ENRICHING PERSPECTIVES

nurolBANK

2020 ACTIVITY REPORT

INTRODUCING THE INVESTMENT WORLD FRESH PERSPECTIVES

There are many factors that influence our perspective on events. Such as our priorities, knowledge, values, principles, educational backgrounds, needs, and expectations... Therefore, people have different perspectives, interpret events and approach problems differently. To make a healthy assessment in every situation, to read the sector and the world correctly, and to meet different expectations of our customers, we believe that it is necessary - just like in architecture - to expand our point of view in line with certain rules and a multidimensional approach, and to blend them with creative ideas, in order to add new perspectives to the world of investment.

OUR BANK

ABOUT US

About Us

Nurolbank, which started its operations in 1999 and whose General Directorate is in Istanbul, offers its clients a wide range of investment banking and corporate banking services.

With its capital structure and qualified human resources, Nurolbank aims to create economic value with the awareness of being involved among the leading banks in the field of investment banking in Turkey, and to serve customers with whom it can establish long time relationships and who are in need of various financing products.

Nurolbank offers services that enable all of its customers to increase their productivity and reduce the level of risk they incur, significantly control their costs and increase their market share.

Nurolbank provides creative and innovative products and services on the following issues in accordance with the needs of its customers with the knowledge and experience of its team consisting of professionals with technical expertise and local market experience.

- Financing instruments constructed to provide alternative sources of fund,
- Complex financial modeling,
- Optimum financial package configuration,
- Equity finance consultancy,
- Creation of new sources of funds from local and international institutions and capital markets

Nurolbank continues down its road through its bank management policies established with cautious and sound forecasts. Our Bank will continue to serve with information and flexible financial solutions at the right time for companies in today's variable, interdependent and highly competitive markets.

OUR VISION, OUR MISSION, OUR STRATEGIES

Our Vision
To provide solutions at global standards for the organizations that need support in financial issues in Turkey.

Our mission
To identify the financial problems and needs of our customers and to offer solutions, and to be a niche bank capable of realizing these solutions, providing its shareholders with returns equal to at least market conditions and standing on its own feet independent of the group

Strategy
- To focalize all our staff on the target with corporate culture and team mentality,
- To give importance to resource and product variety,
- To develop products and services by identifying customer needs well and to provide intermediary services,
- To become the best investment bank of Turkey.

TO BRING DIFFERENT PERSPECTIVES TOGETHER FOR A SHARED VISION

CREATING A STRONG STRUCTURE

CAPITAL, PARTNERSHIP STRUCTURE and SHARE PROPORTIONS OF THE BOARD MEMBERS

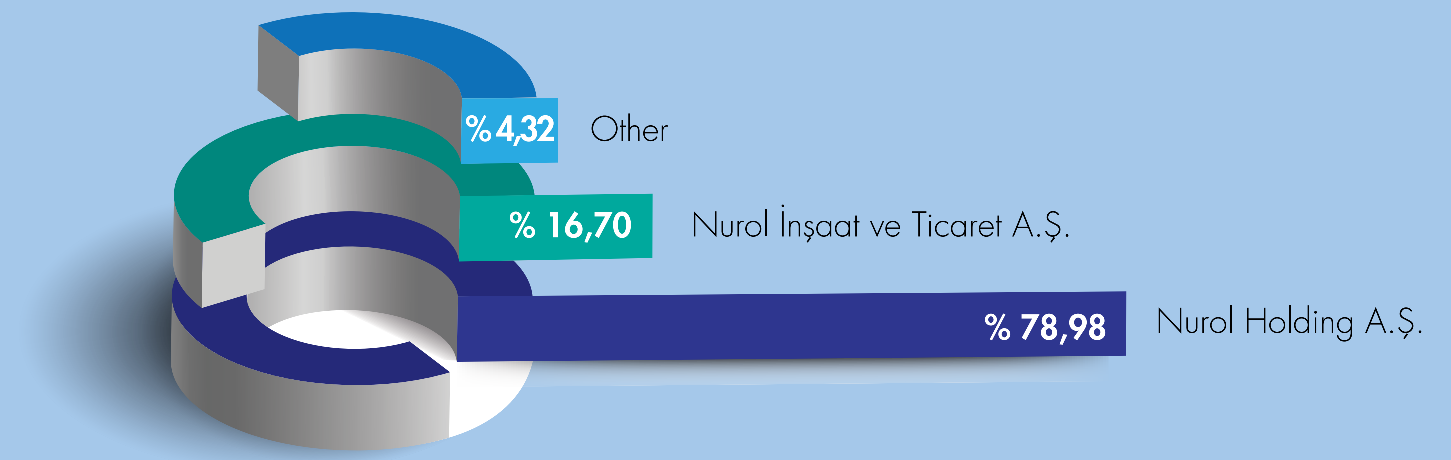
As of 31 December 2020, the shareholders and the capital structure are as follows:

Name and Surname / Trade Name	Number of Shares (Thousand)	Share Equivalent	Share Ratio %
Nurol Holding A.Ş.	284,336,536	284,336,536	%78,98
Nurol İnşaat ve Ticaret A.Ş.	60,134,400	60,134,400	%16,70
Nurol Otelcilik ve Turizm İşletmeleri A.Ş.	2,329,068	2,329,068	%0,65
Nurettin Çarmıklı	2,346,666	2,346,666	%0,65
Erol Çarmıklı	2,346,666	2,346,666	%0,65
Mehmet Oğuz Çarmıklı	2.,346,666	2,346,666	%0,65
Eyüp Sabri Çarmıklı	2,053,333	2,053,333	%0,57
Oğuzhan Çarmıklı	2,053,333	2,053,333	%0,57
Gürol Çarmıklı	1,026,666	1,026,666	%0,29
Gürhan Çarmıklı	1,026,666	1,026,666	%0,29
Toplam	360,000.000	360,000,000	%100,00

The shares of the Chairman and Deputy Chairmen of the Board as of the end of 2020 are given in the table below. The General Manager and the Board Members do not have any shares in the bank except the Board Members in the table below

	Number of Shares	Share Ratio %
Mehmet Oğuz Çarmıklı - Deputy Chairman of the Board	2.346.666	%0,65
Eyüp Sabri Çarmıklı - Board Member	2.053.333	%0,57
Gürhan Çarmıklı - Board Member	1.026.666	%0,29

NUROLBANK PARTNERSHIP STRUCTURE



In accordance with the decision taken at the 22.06.2020 dated extraordinary general assembly meeting, the Company Capital was increased from 300,000,000.00 TL to 360,000,000.00 TL and 60.000.000,00 TL of this increase is met from 2019 profit.

MAKING A DIFFERENCE IN OUR FIELD

NUROLBANK'S OBJECTIVES AND EXPECTATIONS IN 2021

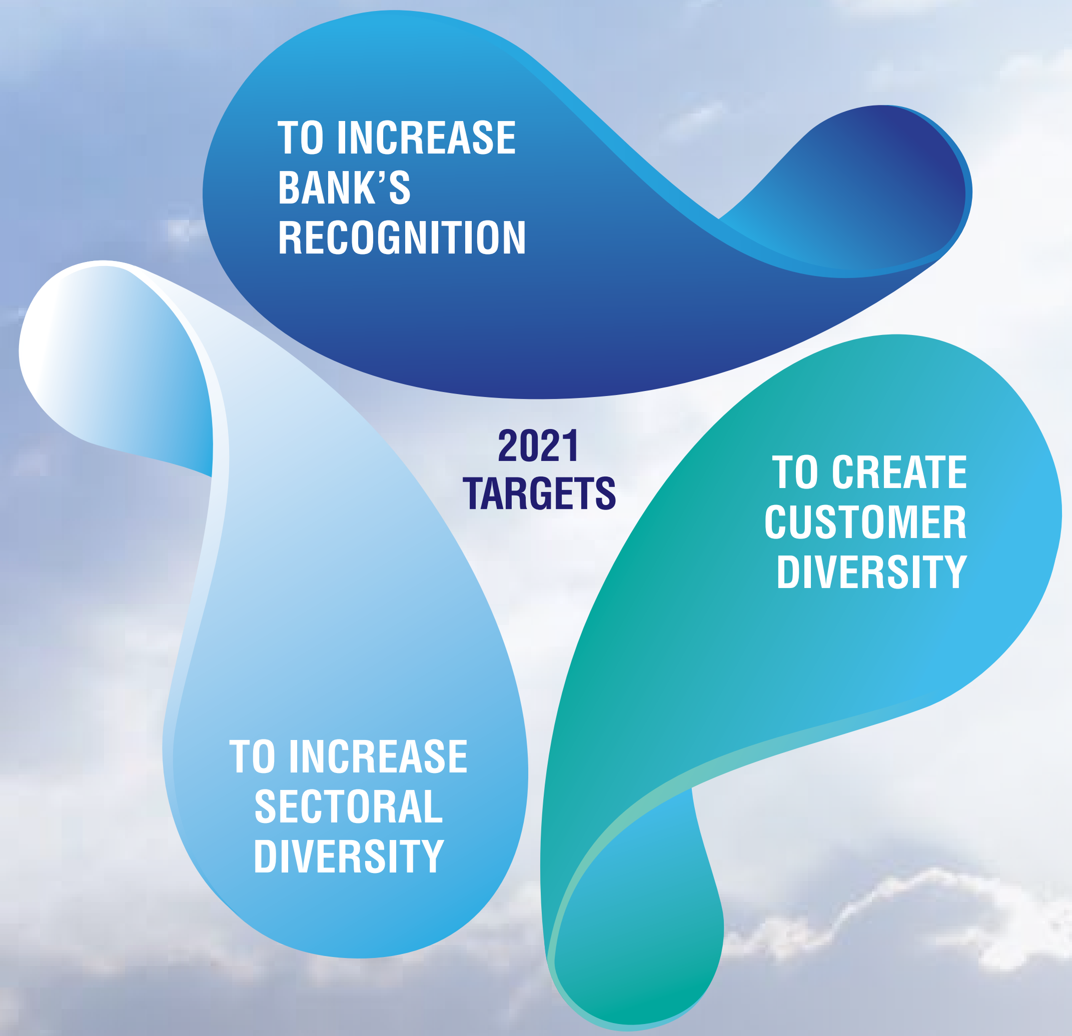
- They are identified as the inclusion of companies operating in the commercial customer segment into our banking portfolio in addition to Corporate Banking, thus increasing the sectoral diversity,

- Increasing both interest and commission income by creating synergy through intermediation of private sector bond issuance,

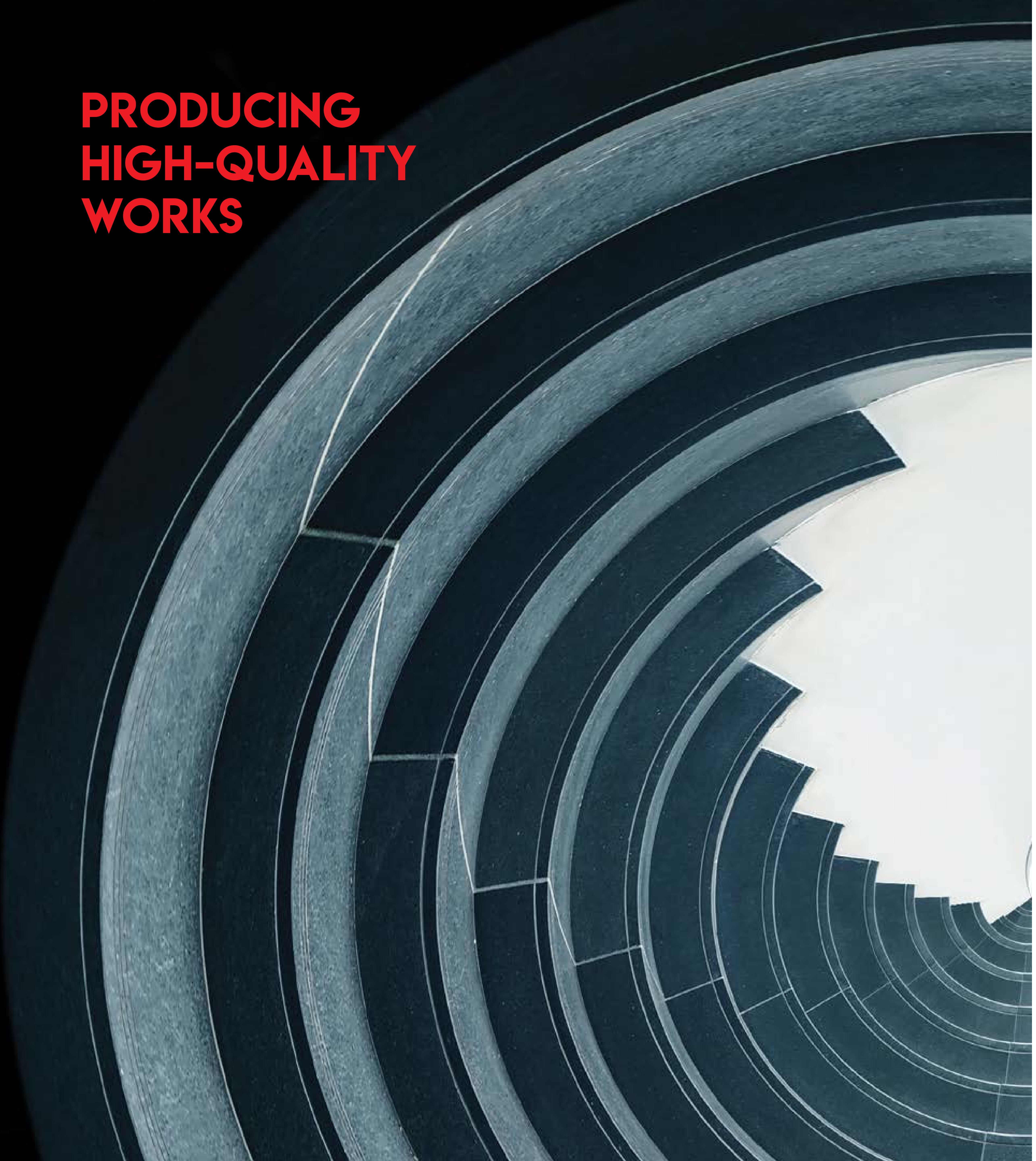
- Ensuring customer diversity and developing new products and services based on well identification of customer needs,

- Strengthening the resource structure by issuing debt instruments at various maturities

With these goals, we aim to observe in-group and non-group customer balance constantly and take precautions towards increasing its productivity, ensure the efficient use of the sources which will be created through our bank's equity security/bond issuances, continue the efforts of increasing the recognition of the bank, and pursue all of these within the frame of an approach involving a systematic risk analysis and control.



PRODUCING HIGH-QUALITY WORKS



OUR BANKING SERVICES

Treasury

Treasury Department is responsible for fulfilling its obligations against the supervisory and regulatory institutions such as Central Bank of Turkey, Council of Bank Audit and Regulation and Capital Markets Board, and managing the liquidity and balance sheet of our Bank. Fulfilling our promises on time in full thanks to our knowledge and experience in the field of treasury services, ensuring the liquidity by taking the growth and strategies into account, diversifying our balance sheet, finding alternative investment channels, diversifying and minimizing our risks, increasing our revenues by reducing costs, following the additional obligations and legal ratios are among our main objectives.

2020 was a year in which significant volume increases took place in important fields of activity for Treasury Department as it was in 2019. In line with the developments in the markets during the year, our Department has ensured taking necessary precautions without having liquidity problems thanks to correct timing, providing fast information flow and market information to the customers from the first hand besides taking necessary changes and precautions in terms of the Bank's position with the help of its experienced and expert staff. In 2020, the Treasury Department of Nurol Yatırım Bankası successfully achieved sustainable profitability by increasing efficiency.

In 2021, it shall continue to take its product range beyond existing treasury products for the purpose of contributing to the profitability and effectiveness of the Bank, to provide necessary information flow through market analysis by effectively managing market, exchange rate, interest, liquidity and operational risks, and to continue to support its customers on the prices and types of products.

In 2021, we will continue to make a difference with our expert staff and innovative approach.

Private Banking

Investment Funds, Private Sector Bonds, Treasury Bills, and Government Bonds, Eurobonds, Structured Transactions and Derivative Products.. The funding facility provided by Nurolbank's Private Banking division has reached a total size of 3.2 billion TL together with 8 portfolio managers as of the end of 2020. Nurolbank Private Banking demonstrated a strong performance with accurate and continuous customer communication, and a product range that takes into account the needs and expectations of its customers. Despite the Covid-19 pandemic experienced in 2020, new customers continued to be gained with customer-oriented and holistic service management. Our portfolio managers, who are experts in their fields, provide special services to our customers in line with the risk perceptions of our customers and in accordance with the market conditions.

In 2021, Nurolbank Private Banking will continue to expand its team in line with the bank's goals, to digitalize to increase efficiency, to offer innovative products to diversify its portfolio, and to expand its customer base.

BANKING SERVICES

Corporate Finance

Nurolbank offers corporate finance consultancy services with its strong and qualified team for finding financing solutions for domestic and foreign companies to benefit from the capital and loan market in maximum, for mergers and acquisitions, intermediation for public offering, financial restructuring and privatization projects.

Corporate finance team provides six main services:

1. Financial restructuring
2. Intermediation for public offering
3. Acquisitions and mergers
4. Privatization consultancy
5. Financial and/or strategic partner
6. Investment like private equity

Our Bank has the opportunity to closely follow so many companies and sectors in Turkey with its loan customers portfolio. A significant knowledge has been created up to now thanks to the significant activities carried out both by our bank and the group, and the relations established with the foreign and domestic companies during these activities. This knowledge and experience have increased the ability of Nurolbank to absorb different needs of each customer and to create customer specific solutions, and allowed our bank to have an exclusive place in investment banking in Turkey.

It also provides consultancy services for the real estate investment trusts with the knowledge and experience created by the group experience in the real estate sector, which is growing rapidly depending on the development of Turkish economy and the increase in capital accumulation.

It is aimed in 2020 to identify the growing companies within the scope of the sectors we determined, to provide acquisition and merger consultancy for the potential companies under M&A through our foreign connections, to mediate companies which need financing in finding financial partners, to offer low risk resources with financing products reconstructed according to the financial needs of these companies and to contribute to the return on assets of our bank.

BANKING SERVICES

Financial Institutions and Investor Relations

Department of Financial Institutions and Investor Affairs carries out debt instrument issuances of the Bank through Capital Markets which enable better recognition of the Bank in national and international markets by larger masses, conducting relations of Nurol Yatırım Bankası with domestic and foreign banks and institutions through correspondent relations developed in line with the operations performed by the Treasury Department, and contacting with new institutions and organizations toward the needs that will arise. In 2020, a total of 2.6 Billion TL borrowing was realized through the issuance of 38 separate debt instruments. Among the issues, there are bonds and financing bills, which are conventional capital market setting tools, as well as a lease certificate, a product of Islamic Banking. Our bank enables its customers to use the funds provided by the lease certificates issued, again with Islamic banking financing products. Within the scope of interest-free banking activities, our bank is audited by the ISFA Advisory Committee and provides consultancy services from the ISFA Islamic Finance Consultancy team.

In 2020, the Department of Treasury and Financial Institutions contributed to the increase in transaction volumes by expanding the number of existing correspondents despite the difficult global conditions. Cash and non-cash limits for beneficiaries were increased, and a variety of beneficiaries was created in foreign trade financing and funding obtained from foreign markets. In parallel with the Bank's developing foreign trade and treasury transaction volumes, accounts were opened in new foreign currencies and the product range offered to customers was expanded. As of the end of 2020, the amount of funds obtained from foreign and domestic financial institutions reached to 1,120 Million TL and constituted an important position in the liability items of the bank.

Project Finance and Business Development

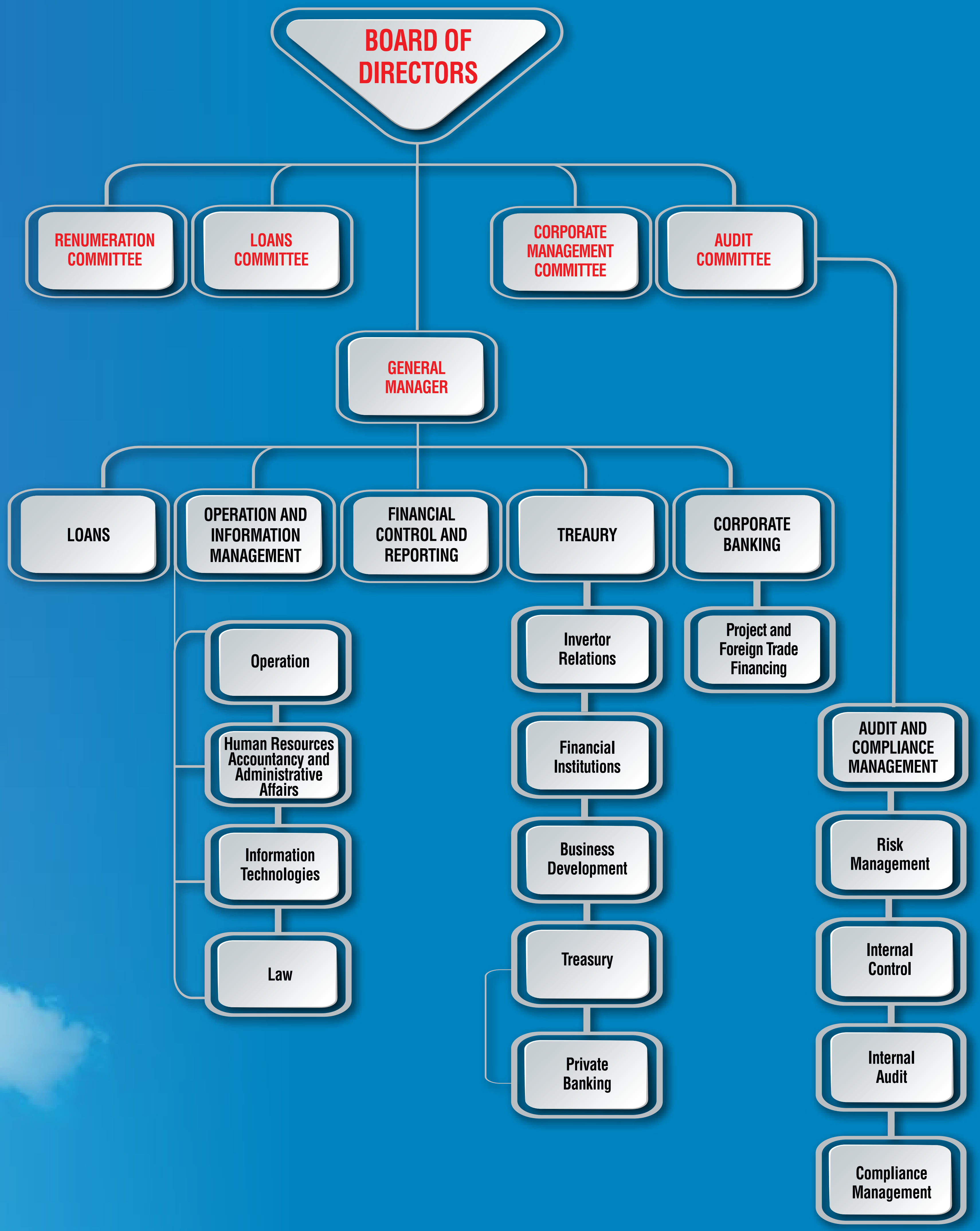
The main objective of Investment Banking is to identify the needs of corporate and commercial customers and to create "tailormade" solutions appropriate to their requests, demands and structures. As a bank and a group, primarily, project conformity analyzes are carried out in basic infrastructure projects and the areas of transportation, energy and telecommunication with the experience and knowledge gained and consultancy services are provided on the issues of providing strategic/financial partners, reconstructed finance and project finance by supporting the projects.

Nurolbank has the equipment and teams that could play a key role in every stage of a sound and efficient project and offers different products ranging from the provision of medium and long term financing to bridging loans.

Research and development practices related to the new services and activities

There are no research and development studies related to the new services and activities during the period.

ORGANIZATIONAL CHART OF NUROL YATIRIM BANKASI ANONİM SİRKETİ

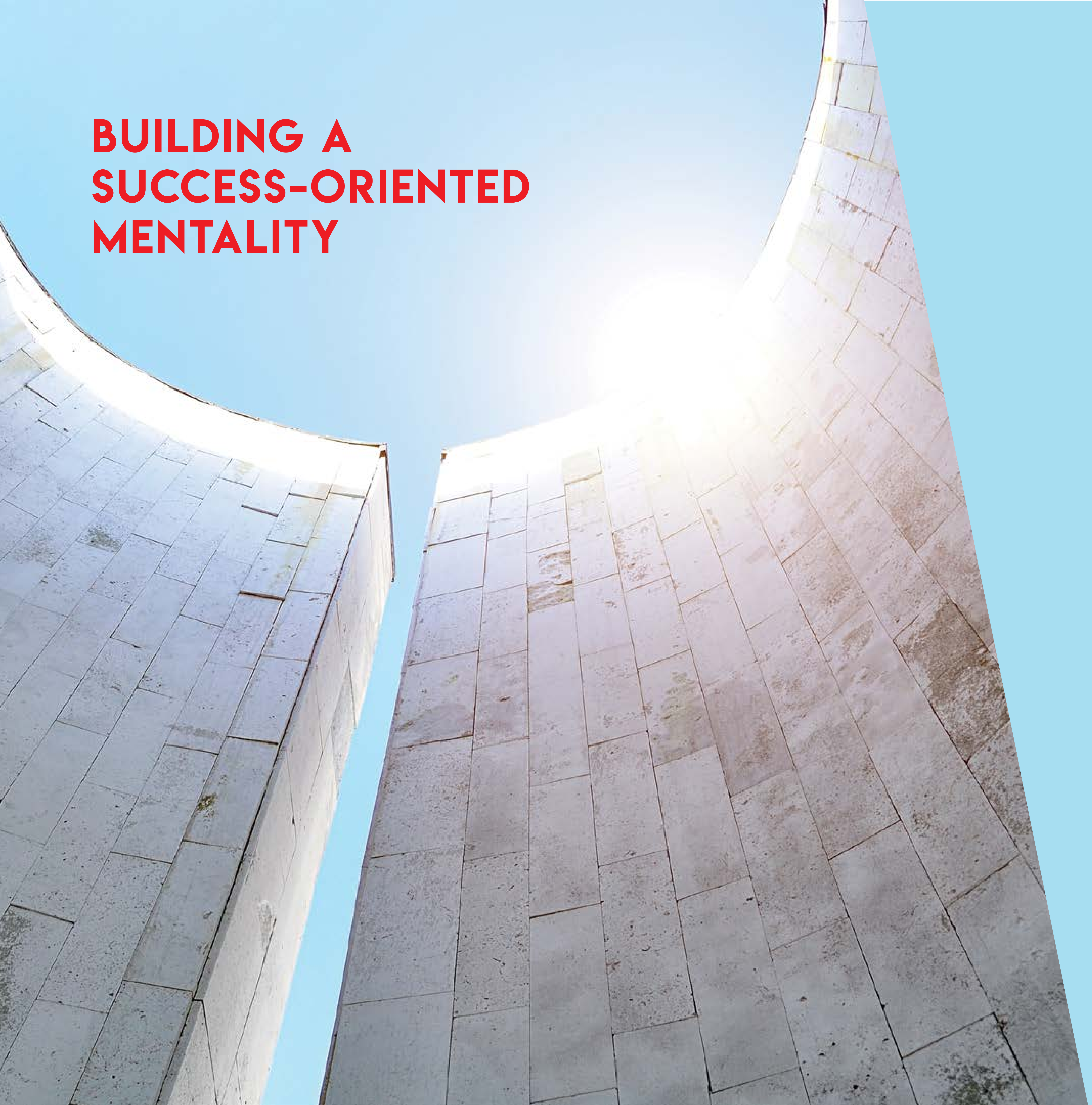


NURŌL HOLDING MILESTONES

- **1966** Nurol İnşaat
- **1971** Nurol Enerji
- **1976** Nurol Makina
- **1983** Nurol Teknoloji
- **1987** Nurol Turizm
- **1988** FNSS
- **1997** Nurol GYO
- **1999** Nurolbank
- **2004** İstanbul Marmaray 1.5 billion USD project
- **2010** Otoyol Yatırım İşletme A.Ş.
  9 bilion USD Gebze İzmir Highway and İzmit Gulf bridge project
  292 million USD purchase; 1 billion USD sales in 2006

FINANCIAL INDICATORS

BUILDING A SUCCESS-ORIENTED MENTALITY



RATING NOTE OF THE CREDIT RATING INSTITUTION

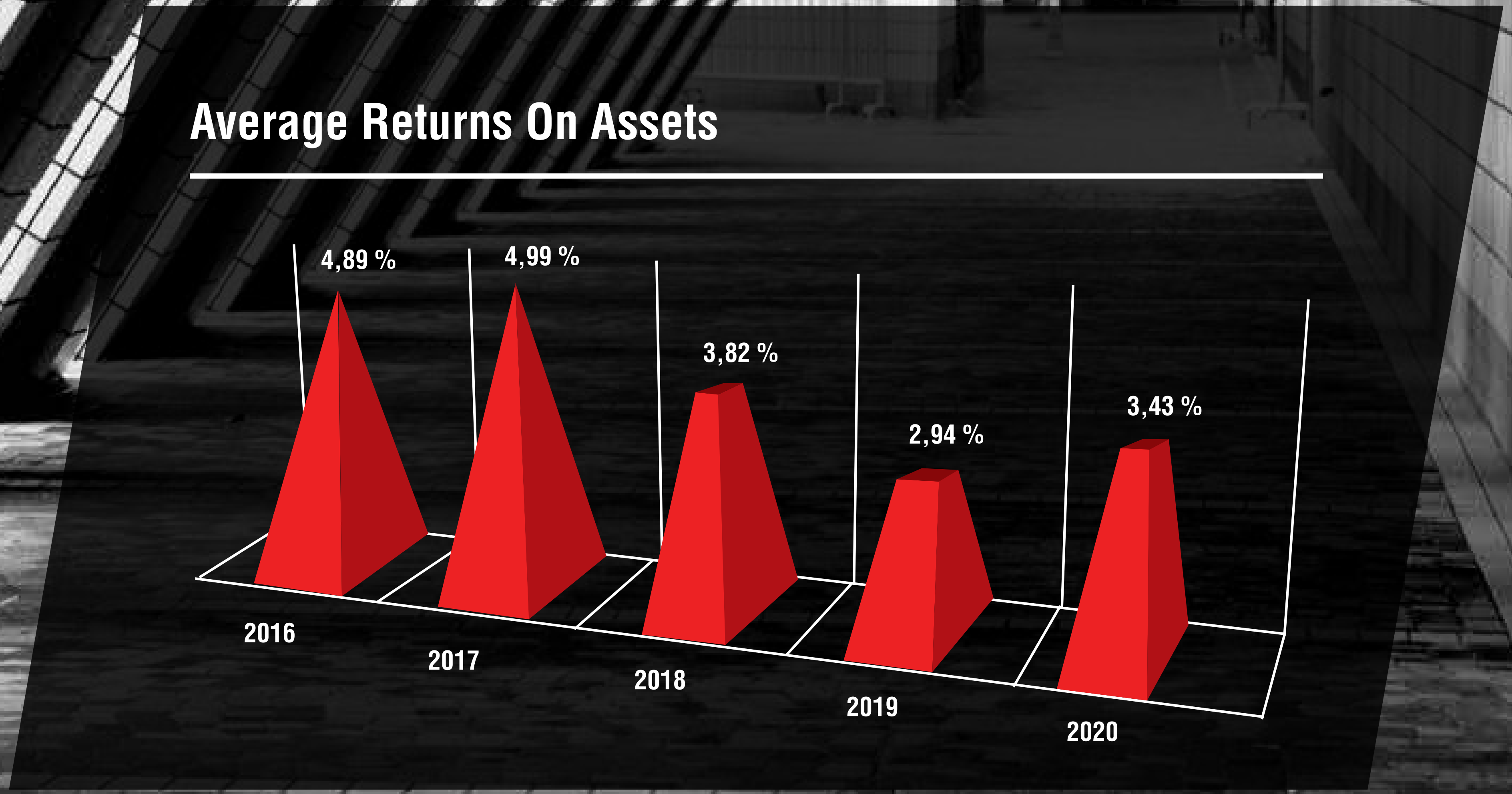
JCR Eurasia Rating assessed "Nurol Yatırım Bankas I A.Ş." within the category suitable for investment at national level during the periodical review process, and confirmed its Long-Term National Grade as 'AA (Trk)', and the Short-Term National Grade as 'A-1 (Trk)' and "Stable" outlook. On the other hand, it confirmed its Long-Term International Currency Grade as 'BBB-'.

Nurol Yatırım Bankası A.Ş.'s desire to be supported by its partners and the level of financial power of the partners and its rating in the independence category regarding the ability to manage the risks assumed by the Bank on its own basis were determined as (AB). The (AB) rating in the independence category indicates the "High" level in the notation system of JCR Eurasia Rating, while the rating in the support category indicates that the possibility of external support is at the "High" level.

