development began in 2024, institutions were enabled to report their current status in line with ESG criteria, identify areas for improvement, and support their access to green finance.

KKB's sustainability strategy is monitored using the Objectives and Key Results (OKR) methodology; strategic goals are reviewed at annual meetings, and performance indicators are tracked via digital KPI dashboards. Environmental targets are set using the ISO 14001 Environmental Management System framework, the results are shared at Management Review meetings, and they are evaluated by the sustainability committee.

The strategy is based on the principles of "focusing on material topics," "managing value chain impacts," "integration with governance," and "target-performance orientation." Within this framework:

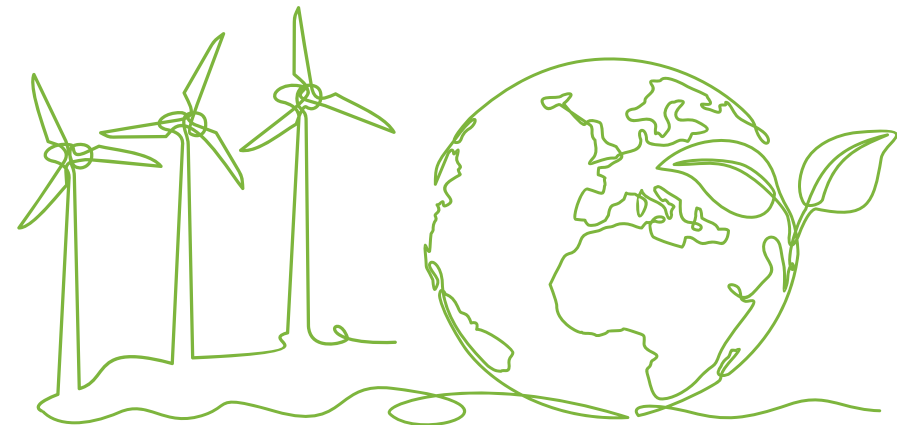
1. Climate risks and opportunities are regularly analyzed and integrated into risk management processes.
2. The environmental policy aims for resource efficiency, reduction of carbon emissions, use of renewable energy, and contribution to the circular economy.
3. Management systems are supported by ISO 14001, ISO/IEC 27001, ISO/IEC 27701\*, ISO 27017\*\*, and ISO 22301 standards; in addition to these certifications, the KKB Anadolu Data Center also holds a LEED Platinum certification.
4. Energy and emission management, supported by I-REC\*\*\* certificates, aims to increase the use of renewable energy.
5. Data-driven impact management aims to contribute to customers' ESG compliance through products like Greendeks.

Significant steps were taken in 2024 as part of the sustainability roadmap. Automation and simplification projects were implemented, disaster recovery management systems were strengthened, pilot studies for Greendeks were initiated, and planning for new data center investments was carried out.

The future sustainability strategy includes increasing participation in national initiatives such as the Green Industry Protocol, expanding renewable energy investments, increasing solar power capacity through new solar

energy projects, broadening the scope of the Greendeks product, and diversifying awareness training for employees.

With this holistic approach, KKB has made it a strategic priority to both reduce its own environmental impacts and contribute to the sustainable transformation of the financial ecosystem.



\* The ISO/IEC 27701 certificate was awarded to our Company in 2025.

\*\* The ISO 27017 certificate was awarded to our Company in 2025.

\*\*\* Implemented as of 2025.





## STAKEHOLDER MAP AND STAKEHOLDER RELATIONS

# WE ENSURE TRANSPARENT AND CONTINUOUS COMMUNICATION WITH OUR STAKEHOLDERS

### Stakeholders

### Communication Channels

<b>Shareholders</b>	General assembly meetings, financial reports, official correspondence
<b>KKB Management</b>	Board of Directors meetings, executive committee and other committee meetings
<b>Employees</b>	Internal communication platforms, surveys, intranet, meetings
<b>Members</b>	Digital platforms, meetings, e-newsletters
<b>Customers</b>	Data center newsletters, customer support channels
<b>Society</b>	Social responsibility projects, volunteering activities, sustainability reports
<b>Suppliers</b>	Supplier risk assessment, procurement processes, disaster recovery tests
<b>Public and Regulatory Institutions</b>	Regular reporting, official correspondence, meetings
<b>National and International Banks and Financial Institutions</b>	Financial reporting, collaboration meetings
<b>Industry Associations and Organizations</b>	Workshops, industry meetings, membership activities
<b>NGOs, Memberships, and Associations</b>	Joint projects, membership events
<b>Academia and Universities</b>	Consulting services, surveys, social responsibility projects, research collaborations
<b>Media</b>	Press releases, interviews, social media, press conferences





## MATERIAL TOPICS AND MATERIALITY MATRIX

# WE SHAPE OUR PRIORITIES THROUGH OUR STAKEHOLDERS' EXPECTATIONS

**WE INTEGRATE  
OUR LOCAL AND  
SECTORAL PRIORITIES  
WITH GLOBAL  
SUSTAINABILITY  
GOALS.**

At KKB, we regularly update our material topics, which form the basis of our sustainability strategy, in line with our stakeholders' expectations, our industry's dynamics, and our corporate strategy. This approach supports the long-term success of our operations, contributes to the effective management of risks and opportunities, and allows us to create shared value for all our stakeholders.

### Process for Determining Material Topics

In the first stage of the study, **18 material topics** deemed important for our Company were identified, and a stakeholder survey was prepared based on these topics. The survey was distributed to **13 stakeholder groups**, covering both KKB's internal and external stakeholders, and responses were received from a total of **64 stakeholders**. The stakeholder groups that responded were:

- Members
- Customers
- Industry Associations and Organizations
- Suppliers
- Academia and Universities
- Non-Governmental Organizations (NGOs), Memberships, and Associations

During this process, feedback gathered from stakeholders were analyzed in light of global and sectoral developments, as well as strategic assessments by our management. As a result, the scope of existing topics was updated, restructured according to needs, and a materiality approach specific to our Company was established.

### Materiality Analysis and Matrix

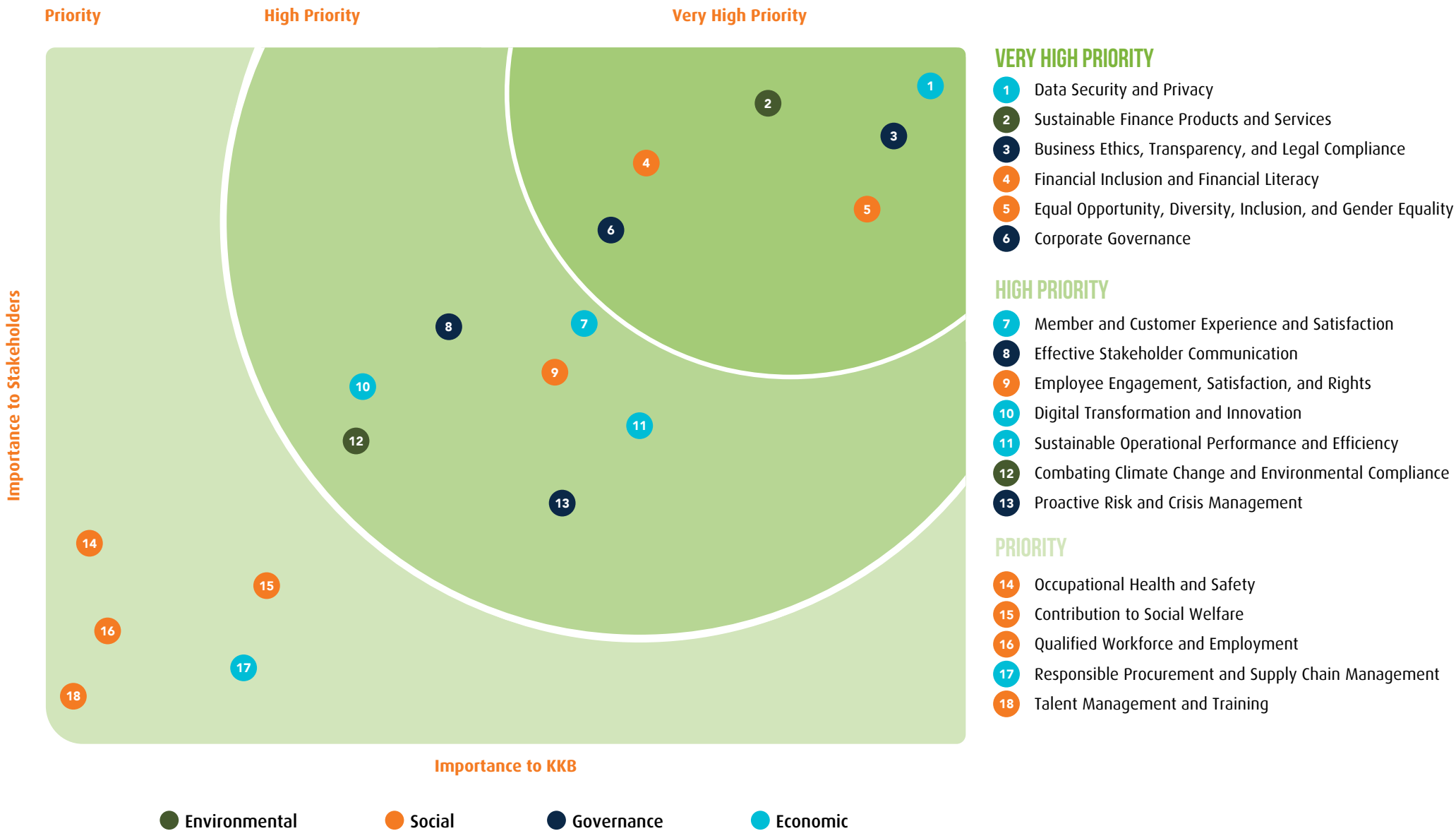
The findings from the stakeholder survey were evaluated together with our company strategy and sustainability goals to create the **Materiality Matrix**. The matrix allows each topic to be measured based on its **importance to both KKB and its stakeholders**. As a result of the evaluation, the topics were classified into three main categories:

- **Very High Priority**
- **High Priority**
- **Priority**

The identified material topics have also been linked to the **United Nations Sustainable Development Goals (SDGs)**. This approach allows KKB to integrate its local and sectoral priorities with global sustainability goals.
















# MATERIAL TOPICS AND MATERIALITY MATRIX





## OUR CONTRIBUTION TO THE SUSTAINABLE DEVELOPMENT GOALS

PRIORITY LEVEL	MATERIAL TOPICS	CONTRIBUTING SDGs	PRIORITY LEVEL	MATERIAL TOPICS	CONTRIBUTING SDGs
Very High Priority	Data Security and Privacy	 	High Priority	Digital Transformation and Innovation	 
	Sustainable Finance Products and Services	  		Sustainable Operational Performance and Efficiency	 
	Business Ethics, Transparency, and Legal Compliance	 		Combating Climate Change and Environmental Compliance	 
	Financial Inclusion and Financial Literacy	  		Proactive Risk and Crisis Management	 
	Equal Opportunity, Diversity, Inclusion, and Gender Equality	 		Occupational Health and Safety	
	Corporate Governance	 	Priority	Contribution to Social Welfare	       
High Priority	Member and Customer Experience and Satisfaction			Qualified Workforce and Employment	
	Effective Stakeholder Communication	 		Responsible Procurement and Supply Chain Management	 
	Employee Engagement, Satisfaction, and Rights	 		Talent Management and Training	 

 Environmental

 Social

 Governance

 Economic



# SUSTAINABILITY TARGETS

Kredi Kayıt Bürosu shapes its sustainability vision within the framework of environmental, social, governance, and economic (ESG-E) principles and sets tangible targets accordingly. The efforts carried out throughout 2024 focused on both reducing the Company’s environmental impact and creating value for its stakeholders.

The table below shows the 2024 targets, monitoring methods, and results defined within the scope of the Environmental Management System (ISO 14001).

## 2024 ESG-E Targets

Target Objective	Target Description	Target	2024 Results	Target Outcome
Reduction of Electricity Consumption	Reducing the annual average PUE value to 1.4	1.4	1.4	Achieved
Reduction of Electricity Consumption	Generating 3% of consumed electricity using solar power	3%	2.35% (877,505 kWh)	Partially Achieved
Continuously Improving Management System	Closing risks by their due dates	≥90%	100%	Achieved
Continuously Improving Management System	Timely completion of corrective actions	≥90%	100%	Achieved
Carbon and Water Footprint Management	Measurement of carbon and water footprint and reduction activities	N/A	Ankara: 18,324.93 tCO <sub>2</sub> e; Istanbul Varyap Headquarters: 1,687.75 tCO <sub>2</sub> e R&D Center: 30.85 tCO <sub>2</sub> e Water Footprint: Ankara 351,583.54 m <sup>3</sup> , Istanbul Varyap Headquarters: 122,798.19 m <sup>3</sup> R&D Center: 1,801.39 m <sup>3</sup>	Partially Achieved
Management System Continuity	Continuity of ISO 14001 certification	1	1	Achieved

# SUSTAINABILITY TARGETS

Target Objective	Target Description	Target	2024 Results	Target Outcome
Environmental Awareness	Environmental awareness training	70%	70.32%	Achieved
Waste Management	Segregation of waste	1	Ankara: 19.84 tons Total non-hazardous waste diverted from disposal: 16.22 tons Total hazardous waste diverted from disposal: 3.62 tons Istanbul total non-hazardous waste diverted from disposal: 10.1 tons	Achieved
Water Consumption	Rainwater harvesting (the KKB Anadolu DC)	1	255.14 m <sup>3</sup>	Achieved
Water Consumption	Reuse of rainwater at the Istanbul Varyap Headquarters	1	1	Achieved
Plastic Reduction	Reduction of water carboy consumption by installing water purification systems	N/A	52.98% decrease in the first 5 months	Achieved
Climate Risks	Physical and transition risk analyses	1	Analyses regarding climate risks and opportunities were completed	Partially Achieved
Carbon Footprint	Calculation in accordance with the ISO 14064-1 standard	1	0	Partially Achieved
Water Footprint	Calculation in accordance with the ISO 14046 standard	1	0	Partially Achieved



## SUSTAINABILITY TARGETS

### 2024 Strategic Target Achievements

In 2024, in addition to environmental targets, strategic targets related to corporate culture and employee experience were also defined. The achievement status of these targets is provided below:

	Target	Achievement
KR1	To be ranked among the top 50 most desired companies to work for in Türkiye	100%
KR2	To increase the female employment rate to 40%	95%
KR3	To reduce the turnover rate to 12%	100%
KR4	To ensure that each employee participates in at least two development programs per year	100%
KR5	To achieve a 5-point increase in the employee satisfaction survey	100%
KR6	To increase the number of applications for open positions by 10%	100%

### Short, Medium, and Long-Term Targets

KKB defines its sustainability roadmap through short, medium, and long-term targets.

	Future Target	Term	2024 Status
1	Segregation of emission data into Scope 1, 2, and 3	Short	Achieved
2	Consideration of ESG criteria in supplier selection	Short	Achieved
3	Use of water purification systems instead of PET plastic bottles	Short	Achieved
4	Conducting analysis for the reuse of cooling wastewater at the KKB Anadolu Data Center	Short	Achieved
5	Measurement of the WUE value in the KKB Anadolu Data Center's cooling systems	Short	Planned
6	Achieving a 3% reduction in corporate carbon and water footprints per employee	Short	Planned
7	Inclusion of the financial impacts of climate change in risk analysis	Medium	Achieved
8	Development of an emissions reduction methodology	Medium	Achieved
9	Initiation of Net Zero and 1.5°C alignment efforts	Long	Achieved
10	Development of sustainable products and services	Long	Achieved

Additionally, activities such as renewing I-REC certificates, increasing participation rates in sustainability training, and developing social responsibility initiatives are ongoing.

### Strategic Priorities

- **Managed Services:** In 2024, the Digital Document Center was developed, creating a solution for banks' commercial customers to share their documents digitally.
- **Findeks:** Improvements were made to the Findeks platform to enhance the user experience and simplify financial tracking processes.
- **Corporate Social Responsibility:** The "Greendeks" product has enabled institutions to report their ESG and SDG compliance, identify areas for improvement, and access green financing.
- **Corporate Governance:** Within the scope of the "Simplification and Efficiency" strategic priority, efforts were carried out to improve process, product, and organizational efficiency.

In the short term (2025), the goals are to increase the number of Greendeks users, implement carbon footprint monitoring and reduction plans, initiate sustainability assessments in the supply chain, and transition to using I-REC certified clean energy in all operations.

In the medium term (2026–2028), the plan is to complete new data center investments with energy-efficient infrastructures, expand energy efficiency projects across all facilities, and meet consumption needs from renewable sources through Solar Power System (SPS) investments. In the long term (2029 and beyond), in line with Türkiye's 2053 Net Zero vision, the goals are to control Scope 3 emissions, integrate ESG criteria into all products and services, and embed ESG scoring systems into Findeks and corporate scoring systems.



## MEMBERS

Member Type	2018	2019	2020	2021	2022	2023	2024
Bank	52	53	54	55	57	63	64
Factoring	59	56	55	54	49	49	48
Financial Leasing	24	23	22	22	21	20	19
Consumer Finance	14	15	15	17	19	20	24
Asset Management Company	18	21	18	21	23	24	24
Insurance and Other	13	13	14	16	17	18	18
Total	180	181	178	185	186	194	197*

\* As of 31 December 2024, the number of KKB members is 185 and this figure identifies the members who are served through the Risk Center.

## BANKS

AKBANK T.A.Ş.
AKTİF YATIRIM BANKASI A.Ş.
ALBARAKA TÜRK KATILIM BANKASI A.Ş.
ALTERNATİF BANK A.Ş.
ANADOLUBANK A.Ş.
ARAP TÜRK BANKASI A.Ş.
BANK MELLAT HEADQUARTER TAHRAN-ISTANBUL TÜRKİYE MAIN BRANCH
BANK OF AMERICA YATIRIM BANK A.Ş.
BANK OF CHINA TURKEY A.Ş.
BANKPOZİTİF KREDİ KAL BANK A.Ş.
BİRLEŞİK FON BANKASI A.Ş.
BURGAN BANK A.Ş.
CİTİBANK A.Ş.
D YATIRIM BANKASI A.Ş.
DENİZBANK A.Ş.
DESTEK YATIRIM BANKASI A.Ş.
DEUTSCHE BANK A.Ş.
DİLER YATIRIM BANK A.Ş.
DÜNYA KATILIM BANKASI A.Ş.

ENPARA BANK A.Ş.
FİBABANKA A.Ş.
GOLDEN GLOBAL YATIRIM BANKASI A.Ş.
GSD YATIRIM BANK A.Ş.
HABİB BANK LIMITED HEADQUARTERS PAKISTAN-ISTANBUL TÜRKİYE MAIN BRANCH
HAYAT FİNANS KATILIM BANKASI A.Ş.
HEDEF YATIRIM BANKASI A.Ş.
HSBC BANK A.Ş.
ICBC TURKEY BANK A.Ş.
INTESA SANPAOLO S.P.A. ITALY ISTANBUL MAIN BRANCH
İLBANK
İNG BANK A.Ş.
İSTANBUL TAKAS VE SAKLAMA BANKASI A.Ş.
JPMORGAN CHASE BANK NATIONAL ASSOCIATION HEADQUARTERS COLUMBUS OHIO ISTANBUL TÜRKİYE BRANCH
KUVEYT TÜRK KATILIM BANKASI A.Ş.
MİSYON YATIRIM BANKASI A.Ş.
MUFG BANK TURKEY A.Ş.
NUROL YATIRIM BANK A.Ş.

ODEA BANK A.Ş.
PASHA YATIRIM BANKASI A.Ş.
Q YATIRIM BANKASI A.Ş.
QNB BANK A.Ş.
RABOBANK A.Ş.
SOCIETE GENERALE S.A. PARIS HEADQUARTERS FRANCE ISTANBUL TÜRKİYE MAIN BRANCH
STANDARD CHARTERED YATIRIM BANKASI TÜRK A.Ş. GENERAL DIRECTORATE
ŞEKERBANK T.A.Ş.
T.C. ZİRAAT BANKASI A.Ş.
T. GARANTİ BANKASI A.Ş.
T. SİNAİ KALKINMA BANKASI A.Ş.
T. VAKIFLAR BANKASI T.A.O.
TERA YATIRIM BANKASI A.Ş.
TOM KATILIM BANKASI A.Ş.
TURKISH BANK A.Ş.
TURKLAND BANK A.Ş.
TÜRK EKONOMİ BANKASI A.Ş.
TÜRK TİCARET BANKASI A.Ş.
TÜRKİYE EMLAK KATILIM BANKASI A.Ş.
TÜRKİYE FİNANS KAT BANKASI A.Ş.
TÜRKİYE HALK BANKASI A.Ş.
TÜRKİYE İHRACAT KREDİ BANKASI A.Ş.
TÜRKİYE İŞ BANKASI A.Ş.
TÜRKİYE KALKINMA VE YATIRIM BANKASI A.Ş.
VAKIF KATILIM BANKASI A.Ş.
YAPI VE KREDİ BANKASI A.Ş.
ZİRAAT KATILIM BANKASI A.Ş.

## FINANCIAL LEASING COMPANIES

AT FİNANSAL KİRALAMA A.Ş.
AK FİNANSAL KİRALAMA A.Ş.
ALTERNATİF FİNANSAL KİRALAMA A.Ş.
ANADOLU FİNANSAL KİRALAMA A.Ş.
ARI FİNANSAL KİRALAMA A.Ş.
BNP PARİBAS FİNANSAL KİRALAMA A.Ş.

BURGAN FİNANSAL KİRALAMA A.Ş.
DENİZ FİNANSAL KİRALAMA A.Ş.
GARANTİ FİNANSAL KİRALAMA A.Ş.
HALK FİNANSAL KİRALAMA A.Ş.
İNG FİNANSAL KİRALAMA A.Ş.
İŞ FİNANSAL KİRALAMA A.Ş.
MİNT FİNANSAL KİRALAMA A.Ş.
PERVİN FİNANSAL KİRALAMA A.Ş.
QNB FİNANSAL KİRALAMA A.Ş.
SIEMENS FİNANSAL KİRALAMA A.Ş.
ŞEKER FİNANSAL KİRALAMA A.Ş.
VAKIF FİNANSAL KİRALAMA A.Ş.
YAPI KREDİ FINANCIAL LEASING ANONİM ORTAKLIĞI FACTORING COMPANIES
ABC FAKTORİNG A.Ş.
ACAR FAKTORİNG A.Ş.
AK FAKTORİNG A.Ş.
AKDENİZ FAKTORİNG A.Ş.
AKIN FAKTORİNG A.Ş.
ANADOLU FAKTORİNG HİZMETLERİ A.Ş.
ATILIM FAKTORİNG A.Ş.
BAŞER FAKTORİNG A.Ş.
BAYRAMOĞLU FAKTORİNG A.Ş.
BİEN FİNANS FAKTORİNG A.Ş.
CREDITWEST FAKTORİNG A.Ş.
ÇAĞDAŞ. FİNANS FAKTORİNG HİZMETLERİ A.Ş.
ÇÖZÜM FAKTORİNG A.Ş.
DENİZ FAKTORİNG A.Ş.
DESTEK FİNANS FAKTORİNG A.Ş.
DORUK FAKTORİNG A.Ş.
EKO FAKTORİNG A.Ş.
EKSPO FAKTORİNG A.Ş.
FİBA FAKTORİNG A.Ş.
FİGO FİNANS FAKTORİNG A.Ş.
GARANTİ FAKTORİNG A.Ş.
GSD FAKTORİNG A.Ş.



