

Welcome to your CDP Water Security Questionnaire 2021

W0. Introduction

W0.1

(W0.1) Give a general description of and introduction to your organization.

Yapı Kredi at a Glance

Yapı Kredi, established in 1944 as Turkey's first retail focused private bank with a nationwide presence, is the 3rd largest private bank in Turkey with total assets worth TRY 486 billion as of the end of 2020. Yapı Kredi has a strong shareholding structure which ensures sustainable and profitable growth. Yapı Kredi's 9.02% of the shares are directly owned by Koç Holding A.Ş. and 40.95% of the Bank's shares are owned by Koç Financial Services, which is 100% owned by Koç Group. Yapı Kredi has always played a pioneering role in the banking sector and has been sustainably strengthening its market positioning through a customer-centric approach and focus on innovation. Targeting to constantly increase its contribution to the financing of the Turkish economy with its customer-centric approach, Yapı Kredi provides service to its customers with 16,037 employees and 835 branches covering all regions of Turkey. Total cash and non-cash loans of the Bank increased by 20% and reached TL 383 billion in 2020, while its total assets were worth TL 486 billion.

Yapı Kredi delivers its products and services via its 4,535 ATMs, innovative internet banking, leading mobile banking, call center and approximately 788 thousand POS terminals. 97% of the Bank's transactions carried out through non-branch channels as at year-end 2020.

Yapı Kredi is active in retail banking (comprising of card payment systems, individual banking, business banking, private banking and wealth management) as well as corporate, commercial banking and SME banking. The Bank's operations are supported by domestic subsidiaries engaged in asset management, brokerage, leasing and factoring as well as international banking subsidiaries in the Nederland, Malta and Azerbaijan.

Strategy

Yapı Kredi aims to ensure long-term sustainable growth and value creation for all stakeholders, and become the first choice of customers and employees. Yapı Kredi's strategy is being a customer centric commercial bank driven by cutting edge technology and committed workforce, delivering responsible growth. In its activities Yapı Kredi espouses a corporate governance concept built on integrity, responsibility and accountability, and operates on its nine values; sustainability, customer centricity, being united, competitiveness, target orientation, resilience, agility, innovation, and productivity.

Sustainability

Yapı Kredi believes economic sustainability cannot be achieved without social and environmental sustainability, therefore its sustainability approach is integral and comprehensive. In 2017 Yapı Kredi launched its Sustainability Management System (SMS) that allowed the Bank to further integrate sustainability to its business strategy. As part of the SMS Yapı Kredi launched its Environmental Management System and Environmental and Social Risk Assessment (ESRA) System.

While managing its impact on environment and society, Yapı Kredi also aims to contribute to sustainable development of society and transition to a low carbon economy. To that end, Yapı Kredi targets to increase its products and services that drive innovation, sustainability and profit.

Yapı Kredi pursues its activities with the vision of responsible growth that creates value for all the segments, while monitoring implications for all stakeholders. Yapı Kredi regularly engages with its stakeholders to understand their needs and expectations from the Bank. Yapı Kredi's stakeholders are including but not limited to customers, employees, investors, regulators, civil society and academia.

W0.2

(W0.2) State the start and end date of the year for which you are reporting data.

	Start date	End date
Reporting year	January 1, 2020	December 31, 2020

W0.3

(W0.3) Select the countries/areas for which you will be supplying data.

Turkey

W0.4

(W0.4) Select the currency used for all financial information disclosed throughout your response.

TRY

W0.5

(W0.5) Select the option that best describes the reporting boundary for companies, entities, or groups for which water impacts on your business are being reported.

Companies, entities or groups over which operational control is exercised

W0.6

(W0.6) Within this boundary, are there any geographies, facilities, water aspects, or other exclusions from your disclosure?

Yes

W0.6a

(W0.6a) Please report the exclusions.

Exclusion	Please explain
All branches, subsidiaries, credit cards sales offices, regional headquarters, medical centers, warehouse and foreign regions	<p>The organizational boundaries have been defined by using operational control approach. Based on this approach, all branches, subsidiaries, credit cards sales offices, regional headquarters, medical centers, warehouse and foreign regions have been excluded from water inventory, since sufficient and reliable data with regard to these sources could not be collected. Due to this reason, it was preferred to apply the control approach in order to generate accurate results. Within the scope of the organizational boundaries 5 facilities of Yapı Kredi located in Turkey (2 in Istanbul, 3 in Kocaeli) are taken into account, since as explained above only for these 5 facilities reliable data collection could be performed.</p> <p>For the upcoming periods, a data collection system is aimed to be established for obtainment of accurate, consistent, and complete data from these excluded sources as well. The project with regards to the establishment of a new data collection system has been handled in two phases. In 2020 the first phase was completed. In the first phase an internal online portal was developed to enable representatives at each location to log in the water consumption amounts to the online platform on a monthly basis. The representatives at each location need to receive the amount of water consumption from their suppliers in order to be able to log in these values to the online platform. At different locations water is sourced from different suppliers, but all payments are done through automated payments. In the second stage of the project, a system is being developed for the extraction of water consumption amounts through a central system based on the automatic payment data which are made to several different suppliers. After completion of this comprehensive data collection system, the scope of the verification is also aimed to be widened.</p>

W1. Current state

W1.1

(W1.1) Rate the importance (current and future) of water quality and water quantity to the success of your business.

	Direct use importance rating	Indirect use importance rating	Please explain
Sufficient amounts of good quality freshwater available for use	Important	Neutral	<p>As an organization active in banking sector, freshwater is not its primary input as a direct or indirect use. Primary use of fresh water is related to employee consumption, sanitation and landscaping. However, the COVID-19 pandemic demonstrated that good quality fresh water is essential for water sanitation and hygiene (WASH) and thus public health. Therefore, Yapı Kredi determined the importance rating as "important" in terms of direct operations. Access to quality fresh water and protecting employee health and hygiene are very important to Yapı Kredi. In this context, in order to provide its employees with a safe, healthy and sanitary working environment with high standards, in 2020, the Bank set up reverse osmosis drinking water treatment system at the Banking Base and Plaza D Block. This treatment system enabled supply of good quality drinking water which was used for domestic purposes (drinking, cooking, cleaning etc.).</p> <p>As an organization active in the banking sector, freshwater is not Yapı Kredi's primary input as direct or indirect use. Changes in fresh water quality do not have direct impact in Yapı Kredi's business, therefore importance rating for Yapı Kredi in its indirect operations remain "neutral" as stated last year.</p> <p>Due to the rising temperature and decreased rain fall, the water scarcity issue has become an important topic across Turkey. Especially the Marmara region, where the HQ buildings and lots of other properties of Yapı Kredi are located, is a very sensitive area in that sense. Any future water</p>

			<p>scarcity problems which might arise in this region, can have an impact on the business continuity of Yapı Kredi in relation to the need for quality fresh water supply for its employees. In order use the natural resources more effectively and to create an additional solution to the water scarcity problem, it is aimed to extend the implementation of rainwater collection system to several locations in the upcoming reporting periods.</p>
<p>Sufficient amounts of recycled, brackish and/or produced water available for use</p>	<p>Neutral</p>	<p>Neutral</p>	<p>Yapı Kredi does not have any available cycled, brackish and/or produced water for use in place. Although, Yapı Kredi is on feasibility stage with regards to some reuse and recycling projects in its headquarters in the next reporting periods, this amount remains limited and does not constitute an input to the business activities. As part of the aforementioned projects Yapı Kredi started reusing rainwater in one of its facilities' landscape irrigation, which again remains limited. Therefore, since Yapı Kredi is not active in such an industry that requires recycling, producing or using brackish water, the importance rating of recycled, brackish and produced water remains "neutral" for both of its direct and indirect operations.</p> <p>As Yapı Kredi's core business activities will remain the same, the future importance of water use has been designated as "neutral" and no major changes are expected. Future changes in the product portfolio may affect this designation. Additionally, it is estimated that water consumption per employee will increase, since hygiene issue has become a priority during the COVID-19 period. However, the rate of increase in total water consumption is not expected to be high because water efficiency projects, which aim to reduce the total water consumption, are under development. Expected water saving is 30,000 m³ annually. Additionally, at the Banking Base and Plaza D Block facilities, Yapı Kredi plans to implement a grey water treatment system to wastewater collected from sinks, and using treated wastewater</p>

			in the reservoirs. This project is still in progress. In conclusion, Yapı Kredi is aware that efficient use of water is of crucial importance, therefore it continues to design new projects to decrease the water consumption at all of its facilities.
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W1.2

(W1.2) Across all your operations, what proportion of the following water aspects are regularly measured and monitored?

	% of sites/facilities/operations	Please explain
Water withdrawals – total volumes	100%	Yapı Kredi uses surface waters, municipal water and groundwater for the boundaries of the organization. Water consumption data are collected monthly at Yapı Kredi Head Offices and service buildings (Banking Base, Plaza D Block, Bayramoğlu Training Facility, Darıca Archive and Yeniköy Grove). The amount of water consumed in all buildings of Yapı Kredi in Turkey are recorded based on the paid amounts stated on the bills during the year. 2020 water consumption data of the bank has been verified by a third-party verifier. The verification with regards to the Direct Water Footprint Inventory was conducted by RINA Shipping and Certification Limited Company. Yapı Kredi was provided with a declaration of conformity against ISO 14046 by RINA. The term "water consumption" means "water withdrawal", which is defined as "the sum of the withdrawn water". Surface waters, municipal water and groundwater usage are available for organizational boundaries from all sources.
Water withdrawals – volumes by source	100%	All facilities use municipal water and the withdrawal is measured and monitored on a monthly basis. Also well water is used at the Banking Base facility. Two of the facilities within the reporting scope, Plaza D Block and Yeniköy Grove are located in Istanbul. The Istanbul Metropolitan Municipality draws water from the water bodies around Istanbul. There are several dams located in the Marmara basin. It is not possible to determine exactly which dam the water used in these facilities comes from.

		Banking Base, Darıca Archive and Bayramođlu Training Facility are located in Kocaeli. The water supply of these facilities are provided from Kocaeli Metropolitan Municipality Yuvacık Dam, Sapanca Lake, local resources, wells, İhsaniye Avcidere and Ballıkaya dams. This data can be monitored on the website of the municipality. However, it is not possible to determine exactly which dam the water used in these facilities comes from.
Water withdrawals quality	100%	Water withdrawal quality is monitored/measured by the municipality. The municipality carries out a treatment before water is send to the mains. There are some water quality parameters defined in the legislation related to municipality drinking water treatment plants. The municipalities ensure that water sent to the mains comply with these water quality parameters. Additional to the treatment applied by the municipalities, Yapı Kredi implements additional treatment at the Banking Base and Plaza D Block through employing reverse osmosis system in order to further improve the water quality. The aim of these reverse osmosis treatment units is to obtain ready- to- use, good quality fresh water in sufficient quantity. The quality of tap water and water contained in dispensers at both of these facilities is tested monthly against the water quality parameters stated in the local regulation. The test results are monitored regularly and shared with all employees.
Water discharges – total volumes	100%	Wastewater arising from Yapı Kredi facilities is discharged to the sewage and it ends up at the municipal treatment plants. It is neither practical nor possible to track the wastewater discharged from Yapı Kredi’s facilities and to determine at which treatment plant it is treated. 100% of water discharge is monitored monthly from discharge details in municipality water bills.
Water discharges – volumes by destination	100%	Wastewater arising from Yapı Kredi facilities is discharged to the sewage and it ends up at the municipal treatment plants. 100% of wastewater arising from the Head Offices and service buildings is discharged to treatment plants. 100% of total water consumption is discharged to the

		sewage and monitored monthly from municipality water bills.
Water discharges – volumes by treatment method	Not relevant	Wastewater arising from Yapı Kredi facilities is discharged to the sewage and it ends up at the municipal treatment plants. The municipality carries out treatment to fulfill the required wastewater discharge parameters included in the relevant local regulation. For this reason, it is neither practical nor possible to track the wastewater discharged from Yapı Kredi's facilities and to determine at which treatment plant it is treated.
Water discharge quality – by standard effluent parameters	100%	Wastewater arising from Yapı Kredi facilities is discharged to the sewage and it ends up at the municipal treatment plants. The municipality carries out treatment to fulfill the required wastewater discharge parameters included in the relevant local regulation. For this reason, it is neither practical nor possible to track the wastewater discharged from Yapı Kredi's facilities and to determine at which treatment plant it is treated. 100% of wastewater discharged to sewage system is monitored monthly based on its location by the municipality and the effluent is checked against the discharge standards to ensure that the required level of water quality parameters are met.
Water discharge quality – temperature	Not relevant	Wastewater arising from Yapı Kredi facilities is discharged to the sewage and it ends up at the municipal treatment plants. The municipality carries out treatment to fulfill the required wastewater discharge parameters included in the relevant local regulation. Since Yapı Kredi is in the financial services, wastewater discharged to the sewage from its facilities carry domestic wastewater characteristics. Therefore, water discharge quality can not have an adverse effect on the temperature.
Water consumption – total volume	100%	The total water consumption of Yapı Kredi is the sum of consumption from various sources. This data is measured by water bills from respective providers of water. The total volume is monitored and verified on a monthly basis and the scope covers the following facilities: Banking Base,

		Plaza D Block, Bayramoğlu Training Facility, Darıca Archive and Yeniköy Grove.
Water recycled/reused	Less than 1%	Well water and rainwater from Darıca archive building are collected and used for landscape irrigation. Due to the remote working conditions caused by the COVID-19 pandemic, the landscape irrigation was performed through the automated irrigation system which is connected directly to the well. Therefore, well water was used for irrigation purposes. On the other hand, rainwater was collected and stored. The amount of rainwater collected in the storage is nearly 0.3 megaliters/year. Since the collected rainwater could not be used in 2020, the reused amount of water is stated as zero.
The provision of fully-functioning, safely managed WASH services to all workers	100%	Yapı Kredi provides fully functioning, safely managed WASH services to all workers in all operations. Every month hygiene inspections are conducted for drinking water and biannually hygiene checks are conducted for water tankers used for drinking. Hand washing stations are cleaned and reported on daily basis by an outsourced firm, every month water samples are collected from selected hand washing stations to ensure healthy and safe working conditions.

