Energy Policy

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Construction and Premises Department

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1. Introduction

1.1 Climate change is one of the dynamics which paves the way for material and significant economic and ecological consequences, and that is why all stakeholders in the society (*governments, regulatory bodies, corporations, consumers and all other stakeholders in the society*) are under obligation to struggle and fight against it.

As a part of struggle against climate change, transition to a low-carbon economy will exert important effects on value chains of many sectors. Large investments are required to be made in many industries for this transition. These investments are concentrated on energy efficiency, renewable energy, micro mobility and circular economy headings, and recent technologic developments in these areas are creating and presenting new opportunities for everyone.

Parallel to these developments, one of the six strategic priorities determined by Garanti BBVA in 2019 was "Sustainability".

Basic goals of Garanti BBVA within the frame of its sustainability strategy are:

- To be the leading bank in sustainability, thereby making positive effects as a bank on its clients and other stakeholders and decision making authorities in the banking industry, and to raise awareness by continuing to effectively use our social role in connection therein; and

- To determine risks and struggle opportunities regarding climate change and integrate the same into our business processes.

This Energy Policy is drafted with reference to Sustainability Policy and the applicable laws and regulations (*Regulation on Increase of Energy Sources and Efficiency in Use of Energy published by the Ministry of Energy and Natural Sources on 25.01.2020*) and national/international standards (*ISO 50001 Energy Management System Principles, etc.*) with the intention of defining methods, powers and responsibilities for conduct of all activities and operations by Garanti BBVA in its campuses covered by energy management system in such manner to further improve the energy performance therein, and taking measures and actions against probable negative effects.

2. Purpose and Scope

Purpose

2.1 Purposes of this policy are:

- To increase significantly and continuously the value contributed by us, as Garanti BBVA, to our clients, shareholders, employees, communities and environment under the ongoing climate change conditions and circumstances; and

- To determine and define general principles and scope of application to be followed in energy management processes applied by Garanti BBVA at its service points covered by energy management system; and

- To ensure that the actions are taken as and when needed for application and enforcement of laws and regulations, national and international standards and systems (*ISO 50001 Energy Management System Principles, Regulation on Increase of Energy Sources and Efficiency in Use of Energy, etc.*) relating to energy management and for compliance with the Bank's sustainability strategies.

Scope

2.2 Service points where energy management system is applied by Garanti BBVA.

3. General Principles

3.1 Garanti BBVA shows regard to the following principles pertaining to energy management system and commits itself to comply, and ensure that all of its employees also comply, with these principles.

- To follow up all applicable laws and regulations, and all efficiency programs developed at national/international platforms, relating to energy management, and to carry out its activities within the frame of corporate standards, and to integrate all applicable standards and rules, especially ISO 50001 Energy Management System, into its processes, and to perform its obligations arising out of applicable laws and regulations and out of the programs participated by it; and

- To determine and categorise energy effects of its activities at its locations covered by this policy, and to assure efficient use of its energy sources, and to continuously endeavour for improvement of its energy performance, and by doing so, to minimize and maintain the energy and environmental effects as far as it is possible; and

- To determine and regularly review objectives and goals for continuous improvement of energy efficiency, and to prevent inefficient use of energy; and

- To support designing activities taking the improvement of energy performance into consideration; and

- To take the energy efficiency criteria into account as far as possible in product, supplier and subcontractor selection, purchase and procurement processes and to include these criteria into purchasing process, and to conduct energy efficiency awareness activities for employees of suppliers providing services in locations and buildings covered by this policy; and

- To follow global, industrial and technologic developments relating to energy efficiency, and to determine new products, processes and standards applicable in locations covered by this policy, and to present such developments and opportunities determined as above to the related stakeholders for their consideration, thereby assuring the use of new implementable products and/or putting into practice said processes and standards; and

- To organise training and internal communication activities aimed at raising the awareness of employees, thereby making contribution to their development; and

- To encourage multifaceted communication in order to understand needs and demands of all stakeholders, and to make contribution to their awareness and development; and

- To open its Energy Policy to access by all stakeholders so as to ensure that it is well understood and implemented; and

- To take the required actions, and supply the required information, personnel and material sources, for energy management system and policy; and

- To ensure that the required sources are supplied by top executive management for performance of activities and operations under Energy Policy; and

- To ensure that top executive management regularly (on yearly basis) reviews and improves the compliance with this policy of all kinds of activities and operations carried out in the buildings covered by this policy.