NOTES

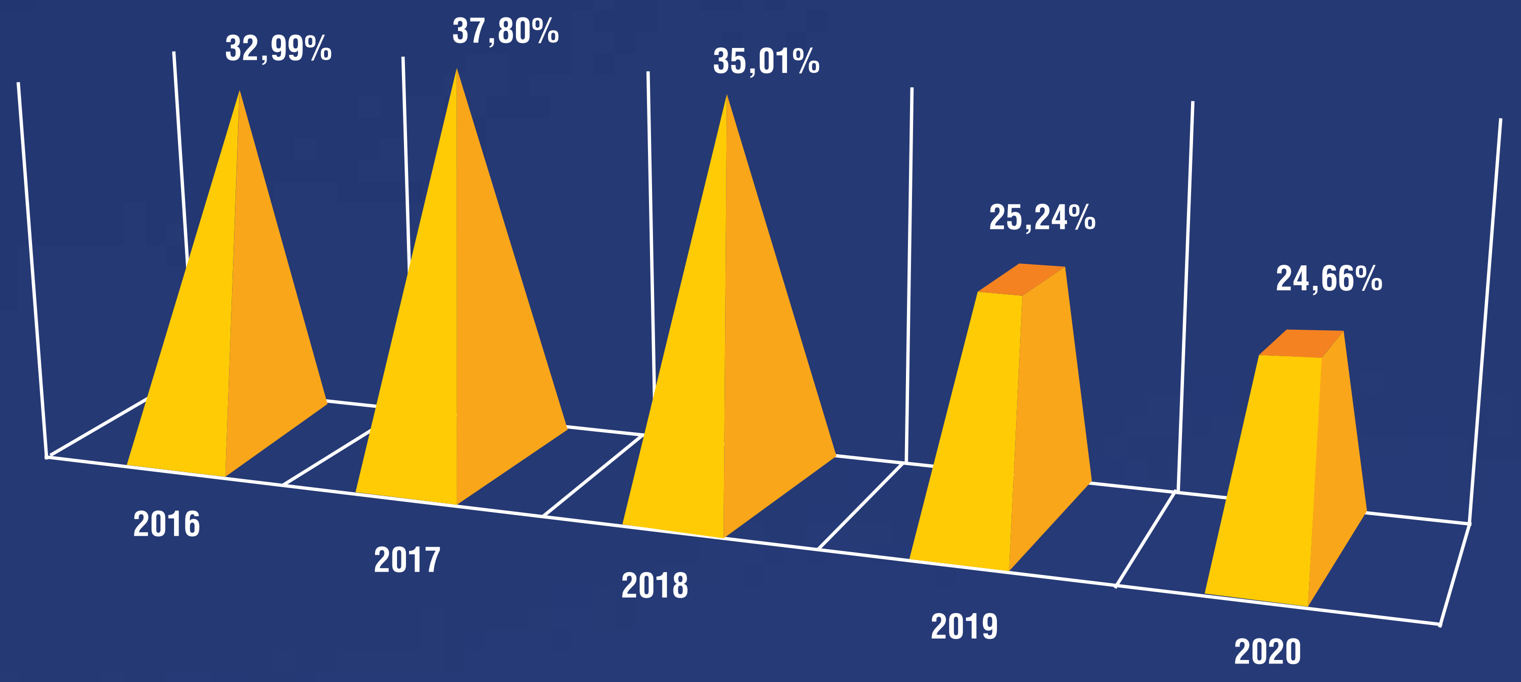
			Long-term	Short-term
International	Foreign currency		BBB-	A-3
	Turkish Lira		BBB	A-3
	Appearance	YP	Negative	Negative
		TP	Negative	Negative
	Export Grade		-	-
National	National Grade		AA(Trk)	A-1(Trk)
	Appearance		Stable	Stable
	Export Grade		AA(Trk)	A-1(Trk)
Supporting note			1	-
Independency note from the partners			A B	-

DEVELOPING STABLE STRUCTURES



PROVIDING A STRONG SUPPORT

Average Return On Equity



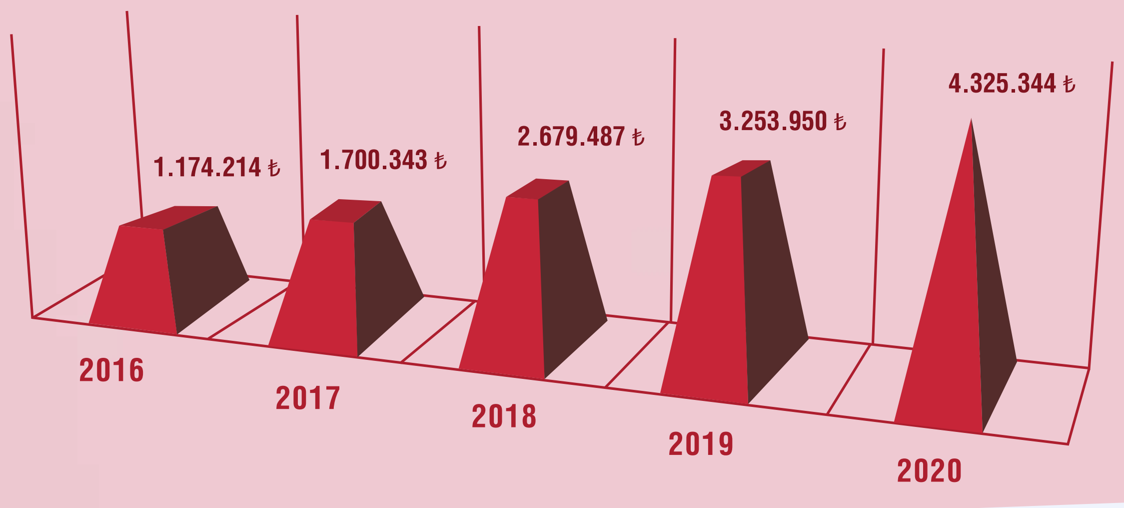
Comparative Capital Sufficiency Ratios

SECTOR		NUROLBANK
18,76%	2020	17,10%
18,40%	2019	15,64%
17,27%	2018	15,24%
16,87%	2017	18,05%
15,57%	2016	17,34%

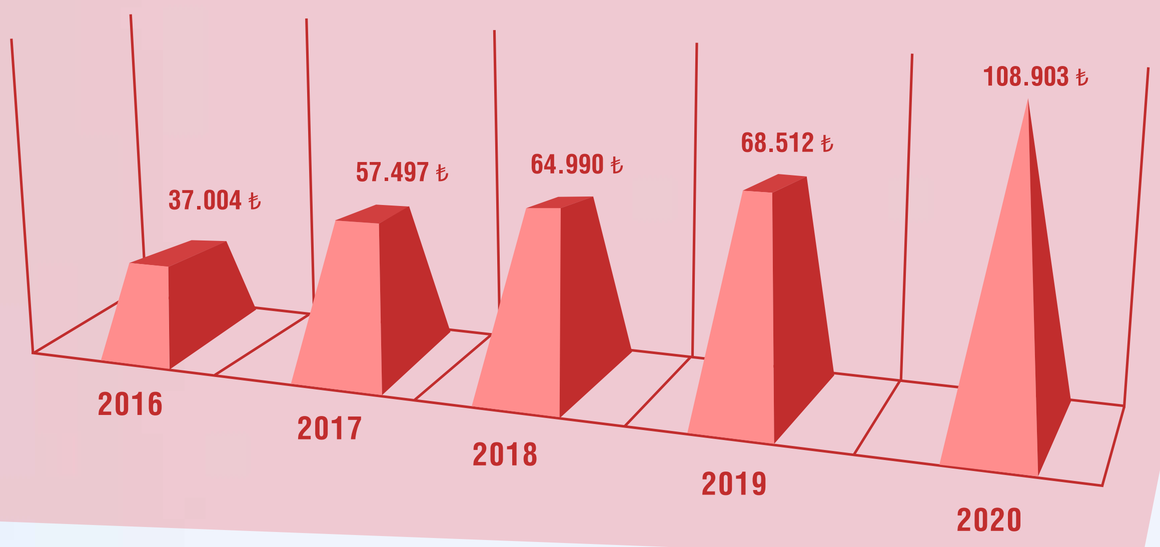
BUILDING A MULTI-FACETED TRUST

REACHING SUCCESS WITH THE RIGHT PERSPECTIVE

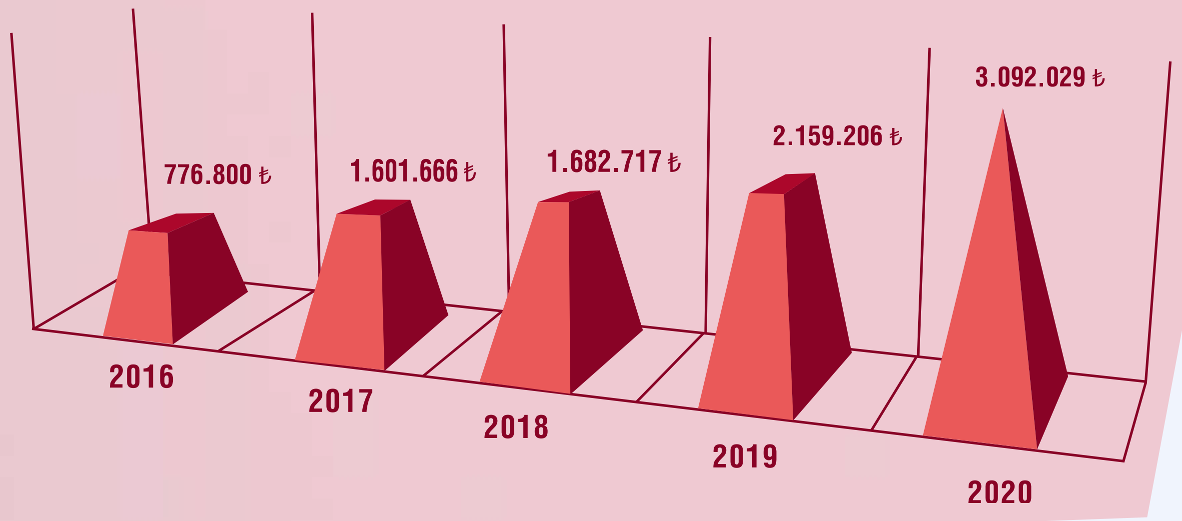
Total Assets (Thousand TL)



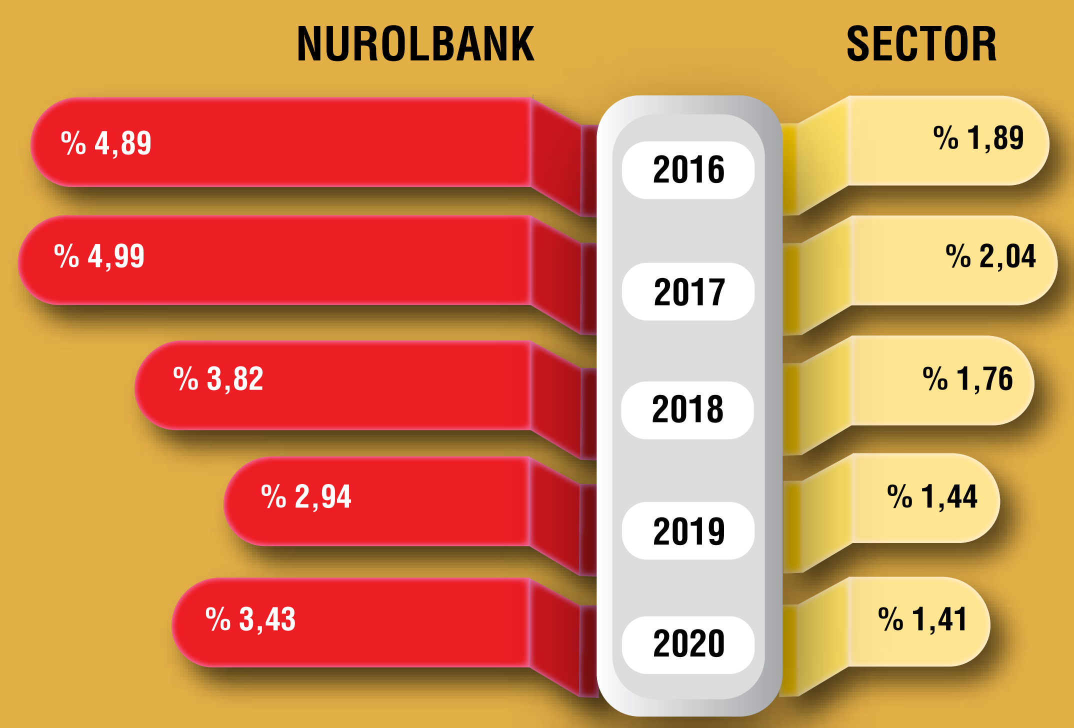
Net Profit (Thousand TL)



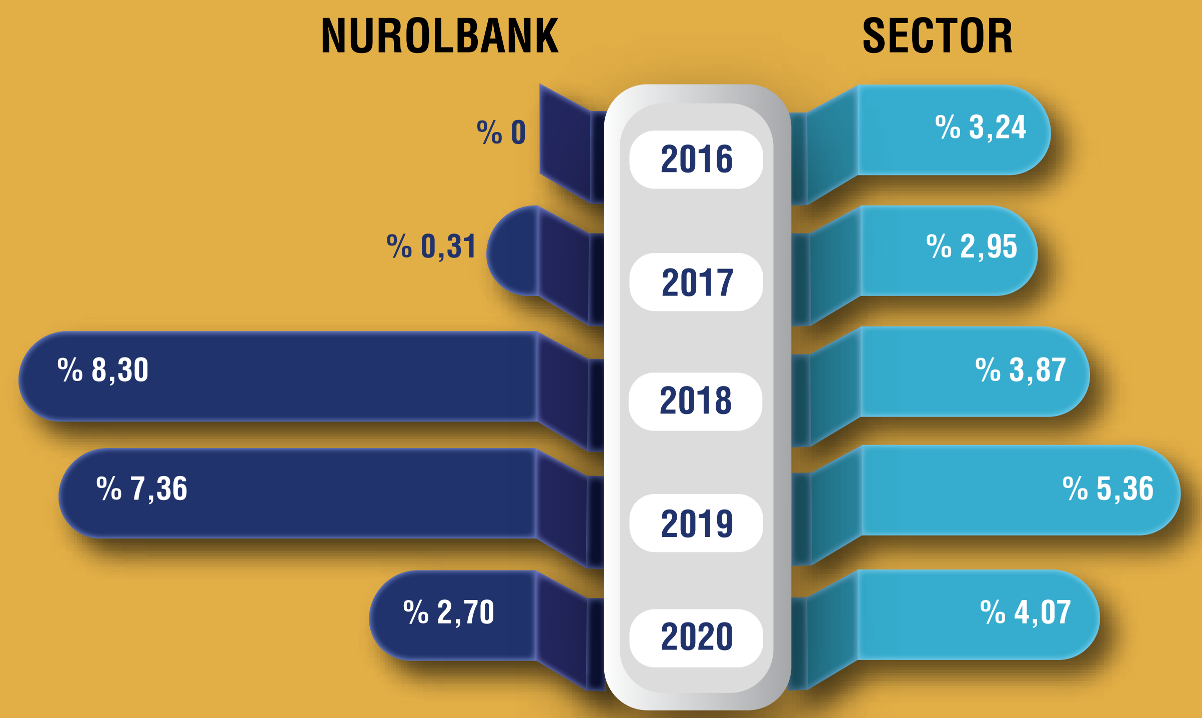
Total Cash Loans (Thousand TL)



Comparative Average Return On Assets (Per Profit Before Tax)

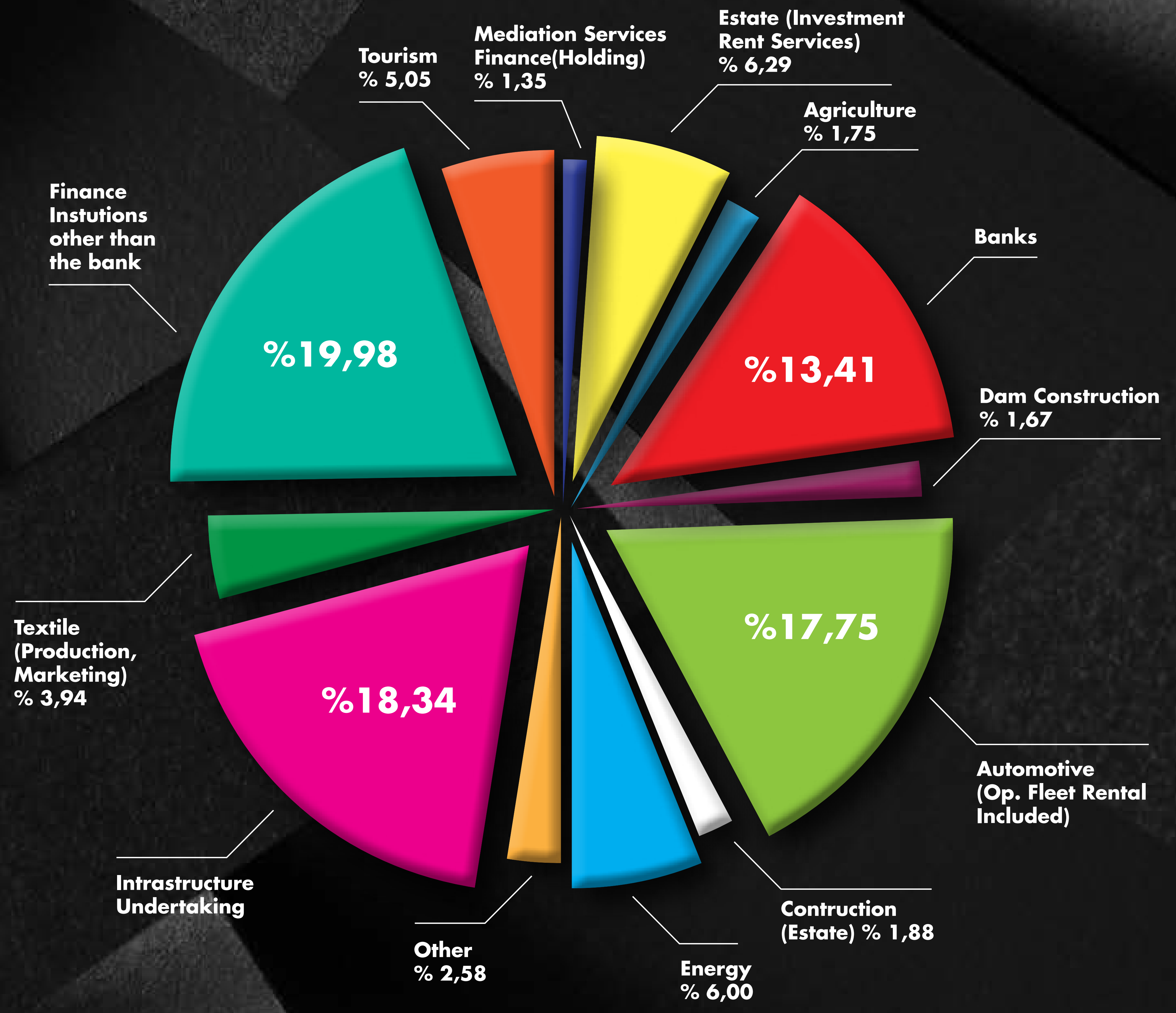


Comparative Non-performing Loans Ratio



TO ANALYSE IN DETAIL

SECTORAL BREAKDOWN RATIO OF TOTAL RISKS



NUROLBANK ACTIVITIES AND POSITION IN THE SECTOR IN 2020

1 Total Assets of our bank is 4.325 million TL as of 31 December 2020.

2 Cash loans consist of 71% of the total actives with an amount of 3.092 million TL.

3 As of the end of 2020, the paid-up capital of our Bank is 360 million TL and our equity capital is 618,990 million TL.

4 As of the end of 2019, total cash loans portfolio with an amount 2.159 million TL showed 43 percent increase as of the end of 2019 and increased to 3.092 million TL.

5 Total cash and non-cash loan portfolio is 3.968 million TL. Portion of 1.378 million TL (35%) is from the foreign currency and 2.590 million TL (65%) is from Turkish Lira loans.

6 As of 2020, 3.092 million (78%) of our loan portfolio is constituted by cash loan risks and 87 million TL (22%) is constituted by non-cash loan risks.

7 While the capital adequacy ratio was 15.64% at the end of 2019, this ratio has become 17.1% in 2020.

8 Our bank continued issuing Capital Market debt instruments in 2020. We have issued a total of 2.590 million TL debt instruments.

Subsidiaries

Nurol Varlık Kiralama A.Ş., as a subsidiary of Nurol Investment bank A.Ş, is founded on 14.06.2017. The company closed the year 2020 with 685 TL profit. Total actives is 151.3 Million TL and the corresponding equity is about 50.685 TL.

Nurol Portföy Yönetim Şirketi A.Ş., as a subsidiary of our bank, has founded on 18.11.2020.

FINANCIAL INDICATORS

KEY FINANCIAL INDICATORS

(Thousand TL)	31.12.2020	31.12.2019	31.12.2018	31.12.2017	31.12.2016
Total Assets	4.325.344	3.253.950	2.679.487	1.700.343	1.174.214
Banks and Other Financial İnstitutions	389.061	472.460	82.382	23.230	93.541
Securities	321.953	198.356	80.530	136.519	45.514
Total Loans (Cash)	3.092.029	2.159.206	1.682.717	1.061.666	776.800
Total Loans (Non-cash)	876.516	925.853	794.799	606.437	542.776
Issued securities	722.790	763.268	736.306	638.849	525.853
Credits received	366.584	389.010	442.010	211.857	150.163
Funds accepted by Development and Investment Banks	681.200	483.506	373.054	190.564	9.970
Shareholders Equity	113.214	90.305	80.254	57.267	53.364
Profit / Lose Before Tax	618.990	436.342	254.711	221.893	157.941
Pre-tax profit/loss	130.120	87.205	83.435	71.792	46.305
Net Profit/Loss	108.903	68.512	64.990	57.497	37.004

PERFORMANCE RATIOS

Ratios (%)	31.12.2020	31.12.2019	31.12.2018	31.12.2017	31.12.2016
Capital Adequacy Standard ratio	%17,1	%15,64	%15,24	%18,05	%17,34
Average Equity Profitability (Pre-tax profit)	%24,66	%25,24	%35,01	%37,80	%32,99
Average Assets Profitability (Pre-tax profit)	%3,43	%2,94	%3,82	%4,99	%4,89
Intangible assets/Equities	%53,74	%84,78	%74,90	%3,68	%15,06
Intangible assets/Total actives	%7,69	%11,37	%7,12	%0,48	%2,03
Yield Assets/Total Assets	%85,37	%83,90	%63,28	%71,93	%81,83
Loans/Total Assets	%71,49	%66,36	%62,80	%62,44	%66,15

OUR OPINIONS ABOUT THE WORLD AND TURKISH ECONOMY

MESSAGE FROM THE CHAIRMAN OF THE BOARD

Dear valued stakeholders, business partners and employees,

The year we left behind has been an extremely difficult year for both the world economy and our country. The world economy has experienced its deepest recession since the Second World War due to the coronavirus pandemic.

Due to the pandemic, countries have taken various restrictions and lockdown measures to prevent the pandemic from spreading further. While protectionist measures have increased globally, both governments and central banks have tried to mitigate the effects of the crisis with expansionary fiscal and monetary policies to combat the crisis.

The successful performance of vaccination studies during the pandemic process and the achievement of satisfactory levels of efficiency make us hopeful for 2021, but the fact that the vaccine supply process is not distributed evenly across the world and the virus mutates also supports our cautious stance.

One of the most important agenda items of the last year was the US presidential elections. 46th president of USA was elected as Joe Biden. The "Blue Wave" scenario, in which the control of the administration, the Senate, and the House of Representatives passed to the Democrats, was realized. Biden's economic program includes a strategy focusing on structural reforms. Infrastructure investments aim to revive the economy supported by fiscal policy in the fields of education, health, and clean energy. Although this structure, which is under the control of the Democrats in a political sense, is welcomed in terms of decision-making processes, the expectation that expansionary fiscal policies will create a burden on the budget deficits in the USA and this will put pressure on US interest rates will be one of the most important issues of the next year.

China, shown as the starting point of the Covid-19 pandemic, has been one of the best performing countries this year, and its successful steps taken both politically and economically reinforced this positive picture. During the crisis period, the past experiences of Asian countries in combating the pandemic, the ability to respond immediately to changes in demand conditions and a strong export structure are among the factors that bring China forward in its competition with the USA this year.

One of the most important developments of 2020, although brushed over, has been the signing of the world's largest free trade agreement. The Regional Comprehensive Economic Partnership Agreement (RCEP) was signed by 15 countries in the Asia Pacific region, including China. With this move, China responded to the phenomenon that turned into a trade war with China during the Trump era. Thus, China has entered a trade block for the first time. The withdrawal of USA from the Trans-Pacific Partnership Agreement was also effective in signing of this agreement. With this agreement, it is aimed to gradually reduce the customs duties among the member countries, which are used by other countries in protectionist measures, to facilitate trade, and to remove non-tariff barriers. It will be an important step for China to reach its goal within the scope of the "One Belt, One Road" project.

For the European Union, the development differences between countries, the fact that more than 20% of the population is 65 years old and above, the heterogeneous structure of the health and infrastructure systems have been the most important obstacles in achieving the success of being affected by the crisis process and acting jointly against the crisis. Although the European Commission expects the Euro Zone to contract in the range of 7-8% in 2020, it predicts the growth expectation for 2021 as 4.2%. For EU, the most important development of 2021 will be the general elections to be held in Germany. The success of Prime Minister Merkel in the pandemic process and the economic capabilities of her party enjoy great support throughout the country. The fact that Merkel will not be a candidate again next year carries great uncertainty in terms of the political and economic future of the EU.

In terms of Turkey's economy, we have left a year having a dynamic and a busy agenda. Although we made a good start in 2020, the Covid-19 pandemic had negative effects on the macro balances of the economy. Our country has gone through a period of increased risk premium, decreased growth rates, increased dollarization trend and increased inflation. We think that the inflation problem, which has been ongoing for years with CPI closing the year at 14.60%, should be at the top of the issues that need to be focused on in the next year. The change in economic management at the beginning of November was welcomed by market players, and investors' views on Turkish financial investment instruments were positively improved. The fact that the transition to orthodox monetary policy and the fight against inflation has been placed in the first place makes us look at 2021 more positively.

In 2021, we consider that domestic consumption will be one of the main factors of growth despite the increases in interest rates and net exports will support this with the global recovery. We expect TL to follow a more stable course as a result of the successful steps taken by the Central Bank, and the recovery in tourism revenues and the decrease in net gold imports will ensure the recovery in the current account balance. We anticipate that inflation will rise until April-May due to the base effect and will drop in the second half of the year, closing the year 2021 in low double digits.

Within the general perspective, a very difficult year awaits us both in terms of our country and global economies. The young and dynamic structure of our country, its geo-strategic position and importance in the world, and the strong structure of the banking sector are among the most important advantages of our country. Nurolbank will continue its steady growth by acting with the aim of managing this challenging process in the most efficient way in the light of past experiences.

I would like to thank all our financial partners for their support and trust in Nurolbank, and all our employees who did not spare their efforts in this difficult year, on behalf of myself, as well as the Board of Directors and our shareholders, and I present my respects with my wishes of success.

Ziya Akkurt
Chairman of the Board of Directors

MESSAGE FROM THE GENERAL MANAGER

Dear Shareholders, Customers, Employees and Business Partners of Nurolbank,

The year 2020, which we left behind, has been a memorable year. The Covid-19 pandemic process, which has affected the whole world, the presidential elections in the USA, the ongoing disputes between the USA and China, Brexit and its effects, the geopolitical developments in our geography have been determinants in the economy. Although there were serious losses in asset classes for the past year, due to the Covid-19 pandemic, effects of low interest environment, expansionary liquidity policy and central banks interest subsidies, asset classes closed the year close to the peaks as the news of worldwide vaccination begun. In 2020, Nurolbank continued to grow by taking innovative steps towards digitalization by preserving its strong balance sheet structure and profitability.

Nurolbank increased its loan size to 3.092 billion TL, of which 3.968 million TL was in cash and our profit before tax increased by 59 percent compared to the previous year and reached 109 million TL. According to the data of our bank as of December 31, 2020, the Capital Adequacy Ratio was 17.10 percent and the return on equity ratio was 24.66 percent. In addition, our Bank issued debt instruments amounting to a total of 2,590 million TL during the year at competitive prices.

In 2020, Nurolbank established a portfolio management company titled Nurol Portföy Yönetimi A.Ş., with an initial capital of 3 million TL, within the registered equity ceiling of 15 million TL, of which it owns 100 percent of the shares. In 2021, our new subsidiary will embark on a new path, where it will try to create customer satisfaction by providing professional portfolio management services, providing sustainable returns to our customers in line with their risk preferences. In addition, Nurolbank has 100 percent of the shares of Ortak Varlık Yönetimi A.Ş. It has obtained permission from the BRSA for the establishment and operation of an asset management company, and our new subsidiary will start its operations in 2021.

Nurolbank, on the other hand, will continue to grow along with its strong shareholder support, competent management team, energetic, high potential and expert employees. Concentrating on new projects with our strong liquidity and capital structure, and with our flexible structure that can produce instant solutions, we will continue to meet the expectations of our customers at the highest level in the coming year. I firmly believe that our creative solutions and diverse thinking will bring us success in the coming year, by finding simple and fast solutions independent of time and space, breaking the ground. I am once again looking forward to working with such a passionate, ambitious, creative group who aspire to provide our clients with fast, flexible solutions and continue our business approach ‘Customer First’.

We would like to thank our investors, employees and all our stakeholders for their support and contribution. We will continue to create value for our investors by maintaining our successful performance with our strong corporate governance approach in line with our current strategies in the upcoming period.

Kindly regards,

Özgür Altuntaş
Board Member and General Manager

GLOBAL ECONOMICAL ASSESSMENT

In 2020, the world economy had to struggle with the biggest crisis it had experienced after World War II. The global pandemic has affected the whole world, causing a decrease in global economic growth, an increase in unemployment rates and a reengagement of protectionist measures by countries.

Supportive fiscal policies of governments in combating the Covid-19 pandemic, expansionary monetary policies of central banks of developed and developing countries, further acceleration of the vaccine supply and distribution process make us look at the global economy more positively for 2021.

The FED did not make any changes at the December meeting and kept the policy interest rates as unchanged in the range of 0-0.25%. The fact that FED chairman Jerome Powell emphasized the need for more support to the economy, stated that the current policy stance will continue in the next year, stated that they will not increase interest rates until they see that inflation reaches 2% and remains above it is seen as a positive step to support the global risk appetite for 2021.

We consider the end of the election uncertainty in the USA and the realization of the “Blue Wave” scenario, which is shown as a positive scenario for global financial markets, as a positive development for global markets in 2021. The steps to be taken by the Biden administration in order to stimulate the economy with fiscal stimulus packages will be important for the recovery of growth. FED revised its growth forecast for 2021 upwards to 4.2%.

As the World Bank states that the global economy will shrink by 4.3% in 2020 and that it is expected to grow by 4% in 2021, the OECD has predicted the growth forecast for 2021 as 4.2%. IMF’s global economy growth forecast for 2021 was 5.2%.

China, shown as the starting point of the COVID-19 pandemic, closed 2020 with a growth of 2.3% and ranked among the countries least affected by the crisis. While the priority initiation of the lockdown process and restrictions compared to other countries supported this process, it was able to turn the pandemic in its favor by taking rapid action against changing demand conditions and its strong export performance. According to the 2021 projections of the World Bank, the Chinese economy is expected to grow by 7.9%.

GLOBAL ECONOMICAL ASSESSMENT

The European Union, which is among the blocks most affected by the global epidemic, has had to implement quarantine measures more harshly and comprehensively from the beginning, and the heterogeneous structure between countries has caused the effects of the crisis to be felt more. The European Commission updated its 2020 Euro zone growth forecast as -7.8% and -7.4% for the EU. The Euro Zone has reduced its 2021 growth forecast to 4.2% and to 4.1% for the EU.

As in 2020, we expect to have precious metals have a positive year in 2021. According to the IMF, governments and central banks have put $12 trillion into the market to avoid the effects of the global pandemic. Expansionary monetary and fiscal policies will continue to be seen as a hedging tool as they increase inflation expectations. Especially the positive growth expectations, the rise in the indebtedness levels of the countries to historical levels and the expectation that real interest rates will remain low for a long time support this view. Gold closed 2020 at $ 1,896 with an increase of 25%. The 2021 consensus expectation is expected to be $2,300, while the expectation for Silver is expected to be $30.

The barrel price of Brent crude oil followed a fluctuating course in 2020. It reduced to $18 in April. As a result of the negative consequences of the pandemic, the increase in oil stocks along with the decrease in the demand amount accelerated this process. The global expansion of the vaccination process in 2021, the upward revision of global economies' growth and the unilateral cutting of production by Saudi Arabia independent of OPEC+ countries will support the increase in prices.

TURKISH ECONOMY

In 2020, Turkey's economy experienced the effects of a global pandemic deeply, like other countries in the world. The effects of the crisis were successfully mitigated by the strong healthcare system and timely lockdowns. It is expected to be one of the rare countries that will close the year with positive growth thanks to the government's supportive incentive program and expansionary fiscal policies.

With the change in economic management at the beginning of November, the fact that economic policies are more transparent, predictable, and guiding, was welcomed by the markets. The transition of CBRT to orthodox monetary policy and its emphasis on tight monetary policy in line with its goal of combating inflation made 2021 look more positive.

CBRT increased the policy rate by 200 basis points from 15.00% to 17.00% at the meeting conducted on December 24. At the beginning of November, it further strengthened the tight monetary policy discourse. The most important factors that can change the stance of CBRT in its tight monetary policy in the forthcoming days will be food prices and the change in our real interest rates compared to developing countries.

In 2020, the CBRT's OMO portfolio nominal size increased to 79.9 billion TL due to the fight against the pandemic. According to the CBRT's Monetary and Exchange Rate Policy Report, it is predicted that in 2021, in line with the tight monetary stance, new bond purchases will not be made to replace the redemption of 16.1 billion TL due this year, and the CBRT OMO portfolio size will not exceed the maximum nominal level of 64 billion TL.

After the change in economic policies, the foreign share in the bond market is expected to increase gradually. The share of foreigners in the bond market, which was 11.7% at the end of 2019, decreased to 3.7% at the end of October 2020, and increased to 5.7% as of December 25. In case the inflation expectations improve and correct policies are implemented, the financing program is expected to relax.

