

**Anadolubank Anonim Őirketi
And Its Subsidiaries**

Consolidated Financial Statements
As at and For The Year Ended
31 December 2021
With Independent Auditor's Report Thereon

Independent Auditor's Report

To the General Assembly of Anadolubank Anonim Şirketi,

Opinion

We have audited the consolidated financial statements of Anadolubank Anonim Şirketi (“the Bank”) and its subsidiaries (together will be referred as “the Group”), which comprise the consolidated statement of financial position as at 31 December 2021, the consolidated statements of profit or loss and other comprehensive income, changes in equity and cash flows for the year then ended, and notes, comprising significant accounting policies and other explanatory information.

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 2021 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 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 judgment, were of most significance in our audit of the consolidated financial statements of the current period. These matters were addressed in the context of our audit of the consolidated 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
<p data-bbox="181 613 756 645">Impairment of loans in accordance with TFRS 9</p> <p data-bbox="181 696 818 958">Impairment of loans is a key area of judgement for the management. The Group has the total loans and advances to customers and factoring receivables amounting to TL 26,304,388 thousands, which comprise 61% of the Group's total assets in its consolidated financial statement and the total provision for impairment amounting to TL 912,210 as at 31 December 2021.</p> <p data-bbox="181 987 818 1128">As of 1 January 2018, the Group has started to recognize provisions for impairment on loans measured at amortized cost in accordance with TFRS 9.</p> <p data-bbox="181 1167 818 1330">The expected credit loss estimates are required to be unbiased, probability-weighted and should include supportable information about past events, current conditions, and forecasts of future economic conditions.</p> <p data-bbox="181 1384 818 1646">The Group exercises significant decisions using judgement, interpretation and assumptions over calculating loan impairments. These judgments, interpretations and assumptions are key in the development of the financial models. In addition, impairment of loans and receivables consist of significant judgments and assumptions regarding with Covid 19 effects.</p> <p data-bbox="181 1700 818 1930">Not fulfilling the requirements of the IFRS 9 is a potential risk for the Bank. Failure in determining the loans and receivables that are impaired and not recording the adequate provision for these impaired loans is the aforementioned risk. Accordingly, impairment of loans and receivables is considered as a key audit matter.</p>	<p data-bbox="847 613 1404 680">As part of our audit work, the following procedures were performed:</p> <p data-bbox="847 730 1404 965">We assessed and tested the design, implementation and operating effectiveness of key controls applied by the Group with respect to classification of loans and determination and calculation of impairments. Our information system experts have also participated to perform these procedures.</p> <p data-bbox="847 1014 1404 1144">We have assessed and analysed the relevant contract terms to assess management's accounting policy and classification of the instrument for selected samples.</p> <p data-bbox="847 1193 1404 1462">We have performed loan review procedures on selected samples of loans and receivables considering effects of Covid 19 with the objective of identifying whether the loss event had occurred and whether the provision for impairment has been recognized in a timely manner within the framework of the provisions of the relevant legislation.</p> <p data-bbox="847 1512 1404 2011">We have tested relevant inputs and assumption used by the management in each stage of the expected credit loss calculation by considering whether the inputs and assumptions appear reasonable regarding with Covid 19 effects, the relationship between the assumptions and whether the assumptions are interdependent and internally consistent, whether the assumptions appropriately reflect current market information and collections, and whether the assumptions appear reasonable when considered collectively with other assumptions, including those for the same accounting estimates and those for other accounting estimates.</p>

We have tested historical loss data to validate the completeness and accuracy of key parameters.

We have tested whether the model is applied to appropriate segments of assets which share credit risk characteristics and whether the historical loss rates were incurred under economic conditions representative of those that may exist during the assets' exposure periods.

We tested the application of the model to the relevant inputs and the mathematical integrity of each stage of the expected credit loss calculation.

Based on our discussions with the Group management, we evaluated whether the key assumptions and other judgements considering Covid 19 effects underlying the estimations of impairments were reasonable.