## MEMBERS

### FINANCIAL LEASING COMPANIES

HALK FAKTORING A.Ş.  
HUZUR FAKTORING A.Ş.  
İSTANBUL FAKTORING A.Ş.  
İŞ FAKTORING FİNANSMAN HİZMETLERİ A.Ş.  
KAPİTAL FAKTORING A.Ş.  
KENT FİNANS FAKTORING A.Ş.  
LİDER FAKTORING A.Ş.  
MERT FİNANS FAKTORING HİZMETLERİ A.Ş.  
MNG FAKTORING HİZMETLERİ A.Ş.  
OPTİMA FAKTORING A.Ş.  
PARA FİNANS FAKTORING HİZMETLERİ A.Ş.  
QNB FİNANS FAKTORING A.Ş.  
SÜMER FAKTORING A.Ş.  
ŞEKER FAKTORING A.Ş.  
ŞİRİNOĞLU FAKTORING A.Ş.  
TAM FİNANS FAKTORING A.Ş.  
TEB FAKTORING A.Ş.  
TERA FİNANS FAKTORING A.Ş.  
TRADEWIND FAKTORING A.Ş.  
ULUSAL FAKTORING HİZMETLERİ A.Ş.  
VAKIF FAKTORING A.Ş.  
VDF FAKTORING A.Ş.  
YAPI KREDİ FAKTORING A.Ş.  
YAŞAR FAKTORING A.Ş.  
YEDİTEPE FAKTORING A.Ş.  
ZORLU FAKTORING A.Ş.

### CONSUMER FINANCE COMPANIES

ALJ FİNANSMAN A.Ş.  
DGFİN FİNANSMAN A.Ş.  
EVKUR FİNANSMAN A.Ş.  
FAİR FİNANSMAN A.Ş.  
HEPSİ FİNANSMAN A.Ş.  
KOÇ FIAT KREDİ FİNANSMAN A.Ş.  
KOÇ FİNANSMAN A.Ş.  
MERCEDES BENZ FİNANSMAN TÜRK A.Ş.  
MERCEDES BENZ KAMYON FİNANSMAN A.Ş.  
OFİSFİNANS FİNANSMAN A.Ş.  
ORFİN FİNANSMAN A.Ş.  
PRATİK FİNANSMAN A.Ş.  
QUICK FİNANSMAN A.Ş.  
TEB FİNANSMAN A.Ş.  
TIRSAN FİNANSMAN A.Ş.  
TOM FİNANSMAN A.Ş.  
TT FİNANSMAN A.Ş.  
TÜRK FİNANSMAN A.Ş.  
TÜRKCELL FİNANSMAN A.Ş.  
VFS FİNANSMAN A.Ş.  
VODAFONE FİNANSMAN A.Ş.  
VOLKSWAGEN DOĞUŞ FİNANSMAN A.Ş.  
ZİP FİNANSMAN A.Ş.

### ASSET MANAGEMENT COMPANIES

ADİL VARLIK YÖNETİM A.Ş.  
ARMADA VARLIK YÖNETİM A.Ş.  
ARSAN VARLIK YÖNETİM A.Ş.  
BİRİKİM VARLIK YÖNETİM A.Ş.  
BİRLEŞİM VARLIK YÖNETİM A.Ş.  
BOĞAZİÇİ VARLIK YÖNETİM A.Ş.  
DENGİ VARLIK YÖNETİM A.Ş.  
DİRİKER VARLIK YÖNETİM A.Ş.  
DOĞRU VARLIK YÖNETİM A.Ş.  
DÜNYA VARLIK YÖNETİM A.Ş.  
EFES VARLIK YÖNETİMİ A.Ş.  
EMİR VARLIK YÖNETİM A.Ş.  
EPS VARLIK YÖNETİM A.Ş.  
GELECEK VARLIK YÖNETİMİ A.Ş.  
HEDEF VARLIK YÖNETİM A.Ş.  
İLKE VARLIK YÖNETİM A.Ş.  
İSTANBUL VARLIK YÖNETİM A.Ş.  
MEGA VARLIK YÖNETİM A.Ş.  
MET-AY VARLIK YÖNETİM A.Ş.  
ORTAK VARLIK YÖNETİM A.Ş.  
POZİTİF VARLIK YÖNETİM A.Ş.  
SÜMER VARLIK YÖNETİM A.Ş.  
TUNA VARLIK YÖNETİM A.Ş.  
YUNUS VARLIK YÖNETİM A.Ş.

### INSURANCE COMPANIES

AKSİGORTA A.Ş.  
ANADOLU ANONİM TÜRK SİGORTA ŞİRKETİ  
ATRADIUS CREDITO Y CAUCION S.A. DE SEGUROS  
Y REASEGUROS HEADQUARTERS SPAIN TÜRKİYE  
İSTANBUL BRANCH  
COFACE SİGORTA A.Ş.  
EULER HERMES SİGORTA A.Ş.  
EUREKO SİGORTA A.Ş.  
GULF SİGORTA A.Ş.  
TÜRK REASÜRANS A.Ş.  
TÜRKİYE SİGORTA A.Ş.  
UNICO SİGORTA A.Ş.

### OTHER

BİRLEŞİK İPOTEK FİNANSMANI A.Ş.  
BORSA İSTANBUL A.Ş.  
İHRACATI GELİŞTİRME A.Ş.  
JCR AVRASYA DERCELENDİRME A.Ş.  
KATILIM FİNANS KEFALET A.Ş.  
KREDİ GARANTİ FONU A.Ş.  
SMALL AND MEDIUM ENTERPRISES DEVELOPMENT  
ORGANIZATION OF TÜRKİYE  
AGRICULTURAL CREDIT COOPERATIVES OF TÜRKİYE  
CENTRAL ASSOCIATION





## BOARD OF DIRECTORS AND SENIOR MANAGEMENT



### Olgun Tufan Kurbanoğlu

*Chairperson of the Board of Directors  
Türkiye İş Bankası A.Ş.  
Assistant General Manager*

Born in Kars in 1971, Tufan Kurbanoğlu graduated from Middle East Technical University (METU), Faculty of Economics and Administrative Sciences, Department of Public Administration. In 1993, he joined Türkiye İş Bankası A.Ş. as an Inspector with the Board of Inspectors. Appointed as Deputy Manager in the Commercial and Corporate Credit Monitoring and Legal Follow Up Department in 2002, he became Unit Manager in the department in 2006, and Regional Manager of Retail Credits Monitoring and Legal Follow Up in 2011. Appointed as Commercial and Corporate Credit Monitoring and Legal Follow Up Department Manager on March 3, 2014, Tufan Kurbanoğlu was appointed as Assistant General Manager on March 25, 2022. With a good command of English, Kurbanoğlu is married and has one child. Kurbanoğlu, who has advanced proficiency in English, is married and has one child. Tufan Kurbanoğlu assumed the position of Chairperson of the Board of Directors of Kredi Kayıt Bürosu in 2024.



### Mehmet Erkan Akbulut

*Vice Chairperson of the Board of Directors  
Yapı ve Kredi Bankası A.Ş.  
Assistant General Manager; Corporate Banking*

Mehmet Erkan Akbulut graduated from Business Administration Department of Faculty of Political Science at Ankara University in 1989. Akbulut began his professional career in 1990 at Yapı Kredi as an Assistant Inspector. Following his auditing career, he held managerial positions as Unit Manager in Credit Management and served as Director in Corporate Banking and Commercial Banking Management. Between 2009 and 2013, Akbulut served as Assistant General Manager responsible for Credit and Risk Management at Yapı Kredi Azerbaijan. After returning to Yapı Kredi, he served as Corporate and Commercial Credits Monitoring and Liquidation Director, and Group Director between 2013-2018. Between 2018-2020, he assumed the position of Corporate and Commercial Credit Allocation Group Director. From August 2020 to August 2021, he served as the Head of Collection and Liquidation Management. Between 2021 and 2024, he served as Assistant General Manager responsible for Credits at Yapı Kredi. As of July 2024, he has been serving as Assistant General Manager in charge of Corporate Banking at Yapı Kredi. He is also a member of the Executive Committee, which started in 2021. Mr. Akbulut also serves as Deputy Chairperson of the Board of Directors of Yapı Kredi Faktoring, Yapı Kredi Leasing and Kredi Kayıt Bürosu.



### Arif Çokçetin

*Member of the Board of Directors  
Türkiye Vakıflar Bankası T.A.O.  
Assistant General Manager; Credit Monitoring,  
Evaluation and Rating*

Arif Çokçetin graduated from Istanbul University, Faculty of Social Sciences, Department of Finance. After working at the Ministry of Finance for a while, he started working at VakıfBank in 1996 and worked as a financial analyst, manager, and president in various units and branches ever since. He was appointed as the Assistant General Manager on July 13, 2020. Currently, Mr. Çokçetin serves as the Assistant General Manager responsible for Loan Monitoring and Financial Appraisal. He served as a Member of the Board of Directors at Vakıf Faktoring A.Ş. from 2013 to 2019. Having been appointed as a Member of the Board of Directors to KKB in 2019, Mr. Çokçetin served as the Chairperson of the Board of Directors between March 2020-2021. Mr. Çokçetin has been serving as a Member of the Board of Directors of KKB since March 2021, and a Member of the Board of Directors of Kredi Garanti Fon A.Ş. since June 2023.



### Ege Gültekin

*Member of the Board of Directors  
Akbank T.A.Ş. Assistant General Manager; Credit  
Monitoring and Follow-up*

Ege Gültekin was born in Aydın in 1969 and graduated from Middle East Technical University, Department of Economics. Subsequently, she earned a Master's degree from The Johns Hopkins Carey Business School. After graduating from Ziraat Bank's Banking School in 1992, she began her career at Ottoman Bank on the Inspection Board. Currently serving as Assistant General Manager of Credit Monitoring and Follow-up at Akbank T.A.Ş., Ege Gültekin also serves as a Member of the Board of Directors at KKB, a Member of the Board of Directors at Ak Lease, and a Member of the Board of Directors at the Risk Center of the Banks Association of Türkiye.



### Gökhan Şahin

*Member of the Board of Directors and General  
Manager*

Born in 1982 in Ankara, Gökhan Şahin graduated with a bachelor's degree in finance and law. He started his professional career in 2005 as an Internal Trade Controller at the T.R. Ministry of Industry and Trade. In 2006, Gökhan Şahin started working as Assistant Sworn Bank Auditor at the Banking Regulation and Supervision Agency. He respectively served as Sworn Bank Auditor, Head of Group, Head of Department between 2006 and 2023, and finally as Deputy Chairperson of the Banking Regulation and Supervision Agency (BDDK) between 2021 and 2023. Gökhan Şahin, who currently also holds a Lawyer's License and Mediation Authorization Certificate, has been serving as the General Manager and a Member of the Board of Directors of KKB as of October 2023 and is married with one child.



## BOARD OF DIRECTORS AND SENIOR MANAGEMENT



### Gökrem Özdemir

Member of the Board of Directors  
T.C. Ziraat Bankası A.Ş.  
Head of Digital Portfolio Management

Gökrem Özdemir, a graduate of the Department of Economics at the Faculty of Economics and Administrative Sciences at Gazi University, completed her Master's degree in Economic Development and Growth at the same university in 2007. Özdemir began her career in 2004 as an Assistant Specialist at the Banking School of T.C. Ziraat Bankası A.Ş., and continued her work as a Marketing Assistant Specialist at the Bank's Istanbul 1<sup>st</sup> Regional Directorate. Having spent 19 years in various roles at Ziraat Bank, Gökrem Özdemir has been serving as the Head of the Digital Portfolio Management Division since 2023. In addition to these roles, Özdemir serves as a Member of the Board of Directors at Kredi Kayıt Bürosu.



### Halil Şahan ELALDI

Member of the Board of Directors  
T. Garanti Bankası A.Ş.  
Director of Risk Solutions, Strategy, and Performance

Born in Ankara in 1981, Şahan Elaldı received his bachelor's degree in Industrial Engineering from Sabancı University. Elaldı started his professional career in 2006 as an Assistant Manager in Retail Loans at Citibank Individual. Between 2008 and 2011, he worked at Garanti BBVA Technology in various roles in retail, SME, and commercial loans, including E2E credit decision automation, process transformation, and several digital and reengineering projects. From 2013 onwards, he managed Retail Credit Risk Strategies, Risk Analytics, Technology, and Innovation at Garanti BBVA. After holding various international information technology project and transformation roles under BBVA Holding-Global Risk Management between 2023-24, Elaldı resumed his role at Garanti BBVA as the Director of Risk Solutions, Strategy, and Performance in 2024. Elaldı also continues to serve as a Member of the Board of Directors at Kredi Kayıt Bürosu as of November 2024.



### Hüseyin Üst

Member of the Board of Directors  
Şekerbank T.A.Ş.  
Assistant General Manager - SME and Business Banking

Hüseyin Üst, a graduate of the Department of Economics at the Faculty of Economics and Administrative Sciences, Marmara University, began his career in 1995 at Şekerbank T.A.Ş. as an Assistant Specialist. Between 1996 and 1999, he served as Assistant Inspector and Senior Assistant Inspector at Şekerbank T.A.Ş. He then worked as a Marketing Manager, Corporate Branch Manager, and Regional Manager. In November 2017, Üst was appointed as Assistant General Manager, and since January 2024, he has been serving as the Assistant General Manager responsible for SME Banking. Hüseyin Üst continues to serve as the Assistant General Manager responsible for SME and Business Banking. Üst also serves as the Chairman of the Board at Şekerbank T.A.Ş. Personnel Social Security Foundation, a Member of the Board of Directors at Şeker Factoring A.Ş., and a Member of the Board of Directors at Kredi Kayıt Bürosu.



### İzzet Oğuzhan Özark

Member of the Board of Directors  
Denizbank A.Ş.  
Assistant General Manager

Born in 1976 in Istanbul, Oğuzhan Özark graduated from the ITU Department of Mathematical Engineering. In 1997, Mr. Özark started his career at Garanti Bank and worked in Retail Banking, SME Banking and CRM Departments. In 2004, Mr. Özark joined Denizbank and continued his career as SME Banking Department Manager, Retail Banking Group Manager and was promoted to Assistant General Manager of Retail Banking Group in February 2014. In 2015, he was appointed to the Board of Directors of Kredi Kayıt Bürosu to represent Denizbank. Since 2022, he has been serving as Denizbank Retail and Private Banking Assistant General Manager.



### Seyit Mehmet Yaydemir

Member of the Board of Directors  
Türkiye Halk Bankası A.Ş.  
Head of Credit Risk Monitoring Department

Seyit Mehmet Yaydemir was born in Kayseri in 1978. He completed his undergraduate education at Dokuz Eylül University, Department of Business Administration in 2002. He received further education at K.I. Language College, New York. In 2004, he started his professional career at Anadolu Finans Kurumu and continued his career as Assistant Inspector, Inspector and Senior Inspector at the Board of Inspectors of Türkiye Halk Bankası A.Ş. between 2006 and 2012. Between 2012 and 2021, he served as Branch Manager at Kurtuluş Branch/Istanbul, Maltepe Branch/Istanbul, Gayrettepe Branch/Istanbul and Mecidiyeköy Commercial Branch/Istanbul, respectively. Since July 2021, he has been serving as the Head of Credit Risk Monitoring Department at Türkiye Halk Bankası A.Ş. Seyit Mehmet Yaydemir also continues to serve as a Member of the Board of Directors of Kredi Kayıt Bürosu.



## BOARD OF DIRECTORS AND SENIOR MANAGEMENT

### Senior Management



**Gökhan Şahin**  
*Kredi Kayıt Bürosu*  
*Member of the Board of Directors and*  
*General Manager*

Born in 1982 in Ankara, Gökhan Şahin graduated with a bachelor's degree in finance and law. He started his professional career in 2005 as an Internal Trade Controller at the T.R. Ministry of Industry and Trade. In 2006, Gökhan Şahin started working as Assistant Sworn Bank Auditor at the Banking Regulation and Supervision Agency. He respectively served as Sworn Bank Auditor, Head of Group, Head of Department between 2006 and 2023, and finally as Deputy Chairperson of the Banking Regulation and Supervision Agency (BDDK) between 2021 and 2023. Gökhan Şahin, who currently also holds a Lawyer's License and Mediation Authorization Certificate, has been serving as the General Manager and a Member of the Board of Directors of KKB as of October 2023 and is married with one child.



**Abdullah Bilgin**  
*Information Technologies and R&D*  
*Department*  
*Assistant General Manager*

Abdullah Bilgin graduated in 1985 from Middle East Technical University, Department of Computer Engineering and received his master's degree from Istanbul University, Department of International Relations in 2002. Mr. Bilgin started his career at Bilpa A.Ş. in 1986 and worked as a Systems Manager at John Deere in the USA. Until 2012, Mr. Bilgin served as Director in charge of System and Network Management at Yapı Kredi Bank's Information Technologies Department and Self-Service Banking Group Manager at Alternative Distribution Channels. Bilgin, who joined KKB in 2012, continues to serve as the Assistant General Manager responsible for the Information Technologies and R&D Department. Bilgin has overseen KKB's digital transformation, the establishment of the KKB Anadolu Data Center, and the KKB Finance Cloud platforms, and he leads KKB's initiatives on the sharing economy in the financial sector.



**Ali Kemal Cenk**  
*Internal Audit Department*  
*Assistant General Manager*

Ali Kemal Cenk, a graduate of METU Business Administration, completed a dual-degree MBA and Master's in Finance (MBA-MSF) at Boston College between 2007 and 2009. Between 2000 and 2012, he served as Sworn Bank Auditor, Group Head, Coordinator of 2011 FSAP Negotiations and Deputy Head of Audit Department at the Banking Regulation and Supervision Agency (BDDK). Mr. Cenk, who took part in the Risk-Based Audit Project established by the BDDK's (Banking Regulation and Supervision Agency) audit system, has also worked on the Risk-Based Audit project related to Fed inspections and on initiatives within the scope of the FDIC. He has received numerous trainings in the U.S. on Risk Management, Basel II-III, internal control, and banking, as well as certifications and trainings in COBIT, ISO27001, ISO22301, TFRS, International Accounting Standards, Oliver Wyman Risk Management, and European Central Bank Eurosystem Macro-Micro Financial Supervision. Ali Kemal Cenk, who has gained expertise in financial regulations and IFRS, information systems and workflow processes, audit information technologies, and query-based AI fraud detection modeling, as well as in leadership and teamwork, continues to serve as the Assistant General Manager of Internal Audit at KKB.



**Burcu Türkmen**  
*Digital Channels, Project and Innovation*  
*Management Department*  
*Assistant General Manager*

Burcu Türkmen completed her undergraduate degree in Management Engineering Department of Middle East Technical University (METU), and her master's degree in Business Administration at Galatasaray University. She began her career in 2004 as a Core Banking Business Analyst at QNB Finansbank (IBTECH), and later held various roles at Turkcell in areas such as Campaign Management, CRM, and Charging Solutions. In the final phase of her career at Turkcell, she led the Digital Channels teams, spearheaded large-scale digital transformation projects, and was responsible for managing large teams. After 15 years of experience at Turkcell, in 2022 she joined Garanti Teknoloji, where she led the Digital Banking teams and, together with her team, guided Garanti BBVA's mobile and internet banking projects. Since 2024, she has been serving at the Kredi Kayıt Bürosu, responsible for Digital Channels, Project and Innovation Management, and Agile Transformation processes. She holds international certifications in agile transformation and leadership.



**Can Ünver**  
*Risk Management Department*  
*Assistant General Manager*

Can Ünver completed his undergraduate degree in the Environmental Engineering Department of Middle East Technical University (METU), and his master's degree in the Business Administration Department of the same university. Ünver began his career in 2005 as a Research Assistant in the Business Administration Department of METU, where he took on responsibilities such as software development and system management in the field of IT. Ünver began working in 2011 in the Consulting division of EY Türkiye, where he provided consulting services to numerous organizations across various sectors and rose to the position of Senior Manager. Ünver joined KKB in 2018 as the Corporate Risk Management Manager, taking on the responsibility for managing the institution's strategic, operational, legal, and reputational risks, as well as overseeing corporate strategic planning. Since 2023, he has been serving as the Assistant General Manager of Risk Management.



**Caner Altuntaş**  
*Corporate Strategy Department*  
*Assistant General Manager*

Caner Altuntaş, who completed his high school education at TED Ankara College, graduated from Hacettepe University's Department of Economics (English) and Istanbul University Faculty of Law. He began his professional career in 2006 as an Assistant Sworn Auditor at the BDDK, where he served as Group Head in audits of numerous banks and non-bank financial institutions. Representing the BDDK, Altuntaş participated in various working groups and training initiatives, and conducted audits and inspections for the Financial Crimes Investigation Board (MASAK). Between 2013 and 2014, he served as a member of the Consumer Arbitration Committee at the Banks Association of Türkiye and the Participation Banks Association of Türkiye. Since 2020, he has been a registered Mediator with the Ministry of Justice Mediation Department. Caner Altuntaş joined KKB in January 2024 and currently serves as Assistant General Manager in the Corporate Strategy Department.



## BOARD OF DIRECTORS AND SENIOR MANAGEMENT

### Senior Management


**Erşan Rasim Hoşrik**

*Regulatory Compliance, Legal and Operations Department  
Assistant General Manager*

Starting his professional career as an Assistant Inspector at Yapı Kredi Bank in 2006, Erşan Rasim Hoşrik worked in Branch Audit, Head Office Audit and Investigation departments. In 2012, Mr. Hoşrik left the Board of Inspectors and worked in the Compliance Office as Financial Crimes Prevention Manager and Banking Legislation Manager, respectively. During his tenure in the Compliance Office, he was involved in coordinating the supervision of the Banking Regulation and Supervision Agency and the Turkish Republic Ministry of Customs and Trade. In addition, Mr. Hoşrik served as representative in the working groups of the Banks Association of Türkiye. He also participated in studies to prepare regulations related to the banking of the Consumer Protection Law. Having joined KKB in June 2016, Erşan Hoşrik works as the Assistant General Manager of the Regulatory Compliance, Legal and Operations Department.