In December 2020, the CPI increased by 1.25% when compared to the previous month and closed the year at 14.60%. In the struggle with the epidemic, due to the increasing domestic demand through the credit channel, the high course of food prices and the depreciation in TL, the exchange rate pass-through caused the inflation to be higher than expected.

TURKISH ECONOMY

The number of unemployed people, who are 15 and older, became 4 million 5 thousand people in October 2020 in Turkey decreasing by 391 thousand when compared to the same period last year October period in 2019. Unemployment rate realized as 12.7% with a decrease of 0.7 points. Non-agricultural unemployment rate decreased by 0.9 points to 14.8%.

While the central government budget had a deficit of 124 billion 747 million TL in January-December 2019, this figure was realized as 172 billion 743 million in the January-December period of 2020. The 2020 budget balance was found positive when compared to the forecast of 239 billion TL deficit that is foreseen in the new economic program target. Despite the negative effects of the pandemic, the strong domestic demand had a positive effect on this figure, while the special consumption tax and VAT on imported products enabled a strong increase in tax revenues due to the strong domestic demand.

2020 has been a challenging year for the balance of payments. In the first eleven months of the year, the current account deficit was 35,249 million US dollars. The decrease in the tourism revenues and the increase in net gold imports, negatively affected by the pandemic, were effective in the increase in the current account deficit. Net gold importation increased by USD 12,560 million in eleven months of the last year when compared to 2019.

The BIST 100 index continued its upward movement, which started after November, also in December, closing the year at 1.476.72, becoming one of the best performing stock exchanges worldwide.

MANAGEMENT AND COMMITTEES

Board Members

1 Ziya AKKURT
Chairman of the Board of Directors

2 Mehmet Oğuz ÇARMIKLI
Deputy Chairman of the Board of Directors

3 Mehmet Mete BAŞOL
Member of the Board of Directors

4 Dr. Eyüp Sabri ÇARMIKLI
Member of the Board of Directors

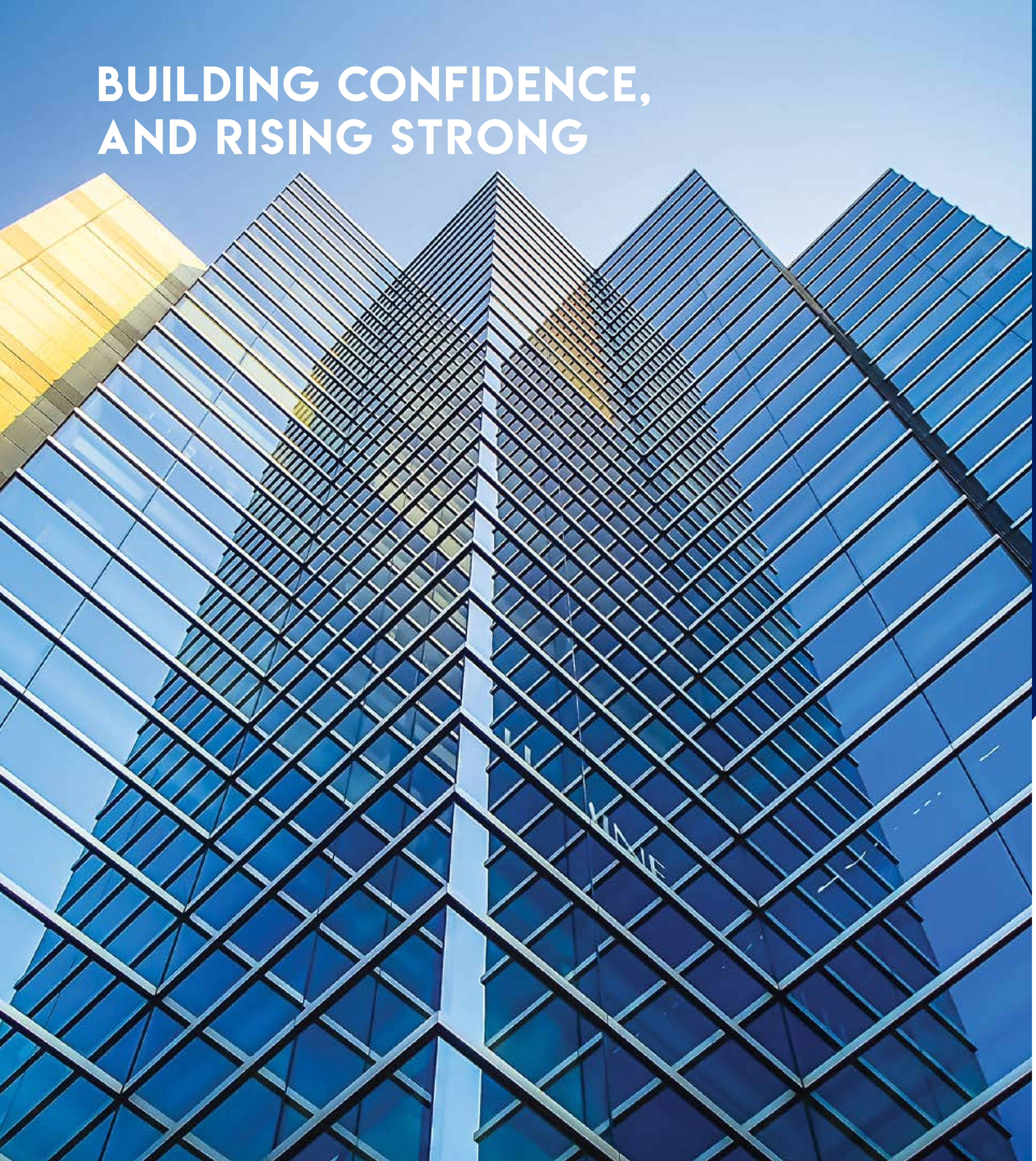
5 Gürhan ÇARMIKLI
Member of the Board of Directors

6 Ahmet Kerim KEMAHLI
Member of the Board of Directors

7 Yusuf SERBEST
Member of the Board of Directors

8 Ahmet ŞİRİN
Member of the Board of Directors

9 Özgür ALTUNTAŞ
Board Member and General Manager



MEMBERS OF THE BOARD OF DIRECTORS

Ziya AKKURT
Chairman of the Board of Directors

Ziya Akkurt, who is a graduate of Middle East Technical University, Department of Public Administration, started his career at Interbank in 1983. Chronologically, he worked at BNP-AK-Dresdner Bank Loans and Marketing Department and at Osmanlı Bankası / Banque Paribas / Paris International Banking Department. Mr. Akkurt, who started to work at Akbank Corporate Banking department in 1996, served in various departments in Akbank and worked as the CEO between 2009 and 2012. Between 1996 and 2012, he served as the Board Member responsible for loans at BNP-AK- Dresdner Bank, Akbank A.G, BNP-AK-Dresdner Leasing and Ak Yatirim A.S. Ziya Akkurt continues working at Nurol Yatırım Bankası A.Ş. as the Chairman of Board of Directors since February 2016.

Mehmet Oğuz ÇARMIKLI
Deputy Chairman of the Board of Directors

M. Oğuz Çarmıklı is a graduate of İstanbul State Engineering and Architecture Academy, Yildiz Engineering High School, Department of Civil Engineering. M. Oğuz Çarmıklı served as a senior manager in Nurol Construction Company, which turned into Nurol İnşaat ve Ticaret A.S. afterwards and which is the first company of Nurol Companies Group. He has been serving as the Deputy Chairman of the Board of Nurol Yatırım Bankası since 1999 and a member of the Bank's Remuneration Committee since 13.12.2011.

Dr. Eyüp Sabri ÇARMIKLI
Member of the Board of Directors

He graduated from the University of Essex, London, Department of Political Sciences in 1997. He continued his academic career in the University of Westminister, London in 2001 with a Master's Degree in International Relations and Political Theory. In 2002, he completed his Master's Degree in University of London, Birbeck College, in the field of Contemporary History and Politics. In 2011, he completed his Political Sciences PhD in Westminster University, London. He started his professional career as a director in Riyadh agency of Nurol İnşaat Ticaret A.Ş. between 1991-1992. He worked as the Head of Land Development Department at Nurol Insaat Ticaret A.S. between 1992 and 1993. He served as the General Manager of Nurol Pazarlama ve Dis Ticaret A.S. between 1993 and 1994. Since 1994, he is working as the Member of the Board of Directors at Directors at Nurol İnşaat A.Ş. At the same time, he was appointed as a Board Member of Nurolbank on September 2016.

BOARD MEMBERS

Ahmet Kerim KEMAHLI
Member of the Board of Directors

He graduated from Oxford, St. Edward's School. He completed the Business Organization program at Heriot-Watt University in Edinburgh. Mr. Kemahlı, who started his career in 1990 at West LB, worked at Finansbank, Abalioglu Holding and Celebi Holding, chronologically. He has been the Finance Coordinator of Nurol Holding since 2010 and the Board Member of Nurol Yatırım Bankası since 2011 and a Member of the Audit Committee since 2014.

Mehmet Mete BAŞOL
Member of the Board of Directors

He graduated from the University of Arizona, Department of Economics with a B.S degree. Mr. Basol, who started his career in 1984, served as Executive Director at the Boards of Interbank, Bankers Trust, Deutsche Bank, and Public Banks, chronologically. He still serves as a Board Member and Consultant in various companies. He has been working as the Member of the Board of Directors of Nurol Yatırım Bankası A.Ş. and Corporate Management Board since August 2014.

Gürhan ÇARMIKLI
Member of the Board of Directors

He graduated from Bilkent University Faculty of Economics and Administrative Sciences, Department of Economics, and Faculty of Business Administration, Department of Business Information Management. He has been a Board Member of Nurolbank since May 2016. He started his career in Nurol Holding Finance Department in 2003. He worked in the Accounting and Finance departments of FNSS A.Ş. between 2007 and 2008. He worked at Nurol Holding A.Ş. Finance Department between 2008 and 2011. He has been working as the member of Board of Directors at Nurol İnşaat A.Ş. since December 2001.

BOARD MEMBERS

Ahmet ŞİRİN
Member of the Board of Directors

He graduated from Ankara University, Faculty of Political Sciences. He received his Master's Degree from Leeds University. Mr. Şirin, who began his career at the Inspection Board of the Ministry of Finance in 1980, served as Head of Department in Revenue Administration, Deputy Undersecretary at the Ministry of Finance, Finance Director at the Ministry of Public Works and Settlement, Second Presidency at BRSA and Chairman Advisor at BRSA, chronologically. He has been serving as the Board Member - Chairman of Audit Committee and Chairman of Corporate Governance Committee of Nurol Yatırım Bankası Since July 2013.

Yusuf SERBEST
Member of the Board of Directors

He graduated from Istanbul University, Department of Business Administration. Mr. Serbest, who started his career in the Treasury Department of Töbank T.A.Ş. in 1989, worked in Nurol Menkul Kıymetler A.Ş., served as the Deputy Chairman of the Board of ISE and Executive Committee Member of Aydın Örme San. ve Tic.A.Ş. He has been a member of the Board of Nurol Yatırım Bankası since 2001.

Özgür ALTUNTAŞ
Board Member and General Manager

He graduated from Istanbul Technical University, Department of Management Engineering. Mr. Altuntaş, who started his career in Istanbul Bankers Trust in 1993, worked as the Director of Developing Markets and Head of Turkey Region in Amsterdam, Bucharest and London, Garanti Bankası, AMEX Bank, Credit Suisse and Morgan Stanley, respectively. Mr. Altuntaş, who returned to İstanbul in August 2011, served as Chief Deputy General Manager in Royal Bank of Scotland for two years until June 2013. He has been serving as the Board Member - General Manager of Nurol Yatırım Bankası A.Ş. since 16 September 2013.

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Senior Management

1 Özgür ALTUNTAŞ
Board Member and General Manager

2 Zafer Babür HAKARAR
Head Assistant of the General Manager of Treasury and Financial Institutions Department

3 Dr. Murat ÇİMEN
Chief Deputy General Manager of Loans Department

4 Ahmet Murat KAVURGA
Deputy Manager of Operations and Information Management

5 Yeliz BİLGİN
Deputy General Manager of Investor Affairs Department

6 Semih Subutay NEZİR
Deputy General Manager of Audit and Compliance Management Department

7 Cenk ATMACA
Deputy General Manager of Financial Institutions Department

SENIOR MANAGEMENT

Özgür ALTUNTAŞ
Board Member and General Manager

He graduated from Istanbul Technical University, Department of Management Engineering. Mr. Altuntaş, who started his career in Istanbul Bankers Trust in 1993, worked as the Director of Developing Markets and Head of Turkey Region in Amsterdam, Bucharest and London, Garanti Bankasi, AMEX Bank, Credit Suisse and Morgan Stanley, respectively. Mr. Altuntaş, who returned to Istanbul in August 2011, served as Chief Deputy General Manager in Royal Bank of Scotland for two years until June 2013. He has been serving as the Board Member - General Manager of Nurol Yatırım Bankası A.Ş. since 16 September 2013.

Zafer Babür HAKARAR
Chief Deputy of the General Manager of Treasury and Financial Institutions Department

He graduated from Boğaziçi University, Department of Mechanical Engineering. Mr. Hakarar, who started his career as a specialist at Finansbank in 1995, worked as the Finance and Business Development Director at Credit Europe and Tosyalı Holding in Amsterdam respectively. Z. Babür Hakarar has been serving as the Chief Deputy General Manager responsible for Treasury in Nurol Yatırım Bankası since September 2013.

Dr. Murat ÇİMEN
Chief Deputy General Manager of Loans Department

He graduated from ITU, Department of Civil Engineering. He received his master's and doctorate degrees from Bogazici University. Mr. Çimen, who started his career at Interbank in 1996, served as the Senior Specialist, Investment Banking Department Head, and Deputy General Manager responsible for Investment Banking at Nurol Yatırım Bankası, Project Finance and Financial Leasing Department in 1999. He has been serving as the Chief Deputy General Manager responsible for Loans since 2017.

SENIOR MANAGEMENT

Ahmet Murat KAVURGA
Deputy Manager of Operations and Information Management

He graduated from Marmara University, Department of Foreign Languages. Mr. Kavurga, who started his career as a Senior Officer in Adabank in 1986, worked at Chase Manhattan Bank Turkey, Garanti Bankası Romania and Credit Europe Bank Moscow, respectively. He has been serving as the Deputy General Manager responsible for Operations and Information Management since February 2014.

Semih Subutay NEZİR
Deputy General Manager of Audit and Compliance Management Department

He is a graduate of METU, Faculty of Economics and Administrative Sciences, Department of Economics. Mr. Nezir, who started his career at Interbank in 1986, worked as the Section Head of Credit Tracking and Monitoring at General Directorate of Esbank. Semih Subutay Nezir has been working at Nurol Yatırım Bankası since 2001 and serving as the Deputy General Manager responsible for Audit and Compliance Management since March 2014.

SENIOR MANAGEMENT

Yeliz BİLGİN
Deputy General Manager of Investor Affairs Department

She graduated from Marmara University, Department of Business Administration. Ms. Bilgin, who started her career in the Treasury Department of Finansbank in 1998, began to work in the Department of Treasury and Financial Institutions at Nurol Yatırım Bankası in 2007 and she has been serving as the Deputy General Manager of Investor Affairs Department since April 2015.

Cenk ATMACA
Deputy General Manager of Financial Institutions Department

He is a graduate of Ankara University, Faculty of Political Sciences, Department of Public Finance. Mr. Atmaca, who started his career in the Foreign Affairs Department of Finansbank in 1992, worked in Fiba Bank between 1998 and 2000. He worked as the Deputy General Manager in Foreign Affairs Department at Credit Europe Amsterdam between 2000 and 2008. He worked as Dubai General Manager at Credit Europe Bank between 2008 and 2016. He has been working as the Deputy General Manager of Nurolbank Financial Institutions Department since 2018.

KNOWING HOW TO CONSIDER ALL ANGLES

CORPORATE GOVERNANCE COMMITTEE

Corporate Governance Committee

The Committee was established to monitor and guide the Bank's corporate governance practices pursuant to Article 22 of the Banking Law No. 5411. It operates in accordance with the provisions of the "Regulation on the Principles of Corporate Governance of Banks", which came into force after being published in 01.11.2006 dated Official Gazette no. 26333. The Committee reports to the Board of Directors. It convened 2 times in 2020 to monitor the Bank's compliance with corporate governance principles, to carry out improvement activities and to make suggestions to the Board of Directors.

Position	Name and Surname	Primary Position
Chairman	Ahmet ŞİRİN	Member of Board of Directors
Member	Mehmet Mete BAŞOL	Member of Board of Directors

Remuneration Committee

The Committee reports to the Board of Directors. It was established with 13.12.2011 dated Board Decision No. 449 pursuant to the provision of "A Remuneration Committee consisting of at least two members shall be established in order to monitor and audit the remuneration practices on behalf of the Board of Directors" in the "Regulation on the Principles of Corporate Governance of Banks" published by the BRSA in 01.11.2006 dated Official Gazette no. 26333. The Remuneration Committee convened once in 2020 to make remuneration suggestions to the Board of Directors.

Position	Name and Surname	Primary Position
Chairman	Mehmet Oğuz ÇARMIKLI	Deputy Chairman of the Board Member
Member	Ahmet Kerim KEMAHLI	Member of Board of Directors

Audit Committee

Audit Committee The Committee was established to supervise the internal control procedures in the Regulation on Internal Systems of Banks published in 11.07.2014 dated Official Gazette no. 29057 and to observe whether the Bank's internal policy and practice procedures approved by the Board of Directors have been complied with and to fulfill the audit and supervision activities of the Board of Directors of the Bank. The Audit Committee convened 17 times in 2020 to make suggestions to the Board of Directors.

Position	Name and Surname	Primary Position
Chairman	Ahmet ŞİRİN	Member of Board of Directors
Member	Ahmet Kerim KEMAHLI	Member of Board of Directors

Disciplinary and Personnel Committee

Reserving the mandatory provisions of the Labor Law No. 4857 and the relevant legislation, it was established with the suggestion of the Human Resources Department and the approval of the General Manager to monitor and guide the provisions of the regulation on the responsibilities, terms of service, personal rights and disciplinary procedures of the Bank staff.

The Committee reports to the General Manager in order to determine the degree of defects and possible damages of the transactions and acts required by the disciplinary action of the legislation and disciplinary regulations of the Bank and other legal regulations related to Labor Law. The Committee convenes when necessary under the chairmanship of the General Manager with the participation of the relevant managers and settles the agenda items.

Position	Name and Surname	Primary Position
Chairman	Özgür ALTUNTAŞ	Member of Board of Directors - General Manager Chief
Member	Dr. Murat ÇİMEN	Deputy General Manager of Loans Department
Member	Ahmet Murat KAVURGA	Deputy Manager of Operations and Information Management

Information Systems Strategy Committee

The Committee reports to the Board of Directors. It operates under the "Communiqué on Principles to be Considered in the Management of Information Systems in Banks" published in 14.09.2007 dated Official Gazette no. 26643. It informs the Board of Directors on strategic compliance in order to take decisions for the management and administration of the legislation/provisions related to Information Systems, identification of the strategic direction and fulfillment of the Information Systems governance purposes, and it was established with 17/06/2008 dated Board decision no. 336 in order to address it at the Board of Directors level as a part of the corporate governance. The Committee convened 2 times in 2020.

Position	Name and Surname	Primary Position
Chairman	Özgür ALTUNTAŞ	Member of Board of Directors - General Manager
Member	Zafer Babür HAKARAR	Treasury and Financial Institutions Chief Deputy of the General
Member	Ahmet Murat KAVURGA	Manager Operations and Information Management Deputy General
Member	Recep GÜL	Manager Financial Control Group Manager

CORPORATE GOVERNANCE COMMITTEE

Active Passive Committee

The Asset and Liability Committee convenes every week under the chairmanship of the General Manager with the participation of Deputy General Managers and the Unit Managers who are involved in activities that may affect the balance sheet. The agenda of the meeting consists of assessing the Bank's balance sheet, fields of operations, activities, general economic data and current political and economic developments, and determining the weekly strategy. It convened 52 times in 2020.

Position	Name and Surname	Primary Position
Chairman	Özgür ALTUNTAŞ	Member of Board of Directors - General Manager
Member	Zafer Babür HAKARAR	Treasury and Financial Institutions Chief Deputy of the General
Member	Recep GÜL	Financial Control Group Manager
Member	Melike BAYRAKTAR	Financial Control Manager

Credit Committee

The Committee reports to the Board of Directors. It was established in accordance with the "Regulation on the Credit Transactions of Banks" published by the BRSA and its working principles were identified within the scope of this regulation. In our Bank, the Credit Committee convenes every week as a general practice, except for exceptional cases.

The Credit Committee presents its opinions to the Board of Directors about the results of the activities carried out by the responsible units and the applications that need to be performed and other issues it deemed necessary for the Bank to maintain its activities in a safe manner. It conveyed 33 times in 2020.

Position	Name and Surname	Primary Position
Chairman	Ziya AKKURT	Chairman of Board of Directors
Member	Mehmet Mete BAŞOL	Member of Board of Directors
Member	Özgür ALTUNTAŞ	Member of Board of Directors - General Manager

OUR CODES OF CONDUCT

HUMAN RESOURCES PRACTICES

Our Employees Are Cornerstones of Our Achievements

Our hard work, honesty, commitment to our ethical values, and our human resources management approach aiming at continuous improvement in our professional expertise, competence and skills in order to add more value to our customers are the cornerstones of our success.

Performance Management

On the other hand, our performance management system has been developed in order to identify the periodical success standards of our Bank and our employees, to focus on the development of our employees and to reward their successes within the previous operating cycle.

Our performance plans have been rearranged and implemented so as to include concrete, measurable, timedependent targets, as well as competence and development planning.

Development of Our Employees

Our human resources policy is to ensure that all of our employees will be able to adapt to the development of our Bank, to have a broad vision of investment banking, oriented to provide solutions to the needs of our customers, to ensure the continuity of our quality service understanding and to be open to innovation.

Within this context, we take care to ensure that basic competence and knowledge levels of our employees are maintained at high level, to provide them with training for multiple skills, so that they back up and support each other in critical work flows.

Within the framework of our continuous development approach, our employees were ensured to participate in the necessary trainings and seminars in the required fields in 2020. During the operating period, our employees were ensured to participate in professional training and certification programs organized by the Banks Association of Turkey, Capital Markets Board and Borsa Istanbul A.S. As of the end of 2020, our number of employees is 66 and 95% of them are university graduates. Average age of our employees is 38 and the average year of seniority at our bank is 5.92 years. The average sectoral experience of our employees is 12.39 years. 43.18% of our employees are women.

APPLYING ESSENTIAL PRINCIPLES CORRECTLY

CORPORATE MANAGEMENT CODE OF CONDUCT PRACTICES

Corporate Governance Ethical Rules Compliance Statement, transparency and commitment to the ethical values have always been a priority for our Bank.

Social Responsibility

Our Regulation on Corporate Governance Codes of Conduct prepared by taking into account the principles of Social Responsibility guides us in conducting all our banking operations.

In all our activities, we act by taking into consideration the benefits of society.

Within the framework of these rules, we are trying to fulfill our social responsibilities in harmony with our employees and all our stakeholders, and we support our employees to be volunteers in their internal and external social responsibility activities.

As we included in our directive on Compliance Policy and Compliance Risks of our Bank, the services offered by our Bank are not qualified to be harmful to public health, public security or environment, and in addition our bank has adopted the same principles when selecting the projects it will finance, and we take care to carry out our activities under light of this principle.

CORPORATE MANAGEMENT CODE OF CONDUCT PRACTICES

Stakeholders

Our Corporate Governance Committee coordinates the processes of contact with shareholders as determined in our Corporate Governance Codes of Conduct, which was prepared in accordance with the provisions of the Regulation on Banks' Corporate Governance Codes of Conduct published by the BRSA and approved by the Bank's Board of Directors.

In terms of our Shareholders

- We inform our shareholders in accordance with the principles of public disclosure.
- We enable our Bank to assess the effectiveness of senior management in bank management by ensuring that shareholders, depositors, market participants and the public have a sufficient level of knowledge about the structure and objectives of the bank.
- We provide information about our Bank in a timely, accurate, complete, comprehensible, impartial, easily accessible and equal manner to the public in order to help people and institutions make decisions.
- By the year-ends and in March, June and September, we carry out applications for informing the public by consolidating the financial statements of subsidiaries, jointly controlled partnerships and affiliates with or without credit institution or financial institution nature basing on the Accounting Standards of Turkey.

In terms of our customers:

- We have developed systems and processes open to our customers' wishes, suggestions or complaints to improve our organization and services.
- For these suggestions and complaints, we use our website and private telephone line. We commission and charge the Customer Complaint Line and the

In terms of our employees:

- We give importance to the development, informing, and participation of our employees in management and we improve our processes in this direction.
- Our in-house information is coordinated and conducted through our inhouse information portal, employee meetings, employee satisfaction and opinions survey, performance planning and evaluation processes organized by our Human Resources Department.

CORPORATE MANAGEMENT CODE OF CONDUCT PRACTICES

Public Disclosure and Transparency

As determined in our Corporate Governance Codes of Conduct, which was prepared in accordance with the provisions of the Regulation on Banks' Corporate Governance Codes of Conduct published by the BRSA and approved by the Bank's Board of Directors, in terms of Bank Management Application Procedures and Principles on public disclosure and transparency issues;

Equality;
It aims at equal treatment to shareholders and stakeholders in all activities of the Bank's Management and to prevent potential conflicts of interest.

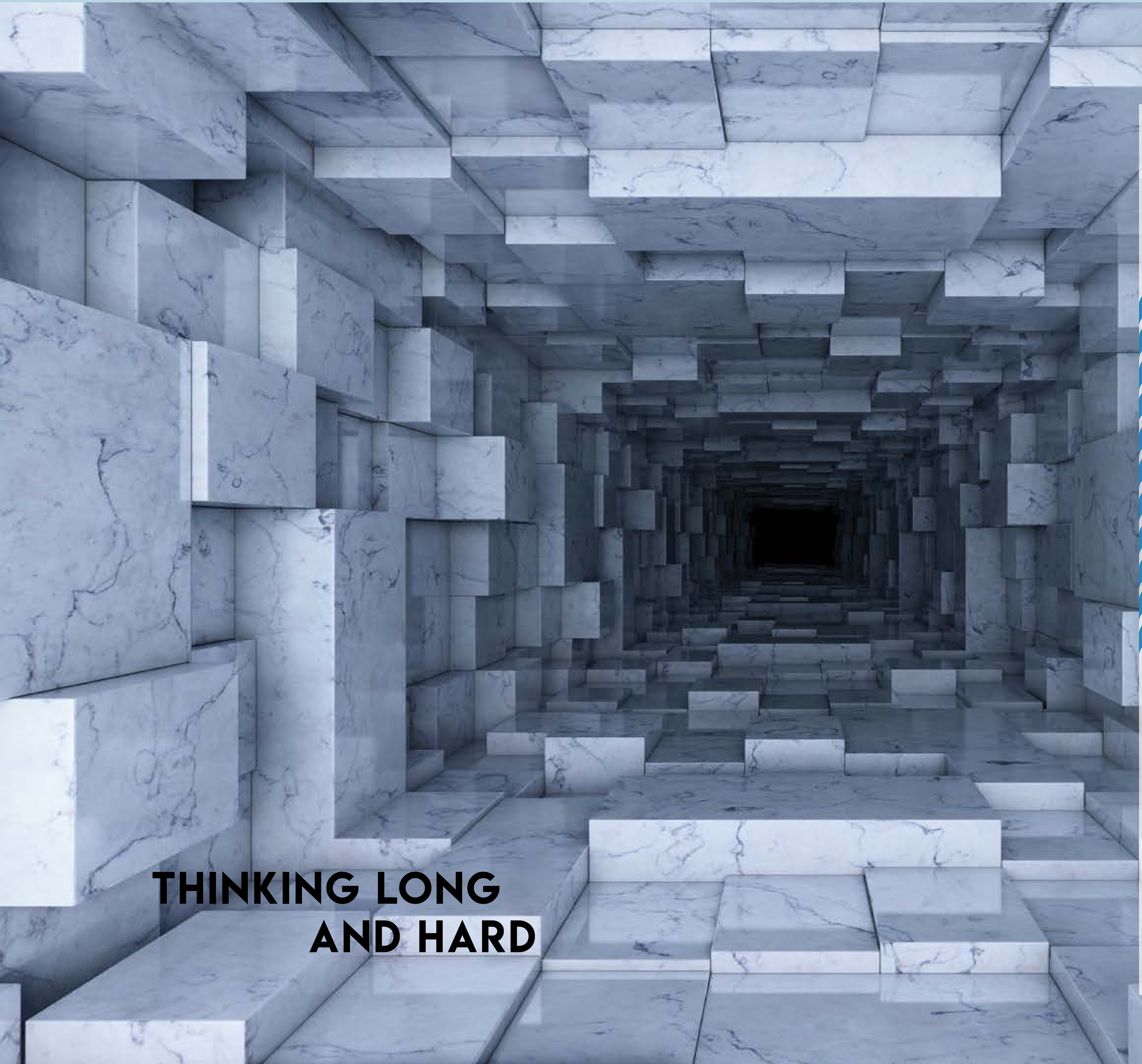
Transparency;
Except for trade secrets and information not yet disclosed to the public, it adopts the approach of publicly disclosing financial and non-financial information related to the Bank in a timely, accurate, complete, comprehensible, interpretable, and easily accessible manner at low cost.

Responsibility;
It ensures that all the activities of the Bank's management on behalf of the Bank are in compliance with the legislation, the articles of association and internal regulations.

Accountability;
It works by taking into consideration the accountability of the members of the Board of Directors mainly against the Bank's legal entity and therefore to the shareholders, thus providing transparency in corporate governance.

We actively use our bank's website in public disclosure. Our website includes the following headings and contents:

- Corporate (About Us, Our Vision and Mission, Our Strategy, Message from the Chairman of the Board, Message from the General Manager, CorporateGovernance)
- Banking Services (Investment Banking, Corporate Banking)
- Investor Affairs (Activity Reports, Audit Reports, General Assembly Minutes, Our Management Policies and Announcements (AML Policies, US Patriot Act, Public Disclosure Form, Investor Rights, TBB Arbitration Board, BRSA Announcements, CMB Announcements, Product and Service Fees)
- Communication (Our Human Resources Policy, Career, Our Announcements, Job Application Form)
- Contact Us (Customer Complaint Line, Our Addresses)



INFORMATION ON TRANSACTIONS OF THE BANK WITH THE RISK GROUP IT IS INVOLVED

Through its branches and head office departments, our Bank provides commercial banking and investment banking services to Nurol Group companies.

The scope of our Bank's Activities;

- All kinds of cash and non-cash credit transactions,
- Cash and fiduciary payment and fund transfer transactions, use of correspondent banking accounts,
- Trading of money market instruments,
- Exchange transactions, including effective
- Purchase and sale of capital markets instruments,
- Capital market repurchase and resale commitment transactions,
- Financial leasing transactions,
- By-product transactions,
- Intermediary for foreign currency futures contracts,
- Forward exchange transactions between banks,
- Warranty transactions.

Feasibility studies of the works for which a bid will be proposed, project financing, issuance of long-term investment loans or issuance of syndicated loans, issuance of high amount non-cash loans or issuance of syndicated loans in the same way, hedging/by-products developed for protection against interest and currency risks, intermediation, leasing and factoring transactions for the non-standard risks of local and international projects (country risk, political risk, profit loss risk, contract risks etc.) developed by Nurol Group companies or public or other private institutions within the scope of investment banking services.

ACTIVITIES FOR WHICH SUPPORT SERVICES ARE RECEIVED PURSUANT TO THE REGULATION ON RECEIVING OF SUPPORT SERVICES BY THE BANKS

Within the scope of the Regulation on Receiving of Support Services by the Banks published by BRSA on 5.11.2011, we work with;

- Intertech Bilgi Islem ve Pazarlama Ticaret A.S. within the scope of the main banking system service,
- Platin Serbest Muhasebeci Mali Musavirlik Limited Sirketi for the payroll operations and reporting, preparation of legal declarations and forms and tax declarations,
- Credence Risk Yonetimi ve Danismanlik A.S. within the scope of call center and archiving services.

Report of the Audit Committee

Dear Shareholders,

The activities carried out by the internal systems (Internal Audit and Risk Management) within the scope of the relevant legislation are evaluated by the Audit Committee at the periodical meetings, and the decisions about the measures, practices and other important issues at our Bank are taken and the opinions are submitted to the Board of Directors.

The Audit Committee convened 10 times in 2020 to make suggestions to the Board of Directors. The first six month Audit Committee Activity Report of 2020 was prepared, examined by the Audit Committee and submitted to the Board of Directors. In addition, the evaluation letters on the reports of the audited activities were prepared and put into process.

Emergency exercises are conducted every year at our Bank regularly. Prior to performing emergency exercises, a scenario of the exercise is prepared by the emergency working group and this scenario is reviewed and approved for implementation by the Executive Committee. Adhering to the exercise scenario, emergency exercises are carried out with the overall participation of all units of the Bank.

Internal Control Department

The Internal Control Department, operating under the Board of Directors, is structured in such a way to ensure that all financial and operational risks identified related to the operations are continuously maintained at reasonable level and controlled for the protection of the Bank's assets, the execution of its activities in accordance with the legislation, internal legislation, regulations, internal policies, strategies and targets, and safe establishment of calculation and recording order and financial reporting system.

The Internal Control Department carries out risk and process-oriented reviews and controls within the scope of the Bank's activities and is responsible for reviewing, monitoring and evaluating the suitability, adequacy and effectiveness of the controls and reporting the results to the relevant persons.

The Internal Control Department, operating under the Board of Directors, is structured in such a way to ensure that all financial and operational risks identified related to the operations are continuously maintained at reasonable level and controlled for the protection of the Bank's assets, the execution of its activities in accordance with the legislation, internal legislation, regulations, internal policies, strategies and targets, and safe establishment of calculation and recording order and financial reporting system.