W1.2b

(W1.2b) What are the total volumes of water withdrawn, discharged, and consumed across all your operations, and how do these volumes compare to the previous reporting year?

	Volume (megaliters/year)	Comparison with previous reporting year	Please explain
Total withdrawals	85.99	Much lower	In 2020, the total water withdrawal of Yapı Kredi was 85.99 megaliters/year. The total water withdrawal is equal to the sum of consumption from the following sources: municipal water (77.58 megaliter/year), water supplied via tankers for drinking purposes (0.18 megaliter/year) and water supplied from wells for landscape irrigation (8.24 megaliter/year). $85.99=77.58 + (8.24+0.18)$

			<p>(Withdrawal = Discharge + Consumption). The data related to the amount of water withdrawal was collected from water bills or from third-party water providers. Although rainwater was collected at the Darica Archive facility (nearly 0.3 megaliters/year), the collected rainwater could not be used. Therefore, it is not counted as a part of the total withdrawal. Rainwater is collected in a separate storage and it is pumped to the well water storage. There are two different water meters at the facility. The first water meter is placed at the well water storage, whereas the second water meter is placed at the junction point of the rainwater storage and the well water storage. The amount of rainwater is calculated in which the number measured via the first water meter is subtracted from the number measured via the second water meter. The total water withdrawal was decreased by 33.16% compared to the last year. Yapı Kredi considers a decrease of >10% to be “much lower”.</p> <p>Maintenance and repair activities were performed on the plumbing system to prevent water leaks. The faucets in the washbasins were replaced with photocell faucets. Due to the continued pandemic, a significant reduction is expected in direct water consumption related to operations, including water withdrawals. A permanent hybrid working model has been introduced so that the majority of the workforce will continue to work remotely in the upcoming years. Due to this reason direct (operational) water consumption is expected to decrease compared to previous years.</p>
Total discharges	77.58	Much lower	<p>In 2020, Yapı Kredi discharged 100% of its wastewater to the municipal sewage system. (77.58 megaliters/year). The data related to the amount of discharged water was collected from water bills or from third-party water providers. The total water discharge was decreased by around 36.37% compared to the last year. Yapı Kredi considers a decrease of >10% to be “much lower”. Reason for change compared to the previous reporting period: In 2020, Yapı Kredi made some improvements in its buildings to prevent water leaks and save water. Maintenance and repair activities were performed on the plumbing system to prevent water leaks.</p>

			<p>The faucets in the washbasins were replaced with photocell faucets. Reservoir capacities have been reduced. As the result of these activities the discharged water amount has also been decreased. Due to the continued COVID-19 pandemic, a significant reduction is expected in Yapı Kredi's direct water consumption related to its operations, including water discharge. A permanent hybrid working model has been introduced so that the majority of the workforce will continue to work remotely in the upcoming years. Due to this reason, direct (operational) water consumption is expected to decrease compared to the previous years.</p>
Total consumption	8.42	Much lower	<p>In 2020, the total water consumption of Yapı Kredi was 8.42 megaliters, including water collected from wells for landscape irrigation purposes (8.24 megalitres/year) and water purchased for drinking purposes from third-party tanker water suppliers (0.18 megalitres/year). In 2020, there was no rainwater use. $8.42 = 8.24 + 0.18$ (Withdrawal=Discharge+Consumption). The data related to the amount of total water consumption was collected from water bills or from third-party water providers. The total water consumption decreased by around 24.97% compared to the last year. Yapı Kredi considers a decrease of >10% to be "much lower".</p> <p>Reason for change compared to the previous reporting period: Although water supplied from third parties for drinking purposes was decreased significantly (2020: 0.18 megaliters, 2019: 0.38 megaliters), the amount of water consumed for landscape irrigation has increased. This increase is due to changes in weather conditions that lead to drier seasons and necessitated higher water consumption for irrigation purposes.</p> <p>Due to the continued COVID-19 pandemic, a significant reduction is expected in Yapı Kredi's direct water consumption related to its operations, including water discharge. A permanent hybrid working model has been introduced so that the majority of the workforce will continue to work remotely in the upcoming years. Due to this reason</p>

			direct (operational) water consumption is expected to decrease compared to previous years.
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W1.2d

(W1.2d) Indicate whether water is withdrawn from areas with water stress and provide the proportion.

	Withdrawals are from areas with water stress	% withdrawn from areas with water stress	Comparison with previous reporting year	Identification tool	Please explain
Row 1	Yes	100%	About the same	WRI Aqueduct	Application of the selected tool for evaluation of water stress level: According to the 2020 WRI Aqueduct Water Risk Atlas data, the basic water stress of the water resources used in Yapı Kredi facilities in the Marmara Basin is “4 High (40-80%)” level. As a result of this evaluation, the water stress of Yapı Kredi facilities was categorized as “high risk”. No change was observed in the Marmara Basin in terms of water stress level compared to the previous year. Municipal mains water, well water, rainwater and, if needed, drinking-domestic water provided via tankers are used at Yapı Kredi facilities within the scope of the reporting. Turkish water and sewage administration organizations report the amount of water withdrawn from the dams, dam occupancy rates and water quality annually. This information is monitored to ensure that our facilities have access to water. Although water withdrawal it is not the primary input in Yapı Kredi’s business and operational activities, since

				<p>it is a financial institution, Yapı Kredi regularly monitors the amount of water consumed through the invoices (submitted by municipalities) and takes measures to reduce water consumption, as per compliance with the Bank's environmental strategies. The measures related to the reduction of water consumption include:</p> <ul style="list-style-type: none"> • Mandatory trainings provided to the subcontractors working at Yapı Kredi facilities (10.5 hours of environmental training to 35 subcontractors within the scope of ISO 14001 Environmental Management System) • Capacity building and awareness raising activities designed for employees (training on water and sanitation related issues, regular internal communication activities to raise awareness on lifestyle changes to incentivize behavioral change towards water efficiency) • 770 hours of environmental training was provided to 1,856 Yapı Kredi employees. Limited assurance by an independent audit firm (PwC) is obtained to verify the total number of employees who participated the environmental training within the reporting period.
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W1.2h

(W1.2h) Provide total water withdrawal data by source.

	Relevance	Volume (megaliters/year)	Comparison with previous	Please explain
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			reporting year	
Fresh surface water, including rainwater, water from wetlands, rivers, and lakes	Relevant	0	Much lower	<p>Under normal conditions well water and rainwater from Darıca archive building are collected and used for landscape irrigation. The landscape irrigation was performed through the automated irrigation system which is connected directly to the well. On the other hand, rainwater was collected, stored but not used.</p> <p>Therefore, the reused amount of water is stated as zero and it is not counted as a part of the total withdrawal. The reason for this is explained in W1.2b. The rainwater use is decreased by 100% compared to the last year, since the collected rain water could not be used. Yapı Kredi considers a decrease of >10% to be much lower. The amount of collected rainwater depends largely on rainfall levels. As temperatures increase due to the climate change, the amount of annual precipitation decreases. In this context, it is predicted that the amount of collected rainwater might decrease due to the decrease in the amount of precipitation in the coming years.</p>
Brackish surface water/Seawater	Not relevant			Yapı Kredi does not use brackish surface water/seawater. It is not expected to experience any change in the source of water withdrawal, since Yapı Kredi

				has access to municipal water sources in its facilities. Groundwater is only used for irrigation and there is no need for brackish surface water/seawater.
Groundwater – renewable	Relevant	8.24	Much higher	<p>The groundwater is used for landscape irrigation. In the Banking Base facility, water drawn from wells for landscape irrigation corresponds to 8.24 megaliters.</p> <p>Reason for change compared to the previous reporting period: The renewable groundwater use is increased 24.97% compared to the last year. Yapı Kredi considers an increase of >10% to be "much higher". The amount of renewable groundwater consumed for landscape irrigation has increased. This increase is due to changes in weather conditions that lead to drier seasons and necessitated higher water consumption for irrigation purposes.</p> <p>Volume of water withdrawal from renewable groundwater is expected to increase as the climate becomes drier each year. While the temperature is increased due to the climate change, annual precipitation amount decreases.</p> <p>Therefore, the need for the use of well water might increase.</p>
Groundwater – non-renewable	Not relevant			Yapı Kredi does not use non-renewable ground well water. Yapı Kredi does not expect any change in water

				withdrawal source, since it has access to municipal water source in its facilities. Yapı Kredi uses groundwater only for irrigation purposes and there is no need for non-renewable groundwater.
Produced/Entrained water	Not relevant			Yapı Kredi does not use produced water/entrained water. Yapı Kredi does not expect any change in water withdrawal source, since Yapı Kredi has access to municipal water source in its facilities. Yapı Kredi uses groundwater only for irrigation purposes and there is no need for produced/entrained water.
Third party sources	Relevant	77.75	Much lower	In its facilities, Yapı Kredi withdraws water from municipal and tanker water suppliers. Total water supplied corresponds to 77.58 megaliters. Supplied water is used for domestic purposes. Water supplied from the tanker water suppliers (0.18 megaliters) is utilized for drinking and food/tea making. Water consumption is calculated based on the invoices provided by the suppliers. Supplied water is decreased by 36.42% compared to the last year. Yapı Kredi considers a decrease of >10% to be “much lower”. Water supplied from the municipal sources is lower due the improvements made to prevent water leaks through maintenance and repair activities on the plumbing system. The

				anticipated future trends for these volumes is explained in W1.2b.
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W1.2i

(W1.2i) Provide total water discharge data by destination.

	Relevance	Volume (megaliters/year)	Comparison with previous reporting year	Please explain
Fresh surface water	Not relevant			Water utilized at Yapı Kredi facilities is not discharged to fresh surface water. Wastewater arising from each facility is discharged to the municipal sewage system.
Brackish surface water/seawater	Not relevant			Water utilized at Yapı Kredi facilities is not discharged to brackish surface water/sea water. Wastewater arising from each facility is discharged to the municipal sewage system.
Groundwater	Not relevant			Water utilized at Yapı Kredi facilities is not discharged to groundwater. Wastewater arising from each facility is discharged to the municipal sewage system.
Third-party destinations	Relevant	77.58	Much lower	Relevance: Wastewater arising from each Yapı Kredi facility is discharged to the municipal sewage system. Change from the previous year: In 2020 Yapı Kredi made some improvements to avoid water leakages and save water in its buildings, hence decrease its water discharge. Maintenance and repair activities were performed on the plumbing system to prevent water leaks. The faucets in the washbasins were replaced with photocell faucets. Reservoir capacities have been reduced. Discharge to third party

				destinations decreased by 36.37% compared to the last reporting year. Yapı Kredi considers a decrease of >10% to be “much lower”.
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W1.4

(W1.4) Do you engage with your value chain on water-related issues?

Yes, our suppliers

W1.4a

(W1.4a) What proportion of suppliers do you request to report on their water use, risks and/or management information and what proportion of your procurement spend does this represent?