**Hazar Tuna**

*Internal Control Department  
Assistant General Manager*

After graduating from Üsküdar American High School, Hazar Tuna completed his undergraduate degree in Computer Engineering at Purdue University in 2005 and completed his Executive MBA Master's program at Boğaziçi University in 2012. Mr. Tuna started his career in the Corporate Risk Services Department at Deloitte Denetim. He took part in independent information systems audits at banks and information systems risk security and Sarbanes-Oxley audit-related work in the real sector. Mr. Tuna continued his career in the IT Audit Department of Yapı Kredi Bank and also conducted the pilot installation of the audit workflow software for the entire UniCredit Group and played a role in shaping the final version. Mr. Tuna assumed his position with the responsibility of establishing the internal control environment at KKB and has been serving as the Assistant General Manager of Internal Control since April 2013.


**İnci Tümay Özmen**

*Financial Reporting and Financial Affairs Department  
Assistant General Manager*

İnci Tümay Özmen, who has 28 years of professional experience, completed her education at Saint Benoit French High School and graduated with distinction from Boğaziçi University's Department of Business Administration in 1995. She began her professional career in 1995 at Ernst & Young Audit, where she worked on audit services for numerous organizations in the financial sector. In 2000, she earned the title of Certified Public Accountant and continued her career at the same firm as a Manager. Between 2000 and 2012, she served as Assistant General Manager responsible for Financial Affairs, Budget Reporting, and Operations at Yapı Kredi Leasing, actively participating in the Leasing BDDK adaptation process and the Koçbank-YKB merger processes. Özmen joined KKB in May 2012 and has been serving as Assistant General Manager of Financial Reporting and Financial Affairs since October 2014. In 2017, she was authorized as an Independent Auditor by the Public Oversight, Accounting, and Auditing Standards Authority. Özmen also holds a professional coaching certification.


**Nil Durukanoğlu**

*Human Resources Department  
Assistant General Manager*

Nil Durukanoğlu graduated in 1999 from Istanbul University, Faculty of Political Sciences, Department of Finance and completed her MBA at Bahçeşehir University in 2019. Nil Durukanoğlu started her career at Pamukbank in 1998. She worked as the Quality and Training Manager at Fortis Bank in 2002, Recruitment and Career Planning Manager at Türk Ekonomi Bank between 2005-2013, and Human Resources Partner at the same bank between 2013-2017. Joining DenizBank in 2017, Ms. Durukanoğlu served as the Head of the Bank's Academy Development Department during her tenure. Most recently, Ms. Durukanoğlu served as Human Resources Director at Boyner Holding, and assumed her role at KKB in 2020. Nil Durukanoğlu continues to serve as the Assistant General Manager of Human Resources Department at KKB.


**Dr. Orkun Deniz**

*Risk Center Services and Data Management Department  
Assistant General Manager*

Orkun Deniz graduated from Boğaziçi University, Department of Computer Engineering. He continued his academic studies at Yeditepe University, first receiving his MBA and later his doctorate degree in Management and Organization. He started his professional career at Akbank as a Software Developer in the IT Department. In 1997, Mr. Deniz joined the founding team of Kredi Kayıt Bürosu and continued his professional career at Fortis Bank, where he served as Director in the Corporate Credits Department. Mr. Deniz rejoined KKB in 2011 as Project and Process Management Manager, developing new products and services and expanding KKB's product range. Later, he directed all relations with the financial sector as the Manager of the Banks and Financial Institutions Unit. Orkun Deniz is the Assistant General Manager of Risk Center Services and Data Management Department. Mr. Deniz is also a Member of the Board of Directors of the Association of Credit Bureaus in Europe (ACCIS) and the Association of Credit Bureaus in Eurasia (ACIPE).


**Serkan Siyasal**

*Product Management, Marketing, and Sales Department  
Assistant General Manager*

Serkan Siyasal graduated from Marmara University Faculty of Law in 2006, and started his professional career at Garanti Payment Systems. He established the Call Center and Loyalty Management Systems of Betek Boya. He continued his career as a Project Manager at Dışbank Risk Management, and founded his own venture in payment systems in 2006. After a four-year period, Mr. Siyasal assumed the role of Consultant to the General Manager at Provus and took part in numerous projects during the sale of Provus to MasterCard. In 2012, Mr. Siyasal joined KKB as the Decision Support Systems Manager and assumed the role of Findeks Marketing and Sales Manager in 2014. In 2016, Siyasal took on the role of Director of Product Management and Development; he continues to serve as the Assistant General Manager of the Product Management, Marketing, and Sales Department.





# CORPORATE GOVERNANCE AND COMMITTEES

## AN APPROACH

# THAT PRIORITIZES INSTITUTIONALIZATION

Kredi Kayıt Bürosu (KKB) aims to be one of the most preferred companies to work for, with its competent staff. The corporate culture is built on a foundation that upholds fairness among employees, encourages unity, and prioritizes institutionalization. Processes are operated in line with best practices, ensuring a high level of employee satisfaction.

In 2024, "Simplification and Efficiency" was identified as a strategic priority. In this context, the focus was on optimizing processes, products, technologies, and organizational structures, and improvements were made to enable employees to work effectively and purposefully.

## STRATEGIC MANAGEMENT APPROACH

KKB holds various certifications as part of its corporate governance practices, including The ISO 14001 Environmental Management System certification and the LEED Platinum certification.

KKB has integrated its environmental and sustainability-focused policies with its corporate governance approach. In this context, the following are implemented:

- Environmental Policy,
- Procedure for Determining Environmental Aspects and Impact Assessments,
- Waste Control and Management Procedure,
- Environmental Management System (EMS) Planning Procedure,
- Roles, Responsibilities, and Competency Guide,
- EMS Communication Guide,
- EMS Scope Document,
- Environmental Aspect and Impact Assessment List,
- EMS Annual Plan and Tracking List,
- Waste Tracking List,
- Project Management Environmental Safety Form,
- Environmental Incident Record Form,
- List of Externally Sourced Documents, and
- Emergency Action Plan. These documents ensure the effective implementation of sustainability policies.







## CORPORATE GOVERNANCE AND COMMITTEES

# COMMITTEES WITH EXPERTISE IN THEIR FIELDS

### Committees Reporting to the Board of Directors

#### Disciplinary Committee

The Disciplinary Committee is responsible for identifying behaviors that violate the Human Resources Disciplinary Regulation and applying appropriate disciplinary sanctions. The Committee convenes with the participation of the Regulatory Compliance and Operations Manager and relevant department managers to evaluate the results of investigation processes. Meeting as necessary, the Committee ensures that disciplinary processes are conducted transparently and fairly.

#### Audit Committee

The Audit Committee evaluates the activities of the Internal Audit, Regulatory Compliance and Operations, Internal Control, and Risk Management units and shares its findings with Senior Management and members of the Board of Directors. The Committee convenes at least twice a year with the participation of senior management representatives and Board members to ensure the integrity of the Company's audit processes.

#### KKB Steering Committee

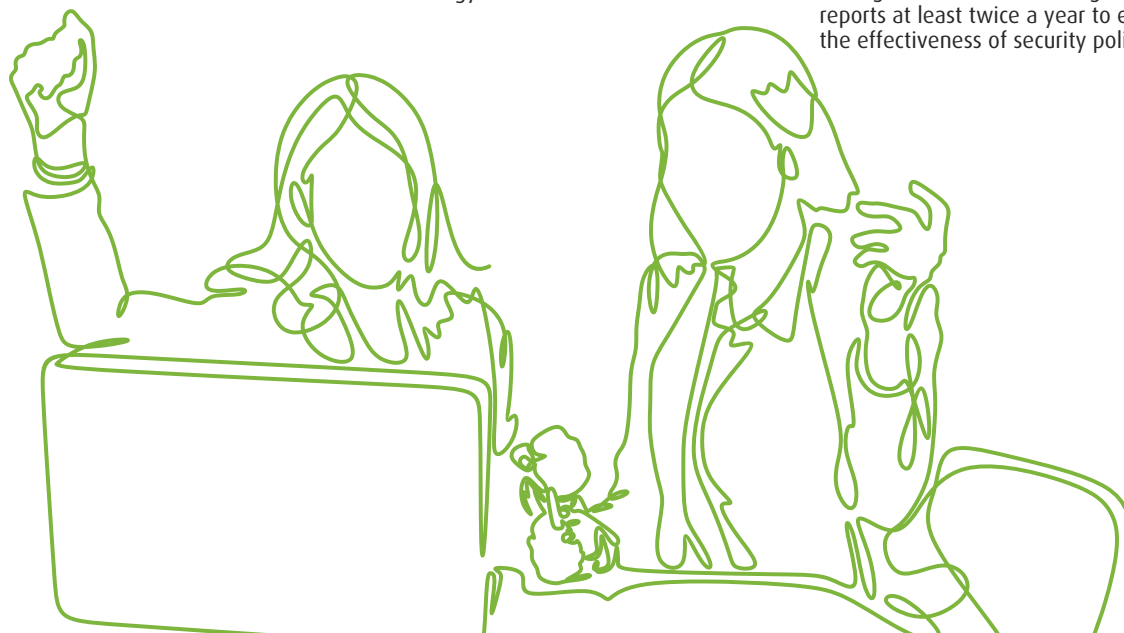
The KKB Steering Committee carries out activities related to the current status of the Company's financials, alignment with strategic targets, and the evaluation of new products and services. Additionally, briefings on strategically important activities are also addressed on the committee's agenda. The committee convenes regularly with the participation of relevant department managers to contribute to the effective implementation of the Company's strategy.

#### Information Security Committee

The Information Security Committee evaluates the Company's information security processes and changes to its operations, and determines the necessary resources and coordination requirements to address potential security vulnerabilities. It also informs senior management about information security breaches within the Company and global developments. The committee, which convenes monthly with the participation of the General Manager and relevant managers, reports at least twice a year to ensure the effectiveness of security policies.

#### Business and IS Continuity Committee

The Business and IS Continuity Committee identifies potential crisis scenarios and prepares action plans. Within the scope of these scenarios, it evaluates the resource needs and necessary changes for the business continuity function. Additionally, current risks, actions taken, and the status of drills are regularly discussed on the committee's agenda. The committee convenes at least twice a year with the participation of senior management representatives and relevant function managers to ensure the uninterrupted maintenance of business continuity.





## CORPORATE GOVERNANCE AND COMMITTEES

# COMMITTEES THAT MAKE A DIFFERENCE WITH THE POWER OF EXPERTISE

### Information Systems Strategy Committee

The Information Systems Strategy Committee evaluates the alignment of the Company's information systems strategies with its business objectives and the implementation of the strategy plan. Additionally, the suitability of investments, the need for revisions, and the activities of the Information Systems Steering Committee are also reviewed by this committee. The committee convenes at least twice a year with the participation of Board members, the General Manager, and relevant senior executives to ensure the strategic alignment of information systems investments.

### Information Systems Steering Committee

The Information Systems Steering Committee prioritizes resource requirements in line with information technology strategies, monitors critical projects, and evaluates the suitability of the information systems architecture. The committee's responsibilities include preparing the annual information systems budget for approval and examining the impact of investments on the Company's risk profile. Chaired by the General Manager and convening at least twice a year with the participation of senior executives, the Committee plays a guiding role in information technology management.

### AI Management Committee

The Artificial Intelligence Management Committee determines the Company's artificial intelligence strategies and evaluates the strategic alignment of existing and new projects. It also determines the priority order of investments and resources, and informs senior management about high-priority risks. Convening at regular intervals with the participation of the General Manager and relevant managers, the Committee ensures the effective implementation of the Company's artificial intelligence approach.

### Sustainability Committee

The Sustainability Committee establishes the Company's sustainability strategy, policies, and targets, and reviews current practices in line with national and international regulations and developments. The committee's responsibilities include identifying environmental, social, and economic risks and their impacts, as well as measuring, monitoring, and reducing carbon and water footprints. Additionally, activities are carried out to integrate a sustainability culture into the corporate structure and to raise employee awareness. The committee, chaired by the General Manager and convening at least once a year with the participation of senior management representatives, ensures the monitoring of sustainability performance.

### Project Steering Committee

The Project Steering Committee evaluates the strategic alignment, costing, and prioritization processes of projects, and informs senior management about existing projects and potential risks. The committee, which convenes at regular intervals with the participation of senior management and relevant unit managers, ensures that the project portfolio is managed in line with strategic objectives.





## CORPORATE GOVERNANCE AND COMMITTEES

# A TRANSPARENT AND HOLISTIC APPROACH TO CORPORATE GOVERNANCE



### Data Governance Committee

The Data Governance Committee ensures the quality and integrity of the data obtained, stored, and shared by the Company, and makes decisions regarding data validation rules and information architecture. It also evaluates the suitability of projects that may affect the information architecture. The committee, which convenes at regular intervals with the participation of relevant managers, ensures the adoption of a holistic approach to data governance across the organization.

### Process Committee

The Process Committee evaluates changes to be made in the Company's processes, clarifies areas of responsibility, and determines and monitors process performance targets. It also coordinates optimization and automation activities with the support of senior management. Convening regularly with the participation of relevant department managers, the Committee aims to improve the efficiency of processes.

### Technology Architecture Committee

The Technology Architecture Committee supports decision-making mechanisms related to the software, infrastructure, and data architecture that constitute the Company's technology architecture, evaluates alternative distribution channel architectures, and reviews projects for compliance with the technology architecture. The committee, which convenes regularly with the participation of senior management and relevant technical units, ensures the development of the technology infrastructure in line with strategic objectives.

### Change Committee

The Change Committee evaluates the impact of application and system changes on daily operations and their compliance with legal regulations. It also determines the measures required to minimize the risks associated with the planned changes. Convening as needed with the participation of relevant managers, the Committee ensures that system changes are implemented in a controlled manner.

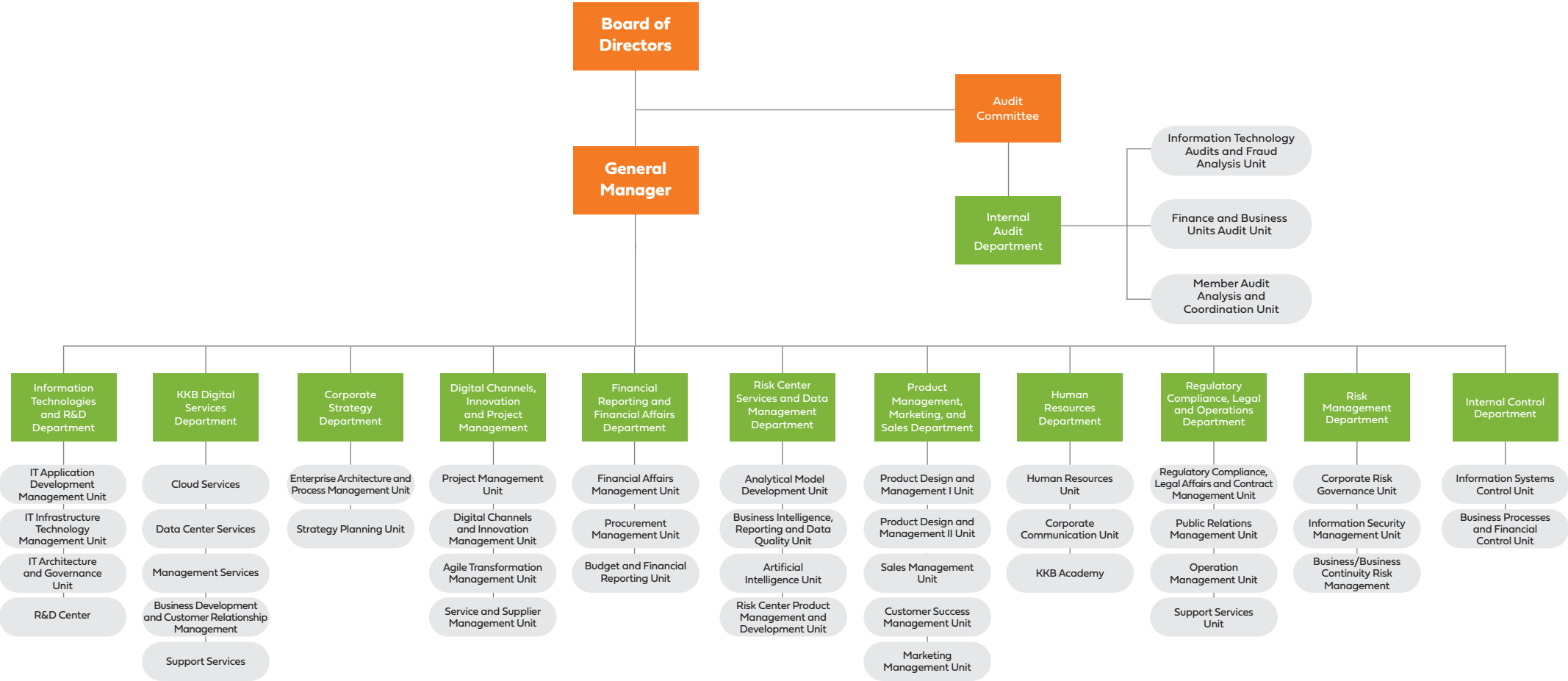
### Internal Audit Committee

The Internal Audit Committee reviews audit plan information, findings from completed audits, overdue and incomplete issues, and revision requests. The committee, which convenes with the participation of the managers of the audited units and relevant personnel when necessary, ensures the effectiveness of the audit processes.

### Service Management Committee

The Service Management Committee determines the scope, policy, and objectives of service management in line with the Company's strategies and raises awareness for meeting service requirements. It also oversees the compliance of activities with laws and the provision of adequate resources. The committee, which convenes regularly with the participation of senior management representatives and relevant managers, ensures that risks related to service management are identified and effectively managed.

ORGANIZATIONAL STRUCTURE



\* The above Organization Chart was approved at the KKB Board of Directors Meeting held on 19/06/2024.



## PROACTIVE RISK AND CRISIS MANAGEMENT

# RISK MANAGEMENT ALIGNED WITH STRATEGIC OBJECTIVES

Kredi Kayıt Bürosu's risk management approach is based on ensuring that activities are carried out in a reliable, effective, uninterrupted, and sustainable manner, while supporting decision-making processes in line with the Company's risk appetite. Accordingly, risks are classified under strategic, operational, financial, and reputational categories, with reference to international corporate risk management standards such as COSO ERM and ISO 31000.

The Risk Management Department evaluates the risks and opportunities that may arise in the process of achieving the Company's mission, vision, and strategic priorities with a methodological approach, contributes to the determination of strategic objectives using the Objectives and Key Results (OKR) methodology, and reports the relevant outputs to senior management at regular intervals.

In line with its ISO 27001:2022 Information Security Management System, ISO 22301:2019 Business Continuity Management System, ISO 20000-1:2018 Service Management System, and ISO 14001:2018 Environmental Management System certifications, KKB conducts risk assessment activities in compliance with national and international frameworks. In this context, end-to-end risk assessment is carried out through analyses conducted at the product, service, process, and supplier levels, and critical assets and workflows are regularly reviewed.

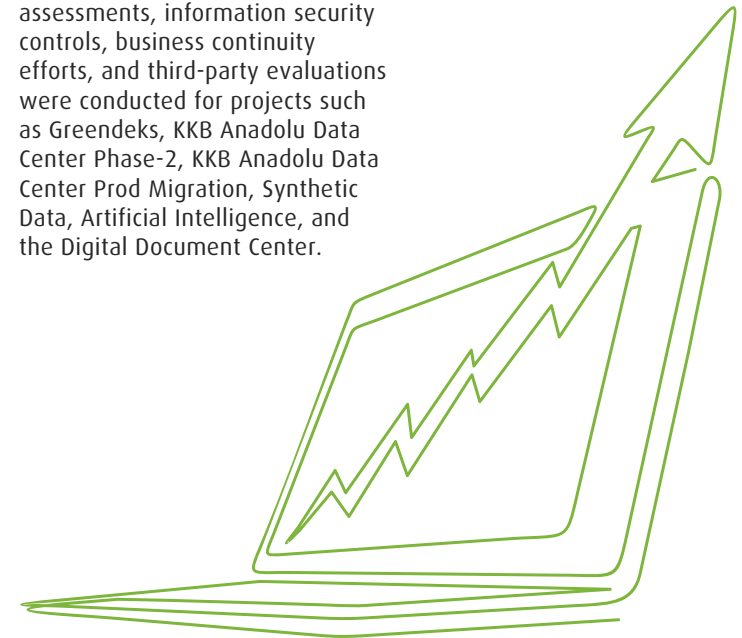
The ISAE 3402 Type-2 Assurance Audit, conducted by independent audit firms since 2018 as part of KKB Anadolu Data Center operations, was also completed in 2024, and the resulting Assurance Report was shared with stakeholders. This practice has significantly reduced the audit burden for both KKB and

the parties receiving the service. Additionally, in line with the organizational changes made in 2024, inventories were updated, and certification efforts for TS EN 50600-3 Data Center Operation, ISO 27017 Information Security in Cloud Services, and ISO 27701 Personal Data Management were initiated.

In 2024, risk assessment and business impact analyses were carried out for approximately 260 active products and services, 425 suppliers, 900 processes, and nearly 5,000 assets, identifying significant improvement opportunities in the processes. The automation and optimization of processes using technology were prioritized, with notable developments including the automation of cybersecurity and threat monitoring operations, automation of source code analyses, migration of business continuity documentation to the GRC system, implementation of

pre-questionnaire practices in third-party risk assessments, and optimizations made in the central log collection system.

KKB's risk management activities have progressed in an integrated manner with the projects carried out. During 2024, risk assessments, information security controls, business continuity efforts, and third-party evaluations were conducted for projects such as Greendeks, KKB Anadolu Data Center Phase-2, KKB Anadolu Data Center Prod Migration, Synthetic Data, Artificial Intelligence, and the Digital Document Center.







## PROACTIVE RISK AND CRISIS MANAGEMENT

# CONTINUITY AND ASSURANCE-FOCUSED PROCESSES

Crisis management is designed to ensure preparedness against internal and external factors that could threaten the Company's reputation, operations, financial structure, information security, and the safety of its employees. The Crisis Management Process is carried out in an integrated manner with Emergency Management, the Business Continuity Management System, the Information Security Management System, and the Service Management System. It is reviewed annually by the Business and IT Continuity Committee and updated when necessary. Crisis scenarios, responsible teams, and backup plans are determined in advance, and the crisis desk structure is operated under the chairmanship of the General Manager. Scenario-specific crisis desks and support desks are established, decisions made are recorded, and the effectiveness of the processes is tested regularly.

In 2024, the risk management strategy was updated to cover climate risks, operational risks, cyber threats, and legal compliance risks. In this context, physical and transition risks arising from climate change were analyzed, regular penetration tests were conducted against cyber threats, and sectoral regulations were closely monitored. Risk management activities, based on the COSO ERM Framework and ISO 31000 principles, were structured in a way that is adopted by all units, and were monitored and reported through the GRC (Governance, Risk, Compliance) platform.