We assessed expected credit losses determined based on individual assessment per Group's policy by means of supporting data and evaluated appropriateness via communications with management considering Covid 19 effects.

Our specialists are involved in all procedures related to models and assumptions.

We have reviewed disclosures made within the IFRS 9 framework in the financial statements and respective notes of the Group with respect to loans and receivables and related impairment provisions.

Information Technologies Audit

The Bank and its finance functions are dependent on the IT-infrastructure for the continuity of its operations, and the demand for technology-enabled business services is rapidly growing in the Bank and its subsidiaries. Controls over reliability and continuity of the electronic data processing are within the scope of the information systems internal controls audit. The reliance on information systems within the Bank means that the controls over access rights, continuity of systems, privacy and integrity of the electronic data are critical and found to be key area of focus as part of our risk based scoping.

Procedures within the context of our information technology audit work:

- We identified and tested the Group's controls over information systems as part of our audit procedures.

- Information generation comprise all layers of information systems (including applications, networks, transmission systems and database). The information systems controls tested are categorized in the following areas:

- Security management

- Changes management

- Operations management

- We selected high-risk areas as, database logging and change management control activities, to prevent and detect whether accesses to financial data had been identified in a timely manner.

- We tested the accesses and logging controls underlying all applications that have direct or indirect impacts on financial data generation.

- Automated controls and integration controls are tested to underly and detect changes and accesses in the process of financial data generation.

- We also tested the appropriateness and accuracy of the information produced by the entity and information used in controls reports as inputs to our controls and outputs generated by the IT components.

- Finally, we understood and tested the controls over database, network, application and operating system layers of applications.



Responsibilities of Management and Those Charged with Governance for the Consolidated Financial Statements

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

In preparing the consolidated financial statements, 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.

Those charged with governance 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 scepticism 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 management.
- Conclude on the appropriateness of management'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 those charged with governance 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 those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and 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 those charged with governance, 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 on the audit resulting in this independent auditor's report is Mehmet Erol.

DRT BAĞIMSIZ DENETİM VE SERBEST MUHASEBECİ MALİ MÜŞAVİRLİK A.Ş.
Member of **DELOITTE TOUCHE TOHMATSU LIMITED**

Mehmet Erol
Partner
İstanbul, 14 June 2022

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ANADOLUBANK ANONİM ŞİRKETİ AND ITS SUBSIDIARIES
CONSOLIDATED STATEMENT OF FINANCIAL POSITION AS AT 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

	<i>Notes</i>	31 December 2021	31 December 2020
ASSETS			
Cash and cash equivalents	5	710,871	352,282
Balances with central bank	6	2,514,256	997,775
Reserve deposits at central bank	6	2,860,542	1,179,903
Loans and advances to banks and other financial institutions	5	4,758,111	2,064,835
Receivables from reverse repurchase transactions	5	-	270,133
Financial assets at fair value through profit or loss	7	11,185	74,385
Derivative financial assets held for trading	8	1,159,776	161,245
Investment securities	9	4,631,746	6,384,948
<i>Financial assets at fair value through other comprehensive income</i>		<i>1,377,205</i>	<i>2,160,694</i>
<i>Financial assets measured at amortised cost</i>		<i>3,254,541</i>	<i>4,224,254</i>
Loans and receivables	10, 11	25,392,178	17,715,566
Property and equipment	12	419,749	332,898
Intangible assets	13	26,951	16,166
Deferred tax assets	20	93,033	53,932
Current tax assets	20	44,973	8,246
Other assets	14	764,549	667,575
Total assets		43,387,920	30,279,889
LIABILITIES			
Deposits from banks	15	103,014	119,876
Deposits from customers	15	33,299,343	19,653,723
Obligations under repurchase agreements	15	1,957,299	4,608,113
Interbank money market borrowings	15	249,857	250,995
Funds borrowed	16	1,620,269	1,319,223
Debt securities issued	17	-	-
Derivative financial liabilities held for trading	8	566,422	202,492
Current tax liabilities	20	9,683	28,588
Obligations from leasing transactions	18	92,708	86,198
Other liabilities and provisions	19	1,073,459	781,726
Total liabilities		38,972,054	27,050,934
EQUITY			
Share capital	21	1,102,619	602,619
Legal reserves	21	136,838	116,072
Other reserves	21	126,204	66,219
Translation reserve	21	1,237,594	624,652
Hedging reserve	21	(797,364)	(321,267)
Fair value reserve	21	(81,143)	(31,327)
Retained earnings		2,682,752	2,166,154
Total equity attributable to equity holders of the Bank		4,407,500	3,223,122
Non-controlling interests	21	8,366	5,833
Total equity		4,415,866	3,228,955
Total liabilities and equity		43,387,920	30,279,889