Row 1

% of suppliers by number

1-25

% of total procurement spend

1-25

Rationale for this coverage

Selection criteria: Within the scope the activities conducted by Yapı Kredi in the field of sustainability, the bank obliges compliance with its Environmental, Occupational Health and Safety Specification added to the selected contracts signed with its suppliers. This specification includes also a specific clause in which suppliers are mandated to comply with the requirements of ISO 14001. According to the nature of the services procured from its suppliers, Yapı Kredi determines whether to include the Environmental, Occupational Health and Safety Specification in the contract or not. Especially for the maintenance/repair/refurbishment service category this specification is added to the contracts. There has been an ongoing study on this topic and in the near future it is planned to establish a screening system for suppliers and select the suppliers through questioning the existence of such certifications (ISO 14001) etc.

Incentive to report: Companies are ranked based on their audit performance and maintain their business relation with Yapı Kredi for the following years. This encourages suppliers to report on their water use as an incentive.

Impact of the engagement and measures of success

Information requested from suppliers: Yapı Kredi provides mandatory trainings to its subcontractors and requests them to provide data on their water consumption trends. Accordingly, Yapı Kredi sets water efficiency related targets for them.

How the information is used within the company: Companies are ranked based on their audit performance and accordingly maintain their business relation with Yapı Kredi for the following years.

Measure of success: Yapı Kredi measures its engagement success based on the outcomes of the audits and targets set.

Comment

There is an ongoing study to establish a screening system for enabling assessment and selection of suppliers. This system is planned to include various sustainability criteria including also water related topics, so that all suppliers of Yapı Kredi are covered by this system.

W1.4b

(W1.4b) Provide details of any other water-related supplier engagement activity.

Type of engagement

Innovation & collaboration

Details of engagement

Educate suppliers about water stewardship and collaboration

% of suppliers by number

1-25

% of total procurement spend

1-25

Rationale for the coverage of your engagement

Yapı Kredi engages its suppliers and subcontractors at different levels. Subcontractors are suppliers who work within Yapı Kredi's premises and are subject to a different contract in that regard. In line with their contracts, subcontractors are further required to comply with Yapı Kredi's water management policies. Because these specific subcontractors are located within Yapı Kredi's premises, they can be monitored more effectively. On the other hand, since suppliers (other than subcontractors) are not located within Yapı Kredi's premises, monitoring their water performance is not easy and requires additional effort and resources.

Impact of the engagement and measures of success

Beneficial outcomes of the engagement activity: Yapı Kredi provided 10.5 hours of environmental training to 35 subcontractors within the scope of ISO 14001 Environmental Management System. In 2020, due to the effect of the pandemic, the number of subcontractors working at Yapı Kredi facilities was decreased significantly

resulting in a reduced number of engaged subcontractor employees and reduced hours of training compared to 2019. Yapı Kredi aims to raise awareness through training and thus reduce unnecessary water consumption.

Success of supplier engagement: The expected impact of engagement is changing supplier behaviour and raising awareness. The measure of success for the training is that the training is completed by all invited parties and the ISO 14001 certification is received by the relevant subcontractor company. Yapı Kredi measures success by monitoring subcontractors' water consumption trends via hydrometer values.

Comment

W2. Business impacts

W2.1

(W2.1) Has your organization experienced any detrimental water-related impacts?

Yes

W2.1a

(W2.1a) Describe the water-related detrimental impacts experienced by your organization, your response, and the total financial impact.

Country/Area & River basin

Turkey

Other, please specify

Marmara Basin

Type of impact driver & Primary impact driver

Physical

Inadequate infrastructure

Primary impact

Increased operating costs

Description of impact

14 locations of Yapı Kredi (13 branches and Yeniköy Grove) flooded because of heavy rainfall in İstanbul.

Company specific description for the primary impact: Yapı Kredi's operating costs increased due to the following costs which were identified as additional costs: The basement and ground floors of the mentioned locations were flooded. Costs were arisen due to drainage of water from flooded areas and cleaning purposes of flooded areas.

Scale of the impact: Business continuity was not affected due to the flood, which means

that there was no impact on Yapı Kredi's operational activities. There was no need to close the affected branches, so they continued their operations uninterruptedly.

Primary response

Improve maintenance of infrastructure

Total financial impact

14,383.44

Description of response

Total financial impact calculation: The total cost of the damage was TRY 14,383.44 and was paid by the insurance company.

Response strategy: Yapı Kredi strengthened its maintenance activities in order to isolate areas with risk of flooding. As a result of this, the operating costs of the damaged branches increased in 2020.

Country/Area & River basin

Turkey

Other, please specify

Marmara Basin

Type of impact driver & Primary impact driver

Physical

Inadequate infrastructure

Primary impact

Increased operating costs

Description of impact

In 2020, the warehouse of the meeting room flooded because of heavy rain at Yeniköy Grove facility.

Company specific description for the primary impact: Yapı Kredi's operating costs increased due to the costs associated with the drainage of water from the flooded area (the warehouse) and the damage repair costs.

Scale of the impact: The scale is not substantive if only the reporting scope is taken into consideration. The financial impact on the operating cost is considered as low and the business continuity was not affected, which means that there was no impact on Yapı Kredi's operational activities. There was no need to close the affected branches, so they continued their operations uninterruptedly.

Primary response

Improve maintenance of infrastructure

Total financial impact

35,174.75

Description of response

Total financial impact calculation: The total cost of the damage was TRY 35,174.75 and the insurance remained under the flood exemption. 7,452.77 TL of the incurred cost was paid by the insurance, 27,721.98 TL was paid by Yapı Kredi as the insurance remained under the flood exemption.

Response strategy: Yapı Kredi strengthened its maintenance activities to isolate areas at risk of flooding. As a result, the relevant operating costs of the damaged locations (13 branches and Yeniköy Grove) were increased in 2020.

W2.2

(W2.2) In the reporting year, was your organization subject to any fines, enforcement orders, and/or other penalties for water-related regulatory violations?

No

W3. Procedures

W3.3

(W3.3) Does your organization undertake a water-related risk assessment?

Yes, water-related risks are assessed

W3.3a

(W3.3a) Select the options that best describe your procedures for identifying and assessing water-related risks.

Direct operations

Coverage

Full

Risk assessment procedure

Water risks are assessed in an environmental risk assessment

Frequency of assessment

Annually

How far into the future are risks considered?

1 to 3 years

Type of tools and methods used

Tools on the market

Other

Tools and methods used

WRI Aqueduct

Internal company methods

National-specific tools or standards

Comment

Risks originated from the internal environmental effects of the Bank arising from operational consumption are followed by "FR-1 planning risk and opportunity determination form". Environmental risks are determined by the Matrix Method (L-Type Matrix) method.

Supply chain

Coverage

Partial

Risk assessment procedure

Water risks are assessed in an environmental risk assessment

Frequency of assessment

Annually

How far into the future are risks considered?

1 to 3 years

Type of tools and methods used

Tools on the market
Other

Tools and methods used

Internal company methods
National-specific tools or standards

Comment

Subcontractors conducting their operations at the facilities of the Bank are monitored against their compliance with the "FR-1 planning risk and opportunity determination form", which is based on the internal environmental effects of the Yapı Kredi's subcontractors' operational activities." Environmental risks are determined by the Matrix Method (L-Type Matrix) method.

Other stages of the value chain

Coverage

Partial

Risk assessment procedure

Water risks are assessed in an environmental risk assessment

Frequency of assessment

Annually

How far into the future are risks considered?

More than 6 years

Type of tools and methods used

International methodologies
Other

Tools and methods used

Internal company methods
Other, please specify
IFC Environmental and Social Performance Standards

Comment

Yapı Kredi's Environmental and Social Risk Management System team evaluates the environmental and social risks which might arise due to the projects financed by Yapı Kredi on an annual basis. The environmental and social risk assessment system is in line with the IFC Performance Standards and the Equator Principles.

W3.3b

(W3.3b) Which of the following contextual issues are considered in your organization's water-related risk assessments?

	Relevance & inclusion	Please explain
Water availability at a basin/catchment level	Relevant, always included	Water availability at a basin/catchment level is important for Yapı Kredi in terms of its lending activities. All loan requests are subject to the Environmental and Social (E&S) Policy in addition to being checked for compliance with the Credit Policies and the Exclusion List included in the E&S Policy. Loan requests that are above the determined limit (USD 10,000 - 74 million TL - calculated by using the exchange rate as of 31 December 2020) are assessed against the Environmental and Social Risk Assessment (ESRA) Model. ESRA Model is compliant with IFC Performance Standards (IFC PS) and Equator Principles. ESRA categorizes risks under three groups: high, moderate, and low risk. The distribution of the projects evaluated within the scope of the ESRA System in 2020 by categories is as follows: High risk: 19 projects, Medium risk: 5 projects, Low risk: 6 projects. Water availability at a basin/catchment level is considered within this model. When an investment has a potential in terms of significant water consumption, measures avoiding or reducing water usage have to be taken according to ESRA system's requirements so that this project's water consumption does not generate an adverse impact on the environment. These measures include, but are not limited to, the use of additional technically feasible water conservation measures within the client's operations, the use of alternative water supplies, water consumption offsets to reduce total demand

		<p>for water resources within the available supply, and evaluation of alternative project locations. High and medium-risk projects: Throughout the investment, the investor is required to ensure successful implementation of environmental and social measures as defined and approved in the Environmental Impact Assessment (EIA) Report and the Project Presentation File, and prove consistent implementation of such measures through supporting documents. An external and independent Environmental and Social Expert shall prepare an E&S Status Assessment/Action Plan and Monitoring Plan that comply with the IFC PS to ensure that all E&S aspects of the investment are monitored and reported regularly. The investment shall be monitored via field visits at least once a year by an external and independent E&S Consultant/Expert. After completion, the investment is monitored in the operating phase via one site visit. The loan contract shall include a provision that obligates the investor to comply with the Action and Monitoring plans.</p>
<p>Water quality at a basin/catchment level</p>	<p>Relevant, always included</p>	<p>Relevance to the company (Direct Operations – All locations within the reporting scope as defined in): Access to clean water and protecting water quality is crucial for Yapı Kredi in order to preserve public health and hygiene. Access to quality fresh water and protecting employee health and hygiene are very important to Yapı Kredi. In this context, in order to provide its employees with a safe, healthy and sanitary working environment with high standards, in 2020, the Bank set up a reverse osmosis drinking water treatment system at the Banking Base and Plaza D Block.</p> <p>Explanation of the Assessment: Yapı Kredi assesses the quality of water from the basin using nationally accredited laboratories from Turkish Accreditation Agency, because such laboratories are highly reliable. Yapı Kredi considered water withdrawals and discharges while assessing water quality at a basin/catchment level.</p> <p>Assessment Tool: Water quality reports from Turkish Accreditation Agency</p> <p>Relevance to the company (Indirect Operations): Since Yapı Kredi gives environmental and social matters great importance, it requires all projects it finances to comply with relevant legal requirements as well as standards beyond</p>