Corporate workshops, surveys, process dependency analyses, third-party evaluations, SWOT analyses, incident inventory, and historical data were used to identify and prioritize risks.

Risks were prioritized using impact and probability matrices and managed through mitigation, transfer, avoidance, and acceptance strategies. Within the scope of business continuity, business impact analyses were conducted in accordance with ISO 22301 standards, critical products and services were identified, recovery plans were prepared, and the relevant reports were submitted to the BDDK, TCMB, and the Risk Center.

The Tier IV certified KKB Anadolu Data Center in Ankara has ensured operational continuity with redundant energy systems, geographic redundancy, and disaster recovery centers. The KKB Anadolu Data Center Phase-2 investment, planned for completion in 2026, aims to further strengthen resilience.

Within the scope of audit and control activities carried out in 2024, ISO 27001, ISO 22301, ISO 14001, ISO 20000, BDDK regulations, and independent financial audits were successfully completed; data security, customer database security, and information systems audits were performed regularly. These activities were carried out by the Internal Audit Unit in line with the annual audit plan and reported to the Audit Committee. As a result, KKB's risk and crisis management

approach was designed with a structure that is integrated into the corporate strategy, compliant with international standards, and centered on proactive measures.

In 2025, the goal is to continue improvements to increase risk management maturity, expand the use of automation, and strengthen information sharing within the industry.





## REGULATORY COMPLIANCE, LEGAL AFFAIRS, AND OPERATIONS

# FULL COMPLIANCE WITH LEGISLATION IN CORPORATE PROCESSES

At Kredi Kayıt Bürosu, legal compliance processes are managed with a holistic approach to ensure full compliance of activities with current legislation. The Regulatory Compliance, Legal and Contract Management Unit monitors regulations that directly affect the Company's field of activity, evaluates their potential impacts on existing processes, participates in the development stages of new products and services based on the "compliance by

design" principle, and ensures that the necessary obligations are fulfilled from the design stage onward.

The Unit undertakes a wide range of duties, including the preparation, revision, and negotiation of contracts with members, customers, and suppliers; monitoring of trademark and patent applications and renewal processes; management of trademark/patent objections and complaints; follow-up of lawsuits filed by or against the Company; handling correspondence with administrative authorities; and

providing legal consultancy to all units. The publications of regulatory and supervisory authorities and the Official Gazette are regularly monitored, and relevant issues are reported to senior management.

The Contract Management team ensures coordination between the relevant internal units and the Regulatory Compliance and Legal team to manage contract processes end-to-end. Activities carried out in this context include version and renewal tracking, accelerating negotiation processes, sending reminders to stakeholders, and systematically monitoring contracts. In 2024, systemic improvements to enhance the traceability and reportability of contract processes were completed and went live. Additionally, the contracts of KKB Anadolu Data Center customers were updated in line with the scope of services, allowing for inflation-indexed price increases.

In 2024, significant steps were taken toward the digitalization of legal compliance processes. Analyses to move workflows conducted via email to the system was completed, with a planned go-live in 2025. Efforts to integrate the data inventory into workflows for automatic updates were also initiated. Furthermore, European Union regulations on artificial intelligence and personal data protection were closely monitored, and internal briefings were provided.

The Legal unit is one of the most critical components of the legal compliance processes. As of 2024, the follow-up of various material and moral compensation cases, as well as labor and re-employment lawsuits filed against KKB, has been ongoing. In this context, processes such as lawsuits filed, as well as notices, warnings, or lodging criminal complaints with the prosecutor's office, are managed by the Regulatory Compliance and Legal unit. When necessary, issues are brought to the agenda of the Executive Committee or senior management meetings, and coordination is ensured with external law firms.

KKB operates strong control mechanisms to mitigate legal compliance risks. Business processes, information systems, and financial transactions are regularly audited through the internal control system, and the compliance of activities with legislation is monitored through periodic controls and management reporting mechanisms. In risk assessment processes, legal compliance risks are classified according to their impact, action plans are created, and assigned to relevant parties.

The main legal risks encountered in the Company's operations are defined as personal data security breaches, non-compliance with legislation, violation of license obligations, service interruptions, and contractual disputes with third

parties. These risks are managed through legislative monitoring, contract arrangements, internal controls, audit activities, and external consultancy services. Additionally, processes related to legislative compliance are supported by maintaining regular communication with the Banks Association of Türkiye (TBB) and other professional organizations.

Regular information and training activities are conducted to raise employees' awareness of legal legislation. Publications from regulatory authorities such as the Official Gazette, the website of the Grand National Assembly of Türkiye, the PDPL, and the BDDK are regularly monitored and announced to the relevant parties. When deemed necessary, information is provided on the effects of legislative changes, and the Company's legislation catalog is updated.

KKB is committed to ethical values in all its activities and implements its Ethics Policy accordingly. No ethical violations were reported in the Company during 2024.

As a result of all these processes, there were no legal violations or data security incidents reported to KKB in 2024. This was achieved through strong control mechanisms, systematic audits, and employee awareness.





## INTERNAL AUDIT AND INTERNAL CONTROL

# INTERNAL CONTROL PROCESSES STRENGTHENED BY AUTOMATION

At Kredi Kayıt Bürosu, internal audit activities are conducted within the framework of a risk-oriented methodology, taking into account the Company's short, medium, and long-term strategies and risks. In the audit plan implemented throughout 2024, sustainability, efficiency and simplification, profitability, artificial intelligence applications, agility, data center, and information security processes were identified as priority areas. In this context, Findeks sales and product management, social media, finance and budget management, and procurement processes were also audited, with a particular focus on evaluating the effectiveness of financial controls and business lines.

The Internal Audit Department utilizes data science and machine learning-based analytical methods in its audits. With a strong team of data scientists, projects aimed at detecting anomalies in big data were carried out, and graph algorithms were developed to identify fraudulent attempts. Additionally, profitability analyses of third-party products were conducted, and the performance of services was measured based on personnel, infrastructure, and business

unit costs. Risks related to data center operations were also examined through comprehensive analyses with expert engineering consultants, and necessary measures were identified in the areas of operational sustainability and security.

The issue of sustainability was also specifically addressed in the audit processes, with areas for continuous improvement identified and recommendations developed to ensure a sustainability-based operation across the organization. Additionally, standard template and certification activities were carried out as part of Findeks web service security. In 2024, the audits of two firms were completed, while 17 audit processes continued. In line with the agile transformation approach, audits were conducted to identify anomalies through system and application logs.

The aim is to enhance the effectiveness of audit processes through new technology-oriented projects. With the Management Declaration Automation Project, audits that are currently performed on a sampling basis are planned to be executed through a full automation infrastructure and to

detect anomalies using machine learning algorithms. Additionally, with the license management project, the entire process from the purchase to the use of licenses is effectively monitored, and evaluations are made within the framework of efficiency.

The internal control system is structured within the framework of policy, procedure, standard, and process documents that encompass all of KKB's activities. The Internal Control Department operates under the Audit Committee and oversees the Company's compliance with legal regulations, internal rules, and good practice guidelines. The system was developed with the objectives of protecting assets, ensuring the effective and efficient execution of activities, and maintaining the reliability of accounting and financial reporting.

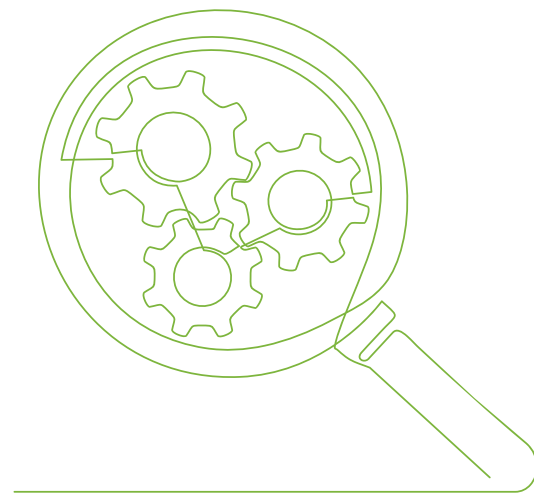
As of 2024, significant transformations have been implemented in internal control processes. To go beyond routine controls, the "Control Automation and Analytics Team" was established, and projects based on artificial intelligence and machine learning were developed. The Smart Control System Project was initiated to automatically detect risks and address control deficiencies. In addition,

the "BuBiTuzak Project," developed to strengthen file integrity controls, enables real-time monitoring of changes in critical system files.

Internal control documentation, workflows, and procedures are periodically updated according to their nature, and new control areas are defined in line with the risk assessments conducted each year. In 2024, internal audit studies were conducted for ISO 27001, ISO 22301, ISO 20000, and ISO 14001 standards, within the framework of compliance

with information security, business continuity, service quality, and ESG principles.

In the upcoming period, the goal is to further integrate technology, automation, and artificial intelligence applications into internal audit and internal control activities. In this regard, reducing operational effort, optimizing workload, and continuing sustainability-focused innovations are among KKB's priorities.





## OPERATIONAL PERFORMANCE

# PERFORMANCE-ORIENTED, EFFICIENT AND SUSTAINABLE OPERATIONS

(Number of Inquiries) (million)	2020	2021	2022	2023	2024
CRS Inquiry	631	727	1,030	1,432	1,650
Corporate Bureau Inquiries	73	89	136	174	217
Personal Credit Rating Inquiries	528	614	888	1,300	1,513
Limit Control System (LCS) Inquiries	263	318	521	831	874
IBAN Verification Service	90.1	219.2	321	427	632
Loan Utilization Instant Sharing (KAPS)	225.4	337.5	673	813	1,092
Personal Indebtedness Index (PII)	155.7	182.5	225	249	216
RA Personal Record Search	131.1	130.1	236	328	475

### KKB Member Profile

32.4%  
Banks

4.2%  
Other

5.3%  
Insurance

12.1%  
Consumer Financing

9.6%  
Financial Leasing

12.1%  
Asset Management Companies

24.3%  
Factoring

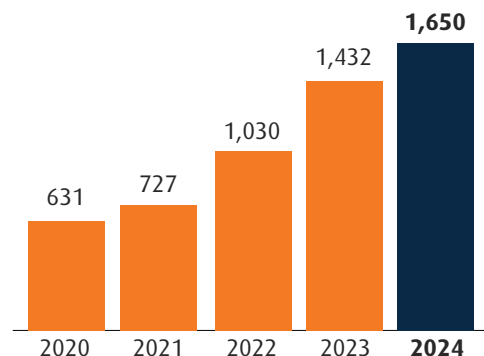




## OPERATIONAL PERFORMANCE

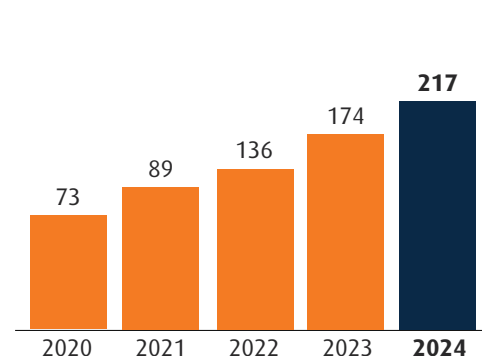
**CRS Inquiry**  
(million units)

**15.2%**  
Increase



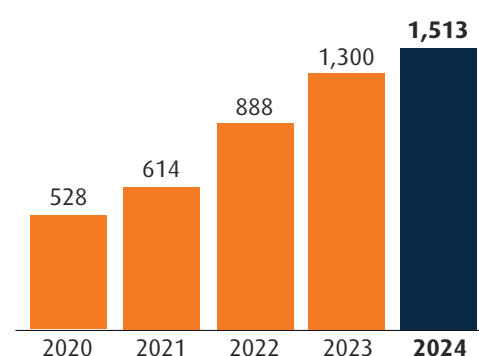
**Corporate Bureau Inquiries**  
(million units)

**24.7%**  
Increase



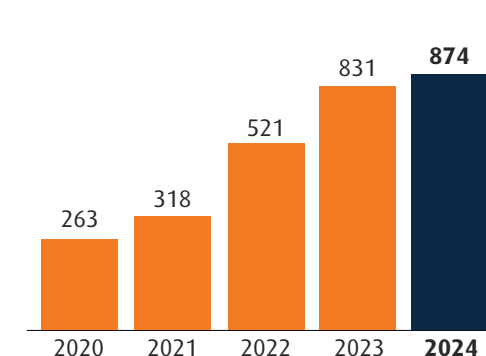
**Personal Credit Rating Inquiries**  
(million units)

**16.4%**  
Increase



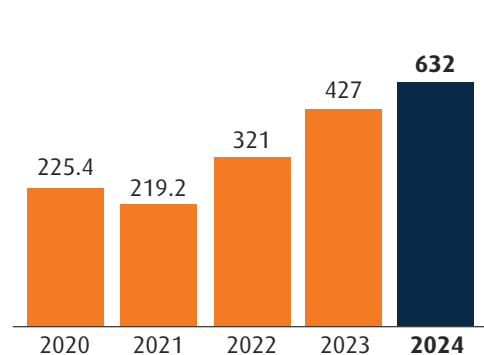
**LCS Inquiries**  
(million units)

**5.2%**  
Increase



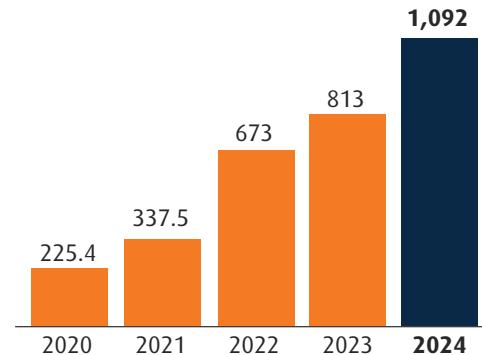
**IBAN Verification Service**  
(Number of Inquiries) (million)

**48.0%**  
Increase



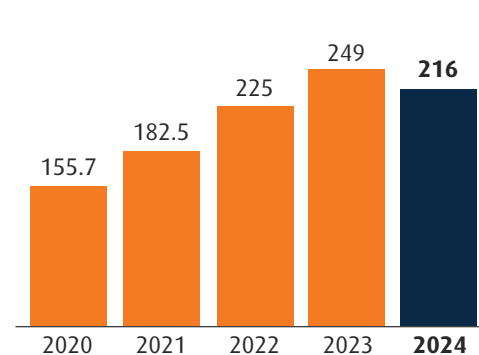
**Loan Utilization Instant Sharing (KAPS)**  
(Number of Inquiries) (million)

**34.3%**  
Increase



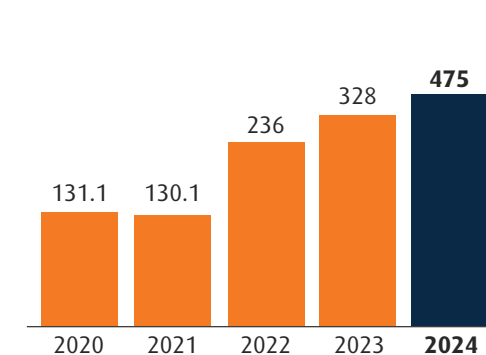
**PII**  
(Number of Inquiries) (million)

**13.2%**  
Decrease



**RA Personal Record Search**  
(Number of Inquiries) (million)

**44.8%**  
Increase







## OUR VALUE-ORIENTED PRODUCTS AND SERVICES

# SUSTAINABLE FINANCE APPLICATIONS THAT SIMPLIFY FINANCIAL LIFE

### KKB HAS RECENTLY BEGUN TO INTEGRATE ENVIRONMENTAL, SOCIAL, AND GOVERNANCE (ESG) DIMENSIONS INTO THE CREDIT ECOSYSTEM.

#### Sustainable Finance

With its central position in the financial system, KKB provides the foundation for the sustainable and sound operation of the credit ecosystem through its data collection and sharing services. The system consolidates data on the past credit payment habits of financial institutions, the real sector, and individuals, making it available to the financial sector and thereby enabling more accurate management of credit risks.

Banks can access the performance of credit applicants at other financial institutions and base their decisions on concrete data. This transparency helps reduce social risks arising from over-indebtedness and payment difficulties, thereby reinforcing trust in the financial system.

KKB has recently begun to integrate environmental, social, and governance (ESG) dimensions into the credit ecosystem. The Greendeks platform, developed for this purpose, provides the financial sector with access to the sustainability index of commercial enterprises. This index, which reflects the environmental and social performance of businesses, allows for the consideration of ESG risks in credit assessments. In this way, KKB's central position in the financial system is evolving into

a holistic structure that assesses not only financial risks but also environmental and social risks.

The Greendeks platform is at the forefront of the reporting and analysis solutions developed within the scope of sustainable finance. Companies measure their performance in ESG areas by answering sector-specific question sets, and as a result, they receive an action plan, a detailed report, and a certificate. Using this data, banks can analyze their customer portfolios based on sustainability criteria. Greendeks also provides businesses with an advantage in accessing national and international green funds. It is an important reference source, especially for sectors with a high environmental impact, such as manufacturing, energy, and agriculture.

The Agricultural Loans Assessment System (TARDES), developed for the agricultural sector, is one of the key tools for sustainable finance. Supporting banks in their credit decisions for farmers, this system assesses the activities and past performance of applicants using data from the Ministry of Agriculture and Forestry records through our Farmer Registration System (ÇKS) product. From 2013 to 2023, over two million credit assessments were conducted for farmers through TARDES, with credit limits exceeding TL 200 billion allocated by the end of 2023. The usage volume of TARDES continued to increase in 2024.

KKB develops its sustainable finance products based on international standards and guidelines. GRI Standards are followed for corporate reporting, while the European Union Taxonomy, United Nations Sustainable Development Goals (SDGs), and relevant ISO standards are considered in product development processes. Additionally, TCFD (Task Force on Climate-related Financial Disclosures) is also integrated into products and services.



## OUR VALUE-ORIENTED PRODUCTS AND SERVICES

# INTERNATIONAL COLLABORATIONS FOR SUSTAINABLE FINANCE

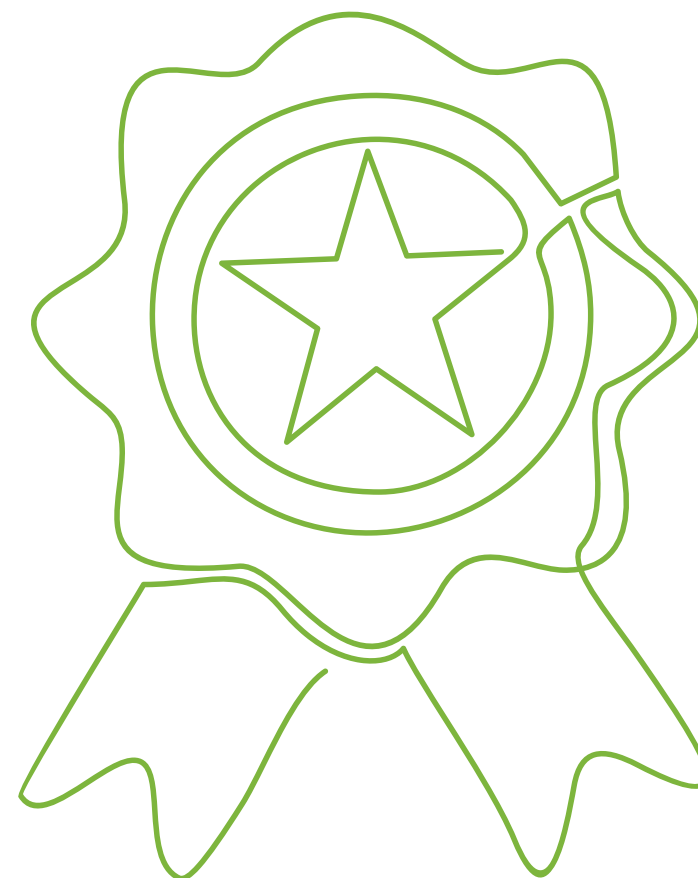
### KKB CONDUCTS TRAINING, PARTICIPATES IN CONFERENCES, RUNS INTERNAL COMMUNICATION PROGRAMS, AND CARRIES OUT DIGITAL CAMPAIGNS TO RAISE AWARENESS OF SUSTAINABLE FINANCE.

Various performance indicators have been established to measure the success of sustainable finance products. These include the number of user institutions, the number of credit assessments performed, the credit limits provided, and service usage volumes. In 2024, tens of thousands of new credit assessments were conducted through TARDES, and an increase was recorded in agricultural credit allocations.

KKB engages in national and international collaborations to advance its sustainable finance services. These collaborations include membership in the European and Eurasian Credit Bureau Associations, ongoing discussions with countries such as Azerbaijan and Uzbekistan, and joint working groups for the banking sector in Türkiye. These activities are important for both information sharing and strengthening the sustainable finance infrastructure. Customer requests and feedback are also taken into account in product development processes. During the pilot implementations of Greendeks, requests for more sectoral detail and clarity in the question sets were evaluated, and the system was dynamically updated. TARDES was also enhanced based on feedback from banks and farmers, making it a more effective decision support tool.

KKB also conducts training, participates in conferences, runs internal communication programs, and carries out digital campaigns to raise awareness of sustainable finance. Product training for member institution employees and presentations at industry summits are prominent activities in this context.

In the upcoming period, KKB aims to expand the Greendeks platform to make the sustainability performance of the financial system more visible, achieve 100% renewable energy use in its operational processes, and extend its sustainable finance solutions on a regional scale through international collaborations.



FINDEKS

COMPREHENSIVE FINDEKS SERVICES SUPPORTING  
FINANCIAL DECISION-MAKING PROCESSES

The Findeks platform offers comprehensive services such as credit rating, risk report, cheque report, Findeks Tracer, Warning Service, and Rating Consultant to support individuals and institutions in their financial decision-making processes.

The Credit Rating is an indicator calculated to predict the likelihood of individuals paying their debts within the next 12 months.

In addition to the credit rating, the Risk Report includes the change in the credit rating, a comparison with the Turkish average, the types of credit products held, total limit and debt information across all banks, the open or closed status of products, and past payment performance.

The Cheque Report provides information on the cheque index, status compared to the Turkish average, the number and amount of cheques paid on time and with delay, bounced cheques, open cheques and post-dated cheques, banks with cheque accounts, and information on endorsed cheques.

Findeks Tracer provides notifications about debt amounts, changes in credit rating, newly opened credit products, total limits, overdue payments, and credit product applications.

The Rating Consultant service is designed for users to schedule an appointment with expert advisors and receive recommendations on how to maintain or improve their credit ratings.

The main criteria used to determine the credit rating are: credit product payment habits (45%), current account and debt status (32%), new credit product openings (5%), and credit utilization intensity (18%). These criteria support the decision-making systems of real sector firms in leasing, installment sales, or credit assessments by providing information on financial credibility.