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

ANADOLUBANK ANONİM ŞİRKETİ AND ITS SUBSIDIARIES
CONSOLIDATED STATEMENT OF PROFIT OR LOSS
FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

	<i>Notes</i>	2021	2020
Continuing operations:			
Interest income:			
Interest on loans and receivables	23	2,830,257	1,760,956
Interest on marketable securities	23	522,278	440,997
Interest on loans and advances to banks and other financial institutions	23	73,800	21,784
Interest on other money market placements	23	7,796	29,605
Other interest income	23	11,918	15,880
Total interest income		3,446,049	2,269,222
Interest expenses:			
Interest on deposits	23	(1,820,149)	(1,073,731)
Interest on other money market deposits	23	(497,793)	(367,132)
Interest on funds borrowed	23	(104,989)	(42,304)
Interest on securities issued	23	-	(12,531)
Interest on finance lease expenses	23	(16,201)	(16,424)
Other interest expenses	23	(14,723)	(23,105)
Total interest expenses		(2,453,855)	(1,535,227)
Net interest income		992,194	733,995
Fee and commission income	24	332,188	230,135
Fee and commission expenses	24	(43,343)	(29,578)
Net fee and commission income		288,845	200,557
Trading income from marketable securities		27,340	12,303
Trading gains/(losses) from derivatives, net		1,001,946	(34,028)
Foreign exchange gain/(loss), net		(848,667)	77,287
Other income		53,007	96,081
Revenue		1,514,665	1,086,195
Salaries and employee benefits	25	(424,246)	(348,243)
Provision for possible loan losses, net of recoveries	10	(52,801)	(19,636)
Depreciation and amortisation		(52,818)	(42,505)
Taxes other than on income		(51,033)	(30,818)
Other expenses	26	(243,111)	(126,786)
Profit before tax		690,656	518,207
Income tax expense	20	(135,804)	(101,326)
Profit for the year		554,852	416,881
Profit for the year attributable to:			
Equity holders of the Bank		552,304	415,313
Non-controlling interests		2,548	1,568
Profit for the year		554,852	416,881
Basic earnings per share from continuing operations (full TL)		0.000502	0.000692

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

ANADOLUBANK ANONİM ŞİRKETİ AND ITS SUBSIDIARIES
CONSOLIDATED STATEMENT OF PROFIT OR LOSS AND OTHER COMPREHENSIVE
INCOME FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira (“TL”) unless otherwise stated.)

	<i>Notes</i>	1 January - 31 December 2021	1 January - 31 December 2020
Profit for the year		554,852	416,881
Other comprehensive income:			
Items that will not be reclassified to profit or loss			
Revaluation of property and equipment		70,217	5,400
Remeasurements of defined benefit liability	19	(3,801)	(2,765)
Equity investments at FVOCI – change in fair value		8,272	3,950
<i>Related tax</i>	20	(8,553)	(639)
Items that will be reclassified to profit or loss			
Foreign currency translation differences for foreign operations		612,942	237,857
Gain / (loss) on hedges of net investments in foreign operations		(592,322)	(235,613)
Debt investments at FVOCI – change in fair value		(73,536)	(18,724)
<i>Related tax</i>	20	136,094	50,206
Gain / (loss) on hedges of net investments in cash flow		(2,239)	(8,450)
Other comprehensive income for the year, net of income taxes		147,074	31,222
Total comprehensive income for the year		701,926	448,103
Equity holders of the Bank		699,378	446,535
Non-controlling interests		2,548	1,568
Total comprehensive income for the year		701,926	448,103

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

ANADOLUBANK ANONİM ŞİRKETİ AND ITS SUBSIDIARIES
CONSOLIDATED STATEMENT OF CHANGES IN EQUITY
FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira (“TL”) unless otherwise stated.)