The Internal Control Department carries out risk and process-oriented reviews and controls within the scope of the Bank's activities and is responsible for reviewing, monitoring and evaluating the suitability, adequacy and effectiveness of the controls and reporting the results to the relevant persons.

Continuous effective, accurate, orderly and safe conduct of operations and transactions are ensured through functional task allocations, transaction-approval authorities and limits, system controls, post-processing controls and other process-specific controls. In addition, IT controls are carried out as the continuation and part of the process implementation controls.

Operational errors and deficiencies identified within the scope of internal control activities are firstly shared with the staff carrying out the activities, and necessary complementary and preventive measures are taken quickly. Operational errors and deficiencies that have not been resolved are subjected to reports, and are also recorded in the database with defined operational risk matrix codes.

Internal Control Department

Within the scope of 2020 internal control business plan, 3 Banking Process and 2 Support Service and Information Systems (COBIT) companies were subjected to on-site inspection. In addition to monitoring the appropriateness of the bank's records within the scope of remote control, bank procedures and their compliance with the legislation and other procedures are examined by sampling method, while in the scope of On-Site Inspection; the compliance of the transactions with the internal and legal regulations was checked, and the findings, opinions and suggestions were primarily shared with the business owners responsible for carrying out the activities depending on their risk, importance level, and whether the corrective/preventive actions are taken regarding the determination, and after the necessary joint assessment, reports were prepared to inform the management levels and the Audit Committee.

The Internal Control Department Manager also serves as the MASAK Compliance Officer in order to ensure compliance with the regulations introduced by MASAK and to carry out the necessary works.

Our Bank has established a bank policy and acceptance processes within the frame of international best practices and MASAK regulations. These policies and processes are reviewed on a regular basis every year and updated as necessary. A special software is used to identify suspicious transactions and to control customer identifications and money transfers from negative lists. Our Bank provides its employees with regular training on this issue with the awareness of the importance of training in the prevention of money laundering and terrorist financing. Trainings can be given in two ways: in the classroom or via distance education.

Internal Audit Department

The Internal Audit Department executes the internal audit function covering all activities of the Bank by reporting to the Board of Directors. For this purpose, the Internal Audit Department carries out inspection works that supervise whether the performance of the activities are carried out in accordance with the legislation and internal strategies, policies, principles and objectives of the Bank. All activities of the Bank are audited periodically without any restriction in order to achieve the expected objective and benefit from the internal audit system.

It is based on risk-oriented approach in determining the activities to be audited in addition to the requirements of legal regulations. The Internal Audit Department evaluates the effectiveness and adequacy of the internal control and risk management systems by auditing the activities of the Bank in line with the laws and other legislation and internal strategies and objectives. The compliance of the activities with the legislation, the adequacy of the internal legislation, the adequacy, accuracy and effectiveness of the Bank's activities, the accuracy and reliability of the reports, accounting records and financial reports submitted to the BRSA and Senior Management and their compliance with time restrictions, and the structure of the internal processes are evaluated in the periodical and risk-based audits.

As a result of the audit activities, it is aimed to reveal the shortcomings, errors and abuses in the operations of the Bank. An approach that presents opinions and suggestions for the prevention of the recurrence of identified situations and for the effective and efficient use of the Bank's resources is adopted.

The Internal Audit Department shall review the information systems within the frame of the procedures and principles identified in the 5th section of the "Regulation on the Audit of the Bank's Information Systems and Banking Processes to be Carried Out by the Independent Audit Organizations" with "Procedures for the Audit of Information Systems and Banking Processes" heading.

FINANCIAL INFORMATION and EVALUATIONS REGARDING RISK MANAGEMENT

Internal Audit Department

Whether the results obtained through the risk measurement models and methods used in the Bank are included in the daily risk management, the pricing models and assessment systems used by the Bank, the risks covered by the risk measurement models used by the Bank, the accuracy and adequacy of the data and assumptions used in the models, the reliability, integrity and timely provision of the source of data, and the accuracy of the retrospective tests are evaluated in the internal audit activities for risk management. The internal evaluation process of the Bank's capital requirement is audited under the internal audit system within the frame of the legislation and internal regulations of the Bank in relation to this process.

The inspection reports that are issued as a result of the activities are communicated to the Audit Committee, senior management and relevant departments. The activities to eliminate the identified findings are followed by the Internal Audit Department. The Board of Directors closely follows the activities of the Internal Audit Department through the activity reports for the quarterly periods submitted by the Audit Committee.

Risk Management Department

Risk Management Department carries out activities related to measuring, monitoring, controlling and reporting of identified risks within the frame of the application procedures determined by risk management policies and procedures, which have an organizational structure directly affiliated to the Board of Directors, and which are independent of executive functions, approved by the Board of Directors and reviewed regularly.

The purpose of the risk management system is to identify, measure, report, monitor and control the risks incurred through policies, procedures and limits identified to monitor, control and, when necessary, change the nature and level of activities, and to determine the internal capital requirement in line with the risk profiles. Bank of the Bank determines the level of risk appetite it wishes to bear in order to achieve its objectives by considering the risk capacity of the Bank and regularly reviews it.

The analyzes, simulations, scenarios, stress tests and Internal Capital Adequacy Assessment Process (ISEDES) report carried out within the scope of risk management play a role in the strategic decisions taken by the senior management of our Bank and support the decision-making mechanism.

Within the framework of the Risk Management Program, an annual evaluation is made for the organizations that receive support services by the Risk Management Department.

The analyzes, simulations, scenarios, stress tests and Internal Capital Adequacy Assessment Process (ISEDES) report carried out within the scope of risk management play a role in the strategic decisions taken by the senior management of our Bank and support the decision-making mechanism.

Within the framework of the Risk Management Program, an annual evaluation is made for the organizations that receive support services by the Risk Management Department.

INTERNAL AUDIT MANAGEMENT DEPARTMENT

Baki ARSLAN
Manager of the Internal Control Department

He is graduated from Anatolian University, Faculty of Economics and Administrative Sciences, Department of Economics. Having started his career at Turkishbank Financial and Administrative Affairs Department in 1995, Arslan worked at EGS Bank and Bayındırbank respectively. Mr. Arslan started to work at Nurol Yatırım Bankası since April 2002, then he has been working as the Manager of the Internal Control Department as of August 2009.

Yusuf Abdullah KARADAĞ
Manager of Audit and Compliance Group

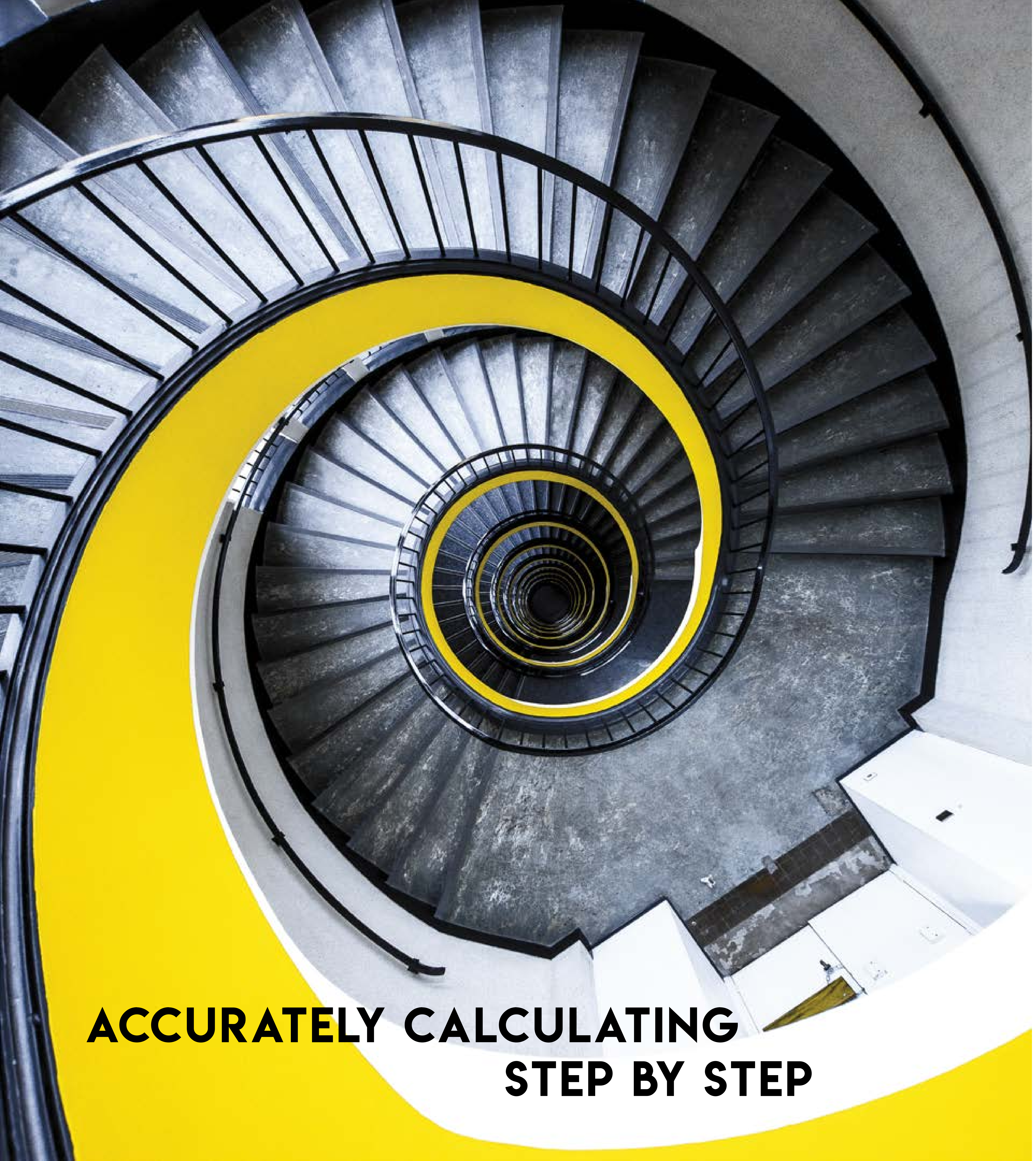
Karadağ, who is a graduate of Boğaziçi University, Department of Political Science and International Relations, worked as the Head of the Board of Inspection of Demirbank T.A.Ş. in 1997 and as the Manager of the Fraud Prevention Unit in the Bank at HSBC Bank A.Ş. in 2005, as Senior President in the Internal Systems Group and Legislation Development Department at Aktif Yatırım Bankası A.Ş., as Senior Manager in HSBC Bank A.Ş. Regulations and Legislation Compliance Department in 2016, worked at Türkiye Emlak Katılım Bankası A.Ş. as Chairman of the Group Internal Control Systems in 2018, and he has been working as the Manager of the Audit and Compliance Group at our Bank since 2020.

Tuğba USKUAY
Manager of Risk Management Department

He graduated from Uludağ University, Department of Econometry. Starting his career in 2007 as an Assistant Specialist at Turkishbank, Uskuay has been working at Nurol Yatırım Bankası since 2008. Uskuay, who was appointed as the Director of the Risk Management Department in May 2014, has been serving as the Risk Management Manager since January 2016.

Mustafa ERTURAN
Manager of the Internal Audit Department

He is graduated from Galatasaray University, Faculty of Economics and Administrative Sciences, Department of Economics. He started his career as an Assistant Inspector at Denizbank A.Ş. and assigned in the Inspection Board of Aktif Yatırım Bankası A.Ş. and ICBC Turkey Bank A.Ş., respectively. He has been serving as the Internal Audit Manager at Nurol Yatırım Bankası A.Ş. since September 2020.



INFORMATION ON RISK MANAGEMENT POLICIES BY RISK TYPES

Credit Risk

With regard to the credit risk, activities are carried out to measure, analyze, report and monitor credit risk. Credit risk is the risk exposed in case the counter party fails to meet its obligations determined through agreement. The credit risk is managed through the credit policies and procedures in the Bank. Within this framework, credit risk is managed on the basis of criteria such as the structure and characteristics of the credit, the provisions of the credit agreement and the financial conditions, the structure of the risk profile until the deadline in line with the possible market trends, the guarantees and collaterals, concentrations and compliance with the limits determined by the Board of Directors.

The credit allocation is carried out within the limits determined on the basis of each debtor. It is obligatory for each customer who has a credit transaction to have a credit limit allocated by the Board of Directors. In addition, the customer is not allowed systematically to excess the limit of his/her credit risk.

Our credit portfolio is analyzed depending on the credit type, currency, sector, credit debtor, group-based distribution and concentration, average maturity, and interest sensitivity, and submitted to the Senior Management and Audit Committee together with monthly reports. The amounts subject to credit risk are calculated using the standard approach method.

The management of counter-party credit risk is performed through the allocation of credit limit. While calculating the counter-party credit risk, fair value method is used. Country risk policy is taken into account during the allocation of counter-party credit limits.

Determination of the collaterals to be accepted for the allocation of counter-party limit is under the authority of the Board of Directors with the approval of the Credit Committee. Senior management evaluates the counter-party, country and sector risks and take action decision when necessary.

Market Risk

In addition to the legal limits, internal limits have been established in order to manage and limit the market risk. Market risk limits and functioning of the process, and control and early warning limits in the risk appetite document are identified with the approval of the Board of Directors and announced within the Bank. The risk limits are regularly monitored and reported by the Risk Management Department.

Within the scope of market risk, RMD measurements calculated using the internal method and the currency risk and general market risk calculated through standard method, stress tests and scenario analyzes are performed and their results are shared with the Senior Management and Audit Committee regularly by the Risk Management Department.

INFORMATION ON RISK MANAGEMENT POLICIES BY RISK TYPES

Operational Risk

With regard to the operational risk, risk identification, classification and analysis are carried out. The amounts subject to operational risk are calculated through the basic indicator approach. While measuring the operational risk, operational risk loss data for Basel II compliance is systematically collected and evaluated in the operational risk database. With the limit of the operational risk amount determined by the basic indicator, the records taken from the database, loss and near-loss amounts are evaluated and reported to the Senior Management and the Audit Committee regularly.

Interest Rate Risk Caused by Banking Accounts

With regard to the interest rate risk caused by banking accounts, in order to determine the interest rate risk exposed by the Bank due to maturity noncompliance in the on-balance sheet and off-balance sheet positions, liquidity gap and interest rate sensitivity analyzes are carried out, and all the analyses and the ratios calculated by standard shock method are reported to the Senior Management and the Audit Committee together with the monthly reports.

The interest rate risk prepared by the Risk Management Department is measured by the standard shock method and reported to the Banking Regulation and Supervision Agency. Risk appetite and early warning limits were identified for monitoring the interest rate risk.

Liquidity Risk

The liquidity management is carried out by the Treasury and Financial Institutions Department to ensure that the necessary precautions are taken in a timely and accurate manner against the market conditions and possible liquidity squeeze that may arise from the balance sheet structure of our Bank within the frame of the risk management policies approved by the Board of Directors.

In order to manage the liquidity risk effectively, the Bank and the market data are regularly monitored, and balance sheet assets and liabilities maturity structure and market borrowing volume analyses are carried out. The liquidity risk is managed by taking into account the early warning limits besides the compliance with the legal liquidity ratio as the risk appetite.

Cash flow, gap analyses, stress tests and scenario analyses are periodically reported by the Risk Management Department to the Senior Management and the Audit Committee when calculating and monitoring the liquidity risk of the Bank.

Other Risks

In our Bank, the risks evaluated within the scope of the second structural block such as country and transfer risk, strategic risk, reputation risk, legal risk, concentration and residual risk are managed in accordance with the policies approved by the Board of Directors, taking into account their importance levels.

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INDEPENDENT AUDITOR'S REPORT ON THE ANNUAL REPORT OF THE BOARD OF DIRECTORS

To the General Assembly of Nurol Yatırım Bankası A.Ş.

Opinion

We have audited the annual report of Nurol Yatırım Bankası A.Ş. (the ''Bank'') and its subsidiaries (collectively referred as the "Group'') for the period of 1/1/2020-31/12/2020.

In our opinion, the consolidated financial information provided in the annual report of the Board of Directors and the discussions made by the Board of Directors on the situation of the Group are presented fairly and consistent, in all material respects, with the audited full set consolidated financial statements and the information we obtained during the audit.

Basis for Opinion

We conducted our audit in accordance with ''Regulation on independent audit of the Banks'' published in the Official Gazette no.29314 dated 2 April 2015 published by BRSA (BRSA Independent Audit Regulation) and Independent Auditing Standards (InAS) which are part of the Turkish Auditing Standards as issued by the Public Oversight Accounting and Auditing Standards Authority of Turkey (POA). Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Annual Report section of our report. We are independent of the Group in accordance with the Code of Ethics for Independent Auditors (Code of Ethics) as issued by the POA, and we have fulfilled our other ethical responsibilities in accordance with the Code of Ethics. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Our Auditor's Opinion on the Full Set Consolidated Financial Statements

We have expressed an unqualified opinion in our auditor's reports dated 3 February 2021 on the full set consolidated financial statements of the Group and the Bank, respectively, for the period of 1/1/2020-31/12/2020.

The Responsibility of the Board of Directors on the Annual Report

In accordance with Articles 514 and 516 of the Turkish Commercial Code 6102 (''TCC'') and communique on 'Principles and procedures set out by the regulations on preparation and issuance of annual reports of Banks', the management of the Group is responsible for the following items:

a) Preparation of the annual report within the first three months following the balance sheet date and submission of the annual report to the general assembly.

b) Preparation and fair presentation of the annual report; reflecting the operations of the Group for the year, along with is financial position in a correct, complete, straightforward, true and honest manner. In this report, the financial position is assessed according to the consolidated financial statements. The development of the Group and the potential risks to be encountered are also noted in the report. The evaluation of the board of directors is also included in this report.

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c) The annual report also includes the matters below:
- Subsequent events occurred after the end of the fiscal year which have significance,
- The research and development activities of the Group,
- Financial benefits such as salaries and bonuses paid to the board members and to those charged governance, allowances, travel, accommodation, and representation expenses, financial aids and aids in kind, insurances and similar deposits.
- Other matters prescribed in the communique on 'Principles and procedures set out by the regulations on preparation and issuance of annual reports of Banks' published in official gazette no.26333 dated November 1,2006.

When preparing the annual report, the board of directors takes into account the secondary legislative arrangements published by the Ministry of Customs and Trade and related institutions.

Auditor's Responsibilities for the Audit of the Annual Report

Our aim is to express an opinion, based on the independent audit we have performed on the annual report in accordance with provisions of the Turkish Commercial Code and the Communique on 'Principles and procedures set out by the regulations on preparation and issuance of the annual reports of Banks' published in official gazette no.26333 dated November 1, 2006, ''Regulation on Accounting Applications for Banks Safeguarding of Documents'' published in the Official Gazette no.26333 dated 1 November 2006 and other regulations on accounting records of Banks published by Banking Regulation and Supervision Agency ("BRSA"), circulars, interpretations published by BRSA and ''BRSA Accounting and Financial Reporting Legislation'' which includes the provisions of Turkish Financial Reporting Standards ("TFRS") for the matters which are not regulated by these regulations, on whether the consolidated financial information provided in this annual report and the discussions of the Board of Directors are presented fairly and consistent with the Group's audited consolidated financial statements and to prepare a report including our opinion.

The independent audit we have performed is conducted in accordance with InAS and BRSA Independent Audit Regulation. These standards require compliance with ethical provisions and the independent audit to be planned and performed to obtain reasonable assurance on whether the consolidated financial information provided in the annual report and the discussions of the Board of Directors are free from material misstatement and consistent with the consolidated financial statements.

The name of the engagement partner who supervised and concluded this audit is Yaşar Bivas.

Güney Bağımsız Denetim ve Serbest Muhasebeci Mali Müşavirlik Anonim Şirketi
A member firm of Ernst & Young Global Limited

Yaşar Bivas, SMMM
Sorumlu Denetçi

11 March 2021
Istanbul, Türkiye

ORDINARY GENERAL ASSEMBLY AGENDA

2020 Ordinary General Assembly Meeting Agenda

1- Opening and developing the meeting chairmanship,

2- Reading and discussing the 2020 Activity Report of the Board of Directors

3- Reading the Report of the Independent Audit Company,

4- Reading, discussing and approving the financial statements of 2020,

5- Releasing of the members of the Board of Directors for 2020 transactions separately,

6- Discussing and settling the wages and daily allowances of the members of the Board of Directors,

7- Discussing and settling the decision about not distributing the profit for 2020 and adding 100.000.000,00 TL (One hundred million Turkish liras) to the Company Capital,

8- As a result of adding 100.000.000,00TL (One hundred Million Turkish Liras) of 2020 profit to the Company capital, increasing the company capital from 360.000.000,00 TL (Three hundred sixty Million Turkish Liras) to 460.000.000,00TL (Forty hundred sixty Million Turkish Liras),

9- Amending the Article 7 “Capital” of the Main Agreement of the company,

10- Discussing and resolving the premiums to be given to the bank personnel,

11- 1Releasing the Independent Auditor (Audit Company) for the 2020 operating period,

12- Selecting an Independent Auditor (Audit Company) for the 2021 operating period,

13- Granting the Board Members’ the permissions listed in Articles 395 and 396 of TCC,

14- Wishes, Requests, Closing.

NUROL YATIRIM BANKASI ANONİM ŞİRKETİ and SUBSIDIARIES INDEPENDENT AUDIT REPORT, CONSOLIDATED FINANCIAL TABLES and FOOTNOTES FOR THE FINANCIAL TABLES AS OF 31 DECEMBER 2020

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Ticari Sicil No: 479920
Mersis No: 0-4350-3032-600001

INDEPENDENT AUDITOR'S REPORT

To the Shareholders of Nurol Yatırım Bankası A.Ş.

Opinion

We have audited the consolidated financial statements of Nurol Yatırım Bankası A.Ş. and its subsidiaries ("the Group") which comprise the consolidated statement of financial position as at 31 December 2020, and the consolidated income statement, consolidated statement of comprehensive income, consolidated statement of changes in equity and consolidated statement of cash flows for the year then ended, and notes to the consolidated financial statements, including a summary of significant accounting policies.

In our opinion, the accompanying consolidated financial statements present fairly, in all material respects, the consolidated financial position of the Group as at 31 December 2020, and its consolidated financial performance and its consolidated cash flows for the year then ended in accordance with International Financial Reporting Standards (IFRS).

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs). Our responsibilities under those standards are further described in the Auditor's responsibilities for the audit of the consolidated financial statements section of our report. We are independent of the Group in accordance with the International Ethics Standards Board for Accountants' Code of Ethics for Professional Accountants (IESBA Code) together with the ethical requirements that are relevant to our audit of the consolidated financial statements in Turkey, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the IESBA Code. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Key audit matters

Key audit matters are those matters that, in our professional judgement, were of most significance in our audit of the financial statements of the current period. Key audit matters were addressed in the context of our audit of the financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

Key Audit Matter	How the matter is addressed in our audit
Recognition of impairment on financial assets in accordance with IFRS 9 "Financial Instruments" Standard and related significant disclosures	
As disclosed in disclosure 4.10, The Group recognizes expected credit losses of financial assets in accordance with IFRS 9. We considered the impairment of financial assets recognition in accordance with IFRS 9 as a key audit matter since: - Amount of on and off balance sheet items that are subject to expected credit loss calculation is material to the financial statements - There are complex and comprehensive requirements of IFRS 9 - The classification of the financial assets is based on the Bank's business model and characteristics of the contractual cash flows in accordance with IFRS 9 and the Group uses significant judgment on the assessment of the business model and identification of the complex contractual cash flow characteristics of financial instruments. - Policies implemented by the Group management include compliance risk to the regulations and other practices. - Re-structured processes of IFRS 9 are advanced and complex. - Judgements and estimates used in expected credit loss calculation are new, complex and comprehensive. - Disclosure requirements of IFRS 9 are comprehensive and complex	- Our audit procedures included among others include: - Evaluating the appropriateness of management's selection of accounting policies based on the requirements of IFRS 9, our business understanding and industry practice. - Identifying and testing relevant controls and new IT systems by involving Information technology and Process audit specialists - Evaluating the reasonableness of management's key judgements and estimates made in expected credit loss calculations, including selection of methods, models, assumptions and data sources and evaluating the appropriateness of management's selection of accounting policies based on the requirements of IFRS 9, our business understanding and industry practice - Evaluating the understanding and the control of the Group's business model assessment and the test on the contractual cash flows - Involving Financial risk management specialists to challenge significant assumptions / judgements relating to credit risk grading, significant increase in credit risk, definition of default, probability of default, macro-economic variables, and recovery rates and performing loan review from the selected samples - Assessing the completeness, accuracy and relevance of the data used for the calculation of expected credit loss - Evaluating the impact of the Covid-19 outbreak on staging of loans and macroeconomic parameters used in expected credit losses together with forward-looking estimates and significant assumptions. - Evaluating the appropriateness and tested the mathematical accuracy of Expected credit loss models applied - Evaluating the judgments and estimates used for the individually assessed financial assets - Evaluating the reasonableness of and tested the post-model adjustments. - Auditing of the IFRS 9 disclosures.

Responsibilities of Management and Board of Directors for the consolidated financial statements

The Management is responsible for the preparation and fair presentation of the consolidated financial statements in accordance with IFRSs, and for such internal control as management determines is necessary to enable the preparation of the consolidated financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the consolidated financial statements, the management is responsible for assessing the Group's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Group or to cease operations, or has no realistic alternative but to do so.

The Board of Directors are responsible for overseeing the Group's financial reporting process.

Auditor's responsibilities for the audit of the consolidated financial statements

Our objectives are to obtain reasonable assurance about whether the consolidated financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these consolidated financial statements.

As part of an audit in accordance with ISAs, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the consolidated financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Group's internal control.

- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the Board of Directors.

- Conclude on the appropriateness of the Board of Director's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the consolidated financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Group to cease to continue as a going concern.

- Evaluate the overall presentation, structure and content of the consolidated financial statements, including the disclosures, and whether the consolidated financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

- Obtain sufficient appropriate audit evidence regarding the financial information of the entities or business activities within the Group to express an opinion on the consolidated financial statements. We are responsible for the direction, supervision and performance of the Group audit. We remain solely responsible for our audit opinion.

We communicate with the Board of Directors regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide the Board of Directors with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

From the matters communicated with the Board of Directors we determine those matters that were of most significance in the audit of the consolidated financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

The engagement partner who supervised and concluded this independent auditor's report is Yaşar Bivas.

Güney Bağımsız Denetim ve Serbest Muhasebeci Mali Müşavirlik Anonim Şirketi
A member firm of Ernst &Young Global Limited

Yaşar Bivas, SMMM
Sorumlu Denetçi

22 February 2021
Istanbul, Turkey

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NUROL YATIRIM BANKASI ANONİM ŞİRKETİ CONSOLIDATED STATEMENT OF FINANCIAL POSITION AS OF 31 DECEMBER 2020

(Currency - In thousands of Turkish Lira)

	Note	Audited 31 December 2020	Audited 31 December 2019
Assets			
Cash and cash equivalents	6	390,227	473,645
Reserve deposits at Central Bank	7	128,832	149,683
Derivative financial assets		39,179	11,937
Financial assets measured at fair value through other comprehensive income	8	321,953	198,356
Loans and advances to customers	9	3,092,029	2,159,206
Property and equipment	11	13,843	7,131
Investment property	10	296,500	223,545
Intangible assets	12	8,594	4,811
Current tax assets	18	7,324	-
Deferred tax assets		7,602	8,741
Other assets		19,261	16,895
Total assets		**4,325,344**	**3,253,950**
Liabilities			
Funds borrowed	13	1,120,098	904,639
Debt securities issued	14	722,790	763,268
Other liabilities	16	1,635,898	987,772
Derivative financial liabilities		81,844	43,444
Subordinated debts	15	113,214	90,305
Provisions	17	32,510	22,352
Current tax liabilities		-	5,828
Total liabilities		**3,706,354**	**2,817,608**
Equity			
Share capital	20	360,000	300,000
Reserves		131,824	54,997
Retained earnings		127,166	81,345
Total equity		**618,990**	**436,342**
Total liabilities and equity		**4,325,344**	**3,253,950**

The accompanying notes are an integral part of these consolidated financial statements.

NUROL YATIRIM BANKASI ANONİM ŞİRKETİ STATEMENT OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME FOR THE YEAR ENDED 31 DECEMBER 2020

(Currency - In thousands of Turkish Lira)

	Note	Audited 1 January 31 December 2020	Audited 1 January 31 December 2018
Interest income	21	402,863	459,409
Interest expense	21	(184,309)	(250,381)
Net interest income		218,554	**209,028**
Fee and commission income	22	33,197	57,527
Fee and commission expense	22	(9,521)	(8,726)
Net fee and commission income		**23,676**	**48,801**
Net trading income / (loss)	23	**18,104**	**(73,937)**
Net gains/(losses) on financial assets/liabilities at fair value through profit or loss		*(58,248)*	*(64,787)*
Net gains/(losses) on derecognition of financial assets measured at fair value through other comprehensive income		*76,352*	*(9,150)*
		89	69
Other operating income	24	**24,813**	**12,918**
		43,006	**(61,019)**
Operating income		**285,236**	**196,810**
Net impairment/recoveries on financial assets	9	(65,914)	(24,029)
Other provision expenses	25	(14,562)	(17,415)
Personnel expenses	26	(25,842)	(25,150)
Depreciation and amortization		(7,357)	(4,955)
Administrative expenses	27	(41,441)	(38,056)
Profit before income tax		**130,120**	**87,205**
Income tax expense	18	(21,217)	(18,693)
Profit for the period		**108,903**	**68,512**
Other comprehensive income to be reclassified to profit or loss in subsequent periods			
Financial assets measured at fair value through other comprehensive income			
Gain / (Loss) arising during the period		80,188	33,398
Income tax relating to components of other comprehensive income	18	(6,443)	(279)
Other comprehensive income (loss) for the period, net of income tax		**73,745**	**33,119**
Total comprehensive income for the period		**182,648**	**101,631**

The accompanying notes are an integral part of these consolidated financial statements.

NUROL YATIRIM BANKASI ANONİM ŞİRKETİ CONSOLIDATED STATEMENT OF CHANGES IN EQUITY FOR THE YEAR ENDED 31 DECEMBER 2020

(Currency - In thousands of Turkish Lira)

Audited	Note	Share capital	Fair value reserve of financial assets at fair value through other comprehensive income	Legal reserves	Retained earnings	Total equity
Balances at 1 January 2019		**160,000**	**11,909**	**7,374**	**75,428**	**254,711**
Transfer to reserves		**-**	-	**2,595**	**(2,595)**	-
Capital Increase		**140,000**	-	-	**(60,000)**	**80,000**
Internal Resources		60,000	-	-	**(60,000)**	-
Cash Resources		80,000	-	-	-	**80,000**
Total comprehensive income for the period		-	-	-	-	**-**
- Profit for the period		-	-	-	68,512	68,512
- Other comprehensive income for the period, net0 of tax		-	33,119	-	-	33,119
Total comprehensive income for the period		-	**33,119**	-	**68,512**	**101,631**
Balance at 31 December 2019		**300,000**	**45,028**	**9,969**	**81,345**	**436,342**
Audited						
Balances at 1 January 2020		**300,000**	**45,028**	**9,969**	**81,345**	**436,342**
Transfer to reserves		-	-	**3,082**	**(3,082)**	-
Capital Increase		**60,000**	-	**-**		-
Internal Resources		60,000	-	-	(60,000)	-
Increase / Decrease Due to Other Changes		-	-	**-**	**(60,000)**	-
Total comprehensive income for the period		-	-	**-**	-	-
- Profit for the period		-	-	-	-	108,903
- Other comprehensive income for the period, net of tax		-	73,745	-	108,903	73,745
					-	
Total comprehensive income for the period		-	**73,745**	-	**108,903**	**182,648**
Balance at 31 December 2020		**360,000**	**118,773**	**13,051**	**127,166**	**618,990**

The accompanying notes are an integral part of these consolidated financial statements.