		<p>the requirements determined by its policies. Yapı Kredi assesses project activities it is going to finance based on its Environmental and Social Risk Assessment (ESRA) System, which takes into account water quality at a basin/catchment level.</p> <p>Explanation of the Assessment: Yapı Kredi assess the status of the project to identify water quality using information such as frequency of monitoring pollutants; procedures in place to control / minimize the intensity and mass flow of releases; applicable mitigation measures according to national regulations and IFC Performance Standards; and potential legal liabilities.</p> <p>Assessment Tool: Yapı Kredi's Environmental and Social Risk Assessment (ESRA) System, Results from Nationally Accredited Laboratories</p>
Stakeholder conflicts concerning water resources at a basin/catchment level	Relevant, always included	<p>Relevance to the Company: Since Yapı Kredi gives environmental and social matters great importance, it requires all projects it finances to comply with relevant legal requirements as well as standards beyond the requirements determined by its policies. Yapı Kredi assesses project activities it is going to finance based on its Environmental and Social Risk Assessment (ESRA) System, which takes into account potential stakeholder conflicts concerning water resources at a basin/catchment level.</p> <p>Explanation of the Assessment: Through the use of Yapı Kredi's ESRA System, projects are followed according to national laws thereby Environmental Impact Assessment (EIA) including public participation meetings. In addition, stakeholder engagement plans (SEP) are submitted to project owners when required to avoid relevant stakeholder conflicts regarding water resources. Furthermore, for better monitoring, Yapı Kredi interviews with local authorities during site visits. Yapı Kredi demands the projects owners of high/medium-risk projects to develop/implement grievance mechanisms.</p> <p>Assessment Tool: Yapı Kredi's Environmental and Social Risk Assessment (ESRA) System.</p>
Implications of water on your key	Not relevant, explanation provided	<p>Since Yapı Kredi conducts its activities in the banking sector, there are no physical commodities / raw materials involved in its day-to-day business. Hence, direct</p>

commodities/raw materials		implications of water on commodities / raw materials is not applicable for Yapı Kredi. Also, Yapı Kredi does not anticipate this issue to become relevant in the future.
Water-related regulatory frameworks	Relevant, always included	<p>Relevance to the company: Within the bank, current national-specific standards and regulatory frameworks and any changes in water related regulations are closely monitored to avoid any non-compliance.</p> <p>Explanation of the Assessment: Yapı Kredi uses an internal risk management system that covers risks stemming from regulatory frameworks, including environmental regulatory frameworks. The risk management system is regularly updated in line with national regulations.</p> <p>Assessment Tool: Internal Risk Assessment Method and Compliance team's know-how.</p>
Status of ecosystems and habitats	Relevant, always included	<p>Relevance to the company: Yapı Kredi takes into consideration the impact of its lending activities on the status of ecosystems and habitats.</p> <p>Explanation of the Assessment: While conducting its ESRA process in line with IFC Standards, Yapı Kredi takes into account environmental issues, including the linkage between conservation of biodiversity, fish passes and minimum flow at hydroelectric power plants (HEPP) and water basin management policy issues (such as the RAMSAR Convention).</p> <p>Assessment Tool: Yapı Kredi's Environmental and Social Risk Assessment (ESRA) System.</p>
Access to fully-functioning, safely managed WASH services for all employees	Relevant, always included	<p>Relevance to the company: Yapı Kredi regards its human capital as the most valuable asset in all its activities. Therefore, ensuring safely managed WASH services for its employees is a priority for Yapı Kredi.</p> <p>Explanation of the Assessment: Yapı Kredi carries out internal occupational hygiene audits at all of its facilities with company specific tools and methods monthly and biannually. This ensures that all of its facilities provide fully functioning WASH services to all workers. Samples are collected from selected lavatories to detect the water quality. Additionally, reverse osmosis treatment systems are established at the Banking Base and Plaza D Block facilities to provide employees with high quality water. Water treated through reverse osmosis is monitored</p>

		monthly for compliance with the water quality parameters specified in the local regulation. Analysis reports are shared with all employees. Assessment Tool: Company Specific Tools and Audits
Other contextual issues, please specify	Not considered	There are no other contextual issues.

W3.3c

(W3.3c) Which of the following stakeholders are considered in your organization's water-related risk assessments?

	Relevance & inclusion	Please explain
Customers	Relevant, always included	<p>Explanation of inclusion: Yapı Kredi takes its customers into account within the scope of water-related risk assessments, since customers constitute one of its key stakeholders and Yapı Kredi's most important water related impact is generated through its lending activities.</p> <p>Method of Engagement: Yapı Kredi executes an assessment of water related issues and risks within the ESRA System for investment and project financing loan requests with an investment amount of USD 10 million (74 million TL - calculated by using the exchange rate as of 31 December 2020) and above, that passed the initial screening. Yapı Kredi Bank's ESRA system was updated in 2020 to comply with the Equator Principles. With this update, SEP is required to be prepared for the projects that have applied to receive for loans and the project stakeholders have to be well defined within the scope of this SEP.</p> <p>As a consequence of the ESRA System's implementation, Yapı Kredi puts in place certain environmental and social requirements for the customers to fulfill. If water related risks are detected in an investment or project, investors are requested to comply with respective environmental requirements to manage the water related risks. Moreover, Yapı Kredi also carries materiality assessment studies on sustainability topics with its customers.</p>
Employees	Relevant, always included	Explanation of inclusion: Yapı Kredi takes its employees into account within the scope of water-related risk assessments, since employees constitute one of its key stakeholders. It is an important issue and a concern to provide good quality and

		<p>quantity water to the employees. Insufficient access to water is among the important potential effects. Lack of water will have negative impacts on public health and sanitation. Employees are the main water consumers within the bank, therefore they constitute one of the important stakeholders in terms of efforts for minimizing water consumption.</p> <p>Method of Engagement: Yapı Kredi gives priority to build capacity and raise awareness on sustainability issues including water through its employees. Yapı Kredi conducts training on water and sanitation related issues and regular internal communication activities are carried out to raise awareness on lifestyle changes to incentivize behavioral change towards water efficiency.</p>
Investors	Relevant, always included	<p>Explanation of inclusion: Investors constitute one of Yapı Kredi's main stakeholders since Yapı Kredi is a publicly traded company.</p> <p>Method of Engagement: Yapı Kredi responds to CDP Water Program, publishes an annual Integrated Report and implements its Environmental Management System to provide a better understanding of its water management to the investors. Since 2018, Yapı Kredi has been reporting its water security and management strategy, performance and targets within the scope of CDP Water Program. Having received CDP Turkey 2019 Water Leader award, the Bank was assigned A- (Leadership) score also in the CDP 2020 Water Program, and thus remained within the leadership category. Hence, Yapı Kredi has been the only firm from the Turkish financial services sector to be included in the leadership category under the CDP Water Program.</p>
Local communities	Relevant, always included	<p>Explanation of inclusion: Yapı Kredi evaluates its customers' activities in terms of having negative impacts on local communities and implements a follow up procedure whether its customer (the project owner) established a community engagement process for affected communities.</p> <p>Method of Engagement: Yapı Kredi's ESRA System is based on IFC Environmental and Social Performance Standards taking into account local communities' environmental and social expectations. Furthermore, for all loans monitored within the scope of the ESRA System, it is mandatory to comply with the Environmental Impact Assessment (EIA) Regulation which requires an inclusive local community participation. Additionally, Stakeholder Engagement Plan is also requested</p>

		from the high/medium-risk category project owners to ensure the public involvement.
NGOs	Relevant, always included	<p>Explanation of inclusion: NGOs constitute one of Yapı Kredi's main stakeholders because Yapı Kredi gives great importance to the development of society and is committed to conduct activities to contribute to this development. Yapı Kredi gives utmost importance to ensure that Yapı Kredi's business activities do not cause any harm for the environment and the society.</p> <p>Method of Engagement: Yapı Kredi is in constant communication and collaboration with NGOs that address water related concerns.</p> <p>Yapı Kredi collaborated with WWF-Turkey, Turkish Marine Environment Protection Association (TURMEPA), Global Compact Network Turkey and UNEP FI in 2020 in different kinds of sustainability related projects.</p>
Other water users at a basin/catchment level	Relevant, always included	<p>Explanation of inclusion: Yapı Kredi further seeks to ensure that other water users at a basin/catchment level are not negatively impacted as a result of Yapı Kredi's business activities.</p> <p>Method of Engagement: With Environmental Impact Assessment (EIA) Regulation and Yapı Kredi's Environmental and Social Risk Assessment System in line with IFC Environmental and Social Standards, Yapı Kredi makes sure that the projects that it finances are not harmful to other water basins and other water users in that basin. Yapı Kredi's ESRA system was updated in 2020 according to the Equator Principles. With this update, a sector-based approach – including energy sector- has been developed for the investments with financing requests. With this approach, cumulative assessments for the energy projects are also questioned.</p> <p>In addition, EIA Regulation might require stakeholder meetings with the customers and Yapı Kredi might require further stakeholder engagement plans from its customers.</p>
Regulators	Relevant, always included	<p>Explanation of inclusion: In order to be better prepared for potential implications due to regulatory changes, Yapı Kredi considers regulators in its risk assessment processes. Through these assessments, Yapı Kredi ensures full regulatory compliance of its activities.</p> <p>Method of engagement: Through its Compliance Office, Yapı</p>

		<p>Kredi follows environmental regulations and legislation closely, attends seminars and workshops organized by regulatory bodies. Yapı Kredi engages also with public authorities via Turkish Industry and Business Association (TUSIAD) where businesses present suggestions on the current and upcoming regulations including regulations that cover water related issues. Yapı Kredi is an active member of TUSIAD in Environment and Climate Change Working Group.</p>
River basin management authorities	Relevant, always included	<p>Explanation of inclusion: River basin management authorities are taken into account by Yapı Kredi in order to fully comply with environmental regulatory requirements and avoid any future conflicts.</p> <p>Method of Engagement: Yapı Kredi takes river basin management authorities into account within the scope of its ESRA processes in relation with its lending activities and further communicates with these authorities in case of any issues raised.</p>
Statutory special interest groups at a local level	Not relevant, explanation provided	<p>Statutory special interest groups are not considered within the risk assessment process, since Yapı Kredi does not identify any statutory special interest groups at a local level. Yapı Kredi does not expect statutory special interest groups at a local level to be relevant in the future.</p>
Suppliers	Relevant, always included	<p>Explanation of inclusion: Yapı Kredi gives great importance to risk management associated with its suppliers, since the value chain is also crucial for the banking sector in terms of its environmental risks including the ones related to water issues.</p> <p>Method of Engagement: As part of Yapı Kredi's sustainability values, Yapı Kredi demands compliance with the requirements of ISO 14001 in supplier contracts. Yapı Kredi published its Responsible Procurement Policy in 2016 to spread its values and principles to its value chain. This policy strives to reduce environmental and social impacts of purchased products and services throughout the life cycle. Furthermore, Yapı Kredi provides training to its subcontractors on its water management policies.</p>
Water utilities at a local level	Relevant, always included	<p>Explanation of inclusion: Yapı Kredi attaches importance to water utilities at the local level, since Yapı Kredi procures its major supplies from these stakeholders.</p> <p>Method of engagement: Yapı Kredi follows all decisions and laws to avoid any risks caused by changes in requirements at the local level. The municipalities, which supply water to Yapı</p>

		Kredi, perform regular public reporting on the conditions of water through online notifications. In case of questions, Yapı Kredi can communicate with the respective municipality over formal requests (e.g. email, letter).
Other stakeholder, please specify	Not considered	There are no other stakeholders.

W3.3d

(W3.3d) Describe your organization's process for identifying, assessing, and responding to water-related risks within your direct operations and other stages of your value chain.

In its direct operations Yapı Kredi evaluates the long-term availability and quality of the water used in its facilities. The Environmental Management System Team monitors current and potential regulatory impacts and plans the necessary actions for compliance. In 2015, an assessment was made using the internal environmental impact assessment procedure and the planning risk and opportunity determination form in order to examine the physical, regulatory and reputational water risks for Yapı Kredi facilities and the contractors operating in the facilities. During this assessment L-Type (5*5) Risk Evaluation Matrix Method was used. In this risk assessment, tools such as WBCSD Global Water Tool, WRI Aqueduct Water Risk Atlas were used to identify water stress and risks. The information obtained from these tools feeds Yapı Kredi's risk assessment. The assessment covers all operations within the scope of reporting. Using the WRI Aqueduct Water Risk Atlas, Yapı Kredi assesses the number of facilities located in water-stressed areas. This risk assessment provides support for future water planning at the facility level. For example; unnecessary and excessive water consumption on the basis of employees may cause a decrease in natural resources, limited access to water in the future, and supply of existing water resources at higher costs in facilities located in places with high water stress. These risks are defined as inherent risks for Yapı Kredi. In order to minimize these risks, the Environmental and Social Policy, as well as the Natural Resource Use and Emission Control Instruction, were prepared and shared with employees and subcontractors working at Yapı Kredi facilities. Training and announcements on water efficiency were performed to inform all employees and subcontractors working at Yapı Kredi facilities. In order to prevent unnecessary water use, water consumption was monitored by installing meters in the activity areas of subcontractors, and water leaks were detected through periodic controls and relevant measures were taken. Despite all these actions, risks regarding the reduction of natural resources continue due to unnecessary and excessive water consumption that may occur due to personal negligence. Yapı Kredi, defines this situation as residual risk. The results of this risk assessment are used by Yapı Kredi to take necessary actions. According to the risk category (very high, high, medium, low) determined by the L-Type (5*5) Risk Evaluation Matrix Method, actions are taken from 3 months to 10 years. (Environmental Risk Priority-Impact: Very high A (20-25), High B (10-16), Medium C (4-9), Low D (1-3)) Depending on scale, senior management decisions about risk or opportunity may be made at the facility or business unit level. Risk assessments are reviewed annually through internal audits and action plans are followed.