	Notes	Attributable to equity holders of the Bank							Total	Non-controlling interests	Total
		Share capital	Legal reserves	Other reserves	Translation reserve	Hedging reserve	Fair value reserve	Retained earnings			
Balances at 1 January 2020	<i>21</i>	602,619	96,746	63,571	386,795	(124,326)	(18,984)	1,770,169	2,776,590	4,265	2,780,855
Adjustment on initial application of IFRS 9 (Net of tax)		-	-	-	-	-	-	-	-	-	-
Adjusted balance at 1 January 2020		602,619	96,746	63,571	386,795	(124,326)	(18,984)	1,770,169	2,776,590	4,265	2,780,855
Net profit for the year		-	-	-	-	-	-	415,313	415,313	1,568	416,881
Other comprehensive income		-	-	2,648	237,857	(196,941)	(12,343)	1	31,222	-	31,222
Remeasurements of defined benefit liability		-	-	(2,765)	-	-	-	-	(2,765)	-	(2,765)
Revaluation of property and equipment		-	-	5,400	-	-	-	-	5,400	-	5,400
Foreign operations – foreign translation differences		-	-	-	237,857	-	-	-	237,857	-	237,857
Gain on hedges of net investment in foreign operations		-	-	-	-	(235,613)	-	-	(235,613)	-	(235,613)
Equity investments at FVOCI – change in fair value		-	-	-	-	(8,450)	-	-	-	-	-
Debt investments at FVOCI – change in fair value		-	-	-	-	-	3,950	-	3,950	-	3,950
<i>Tax on other comprehensive income</i>		-	-	-	-	-	(18,724)	-	(18,724)	-	(18,724)
Total comprehensive income for the year		-	-	2,648	237,857	(196,941)	(12,343)	415,314	446,535	1,568	448,103
Transactions with owners, recorded directly in equity		-	19,326	-	-	-	-	(19,326)	-	-	-
Transfers to other reserves		-	19,326	-	-	-	-	(19,326)	-	-	-
Balances at 31 December 2020	<i>21</i>	602,619	116,072	66,219	624,652	(321,267)	(31,327)	2,166,154	3,223,122	5,833	3,228,955

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

ANADOLUBANK ANONİM ŞİRKETİ AND ITS SUBSIDIARIES
CONSOLIDATED STATEMENT OF CHANGES IN EQUITY
FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira (“TL”) unless otherwise stated.)