NUROL YATIRIM BANKASI ANONİM ŞİRKETİ CONSOLIDATED STATEMENT OF CASH FLOWS FOR THE YEAR ENDED 31 DECEMBER 2020

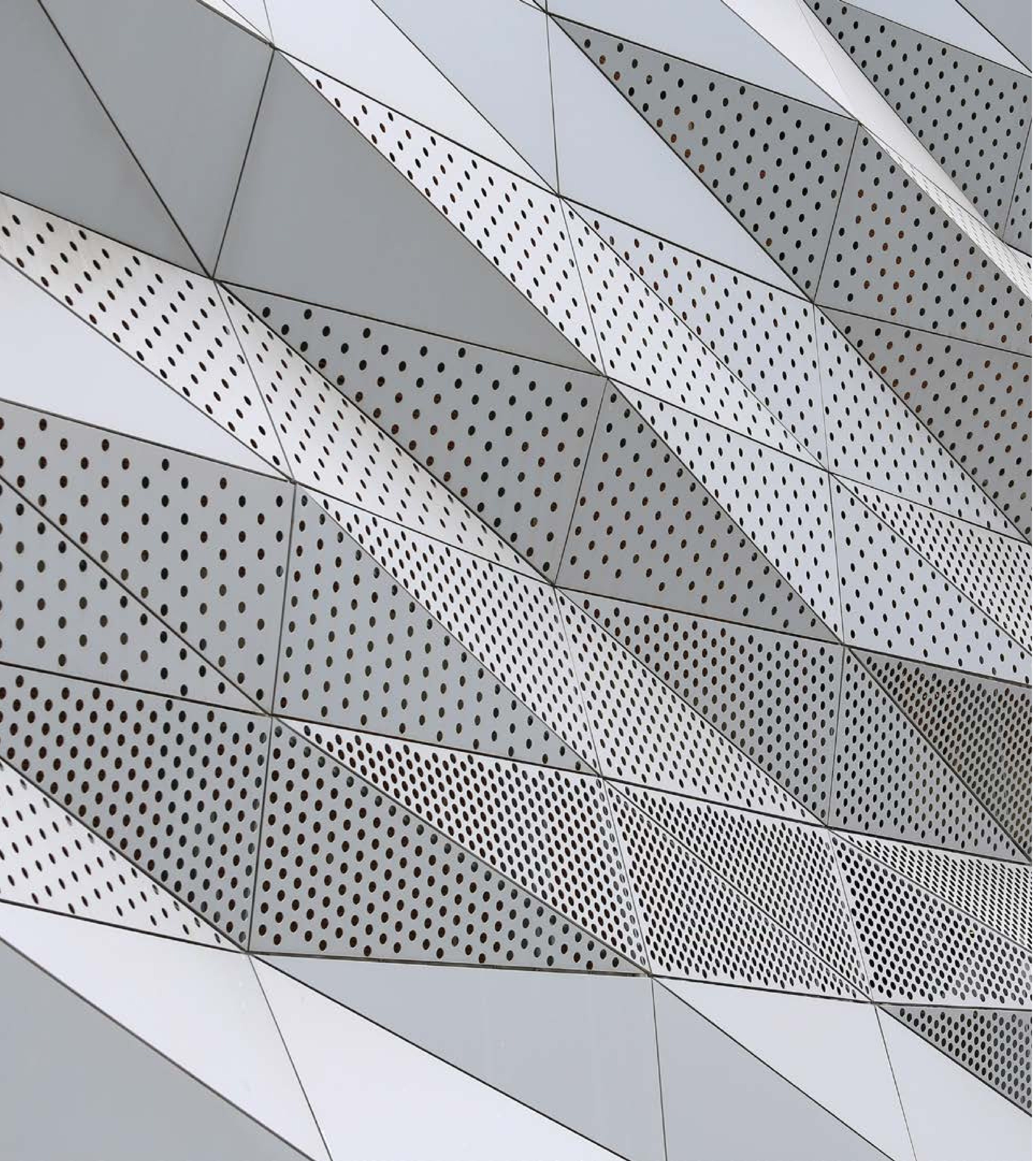
(Currency - In thousands of Turkish Lira)

	Note	Audited 1 January 31 December 2020(*)	Audited 1 January 31 December 2019(*)
Cash flows from operating activities			
Net profit for the period		108,903	68,512
Adjustments:			
Depreciation and amortisation		7,357	4,955
Current tax expense	*18*	26,521	25,681
Deferred tax (income)/expense	*18*	(5,304)	(6,988)
Provision for loan losses	*9*	65,914	24,029
Other provisions		14,562	17,415
Other accruals		(1,251)	(15,021)
Foreign exchange loss / (gain)		(128,836)	(22,722)
Fair value gain on investment property		(9,563)	(4,169)
		78,303	**91,692**
Changes in operating assets and liabilities			
Change in derivative financial assets		(27,242)	12,992
Change in loans and advances to customers		(1,168,965)	(475,230)
Change in reserve deposits		21,321	169,885
Change in other assets		(75,285)	5,632
Change in other liabilities		786,648	420,119
Change in derivative financial liabilities		38,400	6,187
Change in borrowings		234,603	(3,905)
Taxes paid		(43,996)	(18,728)
Net cash provided by / (used in) operating activities		**(234,516)**	**116,952**
Cash flows from investing activities			
Purchase of financial assests measured at fair value through other comprehensive income		(11,353,889)	(6,173,688)
Sale of financial assests measured at fair value through other comprehensive income		11,311,752	6,090,010
Purchase of property and equipment		(5,065)	(1,525)
Purchase of intangible assets		(6,590)	(4,347)
Net cash (used in) / provided by investing activities		**(53,792)**	**(89,550)**
Proceeds from debt securities issued		5,743,974	5,046,664
Repayment from debt securities issued		(5,744,146)	(5,023,733)
Payment of lease liabilities		(2,077)	-
Net cash provided by /(used in) financing activities		**(2,249)**	**(22,931)**
Effect of foreign exchange rate change on cash and cash equivalents		**128,836**	**22,722**
Net increase in cash and cash equivalents		**(83,418)**	**164,747**
Cash and cash equivalents at 1 January	*6*	473,645	308,898
Cash and cash equivalents at 31 December	*6*	**390,227**	**473,645**

(*) Cash flows from interest received and paid disclosed together. Interest received is amounting to TL 423,271 (31 December 2019: 434,579) and interest paid is amounting to TL 205,246 (31 December 2019: 239,682).

The accompanying notes are an integral part of these financial statements.

(Currency - In thousands of Turkish Lira)



1. Corporate information

General

Nurol Yatırım Bankası A.Ş. (the "Bank" or "Nurolbank") was established in 1998 by the permission of the council of Ministers Decree No. 98/11565 dated 6 August 1998, to finance investment and foreign trade activities, and started its financial banking activities in May 1999. Nurolbank is owned controlled by the Nurol Holding A.Ş.

Nurol Varlık Kiralama A.Ş. is established in 2017 to operate in asset leasing sector. Nurol Varlık Kiralama A.Ş. has been registered in trade register as of June 14, 2017 and published in Turkey Trade Registry Gazette numbered 9351 dated 20 September 2017. Nurol Varlık Kiralama A.Ş.'s paid in capital is amounting to TL 50 as of December 31, 2020.

Nurol Portföy Yönetim A.Ş is established in 2020 to operate in portfolio management services sector and has been registered in trade register as of December 17, 2020 and published in Turkey Trade Registry Gazette numbered 10226 dated 17 December 2020. Nurol Portföy Yönetim A.Ş's paid in capital is amounting to 3,000 TL and paid all by Nurol Yatırım Bankası A.Ş. As of 31 December 2020, activity permit has not been obtained.

Nature of Activities of the Group

The Group activities include investment banking and corporate services such as asset and financial leasing, lending and trade finance.

Nurolbank operates as an investment bank and according to the current legislation for investment banks, the Bank is not authorised to receive deposits from customers. The Bank's head office is located at Nurol Plaza in Maslak in İstanbul, Turkey.

The shareholders' structure of the Bank is as disclosed below:

Shareholders	Total nominal value of the shares	Share percentage (%)
Nurol Holding A.Ş.	284,337	78.98
Nurol İnşaat ve Tic. A.Ş.	60,134	16.70
Others	15,529	4.32

The Parent Bank have capital increase 60,000 TL during the current period (January 1- December 31, 2019: The Parent Bank's paid in capital has been increased by TL 140,000 provided from cash and internal resources).

The shareholder having direct or indirect control over the shares of the Bank is Nurol Group. Nurol Group has operations in construction, defence, finance, tourism, health, mining, real estate, marketing and manufacturing industries through 33 firms within the Nurol Group 4 joint ventures and 11 domestic-foreign associates and subsidiaries.

2. The new standards, amendments and interpretations

The accounting policies adopted in preparation of the consolidated financial statements as at 31 December 2020 are consistent with those of the previous financial year, except for the adoption of new and amended IFRS and IFRIC interpretations effective as of 1 January 2020. The effects of these standards and interpretations on the Group's financial position and performance have been disclosed in the related paragraphs.

i) The new standards, amendments and interpretations which are effective as at 1 January 2020 are as follows:

Definition of a Business (Amendments to IFRS 3)

In October 2018, the IASB issued amendments to the definition of a business in IFRS 3 Business Combinations. The amendments are intended to assist entities to determine whether an acquired set of activities assets is a business or not.

The amendments:
- clarify the minimum requirements for a business;
- remove the assessment of whether market participants are capable of replacing any missing elements;
- add guidance to help entities assess whether an acquired process is substantive;
- narrow the definitions of a business and of outputs; and
- introduce an optional fair value concentration test.

The amendments to IFRS 3 are effective for annual reporting periods beginning on or after 1 January 2020 and apply prospectively.

The amendments are not applicable for the Group and did not have an impact on the financial position or performance of the Group.

Amendments to IFRS 9, IAS 39 and IFRS 7- Interest Rate Benchmark Reform

The amendments issued to IFRS 9 and IAS 39 which are effective for periods beginning on or after 1 January 2020 provide reliefs which enable hedge accounting to continue. For these reliefs, it is assumed that the benchmark on which the cash flows of hedged risk or item are based and/or, the benchmark on which the cash flows of the hedging instrument are based, are not altered as a result of IBOR reform. in connection with interest rate benchmark reform.

Reliefs used as a result of amendments in IFRS 9 and IAS 39 is aimed to be disclosed in financial statements based on the amendments made in IFRS 7.

The amendments did not have a significant impact on the financial position or performance of the Group.

NUROL YATIRIM BANKASI ANONİM ŞİRKETİ NOTES TO THE CONSOLIDATED STATEMENT AS OF AND FOR THE YEAR ENDED 31 DECEMBER 2020

(Currency - In thousands of Turkish Lira)

2. The new standards, amendments and interpretations (continued)

Definition of Material (Amendments to IAS 1 and IAS 8)

In October 2018, the IASB issued amendments to IAS 1 Presentation of Financial Statements and IAS 8 Accounting Policies, Changes in Accounting Estimates and Errors to align the definition of 'material' across the standards and to clarify certain aspects of the definition. The new definition states that, 'Information is material if omitting, misstating or obscuring it could reasonably be expected to influence decisions that the primary users of general purpose financial statements make on the basis of those financial statements, which provide financial information about a specific reporting entity. The amendments clarify that materiality will depend on the nature or magnitude of information, or both. An entity will need to assess whether the information, either individually or in combination with other information, is material in the context of the financial statements.

The amendments to IAS 1 and IAS 8 are required to be applied for annual periods beginning on or after 1 January 2020.

The amendments did not have a significant impact on the financial position or performance of the Group.

Amendments to IFRS 16 – Covid-19 Rent Related Concessions

In May 2020, the IASB issued amendments to IFRS 16 Leases to provide relief to lessees from applying IFRS 16 guidance on lease modifications to rent concessions arising a direct consequence of the Covid-19 pandemic. A lessee that makes this election accounts for any change in lease payments related rent concession the same way it would account for the change under the standard, if the change were not a lease modification.

The practical expedient applies only to rent concessions occurring as a direct consequence of the Covid-19 pandemic and only if all of the following conditions are met:

- The change in lease payments results in revised consideration for the lease that is substantially the same as, or less than, the consideration for the lease immediately preceding the change.
- Any reduction in lease payments affects only payments originally due on or before 30 June 2021
- There is no substantive change to other terms and conditions of the lease.

A lessee will apply the amendment for annual reporting periods beginning on or after 1 June 2020. Early application of the amendments is permitted.

The amendments are not applicable for the Group and did not have an impact on the financial position or performance of the Group.

ii) Standards issued but not yet effective and not early adopted

Standards, interpretations and amendments to existing standards that are issued but not yet effective up to the date of issuance of the consolidated financial statements are as follows. The Group will make the necessary changes if not indicated otherwise, which will be affecting the consolidated financial statements and disclosures, when the new standards and interpretations become effective.

IFRS 10 and IAS 28: Sale or Contribution of Assets between an Investor and its Associate or Joint Venture (Amendments)

In December 2015, the IASB postponed the effective date of this amendment indefinitely pending the outcome of its research project on the equity method of accounting. Early application of the amendments is still permitted. The Group will wait until the final amendment to assess the impacts of the changes.

2. The new standards, amendments and interpretations (continued)

IFRS 17 - The new Standard for insurance contracts

The IASB issued IFRS 17, a comprehensive new accounting standard for insurance contracts covering recognition and measurement, presentation and disclosure. IFRS 17 model combines a current balance sheet measurement of insurance contract liabilities with the recognition of profit over the period that services are provided. Certain changes in the estimates of future cash flows and the risk adjustment are also recognised over the period that services are provided. Entities will have an option to present the effect of changes in discount rates either in profit and loss or in OCI. The standard includes specific guidance on measurement and presentation for insurance contracts with participation features. IFRS 17 will become effective for annual reporting periods beginning on or after 1 January 2023; early application is permitted.

The standard is not applicable for the Group and will not have an impact on the financial position or performance of the Group.

Amendments to IAS 1- Classification of Liabilities as Current and Non-Current Liabilities

23 January 2020, the IASB issued amendments to IAS 1 Presentation of Financial Statements. The amendments issued to IAS 1 which are effective for periods beginning on or after 1 January 2023, clarify the criteria for the classification of a liability as either current or non-current. Amendments must be applied retrospectively in accordance with IAS 8 Accounting Policies, Changes in Accounting Estimates and Errors. Early application is permitted.

The amendments are not applicable for the Group and will not have an impact on the financial position or performance of the Group.

Amendments to IFRS 3 – Reference to the Conceptual Framework

In May 2020, the IASB issued amendments to IFRS 3 Business combinations. The amendments are intended to replace to a reference to a previous version of the IASB's Conceptual Framework (the 1989 Framework) with a reference to the current version issued in March 2018 (the Conceptual Framework) without significantly changing requirements of IFRS 3. At the same time, the amendments add a new paragraph to IFRS 3 to clarify that contingent assets do not qualify for recognition at the acquisition date. The amendments issued to IFRS 3 which are effective for periods beginning on or after 1 January 2022 and must be applied retrospectively. Earlier application is permitted if, at the same time or earlier, an entity also applies all of the amendments contained in the Amendments to References to the Conceptual Framework in IFRS standards (March 2018).

The amendments are not applicable for the Group and will not have an impact on the financial position or performance of the Group.

Amendments to IAS 16 – Proceeds before intended use

In May 2020, the IASB issued amendments to IAS 16 Property, plant and equipment. The amendment prohibits entities from deducting from the cost of an item of property, plant and equipment (PP&E), any proceeds of the sale of items produced while bringing that asset to the location and condition necessary for it to be capable of operating in the manner intended by management. Instead, an entity recognizes the proceeds from selling such items, and costs of producing those items, in profit or loss. The amendments issued to IAS 16 which are effective for periods beginning on or after 1 January 2022. Amendments must be applied prospectively only to items of PP&E made available for use on or after beginning of the earliest period presented when the entity first applies the amendment.

There is no transition relief for the first time adopters.

The amendments are not applicable for the Group and will not have an impact on the financial position or performance of the Group.

NUROL YATIRIM BANKASI ANONİM ŞİRKETİ NOTES TO THE CONSOLIDATED STATEMENT AS OF AND FOR THE YEAR ENDED 31 DECEMBER 2020

(Currency - In thousands of Turkish Lira)

2. The new standards, amendments and interpretations (continued)

Amendments to IAS 37 – Onerous contracts – Costs of Fulfilling a Contract

In May 2020, the IASB issued amendments to IAS 37 Provisions, Contingent Liabilities and Contingent assets. . The amendments issued to IAS 37 which are effective for periods beginning on or after 1 January 2022, to specify which costs an entity needs to include when assessing whether a contract is onerous or loss-making and also apply a "directly related cost approach". Amendments must be applied retrospectively to contracts for which an entity has not fulfilled all of its obligations at the beginning of the annual reporting period in which it first applies the amendments (the date of initial application). Earlier application is permitted and must be disclosed.

The amendments are not applicable for the Group and will not have an impact on the financial position or performance of the Group.

Interest Rate Benchmark Reform – Phase 2 – Amendments to IFRS 9, IAS 39, IFRS 7, IFRS 4 and IFRS 16

In August 2020, the IASB issued Interest Rate Benchmark Reform – Phase 2, Amendments to IFRS 9, IAS 39, IFRS 7, IFRS 4 and IFRS 16 to provide temporary reliefs which address the financial reporting effects when an interbank offering rate (IBOR) is replaced with an alternative nearly risk-free rate (RFR, amending the followings:

Practical expedient for changes in the basis for determining the contractual cash flows as a result of IBOR reform

The amendments include a practical expedient to require contractual changes, or changes to cash flows that are directly required by the reform, to be treated as changes to a floating interest rate, equivalent to a movement in a market rate of interest. Under this practical expedient, if the interest rates applicable to financial instruments change as a result of the IBOR reform, the situation is not considered as a derecognition or contract modification; instead, this would be determined by recalculating the carrying amount of the financial instrument using the original effective interest rate to discount the revised contractual cash flows.

The practical expedient is required for entities applying IFRS 4 Insurance Contracts that are using the exemption from IFRS 9 Financial Instruments (and, therefore, apply IAS 39 Financial Instruments: Classification and Measurement) and for IFRS 16 Leases, to lease modifications required by IBOR reform.

Relief from discontinuing hedging relationships

- The amendments permit changes required by IBOR reform to be made to hedge designations and hedge documentation without the hedging relationship being discontinued.

- Amounts accumulated in the cash flow hedge reserve are deemed to be based on the RFR.

- For the IAS 39 assessment of retrospective hedge effectiveness, on transition to an RFR, entities may elect on a hedge-by-hedge basis, to reset the cumulative fair value changes to zero.

The amendments provide relief for items within a designated group of items (such as those forming part of a macro cash flow hedging strategy) that are amended for modifications directly required by IBOR reform. The reliefs allow the hedging strategy to remain and not be discontinued.

- As instruments transition to RFRs, a hedging relationship may need to be modified more than once. The phase two reliefs apply each time a hedging relationship is modified as a direct result of IBOR reform.

2. The new standards, amendments and interpretations (continued)

Separately identifiable risk components

The amendments provide temporary relief to entities from having to meet the separately identifiable requirement when an RFR instrument is designated as a hedge of a risk component.

Additional disclosures

Amendments need additional IFRS 7 Financial Instruments disclosures such as; How the entity is managing the transition to RFRs, its progress and the risks to which it is exposed arising from financial instruments due to IBOR reform, quantitative information about financial instruments that have yet to transition to RFRs and if IBOR reform has given rise to changes in the entity's risk management strategy, a description of these changes.

The amendments are mandatory, with earlier application permitted. While application is retrospective, an entity is not required to restate prior periods.

iii) Annual Improvements – 2018–2020 Cycle

In May 2020, the IASB issued Annual Improvements to IFRS Standards 2018–2020 Cycle, amending the followings:

- IFRS 1 First-time Adoption of International Financial Reporting Standards – Subsidiary as a first-time adopter: The amendment permits a subsidiary to measure cumulative translation differences using the amounts reported by the parent. The amendment is also applied to an associate or joint venture.
- IFRS 9 Financial Instruments – Fees in the "10 per cent test" for derecognition of financial liabilities: The amendment clarifies the fees that an entity includes when assessing whether the terms of a new or modified financial liability are substantially different from the terms of the original financial liability. These fees include only those paid or received between the borrower and the lender, including fees paid or received by either borrower or lender on the other's behalf.

IAS 41 Agriculture – Taxation in fair value measurements: The amendment removes the requirement in paragraph 22 of IAS 41 that entities exclude cash flows for taxation when measuring fair value of assets within the scope of IAS 41.

Improvements are effective for annual reporting periods beginning on or after 1 January 2022.Earlier application is permitted for all.

The amendments are not applicable for the Group and will not have an impact on the financial position or performance of the Group.

(Currency - In thousands of Turkish Lira)

3. Consolidation

3.1 Basis of Consolidation

The consolidated financial statements incorporate the financial statements of the Parent Bank and its subsidiary, which is the entity controlled by the Parent Bank. Control is achieved when the Group is exposed, or has rights, to variable returns from its involvement with the investee and has the ability to affect those returns through its power over the investee. When necessary, adjustments are made to the consolidated financial statements of subsidiary to bring their accounting policies into line with those of the Group. Nurol Yatırım Bankası A.Ş. has 100% ownership of Nurol Varlık Kiralama A.Ş and 100% ownership of Nurol Portföy Yönetim A.Ş.

All intra-group transactions, balances, income and expenses are eliminated in full on consolidation.

4. Significant accounting policies

4.1 Statement of compliance

The consolidated financial statements have been prepared in accordance with international Financial Reporting Standards (“IFRS”) as issued by the international Accounting Standards Board (“IASB”).
The Parent Bank maintains its book of account and prepares their statutory consolidated financial statements in Turkish Lira (“TL”) in accordance with the accounting principles as promulgated by the Banking Regulation and Supervision Agency (“BRSA”), Capital Markets Board of Turkey, the Turkish Commercial Code and tax legislation. The accompanying consolidated financial statements are derived from statutory consolidated financial statements with adjustments and reclassifications for the purpose of fair presentation in accordance with IFRS. The subsidiary maintains its books of accounts based on statutory rules and regulations applicable in its jurisdiction. The accompanying consolidated financial statements are derived from statutory financial statements with adjustments and reclassifications For the purpose of fair presentation in accordance with IFRS. The consolidated financial statements were authorised for issue by the Group’s management on 22 February 2021.

The ongoing COVID-19 pandemic, which has recently emerged in China, has spread to various countries in the world, causing potentially fatal respiratory infections, negatively affects both regional and global economic conditions, as well as it causes disruptions in operations, especially countries that are exposed to the epidemic. As a result of the spread of COVID-19 around the world, several measures have been taken in Turkey as well as in the world in order to prevent the spread of the virus and measures are still being taken. In addition to these measures, economic measures are also taken to minimize the economic impact of the virus outbreak on individuals and businesses in Turkey and worldwide.

Since it is aimed to update the most recent financial information in the interim financial statements prepared as of December 31, 2020, considering the magnitude of the economic changes due to COVID-19, the Group made certain estimates in the calculation of expected credit losses in footnote numbered IX.

4.2 Basis of measurement

The consolidated financial statements have been prepared on historical cost basis except for the following which are measured at fair value:
- derivative financial instruments
- financial instruments measured at fair value through profit or loss,
- financial instruments measured at fair value through other comprehensive income,
- Investment property

4. Significant accounting policies (continued)

4.3 Foreign currency transactions

Transactions in currencies other than TL (foreign currencies) are recorded at the rates of exchange prevailing on the dates of the transactions. At each balance sheet date, monetary items denominated in foreign currencies are retranslated at the rates prevailing on the balance sheet date. Non-monetary items carried at fair value that are denominated in foreign currencies are retranslated at the rates prevailing on the date when the fair value was determined. Non-monetary items that are measured in terms of historical cost in a foreign currency are not retranslated. Foreign currency differences arising on retranslation are recognised in profit or loss.

Foreign currency translation rates used by the Group are as follows:

	USD / TL (full)	EUR / TL (full)
31 December 2020	**7,4194**	**9,1164**
31 December 2019	5,9400	6,6621

4.4 Interest income and interest expense

Interest income and expense are recognised in the profit or loss using the effective interest method. Interest income is recorded according to the effective interest rate method (rate equal to net present value of future cash flows or financial assets and liabilities) defined in the IFRS 9 “Financial Instruments” standard by applying the effective interest rate to the gross carrying amount of a financial asset except for: purchased or originated credit-impaired financial assets or financial assets that are not purchased or originated credit-impaired financial assets but subsequently have become credit-impaired financial assets.

If the financial asset is impaired and classified as a non-performing receivable, the Parent Bank applies the effective interest rate on the amortized cost of the asset for subsequent reporting periods. Such interest income calculation is made on an individual contract basis for all financial assets subject to impairment calculation. It is used effective interest rate during calculation of loss given default rate in expected credit loss models and accordingly, the calculation of expected credit losses includes an interest amount. If the credit risk of the financial instrument improves to the extent that the financial asset is no longer considered as impaired and the improvement can be attributed to an incident that eventually takes place (such as an increase in the loan’s credit rating), interest income at subsequent reporting periods are calculated by applying the effective interest rate to the gross amount.

Interest income and expense presented in the statement of comprehensive income statement include:

- The interest income on financial assets and liabilities at amortized cost on an effective interest rate basis
- The interest income on held for trading investments and fair value through other comprehensive income investments.

4. Significant accounting policies (continued)

4.5 Fees and commission

Except for fees and commissions that are integral part of the effective interest rates of financial instruments measured at amortized costs, the fees and commissions are accounted for in accordance with IFRS 15 Revenue from Contracts with Customers. Except for certain fees related with certain banking transactions and recognized when the related service is given, fees and commissions received or paid, and other fees and commissions paid to financial institutions are accounted under accrual basis of accounting throughout the service period. Income from asset purchases to a third party or by natural or legal persons contracts are recognized in the period they occur.

4.6 Net trading income

Net trading income comprises gains less loss related to derivative financial and liabilities, and includes all realised and unrealised fair value changes and interest. Any realised or unrealised fair value changes and interest of derivative financial assets and liabilities are recorded as trading income.

4.7 Dividends

Dividends are recognised when the shareholders' right to receive the payments is established.

4.8 Taxation and deferred income taxes

Income tax expense represents the sum of the tax currently payable and deferred tax.

Current tax

The tax currently payable is based on taxable profit for the year. Taxable profit differs from profit as reported in the income statement because it excludes items of income or expense that are taxable or deductible in other years and it further excludes items that are never taxable or deductible. The liability for current tax is calculated using tax rates that have been enacted or substantively enacted by the balance sheet date.

Deferred tax

Deferred tax is recognized on temporary differences between the carrying amounts of assets and liabilities in the financial statements and the corresponding tax bases which are used in the computation of taxable profit. Deferred tax liabilities are generally recognized for all taxable temporary differences and deferred tax assets are recognized for all deductible temporary differences to the extent that it is probable that taxable profits will be available against which those deductible temporary differences can be utilized. Such deferred tax assets and liabilities are not recognized if the temporary difference arises from goodwill or from the initial recognition (other than in a business combination) of other assets and liabilities in a transaction that affects neither the taxable profit nor the accounting profit.

The carrying amount of deferred tax assets is reviewed at each balance sheet date and reduced to the extent that it is no longer probable that sufficient taxable profits will be available to allow all or part of the asset to be recovered.

Deferred tax assets and liabilities are measured at the tax rates that are expected to apply in the period in which the liability is settled or the asset realized, based on tax rates (and tax laws) that have been enacted or substantively enacted by the balance sheet date. The measurement of deferred tax liabilities and assets reflects the tax consequences that would follow from the manner in which the Group expects, at the reporting date, to recover or settle the carrying amount of its assets and liabilities.

Deferred tax assets and liabilities are offset when there is a legally enforceable right to set off current tax assets against current tax liabilities and when they relate to income taxes levied by the same taxation authority and the Group intends to settle its current tax assets and liabilities on a net basis.

NUROL YATIRIM BANKASI ANONİM ŞİRKETİ NOTES TO THE CONSOLIDATED STATEMENT AS OF AND FOR THE YEAR ENDED 31 DECEMBER 2020

(Currency - In thousands of Turkish Lira)

4. Significant accounting policies (continued)

Current and deferred tax for the period

Current and deferred tax are recognized as an expense or income in profit or loss, except when they relate to items that are recognized outside profit or loss (whether in other comprehensive income or directly in equity), in which case the tax is also recognized outside profit or loss, or where they arise from the initial accounting for a business combination. In the case of a business combination, the tax effect is taken into account in calculating goodwill or determining the excess of the acquirer's interest in the net fair value of the acquiree's identifiable assets, liabilities and contingent liabilities over cost.

4.9 Financial instruments

Initial recognition of financial instruments

The Parent Bank shall recognize a financial asset or a financial liability in its statement of financial position when, and only when, the entity becomes party to the contractual provisions of the instrument. A regular way purchase or sale of financial assets shall be recognized and derecognized, as applicable, using trade date accounting or settlement date accounting. Purchase and sale transactions of securities are accounted.

Initial measurement of financial instruments

The classification of financial instruments at initial recognition depends on the contractual conditions and the relevant business model. Except for the assets in the scope of IFRS 15 Revenue from contracts with customers, at initial recognition, the Parent Bank measures financial asset or financial liabilities at fair value plus or minus, in the case of a financial asset or financial liability not at fair value through profit/loss, transaction costs that are directly attributable to the acquisition or issue of the financial asset or financial liability.

Classification of financial instruments

On which category a financial instruments shall be classified at initial recognition depends on both the business model for managing the financial assets and the contractual cash flow characteristics of the financial asset.

As per IFRS 9, the Parent Bank classifies a financial asset on the basis of its contractual cash flow characteristics if the financial asset is held within a business model whose objective is to hold assets to collect contractual cash flows or within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets. In order to assess whether the element provides consideration for only the passage of time, an entity applies judgement and considers relevant factors such as the currency in which the financial asset is denominated and the period for which the interest rate is set.

When the contractual conditions are exposed to the risks which are not consistent with the basic lending arrangement or variability of cash flows, the relevant financial asset is measured at fair value through profit or loss. The Parent Bank tested all financial assets whether their "contractual cash-flows solely represent payments of principal and interest" and assessed the asset classification within the business model.

Assessment of business model

As per IFRS 9, the Parent Bank's business model is determined at a level that reflects how groups of financial assets are managed together to achieve a particular business objective. The Parent Bank's business models are divided into three categories.

4. Significant accounting policies (continued)

4.9 Financial instruments (continued)

Business model aimed to hold assets in order to collect contractual cash flows

This is a model whose objective is to hold assets in order to collect contractual cash flows are managed to realise cash flows by collecting contractual payments over the life of the instrument. The financial assets that are held within the scope of this business model are measured at amortized cost when the contractual terms of the financial asset meet the condition of giving rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding. Receivables from the Central Bank, Banks, Money Market Placements, investments under financial assets measured at amortized cost, loans, leasing receivables, factoring receivables and other receivables are assessed within this business model.

Business model aimed to collect contractual cash flows and sell financial assets

This is a model whose objective is achieved by both collecting contractual cash flows and selling financial assets: the Parent Bank may hold financial assets in a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets. Fair value change of the financial assets that are held within the scope of this business model are accounted under other comprehensive income when the contractual terms of the financial asset meet the condition of giving rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding. Financial Assets Measured at Fair Value through Other Comprehensive Income are assessed in this business model.

Other business models

Financial assets are measured at fair value through profit or loss when they are not held within a business model whose objective is to hold assets to collect contractual cash flows or within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets. Financial assets measured at fair value through profit/loss are assessed in this business model.

4.9.1 Financial assets

Financial assets are classified in three main categories as listed below:

- Financial assets measured at fair value through profit/loss
- Financial assets measured at fair value through other comprehensive income and
- Financial assets measured at amortized cost

Financial assets at the fair value through profit or loss

Financial assets at fair value through profit/loss are financial assets other than the ones that are managed with business model that aims to hold to collect contractual cash flows or business model that aimes to collect both the contractual cash flows and cash flows arising from the sale of the assets; and if the contractual terms of the financial asset do not lead to cash flows representing solely payments of principal and interest at certain date; that are either acquired for generating a profit from short-term fluctuations in prices or are financial assets included in a portfolio aiming to short-term profit making. Financial assets at the fair value through profit or loss are initially recognized at fair value and measured at their fair value after recognition. All gains and losses arising from these valuations are reflected in the income statement.

4. Significant accounting policies (continued)

4.9.1 Financial assets (continued)

Financial Assets at Fair Value Through Other Comprehensive Income

In addition to Financial assets within a business model that aims to hold to collect contractual cash flows and aims to hold to sell, financial asset with contractual terms that lead to cash flows are solely payments of principal and interest at certain dates, they are classified as fair value through other comprehensive income. Financial assets at fair value through other comprehensive income are recognized by adding transaction cost to acquisition cost reflecting the fair value of the financial asset. After the recognition, financial assets at fair value through other comprehensive income are measured at fair value. Interest income calculated with effective interest rate method arising from financial assets at fair value through other comprehensive income and dividend income from equity securities are recorded to income statement.

“Unrealized gains and losses” arising from the difference between the amortized cost and the fair value of financial assets at fair value through other comprehensive income are not reflected in the income statement of the period until the acquisition of the asset, sale of the asset, the disposal of the asset, and impairment of the asset and are accounted under the “Other comprehensive income/expense items to be recycled to profit/loss” under shareholders’ equity. Equity securities, which are classified as financial assets at fair value through other comprehensive income, that have a quoted market price in an active market and whose fair values can be reliably measured are carried at fair value. Equity securities that do not have a quoted market price in an active market and whose fair values cannot be reliably measured are carried at cost, less provision for impairment.

Financial Assets Measured at Amortized Cost

Financial assets that are held for collection of contractual cash flows where those cash flows represent solely payments of principal and interest are classified as financial assets measured at amortized cost. Financial assets measured at amortized cost are initially recognized at acquisition cost including the transaction costs which reflect the fair value of those instruments and subsequently recognized at amortized cost by using effective interest rate method. Interest income obtained from financial assets measured at amortized cost is accounted in income statement.

Loans and Advances to Customers

Loans are financial assets that have fixed or determinable payments terms and are not quoted in an active market. Loans are initially recognized at acquisition cost plus transaction costs presenting their fair value and thereafter measured at amortized cost using the “Effective Interest Rate (internal rate of return) Method”.
All loans of the Parent Bank has classified under Measured at Amortized Cost, after loan portfolio passed the test of “All cash flows from contracts are made only by interest and principal” during the transition period.

Due from banks

Due from banks are non-derivative financial assets with fixed or determinable payments that are not quoted in an active market and that the Group does not intend to sell immediately or in the near term.

When the Group purchases a financial asset and simultaneously enters into an agreement to resell the asset (or a substantially similar asset) at a fixed price on a future date (“reverse repo or stock borrowing”), the arrangement is accounted for as amounts due from banks, and the underlying asset is not recognised in the Group’s financial statements.

Due from banks are initially measured at fair value plus incremental direct transaction costs, and subsequently measured at their amortised cost using the effective interest method.

4. Significant accounting policies (continued)

4.9.1 Financial assets (continued)

Repossessed assets

As part of its treatment of defaulted loans and guarantees, the Group in a number of cases takes over assets as security for such exposures. Upon repossession the assets are valued at their presumed realisable value. Any deviation from the carrying value of a defaulted or written down exposure upon takeover is classified as a loan write-down. Repossessed assets are carried according to type. Upon final disposal, the deviation from carrying value is entered in profit or loss based on the asset’s type in the accounts.

Cash and cash equivalents

Cash and cash equivalents comprise cash on hand and demand deposits and other short-term highly liquid investments which their maturities are three months or less from date of acquisition and that are readily convertible to a known amount of cash and are subject to an insignificant risk of changes in value.