Yapı Kredi's water-related assessment of its indirect operations is based on its Sustainability Management System, including Environmental and Social Risk Assessment (ESRA) System. In line with the ESRA System, all investment and project finance loans with an investment amount USD 10 million (74 million TL - calculated by using the exchange rate as of 31 December 2020) and above are subject to this assessment with regard to environmental and social aspects. Yapı Kredi's ESRA system has been updated and developed according to the Equator Principles (as of 2020). With this development, the risk assessments conducted for loan and investment requests are updated to include a sector-based approach. The risk category of the investment is determined through the questions which have to be answered within the scope of the ESRA system. This system proceeds to collect sectoral based information about project risks including water related risks; inform customers regarding necessary actions to be taken based on the project risk score; and gather additional information if necessary. Actions to be taken according to the defined risk category are determined in line with IFC Performance Standards. Yapı Kredi's clients are required to develop and / or maintain an Environmental and Social Management System (ESMS) to comply with the applicable standards. Within the scope of this ESMS they have to prepare action and management plans in order to follow up the impact assessment, management and monitoring process of the investment regularly.

Based on the outcomes of the ESRA system investors are required to take necessary environmental measures to manage water related risks such as water stress, water contamination etc. Also, outcomes may impact the Bank's business decisions regarding loan agreements. Any project that does not comply with YKB's Sustainability Management System and its Exclusion List is not financed.

W4. Risks and opportunities

W4.1

(W4.1) Have you identified any inherent water-related risks with the potential to have a substantive financial or strategic impact on your business?

Yes, both in direct operations and the rest of our value chain

W4.1a

(W4.1a) How does your organization define substantive financial or strategic impact on your business?

At Yapı Kredi the "risk/impact matrix" defines the criteria in terms of operational, legal, reputational and financial impacts of risk events from "low" to "very high" risk level, which covers both direct and indirect losses applying to both direct and supply chain operations. This matrix is an internal regulation that has been approved by Board of Directors and utilized in Business Continuity and Risk Management activities to establish objective criteria for risk assessments. The definitions are reviewed regularly and updated if deemed necessary.

Yapı Kredi defines substantive financial or strategic impact as;

1) financially;

- Possibility of financial loss more than 150 Million TRY is "very high" risk level.
 - Possibility of financial loss between 25-150 million TRY is "high" risk level.
 - Possibility of financial loss between 250.000- 25 Million TRY is "moderate" risk level.
 - Possibility of financial loss up to 250.000 TRY is "low" risk level.
- 2) reputational cost; significant loss of reputation among all stakeholders (indicator) such as customers, employees, suppliers, strategic partners, leading to massive public reactions or media / social media crisis,
- 3) operationally; system disruptions, service interruptions or failure to sustain operations due to the significant increase in the workload driven by social or environmental hazards (indicator),
- 4) legally; disruptive consequences such as suspension of operations, licenses revocation or senior management condemnation driven by the breach of laws and legislation (indicator).

Substantive water related impact example: Disruption of operations in branches due to water related acute physical risks such as flooding.

W4.1b

(W4.1b) What is the total number of facilities exposed to water risks with the potential to have a substantive financial or strategic impact on your business, and what proportion of your company-wide facilities does this represent?

	Total number of facilities exposed to water risk	% company-wide facilities this represents	Comment
Row 1	5	100	5 facilities are exposed to water risks.

W4.1c

(W4.1c) By river basin, what is the number and proportion of facilities exposed to water risks that could have a substantive financial or strategic impact on your business, and what is the potential business impact associated with those facilities?

Country/Area & River basin

Turkey

Other, please specify

Marmara Basin

Number of facilities exposed to water risk

5

% company-wide facilities this represents

100%

% company's total global revenue that could be affected

100%

Comment

No additional comments

W4.2

(W4.2) Provide details of identified risks in your direct operations with the potential to have a substantive financial or strategic impact on your business, and your response to those risks.

Country/Area & River basin

Turkey

Other, please specify

Mediterranean Basin

Type of risk & Primary risk driver

Physical

Flooding

Primary potential impact

Increased cost of capital

Company-specific description

Flooding: IPCC Changes in Climate Extremes and their Impacts on the Natural Physical Environment Report suggests that anthropogenic influence on changes in some components of the water cycle (precipitation, snow melt) affect floods. Although direct impact of climate change on floods is open for discussion, it is suggested that higher precipitation levels and snow melts that are also triggered by climate change lead to higher potential for flooding. Warmer atmosphere levels lead to heavier precipitation and evaporation levels, triggering floods. Moreover, rising temperatures that cause snow melts in the mountains can lead to winter flooding.

According to Disaster and Emergency Management Presidency's (AFAD-Turkey) flood occurrence mapping in Turkey, Northeastern Anatolia region is more prone to re-occurrence of flooding incidents. However, when the map is analyzed it is observed that death rates are dispersed throughout all regions of Turkey, suggesting that even in the lower probability of disaster occurrence the impacts can be high. Yapı Kredi has 835 branches located in all regions of Turkey. In the case of a flooding incident Yapı Kredi's operational continuity can be effected.

Timeframe

Current up to one year

Magnitude of potential impact

Medium

Likelihood

Very likely

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact figure (currency)

38,692.22

Potential financial impact figure - minimum (currency)

Potential financial impact figure - maximum (currency)

Explanation of financial impact

In 2020, floods/landslides caused by flood waters occurred at 14 locations of Yapı Kredi. The total cost of the damages caused by the events is TRY 35.174,75. The calculation is based on insurance invoices. In a scenario where these disasters are more likely in the short term, if they occur at the facilities (5 buildings) covered by this report's scope and cause a 10% increase in the damage costs, the probable financial impact would be equivalent to TRY 38,692.22. It should be noted that the total area covered by these buildings is greater than the area occupied by these 14 branches in total.

Primary response to risk

Improve maintenance of infrastructure

Description of response

Action implemented: Yapı Kredi's Business Continuity Management Policy is a guidance for minimizing operational risks. In addition to the said policy, Yapı Kredi ensures business continuity through the Emergency Response Plan, and Crisis Management and Business Recovery Plans. Emergency response Team is coordinated by the Emergency Response Coordinator who is responsible for the actions to be taken in case of such events or disasters. In order to mitigate the potential risk or impact of such incidents frequency of periodic maintenance activities such as maintenance of isolation and drainage pumps were increased. It is difficult to find lasting solutions to decrease the risk of flooding when a branch is located near rivers, but in order to mitigate the risks and be prepared the branches purchased sandbags that hold back rising floodwaters.

Cost of response

38,500

Explanation of cost of response

50 sandbags are bought per branch, 50×14 (branch number)=700. Market price of a sandbag is around TRY 55.

$700 \times 55 =$ TRY 38,500 cost of sandbags for 14 branches (assuming that the same damage would occur at the facilities (5 buildings) within the reporting scope. (The total area covered by these buildings is greater than the area occupied by these 14 branches in total.)

W4.2a

(W4.2a) Provide details of risks identified within your value chain (beyond direct operations) with the potential to have a substantive financial or strategic impact on your business, and your response to those risks.

Country/Area & River basin

Turkey
Other, please specify
Mediterranean Basin

Stage of value chain

Other, please specify
Customers

Type of risk & Primary risk driver

Physical
Drought

Primary potential impact

Reduced revenues from lower sales/output

Company-specific description

Rising mean temperatures especially during summers can lead to droughts and decreased capacity of hydroelectric power plants in the future. Decreased water capacity might lead to disruption of the operations. Yapı Kredi's hydroelectric power plant lending activities are located in Turkey, which is in the Mediterranean Basin that will be greatly affected by rising mean temperatures, thus droughts. The potential capacity disruptions of the hydroelectric power plant projects financed by Yapı Kredi might increase the credit risk of the aforementioned projects, impacting Yapı Kredi's revenues from its corporate and commercial banking activities.

Timeframe

More than 6 years

Magnitude of potential impact

Medium

Likelihood

More likely than not

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact figure (currency)

3,000,592

Potential financial impact figure - minimum (currency)

Potential financial impact figure - maximum (currency)

Explanation of financial impact

Potential financial impact figure is based on a hydroelectric power plant whose average yearly electricity production is 56,000 MWh. In a scenario where 10% of decrease in its capacity in a year due to rising temperatures will result in 50,400 MWh average yearly electricity production. If the revenue generated from the first and the second productions based on market electricity sales price for renewable energy in Turkey (USD 73 /MWh) is calculated.

The calculation would be as follows:

$56,000 * 73 = \text{USD } 4,088,000$ (revenue from the full capacity)

$50,400 * 73 = \text{USD } 3,679,200$ (revenue from the 10% decreased capacity)

$\text{USD } 4,088,000$ (revenue from the full capacity) - $\text{USD } 3,679,200$ (revenue from the 10% decreased capacity) = $\text{USD } 408,800 = \text{TRY } 3,00,592$ revenue loss of the investor due to the decrease in the power plant's capacity in a year.

Since the projects are financed in USD Yapı Kredi has used the current conversion factor (31 December 2020) to give an estimate figure where USD 1 is equivalent to 7.34 TRY. It should be noted that although this fluctuation of capacity increases the credit risk of the project, the financial impact calculated is for the investor, please see "Description of response and explanation of cost calculation" for further understanding.

Primary response to risk

Downstream

Other, please specify

Technical Analysis Prior to Lending and Cash Sweeps

Description of response

For each hydroelectric power plant project Yapı Kredi requests a technical analysis conducted by an external technical expert to prepare a report on water flow fluctuations taking into account long term trends (50-70 years). Once the technical report is presented, Yapı Kredi conducts internal stress tests that go beyond the report's expectations in order to ensure management of credit risk in an optimum manner. No project that do not pass the internal stress thresholds is financed. Moreover, Yapı Kredi ensures that a decrease in capacity is managed during the construction phase of the project. The years where a power plant's capacity is lower than expected are compensated with cash sweep actions in the following years.

Cost of response

110,100

Explanation of cost of response

The stress tests are conducted by credits team and do not require additional costs to the Bank. Average market cost of a technical analysis by an external expert ranges from USD 10,000 to USD20,000 (varies according to size of the project). As an average cost per project Yapı Kredi took USD15,000 into consideration which led to TRY 110,100. Since the analyses are paid in USD, Yapı Kredi has used the current conversion factor (31 December 2020) to give an estimate figure where \$1 is equivalent to TRY 7.34.

W4.3

(W4.3) Have you identified any water-related opportunities with the potential to have a substantive financial or strategic impact on your business?

Yes, we have identified opportunities, and some/all are being realized

W4.3a

(W4.3a) Provide details of opportunities currently being realized that could have a substantive financial or strategic impact on your business.

Type of opportunity

Efficiency

Primary water-related opportunity

Improved water efficiency in operations

Company-specific description & strategy to realize opportunity

One of the water related opportunities is collection of rain water and using it for domestic purposes. This opportunity has a positive impact on the efficient use of water and it results in small cost benefits as well, since it contributes to reduction of water consumption. Yapı Kredi adopts projects related to the implementation of rain water collection and use and aims to extend the scope and number of such projects at its facilities to further contribute to efficient water consumption.

Estimated timeframe for realization

1 to 3 years

Magnitude of potential financial impact

Low-medium

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact figure (currency)

6,000

Potential financial impact figure – minimum (currency)

Potential financial impact figure – maximum (currency)

Explanation of financial impact

Banking Base Facility: The well water tank (1,000 tons tank) in the Banking Base facility is used for garden irrigation. A project has been developed to build collection channels on the top of this tank and to collect the rain water accumulated here and transfer it into the tank. Within the scope of the project, the calculation was made over the precipitation per square meter. According to this calculation, it is aimed to collect approximately 160 cubic meters of rain water per year and use it for garden irrigation. When calculations are made with ISU (Izmit water and sewage administration) unit prices, it is predicted that the project will generate an annual benefit of approximately TRY 1,000. Cost of the project: TRY 50,000.

Plaza D Block: A project is being developed to collect the precipitation from the roof of the Plaza D Block building and use it as utility water. It is planned that the collected rain water will be transferred to the utility water tank and given to the taps. It is predicted that the amount of water to be collected will be around 350 cubic meters per year. When calculations are made with ISKI (Istanbul water and sewage administration) unit prices, it is predicted that the annual benefit provided by the project will be approximately TRY 5,000. Cost of the project: TRY 70,000.

W5. Facility-level water accounting

W5.1

(W5.1) For each facility referenced in W4.1c, provide coordinates, water accounting data, and a comparison with the previous reporting year.