	Notes	Attributable to equity holders of the Bank							Non-controlling interests	Total	
		Share capital	Legal reserves	Other reserves	Translation reserve	Hedging reserve	Fair value reserve	Retained earnings			
Balances at 1 January 2021	<i>21</i>	602,619	116,072	66,219	624,652	(321,267)	(31,327)	2,166,154	3,223,122	5,833	3,228,955
Adjustment on initial application of IFRS 9 (Net of tax)		-	-	-	-	-	-	-	-	-	-
Adjusted balance at 1 January 2021		602,619	116,072	66,219	624,652	(321,267)	(31,327)	2,166,154	3,223,122	5,833	3,228,955
Net profit for the year		-	-	-	-	-	-	552,304	552,304	2,548	554,852
Other comprehensive income		-	-	60,045	612,942	(476,097)	(49,816)	-	147,074	-	147,074
Remeasurements of defined benefit liability		-	-	(3,801)	-	-	-	-	(3,801)	-	(3,801)
Revaluation of property and equipment		-	-	70,217	-	-	-	-	70,217	-	70,217
Foreign operations – foreign translation differences		-	-	-	612,942	-	-	-	612,942	-	612,942
Gain on hedges of net investment in foreign operations		-	-	-	-	(592,322)	-	-	(592,322)	-	(592,322)
Gain / (loss) on hedges of net investments in cash flow		-	-	-	-	(2,239)	-	-	(2,239)	-	(2,239)
Equity investments at FVOCI – change in fair value		-	-	-	-	-	8,272	-	8,272	-	8,272
Debt investments at FVOCI – change in fair value		-	-	-	-	-	(73,536)	-	(73,536)	-	(73,536)
Tax on other comprehensive income		-	-	(6,371)	-	118,464	15,448	-	127,541	-	127,541
Total comprehensive income for the year		-	-	60,045	612,942	(476,097)	(49,816)	-	147,074	-	147,074
Transactions with owners, recorded directly in equity		500,000	20,766	(60)	-	-	-	(35,706)	485,000	-	485,000
Transfers to other reserves		-	20,766	-	-	-	-	(20,766)	-	-	-
Capital increase in cash		485,000	-	-	-	-	-	-	485,000	-	485,000
Capital increase from internal sources		15,000	-	(60)	-	-	-	(14,940)	-	-	-
Increase or Decrease as the result of other changes		-	-	-	-	-	-	-	-	(15)	(15)
Balances at 31 December 2021	<i>21</i>	1,102,619	136,838	126,204	1,237,594	(797,364)	(81,143)	2,682,752	4,407,500	8,366	4,415,866

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

ANADOLUBANK ANONİM ŞİRKETİ AND ITS SUBSIDIARIES
CONSOLIDATED STATEMENT OF CASH FLOWS
FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

	<i>Notes</i>	1 January - 31 December 2021	1 January - 31 December 2020
Cash flows from operating activities:			
Profit for the year		554,852	416,881
Adjustments for:			
Taxation	20	135,804	101,326
Provision for loan losses	10	52,801	19,636
Depreciation and amortisation	12,13	52,818	42,505
Provision for retirement pay liability	19	9,632	8,649
Unused vacation accruals	19	6,277	5,259
Derivative financial instruments		(634,601)	21,060
Net interest income		(971,574)	(731,751)
Other		2,494,374	523,049
		1,700,383	406,614
Changes in:			
Reserve deposits at the Central Bank		(3,555,709)	(1,378,598)
Financial assets at fair value through profit or loss		60,599	(64,824)
Loans and receivables		(7,281,481)	(3,110,341)
Funds borrowed (net)		296,628	635,787
Other assets		(1,429,573)	(583,697)
Deposits from other banks and customers		13,694,855	4,003,758
Other liabilities and provisions		(1,992,176)	4,573,641
Blocked loans and advances to banks and other financial institutions		(107,734)	-
Loans and advances to banks with original maturity of more than 3 months		-	(19,482)
		1,385,792	4,462,858
Interest received		3,312,285	2,202,067
Interest paid		(2,507,466)	(1,506,146)
Retirement benefits paid	19	(5,915)	(6,418)
Unused vacation liability paid	19	(1,873)	(1,626)
Income taxes paid		(152,313)	(84,078)
Net cash provided by operating activities		2,030,510	5,066,657
Cash flows from investing activities			
Acquisition of financial assets measured at amortised cost	9	(234,492)	(4,454,907)
Proceeds from sale of financial assets measured at amortised cost	9	1,513,189	892,395
Acquisition of property and equipment	12	(31,927)	(28,717)
Proceeds from sale of property and equipment	12	52,482	22,016
Acquisition of intangible assets	13	(17,320)	(9,165)
Acquisitions of financial assets at FVOCI	9	(222,067)	(1,260,905)
Proceeds from sale of financial assets at FVOCI	9	294,372	72,947
Net cash used in investing activities		1,354,237	(4,766,336)
Cash flows from financing activities			
Proceeds from issue of debt securities		-	437,355
Proceeds from capital increase		485,000	-
Repayment of debt securities		(47,052)	(651,414)
Leasing payments		(42,306)	(36,624)
Net cash provided by financing activities		395,642	(250,683)
Effect of exchange rate fluctuations on cash held		374,093	89,094
Net increase in cash and cash equivalents		4,154,482	138,732
Cash and cash equivalents at the beginning of the year	5	3,666,781	3,528,049
Cash and cash equivalents at the end of the year	5	7,821,263	3,666,781