4. Guidelines

Main Provisions

4.1 Sustainability Policy, Environmental Policy and general principles set forth in article 3.1.

Instructions

4.2 The following instructions and directives are taken into conside8ration if needed under this policy.

- Documents supporting Energy Policy (*ISO 50001 Energy Management System Procedure*) under ISO 50001 Energy Management System / Within the frame of this policy, an Energy Management System Procedure will be prepared and published for locations covered by Energy Management System.
- *Regulation on Increase of Energy Sources and Efficiency in Use of Energy* published by the Ministry of Energy and Natural Sources

Exceptions

4.3 Locations not subject to and not covered by ISO 50001 Energy Management System certification

5. Approval, Review and Audit Clauses

5.1 This policy has been approved by the Board of Directors on 16/11/2023 and put into force on 16/11/2023 as a result of reviews made by the Responsible Banking and Sustainability Committee.

5.2. This Policy is prepared and drafted by Construction and Premises Department Sustainable and Green Office team and Technical Services team within their areas of responsibility.

Governance Model

5.3. Communications with internal and external stakeholders of the Bank, and control model within the processes are named as "governance model". The governance model is structured so as to be traceable at all stages.

5.4. The in-house periodical audits on application of sub-processes within this policy are performed by Construction and Premises Department Sustainable and Green Office team, and in the case of non-conformities detected therein, the required actions are taken directly or indirectly for repair of such non-conformities.

5.5. Construction and Premises Department Sustainable and Green Office team and Technical Services team issue and submit the reports as and when requested by the related authorities in line with the legal obligations and requirements or by independent audit firms for the sake of maintenance of national/international certificates.

5.6. The in-house audit and reporting activities aim to ensure that the processes relating to energy management are structurally supported, and conducted efficiently and reliably, and in conformity with all of the regulatory requirements, and that all of these acts are adequately documented.

5.7. As and when required within the frame of energy policy and secondary processes, communications with the Holding are handled by Construction and Premises Department, which further keeps the related process stakeholders informed about all and any issues which may affect these processes.

5.8. Construction and Premises Department Sustainable and Green Office team conducts review activities for revision of this Policy at least once a year or whenever needed in line with the developments relating thereto. The required or desired changes are made after presentation to the Responsible Banking and Sustainability Committee for consideration and then, to the Board of Directors for approval purposes.

5.9. Construction and Premises Department Sustainable and Green Office team conducts review activities on procedures covered by this Policy at least once a year or whenever needed in line with the developments relating thereto, and the required or desired changes are made on the basis thereof.

5.10. Breach of this policy may result in cancellation/suspension of ISO 50001 Energy Management System Certificate.

Glossary

ISO 50001 Energy Management System: ISO 50001 issued by ISO (International Organisation for Standardization) is an international standard relating to energy management systems aiming to ensure that all institutions and entities establish and implement an energy management system and make it sustainable. ISO 50001 paves the way for adoption of a systematic approach for continuous improvement of energy performance, including, but not limited to, energy efficiency, energy security, energy use and consumption.

Sustainability Policy:

Sustainability Policy is a policy:

- Aiming to formulate present the vision and general principles of Garanti BBVA regarding its sustainability approach in the Bank; and
- Determining and defining the general principles and basic management and control purposes and principles to be followed by the Bank in sustainable development; and
- Designed so as to stand as a reference framework in the course of creation and development of consistent and compliant local or industrial corporate governance policies and systems in the Bank.

Environmental Policy:

Environmental Policy is a policy issued and published in order:

- To increase significantly and continuously the value contributed by us, as Garanti BBVA, to our clients, shareholders, employees, communities and environment under the ongoing climate change conditions and circumstances; and
- To determine and define general principles and scope of application to be followed in environmental management processes applied by Garanti BBVA and its subsidiaries at their service points *(Head Offices, Service Buildings, Branches, Premises and ATMs)*; and
- To ensure that the actions are taken as and when needed for application and enforcement of laws and regulations, national and international standards and systems (*ISO 14001 Environmental Management System Principles, Zero Waste Management System, etc.*) relating to environmental management and for compliance with the Bank's sustainability strategies.

History of Changes

Date	Description of Changes	Changes made by
16/11/2023	▰ First Drafting and Publishing	Construction and Premises Department / Sustainable and Green Office
12/12/2024	▰ Annual review	Construction and Premises Department / Sustainable and Green Office
03/11/2025	▰ Annual review	Construction and Premises Department / Sustainable and Green Office
03/11/2026	▰ Annual review	Construction and Premises Department / Sustainable and Green Office