Facility reference number

Facility 1

Facility name (optional)

Banking Base

Country/Area & River basin

Turkey

Other, please specify

Marmara Basin

Latitude

40.84

Longitude

29.41

Located in area with water stress

Yes

Total water withdrawals at this facility (megaliters/year)

55.06

Comparison of total withdrawals with previous reporting year

Much lower

Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

Withdrawals from brackish surface water/seawater

0

Withdrawals from groundwater - renewable

7.3

Withdrawals from groundwater - non-renewable

0

Withdrawals from produced/entrained water

0

Withdrawals from third party sources

47.76

Total water discharges at this facility (megaliters/year)

47.67

Comparison of total discharges with previous reporting year

Much lower

Discharges to fresh surface water

0

Discharges to brackish surface water/seawater

0

Discharges to groundwater

0

Discharges to third party destinations

47.67

Total water consumption at this facility (megaliters/year)

7.39

Comparison of total consumption with previous reporting year

Higher

Please explain

Year-to-year changes of less than 5% were considered "about the same." Year-to-year changes between 5% and 10 % were considered "higher"/"lower". Year-to-year changes over 10% were considered "much higher"/"much lower".Yapı Kredi used WRI Aqueduct Water Risk Atlas to classify the basin's stress level. Volumes are sourced from the water bills and third party suppliers. Withdrawal from third party sources include municipal suppliers and tanker water suppliers. Third party destination is the municipal sewage system. Water consumption include water used for drinking purposes supplied from tanker water suppliers. The values stated as zero are irrelevant values to Yapı Kredi's business in line with its statements in the questions W1.2h and W1.2i.

Facility reference number

Facility 2

Facility name (optional)

Plaza D Block

Country/Area & River basin

Turkey

Other, please specify

Marmara Basin

Latitude

41.08

Longitude

29.01

Located in area with water stress

Yes

Total water withdrawals at this facility (megaliters/year)

20.52

Comparison of total withdrawals with previous reporting year

Much lower

Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

Withdrawals from brackish surface water/seawater

0

Withdrawals from groundwater - renewable

0

Withdrawals from groundwater - non-renewable

0

Withdrawals from produced/entrained water

0

Withdrawals from third party sources

20.52

Total water discharges at this facility (megaliters/year)

20.45

Comparison of total discharges with previous reporting year

Much lower

Discharges to fresh surface water

0

Discharges to brackish surface water/seawater

0

Discharges to groundwater

0

Discharges to third party destinations

20.45

Total water consumption at this facility (megaliters/year)

0.06

Comparison of total consumption with previous reporting year

Much lower

Please explain

Year-to-year changes of less than 5% were considered "about the same." Year-to-year changes between 5% and 10 % were considered "higher"/"lower". Year-to-year changes over 10% were considered "much higher"/"much lower". Yapı Kredi used WRI Aqueduct Water Risk Atlas to classify the basin's stress level. Volumes are sourced from the water bills and third party suppliers. Withdrawal from third party sources include municipal suppliers and tanker water suppliers. Third party destination is the municipal sewage system. Water consumption include water used for drinking purposes supplied from tanker water suppliers. The values stated as zero are irrelevant values to Yapı Kredi's business in line with its statements in the questions W1.2h and W1.2i.

Facility reference number

Facility 3

Facility name (optional)

Darıca Archive

Country/Area & River basin

Turkey
Other, please specify
Marmara Basin

Latitude

40.78

Longitude

29.37

Located in area with water stress

Yes

Total water withdrawals at this facility (megaliters/year)

1.58

Comparison of total withdrawals with previous reporting year

Higher

Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

Withdrawals from brackish surface water/seawater

0

Withdrawals from groundwater - renewable

0.94

Withdrawals from groundwater - non-renewable

0

Withdrawals from produced/entrained water

0

Withdrawals from third party sources

0.64

Total water discharges at this facility (megaliters/year)

0.64

Comparison of total discharges with previous reporting year

Much lower

Discharges to fresh surface water

0

Discharges to brackish surface water/seawater

0

Discharges to groundwater

0

Discharges to third party destinations

0.64

Total water consumption at this facility (megaliters/year)

0.94

Comparison of total consumption with previous reporting year

Higher

Please explain

Year-to-year changes of less than 5% were considered "about the same." Year-to-year changes between 5% and 10 % were considered "higher"/"lower". Year-to-year changes over 10% were considered "much higher"/"much lower". Yapı Kredi used WRI Aqueduct Water Risk Atlas to classify the basin's stress level. Water volumes are sourced from the water bills, third party suppliers and an in-house water meter. Withdrawal from third party sources include municipal suppliers. Third party destination is the municipal sewage system. Withdrawal from fresh surface water is rain water harvested by the facility. Water consumption include water for landscape irrigation sourced from the well and rainwater harvesting. The values stated as zero are irrelevant values to Yapı Kredi's business in line with its statements in the questions W1.2h and W1.2i.

Facility reference number

Facility 4

Facility name (optional)

Bayramoğlu

Country/Area & River basin

Latitude

40.78

Longitude

29.34

Located in area with water stress

Yes

Total water withdrawals at this facility (megaliters/year)

6.14

Comparison of total withdrawals with previous reporting year

Lower

Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

Withdrawals from brackish surface water/seawater

0

Withdrawals from groundwater - renewable

0

Withdrawals from groundwater - non-renewable

0

Withdrawals from produced/entrained water

0

Withdrawals from third party sources

6.14

Total water discharges at this facility (megaliters/year)

6.11

Comparison of total discharges with previous reporting year

Lower

Discharges to fresh surface water

0

Discharges to brackish surface water/seawater

0

Discharges to groundwater

0

Discharges to third party destinations

6.11

Total water consumption at this facility (megaliters/year)

0.03

Comparison of total consumption with previous reporting year

Higher

Please explain

Year-to-year changes of less than 5% were considered "about the same." Year-to-year changes between 5% and 10 % were considered "higher"/"lower". Year-to-year changes over 10% were considered "much higher"/"much lower". Yapı Kredi used WRI Aqueduct Water Risk Atlas to classify the basin's stress level. Water volumes are sourced from the water bills and third party suppliers. Withdrawal from third party sources include municipal suppliers and tanker water suppliers. Third party destination is the municipal sewage system. Water consumption include water used for drinking purposes supplied from tanker water suppliers. The values stated as zero are irrelevant values to Yapı Kredi's business in line with its statements in the questions W1.2h and W1.2i.

Facility reference number

Facility 5

Facility name (optional)

Yeniköy Grove

Country/Area & River basin

Turkey

Other, please specify

Marmara Basin

Latitude

41.12

Longitude

29.07

Located in area with water stress

Yes

Total water withdrawals at this facility (megaliters/year)

2.71

Comparison of total withdrawals with previous reporting year

Much higher

Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

Withdrawals from brackish surface water/seawater

0

Withdrawals from groundwater - renewable

0

Withdrawals from groundwater - non-renewable

0

Withdrawals from produced/entrained water

0

Withdrawals from third party sources

2.71

Total water discharges at this facility (megaliters/year)

2.71

Comparison of total discharges with previous reporting year

Much higher

Discharges to fresh surface water

0

Discharges to brackish surface water/seawater

0

Discharges to groundwater

0

Discharges to third party destinations

2.71

Total water consumption at this facility (megaliters/year)

0

Comparison of total consumption with previous reporting year

Much higher

Please explain

Year-to-year changes of less than 5% were considered "about the same." Year-to-year changes between 5% and 10 % were considered "higher"/"lower". Year-to-year changes over 10% were considered "much higher"/"much lower". Yapı Kredi used WRI Aqueduct Water Risk Atlas to classify the basin's stress level. Water volumes are sourced from the water bills and third party suppliers. Withdrawal from third party sources include municipal suppliers. Third party destination is the municipal sewage. At this facility the water consumption is zero, since landscape irrigation was not performed and there was no consumption related to drinking purposes. The values stated as zero are irrelevant values to Yapı Kredi's business in line with its statements in the questions W1.2h and W1.2i.

W5.1a

(W5.1a) For the facilities referenced in W5.1, what proportion of water accounting data has been externally verified?

Water withdrawals – total volumes

% verified

76-100

What standard and methodology was used?

Yapı Kredi's environmental data including water withdrawal was assured in 2020 in accordance with ISAE 3000 (Revised). The amount of water withdrawal is also verified through the ISO 14046 certification of Yapı Kredi.

Water withdrawals – volume by source

% verified

76-100

What standard and methodology was used?

Yapı Kredi's environmental data including water withdrawal was assured in 2020 in accordance with ISAE 3000 (Revised). The amount of water withdrawal is also verified through the ISO 14046 certification of Yapı Kredi.

Water withdrawals – quality

% verified

Not verified

Water discharges – total volumes

% verified

76-100

What standard and methodology was used?

The amount of Yapı Kredi's water discharge is certified within the scope of its ISO 14046 certification process.

Water discharges – volume by destination

% verified

76-100

What standard and methodology was used?

The amount of Yapı Kredi's water discharge is certified within the scope of its ISO 14046 certification process.

Water discharges – volume by treatment method

% verified

Not verified

Water discharge quality – quality by standard effluent parameters

% verified

Not verified

Water discharge quality – temperature

% verified

Not verified

Water consumption – total volume

% verified

76-100

What standard and methodology was used?

Yapı Kredi's environmental data including water consumption was assured in 2020 in accordance with ISAE 3000 (Revised). Yapı Kredi's water consumption is also verified within the scope of its ISO 14046 certification process.

Water recycled/reused

% verified

76-100

What standard and methodology was used?

Yapı Kredi's environmental data including water reused (rainwater harvesting) was assured in 2020 in accordance with ISAE 3000 (Revised). The amount of reused water (rainwater harvesting) by Yapı Kredi is also verified within the scope of its ISO 14046 certification process.

W6. Governance

W6.1

(W6.1) Does your organization have a water policy?

Yes, we have a documented water policy that is publicly available

W6.1a

(W6.1a) Select the options that best describe the scope and content of your water policy.

	Scope	Content	Please explain
Row 1	Company-wide	Description of business dependency on water Description of business impact on water Description of water-related performance	Yapı Kredi has an E&S Policy as a part of its Environmental Management System which indicates business dependency on water, impact on water, targets, water related performance standards for direct operations, reference to international standards and water initiatives, and goals to draw attention to water issues and raise awareness within the value chain. The policy acknowledges that Yapı Kredi's direct water impact is limited and Yapı Kredi does not depend on water resources from a water affected area for its direct operations. Yapı Kredi's ESRA System prepared in accordance with the international standards (IFC

		<p>standards for direct operations</p> <p>Reference to international standards and widely-recognized water initiatives</p> <p>Company water targets and goals</p> <p>Commitment to stakeholder awareness and education</p>	<p>Performance Standards and Equator Principles) allows Yapı Kredi to manage its impact on water arising through its lending activities. Through the implementation of such standards the following issues are aimed:</p> <ul style="list-style-type: none"> • water conservation measures for the investments • the use of alternative water supplies • water consumption offsets to reduce total demand for water resources and keeping this demand within the limits of the available supply • evaluation of alternative project locations <p>Yapı Kredi had a company wide target to reduce its water consumption by 4% in 2020 taking 2015 as the base year. This target was overachieved with a total reduction rate of 41.22%. Within the scope of its five-year environmental strategy, Yapı Kredi aims to reduce water density (m3/mio number of transactions) by 56% until 2025. The base year determined within the scope of this target, in which annual water consumption is proportioned to the number of transactions carried out within the scope of banking activities, is 2019. Yapı Kredi also provides training regularly to its employees and its subcontractors that are working on its facilities.</p> <p>The Bank continued to verify all water relevant data within the scope of its ISO 14046 Direct Water Footprint Certificate for its Head Offices and facility buildings. Yapı Kredi's dependency on water at its facilities is limited, however in relation with its lending activities water resources make up an important component of its hydroelectric portfolio and agricultural activities. Yapı Kredi manages environmental impacts including water impacts via its ESRA System based on IFC Performance Standards and local regulation. Yapı Kredi's impact on water through its operational activities is limited, however Yapı Kredi closely monitors its direct water footprint and takes necessary measures to reduce its direct impact.</p>
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W6.2

(W6.2) Is there board level oversight of water-related issues within your organization?

Yes

W6.2a

(W6.2a) Identify the position(s) (do not include any names) of the individual(s) on the board with responsibility for water-related issues.