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

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1. General information

Anadolubank Anonim Şirketi (the “Bank”) started its operations on 25 September 1997 in Turkey under the Turkish Banking Law and the Turkish Commercial Code pursuant to the permit of the Turkish Undersecretariat of Treasury dated 25 August 1997 and numbered 39692. The Bank provides corporate, commercial and retail banking services through a network of 115 (31 December 2020: 114) domestic branches. The address of the headquarters and registered office of the Bank is Saray Mahallesi Toya Sokak No: 3 Ümraniye / Istanbul-Turkey.

The ultimate parent of the Bank is Habaş Sınai ve Tıbbi Gazlar İstihsal Endüstrisi AŞ. Habaş Sınai ve Tıbbi Gazlar İstihsal Endüstrisi AŞ was founded by Hamdi Başaran in 1956 with the name “Hamdi Başaran Topkapı Oxygen Plant” to implement modern industrial gas production.

The Bank has three subsidiaries, which are Anadolu Yatırım Menkul Kıymetler AŞ (“Anadolu Yatırım”), Anadolu Faktoring AŞ (“Anadolu Faktoring”) and AnadoluBank Nederland NV (“AnadoluBank Nederland”).

The Bank has 91.90% ownership in Anadolu Yatırım, a brokerage and investment company, located in Istanbul. Anadolu Yatırım was established on 21 September 1998 and is mainly involved in trading of and investing in securities, stocks, treasury bills and government bonds provided from capital markets; the management of mutual funds and performing intermediary services.

The Bank acquired 99.99% of Anadolu Faktoring from Habaş Petrol Ürünleri Sanayi ve Ticaret AŞ (which is a related party) on 27 October 2008. Anadolu Faktoring was established in Istanbul on 20 March 2007 by obtaining the factoring license which is required to operate in the factoring sector.

The Bank has 100.00% ownership in AnadoluBank Nederland, located in Amsterdam – Netherlands. The Bank engages in banking operations in the Netherlands.

For the purposes of the consolidated financial statements, the Bank and its subsidiaries are referred to as “the Group”.

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2. Basis of preparation

2.1. Statement of compliance

The consolidated financial statements have been prepared in accordance with International Financial Reporting Standards (“IFRS”).

The Bank and its subsidiaries which are located in Turkey, maintain their books of account and prepare their statutory financial statements in Turkish Lira (“TL”) in accordance with the accounting practices as promulgated by the Banking Regulation and Supervision Agency (“BRSA”), Turkish Accounting Standards promulgated by the Public Oversight Accounting and Auditing Standards Authority, the Turkish Commercial Code, and the Turkish Tax Legislation. The Bank’s foreign subsidiary AnadoluBank Nederland maintains its books of account and prepare its statutory financial statements in EUR in accordance with the regulations of the country in which it operates.

The consolidated financial statements of the Group as at and for the year ended 31 December 2021 are authorised for issue by the management on 14 June 2022. The General Assembly and certain regulatory bodies have the power to amend the statutory financial statements after issue.

The amendments to IAS / IFRS effective from 1 January 2021 do not have any significant effect on the Group's accounting policies, financial position and performance except IFRS 16 - Leases (“IFRS 16”). The amendments to IAS and IFRS that were issued but not yet effective as of the date of finalization of the financial statements will have no material effect on the Group's accounting policies, financial position and performance.

2.2. Basis of measurement

The consolidated financial statements are prepared on the historical cost basis as adjusted for the effects of inflation that lasted until 31 December 2005, except that the following assets and liabilities are stated at their fair values: derivative financial assets and liabilities held for trading purposes, financial assets at fair value through profit or loss (“FVTPL”), financial assets at fair value through other comprehensive income (“FVOCI”), loans and receivables at FVTPL, and real estates.