The Rating Consultant service provides guidance to users on maintaining or improving their credit ratings. According to survey results, the user satisfaction rate reached 4.75 out of 5.

The number of credit rating, risk report, and cheque report inquiries made through the Findeks platform in 2024 are shown in the table below:

Personal Reports	Quantity
Indexed Cheque Report (Personal)	51,546
Findeks Credit Rating (Personal)	463,221
QR Code Cheque Report (Personal)	11,307
Rated Risk Report (Personal)	1,639,802
Risk Report (Personal)	10,128
Cheque Index (Personal)	52
Cheque Report (Personal)	1,306
Total	2,177,362
Third-Party Reports	Quantity
Indexed Cheque Report (Third-Party)	104,894
Findeks Credit Rating (Third-Party)	18,192
QR Code Cheque Report (Third-Party)	1,547,206
Rated Risk Report (Third-Party)	5,087,945
Rated Risk Report (PDF)	7,226
Risk Report (Third-Party)	494
Cheque Index (Third-Party)	4
Cheque Report (Third-Party)	510
QR Code Cheque Record	33,303
Total	6,799,774
Total Number of Inquiries	8,977,136

Findeks also supports the financial management processes of real sector firms. Through a web service, the financial status of customers can be queried before installment sales such as car rentals, mobile phones, and furniture, and third-party credit rating and risk report services can be used.

For banks and financial institutions, the Findeks credit rating and risk report are used as a reference source in evaluating credit products. The credit ratings and risk reports of individual and commercial customers directly contribute to the decision-making processes of these institutions.

4.75

USER SATISFACTION  
RATE



## MEMBER AND CUSTOMER EXPERIENCE AND SATISFACTION

# AN APPROACH THAT PRIORITIZES MEMBER AND CUSTOMER SATISFACTION

### IN 2024, THE “RISK CENTER REPORT ENRICHMENT PROJECT” WAS IMPLEMENTED TO INCREASE MEMBER AND CUSTOMER SATISFACTION.

Kredi Kayıt Bürosu (KKB) considers the continuous improvement of member and customer experience and the enhancement of satisfaction among its strategic priorities. Member satisfaction is regularly measured and monitored throughout the year through surveys, member visits, and meetings. The member satisfaction survey is measured annually on a 5-point scale.

KKB’s member profile consists of banks, finance companies, factoring companies, financial leasing companies, asset management companies, insurance companies, as well as payment, electronic money, investment, and real sector institutions.

In this context, services are provided to various stakeholders in the financial services ecosystem.

Member and customer expectations are collected and evaluated through email channels, corporate and individual working groups, and member representatives. The suggestions and requests received are reviewed by product teams, and products and services are updated as necessary. This approach ensures that the changing needs of members and customers are effectively met.

In 2024, the “Risk Center Report Enrichment Project” was implemented to increase member and customer satisfaction. Within the scope of the project, the Risk Center Report, which is provided to individuals via e-Government, is delivered to individuals and legal entities through the [www.riskmerkezi.org](http://www.riskmerkezi.org) platform, thus providing access to the most up-to-date data. Additionally, the first payment score service, the TRSS score, and Umbrella Models offering some score products together were developed; a cooperation agreement

was signed with TÜBİTAK, and international information sharing was carried out at the ACCIS and ACIPE conferences.

As part of member and customer-oriented digital transformation projects, the “Simplification and Efficiency” strategy was prioritized in 2024. By optimizing processes, products, technologies used, and the organizational structure, a more effective and purpose-driven operation was achieved. In addition, the “Cheque Unification Project,” planned for completion in 2025, was launched. The project aims to report cheque information collected in different data patterns through a single service and data structure, make the cheque lifecycle traceable, reduce operational costs, and provide real-time data transfer to end-users.

Although there is no specific program to increase member and customer loyalty, ongoing collaborations and developed products are carried out with a long-term value creation approach.





## DIGITAL TRANSFORMATION AND INNOVATION

# INNOVATIVE DIGITAL PROCESSES THAT ENHANCE EFFICIENCY AND SECURITY

In 2024, Kredi Kayıt Bürosu (KKB) prioritized digital transformation and automation in its business processes, achieving significant gains in operational efficiency, data security, and sustainable financial management. Methods such as the Project Value Map, Project Proposal Document and Scoring system, Agile Transformation practices (Kanban and Scrum methodologies), and the Quarterly Master Plan transformation supported processes for project prioritization, resource optimization, and shortening the time-to-market for products. As a result, customer risk analysis, data security, and financial sustainability processes were established on a stronger foundation.

Digital transformation and innovation efforts also contributed to reducing environmental impacts. By strengthening digital channels, digitalizing processes, and implementing agile methods, the use of physical documents was reduced, resource planning was made more efficient, and energy and resource consumption were indirectly lowered through the optimization of operational processes.

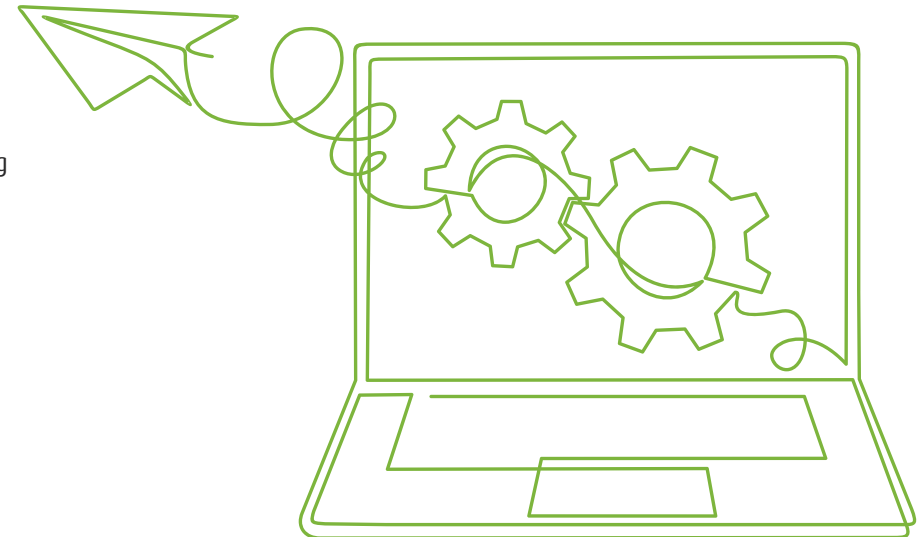
KKB has placed digitalization at the core of its business processes. Agile methodologies are used in project management, and digital platforms like Findeks, as well as web and mobile applications, are continuously developed. Internal and external customer experience improvements are also predominantly carried out through digital channels.

Although the investments and revenue share for digital transformation and innovation in 2024 were not disclosed, these areas remained among the Company's strategic priorities. Innovation and digitalization are positioned as a priority development area in KKB's long-term roadmap.

The goals for 2025 and beyond have been set as deepening the agile transformation, enhancing the user experience on digital platforms, advancing data security to higher levels, and expanding process automation.

Additionally, offering innovative solutions through digital channels and developing products that support financial awareness are among the strategic priorities.

**INNOVATION AND DIGITALIZATION ARE POSITIONED AS A PRIORITY DEVELOPMENT AREA IN KKB'S LONG-TERM ROADMAP.**







## KKB ANADOLU DATA CENTER

# DATA SECURITY AND OPERATIONS MANAGEMENT COMPLIANT WITH GLOBAL STANDARDS

The KKB Anadolu Data Center was established to provide disaster recovery center, backup services, and cloud systems to organizations in various sectors, particularly the financial sector. Designed to TIER IV standards, the facility ensures service continuity with its redundant and fault-tolerant infrastructure. Banks, financial institutions, e-commerce companies, the insurance sector, public institutions, and all private sector organizations with data-intensive operations benefit from the center's services.

In line with energy management and efficiency priorities, the data center uses an adiabatic cooling system, insulated building materials, a DRUPS (Diesel Rotary Uninterrupted Power Supply) system, fuel polishing technology, and hot-cold aisle containment applications. Energy management processes are monitored through SCADA and BMS systems, and consumption is tracked with energy analyzers and meters. As of 2024, the average PUE was 1.4, and customer consumption data was shared through monthly SLA reports.

Additionally, lighting automation (KNX System) was commissioned, and rainwater harvesting systems were implemented.

The use of renewable energy is a fundamental element of the data center's energy strategy. In 2024, 2.35% of consumption was met by solar panels, and feasibility studies are ongoing for capacity expansion and new solar farm projects. As of 2025, a transition to I-REC certified energy was made, with geothermal and biomass sources preferred among renewable energy sources for all electricity consumed, while hydroelectric power was excluded.

To reduce environmental impacts, the carbon footprint is measured regularly and compared with global data center averages. The KKB Anadolu Data Center is the first data center in Türkiye to receive the "LEED Platinum" Green Building Certification. As part of its eco-friendly practices, rainwater is collected and used for green areas, and environmentally sensitive solutions are preferred in product and service selection.

For operational continuity, the data center is managed in accordance with ISO 27001, ISO 22301, and ISO 27701 standards and holds TIER IV design and facility certifications. Data security is ensured through firewalls, access controls, active monitoring systems, and backup protocols, with critical data stored in geographically separate locations. Access to customer devices is restricted, and all processes are carried out under the supervision of an authorized customer representative. The technological infrastructure utilizes management systems such as DCIM, BMS, SCADA, and Alpha Service Manager, with AI-supported monitoring and capacity planning solutions contributing to operational continuity and energy efficiency. As of 2024, the facility reached a capacity of 1,032 cabinets, with plans to expand further through the Phase-2 investment.

The maintenance and operation processes of the data center are carried out through a combination of internal and external resources; expert teams are responsible for system mechanical and electrical operations, with external support used when necessary.

The sustainability of operations is monitored through indicators such as energy intensity, water consumption, renewable energy ratio, and carbon footprint. The ISAE 3402 Type 2 report is obtained regularly, and energy, cooling, and security performance are reported to customers within the SLA framework.

As part of emergency and crisis management, disaster recovery plans are implemented for scenarios such as earthquakes, fires, cyberattacks, and power outages. Disaster recovery tests and drills are conducted annually.

The KKB Anadolu Data Center is built on a 43,000 m<sup>2</sup> plot of land in Ankara and has 2,500 m<sup>2</sup> of white space. It meets high reliability and sustainability standards through Free-Cooling AHU systems, 2N energy redundancy with eight 2000 kVA DRUPS units, NOVEC gas fire suppression systems, and environmentally friendly infrastructure solutions.





## RESPONSIBLE MARKETING AND COMMUNICATION ACTIVITIES

# AN ETHICAL, TRANSPARENT, AND SUSTAINABLE COMMUNICATION APPROACH

### ETHICAL AND TRANSPARENT COMMUNICATION PRINCIPLES ARE ADOPTED IN ALL MARKETING AND COMMUNICATION ACTIVITIES, REACHING THE TARGET AUDIENCE WITH ACCURATE, CLEAR, AND NON-MISLEADING MESSAGES.

Kredi Kayıt Bürosu (KKB) conducts its marketing and communication activities for a broad target audience consisting of the financial sector, the real sector, public institutions, regulatory authorities, and individuals. In this context, members, including banks, leasing, factoring, and insurance companies, are among the Company's primary stakeholders.

Communication efforts are carried out in the form of new product and service launches, announcements of corporate achievements and collaborations, sharing of sustainability-focused projects, and promotion of social responsibility projects. The purpose of these activities is to reinforce a reliable corporate image in the public eye, highlight KKB's contribution to the financial system, and build sustainable relationships with stakeholders.

Ethical and transparent communication principles are adopted in all marketing and communication activities, reaching the target audience with accurate, clear, and non-misleading messages. To reduce environmental impacts, digital channels are prioritized. Through a 360-degree communication approach, the corporate website, social media platforms, press releases, media relations, intranet, mailing, webinars, and various digital tools are effectively utilized. Communication campaigns

emphasize messages focused on reliability, transparency, and value creation through data, with different communication strategies applied for the target audience.

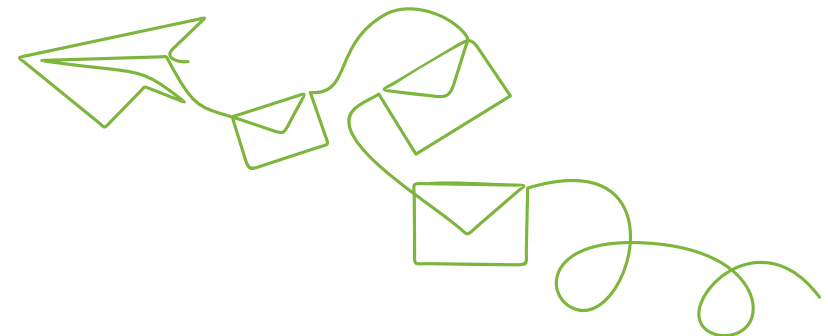
Sustainability is treated as a core component of KKB's corporate communication strategy. In this context, efforts to comply with green building standards, in-office sustainability practices, and training and workshops to raise awareness are carried out. Additionally, both project-based and periodic surveys are conducted for internal and external stakeholders to increase customer satisfaction.

KKB acts in compliance with data privacy and the Personal Data Protection Law (PDPL) in all its communication activities. The explicit consent of participants is obtained for events and similar activities, and the necessary legal and administrative measures for the protection and management of personal data are implemented.

Social responsibility and volunteering projects form an integral part of KKB's marketing and communication efforts. Projects that respond to societal needs, particularly in education, the environment, and financial literacy, are carried out, collaborations are made with non-governmental organizations, and employee volunteering is supported through the KKB Volunteers digital platform.

Internal communication activities aim to inform employees, raise awareness, and encourage participation. In this context,

information security awareness campaigns, projects for sustainability practices, health awareness days, and various social responsibility events were organized. The intranet platform named KKB Meydan, the Journey application, and the volunteering platform are used to inform employees and strengthen internal communication. This allows employees to easily access developments, announcements, information, and projects related to the Company through a digital environment.



## DATA SECURITY AND PRIVACY

# HOLISTIC, SECURE, AND COMPLIANT DATA MANAGEMENT



KKB considers data security and privacy a corporate priority and has established a strong governance structure in this regard. The Information Security Committee is responsible for conducting information security activities, ensuring their alignment with corporate strategies, and, guided by the Information Security Policy, creating and updating the procedures. The Committee regularly convenes to assess existing and potential risks, implement necessary cybersecurity measures, and manage personal data in accordance with the provisions of the Personal Data Protection Law No. 6698 (PDPL). The duties and operating procedures of the Committee are defined under the “Board of Directors-Approved Committees and Operating Principles” framework.

The Information Technologies and R&D Assistant General Manager’s Office and related units are responsible for implementing the established policies and strategies and ensuring that business processes are conducted in compliance with corporate standards. The Risk Management Department ensures the measurement, monitoring, and reporting of risks, while all personnel are obligated to act in accordance with regulations on information security and personal data protection.

At KKB, the policies that form the foundation of data security and privacy include the Information Security Policy, Personal Data Protection and Processing Policy, and Personal Data Retention and Disposal Policy. These policies cover all information processing activities, including customer data, project management software, and digital monitoring systems.

These processes are also conducted in compliance with COBIT 4.1 DS5, ISO 20000, ISO 27001, ISO 27017, and ISO 27701 standards, extending to third-party users accessing KKB’s information technology infrastructure, as well as service, software, and hardware providers.

The data security strategy is built on the ISO 27001 standard. The ISO 27701 certification process was initiated in 2024, and the certificate was obtained in 2025. The strategy incorporates both administrative and technical measures. Prominent technical measures include Data Loss Prevention (DLP) systems, agent-based solutions, Boldon James, Dataverse data dictionary and Datasunrise masking systems. Administrative measures are supported by legal compliance processes, Corporate Risk Management directives, training, and internal audit mechanisms.



## DATA SECURITY AND PRIVACY

# A COMPREHENSIVE DATA PROTECTION STRATEGY FOR THE FUTURE

### TO INCREASE EMPLOYEE AWARENESS, ALL PERSONNEL ARE ASSIGNED ISO 27701, PDPL, AND INFORMATION SECURITY TRAINING VIA THE PORTAL ANNUALLY.

KKB ensures the protection of personal data through legal regulations, taking into account the provisions of the PDPL, the Turkish Penal Code, and regulations from the Banking Regulation and Supervision Agency (BDDK). Throughout 2024, the personal data inventory and the Data Controllers' Registry Information System (VERBIS) record were reviewed, data assessments were conducted in procurement and project management processes, PDPL criteria were applied in third-party risk analyses, and access authorizations were regularly checked.

Technologies used to ensure information security and privacy include DLP, Boldon James, Dataverse, Datasunrise, and disk encryption systems. Additionally, agent-based security solutions such as the Splunk monitoring tool, Cybereason, Trellix, and Delinea Agent have been implemented, along with controls by CDC teams. To prevent unauthorized access to critical digital infrastructures, access is subject to approval mechanisms, secure communication protocols are implemented, and data is protected through masking.

To increase employee awareness, all personnel are assigned ISO 27701, PDPL, and Information Security training via the portal annually. Furthermore, confidentiality agreements are signed by all employees and third parties, and confidentiality and PDPL clauses are added to contracts.

Defense systems have been developed to prevent data security threats; threat intelligence activities and corporate and asset-based risk assessments have been conducted, and data classification solutions using DLP and Boldon James have been implemented. Preparations for ISO 27701 were completed in 2024, and the certificate was obtained in 2025. Looking ahead, plans to strengthen the data security and privacy strategy include detailing policies and procedures, reviewing sensitive data rules in DLP processes, and implementing new technological investments.





## RESPONSIBLE PROCUREMENT AND SUPPLY CHAIN MANAGEMENT

# SUPPLIER MANAGEMENT INTEGRATED WITH ESG CRITERIA



KKB adopts the primary goal of accessing products and services at the right time and at the right price in its procurement and supply chain management. In these processes, it observes the principles of transparency, impartiality, compliance with ethical values, and adherence to the budget. Suppliers are selected from various sectors, including information technology, energy, office equipment, security, and professional consulting, as well as all other areas required by operations, and collaborations are established with numerous business partners from different industries. The 2024 procurement policy is based on achieving fair prices, a strengthened authorization and control structure, decision-making in line with the principle of transparency, and time planning consistent with corporate strategies.

Efforts to ensure sustainability in the supply chain are carried out by the Corporate Risk Management team. In this context, it is planned for suppliers to upload environmental certificates to the system to integrate the supplier selection process into digital systems. Additionally, a questionnaire incorporating environmental, social, and governance (ESG) criteria is being developed for supplier assessments.

Supplier expenditures throughout 2024 were concentrated primarily in information technology and service procurement. The supplier selection process is conducted in line with the budget and the needs of the relevant business unit, in accordance with defined authorization levels. Bids are evaluated, and collaborations are established with the most suitable companies.

The Procurement Planning Commission is also involved to ensure technical requirements are met. Sustainability criteria were also considered in the 2024 assessments, and these efforts were carried out under the coordination of the Corporate Risk Management team.

To improve supply chain processes, the “Supplier Portal” project was initiated in 2024 and has moved to the analysis phase. KKB does not have a supplier award system; contract termination processes are managed by the Contract Management team at the request of the relevant business unit. Risks arising from the supply chain are monitored by the Corporate Risk Management team and provide input into the Company’s overall risk management process.



## HUMAN RESOURCES

# AN HR APPROACH THAT ADDS VALUE TO EMPLOYEES

KKB builds its human resources management on an employee-centric, transparent, fair, and inclusive approach. Within this framework, an inclusive and sustainable human resources policy aligned with corporate strategies has been adopted. Practices that support employee engagement, satisfaction, and development; fair compensation and benefits policies; an inclusive corporate culture that upholds equal opportunity and diversity; and continuous learning and development opportunities are implemented in an integrated manner. KKB, with its strong employer brand approach, aims to prepare its workforce for the future through practices that add value to its employees and strengthen their sense of belonging.



**709** PEOPLE

**TOTAL NUMBER OF EMPLOYEES  
(YEAR-END 2024)**

### Employee Profile

In line with its “employee-centric, transparent, fair, and inclusive human resources” approach, KKB focuses on organizational efficiency, positive candidate and employee experience, talent acquisition and retention, strengthening a collaborative culture, developing trust-based leadership, digitalization of business processes and HR analytics, data-driven decision support mechanisms, agile transformation, and enhancing its employer brand perception.



**11** PEOPLE

**EMPLOYMENT OF PEOPLE  
WITH DISABILITIES**

**148**  
In-Office

**172**  
Hybrid

**389**  
Fully Remote

**WORK MODELS  
DISTRIBUTION**

**439**  
Male

**270**  
Female

**NUMBER OF  
EMPLOYEES**

**206**  
Under 30

**29**  
Over 50

**474**  
30–50

**AGE GROUP/  
PEOPLE**

**81**  
Male

**49**  
Female

**NUMBER OF  
MANAGERS\***

*\*Includes all junior, middle, and senior management levels.*

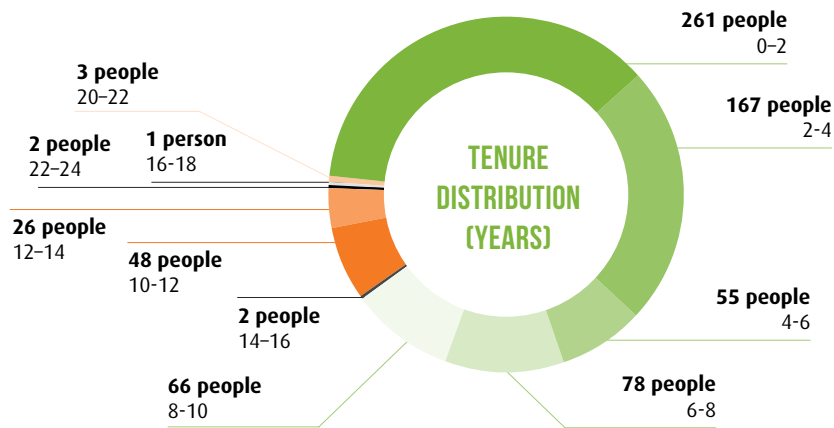




## HUMAN RESOURCES

## PRACTICES

## SUPPORTING EMPLOYEE ENGAGEMENT

**Employee Engagement, Satisfaction, and Rights****Engagement and Culture**

KKB implements various practices to enhance the employee experience and increase organizational belonging. Prominent activities in this context include the “Synergy” gatherings for all employees, the “Momentum” culture ambassadors platform, “Welcome Aboard” meetings for new hires, and the “KKB Talks” and “KKB Works” knowledge-sharing sessions.

In 2024, 559 employees participated in the Synergy event, which concluded with a 94.32% satisfaction rate. Another indicator of employee engagement, the GPTW Trust Index® score was maintained at 74% in 2023 and 2024, while the general perception of being a “Great Place to Work” increased by six points in 2024 compared to the previous year. Based on these results, KKB was successfully included in the “GPTW Türkiye’s Best Employers – Best Large 500-999” list in 2024 and received an award.