4.9.2 Financial liabilities

Financial liabilities and equity instruments issued by the Group are classified according to the substance of the contractual arrangements entered into and the definitions of a financial liability and an equity instrument. An equity instrument is any contract that evidences a residual interest in the assets of the Group after deducting all of its liabilities. The accounting policies adopted for specific financial liabilities and equity instruments are set out below.

Financial liabilities are classified as either financial liabilities at FVTPL or other financial liabilities.

Financial liabilities at fair value through profit or loss

Financial liabilities are classified as at FVTPL where the financial liability is either held for trading or it is designated as at FVTPL. Financial liabilities at FVTPL are stated at fair value, with any resultant gain or loss recognized in profit or loss. The net gain or loss recognized in profit or loss incorporates any interest paid on the financial liability.

Other financial liabilities

Other financial liabilities, including funds borrowed, are initially measured at fair value, net of transaction costs.

Other financial liabilities are subsequently measured at amortized cost using the effective interest method plus the interest expense recognized on an effective yield basis.

Deposits, funds borrowed and debt securities issued

The Group is not entitled to collect deposits. Current accounts of loan customers and funds borrowed are the Group’s sources of debt funding.

Current accounts of loan customers and funds borrowed are initially measured at fair value plus incremental direct transaction costs, and subsequently measured at their amortised cost using the effective interest method.

4. Significant accounting policies (continued)

4.9.3 Derivative financial instruments

Derivative financial instruments are initially recognised at fair value on the date which a derivative contract is entered into and subsequently remeasured at fair value. Any gains or losses arising from changes in fair value of derivatives that do not qualify for hedge accounting are recognised in profit or loss.

Fair values are obtained from quoted market prices in active markets, including recent market transactions, to the extent publicly available, and valuation techniques, including discounted cash flow models and options pricing models as appropriate. All derivatives are carried as assets when fair value is positive and as liabilities when fair value is negative.

4.10 Expected Credit Loss

As of 31 December 2020, the Group recognizes a loss allowance for expected credit losses on financial assets and loans measured at amortized cost and fair value through other comprehensive income and loan commitments not measured at fair value through profit/loss based and non-cash loans on IFRS 9.

At each reporting date, the Group shall assess whether the credit risk on a financial instrument has increased significantly since initial recognition. The Parent Bank considers the changes in the default risk of financial instrument, when making the assessment.

The expected credit loss estimates are required to be unbiased, probability-weighted and include supportable information about past events, current conditions, and forecasts of future economic conditions. These financial assets are divided into three categories depending on increase in credit risk observed since their initial recognition:

Stage 1:

For the financial assets at initial recognition or that do not have a significant increase in credit risk since initial recognition. Impairment for credit risk is recorded in the amount of expected credit losses on the 12-month default risk. It is calculated 12-month expected credit loss based on a probability of default realized within 12 months after the reporting date. Such expected 12-month probability of default is applied on an expected exposure at default, multiplied with loss given default rate and discounted with the original effective interest rate. Such calculation is performed for each of three scenarios explained above.

Stage 2:

As of the reporting date of the financial asset, in the event of a significant increase in credit risk since initial recognition, the financial asset is transferred to Stage 2. Impairment for credit risk is determined on the basis of the instrument's lifetime expected credit losses. Calculation approach is quite similar with approach mentioned above, but probability of default and loss amount in default ratios estimated for the lifetime of instruments.

Stage 3:
Financial assets considered as impaired at the reporting date are classified as stage 3. The probability of default is taken into account as 100% in the calculation of impairment provision and the Group accounts lifetime expected credit losses. In determining the impairment, the Parent Bank takes into consideration the following criteria:

- Delay of over 90 days
- Do not carry the necessary conditions for Stage 1 and Stage 2

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4. Significant accounting policies (continued)

4.10 Expected Credit Loss (continued)

Calculation of expected credit losses

The Parent Bank measured expected credit losses with the reasonable, objective and supportable information based on a probability-weighted including estimations about time value of money, past events, current conditions and future economic conditions as of the reporting date, without undue cost or effort. The calculation of expected credit losses consists of three main parameters: probability of default (PD), loss given default (LGD) and exposure at default (EAD).

As of 1 January 2018, the Parent Bank has started to apply IFRS 9 for the classification of loans and receivables, measuring credit quality and calculating expected loss provisions. The Parent Bank calculates PDs, LGD and EAD (Exposure at default) and ECL (expected credit losses) for each financial asset, rather than group or portfolio basis. PDs are determined by the parent bank based on internal rating scores calculated within own model. The Parent Bank's policy is to use standard PDs published based on historical data published by international rating agencies. PDs are available for the next ten years as annual and cumulative basis. Annual periods are calculated by interpolating. For noncash loans, prior to calculating EAD, cash equivalent risk exposures are calculated by a credit conversion factor (CCF). Credit Conversion Factors are determined based on the ratios specified in the "Capital Adequacy Regulation" settled by BRSA. The present value of the ECLs are then calculated using the effective interest rates of the related financial assets.

The Parent bank calculated the average PD and LGD as 0,04% and 45%, respectively for cash financial assets, 0,29% and 45% for noncash loans as of 31 December 2020. 100% PD is applied for all financial assets in stage 3.

Probability of Default ("PD")

The PD represents the likelihood of a default over a specified time period. A 12-month PD represents the likelihood of default determined for the next 12 months and a lifetime PD represents the probability of default over the remaining lifetime of the instrument. The lifetime PD calculation is based on a series of 12-month PIT PDs that are derived from TTC PDs and scenario forecasts. In the modeling, different probability of default are used for products which have country risk.

In order to measure risk, internal rating systems, credit ratings issued by external rating agencies, payment performance of customers, and risk center credit notes for commercial customers are used to a certain extent.

Historical datas which are issued by international rating agencies are considered in order to calculate probability of default for customers and countries. The probabilities of default are cumulative in the next ten years and are calculated in the annual periods based on the estimation method.

In addition, the probability of default calculation includes historical data, current conditions and prospective macroeconomic they are updated considering expectations.

Loss Given Default ("LGD")

The LGD represents an estimate of the economic loss at the time of a potential default occurring during the life of a financial instrument. The LGD is calculated taking into account expected future cash flows from collateral and other credit enhancements by considering time value of money.

LGD calculation are also considered collaterals based on specified rate according to 'Determining the Qualifications of Loans and Other Receivables by Banks Regulation on Procedures and Principles for Provisions'

4. Significant accounting policies (continued)

4.10 Expected Credit Loss (continued)

Exposure at Default ("EAD")

The EAD represents an estimate of the exposure to credit risk at the time of a potential default occurring during the life of a financial instrument. It represents the cash flows outstanding at the time of default, considering expected repayments, interest payments and accruals, discounted at the effective interest rate.

Consideration of the Macroeconomic Factors

The probability of default is determined by basic macroeconomic factors such as unemployment, GDP growth, inflation and interest rates. Also, Turkey's 5-year credit risk (CDS Spreads) that has high correlation are based in order to update to "PD". While updating "PD", average amount for a year and the end of period value are considered for CDS Spreads.

Consideration of the Macroeconomic Factors

Since the final process of the coronavirus outbreak is currently uncertain, its impact on the Bank can be reasonably unpredictable. However, the Bank has revised its macroeconomic expectations in the expected credit loss calculation for possible effects and In the light of these data, the calculation made by considering PD and LGD is reflected in the financial statements as of December 31, 2020.

This approach, which is preferred in reserve calculations for the first quarter of 2020, will be revised in the following reporting periods, taking into account the impact of the pandemic, portfolio and future expectations.

The probability of default is determined by basic macroeconomic factors such as unemployment, GDP growth, inflation and interest rates. Also, Turkey's 5-year credit risk (CDS Spreads) that has high correlation are based in order to update to "PD". While updating "PD", average amount for a year and the end of period value are considered for CDS Spreads.

Calculating the Expected Loss Period

Lifetime ECL is calculated by taking into account maturity extensions, repayment options and the period during which the Parent Bank will be exposed to credit risk. The time in financial guarantees and other irrevocable commitments represents the credit maturity for which the liabilities of the Parent Bank. Estimated periods for the parent bank's exposure to risk were calculated by considering at historical data for full guarantee letters.

4. Significant accounting policies (continued)

4.10 Expected Credit Loss (continued)

Significant increase in credit risk

The Parent Bank makes qualitative and quantitative assessments regarding assessment of significant increase in credit risk of financial assets to be classified as stage 2 (Significant Increase in Credit Risk).
Within the scope of quantitative assessment, The quantitative reason explaining the significant increase in the credit risk is based on a comparison of the probability of default calculated at the origination of the loan and the probability of default assigned for the same loan as of the reporting date. If there is a significant deterioration in PD, it is considered that there is a significant increase in credit risk and the financial asset is classified as stage 2. In this context, the Parent Bank has calculated thresholds at which point the relative change is a significant deterioration.

When determining the significant increase in parent bank credit risk, The Parent Bank also assessed the absolute change in the PD date on the transaction date and on the reporting date. If the absolute change in the PD ratio is above the threshold values, the related financial asset is classified as stage 2.
The Parent Bank classifies the financial asset as Stage 2 (Significant Increase in Credit Risk) where any of the following conditions are satisfied as a result of a qualitative assessment:

- Loans overdue more than 30 days as of the reporting date
- When there is a change in the payment plan due to restructuring

4.11 Derecognition, reclassification and refinancing of financial instrument

Derecognition of financial assets due to change in contractual terms

Based on IFRS 9, the renegotiation or modification of the contractual cash flows of a financial asset could lead to the derecognition of the existing financial asset. When the modification of a financial asset results in the derecognition of the existing financial asset and the subsequent recognition of the modified financial asset, the modified asset is considered a 'new' financial asset. When the Parent Bank assesses the characteristics of the new contractual terms of the financial asset, it evaluates the contractual cash flows including foreign currency rate changes, conversion to equity, counterparty changes and solely principal and interest on principle. When the contractual cash flows of a financial asset are renegotiated or otherwise modified and the renegotiation or modification does not result in the derecognition of that financial asset, it is recalculated the gross carrying amount of the financial asset and recognized a modification gain or loss in profit or loss.

Where all risks and rewards of ownership of the asset have not been transferred to another party and the Parent Bank retains control of the asset, the Parent Bank continues to recognize the remaining portion of the asset and liabilities arising from such asset. When the Parent Bank retains substantially all the risks and rewards of ownership of the transferred asset, the transferred asset continues to be recognized in its entirety and the consideration received is recognized as a liability.

Derecognition of financial assets without any change in contractual terms

The Parent Bank derecognizes the asset if the contractual rights to cash flows from the financial asset are expired or the related financial asset and all risks and rewards of ownership of the asset are transferred to another party. Except for equity instruments measured at fair value through other comprehensive income, the total amount consisting of the gain or loss arising from the difference between the book value and the amount obtained and any accumulated gain directly accounted in equity shall be recognized in profit/loss.

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4. Significant accounting policies (continued)

4.11 Derecognition, reclassification and refinancing of financial instrument (continued)

Derecognition of financial liabilities

It shall be removed a financial liability (or a part of a financial liability) from the statement of financial position when, and only when, it is extinguishen when the obligation specified in the contract is discharged or cancelled or expires.

Reclassification of financial instruments

Based on IFRS 9, it shall be reclassified all affected financial assets at amortised cost to financial assets measured at fair value through other comprehensive income and fair value through profit or loss in the subsequent accounting when, it is changed the business model for managing financial assets.

Restructuring and refinancing of financial instruments

It may be changed the original contractual terms of a loan (maturity, repayment structure, guarantees and sureties) which were previously signed, in case the loan cannot be repaid or if a potential payment difficulty is encountered based on the new financing power and structure of the borrower.

Restructuring is to change the financial terms of existing loans in order to facilitate the payment of debt. Refinancing is granting a new loan which will cover either the principal or the interest payment in a whole or in part of one or a few existing loans due to the anticipated financial difficulty which the customer or group encounter currently or will encounter in the future.

Changes in the original terms of a credit risk can be made in the current contract or through a new contract.

Corporate and commercial companies which have been restructured and refinanced can be removed from the watchlist when the following conditions are met:

- Subsequent to the thorough review of company's financial data and its owners' equity position, at circumstances when it is not anticipated that the owner of the company will face financial difficulties; and it is assessed that the restructured debt will be paid on time (starting from the date when the debt is restructured all due principal and interest payments are made on time)

- At least 2 years should pass over the date restructuring (or if it is later), the date of removal from non-performing loan category, at least 10% (or the ratio specified in the legislation) of the total principal amount at the time restructuring/refinancing shall be paid and no overdue amount (principal and interest) shall remain at the date of restructuring/refinancing.

In order for the restructured non-performing corporate and commercial loans to be classified to the watchlist category, the following conditions are met:

- Recovery in debt service,
- At least 1 year should pass over the date of restructuring,
- Payment of all accrued and overdue amounts by debtor (interest and principal) since the date of restructuring/refinancing or the date when the debtor is classified as non-performing (earlier date to be considered) and fulfilment or the payment condition of all overdue amounts as of the date of restructuring/refinancing.
- Collection of all overdue amounts, disappearance of the reasons for classification as non-performing receivable (based on the conditions mentioned above) and having no overdue more than 30 days os of the date of reclassification.

4. Significant accounting policies (continued)

4.11 Derecognition, reclassification and refinancing of financial instrument (continued)

During the follow-up period of at least two years following the date of restructuring/refinancing, if there is a new structuring/refinancing or a delay of more than 30 days, the transactions which were non-performing at the beginning of the follow-up period are classified as non-performing loans again. The performing or non-performing retail loans being subject to restructuring shall be removed from the watchlist only if the debt is paid in full.

4.12 Property and equipment

Property and equipment are carried at cost less accumulated depreciation and any accumulated impairment losses.

Depreciation is charged so as to write off the cost or valuation of assets, over their estimated useful lives, using the straight-line method. The estimated useful lives, residual values and depreciation method are reviewed at each year end, with the effect of any changes in estimate accounted for on a prospective basis.

Assets held under finance leases are depreciated over their expected useful lives on the same basis as owned assets. However, when there is no reasonable certainty that ownership will be obtained by the end of the lease term, assets are depreciated over the shorter of the lease term and their useful lives.

The gain or loss arising on the disposal or retirement of an item of property, plant and equipment is determined as the difference between the sales proceeds and the carrying amount of the asset and is recognized in profit or loss.

4.13 Intangible assets

Intangible assets acquired separately are reported at cost less accumulated amortization and accumulated impairment losses. Amortization is charged on a straight-line basis over their estimated useful lives. The estimated useful life and amortization method are reviewed at the end of each annual reporting period, with the effect of any changes in estimate being accounted for on a prospective basis.

Computer software

Acquired computer software licenses are capitalized on the basis of the costs incurred to acquire and bring to use the specific software. These costs are amortized over their estimated useful lives (three to five years).

Costs associated with developing or maintaining computer software programmes are recognized as an expense as incurred. Costs that are directly associated with the development of identifiable and unique software products controlled by the Group, and that will probably generate economic benefits exceeding costs beyond one year, are recognized as intangible assets. Costs include the software development employee costs and an appropriate portion of relevant overheads.

4.14 Investment properties

Investment properties are properties held to earn rentals and/or for capital appreciation, including property under construction for such purposes. Investment properties are measured initially at cost, including transaction costs. Subsequent to initial recognition, investment properties are stated at fair value.

The Group's investment properties are valued by external, independent valuation companies on a periodic basis. The fair values are based on market values, being the estimated amount for which a property could be exchanged on the date of the valuation between a willing buyer and a willing seller in an arm's length transaction. In the absence of available current prices in an active market, the valuations are based on estimated cash flows expected to be received.

4. Significant accounting policies (continued)

4.14 Investment properties (continued)

Gains or losses arising from changes in the fair values of investment properties are included in the profit or loss in the period in which they arise. When the use of a property changes such that it is reclassified as property, plant and equipment, its fair value at the date of reclassification becomes its cost for subsequent accounting. If owner occupied property becomes an investment property, the Group accounts for such property in accordance with the policy stated under property, plant and equipment up to the date of change in use. An investment property is derecognized upon disposal or when the investment property is permanently withdrawn from use and no future economic benefits are expected from disposal. Any gain or loss arising on derecognition of the property (calculated as the difference between the net disposal proceeds and the carrying amount of the asset) is included in profit or loss in the period in which the property is derecognized.

4.15 Leases

Leases are classified as finance leases whenever the terms of the lease transfer substantially all the risks and rewards of ownership to the lessee. All other leases are classified as operating leases.

The Group as lessee

Assets held under finance leases are initially recognized as assets of the Group at their fair value at the inception of the lease or, if lower, at the present value of the minimum lease payments. The corresponding liability to the lessor is included in the statement of financial position as a finance lease obligation.

Lease payments are apportioned between finance expenses and reduction of the lease obligation so as to achieve a constant rate of interest on the remaining balance of the liability. Finance expenses are recognized immediately in profit or loss, unless they are directly attributable to qualifying assets.

TFRS 16 standard removes the dual accounting model in the form of showing the balance sheet results of financial leasing transactions and operational leasing transactions. Instead of this, a singular accounting model based on balance sheet is introduced, similar to the existing financial leasing accounting. for leasers, accounting process have been an important feature, similar to existing practices. The Group has started to apply TFRS 16 Leases standard as of January 1, 2019. As of 31 December 2020, The Group recognized right of use asset classified under tangible assets and lease liability amounting to TL 6,785 and TL 6,996 respectively due to application of IFRS 16.

The Group as lessor

Amounts due from lessees under finance leases are recognized as receivables at the amount of the Group's net investment in the leases. Finance lease income is allocated to accounting periods so as to reflect a constant periodic rate of return on the Group's net investment outstanding in respect of the leases. Rental income from operating leases is recognized on a straight-line basis over the term of the relevant lease. Initial direct costs incurred in negotiating and arranging an operating lease are added to the carrying amount of the leased asset and recognized on a straight-line basis over the lease term.

4. Significant accounting policies (continued)

4.16 Provisions

Provisions are recognized when the Group has a present obligation as a result of a past event, and it is probable that the Group will be required to settle that obligation, and a reliable estimate can be made of the amount of the obligation.

The amount recognized as a provision is the best estimate of the consideration required to settle the present obligation at the balance sheet date, taking into account the risks and uncertainties surrounding the obligation. Where a provision is measured using the cash flows estimated to settle the present obligation, its carrying amount is the present value of those cash flows. When some or all of the economic benefits required to settle a provision are expected to be recovered from a third party, the receivable is recognized as an asset if it is virtually certain that reimbursement will be received and the amount of the receivable can be measured reliably.

4.17 Employee benefits

Termination and retirement benefits

Under Turkish law and union agreements, lump sum payments are made to employees retiring or involuntarily leaving the Group. Such payments are considered as being part of defined retirement benefit plan as per International Accounting Standard No. 19 (revised) “Employee Benefits” (“IAS 19”). The retirement benefit obligation recognized in the balance sheet represents the present value of the defined benefit obligation.

Profit-sharing and bonus plans

The Group recognizes a provision where contractually obliged or where there is a past practice that has created a constructive obligation.

4.18 Fiduciary assets

Assets held by the Group in a fiduciary, agency or custodian capacity for its customers are not included in the balance sheet, since such items are not treated as assets of the Group.

4.19 Use of estimates and judgments

The preparation of the consolidated financial statements requires management to make judgements, estimates and assumptions that affect the application of accounting policies and the reported amounts of assets, liabilities, income and expenses. Actual results may differ from these estimates. Estimates and underlying assumptions are reviewed on an ongoing basis. Revisions to accounting estimates are recognised in the period in which the estimate is revised and in any future periods affected.

4.20 Key sources of estimation uncertainty

Expected credit loss

Expected credit loss calculation methodology of the Group described in accounting policy 4.10.

Determining fair values

The determination of fair value for financial assets and liabilities of the Group described in accounting policy 4.9.

5. Segment reporting

An operating segment is a component of an entity: that engages in business activities from which it may earn revenues and incur expenses (including revenues and expenses relating to transactions with other components of the same entity), whose operating results are regularly reviewed by the entity's chief operating decision maker to make decisions about resources to be allocated to the segment and assess its performance, and for which discrete financial information is available.

The Group operates in investment, retail and corporate banking and asset leasing. Accordingly, the Group invests with the funds provided by using the capital market instruments and provides consultancy services so as to provide efficient management and sound financial structure to business enterprises.

The Group provides investment and operating loans to its commercial and retail customers and also provides service packages consisting of foreign trade operations, investment products, cash management, financial leasing, factoring, and other banking products.

Major financial statement items according to business lines:

31 December 2020	Corporate Banking	Other(*)	Total operations of the Group
Operating income	220,584	64,652	285,236
Other expenses	(155,116)	-	(155,116)
Profit before income tax	65,468	64,652	130,120
Income tax income/expense			(21,217)
Profit from continued operations	65,468	64,652	108,903
Profit for the period	**44,251**	**64,652**	**108,903**
Segment assets	4,325,309	35	4,325,344
Non-distributed Asset	-	-	-
Total assets	**4,325,309**	**35**	**4,325,344**
Segment liabilities	3,706,354	0	3,706,354
Shareholders' equity	0	618,990	618,990
Total liabilities	**3,706,354**	**618,990**	**4,325,344**

(*) includes investment, retail and other banking business lines.

31 December 2019	Corporate Banking	Other(*)	Total operations of the Group
Operating income	195,618	1,192	196,810
Other expenses	(109,605)	-	(109,605)
Profit before income tax	86,013	1,192	87,205
Income tax income/expense	-	-	(18,693)
Profit from continued operations	-	-	-
Profit for the period	**67,320**	**1,192**	**68,512**
Segment assets	3,249,928	4,022	3,253,950
Non-distributed Asset	-	-	-
Total assets	**3,249,928**	**4,022**	**3,253,950**
Segment liabilities	2,817,608	-	2,817,608
Shareholders' equity	-	436,342	436,342
Total liabilities	**2,817,608**	**436,342**	**3,253,950**

(*) includes investment, retail and other banking business lines.

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6. Cash and cash equivalents

	31 December 2020	31 December 2019
Cash and balances with central banks	1,263	1,286
- Cash on hand	*1,259*	*1,283*
- Balances with central banks	*4*	*3*
Due from banks and financial institutions(*)	388,964	472,359
Cash and cash equivalents in the balance sheet	**390,227**	**473,645**

(*) Amount of TL 97 provision booked for due from banks and financial institutions as of December 31, 2020 (December 31, 2019: 101).

Expected credit loss for banks and reserve deposits at central bank

	Stage 1	Stage 2	Stage 3	Total
Balances at Beginning of Period (1 January 2018)	**101**	-	-	**101**
Additions During the Period (+)	-	-	-	-
Disposal (-)	(4)	-	-	(4)
Balances at End of Period	**97**	-	-	**97**

7. Reserve deposits at Central Bank

	31 December 2020	31 December 2019
Turkish Lira	6,418	20,186
Foreign currency	122,414	129,497
	128,832	**149,683**

8. Financial assets measured at fair value through other comprehensive income

	31 December 2019		31 December 2019	
	Amount	Effective interest rate	Amount	Effective interest rate
Financial assets measured at fair value through other comprehensive income				
Debt instruments (a)	112,115	19.34%	67,205	13.91%
Equity instruments – listed (b)	203,608		122,671	
Equity instruments – unlisted	6,414		9,176	
Financial assets measured at fair value through other comprehensive income	**322,137**		**199,052**	
Expected Credit Losses (-)(c)	**(184)**		**(696)**	
Total FVTOCI	**321,953**		**198,356**	

(a) Financial assets measured at fair value through other comprehensive income include government bonds denominated in TL amounting to TL 7,237 (31 December 2019: TL 477), bank bonds amounting to TL 6,137 (31 December 2019: TL 6,134), private sector securities amounting to 4,343 TL (31 December 2019: TL 3,866), Private sector bonds amounting to TL 94,213 (31 December 2019: TL 56,032).

(b) The Group holds 9,43% of Nurol Gayrimenkul Yatırım Ortaklığı A.Ş. ("Company")'s shares as of 31 December 2020 and the investment is accounted under fair value through other comprehensive income investments, as the Group has no significant influence on the Company, As of the balance sheet date the shares are accounted for using the market price and fair value reserve of TL 120,699 is accounted under equity (31 December 2019: TL 40,304).

(c) The Group calculates expected credit loss for financial assets measured at fair value through other comprehensive income in accordance with IFRS 9. As of 31 December 2020, the expected credit loss that is calculated for financial assets measured at fair value through other comprehensive income is TL 184 (December 31, 2019: 124).

Expected credit loss for financial assets measured at amortised cost

	Stage 1	Stage 2	Stage 3	Total
Balances at Beginning of Period (1 January 2020	**124**	**-**	**-**	**124**
Additions During the Period (+)	104	-	-	104
Disposal (-)	(44)	-	-	(44)
Balances at End of Period	**184**	**-**	**-**	**184**

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9. Loans and advances to customers

	31 December 2020		
	Amount		
	TL	Foreign currency	Total
Short-term loans	1,451,084	813,337	2,264,421
Medium and long-term loans	384,307	455,157	839,464
Total performing loans	**1,835,391**	**1,268,494**	**3,103,885**
Generic provisions for Stage 1 and Stage 2	**(25,550)**	**-**	**(25,550)**
Non-performing loans (*)	86,220	-	86,220
Provisions for Stage 3 (*)	(72,526)	-	(72,526)
Total non-performing loans (net)	**13,694**	**-**	**13,694**
Total loans, net	**1,823,535**	**1,268,494**	**3,092,029**

	31 December 2019		
	Amount		
	TL	Foreign currency	Total
Short-term loans	1,105,257	328,073	1,433,330
Medium and long-term loans	187,411	413,004	600,415
Total performing loans	**1,292,668**	**741,077**	**2,033,745**
Generic provisions for Stage 1 and Stage 2	**(8,730)**	**-**	**(8,730)**
Non-performing loans (*)	161,610	-	161,610
Provisions for Stage 3 (*)	(27,419)	-	(27,419)
Total non-performing loans (net)	**134,191**	**-**	**134,191**
Total loans, net	**1,418,129**	**741,077**	**2,159,206**

Loans and advances to customers

	31 December 2020	31 December 2019
Corporate Lending	2,920,236	1,721,502
SME Lending	74,054	55,113
Other Lending	195,815	418,740
Less: Allowance for ECL/impairment losses	(98,076)	(36,149)
Total	**3,092,029**	**2,159,206**

(Currency - In thousands of Turkish Lira)

9. Loans and advances to customers (continued)

	31 December 2020				31 December 2019			
	ECL allowance				ECL Allowance			
	Stage 1	Stage 2	Stage 3	Total	Stage 1	Stage 2	Stage 3	Total
Cash and cash equivalents (including								
reserves at Central Bank)	(4)	-	-	(4)	96	-	-	96
Securities	70	-	-	70	15	-	-	15
Derivatives	-	-	-	-	-	-	-	-
Loans and advances to customers	886	15,924	45,107	61,917	(1,326)	923	25,055	24,652
Other financial assets	30	-	-	30	28	-	-	28
Guarantees	446	220	3,250	3,916	232	(303)	(676)	(747)
LCs and Acceptances	(3)	-	-	(3)	(15)	-	-	(15)
	1,425	**16,144**	**48,357**	**65,914**	**(970)**	**620**	**24,379**	**24,029**

Expected Credit Loss Measurement of On-Balance Sheet Financial Assets:

	31 December 2020							
	Carrying Amount				ECL Allowance			
	Stage 1	Stage 2	Stage 3	Total	Stage 1	Stage 2	Stage 3	Total
Cash and cash equivalents								
(including reserves at Central Bank)	519,059	-	-	6	97	-	-	97
Securities	321,953	-	-	519,059	184	-	-	184
Derivatives	39,179	-	-	321,953	-	-	-	-
Loans and advances to customers	2,997,374	106,511	86,220	39,179	1,518	24,032	72,526	98,076
of which : Large corporate clients	*2,727,505*	*106,511*	*86,220*	*3,190,105*	*1,463*	*24,032*	*72,526*	*98,021*
of which : SME clients	*74,054*	-	-	*2,920,236*	*13*	-	-	*13*
of which : Others	*195,815*	-	-	*74,054*	*42*	-	-	*42*
Other financial assets	6,176	-	-	195,815	92	-	-	92
Total on-balance sheet financial				6,176				
assets in scope of ECL requirements	**3,883,741**	**106,511**	**86,220**	**4,076,472**	**1,891**	**24,032**	**72,526**	**98,448**

	31 December 2019							
	Carrying Amount				ECL Allowance			
	Stage 1	Stage 2	Stage 3	Total	Stage 1	Stage 2	Stage 3	Total
Cash and cash equivalents								
(including reserves at Central Bank)	623,328	-	-	623,328	101	-	-	101
Securities	198,356	-	-	198,356	114	-	-	114
Derivatives	11,937	-	-	11,937	-	-	-	-
Loans and advances to customers	1,880,130	153,613	161,610	2,195,355	632	8,108	27,419	36,159
of which : Large corporate clients	*1,406,279*	*153,613*	*161,610*	*1,721,502*	*553*	*8,108*	*27,419*	*36,080*
of which : SME clients	*55,113*	-	-	*55,113*	*5*	-	-	*5*
of which : Others	*418,738*	-	-	*418,738*	*74*	-	-	*74*
Other financial assets	4,263	-	-	4,263	62	-	-	62
Total on-balance sheet financial								
assets in scope of ECL requirements	**2,718,014**	**153,613**	**161,610**	**3,033,237**	**909**	**8,108**	**27,419**	**36,436**

9. Loans and advances to customers (continued)

Impairment allowance for loans and advances to customers	31 December 2020 Stage 1	Stage 2	Stage 3	Total
Internal rating grade				
Performing				
High grade	242	-	-	242
Standard grade	389	-	-	389
Sub-standard grade	887	24,032	-	24,919
Past due but not impaired	-	-	-	-
Non-performing				-
Individually impaired	-	-	72,526	72,526
	1,518	**24,032**	**72,526**	**98,076**

Impairment allowance for loans and advances to customers	31 December 2019 Stage 1	Stage 2	Stage 3	Total
Internal rating grade				
Performing				
High grade	131	-	-	131
Standard grade	209	-	-	209
Sub-standard grade	282	8,108	-	8,390
Past due but not impaired	-	-	-	-
Non-performing				
Individually impaired	-	-	27,419	27,419
	622	**8,108**	**27,419**	**36,159**

Aging of past-due exposures	31 December 2020 Up to 3 Month	1-3 Months	3-12 Months	1-5 Years	5 Years and other
Current Period					
Corporate and Commercial Loans	1,214	0	-	-	-
Retail Loans	-	-	-	-	-
Others	-	-	-	-	-
	1,214	**0**	-	-	-

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10. Investment Property

As of 30 November 2015, the Parent Bank transferred the loan which is classified in the portfolio of The Pre-emption agreement on the real estate properties registered to the Serik District of Antalya Province which is owned by the Parent Bank account in “Other Assets” has not been realized due to the counterparty Vera Varlık Yönetim A.Ş. is not fullfulling the obligations and the legal process is ongoing aforementioned real estate properties have been removed from “Other Assets” and recognized to “Investment Properties” in TL Currency and reevaluated with and independent valuation report (appraisement value: TL 135,245). Similarly, the Right to repurchase agreement on the real estate properties registered to which is owned by the Parent Bank account in “Other Assets” has not been realized due to the counterparty Palmali International is not fullfulling the obligations and the legal process is ongoing aforementioned real estate properties have been removed from “Other Assets” and recognized to “Investment Properties” in TL Currency and reevaluated with and independent valuation report (appraisement value: TL 39,940). In the first quarter of 2020, Ressulla Turizm San.ve Tic. A.Ş., the real estates amounting to TL 82,440, which were purchased and deducted from receivables, have been accounted in the “Investment Properties” account.

Also, other investment properties accounted amounting to TL 38,875 in the account. As of 31 December 2020, the Group has investment property amounting to TL 296,500 (31 December 2019: 223,545).

11. Property and equipment

	Office equipment	Furniture and fixfures	Other fixed assets	Total
Cost				
Balance at 1 January 2020	4,616	718	8,987	14,321
Acquisitions	2,457	318	6,350	9,125
Disposals	-	-	-	-
Balance at 31 December 2020	**7,073**	**1,036**	**15,337**	**23,446**
Depreciation				
Balance at 1 January 2020	3,113	406	3,671	7,190
Depreciation charge for the period	1,056	149	1,208	2,413
Disposals	-	-	-	-
Balance af 31 December 2020	**4,169**	**555**	**4,879**	**9,603**
Carrying value as of 31 Decemher 2020	**2,904**	**481**	**10,458**	**13,843**

	Office equipment	Furniture and fixfures	Other fixed assets	Total
Cost				
Balance at 1 January 2019	4,146	711	3,143	8,000
Acquisitions	470	7	5,844	6,321
Disposals	-	-	-	-
Balance at 31 December 2019	**4,616**	**718**	**8,987**	**14,321**
Depreciation				
Balance at 1 January 2019	2,474	275	1,211	3,960
Depreciation charge for the period	639	131	2,460	3,230
Disposals	-	-	-	-
Balance af 31 December 2019	**3,113**	**406**	**3,671**	**7,190**
Carrying value as of 31 Decemher 2019	**1,503**	**312**	**5,316**	**7,131**

(*) TFRS 16 opening balances (2,861 TL Real Estate and 1,936 TL Vehicles) are shown in the cost line.