2.3. Functional currency and presentation currency

These consolidated financial statements are presented in TL, which is the Bank’s functional currency. Except as indicated, the financial information presented in TL has been rounded to the nearest thousand.

2.4. Accounting in hyperinflationary countries

Financial statements of the Turkish entities have been restated for the changes in the general purchasing power of the Turkish Lira based on IAS 29 – *Financial Reporting in Hyperinflationary Economies* as at 31 December 2005. IAS 29 requires that financial statements prepared in the currency of a hyperinflationary economy be stated in terms of the measuring unit current at the reporting date, and that corresponding figures for previous years be restated in the same terms. One characteristic that necessitates the application of IAS 29 is a cumulative three-year inflation rate approaching or exceeding 100%. The cumulative three-year inflation rate in Turkey was 35.61% as at 31 December 2005, based on the Turkish nation-wide wholesale price indices announced by the Turkish Statistical Institute (“TURKSTAT”). This, together with the sustained positive trend in quantitative factors, such as the stabilization in capital and money markets, decrease in interest rates and the appreciation of TL against the USD and other hard currencies have been taken into consideration to categorize Turkey as a non-hyperinflationary economy under IAS 29 effective from 1 January 2006.

According to the announcement made by Public Oversight Accounting and Auditing Standards Authority on 20 January 2022, it has been stated that businesses applying IFRS do not need to make any adjustments in their financial statements for 2021 within the scope of IAS 29 Financial Reporting in High Inflation Economies.

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2. Basis of preparation *(continued)*

2.5. Use of estimates and judgments

The preparation of the consolidated financial statements requires management to make judgments, 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 recognized in the period in which the estimate is revised and in any future periods affected.

In particular, information about significant areas at estimation uncertainty and critical judgment in applying accounting policies that have the most significant effect on the amount recognized in the financial statements are described in the following notes:

- Note 8 – Derivative financial assets and liabilities held for trading purpose
- Note 10 – Loans and receivables
- Note 19 – Other liabilities and provisions
- Note 20 – Income taxes
- Note 28 – Financial risk management

2.6. Changes in accounting policies

Application of new and revised international financial reporting standards (ifrss)

New and Revised International Financial Reporting Standards

a) New and revised IFRSs that are effective for the current year

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

The amendments in Interest Rate Benchmark Reform — Phase 2 (Amendments to IFRS 9, IAS 39, IFRS 7, IFRS 4 and IFRS 16) introduce a practical expedient for modifications required by the reform, clarify that hedge accounting is not discontinued solely because of the IBOR reform, and introduce disclosures that allow users to understand the nature and extent of risks arising from the IBOR reform to which the entity is exposed to and how the entity manages those risks as well as the entity’s progress in transitioning from IBORs to alternative benchmark rates, and how the entity is managing this transition.

The amendments to IFRS 9, IAS 39, IFRS 7, IFRS 4 and IFRS 16 are all effective for annual periods beginning on or after 1 January 2021. Early application is permitted.

The Group assessed that the adoption of this amendment does not have any effect on the Group’s consolidated financial statements.

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2.6. Changes in accounting policies

Application of new and revised international financial reporting standards (ifrss)

New and Revised International Financial Reporting Standards

b) New and revised IFRSs in issue but not yet effective

The Group has not yet adopted the following standards and amendments and interpretations to the existing standards:

IFRS 17	<i>Insurance Contracts</i>
Amendments to IAS 1	<i>Classification of Liabilities as Current or Non-Current</i>
Amendments to IFRS 3	<i>Reference to the Conceptual Framework</i>
Amendments to IAS 16	<i>Property, Plant and Equipment – Proceeds before Intended Use</i>
Amendments to IAS 37	<i>Onerous Contracts – Cost of Fulfilling a Contract</i>
Annual Improvements to IFRS Standards 2018-2020	<i>Amendments to IFRS 1, IFRS 9 and IAS 41</i>
Amendments to IFRS 4	<i>Extension of the Temporary Exemption from Applying IFRS 9</i>
Amendments to IFRS 16	<i>COVID-19 Related Rent Concessions beyond 30 June 2021</i>
Amendments to IAS 1	<i>Disclosure of Accounting Policies</i>
Amendments to IAS 8	<i>Definition of Accounting Estimates</i>
Amendments to IAS 12	<i>Deferred Tax related to Assets and Liabilities arising from a Single Transaction</i>
Amendments to IFRS 17	<i>Initial Application of IFRS 17 and IFRS 9 — Comparative Information</i>