Position of individual	Please explain
Director on board	<p>Yapı Kredi's sustainability related activities are managed under the supervision of the Sustainability Committee. Water related topics such as management of water related risks & opportunities linked to operations as well as project finance and setting up strategies/defining targets with regards to reduction of water consumption are part of the Sustainability Committee's duties within the scope of its responsibilities on the environmental dimension. Risks related to operation and financing activities are assessed by the Committee.</p> <p>The members of the Sustainability Committee are as following:</p> <ul style="list-style-type: none"> • Board Member (Chair) • Assistant General Manager (AGM) Credits • AGM - Human Resources, Organization & Internal Services • AGM - (COO) Information Technologies and Operations • AGM - (CFO) Financial Planning and Administration • AGM - Compliance, Internal Control and Risk • AGM - Retail Banking • Executive Vice President (EVP) Corporate Banking Sales • EVP Strategic Planning and Investor Relations • Director Corporate Communications <p>Meeting twice a year to assess, monitor and guide developments with regards to sustainability, the Committee reports annually to the Executive Committee and to the Board of Directors. Corporate Communications Director, who directly reports to the CEO, is responsible for conduction of the overall sustainability practices at Yapı Kredi. There is a dedicated Sustainability Team, reporting to the Corporate Communications Director. Additionally, there are six working groups working under the guidance of the Sustainability Committee and with the coordination support of the Sustainability Team. Water-related topics also constitute an important agenda item of the working groups related to Operational Environmental Impact and Sustainability Management of Loans. The Process and Program Management Group Director, reporting directly to the COO, is responsible for the process of managing environmental impacts arising from operational activities.</p>

W6.2b

(W6.2b) Provide further details on the board's oversight of water-related issues.

	Frequency that water-related issues are a scheduled agenda item	Governance mechanisms into which water-related issues are integrated	Please explain
Row 1	Scheduled - some meetings	Monitoring implementation and performance	Yapı Kredi's sustainability related activities are managed under the supervision of the Sustainability Committee, established in 2014, chaired by a Board Member. Yapı Kredi evaluates the potential risks

		<p>Reviewing and guiding business plans</p> <p>Reviewing and guiding major plans of action</p> <p>Reviewing and guiding risk management policies</p> <p>Reviewing and guiding strategy</p> <p>Reviewing and guiding corporate responsibility strategy</p> <p>Setting performance objectives</p>	<p>and opportunities in the short, medium and long- term, and defines its sustainability goals through the Sustainability Committee, composed of a Board Member and senior executives.</p> <p>The members of the Sustainability Committee are as following:</p> <ul style="list-style-type: none"> • Board Member (Chair) • Assistant General Manager Credits • Assistant General Manager Human Resources, Organization & Internal Services Management • Assistant General Manager (COO) Information Technologies and Operations Management • Assistant General Manager (CFO) Financial Planning and Administration Management • Assistant General Manager Compliance, Internal Control and Risk Management • Assistant General Manager Retail Banking Management • Executive Vice President Corporate Banking Sales Management • Executive Vice President Strategic Planning and Investor Relations • Director Corporate Communications Management <p>The Committee reports to the Board and Executive Committee on annual basis.</p> <p>Sustainability Committee reviews and guides Yapı Kredi's sustainability strategy, plans of action implemented at the organization following its decisions, risk management policies, sustainability expenditure, targets & objectives and overall sustainability performance. While acting upon these mechanisms when necessary the Sustainability Committee's decisions are presented to the Board for their approval.</p> <p>Description of how the selected governance mechanisms contribute to the Board's oversight of water issues: While reviewing Yapı Kredi's strategy and business plans the insights of the Sustainability Committee are taken into account. Environmental Management System (EMS) and Environmental and Social Risk Assessment (ESRA) System, two mechanisms approved by the Board, allow Yapı Kredi to run its business while managing its direct and indirect water impacts. Moreover, via ESRA System while reviewing and guiding the risk</p>
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			<p>management policies, risks of certain sectors that have an important impact on water, and reputational risks that might arise from water risks are taken into account. Performance outcomes of EMS and ESRA are shared with the Sustainability Committee, relevant expenditures for water management in the buildings and performance requirements of relevant staff are considered. Lastly, water performance is also taken into account for social responsibility projects. In the reporting year Yapı Kredi contacted several actors in the civil society to further contribute to water security and sanitation.</p>
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W6.3

(W6.3) Provide the highest management-level position(s) or committee(s) with responsibility for water-related issues (do not include the names of individuals).

Name of the position(s) and/or committee(s)

Sustainability committee

Responsibility

Both assessing and managing water-related risks and opportunities

Frequency of reporting to the board on water-related issues

Annually

Please explain

Meeting twice a year to assess, monitor and guide developments with regards to sustainability, the Sustainability Committee reports annually to the Executive Committee and to the Board of Directors. Corporate Communications Director, who directly reports to the CEO, is responsible for conduction of the overall sustainability practices at Yapı Kredi. There is a dedicated Sustainability Team reporting to the Corporate Communications Director. The Committee is responsible for overall water management at Yapı Kredi including water impact arising from its direct operations (buildings) and indirect impact from its lending activities. Water related topics such as management of water related risks & opportunities linked to operations as well as project finance and setting up strategies/defining targets with regards to reduction of water consumption are part of the Sustainability Committee's duties within the scope of its responsibilities on the environmental dimension.

W6.4

(W6.4) Do you provide incentives to C-suite employees or board members for the management of water-related issues?

	Provide incentives for management of water-related issues	Comment
Row 1	Yes	

W6.4a

(W6.4a) What incentives are provided to C-suite employees or board members for the management of water-related issues (do not include the names of individuals)?

	Role(s) entitled to incentive	Performance indicator	Please explain
Monetary reward	Chief Operating Officer (COO) Other, please specify Process and Program Management Group Director (direct Report of the COO)	Reduction of water withdrawals Reduction in consumption volumes Improvements in efficiency - direct operations	Chief Operating Officer (COO): Among the KPIs defined for the COO there is the below KPI which addresses resource efficiency including water. Implementation of projects for efficiency and resource saving (energy, water, etc.) through process improvements and ensuring compliance with the norm staff target. Process and Program Management Group Director (direct Report of the COO) : Reducing carbon emissions from the organization's properties and saving water and energy for a sustainable environment.
Non-monetary reward			

W6.5

(W6.5) Do you engage in activities that could either directly or indirectly influence public policy on water through any of the following?

Yes, other

W6.5a

(W6.5a) What processes do you have in place to ensure that all of your direct and indirect activities seeking to influence policy are consistent with your water policy/water commitments?


Yapı Kredi's direct water footprint is limited. In order to ensure alignment with its water commitments Yapı Kredi annually carries out ISO 14046 direct water footprint verification and limited assurance in line with ISAE 3000 (Revised) of its water consumption. With regards to its lending activities the ESRA System is put in place, where Yapı Kredi's environmental teams engage with its clients to minimize their environmental impacts including water impacts. About water management issues, these standards includes assessment methods and mitigation measures such as the use of additional technically feasible water conservation measures within the client's operations, the use of alternative water supplies, water consumption offsets to reduce total demand for water resources and to limit this demand within the scope of the available supply, and evaluation of alternative project locations.

Water targets relating to Yapı Kredi's direct operations are monitored annually and are part of relevant staff's performance assessment. In case of inconsistency, relevant department works towards improving and aligning the outcome with the commitment. With regards to the ESRA system, in case of inconsistency the environmental teams try to engage and seek further support from environmental experts assigned for the project. In both cases, should the need arise, the inconsistency is discussed at the Sustainability Committee where high level of decision making members are able to take action.

W6.6

(W6.6) Did your organization include information about its response to water-related risks in its most recent mainstream financial report?

Yes (you may attach the report - this is optional)

 EFR_YKB_ENG_2020.pdf

W7. Business strategy

W7.1

(W7.1) Are water-related issues integrated into any aspects of your long-term strategic business plan, and if so how?

	Are water-related issues integrated?	Long-term time horizon (years)	Please explain
Long-term business objectives	Yes, water-related issues are integrated	5-10	Yapı Kredi's water related indirect impacts are considered within the scope of its business objectives. As a bank operational water consumption is not capital for Yapı Kredi, whereas water is an important renewable

			<p>energy source that might have an impact on Yapı Kredi's lending activities. With this perspective, Yapı Kredi aims to integrate physical and transitional risks and also opportunities related to water security issues into its portfolio management practices. The long term business objectives of Yapı Kredi will be aligned with the identified risks and opportunities meaning that its objectives with regards to the lending activities will be determined accordingly. Yapı Kredi aims to introduce new financial products and increase the share/diversity of these products in its portfolio. Due to the recent regulatory developments associated with water related issues, Yapı Kredi expects that the future market opportunities with regards to sustainable finance products will increase. Yapı Kredi wants to avoid a loss in revenue due to potential loss of market share which may arise due to changing market conditions. These changes in the market conditions might also lead to increased cost of capital. Through adapting to the new market conditions, the risks can be converted into opportunities. Through increasing the amount and the diversity of its sustainable product portfolio, Yapı Kredi aims to increase its market share in this field.</p>
Strategy for achieving long-term objectives	Yes, water-related issues are integrated	5-10	<p>To reach its long-term business objective of responding to water scarcity, Yapı Kredi aims to raise awareness on water related issues with its customers, clients and general public via training and social media programs. In addition Yapı Kredi plans to collaborate further with civil society on water related issues via corporate social responsibility projects.</p> <p>Example of strategy of achieving long term objectives: Yapı Kredi is in the process of preparing an online training program on environment for its stakeholders that comprises water scarcity issue. In addition to better address water related risks Yapı Kredi adopts the recommendations of TCFD and works towards becoming fully compliant with them. In order to meet the recommendations of TCFD, Yapı Kredi conducted a climate change risk analysis on its credit portfolio taking physical and transition risks into account. Yapı Kredi considers to integrate the climate risks into its default credit risks modelling which will result in a more systematic risk management approach with regards to climate risks including water related risks. Establishment</p>

			of this robust risk management structure will enable Yapı Kredi to define its long term strategies and targets in a more solid manner.
Financial planning	Yes, water-related issues are integrated	5-10	Yapı Kredi's ESRA system is implemented for environmental and social risk management of its lending activities including management of water related risks. In addition to better address water related risks Yapı Kredi adopts the recommendations of TCFD and works towards becoming fully compliant with them. In order to meet the recommendations of TCFD, Yapı Kredi conducted a climate change risk analysis on its credit portfolio taking physical and transitional risks into account. Yapı Kredi considers to integrate the climate risks into its default credit risks modelling which will result in a more systematic risk management approach with regards to water related risks. The integration of water related risks into the credit risk rating will allow to conduct scenario analyses and stress test for periods beyond 5 years. As a result of that Yapı Kredi will be able to analyse/monitor changes in revenue, expenditures and assets taking the water related risks into account. As a consequence of that, the financial planning of water related issues will be made more effectively. Water related risks in terms of operations are identified by the Process and Program Management Group Directorate and measures to deter these risks are designated in which the financial analysis and planning with regards to these measures is also performed.

W7.2

(W7.2) What is the trend in your organization's water-related capital expenditure (CAPEX) and operating expenditure (OPEX) for the reporting year, and the anticipated trend for the next reporting year?

Row 1

Water-related CAPEX (+/- % change)

-5.56

Anticipated forward trend for CAPEX (+/- % change)

95.19

Water-related OPEX (+/- % change)

-5.92

Anticipated forward trend for OPEX (+/- % change)

13.63

Please explain

Explanation of % change: Since Yapı Kredi renovated and repaired most of the plumbing system (including taps and water pipelines) with the purpose of increasing water efficiency in the previous years, Yapı Kredi's CAPEX is decreased compared to the previous year. Yapı Kredi's OPEX is decreased compared to the previous year because water withdrawal from the municipality supplier decreased as a result of CAPEX investments that ensured water efficiency. The number of employees is decreased resulting in a lower water consumption. Yapı Kredi also managed to decrease the volume of water used in reservoirs through reduction of their capacities. Water related CAPEX and OPEX expenditure: Water related CAPEX expenditure includes replacement of faucets with photocell faucets, repair of the plumbing system. Water related OPEX includes water withdrawal from the municipality suppliers and water procured in tankers.

W7.3

(W7.3) Does your organization use climate-related scenario analysis to inform its business strategy?

	Use of climate-related scenario analysis	Comment
Row 1	Yes	

W7.3a

(W7.3a) Has your organization identified any water-related outcomes from your climate-related scenario analysis?

Yes

W7.3b

(W7.3b) What water-related outcomes were identified from the use of climate-related scenario analysis, and what was your organization's response?