A hybrid working model has been in place at KKB since September 19, 2022. In addition to alternative work schedule, the option for location-independent remote work during certain periods, and working/overtime limits that respect work-life balance, there are also bridge holiday practices and standards for annual leave usage.

**Compensation, Rewards, and Benefits**

The compensation policy is based on an “equal pay for equal work” approach and the principles of job family, performance, and competency. A single Life Insurance policy is provided to all employees, regardless of title.

Benefits include; private health insurance, life insurance, a company-contributory private pension system, a meal card, transportation support, educational support and leave (master’s/doctorate), a work-from-home allowance, salary promotions, bonuses, birthday leave, overtime pay, and a tenure-based annual leave accrual system.

Corporate awards are supported by entrepreneurship/R&D, project contribution awards, training and certification achievements, and tenure and special occasion gifts. In 2024, various gifts were given to 242 employees through 69 surprise raffles held across the Company.

Under the private health insurance plan, mini check-ups, psychological counseling, and dietitian support are offered. A holistic wellness platform, social clubs (15 clubs), and workshop events are also available, along with access to a gym and pilates classes at the headquarters.



## HUMAN RESOURCES

# PROGRAMS FOCUSED ON EMPLOYEE DEVELOPMENT AND COMPETENCY ENHANCEMENT

### Talent Management and Training

KKB supports talent development by fostering next-generation competencies, personal development journeys, and programs tailored to specific target audiences.

In 2024, a development center program was implemented for first-level managers with the title of Assistant Manager, creating individual feedback and development plans. A special leadership program for newly appointed managers began in 2024 and is scheduled for completion in 2025. Training was provided to 40 managers leading the agile transformation.

LinkedIn Learning is offered with unlimited access to the entire organization, while Pluralsight, INE, and Interskill licenses are provided for technical teams. Mandatory training and exam tracking, as well as satisfaction

measurement, are conducted via the Journey platform and the KKB Training Platform.

#### 2024 Training Programs

As part of the training activities carried out in 2024, a total of 385 sessions were organized, amounting to 480.5 days\* of training. The scope of the training programs included onboarding and orientation, exam and certification preparation, periodic training catalogs, customized programs, and regulatory authority training and exams.

Prominent activities during the year included approximately 700 employees receiving 144 days of training through 74 special programs, 126 employees attending 31 different conferences and summits, more than 600 people gathering in 14 company-wide open sessions, and the launch of special programs for promoted managers.

Additionally, development center programs were conducted for 27 Assistant Managers, and approximately 500 employees received training on 48 different topics through catalog training published in the spring and fall. Orientations were organized for experienced new hires, supporting the integration of 100 new employees into the Company. In addition, internal knowledge sharing was strengthened through interdepartmental symphony sessions.

As part of the Young Talent Program in 2024, 19 young talents were supported with a total of 27 days and 40 different training sessions during a 1+1 week orientation process. An average of 44 hours of learning per person was achieved through the LinkedIn Learning Challenge, and the program concluded with a graduation in October 2024. In the agile transformation process, a total of 111 employees acquired core agile competencies through training programs consisting of seven sessions held over 12 days.

As part of mandatory and ethics-compliance training, PDPL and Information Security training were delivered to all employees in an e-learning format in 2024. Mandatory online Information Security training was also planned for new hires. Furthermore, reflecting the importance placed on first aid, 26 employees received certified first aid training in 2024, bringing the total number of certified first aiders to 66.



# 480.5

NUMBER OF TRAINING DAYS  
IN 2024



\* 480.5 days were calculated by taking into account multiple training activities conducted simultaneously.



## HUMAN RESOURCES

# A WORKPLACE CULTURE FOCUSED ON DIVERSITY, INCLUSION, AND EQUALITY

### Average Training Hours

	Hours
Senior Management (per person)	64.12
Avg. training hours for leaders	55
Female (per person)	49.35
Avg. training per person (2024)	43
Male (per person)	39.47
Board (per person)	34.58

### Training Hours by Category

	Hours
Team/Task-Based Training	843
Individual Training	807.5
Catalog Training	488
Mandatory Training	352
Program-Based Training	239.5
Orientation	120
KKB Talks	9
Open Training	8.5
KKB Works	4.5

### Equal Opportunity, Diversity, Inclusion, and Gender Equality

Kredi Kayıt Bürosu ensures its stance against discrimination and its principle of equal opportunity through its corporate policies. This approach, based on creating an inclusive corporate culture, is applied in all human resources processes. Practices regarding ethical principles are regulated by the “KKB Ethics Reporting Policy,” which is based on transparency and accountability.

KKB considers diversity and inclusion an integral part of its corporate culture and observes equality and transparency in all human resources processes. There are 11 employees with disabilities working in various departments within the Company. In addition, inclusion practices are strengthened through collaborations with the Women in Technology Association and the Private Sector Volunteers Association. Equal opportunity and transparency are adopted as fundamental principles in promotion and development processes.

The Young Talent Program, which has been running since 2021 to support the employment of young talents, continued successfully in 2024, with 19 young talents included in the program during this period. The 200% increase in application rates and the retention rate reaching 80% demonstrate the program’s success. Additionally, employee career development is supported through internal promotions and job rotations, and the transfer of institutional knowledge is ensured through the “Development Guides” program. This program was also recognized on an industry scale, winning the “Best” award in the TEGEP Internal Trainer Training Program category.

Within the scope of projects supporting social contribution and equal opportunity, KKB’s “You Imagine, We Realize” social responsibility project ideas competition completed its 10<sup>th</sup> edition in 2024. Student projects developed in the fields of environment, education, financial

literacy, technology, and social impact were supported through this competition. Furthermore, the internal entrepreneurship platform Dynamo and the innovation competition “We Have the Solution” contribute to the development of creativity and innovative ideas by encouraging the equal participation of employees.



# 11

**TOTAL NUMBER OF  
EMPLOYEES WITH  
DISABILITIES**



## OCCUPATIONAL HEALTH AND SAFETY

# EMPLOYEE HEALTH AND SAFETY IS THE TOP PRIORITY

Kredi Kayıt Bürosu considers occupational health and safety (OHS) a fundamental component of its corporate culture and continuously develops its policies in this area. Although classified as a low-risk organization, the Company conducts regular checks and inspections through Occupational Health and Safety specialists at its Ankara and Istanbul campuses. Within the scope of Corporate Risk Assessment studies, OHS-related risks are regularly analyzed, and all necessary administrative and technical measures are taken to prevent occupational accidents, occupational diseases, and reduce health problems originating from the work environment.

Insurance services are regularly reviewed to support the health and well-being of employees. In 2024, based on feedback from employees, an agreement was made with Türkiye Sigorta, granting all employees the "right for a mini check-up."

The Company complies with Law No. 6331 on Occupational Health and Safety, Law No. 5510 on Social Insurance and General Health Insurance, Labor Law No. 4857, and all related regulations and communiqués while carrying out its occupational health and safety processes. In this regard, all obligations required by legislation are fulfilled, and regular checks and inspections are conducted. Although there is no management system certification in the field of occupational health and safety, practices are carried out under the coordination of OHS specialists and within the framework of risk management processes.

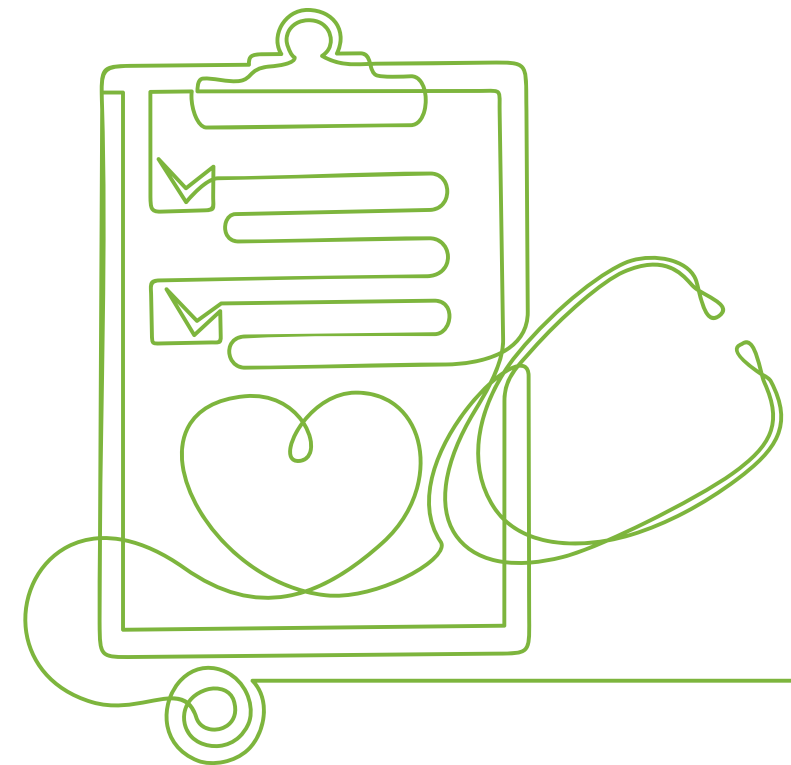
In 2024, employee safety was prioritized during the KKB Anadolu Data Center Phase-2 project, and additional measures were taken in this context. In addition, fire and evacuation drills were conducted, and emergency action plans were prepared and implemented with the relevant teams.

Mandatory OHS training was regularly provided to increase employees' awareness of occupational health and safety. The training is conducted with the goal of ensuring employees adopt a safety culture and become aware of risks.

Within the scope of OHS, emergency plans were prepared, fire and evacuation drills were organized, and rescue teams were formed. Regular checks are carried out by OHS specialists at the Ankara and Istanbul campuses, inspecting all points from fire exit areas to high-risk zones. In the field of ergonomics, ergonomic chairs, desks and monitors are provided to protect employees' physical health; temperature controls in the physical environment are maintained, and the option to work remotely is offered.

OHS performance is monitored and improved in line with the regular checks and recommendations of OHS specialists. The active participation of employees is ensured through drills and the updating and implementation of emergency action plans.

Since many different projects and activities were carried out within the scope of OHS in 2024, the expenditure amount for OHS is not reported as a separate item. However, the OHS performance indicators for 2024 showed a positive trend, with the accident frequency rate, injury rate, number of accidents, and number of lost days all being zero.





# FINANCIAL INCLUSION AND FINANCIAL LITERACY

## FOR

# A FINANCIALLY LITERATE SOCIETY

Kredi Kayıt Bürosu develops comprehensive digital platforms to facilitate access to financial services and increase financial awareness in society. The services offered through the mobile application, internet branch, website, and social media accounts are continuously improved with user experience in mind, and the content is designed to support financial literacy.

Various information and awareness campaigns are conducted to enable individuals and businesses to manage their financial risks more consciously. Campaigns for products and packages offered under the Findeks brand are organized via SMS, email, the website, and social media channels, while content for financial literacy initiatives is planned by the Corporate Communications team. In addition, educational content is shared through Findeks Academy (<https://www.findeks.com/findeksakademi>), and these efforts are managed by both KKB and the Corporate Communications Unit.

Interactive tools, sample reports, informational videos, and in-app guidance content are provided to help customers better understand their credit reports, risk analyses, and

financial situations. With the renewal project implemented within the application, users are informed before making a purchase, and training videos enable more informed reading of reports. Additionally, the “My Findeks Rating Consultant” service offers personalized guidance to help users interpret their financial risk reports more accurately and to maintain and improve their financial credit rating.

User-friendly, simple, and understandable content is developed for customer groups with low levels of financial literacy to help them understand reports more easily; the interfaces of digital platforms are continuously simplified as part of renewal projects.

Customers are also offered self-service transactions, chatbot support, and online consulting services. In addition to the call center and expert rating consultants, the “Bilgiç” chatbot provides users with quick answers to their questions. The “Financial Fit” project aims to help users easily understand their current financial situation and determine the necessary actions.

To raise awareness about credit reports and financial risk management, information is provided through product training videos on the Findeks YouTube channel, Findeks Academy blog posts, social media content, and the frequently asked questions section on the website.

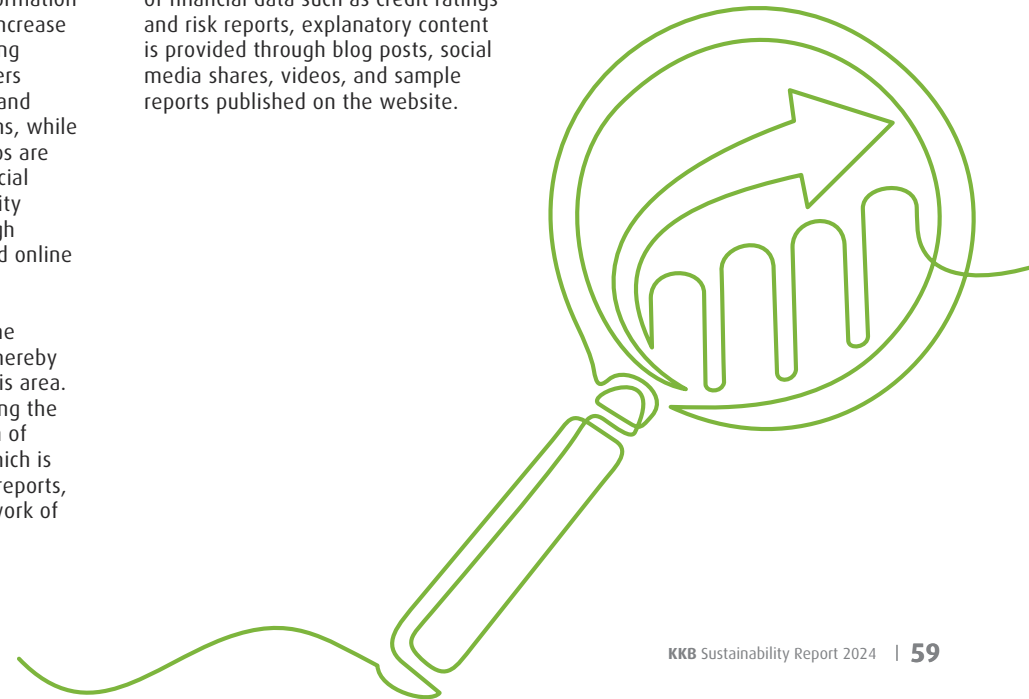
As digital financial services become more widespread, regular information campaigns are conducted to increase cybersecurity awareness among customers. In this context, users are informed via email, SMS, and mobile application notifications, while educational content and videos are shared on the website and social media. In addition, user security awareness is increased through simulations, instant alerts, and online training.

No guidance is provided for the selection of credit products, thereby maintaining competition in this area. However, information regarding the criteria used in the calculation of the Personal Credit Rating, which is based on components of risk reports, is provided within the framework of analytical studies.

In the upcoming period, it is aimed to make mobile and web platforms more user-friendly through redesign projects to strengthen initiatives in financial literacy and inclusion. In addition, financial awareness will be increased through promotional and informational activities conducted on social media.

To ensure the accurate understanding of financial data such as credit ratings and risk reports, explanatory content is provided through blog posts, social media shares, videos, and sample reports published on the website.

**CUSTOMERS ARE ALSO OFFERED SELF-SERVICE TRANSACTIONS, CHATBOT SUPPORT, AND ONLINE CONSULTING SERVICES.**





## SOCIAL INVESTMENTS

# PROJECTS AND INITIATIVES THAT ADD VALUE TO SOCIETY

### SUPPORT FOR YOUTH, WOMEN, AND DISADVANTAGED GROUPS HOLDS A SIGNIFICANT PLACE IN KKB'S SOCIAL INVESTMENTS.

Kredi Kayıt Bürosu has been continuing its social responsibility and volunteering activities in various fields for many years. While education, environment, and financial literacy are priority themes, projects addressing different social needs are also implemented. Employee volunteering is an important component of these efforts, and collaborations with various non-governmental organizations are carried out throughout the year via the KKB Volunteers digital platform.

Positioned at the center of the financial sector, KKB develops technological solutions for both the industry and the private sector and carries out joint projects to place this contribution on a sustainable foundation. Key collaborations supported in this context include the Istanbul Carbon Summit, organized in partnership with the Republic of Türkiye Ministry of Environment, Urbanization and Climate Change, Istanbul Technical University, and the Sustainable Production and Consumption Association; Çevrefest, held by the Ministry as part of Türkiye Environment Week; the collaboration protocol signed with TÜBİTAK BİLGEM covering efforts in cybersecurity, cloud technologies, and artificial intelligence; the Information Technologies Summit organized by the Istanbul Technical University Management Engineering Club; and training seminars with Boğaziçi University's Management Information Systems Department.

In addition, accessibility was provided to Findeks Mobile, Findeks internet branch and Findeks.com users through collaboration with Blindlook, and the EyeBrand award was won in this context.

Projects developed with non-governmental organizations include One Book One Future, Let's Do It Türkiye, Turkish Cancer Society, Laughter Heals Association, Foundation for the Support of Women's Work, Support to Life, Down Syndrome Association of Türkiye, and Change Leaders Association. In addition, donations were made to HACIKO and the Turkish Cancer Society, and awareness projects were carried out for the DMD Families Association, the Hope Foundation for Children with Cancer (KAÇUV), Cerebral Palsy Türkiye, and the Down Syndrome Association of Türkiye.

In the field of financial literacy, technological developments in access to finance and credit scoring systems for SMEs were shared at the "Access to Finance Conversations," held with contributions from TÜRKONFED and DOKASİFED and hosted by ORDUSİAD and OGİD. Additionally, information on the use of artificial intelligence in the financial sector was shared at Roketsan's Strategic Partnership Summit.

The social impact of social investment projects is measured through indicators determined at the project's outset, regular monitoring activities, participant surveys, stakeholder feedback, and the added value created. Success is evaluated based on the level of achievement of set goals, as well as the lasting benefits provided to participants and society.

Support for youth, women, and disadvantaged groups holds a significant place in KKB's social investments. The Company employs 11 individuals with disabilities in various departments, prioritizing disability inclusion. No discrimination is permitted under the diversity and inclusion policies; the employment of women in technology is supported, and an active role is taken in various projects through membership in the Women in Technology Association. Furthermore, as part of the Private Sector Volunteers Association, contributions are made to support disadvantaged groups.





## SOCIAL INVESTMENTS

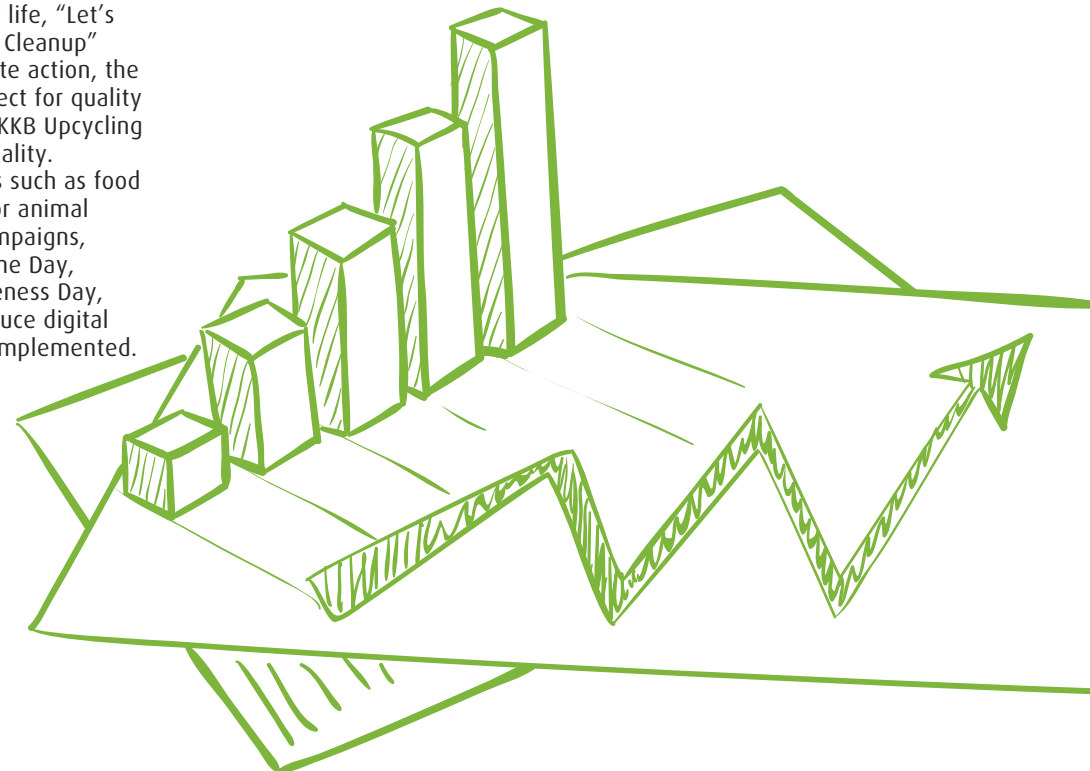
# SOCIAL BENEFIT CREATED THROUGH THE KKB VOLUNTEERS PLATFORM

Within the scope of environmental sustainability, the “You Imagine, We Realize” Social Responsibility Project Idea Competition for university students provides an opportunity to develop innovative ideas in fields such as environment, education, financial literacy, culture and arts, health, sports, and technology. The competition, held since 2013, reached its 10<sup>th</sup> term in 2024. This year’s first prize went to the “Plasticversus” project, which aims to contribute to the circular economy by converting 5 million tons of cotton waste annually into biopolymer and bioplastic raw materials. The second prize went to the “Mergen Tay” search-and-rescue technology project, and the third prize was awarded to the AI-based “Student Assistant” project.

Contributions in the field of education include the Development Guides Training Program, which focuses on transferring institutional knowledge and employee development. Within the program, 517 employees had the opportunity to learn from each other in 125 sessions, and the program received the “Best” award from the TEGEP Internal Trainer Training Program. In addition, the Personal Development Plan application allows employees to specialize in their chosen fields.

As part of its corporate culture, KKB encourages employee volunteering and supports active participation in social responsibility projects. All volunteering activities are conducted through the KKB Volunteers Platform. In 2024, the total volunteering hours reached 282, the platform membership rate was 28.77%, and the active volunteer rate increased to 63%. A total of 19 volunteering projects were implemented in 2024,

receiving 283 applications. These projects included the “Chocolate Workshop” aimed at reducing inequalities, “Run for Goodness at the Istanbul Marathon” for health and quality of life, “Let’s Do It! Environmental Cleanup” contributing to climate action, the “Hayal Çantam” project for quality education, and the “KKB Upcycling Park” for gender equality. Additionally, projects such as food and water support for animal friends, recycling campaigns, World Down Syndrome Day, Cerebral Palsy Awareness Day, and initiatives to reduce digital pollution were also implemented.