12. Intangible assets

	2020	Total
Cost		
Balance at 1 January 2019	11.197	11.197
Additions	6.588	6.588
Balance at 31 December 2019	**17.785**	**17.785**
Amortization and impairment		
Balance at 1 January 2019	6,386	6,386
Amortization change for the period	2,805	2,805
Balance at 31 December 2019	**9,191**	**9,191**
Carrying valus as of 31 December 2019	**8,594**	**8,594**

	2019	Total
Cost		
Balance at 1 January 2019	6,850	6,850
Additions	4,347	4,347
Balance at 31 December 2019	**11,197**	**11,197**
Amortization and impairment		
Balance at 1 January 2019	4,661	4,661
Amortization change for the period	1,725	1,725
Balance at 31 December 2019	**6,386**	**6,386**
Carrying valus as of 31 December 2019	**4,811**	**4,811**

13. Funds borrowed

	31 December 2020			31 December 2019		
	TL	Foreign currency	Total	TL	Foreign currency	Total
Funds borrowed	365,170	682,614	1,047,784	409,922	463,010	872,932
Obligations under repurchase agreements	2,203	70,111	72,314	3,538	28,169	31,707
	367,373	**752,725**	**1,120,098**	**413,460**	**491,179**	**904,639**

The effective interest rate for funds borrowed denominated in USD is 2.58% (31 December 2019 –4.73%), in EUR is 2.06% (31 December 2019 – 1,75%) and in TL is 16.45% (31 December 2019 – 10.70%).

The Group has not had any defaults of principal, interest or redemption amounts or other breaches of loan covenants as at 31 December 2020 (31 December 2019 – None).

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14. Debt securities issued

	31 December 2020			31 December 2019		
	TL	Foreign currency	Total	TL	Foreign currency	Total
Bonds	571,405	-	571,405	717,235	-	717,235
Bills	151,385	-	151,385	46,033	-	46,033
	722,790	**-**	**722,790**	**763,268**	**-**	**763,268**

Debt securities issued

	31 December 2020
Balance as at 1 January 2020	763,268
Proceed during the year	5,743,974
Repayments during the year	(5,744,146)
Other non-cash movements	(40,306)
Balance as at 31 December 2020	**722,790**

As of December 31, 2020, the list of the issued bills and bonds by the Parent Bank are shown below:

ISSUE TYPE	ISSUE DATE	MATURITY DATE	DAYS	NOMINAL VALUE (full TL)	INTEREST RATE
BOND	27.05.2020	26.05.2022	364	50,000,000	%9.00
BILL	01.06.2020	01.06.2022	730	50,000,000	%9.00
BILL	25.06.2020	27.06.2022	732	50,000,000	% 9.25
BILL	11.09.2020	13.09.2022	732	50,000,000	% 14.00
BOND	16.09.2020	13.01.2021	119	50,000,000	% 14.00
BOND	25.09.2020	28.01.2021	125	50,000,000	% 14.25
BOND	06.11.2020	05.02.2021	91	50,000,000	% 15.75
BOND	18.11.2020	23.02.2021	97	100,000,000	% 16.50
BILL	26.11.2020	28.11.2022	732	50,000,000	% 15.75
BOND	03.12.2020	04.03.2021	91	50,000,000	% 17.00
BOND	16.12.2020	31.03.2021	105	70,000,000	% 17.50
BOND	24.12.2020	08.04.2021	105	100,000,000	% 18.00
BOND	11.12.2020	13.05.2021	153	100,000,000	% 18.40
BOND	21.12.2020	22.03.2021	91	50,000,000	% 17.50

Nurol Varlık Kiralama Şirketi A.Ş. issued “Lease certificates” amounting to TL 150,000,000 (full TL) first quarter in 2020.

(Currency - In thousands of Turkish Lira)

15. Subordinated debts

	31 December 2020			31 December 2019		
	TL	Foreign currency	Total	TL	Foreign currency	Total
Bonds	-	37,158	37,158	-	29,761	29,761
Bills	-	76,056	76056	-	60,544	60,544
	-	**113,214**	**113,214**	-	**90,305**	**90,305**

(*) The Parent Bank has issued Eurobond on December 31, 2016 with a nominal value of USD 10,000,000, 10 years maturity and fixed interest rate of 10%, having a coupon payments every six months and received a loan on December 27, 2016 from World Business Capital at an amount of USD 5,000,000 with an interest rate of 6.65%, 10 years maturity, floating rate and quarterly interest payment (31 December 2019 – USD 15,000,000).

16. Other liabilities

	31 December 2020	31 December 2019
Cash collaterals (*)	1,598,528	963,645
Taxes and funds payable	9,330	7,461
Lease Liabilities	6,996	3,167
Others	21,044	13,499
	1,635,898	**987,772**

(*) The balance includes cash collaterals received for the derivative transactions made with the corporate customers.

17. Provisions

	31 December 2020	31 December 2019
Provision for non-cash loans(*)	6,234	2,321
Employee termination benefits	1,644	1,445
Bonus accrual	2,622	1,779
Unused vacation accrual	-	-
Provision for lawsuits	22,010	16,807
	32,510	**22,352**

The movement in vacation pay liability is as follows:

	2020	2019
At 1 January	1,779	1,401
Provision provided /(reversal)	843	378
At 31 December	**2,622**	**1,779**

The movement in provision for employee termination benefits is as follows:

	2020	2019
At 1 January	1,445	1,064
Provision provided /(reversal)	199	381
At 31 December	**1,644**	**1,445**

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17. Provisions (continued)

Employee termination benefits

Under Turkish Labor Law, the Group is required to pay termination benefits to each employee who has completed certain years of service and whose employment is terminated without due cause, who is called up for military service, dies or retires after completing 25 years (20 years for women) of service and reaches the retirement age (58 for women and 60 for men).

The amount payable consists of one month's salary limited to a maximum of TL 7,117.17 for each period of service at 31 December 2020 (31 December 2019: TL 6,379.86).

Retirement pay liability is not subject to any kind of funding legally. Provision for retirement pay liability is calculated by estimating the present value of probable liability amount arising due to retirement of employees. IAS 19 Employee Benefits stipulates the development of company's liabilities by using actuarial valuation methods under defined benefit plans. In this direction, actuarial assumptions used in calculation of total liabilities are described as follows:

The principal assumption is that the maximum liability for each year of service will increase parallel with inflation. Thus, the discount rate applied represents the expected real rate after adjusting for the anticipated effects of future inflation. Consequently, in the accompanying consolidated financial statements as at 31 December 2020, the provision has been calculated by estimating the present value of the future probable obligation of the Company arising from the retirement of the employees. The provisions at the respective balance sheet dates have been calculated by using 13.60% (31 December 2019: 10.00%) annual inflation rate and 9,50% (31 December 2019: 15.00%) discount rate.

Expected credit loss measurement of off-balance sheet financial assets:

	31 December 2020							
	Carrying Amount				ECL Allowance(*)			
Expected credit loss measurement	Stage 1	Stage 2	Stage 3	Total	Stage 1	Stage 2	Stage 3	Total
Guarantees	857,489	12,510	4,092	874,091	1,075	1,710	3,446	6,231
LCs and Acceptances	2,425	-	-	2,425	3	-	-	3
Total	**859,914**	**12,510**	**4,092**	**876,516**	**1,078**	**1,710**	**3,446**	**6,234**

(*) ECL allowance for off-balance sheet financial assets are recognized in Liabilities' "Provisions" line.

	31 December 2019							
	Carrying Amount				ECL Allowance(*)			
Expected credit loss measurement	Stage 1	Stage 2	Stage 3	Total	Stage 1	Stage 2	Stage 3	Total
Guarantees	870,320	19,352	2,273	891,945	629	1,490	196	2,315
LCs and Acceptances	33,908	-	-	33,908	6	-	-	6
Total	**904,228**	**19,352**	**2,273**	**925,853**	**635**	**1,490**	**196**	**2,321**

(*) ECL allowance for off-balance sheet financial assets are recognized in Liabilities' "Provisions" line.

17. Provisions (continued)

Impairment allowance for off-balance sheet financial assets:

	31 December 2020			
	Stage 1	Stage 2	Stage 3	Total
Internal rating grade				
Performing				
High grade	2	-	-	2
Standard grade	704	-	-	704
Sub-standard grade	372	1,710	-	2,082
Past due but not impaired	-	-	-	-
Non-performing				-
Individually impaired	-	-	3,446	3,446
Total	**1,078**	**1,710**	**3,446**	**6,234**

Movement for impairment allowance for off-balance sheet financial assets:

	31 December 2020			
	Financial guarantees	Letters of credit and acceptances	Other undrawn commitments	Total
At 1 January 2020	**2,315**	**6**	**-**	**2,321**
Charge for the year	3,916	(3)	-	3,913
Recoveries	-	-	-	-
Amounts written off	-	-	-	-
Unwind of transformed into cash	-	-	-	-
Unwind of discount (recognized in interest income)	-	-		-
At 31 December 2020	**6,231**	**3**	**-**	**6,234**

18. Taxation

The Group is subject to taxation in accordance with the tax procedures and the legislation effective in Turkey. In Turkey, corporate tax rate is 22% (31 December 2019: 22%). The tax legislation provides for a temporary tax of 22% to be calculated and paid based on earnings generated for each quarter. The amounts which are calculated and paid are offset against the final corporate tax liability for the year.

Corporate tax losses can be carried forward for a maximum period of five years following the year in which the losses were incurred. The tax authorities can inspect tax returns and the related accounting records for a retrospective maximum period of five years. Corporate tax returns are required to be filed by the twenty-fifth day of the fourth month following the year-end balance sheet date and taxes must be paid in one instalment by the end of the fourth month.

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18. Taxation (continued)

Income tax recognised in the income statement

The components of income tax expense as stated below:

	31 December 2020	31 December 2019
Current tax		
Current income tax	26,521	25,681
Deferred income / (expense) tax		
Relating to origination and reversal of temporary differences	(5,304)	(6.988)
Income tax expense reported in the income statement	**21,217**	**18.693**

Reconciliation of effective tax rate

Reconciliation between tax expense and the accounting profit multiplied by the statutory income tax rate for the years ended 31 December 2020 and 31 December 2019 is as follows:

	31 December 2020	31 December 2019
Profit before income tax	130,120	87,205
Income tax using the domestic corporate tax rate (*)	(28,626)	(19,185)
Other	2,105	(6,496)
Total income tax expense in the profit or loss	**(26,521)**	**(25,681)**

Movement of net deferred tax assets can be presented as follows:

	31 December 2020	31 December 2019
Deferred tax assets / (liability), net at 1 January	8,741	2,032
Deferred tax recognised in the profit or loss	5,304	6,988
Deferred income tax recognised in other comprehensive income	(6,443)	(279)
Deferred tax assets/(liabilities), net at end of December		**8,741**

(Currency - In thousands of Turkish Lira)

18. Taxation (continued)

Deferred tax assets and liabilities

Deferred tax assets and liabilities are attributable to the following:

	31 December 2020			31 December 2019		
	Assets	Liabilities	Net	Assets	Liabilities	Net
Liability for employee benefits	853	-	853	709	-	709
Valuation of financial assets at FVOCI	-	5,965	5,965	-	118	118
Economic life property and equipment	-	579	579	(417)	-	(417)
Derivatives	8,533	-	8,533	6,433	-	6,433
Expected Loss Provision	5,745	-	5,745	-	-	-
Other	-	659	659	-	1,898	1,898
Provisions for realty	-	4,728	4,728			
Provisions for lawsuit	4,402	-	4,402			
	19,533	**11,931**	**7,602**	**6,725**	**2,016**	**8,741**

19. Commitments and contingencies

In the normal course of business, the Group enters into a number of contractual commitments on behalf of its customers and is a party to financial instruments with off-balance sheet risk to meet the financing needs of its customers. These contractual commitments consist of commitments to extend credit, commercial letters of credit and standby letters of credit and guarantees. Commitments to extend credit are agreements to lend to a customer as long as there is no violation of the conditions established in the contract. Commercial letters of credit ensure payment by a bank to a third party for a customer's foreign or domestic trade transactions, generally to finance a commercial contract for the shipment of goods.

Standby letters of credit and financial guarantees are conditional commitments issued by the Group to guarantee the performance of a customer to a third party. All of these arrangements are related to the normal lending activities of the Group. The Group's exposure to credit loss in the event of non-performance by the other party to the financial instrument for commitments to extend credit and commercial and standby letters of credit is represented by the contractual notional amount of those instruments. The Group uses the same credit policies in making commitments and conditional obligations as it does for on-balance-sheet instruments.

As at 31 December 2020; commitments and contingencies comprised the following:

	31 December 2020	31 December 2019
Letters of guarantee	874,091	891,944
Bank acceptance	-	-
Letters of credit	2,425	33,909
Other commitments	-	-
Total	**876,516**	**925,853**

20. Share capital and reserves

Share capital

As at 31 December 2020 and 31 December 2019, the composition of shareholders and their respective percentage of ownership are summarised as follows:

	31 December 2020		31 December 2019	
	Amount	%	Amount	%
Nurol Holding A.Ş.	284,337	78.98	236,947	78.98
Nurol İnşaat ve Tic. A.Ş.	60,134	16.70	50,112	16.70
Others	15,529	4.32	12,941	4.32
Total	**360,000**		**300,000**	

As at 31 December 2020, the authorised share capital comprised of 360,000 ordinary shares having a par value of TL full 1,000 (As at 31 December 2019, the authorised share capital comprised of 300,000 ordinary shares having a par value of TL full 1,000). All issued shares are paid.

Due to the pandemic caused by Covid-19 virus, and in accordance with the Decision of the Ministry of Trade, the 2019 Ordinary General Meeting of the Parent Bank, which is planned to be held on March 25, 2020 and at 13.30, has been postponed to June 22, 2020 and based on ordinary general meeting, the paid-up capital of the Bank was increased to 360,000 TL by covering 60,000 TL from internal resources. The capital increase of the Ordinary General Assembly, the date July 1, 2020 and numbered 10109 Turkey has been announced in the Trade Registry Gazette.

Legal Reserves

The legal reserves consist of first and second legal reserves in accordance with the Turkish Commercial Code. The first legal reserve is appropriated out of the statutory profits at the rate of 5%, until the total reserve reaches a maximum of 20% of the entity's share capital. The second legal reserve is appropriated at the rate of 10% of all distributions in excess of 5% of the entity's share capital. The first and second legal reserves are not available for distribution unless they exceed 50% of the share capital, but may be used to absorb losses in the event that the general reserve is exhausted.

As at 31 December 2020, the Group's legal reserves amounted to TL 13,051 (31 December 2019 – TL 9,969).

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20. Share capital and reserves (continued)

Fair value through other comprehensive income ("FVOCI") reserves

The fair value through other comprehensive income includes the cumulative net change in the fair value of other comprehensive income for sale investments until the investment is derecognised or impaired.

Movement in fair value through comprehensive income reserve is as follows:

At 31 December 2019	**45,028**
At 1 January 2019	45,028
Change in fair value through other comprehensive income (net of tax)	73,745
At 31 December 2020	**118,773**

21. Net interest income

	31 December 2020	31 December 2019
Interest income		
Loans and advances to customers	312,947	300,642
Deposits with banks and other financial institutions	15,982	31,984
Financial assets measured at fair value through profit/loss and financial assets measured at fair value through other comprehensive income	42,106	98,761
Financial leases	-	-
Other	31,828	28,022
	402,863	**459,409**
Interest expense		
Funds borrowed	(48,919)	74,329
Debt securities issued	(7,606)	132,668
Interbank funds borrowed	(86,579)	12,098
Financial leases	(722)	746
Other	(40,483)	30,540
	(184,309)	**250,381**
Net interest income	**218,554**	**209,028**

22. Net fee and commission income

	31 December 2020	31 December 2019
Fee and commission income		
Non-cash loans	16,541	19,967
Other	16,656	37,560
Total fee and commission income	**33,197**	**57,527**
Fee and commission expense		
Non-cash loans	(2,407)	1,911
Other	(7,114)	6,815
Total fee and commission expense	**(9,521)**	**8,726**
Net fee and commission income	**23,676**	**48,801**

23. Net trading income/loss

	31 December 2020	31 December 2019
Net gains/(losses) on derecognition of financial assets measured at fair value through other comprehensive income	76,352	(9,150)
Net gains/(losses) on financial assets/liabilities at fair value through profit or loss	(58,248)	(64,787)
Gain / (losses) from derivatives	*(43,592)*	*(44,709)*
Gain / (losses) from FX losses	*(14,656)*	*(20,078)*
Total	**18,104**	**(73,937)**

24. Other operating income

	31 December 2020	31 December 2019
Fair value gain on investment properties	20,193	4,169
Reversal of provision	3,614	311
Communication expenses reflected to the customers	114	281
Gain on sales of assets	1	20
Other	891	8,137
	24,813	**12,918**

25. Other provision expenses

	1 January - 31 December 2020	1 January - 31 December 2019
Provision of lawsuits	5,203	16,843
Bonus expenses	4,641	-
Unused vacation expenses	843	378
Other expenses	3,875	194
Total	**14,562**	**17,415**

26. Personnel expenses

	31 December 2020	31 December 2019
Wages and salaries	22,372	18,486
Compulsory social security obligations	1,919	1,513
Other benefits	1,551	5,151
Total	**25,842**	**25,150**

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27. Administrative expenses

	31 December 2020	31 December 2019
Nurol Holding re-charges	6,655	6,330
Audit and advisory expenses	5,734	9,029
Taxes and duties expenses	4,356	7,105
Rent expenses	378	202
Telecommunication expenses	2,613	1,947
Expenses made for non performing loans	2,040	-
Computer expenses	927	1,182
Maintenance expenses	734	339
Marketing expenses	-	1,534
Notary expenses	183	154
Advertising expenses	94	76
Transportation expenses	-	381
Other various administrative expenses	17,727	9,777
Total	**41,441**	**38,056**

28. Financial risk management objectives and policies

a) Introduction and overview

The Group has exposure to the following risks from financial instruments:
- credit risk
- market risks
- liquidity risks
- operational risks

This note presents information about the Group's exposure to each of the above risks, the Group's objectives, policies and processes for measuring and managing risk, and the Bank's management of capital.

Risk management framework

The Group's risk approach is to achieve sound and sustainable low risk profile, through the identification, the measurement and the monitoring of all types of risks inherent in the nature of the business activities. The main principle of the Group is to manage the credit risk effectively and to eliminate the other types of risk by not carrying positions.

In the course of its normal operations, the Group is exposed to a number of risks such as credit risk, liquidity risk, market risk and operational risk, The Group's risk policy can be summarised as:

- well managing the credit risk through a high standardised credit risk management
- eliminating liquidity risk
- minimising market risk

28. Financial risk management objectives and policies (continued)

In accordance with the Group's general risk management strategy; the Group aims to eliminate and hedge its currency, interest rate and maturity positions that might create liquidity or market risk to the Group. Additionally, in order to minimise the market risk, marketable securities portfolio is limited proportional to the total assets size. Board of Directors is the highest authority to set all risk management guidelines, and it is responsible for ensuring that the Group implements all necessary risk management techniques in compliance with the related regulatory requirements in Turkey.

All risk levels are set and approved by the Board of Directors on a regularly basis, and it is announced to the organization.

The Group manages its exposure to all types of risks through the Asset and Liability Committee, comprising members of senior management, and a representative of main shareholder.

In summary, in order not to be exposed to any liquidity, interest rate, market and foreign currency risk, the Parent Bank always keeps its funding structure in line with the asset structure (in terms of currency, maturity and interest rate) and hedges its positions through various derivative transactions, In addition to that, the Parent Bank does not take any speculative positions on currency, interest rate and maturity that might create any liquidity or market risk to the Group.

b) Credit risk

Credit risk represents the risk arising from the counter party's not fulfilling its responsibilities stated in the agreement either partially or totally. Credit Risk Management Committee is responsible for managing credit risk at the Group.

Total amount of credits granted to a group is subject to certain credit risk limits. According to the decision taken by the Board of Directors; the maximum amount of the loan to be granted to a group (cash and non-cash) is limited with the calculation of certain percentages of the shareholders' equity based on the rating of the group. Furthermore, concentration risk is monitored on monthly basis in terms of industry, rating by risk group and customer.

The credibility of the debtors of the Group is assessed periodically. Loan limits of the loan customers are revised periodically in line with the Group's procedures. The Group analyses the credibility of the loans within the framework of its loan policies and obtains collaterals for loans and other receivables.

The restructured and rescheduled loans are evaluated in the Group's current rating system besides the follow up method determined in the related regulation.

28 . Financial risk management objectives and policies (continued)

b) Credit risk (continued)

Credit risk by risk groups

	Individual	Corporate	Total
31 December 2020			
Performing loans	35	2,997,339	2,997,374
Loans under close monitoring	-	106,511	106,511
Non-performing loans	-	86,220	86,220
Gross	**35**	**3,190,070**	**3,190,105**
Transferred asset	-	-	-
Specific provisions for Stage 3	-	(72,526)	(72,526)
Generic provisions for Stage 1 and Stage 2	-	(25,550)	(25,550)
Total	**35**	3,091,994	**3,092,029**
31 December 2019			
Performing loans	4,022	1,922,745	1,926,767
Loans under close monitoring	-	106,978	106,978
Non-performing loans	-	161,610	161,610
Gross	**4,022**	**2,191,333**	**2,195,355**
Transferred asset	-	-	-
Reserve for possible loan losses	-	(27,419)	(27,419)
Collective impairment	-	(8,730)	(8,730)
Total	**4,022**	**2,155,184**	**2,159,206**

Exposure to credit risk

		Due from banks		Loans and advances to customers	
	Notes	31 December 2020	31 December 2019	31 December 2020	31 December 2019
Carrying amount	-	**389,061**	**472,460**	**3,092,029**	**2,159,206**
Non-performing financial assets	-	-	-	86,220	161,593
Gross amount	-	-	-	**98,076**	**161,593**
Specific provision for Stage 3	9	-	-	(72,526)	(27,419)
Generic provision for Stage 1 and 2	9	(97)	(101)	(25,550)	(8,730)
Neither past due nor impaired	-	388,964	472,359	2,985,518	2,107,655
Carrying amount	-	**388,964**	**472,359**	**2,985,518**	**2,107,655**
Restructured and rescheduled loans and other receivables	-	-	-	106,511	51,551
Carrying amount	-	-	-	106,511	**51,551**
Carrying amount (amortised cost)	-	**388,964**	**472,359**	**3,092,029**	**2,159,206**

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28. Financial risk management objectives and policies (continued)

b) Credit risk (continued)

Exposure to credit risk (continued)

Write-off policy

The Group writes off a loan balance and any related allowances for impairment losses, when Group position such that the borrower can no longer pay the obligation, or that proceeds from collateral will not sufficient to pay back the entire exposure.

Collateral policy

The Group holds collateral against loans and advances to customers in the form of mortgage interests over property, other registered securities over assets, and guarantees. Estimates of fair value are based on the value of collateral assessed at the time of borrowing, and generally are not updated except when a loan is individually assessed as impaired. Collateral generally is not held over due from banks, except when securities are held as part of reverse repurchase and securities borrowing activity. The breakdown of financial assets by type of collateral is as follows:

31 December 2020	Collaterals after rate of consideration									
Type of collateral or credit enhancement	Maximum exposure to credit risk	Cash	Securities (Cheques Acts&Stock Share)	Property (Mortgages)	Assignment of receivables	Vehicle Pledge	Other	Total collateral	Net exposure	Associated ECLs
Financial assets										
Cash and cash equivalents (including reserves at Central Bank)	517,896	-	-	-	-	-	-	-	517,896	97
Loans and advances to customers	3,527,116	13,162	318,397	20,815	255,409	269,463	-	877,246	2,649,871	98,076
of which : Large corporate clients	3,255,286	13,162	251,952	17,134	255,409	269,463	-	807,120	2,448,166	98,021
of which : SME clients	74,054	-	319	3,681	-	-	-	4,000	70,054	13
of which : Others	197,775	-	66,125	-	-	-	-	66,125	131,650	41
Other financial assets	6,176	-	-	-	-	-	-	-	6,176	92
Derivative financial instruments	39,179	-	-	-	-	-	-	-	39,179	-
Securities at fair value through OCI	325,853	-	-	-	-	-	-	-	325,853	184
Guarantees (after Credit Conversion Factor)	8,365	5,644	15,368	19,432	8,458	1,124	52	50,078	(41,713)	6,231
LCs and Acceptances (after Credit Conversion Factor)	528,315	-	-	-	-	-	-	-	528,315	3

28 . Financial risk management objectives and policies (continued)

b) Credit risk (continued)

Credit risk by risk groups

31 December 2019			Collaterals after rate of consideration							
Type of collateral or credit enhancement	**Maximum exposure to credit risk**	**Cash**	**Securities (Cheques Acts&Stock Share)**	**Property (Mortgages)**	**Assignment of receivables**	**Vehicle Pledge**	**Other**	**Total collateral**	**Net exposure**	**Associated ECLs**
Financial assets										
Cash and cash equivalents (including reserves at Central Bank)	622,146	-	-	-	-		-	-	622.146	101
Loans and advances						-				
to customers	2,263,508	18,547	480,785	79,042	128,705	99,685	2,376	809.140	1.454.368	36,159
of which : Large corporate clients	1,787,612	18,547	309,585	79,042	128,705	99,685	2,376	637.940	1.149.672	30,080
of which : SME clients	55,113	-	33,946	-	-	-	-	33.946	21.167	5
of which : Others	420,783	-	137,255	-	-	-	-	137.255	283.528	74
Other financial assets	4,263	-	-	-	-	-	-	-	4.263	62
Derivative financial instruments	11,937	-	-	-	-	-	-	-	11.937	-
Securities at fair value through OCI	70,159	-	-	-	-	-	-	-	70.159	114
Guarantees (after Credit Conversion Factor)	536,105	9,834	19,210	18,365	2,208	1,024	-	50.641	485.464	2.119
LCs and Acceptances (after Credit Conversion Factor)	8,329	-	-	-	-	-	848	848	7.481	6

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28. Financial risk management objectives and policies (continued)

b) Credit risk (continued)

Internal rating grades of the Parent Bank:

Cash Loans							
Internal rating grade	**Internal rating description**	**Internal rating category**	**12 month PD range**	**Good Rating Agency's rating**	**Average Exposure at default**	**Average PDs**	**Average LGD**
Performing							
100-90	Highest	High grade	0.0001-0.02	AAA	77,017	0.04%	45.00%
89-87	Very high+	High grade	0.0001-0.02	AA+	4,302	0.08%	45.00%
86-84	Very high	High grade	0.0001-0.02	AA	318,723	0.06%	45.00%
83-81	Very high-	High grade	0.0001-0.03	AA-	650,711	0.04%	45.00%
80-78	High+	High grade	0.0001-0.05	A+	136,330	0.04%	45.00%
77-75	High	High grade	0.0002-0.06	A	216,176	0.04%	45.00%
74-72	High-	High grade	0.0002-0.07	A-	154,893	0.09%	28.67%
71-69	Adequate level+	Standard grade	0.0003-0.12	BBB+	61,994	0.15%	44.19%
68-66	Adequate level	Standard grade	0.0005-0.17	BBB	363,558	0.07%	40.73%
65-63	Adequate level-	Standard grade	0.0007-0.26	BBB-	122,692	0.12%	42.06%
62-60	Depends on economic conditions+	Standard grade	0.001-0.36	BB+	660,555	0.28%	11.76%
59-57	Depends on economic conditions	Standard grade	0.0016-0.58	BB	749,809	0.06%	36.15%
56-54	Depends on economic conditions-	Standard grade	0.0029-1.05	BB-	71,421	0.26%	1.39%
53-51	Low level+	Sub-standard grade	0.0059-2.15	B+	29,016	0.23%	18.83%
50-48	Low level	Sub-standard grade	0.0107-3.89	B	135,290	4.93%	14.57%
47-45	Low level-	Sub-standard grade	0.0205-7.49	B-	6,609	0.77%	0.91%
44-36	Possibility of default	Sub-standard grade	0.0734-26.78	CCC	62,672	86.30%	30.07%
35-33	High default risk	Sub-standard grade	0.0734-26.78	CC	-	0.00%	0.00%
32-30	Very high default risk	Sub-standard grade	0.0734-26.78	C	-	0.00%	0.00%
Total Performing					**3,821,775**	**1.69%**	**28.11%**
Non-performing							
29-0	In default		100-100	D	86,220	100.00%	84.12%
Total Nonperforming					**86,220**	**100.00%**	**100.00%**

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28. Financial risk management objectives and policies (continued)

b) Credit risk (continued)

Internal rating grades of the Parent Bank:

Noncash Loans

Internal rating grade	Internal rating description	Internal rating category	12 month PD range	Good Rating Agency's rating	Average Exposure at default	Average PDs	Average LGD
Stage 1 & Stage 2							
100-90	Highest	High grade	0.0001-0.02	AAA	-	-	-
89-87	Very high+	High grade	0.0001-0.02	AA+	23		
86-84	Very high	High grade	0.0001-0.02	AA	1,811	0.04%	45.00%
83-81	Very high-	High grade	0.0001-0.03	AA-	7,984	0.05%	45.00%
80-78	High+	High grade	0.0001-0.05	A+	1,549	0.06%	44.18%
77-75	High	High grade	0.0002-0.06	A	-	0.00%	0.00%
74-72	High-	High grade	0.0002-0.07	A-	-	0.00%	0.00%
71-69	Adequate level+	Standard grade	0.0003-0.12	BBB+	19,727	0.39%	45.00%
68-66	Adequate level	Standard grade	0.0005-0.17	BBB	8,026	0.32%	28.06%
65-63	Adequate level-	Standard grade	0.0007-0.26	BBB-	191,209	0.26%	39.32%
62-60	Depends on economic conditions+	Standard grade	0.001-0.36	BB+	23,613	0.28%	42.75%
59-57	Depends on economic conditions	Standard grade	0.0016-0.58	BB	62,158	0.44%	39.76%
56-54	Depends on economic conditions-	Standard grade	0.0029-1.05	BB-	101,874	0.84%	43.84%
53-51	Low level+	Sub-standard grade	0.0059-2.15	B+	25,742	1.84%	43.17%
50-48	Low level	Sub-standard grade	0.0107-3.89	B	9,926	1.18%	30.56%
47-45	Low level-	Sub-standard grade	0.0205-7.49	B-	5,299	0.00%	0.00%
44-36	Possibility of default	Sub-standard grade	0.0734-26.78	CCC	8,171	51.06%	45.00%
35-33	High default risk	Sub-standard grade	0.0734-26.78	CC	-	0.00%	0.00%
32-30	Very high default risk	Sub-standard grade	0.0734-26.78	C	-	0.00%	0.00%
					467,112	1.47%	43.78%
Total Stage 1 & 2							
Noncash Loans				Good Rating			Average LGD
Internal rating grade	Internal rating description		12 month PD range	Agency's rating	Total Exposure	Average PDs	
Stage 3							
29-0	In default	Internal rating category	100-100	D	4,092	100.00%	30.95%
Total Stage 3					**4,092**	**100.00%**	**30.95%**

28 . Financial risk management objectives and policies (continued)

b) Credit risk (continued)

Segment concentration

The Group monitors concentrations of credit risk by sector and by geographic location. An analysis of concentrations of credit risk from due from banks and loans and advances to customers at the reporting date is shown below:

	Due from banks		Loans and advances to customers	
	2020	2019	2020	2019
Banks	388,964	82,376	4,017	116,731
Manufacturing	-	-	128,019	359,132
Production	-	-	128,019	359,132
Construction	-	-	766,209	294,696
Services	-	-	1,782,171	939,100
Wholesale and retail trade	-	-	111,639	66,003
Hotel food and beverage services	-	-	40,545	-
Financial institutions	-	-	879,480	568,265
Communication services	-	-	58,529	98,511
Health and social services	-	-	-	867
Renting Service	-	-	691,978	205,454
Other	-	-	397,919	315,356
Non-performing loans net	-	-	13,694	134,191
Total	**388,964**	**82,376**	**3,092,029**	**2,159,206**

	Notes	Due from banks		Loans and advances to customers	
		2020	2019	2020	2019
Turkey	-	119,468	28,763	2,821,996	1,734,067
Europe	-	194,650	60,779	195,781	220,048
Other	-	74,846	382,817	74,252	205,091
	6, 9	**388,964**	**472,359**	**3,092,029**	**2,159,206**

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28. Financial risk management objectives and policies (continued)

b) Credit risk (continued)

Information by major sectors and type of counterparties

Financial assets are assessed in 3 stages based on IFRS 9 as explained in accounting policy note 4 “Calculation of expected credit losses”. In this respect, the life time expected credit losses are recognized for impaired loans (stage 3) and the probability of default is considered to be 100%.

When the loan is not under default yet, but there is a significant increase in the credit risk since origination date, the life time expected credit losses are calculated for these loans (stage 2).

Regarding the remaining financial assets within the scope of IFRS 9, the 12-month estimated probability of default is calculated and the loss allowance for these loans (stage 1) is measured at an amount equal to 12-month (after the reporting date) expected credit losses.

	Loans(*)		
Sectors	Significant increase in credit risk (Stage 2)	Defaulted (Stage 3)	Expected Credit Losses (IFRS 9)
1. Agriculture	-	-	-
1.1. Farming and Stockbreeding	-	-	-
1.2. Forestry	-	-	-
1.3. Fishery	-	-	-
2. Manufacturing	1,199	53,594	**39,900**
2.1. Mining and Quarrying	-	-	-
2.2. Production	1,199	-	-
2.3. Electricity, Gas and Water	-	53,594	39,900
3. Construction	28,388	17	**5,089**
4. Services	58,345	32,609	**51,569**
4.1. Wholesale and Retail Trade	-	-	-
4.2. Hotel food and beverage services	-	32,414	34,414
4.3. Communication Services	-	-	-
4.4. Financial Institutions	58,345	195	19,155
4.5. Renting Services	-	-	-
4.6. Professional Services	-	-	-
4.7. Educational Services	-	-	-
4.8. Health and Social Services	-	-	-
5. Other	-	-	-
6. Total	**87,932**	**86,220**	**96,528**

(*) Including only cash loans.