	Climate-related scenarios and models applied	Description of possible water-related outcomes	Company response to possible water-related outcomes
Row 1	Nationally determined contributions (NDCs)	Yapı Kredi considers Turkey's INDC in our direct operations as a climate-related scenario. This scenario is a 21% decrease from the business as usual scenario by 2030. As a developing economy,	Yapı Kredi considers Turkey's INDC in its direct operations as a climate-related scenario. This scenario is a 21% decrease from the business as usual scenario by 2030. As a developing economy, Turkey has plans to grow, and

		<p>Turkey has plans to grow, and as part of a growing economy, Yapı Kredi aims to emerge responsibly.</p> <p>Emission reduction activities may cause change in water consumption directly or indirectly. Water-related outcomes caused by climate change such as floods, drought and inadequate access to clean water are taken into account while analyzing this scenario.</p>	<p>as part of a growing economy, Yapı Kredi aims to emerge responsibly. Since climate related scenarios also have impact on water related issues, this scenario is taken into account.</p> <p>Anticipated timescale for the company's response: Yapı Kredi is committed to reduce its GHG emissions in line with Turkey's scenario by 2030. Efficient water management to better respond to impacts of climate change such as droughts will also be taken into account during this period. Within the scope of its five-year environmental strategy, Yapı Kredi aims to reduce water intensity of municipal water in all its locations by 56% until 2025.</p> <p>Description of operational or strategic response to the water related outcomes: Emission reduction activities may cause change in water consumption directly or indirectly. Decreasing water consumption also means lower operational costs in addition to the obtained efficiency. This is an additional motivation for Yapı Kredi to integrate water related issues to its strategic plans. Furthermore, when allocating loans within the ESRA System Yapı Kredi will be paying further attention to the water risk trends for projects such as hydro power.</p>
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W7.4

(W7.4) Does your company use an internal price on water?

Row 1

Does your company use an internal price on water?

No, but we are currently exploring water valuation practices

Please explain

We are aware of water is becoming increasingly scarce and contested and we anticipate using an internal price on water within the next two years.

W8. Targets

W8.1

(W8.1) Describe your approach to setting and monitoring water-related targets and/or goals.

	Levels for targets and/or goals	Monitoring at corporate level	Approach to setting and monitoring targets and/or goals
Row 1	Company-wide targets and goals Business level specific targets and/or goals Site/facility specific targets and/or goals Country level targets and/or goals	Targets are monitored at the corporate level Goals are monitored at the corporate level	Within the scope of its performance evaluation, Yapı Kredi has included targets related to water within the framework of non-financial targets since 2015. Targets are set by identifying water-scarce areas using the WRI Aqueduct Water Risk Atlas tool, along with identified risks and impacts related to water issues. In addition, Yapı Kredi sets some targets in order to monitor the progress of water related projects developed to be implemented in the field. Yapı Kredi sets specific targets for the water problems of the area and basin in which it operates. These targets are set and monitored by the Environmental Team. Furthermore, company-wide targets are set for operational efficiency, all of which are monitored at the corporate level. There are additional goals/targets set by Koç Holding (Yapı Kredi's main shareholder) with regards to environment in general, water in particular. In this regard, the target designated for the previous reporting period was obtaining the ISO 14046 Certificate. In 2020, this target was revised as ensuring the continuity of this certificate. As of 2021, it is aimed to reduce water consumption by 56% until 2025 (base year: 2019). This target is an intensity target and is calculated dividing the total water consumption by the total number of transactions (annual). The targets set within this framework are also followed by Koç Holding, Yapı Kredi's main shareholder. Yapı Kredi's water consumption undergoes annual independent audits within the scope of ISO 14001 Environmental Management System, ISO 14046 Direct Water Footprint and Integrated Annual Report. Also, environmental targets are monitored by external specialists in order to obtain the ISO 14001 certification.

W8.1a

(W8.1a) Provide details of your water targets that are monitored at the corporate level, and the progress made.

Target reference number

Target 1

Category of target

Water withdrawals

Level

Site/facility

Primary motivation

Water stewardship

Description of target

Yapı Kredi's long-term corporate goals include reducing the water consumption at head office buildings by 4%. Being fully aware that the world's water resources are limited, Yapı Kredi believes water security is an issue every actor should act on. This includes monitoring its own water consumption as part of its efforts to ensure efficient use of natural resources. Since Yapı Kredi is in the financial sector and its water withdrawal is limited to water usage in the office buildings, it sets realistic targets considering water consumption needs of the personnel. Yapı Kredi's water efficiency efforts performed included maintenance and repair activities related to the plumbing system for prevention of water leaks, replacement of existing faucets with photocell faucets for reduction of water consumption, reduction of reservoir capacities, communication activities for awareness-raising and monitoring. Yapı Kredi monitors water withdrawal at its headquarters through third party invoices.

Quantitative metric

% reduction in total water withdrawals

Baseline year

2015

Start year

2015

Target year

2020

% of target achieved

100

Please explain

Yapı Kredi's water withdrawal in 2020 decreased by 41.22% compared to 2015 water withdrawal volume whereas the target was set as 4%. Thus, Yapı Kredi reached more than 100% (-1030,5) of its target in 2020. In this reduction, water efficiency projects had an impact, as well as the pandemic that developed in 2020.

Target reference number

Target 2

Category of target

Monitoring of water use

Level

Brand/product

Primary motivation

Recommended sector best practice

Description of target

Being fully aware that the world's water resources are limited, Yapı Kredi treats the issue of water shortage through a holistic approach. This includes monitoring its own water consumption in line with international standards as part of its efforts to ensure efficient use of natural resources. Hence, one of Yapı Kredi's short term goals was to successfully obtain Statement of Conformity of Yapı Kredi's Direct Water Footprint certification of its head offices and service buildings in line with ISO 14046 standards. The audit system would allow to correct any miscalculations for reporting and further enhance the transparency of Yapı Kredi. In 2020 Yapı Kredi's 2019 direct water footprint was verified by the independent audit firm RINA. Yapı Kredi targets to ensure the continuity of the ISO 14046 certification.

Quantitative metric

% sites monitoring water withdrawals total volumes

Baseline year

2019

Start year

2019

Target year

2020

% of target achieved

100

Please explain

Yapı Kredi's goal of maintaining the Direct Water Footprint Conformity Statement of its Headquarters and service buildings in accordance with ISO 14046 standards was achieved with the completion of the audit process in April 2021. Documentation can be viewed in Question W9. 1 A. As this is a certification, it is not a cumulative target to be achieved over the years.

Target reference number

Target 3

Category of target

Product water intensity

Level

Brand/product

Primary motivation

Recommended sector best practice

Description of target

Within the scope of its five-year environmental strategy, Yapı Kredi aims to reduce water intensity of municipal water in all its locations by 56% until 2025. The base year determined within the scope of this target, in which annual water consumption is proportioned to the number of transactions carried out within the scope of banking activities, is 2019.

Yapı Kredi conducts its activities in the banking sector and water withdrawal is limited to the use of water in office buildings, it sets realistic targets considering the water consumption needs of its personnel. Bank has a goal of expanding water efficiency projects which is mentioned in Target 1 in all its locations by 2025. Yapı Kredi monitors the water withdrawals at its headquarters with third party invoices. In other locations the water withdrawals will started to be monitored through an internal data collection platform after completion of the relevant project conducted for the establishment of this data collection system.

Quantitative metric

Other, please specify

The ratio of annual water consumption to the number of transactions related to banking activities "m3/mio transaction number"

Baseline year

2019

Start year

2021

Target year

2025

% of target achieved

0

Please explain

Compared to the base year, the decrease in density in 2020 is 29%. However, evaluations regarding the target will be stated in 2022, since has been set for 2021.

W8.1b

(W8.1b) Provide details of your water goal(s) that are monitored at the corporate level and the progress made.

Goal

Other, please specify
Awareness raising trainings

Level

Company-wide

Motivation

Water stewardship

Description of goal

Being fully aware that the world's water resources are limited, Yapı Kredi treats the issue of water shortage through a holistic approach. Yapı Kredi believes behavioural change is an important component of water stewardship, every actor including individuals and companies can make their contribution towards a sustainable economy and lifestyle. With this purpose in mind every year Yapı Kredi sets a target of realizing awareness raising activities including conducting trainings annually.

Baseline year

2019

Start year

2019

End year

2020

Progress

Indicators used to assess progress: Number of employees that completed the environmental training (subjects including water security).

Measurement of success: In 2020, 770 hours of environmental training was provided to 1,856 Yapı Kredi employees. Limited assurance by an independent audit firm is obtained to verify the total number of employees who participated the environmental training within the reporting period.

Goal

Other, please specify
Awareness raising communication campaigns

Level

Company-wide

Motivation

Shared value

Description of goal

Being fully aware that the world's water resources are limited, Yapı Kredi treats the issue of water shortage through a holistic approach. Yapı Kredi believes behavioural change is an important component of water stewardship, every actor including individuals and companies can make their contribution towards a sustainable economy and lifestyle. With this purpose in mind every year Yapı Kredi has a goal of conducting awareness raising activities to create a corporate consciousness on environmental protection and water security.

Baseline year

2019

Start year

2019

End year

2020

Progress

Indicators used to assess progress: Number of corporate posts in intranet/mailings that contribute to raise awareness on water security. Number of activities conducted to help create a shared value among employees to reinforce corporate identity on sustainability as a whole and specifically water security consciousness.

Measurement of success: Since it is difficult to measure behavioural change Yapı Kredi measures number of activities and communications conducted throughout the year.

In 2020, 12 internal memos, 3 of which are purely for water safety, were published on the intranet platform. Water stress was mapped by region in communication; water terminology such as "water stress", "virtual water", "water footprint" were defined; domestic, industrial and food water footprints were demonstrated.

As Yapı Kredi does every year, an internal communication campaign "Respect to Environment" in March to commemorate World Water Day and International Day of Forests was conducted in 2020 as well. In this campaign, Yapı Kredi posted water and forests related communications during the relevant week to raise awareness to the issues related to water and forests. As an integral part of the campaign Yapı Kredi organized a creative reading activity for Yapı Kredi employees in 2020 that simulated an interactive process of understanding environment's place in the people's daily lives.

W9. Verification

W9.1

(W9.1) Do you verify any other water information reported in your CDP disclosure (not already covered by W5.1a)?

Yes

📎 WFP_Certificate_020_YAPI KREDI_2021.pdf

W9.1a

(W9.1a) Which data points within your CDP disclosure have been verified, and which standards were used?

Disclosure module	Data verified	Verification standard	Please explain
W1 Current state	Water withdrawal by source (W1.2b)	ISAE 3000	Independent limited assurance was provided for all locations (in Turkey) of Yapı Kredi including but not limited to the scope of the CDP Reporting by PwC in compliance with ISAE 3000 (Revised). This is a standard annual assurance system that Yapı Kredi voluntarily carries out with an independent audit firm as part of its integrated annual reporting procedure.
W1 Current state	The Direct Water Footprint Inventory Report (W1.2b, W1.2h)	Other, please specify ISO 14046:2014	This report summarizes the findings of the verification of the WFP by RINA of the products/services/organization reported in the cover, performed on the basis of the verification criteria/requirements of an agreed system/scheme.
W6 Governance	Members of the Sustainability Management Structure (W6.2, W6.3)	ISAE 3000	Independent limited assurance was provided by PwC on Yapı Kredi's Sustainability Committee's structure and members, a structure chaired by a Board member.
W8 Targets	Environmental trainings that also addresses water security (W8.1b)	ISAE 3000	(W8.1b) – Target with regards to environmental training that also addresses water safety: Limited assurance has been provided by PwC, an independent audit company, regarding the training provided by Yapı Kredi to its employees in 2020 compliance with ISAE 3000 (Revised). In this context, 770 hours of environmental training were provided to 1,856 Yapı Kredi employees in 2020. This is a standard annual assurance system that Yapı Kredi voluntarily carries out with an independent audit firm.
W2 Business impacts	Water related regulatory violations and fees (W2.2)	ISAE 3000	Independent limited assurance was provided by PwC on "monetary value of fines received on account of noncompliance with the Environmental Law and regulations". Accordingly Yapı Kredi did not received any fines on the account of noncompliance with the Environmental Law and

			regulations that includes water related regulatory violations and fees.
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W10. Sign off

W-FI

(W-FI) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.

W10.1

(W10.1) Provide details for the person that has signed off (approved) your CDP water response.

	Job title	Corresponding job category
Row 1	CEO	Chief Executive Officer (CEO)

W10.2

(W10.2) Please indicate whether your organization agrees for CDP to transfer your publicly disclosed data on your impact and risk response strategies to the CEO Water Mandate's Water Action Hub [applies only to W2.1a (response to impacts), W4.2 and W4.2a (response to risks)].

Yes

Submit your response

In which language are you submitting your response?

English

Please confirm how your response should be handled by CDP

	I am submitting to	Public or Non-Public Submission
I am submitting my response	Investors	Public

Please confirm below

I have read and accept the applicable Terms