## COMBATING CLIMATE CHANGE AND ENVIRONMENTAL COMPLIANCE

# CLIMATE STRATEGY RESTRUCTURED WITH A DATA-DRIVEN APPROACH

Kredi Kayıt Bürosu considers climate change an integral element of its corporate risk management and, within this framework, conducts comprehensive analyses covering physical, transition, and regulatory risks. As of 2024, the climate strategy has been restructured with a data-driven approach, integrated with the financial sector.

KKB's fundamental environmental sustainability approach is built on ensuring high energy efficiency in its data centers, using renewable energy sources, and developing a service infrastructure with minimized environmental impacts. Within the framework of the ISO 14001 Environmental Management System, the goals are to reduce resource consumption in operations, lower the carbon footprint through digitalization

processes, and continuously improve environmental performance.

KKB's written "Environmental Policy" defines the Company's fundamental principles and tenets regarding environmental management. The policy covers all departments within the Company, third-party users accessing KKB locations, and service, software, and hardware suppliers providing technical support to the infrastructure. This policy includes objectives to reduce environmental impacts, increase sustainability-focused investments, and develop environmental awareness among all stakeholders.

Various practices and projects were implemented in 2024 to combat climate change. In this context, efforts were made to procure I-REC certified electricity from geothermal and biomass sources

for 2025, an SPP investment plan was made, a green industry protocol was signed, and the Greendeks product was developed to reduce environmental impact.

In line with Türkiye's 2053 Net Zero Target, KKB has updated its climate strategy to focus on energy efficiency investments in its data centers, increase the use of renewable energy, and prioritize the development of green financial products. As part of this strategy, a long-term roadmap has been created, and an action plan based on climate risks and opportunities has been prepared.

KKB's environmental practices are supported by international standards and certifications. The ISO 14001 Environmental Management System is actively implemented, the procurement of I-REC (International Renewable Energy Certificate) is planned for

2025, and sustainable building standards are adopted at the KKB Anadolu Data Center with LEED Platinum certification.

Regular awareness training on climate change, environmental impacts, and resource management is provided to employees. The scope, duration, and number of participants of the training conducted in 2024 have been recorded in detail, and the relevant lists have been shared within the report.

Future goals include completing SPP investments to meet the entire energy consumption of the data centers and expanding the customer portfolio of the Greendeks product. These goals aim to both reduce internal environmental impacts and contribute to the sustainable transformation of the financial sector.





## REDUCING ENVIRONMENTAL FOOTPRINT AND IMPACT MANAGEMENT

# RESPONSIBLE RESOURCE MANAGEMENT

### Energy and Emissions Management

Kredi Kayıt Bürosu's fundamental energy and emissions management approach is based on energy efficiency and a zero-carbon target. In this context, the goal is to eliminate direct carbon emissions by 2025 through the use of clean energy sources. The Company aims to meet the entire energy consumption of its data center through the ongoing SPP investment project.

A systematic approach is adopted in energy and emissions management, and the ISO 14001 standard is actively implemented. In addition, a gap analysis for the ISO 50001 Energy Management System has been conducted,

and areas for improvement have been identified. Energy efficiency policies are shaped in compliance with ISO 14001, the European Union Taxonomy, BDDK environmental risk frameworks, and LEED standards.

Digitalization processes play a significant role in reducing energy consumption and emissions. The technological solutions developed increase operational efficiency while minimizing environmental impacts.

Location-Based Energy Data	Unit	2024			KKB Total
		Ankara	Istanbul		
		KKB Anadolu Data Center	KKB Varyap Headquarters	KKB R&D Center	
Generator – Diesel	liter	22,862.00	1,740.00	-	24,602.00
Company Transportation Vehicles – Diesel	liter	-	1,173.82	-	1,173.82
Company Transportation Vehicles – Gasoline	liter	-	85,353.78	-	85,353.78
Operational Vehicles – Diesel	liter	1,346.17	-	-	1,346.17
Operational Vehicles - Gasoline	liter	4,946.17	-	-	4,946.17
Fire Extinguishers - CO <sub>2</sub>	kg	8,670.00	8.20	-	8,678.20
Fire Extinguishers - Novec1230	kg	387.94	-	-	387.94
Fire Extinguishers - FM200 (HFC227ea)	kg	-	8.43	0.47	8.90
Refrigerant Gases - R410A	kg	606.00	160.00	-	766.00
Purchased Electricity Consumption	kWh	2,452,223.09	2,322,519.00	65,935.67	4,840,677.76
Renewable Electricity - SPP	kWh	877,503.00	-	-	877,503.00

REDUCING ENVIRONMENTAL FOOTPRINT AND IMPACT MANAGEMENT

SUSTAINABLE  
CARBON MANAGEMENT

Location-Based Carbon Footprint (tCO <sub>2</sub> e)	Istanbul		Ankara	Total
	KKB R&D Center (tCO <sub>2</sub> e)	KKB Varyap Headquarters (tCO <sub>2</sub> e)	KKB Anadolu Data Center (tCO <sub>2</sub> e)	
2020	1,280.00		9,110.00	10,390.00
2021	1,410.00		11,500.00	12,910.00
2022	1,510.00		14,500.00	16,010.00
2023	1,530.00		16,600.00	18,130.00
2024*	30.85	1,687.75	18,324.93	20,043.53

Distribution of 2024 Emission Categories by Facility*		Scope 1 (Direct Emissions)	Scope 2 (Indirect Energy Emissions)	Scope 3** (Other Indirect Emissions)
Istanbul	KKB R&D Center (tCO <sub>2</sub> e)	1.69	29.14	0.02
	KKB Varyap Headquarters (tCO <sub>2</sub> e)	613.16	1,026.55	48.04
Ankara	KKB Anadolu Data Center (tCO <sub>2</sub> e)	1,440.64	1,083.88	15,800.41
Total		2,055.49	2,139.57	15,848.47

\* In 2024, emission calculations for the Istanbul location were separated into Varyap and R&D. In addition to the scope breakdown and location-based measurements, our measurement tool and database have also changed.

\*\* Scope 3 data includes only Categories 3, 4, and 5.

REDUCING ENVIRONMENTAL FOOTPRINT AND IMPACT MANAGEMENT

INNOVATIVE PRACTICES

IN WATER MANAGEMENT

Water Management

Kredi Kayıt Bürosu adopts an environmentally friendly policy in water management based on the principles of efficiency, reduction, and reuse. The water footprint measurement data for 2024 was reported within the scope of the “Corporate Water Footprint Report,” and the blue, green, grey, and embedded water consumption amounts at the Company’s headquarters, R&D center, and Anadolu Data Center locations were calculated in detail.

Various projects have been implemented to reduce operational water consumption. Resource efficiency has been increased through practices such as the recovery of water used in the

adiabatic system at the KKB Anadolu Data Center, rainwater harvesting at the KKB Anadolu Data Center and Varyap Headquarters locations, and the preference for water purifiers instead of bottled water at all locations. Additionally, sensor-equipped faucets and low-flow fixtures are used in the headquarters, rainwater is collected and measured at the Ankara location, and reused for operational activities such as vehicle washing at the Istanbul location.

Long-term water management goals include increasing efficiency projects and raising recovery rates.

Location	Blue Water (m³)	Green Water (m³)	Grey Water (m³)	Embedded Water (m³)	Total (m³)	Distribution (%)
KKB Varyap Headquarters	2,674.2408	79.296	30,473.90679	89,570.7482	122,798.1918	25.78801873
KKB R&D Center	101.2825	0	1,154.149419	545.9556276	1,801.387546	0.37829723
KKB Anadolu Data Center	12,311.078	254.94	5,520.195719	333,497.3254	351,583.5391	73.83368404
Total	15,086.6013	334.236	37,148.25193	423,614.0292	476,183.1184	100.00

Location-Based Water Data			2020	2021	2022	2023	2024*	2024* Total
Total Water Footprint (m³ Water eq)	Ankara	KKB Anadolu Data Center	69,800.00	48,000.00	759,000**	233,000.00	351,583.54	351,583.54
	Istanbul	KKB Varyap Headquarters					122,798.19	
		KKB R&D Center	504,000.000	503,000.000	626,000.000	609,000.000	1,801.39	124,599.58

*\*In 2024, water usage and water footprint data for the Istanbul location were separated for Varyap and the R&D Center. In addition to the scope separation and location-based measurements, our measurement tool and database have also changed.*

*\*\*This increase in the water footprint is due to the use of diesel-powered generators during a three-day power outage in the Ankara OIZ in January.*



## REDUCING ENVIRONMENTAL FOOTPRINT AND IMPACT MANAGEMENT

# WASTE MANAGEMENT WITH A ZERO-WASTE GOAL



# 29.94 TONS

AMOUNT OF WASTE RECYCLED  
IN 2024

### Waste Management

Kredi Kayıt Bürosu addresses waste management with a zero-waste approach, aiming to minimize environmental impacts in its operations. In this context, one of the short-term goals, replacing plastic PET bottle usage with water purifiers, has been completed. In the long term, the development of sustainable products and services is among the priority goals. Solutions such as the Digital Document Center, Electronic Letter of Guarantee, and Greendeks are applications developed within this scope.

In 2024, a total of 19.84 tons of waste was generated at the KKB Anadolu Data Center, consisting of 16.22 tons of non-hazardous and 3.62 tons of hazardous waste. At the Istanbul Varyap Headquarters building, a total of 10.1 tons of non-hazardous waste was disposed of. Waste is managed by being segregated at the locations and disposed of through licensed organizations within the framework of the "Waste Control and Management Procedure."

Waste categories are classified as domestic waste, packaging waste, toner and cartridge waste, batteries and accumulators, contaminated waste, medical waste, waste oils, and WEEE; separate collection, storage, and disposal methods are applied for each. Waste is regularly tracked with the "Waste Tracking List," and National Waste Transport Forms are submitted to the ministry.

As of 2024, at the Ankara location, 6.9 tons of paper-plastic packaging waste were disposed of by Çankaya Katı Atık Geri Dönüşüm,

9.32 tons of scrap material by Genç Metal Geri Dönüşüm, and 3.62 tons of contaminated air filters by Ardam Atık Yönetimi. In Istanbul, 10.1 tons of paper-plastic packaging waste were disposed of through the Ataşehir Municipality.

To reduce the amount of waste, the use of water purifiers in offices, the placement of paper shredders next to printers, and the implementation of internal awareness activities are ensured. Additionally, digitalization projects aimed at reducing paper consumption have been implemented. The "Digital Document Center" has eliminated repetitive document requests from banks' customers, and the "Electronic Letter of Guarantee" has moved all paper-based processes to a digital environment. In 2024, 11 new banks were integrated into the system, bringing the total number of banks on the platform to 51. The e-ledger service also contributes to these processes.

In 2024, 6.9 tons of paper-plastic packaging were disposed of in Ankara, compared to 4.9 tons in 2023. Efforts to measure printer output on a per-employee basis are ongoing, and updates will be made through the new server system.

Waste management policies are accessible to all employees via the Alpha platform. Additionally, employees' active participation in the process is supported through internal training and awareness activities.

In 2023, a total of 22 tons of waste (11.26 tons hazardous, 10.43 tons non-hazardous) was generated in Ankara, while a total of 6 tons of non-hazardous waste was disposed of in Istanbul. In 2024, a total of 19.84 tons of waste was generated at the KKB Anadolu Data Center and 10.1 tons at the Istanbul Varyap Headquarters.







# CLIMATE RISK AND OPPORTUNITY MANAGEMENT

## STRATEGIES THAT TURN CLIMATE RISKS INTO OPPORTUNITIES

### 1. Strategic Approach: Shaping the Future with Climate Resilience

As a leading institution strengthening Türkiye's financial infrastructure, KKB operates with the motivation "Foresee the Future, Create Value," and a mission to contribute to the country's sustainable development and the green transformation of the financial sector. Beyond providing reliable data and innovative risk management solutions to the financial ecosystem, creating social value, fulfilling environmental and social responsibilities at the highest level, and leaving a more resilient economy for future generations are considered fundamental priorities.

In line with this motivation, the deepening impacts of climate change on a global and national scale are evaluated from a strategic perspective and integrated into all corporate governance and business processes. Climate change, with its far-reaching effects, is recognized as a global phenomenon that extends beyond being merely an environmental issue, encompassing systemic risks and transformation-oriented opportunities across a wide spectrum, from economic stability and financial markets to real sectors like agriculture and industry, and supply chain security.

Within the framework of the services it provides to Türkiye's financial and real sectors, KKB is aware of the potential indirect effects of climate change on both its own operations and the financial institutions it serves and their customers. With this understanding, guided by national and international commitments such as the Paris Agreement

goals and Türkiye's 2053 Net Zero Emission target, KKB aims to take a leading role by providing data and analytical infrastructure to the financial sector during the transition to a low-carbon and climate-resilient economy.

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

#### Methodology and Strategic Framework

KKB conducts its climate-related strategic decisions and risk-opportunity analyses based on the strength of its established corporate governance systems and its commitment to serving the goal of a sustainable future. When determining material topics, national priorities, international standards such as the recommendations of the TCFD (Task Force on Climate-related Financial Disclosures), and the expectations of all stakeholders, particularly member financial institutions and regulatory authorities, are taken into account.

The analyses are based on a multi-layered information architecture that includes not only an assessment of past events and current conditions but also forward-looking forecasts and scenarios. The foundation of the analysis consists of internal resources such as established corporate risk management methodologies, strategic objectives, and investment (CAPEX) and operational (OPEX) budgets. Quantitative operational data obtained from all locations, especially the KKB Anadolu Data Center, such as energy consumption, water usage, and power usage effectiveness (PUE), are used directly in identifying physical risks and efficiency opportunities.

To enrich this internal analysis with a forward-looking perspective, internationally recognized external sources are utilized, such as the scenarios from the Intergovernmental Panel on Climate Change (IPCC) that model physical risks and the Network for Greening the Financial System (NGFS) that analyze the dynamics of the transition to a low-carbon economy.





## CLIMATE RISK AND OPPORTUNITY MANAGEMENT

# CLIMATE RISKS AND OPPORTUNITIES FOCUSED ON FOUR MAIN AREAS

### Scope and Areas of Assessment

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

- **Service Portfolio and Innovation Activities:**

Analyzed in terms of transition risks and opportunities, such as changing regulations, customer expectations, and new technologies. This analysis covers both the indirect climate-related risks of existing services and strategies for developing new ESG-based products and services.

- **Technology Infrastructure and Strategic Partnerships:**

The technology infrastructure and data centers that form the backbone of operations are assessed in terms of physical risks that threaten operational continuity, such as extreme weather events, and transition risks, such as energy efficiency regulations.

- **Operational Processes and Corporate Footprint:**

Physical risks (e.g., water shortages, impact of extreme heat on cooling systems) and transition risks (e.g., carbon taxes, rising energy costs), as well as operational efficiency opportunities, are examined through the energy and water consumption and operational carbon footprint of offices and data centers.

- **Served Financial Sector and Real Economy:** The climate-related credit and market risks in the portfolios of member financial institutions are the most significant external factors that directly shape their strategies and new product development processes. The primary opportunity in this area is to provide the financial sector with the data and analytical solutions needed to manage climate risks.

### Time Horizons and Impact Assessment

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

- **Short-Term (0-3 Years):** Covers topics such as annual budgeting, technology roadmaps, and immediate compliance with new regulations.

- **Medium-Term (3-10 Years):** Includes structural policy shifts, such as national carbon pricing, and large-scale technology investments.

- **Long-Term (10+ Years):** Shapes our strategic positioning within the framework of long-term commitments, such as Türkiye's 2053 Net Zero Emission target, and the structural transformations the economy will undergo.

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

### 3. Key Climate-Related Risks and Management Approaches

The table on the following page summarizes the key climate risks we have identified, their potential impacts, and their likelihood of occurrence:





## CLIMATE RISK AND OPPORTUNITY MANAGEMENT

Risk Category	Key Risks	Estimated Impact Magnitude (Financial, Reputational, Service Continuity, Legal)	Estimated Likelihood/Time Horizon	Actions for Risks
Physical Risk (Acute)	<b>Extreme Weather Events and Operational Disruptions:</b> Increased frequency and severity of storms, extreme rainfall, and floods affecting critical infrastructure, particularly KKB's data centers and office buildings.	<b>Medium</b> <b>Financial:</b> Repair/replacement costs; increased insurance premiums; contractual obligations. <b>Reputational:</b> Damage to the image of a reliable service provider. <b>Service Continuity:</b> Unplanned downtime, service interruptions. <b>Legal:</b> Service Level Agreements (SLA) breach risk.	<b>Likelihood:</b> Medium <b>Time Horizon:</b> Short- to Medium-Term	<ul style="list-style-type: none"> <li>• Highly resilient infrastructure investments (Tier IV design-facility and LEED Platinum certified the KKB Anadolu Data Center)</li> <li>• Property insurance investments</li> </ul>
		<b>High</b> <b>Financial:</b> Continuous increase in energy costs; need for CAPEX for efficiency. <b>Reputational:</b> Increased carbon footprint. <b>Service Continuity:</b> Deterioration in PUE metrics, increased probability of failure. <b>Legal:</b> Difficulty in complying with energy efficiency standards.	<b>Likelihood:</b> High <b>Time Horizon:</b> Medium- to Long-Term	<ul style="list-style-type: none"> <li>• Water recovery project for the adiabatic cooling system</li> </ul>
		<b>Low</b> <b>Financial:</b> Increased water bills and the need for efficiency investments. <b>Reputational:</b> Exposure to criticism regarding water stress. <b>Service Continuity:</b> Risk of disruption in cooling operations. <b>Legal:</b> Compliance with water usage quotas requirement.	<b>Likelihood:</b> Low <b>Time Horizon:</b> Medium- to Long-Term	<ul style="list-style-type: none"> <li>• Water recovery project for the adiabatic cooling system</li> <li>• Rainwater harvesting</li> </ul>
Physical Risk (Chronic)	<b>Increase in Average Temperatures and Data Center Efficiency:</b> Rising temperatures due to global warming creating an additional load on data center cooling systems, increasing energy consumption and costs.			
Physical Risk (Chronic)	<b>Water Scarcity and Operational Restrictions:</b> Restrictions on water use resulting from prolonged drought and increased pressure on water resources.			
Transition Risk (Policy and Legal)	<b>Carbon Pricing and Increased Energy Costs:</b> The introduction of a national Emissions Trading System (ETS) or a carbon tax, creating additional costs for Scope 2 emissions.	<b>High</b> <b>Financial:</b> Significant increase in operating expenses (OPEX). <b>Reputational:</b> Perception of being an institution with a high carbon footprint. <b>Service Continuity:</b> Increased cost pressure. <b>Legal:</b> Obligation to comply with new climate policies.	<b>Likelihood:</b> Low <b>Time Horizon:</b> Short- to Medium-Term	<ul style="list-style-type: none"> <li>• Use of clean energy by obtaining I-REC certificates</li> </ul>



## CLIMATE RISK AND OPPORTUNITY MANAGEMENT

Risk Category	Key Risks	Estimated Impact Magnitude (Financial, Reputational, Service Continuity, Legal)	Estimated Likelihood/Time Horizon	Actions for Risks
Transition Risk (Technology)	<b>Delayed Transition to Low-Carbon Technologies:</b> Slow adoption of energy-efficient systems leading to technological obsolescence and loss of competitiveness.	<b>Medium</b> <b>Financial:</b> Stranded asset risk; need for unplanned CAPEX. <b>Reputational:</b> Weakening of the innovative corporate image. <b>Service Continuity:</b> Low operational efficiency, increased maintenance needs. <b>Legal:</b> Risk of failing to meet future standards.	<b>Likelihood:</b> Medium <b>Time Horizon:</b> Short- to Medium-Term	<ul style="list-style-type: none"><li>• SPP investment project</li><li>• Implementation and continuity of Green IT management</li></ul>
Transition Risk (Market/Product)	<b>Obsolescence of Credit Risk Models:</b> The predictive power and market value of traditional credit risk models diminishing due to the economic impacts of climate change.	<b>High</b> <b>Financial:</b> Decreased demand for core products, loss of revenue; high R&D costs. <b>Reputational:</b> Perception of being unable to provide forward-looking risk analysis. <b>Service Continuity:</b> Decline in core service quality. <b>Legal:</b> Risk of regulatory authorities deeming models inadequate.	<b>Likelihood:</b> Low <b>Time Horizon:</b> Medium-Term	<ul style="list-style-type: none"><li>• Significant current and planned R&amp;D investments</li></ul>
Transition Risk (Market)	<b>Changing Customer and Stakeholder Expectations:</b> Increasing stakeholder demand for transparency, a low carbon footprint, and tangible climate actions; failure to meet these expectations leading to customer loss.	<b>High</b> <b>Financial:</b> Customer loss and decreased revenues. <b>Reputational:</b> Perception of lagging behind the industry, erosion of brand value. <b>Service Continuity:</b> Difficulty in meeting increased reporting demands. <b>Legal:</b> Difficulties in complying with reporting standards.	<b>Likelihood:</b> High <b>Time Horizon:</b> Short- to Medium-Term	<ul style="list-style-type: none"><li>• Demonstrating a proactive strategy and approach</li></ul>



## CLIMATE RISK AND OPPORTUNITY MANAGEMENT

# PREPARING FOR THE FINANCIAL IMPACTS OF CLIMATE RISKS

### Detailed Assessment of Risks and Their Financial Impacts

• **Extreme Weather Events and Operational Disruptions:** The most fundamental response to this risk is to invest in infrastructure with the highest level of resilience. The current financial impact of this risk necessitates the allocation of significant financial resources to proactively prevent losses. In this context, critical assets have been secured with comprehensive insurance policies. The Tier IV certification is a result of large-scale design and consulting investments made in the past.

• **Increase in Average Temperatures and Data Center Efficiency:** The current financial impact of this risk is seen as a direct and continuous pressure on operating expenses (OPEX). A significant portion of the data center's total electricity cost is attributable to cooling systems, which are directly related to this risk. To optimize this cost, the necessary investment budget has been allocated for the water recovery project to be commissioned in 2025.

• **Water Scarcity and Operational Constraints:** While the current financial impact of this risk constitutes a relatively modest share of total operating expenses, it has the potential to increase. The planned water recovery project aims to achieve significant savings in current water costs.

• **Carbon Pricing and Increased Energy Costs:** To respond proactively to this potential risk, as a post-reporting period development, I-REC certificates were purchased at the beginning of 2025 in an amount sufficient to cover all Scope 2 emissions resulting from 2024 consumption. This proactive step serves as a precaution against potential future carbon costs.