28 . Financial risk management objectives and policies (continued)

b) Credit risk (continued)

Macroeconomic Scenario Analysis

Key Drivers	ECL Scenario	Assigned Probabilities	Baz	2021	2022	2023	2024	Subsequent Years
CDS Turkey- 5 Year	%	%	%	%	%	%	%	%
	Upside	30	2.00	1.96	1.92	1.88	1.84	1.80
	Base Case	50	3.00	2.97	2.94	2.91	2.85	2.85
	Downside 1	10	3.75	3.94	3.74	3.93	3.73	3.92
	Downside 2	10	4.66	5.13	4.62	5.08	4.57	5.03

Fair value through profit or loss (FVTPL)

At 31 December 2020, the Parent Bank has derivative financial assets at FVTPL amounting to TL 39,179 (31 December 2019 – TL 11,937). An analysis of the credit quality of the maximum credit exposure is as follows:

	31 December 2020	31 December 2019
Derivative financial assets	39,179	11,937
Fair value and carrying amount	**39,179**	**11,937**

c) Operational Risk

Operational risk is the risk of direct or indirect loss arising from a wide variety of causes associated with the Group's processes, personnel, technology and infrastructure, and from external factors other than credit, market and liquidity risks such as those arising from legal and regulatory requirements and generally accepted standards of corporate behaviour. Operational risks arise from all of the Group's operations and are faced by all business entities.

The operational risk items in the Group are determined in accordance with the definition of operational risk by considering the whole processes, products and departments. The control areas are set for operational risks within the Group and all operational risks are followed by assigning the risks to these control areas. In this context, appropriate monitoring methodology is developed for each control area that covers all operational risks and control frequencies are determined.

The Group calculated the value at operational risk in accordance with the "Computation of Value of Operational Risk" of the circular, "Regulation on Measurement and Assessment of Capital Adequacy Ratios of Banks" published in the Official Gazette no. 28337 dated 28 June 2012 and, using gross profit of the last three years, 2016, 2017 and 2018. The amount calculated as TL 216,763 as at 31 December 2020 (31 December 2019 - TL 198,633) represents the operational risk that the Group may expose and the amount of minimum capital requirement to eliminate this risk.

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28. Financial risk management objectives and policies (continued)

d) Capital management

BRSA, the regulatory body of the banking industry, sets and monitors capital requirements for the Bank; BRSA requires the banks to maintain a prescribed ratio of minimum 8% of total capital to total risk-weighted assets. The Group's regulatory capital is analysed into two tiers:

- Tier 1 capital, capital is composed of the total amount of paid up capital, legal, voluntary and extra reserves, profits for the period after tax provisions and profits for previous years. The total amount of banks' losses for the period and losses for previous years is taken into account as a deduction item, in the calculation of Tier 1 capital.

- Tier 2 capital, is composed of the total amount of general provisions for credits, fixed assets revaluation fund, revaluation of financial assets measured at fair value through other comprehensive income and equity investments, subordinated loans received, free reserves set aside for contingencies and the fund for increase in the value of securities.

Risk-weighted assets are determined according to specified requirements that seek to reflect the varying levels of risk attached to assets and off-balance sheet exposures. Operational risk capital requirement is calculated using Basic Indicator Approach and included in the capital adequacy calculations.

The Group's policy is to maintain a strong capital base so as to maintain investor, creditor and market confidence and to sustain future development of the business.

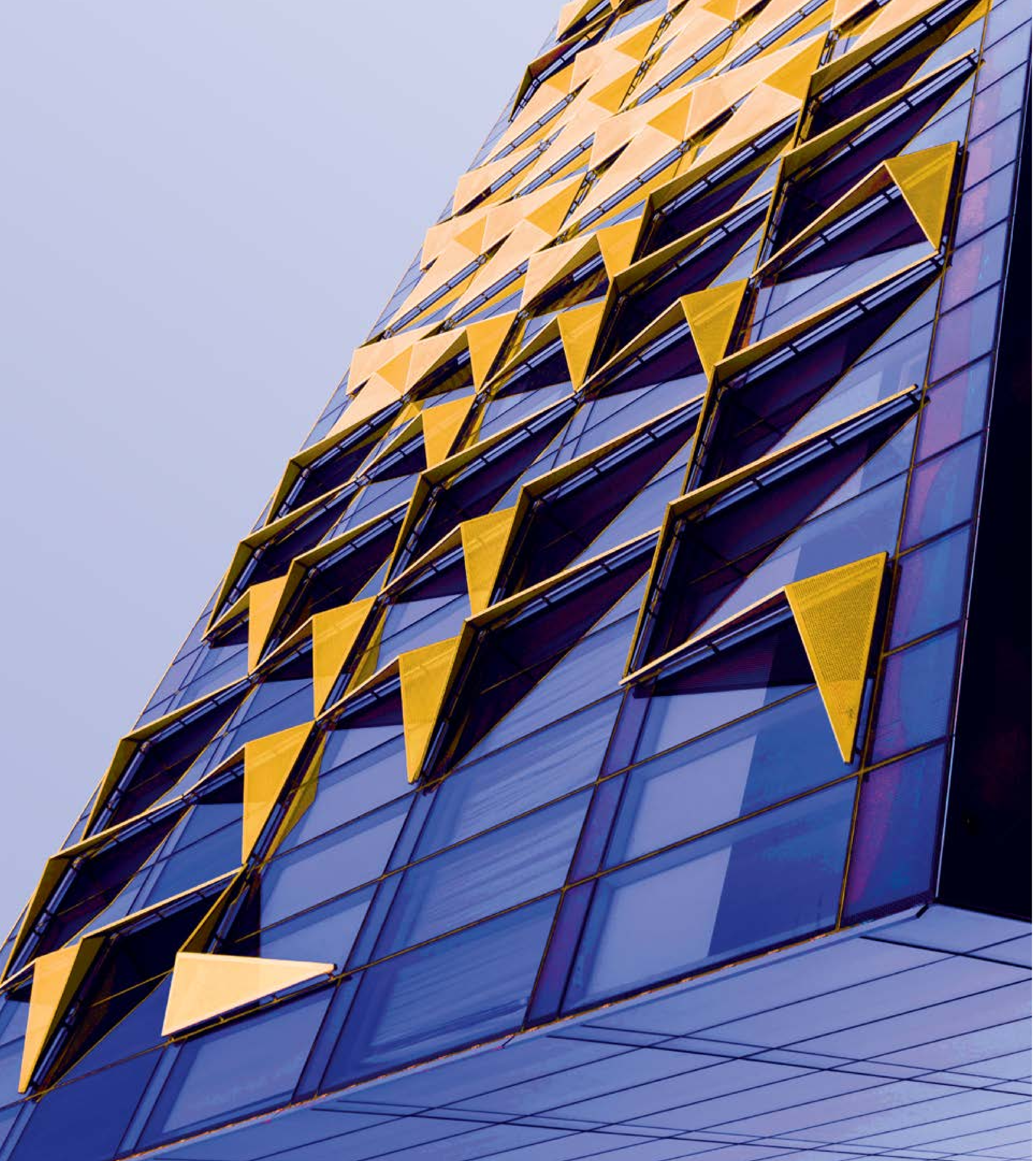
The Group and the Group's regulated operations have complied with externally imposed capital requirements throughout the period.

There have been no material changes in the Group's management of capital during the period.

The Group's capital position in accordance with BRSA regulations is as follows:

	31 December 2020	31 December 2019
Amount subject to credit risk (I)	4,121,232	3,189,103
Amount subject to market risk (II)	79,894	59,713
Amount subject to operational risk (III)	216,763	198,633
Total risk-weighted assets and value at market risk and operational risk (IV) = (I+II+II)	**4,417,889**	**3,447,449**
Shareholders' equity:		
Tier 1 capital	615,732	438,876
Tier 2 capital	139,818	100,118
Total regulatory capital	**755,550**	**538,994**
Capital adequacy ratio	**17.10%**	**15.64%**

(Currency - In thousands of Turkish Lira)



28. Financial risk management objectives and policies (continued)

e) Fair values

The determination of fair values of financial assets and financial liabilities is based on quoted market prices or dealer price quotations for financial instruments traded in active markets or valuation techniques. However, the Group expects no significant difference between the fair value and carrying value of the financial instruments below since their maturities are short-term.

The table below sets out the Group's classification of each class of financial assets and liabilities and their fair values.

	Notes	Trading	Loans and receivables	FVOCI	Other amortised cost	Total carrying amount	Fair value
2020							
Cash and cash equivalents	6	-	390,227	-	-	390,227	390,227
Reserve deposits at Central Bank	7	-	128,832	-	-	128,832	128,832
FVTPL investments		39,179					
FVOCI financial assets	8	-	-	321,953	-	321,953	321,953
Loans and advances to customers(1)	9	-	3,092,029	-	-	3,092,029	3,190,105
Other asset		-	-	-	19,261	19,261	19,261
		39,179	**3,611,088**	**321,953**	**19,261**	**3,952,302**	**4,050,378**
Funds borrowed	13	-	-	-	1,120,098	1,120,098	1,120,098
Debt securities issued(1)	14	-	-	-	722,790	722,790	722,790
Derivative financial liabilities		81,844	-	-	-	81,844	81,844
Other liabilities	16	-	-	-	1,635,898	1,635,898	1,635,898
		81,844	**-**	**-**	**3,478,786**	**2,837,840**	**2,837,840**

(1) The Group management assumes that the fair values of the loans and debt securities issued approximate their carrying values since the majority of them are short-term.

	Notes	Trading	Loans and receivables	FVOCI	Other amortised cost	Total carrying amount	Fair value
2019							
Cash and cash equivalents	6	-	473,645	-	-	473,645	473,645
Reserve deposits at Central Bank	7	-	149,683	-	-	149,683	149,683
FVTPL investments		11,937					
FVOCI financial assets	8	-	-	198,356	-	198,356	198,356
Loans and advances to customers(1)	9	-	2,159,206	-	-	2,159,206	2,123,037
Other asset		-	-	-	4,201	4,201	4,201
		11,937	**2,782,534**	**198,356**	**4,201**	**2,985,091**	**2,948,922**
Funds borrowed	14	-	-	-	904,639	904,639	1,094,143
Debt securities issued(1)	15	-	-	-	763,268	763,268	763,268
Derivative financial liabilities		43,444	-	-	-	43,444	43,444
Other liabilities	17	-	-	-	963,645	963,645	963,645
		43,444	**-**	**-**	**2,631,552**	**2,674,996**	**2,864,500**

(1) The Group management assumes that the fair values of the loans and debt securities issued approximate their carrying values since the majority of them are short-term.

28 . Financial risk management objectives and policies (continued)

e) Fair values (continued)

Loans and advances to customers

Loans and advances to customers are net of provisions for impairment. The estimated fair value of loans and advances to customers represents the discounted amount of estimated future cash flows expected to be received. Expected cash flows are discounted at current market rates to determine fair value.

Fair values of remaining financial assets and liabilities carried at cost, including cash and cash equivalents, reserve deposits at Central Bank, current account of loan customers and funds borrowed are considered to approximate their respective carrying values due to their short-term nature.

The Group measures fair values using the following fair value hierarchy that reflects the significance of the inputs used in making the measurements.

Level 1: Quoted market price (unadjusted) in an active market for identical instrument.

Level 2: Valuation techniques based on observable inputs, either directly (i.e., as prices) or indirectly (i.e., derived from prices). This category includes instruments using valuation techniques where all significant inputs are directly or indirectly observable from market data.

Level 3: Valuation techniques using significant unobservable inputs. This category includes all instruments where the valuation technique includes inputs not based on observable data and the unobservable inputs have a significant effect on the instrument's valuation.

Fair values of financial assets and financial liabilities that are traded in active markets are based on quoted market prices or dealer price quotations. For all other financial instruments, the Group determines fair values using valuation techniques.

Valuation techniques include net present value and discounted cash flow models. Assumptions and inputs used in valuation techniques include risk-free and benchmark interest rates. The objective of valuation techniques is to arrive at a fair value determination that reflects the price of the financial instrument at the reporting date that would have been determined by market participants acting at arm's length.

The Group uses widely recognised valuation models for determining the fair value of common and more simple financial instruments, like forwards and currency swaps, that use only observable market data and require little management judgement and estimation. Observable prices and model inputs are usually available in the market for listed debt securities. Availability of observable market prices and model inputs reduces the need for management judgement and estimation and also reduces the uncertainty associated with determination of fair values. Availability of observable market prices and inputs varies depending on the products and markets and is prone to changes based on specific events and general conditions in the financial markets.

NUROL YATIRIM BANKASI ANONİM ŞİRKETİ NOTES TO THE CONSOLIDATED STATEMENT AS OF AND FOR THE YEAR ENDED 31 DECEMBER 2020

(Currency - In thousands of Turkish Lira)

28. Financial risk management objectives and policies (continued)

e) Fair values (continued)

This table below analyses financial instruments measured at fair value at the end of the reporting period, by the level in the fair value hierarchy into which the fair value measurement is categorised:

31 December 2020	Note	Level 1	Level 2	Level 3	Total
Derivative financial assets		39,179	-	-	39,179
Financial assets measured at fair value through other comprehensive income	8	321,953	-	-	321,953
Derivative financial liabilities		-	81,844	-	81,844
Investment property			296,500	-	296,500

31 December 2019	Note	Level 1	Level 2	Level 3	Total
Derivative financial assets		11,937	-	-	11,937
Financial assets measured at fair value through other comprehensive income	8	198,356	-	-	198,356
Investment property		-	223,545	-	223,545
Derivative financial liabilities		-	43,444	-	43,444

e) Market risk

Market risk is the risk that changes in market prices such as interest rate, equity prices, foreign exchange rates and credit spreads will affect the Parent Bank's income or the value of its holdings of financial instruments.

The Board of Directors of the Group determines the risk limits for primary risks carried by the Group and periodically revises these limits. For the purpose of hedging market risk, the Group primarily aims to balance the foreign currency position, collateralise the loans and manage liquidity.

The market risk arising from trading portfolio is monitored, measured and reported using Standardised Approach to the legal legislation. The monthly market risk report and the weekly currency risk reports prepared are reported to BRSA.

31 December 2020 and 31 December 2019 calculated as per the statutory financial statements prepared for BRSA reporting purposes within the scope of "Regulation on Measurement and Assessment of Capital Adequacy Ratios of Banks" published in Official Gazette no. 28337 dated 28 June 2012, are as follows:

	2020			2019		
	Average	Highest	Lowest	Average	Highest	Lowest
Interest rate risk	2,056	3,226	1,204	3,851	5,344	1,916
Equity price risk	-	-	-	-	-	-
Currency risk	2,106	4,305	304	1,956	3,042	1,552
Counter party risk	-	-	-	-	-	-
Total value-at-risk	**4,162**	**7,531**	**1,508**	**5,807**	**8,386**	**3,468**

28 . Financial risk management objectives and policies (continued)

e) Market risk (continued)

Currency risk

The Group takes on exposure to effects of fluctuations in the prevailing foreign currency exchange rates on its financial position and cash flows. Foreign currency risk indicates the possibility of the potential losses that the Group is subject to due to the exchange rate movements in the market.

Position limit of the Group related with currency risk is determined according to Foreign Currency Net Position Standard ratio determined by BRSA.

The concentrations of assets, liabilities and off balance sheet items are as follows:

	USD	Euro	Others	Total
2020				
Assets				
Cash and cash equivalents	57,661	180,875	54,001	292,537
Reserve deposits at Central Bank	62,783	59,631	-	122,414
Loans and advances to customers	254,166	1,067,922	-	1,322,088
Available for sale investments	94,212	-	-	94,212
Other assets	-	-	-	-
Total assets	**468,822**	**1,308,428**	**54,001**	**1,831,251**
Liabilities				
Funds borrowed	186,718	272,195	54,755	513,668
Subordinated debts	104,384	-	-	104,384
Other liabilities	204,564	1,568,302		1,772,866
Total liabilities	495,666	1,840,497	54,755	2,390,918
Gross exposure	**(26,844)**	**(532,069)**	**(754)**	**(559,667)**
Off-balance sheet position				
Net notional amount of derivatives	26,658	536,798	-	563,456
Net exposure	**(186)**	**4,729**	**(754)**	**3,789**

NUROL YATIRIM BANKASI ANONİM ŞİRKETİ NOTES TO THE CONSOLIDATED STATEMENT AS OF AND FOR THE YEAR ENDED 31 DECEMBER 2020

(Currency - In thousands of Turkish Lira)

28. Financial risk management objectives and policies (continued)

e) Market risk (continued)

Currency risk (continued)

	USD	Euro	Others	Total
2019				
Assets				
Cash and cash equivalents	219,363	221,103	4,210	444,676
Reserve deposits at Central Bank	33,935	95,562	-	129,497
Loans and advances to customers	184,703	556,374	-	741,077
Available for sale investments	56,032	-	-	56,032
Other assets	4	-	-	4
Total assets	**494,037**	**873,039**	**4,210**	**1,371,286**
Liabilities				
Funds borrowed	101,051	227,816	3,869	332,736
Subordinated debts	90,305	-	-	90,305
Other liabilities	183,658	889,153	-	1,072,811
Total liabilities	**375,014**	**1,116,969**	**3,869**	**1,495,852**
Gross exposure	**119,023**	**(243,930)**	**341**	**(124,566)**
Off-balance sheet position				
Net notional amount of derivatives	(120,458)	245,515	-	125,057
Net exposure	**(1,435)**	**1,585**	**341**	**491**

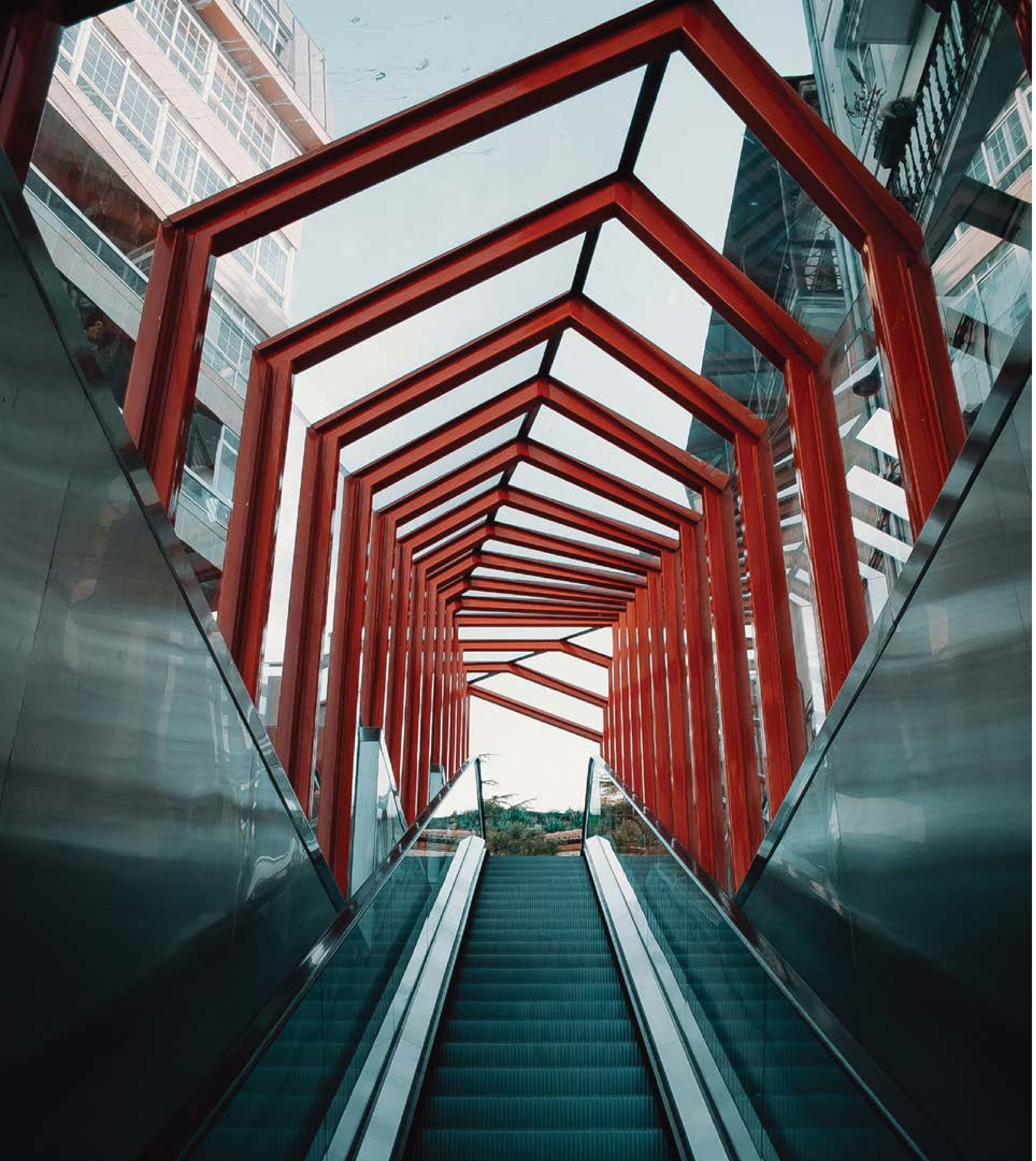
Sensitivity analysis

A 10 percent weakening of TL against the foreign currencies at 31 December 2020 and 31 December 2019 would have effect on the equity and profit or loss by the amounts shown below.

2020	Equity	Profit or loss
EUR	473	473
USD	(18)	(18)
Other currencies	(76)	(76)
Total	**379**	**379**

2019	Equity	Profit or loss
EUR	159	159
USD	(149)	(144)
Other currencies	34	34
Total	**44**	**49**

(Currency - In thousands of Turkish Lira)



28. Financial risk management objectives and policies (continued)

e) Market risk (continued)

Interest rate risk

Interest rate risk that would arise from the changes in interest rates depending on the Group's position is managed by the Asset and Liability Committee of the Group.

Interest rate sensitivity of assets, liabilities and off balance sheet items is analysed by top management in the Asset and Liability Committee meetings held every week by taking the market developments into consideration.

The Management of the Group follows the interest rates in the market on a daily basis and revises interest rates of the Group when necessary.

The following table indicates the periods in which financial assets and liabilities reprice as of 31 December 2020 and 31 December 2019:

	Less than 1 month	1-3 months	3-12 months	1-5 years	More than 5 years	Non interest bearing	Total
As at 31 December 2020							
Assets							
Cash and cash equivalents	3,288	-	-	-	-	386,939	390,227
Reserve deposits at Central Bank	122,414	-	-	-	-	6,418	128,832
FVTPL investments	38,505	674	-	-	-	-	39,179
Financial assets at fair value through other	25,469	53,561	32,901	-	-	210,022	321,953
comprehensive income	1,949,277	308,728	470,183	333,114	17,033	13,694	3,092,029
Loans and advances to customers	-	-	-	-	-	353,124	353,124
Other assets	2,138,953	362,963	503,084	333,114	17,033	970,197	4,325,344
Total assets							
Liabilities							
Funds borrowed(*)	212,957	170,048	212,464	8	61,925	499,854	1,157,256
Debt securities issued(**)	97,343	289,348	185,105	150,994	76,056	-	798,846
Other liabilities(***)	1,054,626	558,604	21,898	-	-	734,114	2,369,242
Total liabilities	**1,364,926**	**1,018,000**	**419,467**	**151,002**	**137,981**	**1,233,968**	**4,325,344**
On balance sheet interest sensitivity gap	774,027	(655,037)	83,617	182,112	(120,948)	(263,771)	-
Off balance sheet interest sensitivity gap	-	-	-	-	-	-	-
Total interest sensitivity gap	**774,027**	**(655,037)**	**83,617**	**182,112**	**(120,948)**	**(263,771)**	-

(*) Includes subordinated loans amounting to TL 37,158.
(**) Includes subordinated bonds amounting to TL 76,056.
(***) Derivative financial instruments are included in other liabilities.

28 . Financial risk management objectives and policies (continued)

e) Market risk (continued)

Interest rate risk (continued)

	Less than 1 month	1-3 months	3-12 months	1-5 years	More than 5 years	Non interest bearing	Total
As at 31 December 2019							
Assets							
Cash and cash equivalents	48,669	-	-	-	-	424,976	473,645
Reserve deposits at Central Bank	129,497	-	-	-	-	20,186	149,683
FVTPL investments	6,969	4,534	434	-	-	-	11,937
Financial assets at fair value through other		30,951	16,770	1,011	-	131,847	198,356
comprehensive income	17,777	61,038	319,015	471,236	24,062	-	2,159,206
Loans and advances to customers	1,283,855	-	-	-	-	261,123	261,123
Other assets	-	96,523	336,219	472,247	24,062	838,132	3,253,950
Total assets	**1,486,767**						
Liabilities							
Funds borrowed(*)	301,077	91,599	126,442	-	52,877	362,405	934,400
Debt securities issued(**)	122,034	436,859	204,375	-	60,544	-	823,812
Other liabilities(***)	532,715	374,442	49,771	-	-	538,810	1,495,738
Total liabilities	**955,826**	**902,900**	**380,588**	-	**113,421**	**901,215**	**3,253,950**
On balance sheet interest sensitivity gap	530,941	(806,377)	(44,369)	472,247	(89,359)	(63,083)	-
Off balance sheet interest sensitivity gap	-	-	-	-	-	-	-
Total interest sensitivity gap	**530,941**	**(806,377)**	**(44,369)**	**472,247**	**(89,359)**	**(63,083)**	-

(*) Includes subordinated loans amounting to TL 37,158.
(**) Includes subordinated bonds amounting to TL 76,056.
(***) Derivative financial instruments are included in other liabilities.

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(Currency - In thousands of Turkish Lira)

28. Financial risk management objectives and policies (continued)

e) Market risk (continued)

Summary of average interest rates

As at 31 December 2020 and 31 December 2019, the summary of average interest rates for different assets and liabilities are as follows:

	31 December 2020			31 December 2019		
	Euro	USD	TL	Euro	USD	TL
Assets						
Cash and balances with the Central Bank	-	-	5.00	-	1,50	13,00
Due from banks	0.02	0.49	9.57	0,03	2,39	18,23
FVTPL investments	-	-	-	-	-	-
Placements at money markets	-	-	8.66	-	-	-
FVTOCI investments		8.73	19.34	-	10,07	29,49
Loans and advances to customers	6.91	8.48	17.26	6,74	8,56	25,08
Other	-	-	-	-	-	-
Liabilities						
Money market borrowings	0.18	0.58	5.34	0,71	1,64	9,70
Funds borrowed	6.87	8.02	9.89	6,37	7,13	16,81
Debt securities issued	-	10.00	12.65	-	10,00	19,13
Funds from other financial institutions	1.16	0.51	10.07	3,78	3,96	21,83

28 . Financial risk management objectives and policies (continued)

e) Market risk (continued)

Interest rate risk (continued)

Liquidity risk

Liquidity risk is the risk that the Group will encounter difficulty in meeting obligations associated with its financial liabilities that are settled by delivering cash or another financial asset.

Liquidity risk is a substantial risk in the Turkish market, which exhibits significant volatility.

As a result of COVID-19 pandemic, Against liquidity problems that could occur due to fluctuations in financial markets, the Bank has updated its Liquidity Emergency Action Plan and has prepared a Liquidity Action Plan to further increase its existing liquidity. The Parent Bank has designed separate measures for both its assets and liabilities, and has immediately initiated the necessary efforts to implement these measures.

Management of liquidity risk

In order to manage this risk, the Group measures and manages its cash flow commitments on a daily basis and maintains liquid assets, which it judges sufficient to meet its commitments.

As at 31 December 2020 and 31 December 2019, the following table provides the contractual maturities of the Group's financial liabilities.

	31 December 2020						
	Carrying Amount	Contractual cash flows	6 month or less	6 to 12 months	1 to 2 years	2 to 5 years	More than 5 years
Funds borrowed	1,120,098	1,163,315	938,128	153,947	33,294	-	37,946
Debt securities Issued	722,790	795,790	598,099	-	197,691	-	-
	1,842,888	**1,959,105**	**1,536,227**	**153,947**	**230,985**	-	**37,946**

	31 December 2019						
	Carrying Amount	Contractual cash flows	6 month or less	6 to 12 months	1 to 2 years	2 to 5 years	More than 5 years
Funds borrowed	904,639	1,094,143	932,081	96,101	-	-	65,961
Debt securities Issued	763,268	803,320	702,365	100,955	-	-	-
	1,667,907	**1,897,463**	**1,634,446**	**197,056**	-	-	**65,961**

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(Currency - In thousands of Turkish Lira)

28. Financial risk management objectives and policies (continued)

e) Market risk (continued)

Exposure to liquidity risk

Maturity analysis of monetary assets and liabilities according to their remaining maturities is presented below:

31 December 2020	Demand	Less than 1 month	1-3 months	3-12 months	1-5 years	Over 5 years	Unidentified maturity	Total
Cash and cash equivalents	386,939	3,288	-	-	-	-	-	390,227
Reserve deposits	6,418	122,414						128,832
FVTPL investments	-	38,505	674	-	-	-	-	39,179
Available for sale investments	-	-	-	4,342	43,649	63,940	210,022	321,953
Loans and advances to customers	-	1,949,277	308,728	470,183	350,147	-	13,694	3,092,029
Other assets	8	34,183	-	-	-	-	318,933	353,124
Total assets	**393,365**	**2,147,667**	**309,402**	**474,525**	**393,796**	**63,940**	**542,649**	**4,325,344**
Funds borrowed (*)	499,854	212,957	170,048	212,464	8	61,925	-	1,157,256
Debt securities issued(**)	-	97,343	289,348	185,105	150,994	76,056	-	798,846
Other liabilities	104,143	1,054,634	558,604	21,890	0	-	629,971	2,369,242
Total liabilities	**603,997**	**1,364,934**	**1,018,000**	**419,459**	**151,002**	**137,981**	**629,971**	**4,325,344**
Liquidity gap	**(210,632)**	**782,733**	**(708,598)**	**55,066**	**242,794**	**(74,041)**	**(87,322)**	-
Off Balance Sheet Position	-	**(5,560)**	**(10,179)**	**(673)**	**(38,854)**	-	-	(55,266)
Receivables from derivatives	-	2,444,288	553,662	14,383	35,340	-	-	3,047,673
Liabilities from derivatives	-	2,449,848	563,841	15,056	74,194	-	-	3,102,939
Non cash loans	-	**3,000**	**35,841**	**46,381**	**99,959**	**691,335**	-	**876,516**

(*) Includes subordinated loans amounting to TL 37,158.
(**) Includes subordinated bonds amounting to TL 76,056.
(***) Derivative financial instruments are included in other liabilities.

(Currency - In thousands of Turkish Lira)

28. Financial risk management objectives and policies (continued)

e) Market risk (continued)

Exposure to liquidity risk (continued)

31 December 2019	Demand	Less than 1 month	1-3 months	3-12 months	1-5 years	Over 5 years	Unidentified maturity	Total
Cash and cash equivalents	424,976	48,669	-	-	-	-	-	473,645
Reserve deposits	20,186	129,497	-	-	-	-	-	149,683
FVTPL investments	-	6,969	4,534	434	-	-	-	11,937
Available for sale investments	-	-	-	3,333	14,871	48,305	131,847	198,356
Loans and advances to customers	-	1,283,855	61,038	319,015	495,298	-	-	2,159,206
Other assets	5	25,632	-	-	-	-	235,486	261,123
Total assets	**445,167**	**1,494,622**	**65,572**	**322,782**	**510,169**	**48,305**	**367,333**	**3,253,950**
Funds borrowed (*)	362,406	301,077	91,598	126,442	-	52,877	-	934,400
Debt securities issued(**)	-	122,034	436,859	204,375	-	60,544	-	823,812
Other liabilities	87,722	532,725	374,443	49,771	-	-	451,077	1,495,738
Total liabilities	**450,128**	**955,836**	**902,900**	**380,588**	**-**	**113,421**	**451,077**	**3,253,950**
Liquidity gap	**(4,961)**	**538,786**	**(837,328)**	**(57,806)**	**510,169**	**(65,116)**	**(83,744)**	**-**
Off Balance Sheet Position	**-**	**(13,524)**	**(2,633)**	**(10,752)**	**(24,068)**	**-**	**-**	**(50,977)**
Receivables from derivatives	-	989,602	373,635	146,304	35,332	-	-	1,544,873
Liabilities from derivatives	-	1,003,126	376,268	157,056	59,400	-	-	1,595,850
Non cash loans	**-**	**450**	**54,656**	**73,124**	**76,853**	**720,770**	**-**	**925,853**

(*) Includes subordinated loans amounting to TL 29,761.
(**) Includes subordinated bonds amounting to TL 60,544.
(***) Derivative financial instruments are included in other liabilities.

29 . Related parties

Parties are considered to be related if one party has the ability to control the other party or exercise significant influence over the other party in making the financial and operating decisions.

In the course of conducting its banking business, the Group conducted various business transactions with related parties. These include loans, customer accounts, funds borrowed and non-cash transactions. The volumes of related party transactions, outstanding balances at year-end and relating expense and income for the period are as follows:

31 December 2020	Balance	Percentage of the financial statement amount (%)
Cash loans	840,248	26%
Non-cash loans	22,184	3%
Borrower funds / Funds borrowed	158,758	23%

31 December 2019	Balance	Percentage of the financial statement amount (%)
Cash loans	331,465	15%
Non-cash loans	19,369	2%
Borrower funds / Funds borrowed	110,136	12%

31 December 2020	Balance	Percentage of the financial statement amount (%)
Interest income and commissions	102,936	27%
Other operating expense (-)	6,655	14%

31 December 2019	Balance	Percentage of the financial statement amount (%)
Interest income and commissions	62,654	14%
Other operating expense (-)	6,330	7%

NUROL YATIRIM BANKASI ANONİM ŞİRKETİ NOTES TO THE CONSOLIDATED STATEMENT AS OF AND FOR THE YEAR ENDED 31 DECEMBER 2020

(Currency - In thousands of Turkish Lira)

29. Related parties (continued)

As at 31 December 2020, no provisions have been recognised in respect of loans given to related parties (31 December 2019 – none).

Compensation of key management personnel of the Bank

The executive and non-executive member of Board of Directors and management received remuneration and fees amounted to TL 12,997 comprising salaries and other benefits for the period 1 January-31 December 2020 (1 January - 31 December 2019: TL 12,671).

30. Events after balance sheet date

None.

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