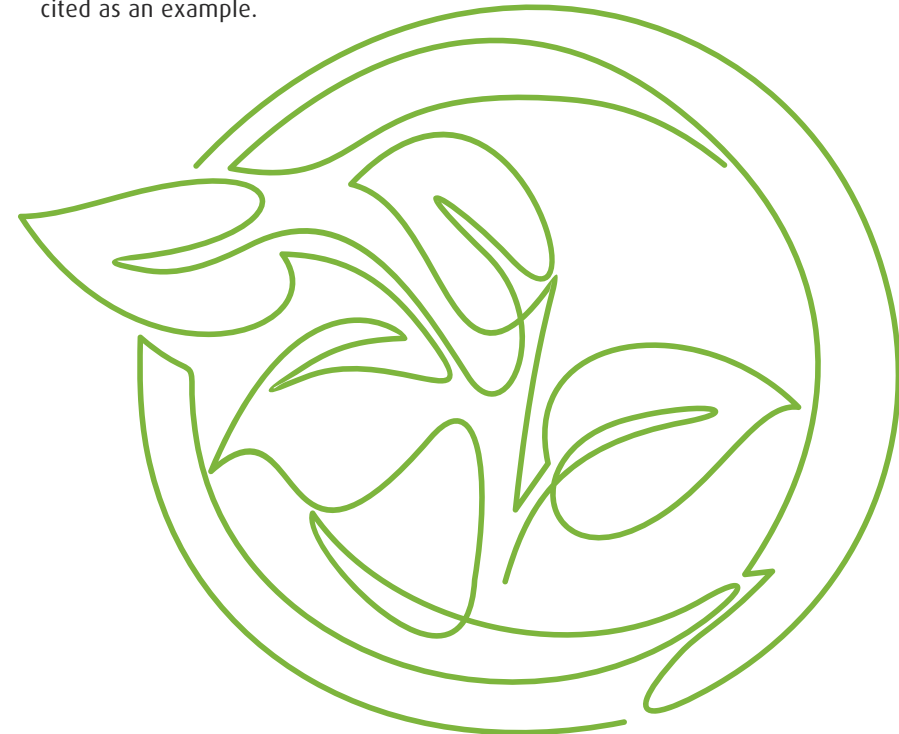
• **Delayed Transition to Low-Carbon Technology:** Staying technologically current is a continuous investment requirement. Accordingly, KKB makes comprehensive and high-volume investment expenditures in IT, R&D, and data center areas each year.

This continuous capital investment forms the basis of our strategy to manage the risk of technological obsolescence.

• **Changing Customer and Stakeholder Expectations:** The financial impact of this risk is twofold. To meet expectations, KKB has allocated the necessary budget for sustainability reporting, consulting, and audit activities for the 2024–2025 period. In the event that expectations are not met, the revenue stream generated from the largest strategic customers, which constitutes a significant portion of the Company's total revenue, indicates the potential at risk.

• **Obsolescence of Credit Risk Models:** The financial impact of this existential risk is the investments made to maintain the predictive power of the models. In 2024, very large-scale R&D and technology-focused project expenditures were made to develop, maintain, and create new projects for the models.

To illustrate the magnitude of revenue that would be directly at risk if the models were to lose market confidence, the Company's core credit risk products, which form its main revenue stream, can be cited as an example.





## CLIMATE RISK AND OPPORTUNITY MANAGEMENT

Opportunity Category	Key Opportunities	Estimated Magnitude of Impact (Financial, Reputational, Service Continuity, Legal)	Estimated Likelihood/Time Horizon	Actions for Opportunities
Resource Efficiency	<b>Reducing Water Footprint and Enhancing Operational Resilience:</b> Reducing environmental impact and increasing resilience to water scarcity by decreasing water consumption and reusing wastewater.	<b>Medium</b> <b>Financial:</b> Direct savings in water costs. <b>Reputational:</b> Image of responsible resource use. <b>Service Continuity:</b> Safeguard against potential water outages. <b>Legal:</b> Proactive compliance with future restrictions.	<b>Likelihood:</b> Medium <b>Time Horizon:</b> Short-Term	<ul style="list-style-type: none"><li>• Water recovery project in the adiabatic cooling system</li><li>• Installation and use of rainwater harvesting systems</li></ul>
Resource Efficiency	<b>Zero Waste and Circular Economy Models:</b> Increasing contribution to the circular economy through the effective management and recycling of electronic waste and other materials.	<b>Medium</b> <b>Financial:</b> Reduction in waste disposal costs. <b>Reputational:</b> Image of environmental leadership. <b>Service Continuity:</b> More efficient operational infrastructure. <b>Legal:</b> Full compliance with waste management regulations.	<b>Likelihood:</b> Medium <b>Time Horizon:</b> Short- to Medium-Term	<ul style="list-style-type: none"><li>• Segregating waste at the source and directing it for recovery</li></ul>
Products and Services	<b>ESG Data Analytics and Next-Generation Reporting Solutions:</b> Developing new products and services in response to the market demand created by new sustainability regulations.	<b>High</b> <b>Financial:</b> Creation of a new revenue stream. <b>Reputational:</b> Technology leadership and visionary brand image. <b>Service Continuity:</b> Making the product portfolio future-proof. <b>Legal:</b> Providing solutions for customers' legal obligations	<b>Likelihood:</b> High <b>Time Horizon:</b> Short- to Medium-Term	<ul style="list-style-type: none"><li>• Development and commercialization of new ESG-focused products and services such as "Greendeks"</li><li>• Integrating data analytics competencies into the field of sustainability</li></ul>
Resilience	<b>Competitive Advantage through Climate-Resilient Infrastructure:</b> Gaining a competitive advantage by maintaining operational continuity even in severe weather conditions, thanks to advanced data center infrastructure.	<b>High</b> <b>Financial:</b> Protection from major financial losses; securing the revenue stream. <b>Reputational:</b> High service reliability and stakeholder trust. <b>Service Continuity:</b> Uninterrupted services. <b>Legal:</b> Full fulfillment of contractual obligations.	<b>Likelihood:</b> Medium-High <b>Time Horizon:</b> Short- to Long-Term	<ul style="list-style-type: none"><li>• Continuing data center infrastructure investments at the highest international standards (Tier IV, LEED Platinum)</li><li>• Managing business continuity plans (ISO 22301) by considering climate scenarios</li></ul>





## CLIMATE RISK AND OPPORTUNITY MANAGEMENT

# A CLIMATE OPPORTUNITIES STRATEGY SHAPING A GREENER FUTURE

#### 4. Key Climate-Related Opportunities and Value Creation Strategy

The fight against climate change also presents significant commercial and operational opportunities.

##### Detailed Assessment of Opportunities and Their Financial Impacts

##### • **Reducing Water Footprint and Enhancing Operational Resilience:**

The value of this opportunity lies in the tangible savings generated by water efficiency projects. Steps such as the existing rainwater harvesting project have resulted in a direct and measurable decrease in operational costs.

##### • **Zero Waste and Circular Economy Models:**

The primary gains in this area are legal compliance and operational efficiency. In 2024, diverting approximately 30 tons of waste from disposal to recovery has resulted in avoiding the associated disposal costs.

##### • **ESG Data Analytics and Next-Generation Reporting Services:**

This opportunity is a strategic investment in the market of the future. To launch this new line of business, a significant investment was made in 2024 by creating a dedicated, competent human resources team for the “Greendeks” product.

##### • **Competitive Advantage through Climate-Resilient Infrastructure:**

The financial value of this opportunity can be expressed as the “hedging value” and “avoided costs” created by the large-scale infrastructure investments that have been realized. The most important indicator is the significant financial value created by the uninterrupted service secured by our resilient infrastructure, which protects the Company’s daily revenue flow.

#### 5. Integrated Risk and Opportunity Management Processes

To manage climate-related risks and opportunities, KKB uses structured processes that are fully integrated into its overall Corporate Risk Management framework.

##### Management of Climate-Related Risks

Our process consists of four main steps: Identification, Assessment, Prioritization, and Monitoring.

- **Identification:** Risks are identified proactively through both internal workshops and the continuous scanning of external sources such as IPCC and NGFS reports, legal developments, and stakeholder expectations.
- **Assessment:** Risks are classified according to their nature (Physical or Transition), likelihood, and time horizon. Quantitative financial modeling is conducted for risks whose potential financial impact may be significant (exceeding the financial materiality threshold set by the Company).

- **Prioritization:** Climate risks are prioritized holistically alongside all other corporate risks, such as cybersecurity or market risk, based on the magnitude of their potential impact and are reported to Senior Management.
- **Monitoring:** Risks are continuously monitored at a strategic level by the Sustainability Committee and at an operational level by the relevant departments through key performance indicators such as energy consumption, PUE ratio, and emissions.

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

##### Management of Climate-Related Opportunities

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

- **Identification:** Regulatory changes, technological developments, and customer dialogues are continuously monitored. NGFS scenarios are used to model the size of market opportunities.

- **Assessment and Prioritization:** Identified opportunities are prioritized by Senior Management after analyzing their potential financial value (ROI) and strategic alignment.
- **Implementation and Monitoring:** Approved opportunities are converted into projects with clear objectives, budgets, and responsible teams. The performance of projects is closely monitored to measure whether the targeted value is being created.

#### 6. Future Action Plan and Strategic Priorities

Developed based on the findings from the analyses, the action plan is structured around three main strategic pillars:

##### 1. Strategic Resilience and Operational Excellence:

- Ensuring the continuity of core services and increasing operational efficiency.
- **Actions:** Maintaining the existing TIER IV and LEED Platinum standards of the KKB Anadolu Data Center, implementing the water recovery project in 2025, and completing feasibility studies for a large-scale SPP project.

##### 2. Future-Proof Product and Service Portfolio:

- Transforming the value proposition into that of a technology company providing climate-enriched risk analytics.
- **Actions:** Launching a comprehensive R&D project to integrate climate-related risks into KKB’s core credit risk models (highest strategic priority), commercializing the Greendeks product, and increasing its market share.

##### 3. Proactive Compliance and Stakeholder Trust:

- Managing legal, political, and reputational risks while responding to stakeholder expectations at the highest level.
- **Actions:** Continuing I-REC purchases that zero out Scope 2 (market-based) emissions to manage potential carbon pricing risk, continuing transparent reporting activities in line with international standards, and leading the industry on international platforms.

All these strategic actions will be financed by the Company’s self-generated cash flows and green financing instruments that are proactively pursued for strategic investments.

GRI CONTENT INDEX



CONTENT INDEX  
ESSENTIALS SERVICE

2025

For the Content Index - Essentials Service, GRI Services reviewed that the GRI Content Index is presented in a manner consistent with GRI Standards reporting requirements and that the information in the index is clearly presented and accessible to stakeholders.

Statement of use	KKB has reported in accordance with the GRI Standards for the period January 1-December 31, 2024.
GRI 1 used	GRI 1: Foundation 2021
Applicable GRI Sector Standard(s)	Since the sector standard for the financial sector has not yet been prepared, no sector standard has been used.

GRI STANDARD	DISCLOSURE	LOCATION AND/OR DIRECT ANSWERS
GRI 2: General Disclosures 2021	GENERAL DISCLOSURES	
	Organization and Reporting Practices	
	2-1 Organization details	About the Report, page 5 About KKB, page 9 Shareholding Structure, page 10
	2-2 Entities included in the organization’s sustainability reporting	About the Report, page 5
	2-3 Reporting period, frequency and contact point	Reporting is done on an annual basis.  About the Report, page 5 Contact: 444 4 552 - info@kkb.com.tr
	2-4 Restatements of information	There is no revised declaration.
	2-5 External assurance	No independent external assurance statement has been obtained for the report.
	Activities and Employees	
	2-6 Activities, value chain and other business relationships	About KKB, page 9 Members, pages 27-28 Our Value-Oriented Products and Services, pages 44-45 Findeks, page 46
	2-7 Employees	Human Resources, pages 54-57
	2-8 Workers who are not employees	Human Resources, pages 54-57
	Governance	
	2-9 Governance structure and composition	Board of Directors and Senior Management, pages 29-32 Corporate Governance and Committees, pages 33-36 Organizational Structure, page 37
	2-10 Nomination and selection of the highest governance body	Sustainability Governance and Organization, page 18 Board of Directors and Senior Management, pages 29-32 Corporate Governance and Committees, pages 33-36
	2-11 Chair of the highest governance body	Board of Directors and Senior Management, pages 29-32
	2-12 Role of the highest governance body in overseeing the management of impacts	Sustainability Governance and Organization, page 18 Corporate Governance and Committees, pages 33-36
	2-13 Delegation of responsibility for managing impacts	Sustainability Governance and Organization, page 18 Corporate Governance and Committees, pages 33-36



## GRI CONTENT INDEX

GRI STANDARD	DISCLOSURE	LOCATION AND/OR DIRECT ANSWERS
GRI 2: General Disclosures 2021	<b>GENERAL DISCLOSURES</b>	
	2-14 Role of the highest governance body in sustainability reporting	Sustainability Governance and Organization, page 18
	2-15 Conflicts of interest	Corporate Governance and Committees, pages 33-36 Regulatory Compliance, Legal Affairs, and Operations, page 40
	2-16 Communication of critical concerns	Sustainability Approach and Strategy, page 19 Stakeholder Map and Stakeholder Relations, page 20 Material Topics and Materiality Matrix, pages 21-22
	2-17 Collective knowledge of the highest governance body	Board of Directors and Senior Management, pages 29-32 Corporate Governance and Committees, pages 33-36
	2-18 Evaluation of the performance of the highest governance body	Board of Directors and Senior Management, pages 29-32 Corporate Governance and Committees, pages 33-36
	2-19 Remuneration policies	Human Resources, pages 54-57
	2-20 Process to determine remuneration	Human Resources, pages 54-57
	2-21 Annual total compensation ratio	Regulatory Compliance, Legal Affairs, and Operations, page 40 Human Resources, pages 54-57
	<b>Strategy, Policies and Practices</b>	
	2-22 Statement on sustainable development strategy	Message from the Chairperson, page 6 Message from the General Manager, page 7 Sustainability Approach and Strategy, page 19 Our Contribution to the Sustainable Development Goals, page 23 Sustainability Targets, pages 24-26
	2-23 Policy commitments	Sustainability Approach and Strategy, page 19 Corporate Governance and Committees, pages 33-36  <u>Certificates</u>
	2-24 Embedding policy commitments	Sustainability Approach and Strategy, page 19 Corporate Governance and Committees, pages 33-36  <u>Certificates</u>
	2-25 Processes to remediate negative impacts	Stakeholder Map and Stakeholder Relations, page 20 Proactive Risk and Crisis Management, pages 38-39 Regulatory Compliance, Legal Affairs, and Operations, page 40 Internal Audit and Internal Control, page 41
	2-26 Mechanisms for seeking advice and raising concerns	Stakeholder Map and Stakeholder Relations, page 20 Proactive Risk and Crisis Management, pages 38-39 Regulatory Compliance, Legal Affairs, and Operations, page 40 Internal Audit and Internal Control, page 41



## GRI CONTENT INDEX

GRI STANDARD	DISCLOSURE	LOCATION AND/OR DIRECT ANSWERS
<b>GENERAL DISCLOSURES</b>		
<b>GRI 2: General Disclosures 2021</b>	2-27 Compliance with laws and regulations	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.  Regulatory Compliance, Legal Affairs, and Operations, page 40
	2-28 Membership associations	Stakeholder Map and Stakeholder Relations, page 20
	<b>Stakeholder Engagement</b>	
	2-29 Approach to stakeholder engagement	Stakeholder Map and Stakeholder Relations, page 20
	2-30 Collective bargaining agreements	There is no collective labor agreement.
<b>MATERIAL TOPICS</b>		
<b>GRI 3: Material Topics 2021</b>	3-1 Process to determine material topics	Material Topics and Materiality Matrix, pages 21-22
	3-2 List of material topics	Material Topics and Materiality Matrix, pages 21-22
	<b>Combating Climate Change and Environmental Adaptation</b>	
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Material Topics and Materiality Matrix, pages 21-22 Combating Climate Change and Environmental Compliance, page 62 Reducing Environmental Footprint and Impact Management, pages 63-66  <u>Environmental Management System</u>
<b>GRI 302: Energy 2016</b>	302-1 Energy consumption within the organization	Reducing Environmental Footprint and Impact Management, pages 63-66
	302-4 Reduction of energy consumption	Reducing Environmental Footprint and Impact Management, pages 63-66
<b>GRI 303: Water and Effluents 2018</b>	303-1 Interactions with water as a shared resource	Reducing Environmental Footprint and Impact Management, pages 63-66
	303-5 Water consumption	Reducing Environmental Footprint and Impact Management, pages 63-66
<b>GRI 305: Emissions 2016</b>	305-1 Direct (Scope 1) GHG emissions	Reducing Environmental Footprint and Impact Management, pages 63-66
	305-2 Energy indirect (Scope 2) GHG emissions	Reducing Environmental Footprint and Impact Management, pages 63-66
	305-3 Other indirect (Scope 3) GHG emissions	Reducing Environmental Footprint and Impact Management, pages 63-66
	306-1 Waste generation and significant waste-related impacts	Reducing Environmental Footprint and Impact Management, pages 63-66
<b>GRI 306: Waste 2020</b>	306-3 Waste generated	Reducing Environmental Footprint and Impact Management, pages 63-66
	306-4 Waste diverted from disposal	Reducing Environmental Footprint and Impact Management, pages 63-66



## GRI CONTENT INDEX

GRI STANDARD	DISCLOSURE	LOCATION AND/OR DIRECT ANSWERS
<b>MATERIAL TOPICS</b>		
	<b>Responsible Procurement and Supply Chain Management</b>	
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Material Topics and Materiality Matrix, pages 21-22 Responsible Procurement and Supply Chain Management, page 53
<b>GRI 308: Supplier Environmental Assessment 2016</b>	308-2 Negative environmental impacts in the supply chain and actions taken	During the reporting period, there were no significant negative environmental impacts in KKB's supply chain network.  Responsible Procurement and Supply Chain Management, page 53
<b>GRI 414: Supplier Social Assessment 2016</b>	414-2 Negative social impacts in the supply chain and actions taken	During the reporting period, there were no significant negative social impacts in KKB's supply chain network.  Responsible Procurement and Supply Chain Management, page 53
	<b>Qualified Workforce and Employment</b>	
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Material Topics and Materiality Matrix, pages 21-22 Human Resources, pages 54-57
<b>GRI 401: Employment 2016</b>	401-1 New employee hires and employee turnover	Sustainability Targets, pages 24-26 Human Resources, pages 54-57
	<b>Occupational Health and Safety</b>	
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Material Topics and Materiality Matrix, pages 21-22 Occupational Health and Safety, page 58
	403-3 Occupational health services	Occupational Health and Safety, page 58
<b>GRI 403: Occupational Health and Safety 2018</b>	403-5 Worker training on occupational health and safety	Occupational Health and Safety, page 58
	403-9 Work-related injuries	Occupational Health and Safety, page 58
	403-10 Work-related ill health	Occupational Health and Safety, page 58
	<b>Talent Management and Training</b>	
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Material Topics and Materiality Matrix, pages 21-22 Human Resources, pages 54-57
<b>GRI 404: Training and Education 2016</b>	404-1 Average hours of training per year per employee	Human Resources, pages 54-57
	404-2 Programs for upgrading employee skills and transition assistance programs	Human Resources, pages 54-57



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GRI STANDARD	DISCLOSURE	LOCATION AND/OR DIRECT ANSWERS
<b>MATERIAL TOPICS</b>		
	<b>Equal Opportunity, Diversity, Inclusion and Gender Equality</b>	
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Material Topics and Materiality Matrix, pages 21-22 Human Resources, pages 54-57
<b>GRI 405: Diversity and Equal Opportunity 2016</b>	405-1 Diversity of governance bodies and employees	Board of Directors and Senior Management, pages 29-32 Human Resources, pages 54-57
	405-2 Ratio of basic salary and remuneration of women to men	There is no gender-based discrimination in employee remuneration at KKB.  Human Resources, pages 54-57
	<b>Business Ethics, Transparency and Legal Compliance</b>	
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Material Topics and Materiality Matrix, pages 21-22 Regulatory Compliance, Legal Affairs, and Operations, page 40 Human Resources, pages 54-57
<b>GRI 205: Anti-corruption 2016</b>	205-3 Confirmed incidents of corruption and actions taken	During the reporting period, there were no cases of corruption at KKB.
<b>GRI 406: Non-discrimination 2016</b>	406-1 Incidents of discrimination and corrective actions taken	During the reporting period, KKB did not experience any cases of discrimination.
	<b>Contribution to Social Welfare</b>	
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Material Topics and Materiality Matrix, pages 21-22 Financial Inclusion and Financial Literacy, page 59 Social Investments, pages 60-61
<b>GRI 413: Local Communities 2016</b>	413-1 Operations with local community engagement, impact assessments, and development programs	Financial Inclusion and Financial Literacy, page 59 Social Investments, pages 60-61
	<b>Data Security and Privacy</b>	
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Material Topics and Materiality Matrix, pages 21-22 Data Security and Privacy, pages 51-52  <u>Information Security Management System</u> <u>Personal Data Security and Privacy Management System</u> <u>Information Security Management System in Cloud Services</u>
<b>GRI 418: Customer Privacy 2016</b>	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	During the reporting period, there were no substantiated complaints regarding breach of customer confidentiality and loss of customer data.  Data Security and Privacy, pages 51-52





## GRI CONTENT INDEX

GRI STANDARD	DISCLOSURE	LOCATION AND/OR DIRECT ANSWERS
<b>MATERIAL TOPICS</b>		
	<b>Sustainable Finance Products and Services</b>	
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Material Topics and Materiality Matrix, pages 21-22 Our Value-Oriented Products and Services, pages 44-45 Findeks, page 46
	<b>Financial Inclusion and Financial Literacy</b>	
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Material Topics and Materiality Matrix, pages 21-22 Financial Inclusion and Financial Literacy, page 59
	<b>Corporate Governance</b>	
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Material Topics and Materiality Matrix, pages 21-22 Corporate Governance and Committees, pages 33-36
	<b>Member, Customer Experience and Satisfaction</b>	
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Material Topics and Materiality Matrix, pages 21-22 Member and Customer Experience and Satisfaction, page 47
	<b>Effective Stakeholder Communication</b>	
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Stakeholder Map and Stakeholder Relations, page 20 Material Topics and Materiality Matrix, pages 21-22
	<b>Employee Engagement, Satisfaction and Rights</b>	
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Material Topics and Materiality Matrix, pages 21-22 Human Resources, pages 54-57
	<b>Digital Transformation and Innovation</b>	
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Material Topics and Materiality Matrix, pages 21-22 Digital Transformation and Innovation, page 48  <u>Information Technologies Service Management System</u>
	<b>Sustainable Operational Performance and Efficiency</b>	
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Material Topics and Materiality Matrix, pages 21-22 Operational Performance, pages 42-43
	<b>Proactive Risk and Crisis Management</b>	
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Material Topics and Materiality Matrix, pages 21-22 Proactive Risk and Crisis Management, pages 38-39  <u>Business Continuity Management System</u>



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