IFRS 17 Insurance Contracts

IFRS 17 requires insurance liabilities to be measured at a current fulfillment value and provides a more uniform measurement and presentation approach for all insurance contracts. These requirements are designed to achieve the goal of a consistent, principle-based accounting for insurance contracts. IFRS 17 supersedes IFRS 4 Insurance Contracts as of 1 January 2023.

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

The amendments aim to promote consistency in applying the requirements by helping companies determine whether, in the statement of financial position, debt and other liabilities with an uncertain settlement date should be classified as current (due or potentially due to be settled within one year) or non-current.

Amendment defers the effective date by one year. Amendments to IAS 1 are effective for annual reporting periods beginning on or after 1 January 2023 and earlier application is permitted.

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2.6. Changes in accounting policies

Application of new and revised international financial reporting standards (ifrss)

New and Revised International Financial Reporting Standards

b) New and revised IFRSs in issue but not yet effective

Amendments to IFRS 3 Reference to the Conceptual Framework

The amendments update an outdated reference to the Conceptual Framework in IFRS 3 without significantly changing the requirements in the standard.

The amendments are effective for annual periods beginning on or after 1 January 2022. Early application is permitted if an entity also applies all other updated references (published together with the updated *Conceptual Framework*) at the same time or earlier.

Amendments to IAS 16 Proceeds before Intended Use

The amendments prohibit deducting from the cost of an item of property, plant and equipment any proceeds from selling 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 the cost of producing those items, in profit or loss.

The amendments are effective for annual periods beginning on or after 1 January 2022. Early application is permitted.

Amendments to IAS 37 Cost of Fulfilling a Contract

The amendments specify that the ‘cost of fulfilling’ a contract comprises the ‘costs that relate directly to the contract’. Costs that relate directly to a contract can either be incremental costs of fulfilling that contract (examples would be direct labour, materials) or an allocation of other costs that relate directly to fulfilling contracts.

The amendments are effective for annual periods beginning on or after 1 January 2022. Early application is permitted.

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2.6. Changes in accounting policies

Application of new and revised international financial reporting standards (ifrss)

New and Revised International Financial Reporting Standards (cont’d)

b) New and revised IFRSs in issue but not yet effective (cont’d)

Annual Improvements to IFRS Standards 2018-2020

Amendments to IFRS 1 First time adoption of International Financial Reporting Standards

The amendment permits a subsidiary that applies paragraph D16(a) of IFRS 1 to measure cumulative translation differences using the amounts reported by its parent, based on the parent’s date of transition to IFRSs.

Amendments to IFRS 9 Financial Instruments

The amendment clarifies which fees an entity includes in assessing whether to derecognize a financial liability. An entity includes only fees paid or received between the entity (the borrower) and the lender, including fees paid or received by either the entity or the lender on the other’s behalf.

Amendments to IAS 41 Agriculture

The amendment removes the requirement in paragraph 22 of IAS 41 for entities to exclude taxation cash flows when measuring the fair value of a biological asset using a present value technique. This will ensure consistency with the requirements in IFRS 13.

The amendments to IFRS 1, IFRS 9 and IAS 41 are all effective for annual periods beginning on or after 1 January 2022. Early application is permitted.

Amendments to IFRS 4 Extension of the Temporary Exemption from Applying IFRS 9

The amendment changes the fixed expiry date for the temporary exemption in IFRS 4 Insurance Contracts from applying IFRS 9 Financial Instruments, so that entities would be required to apply IFRS 9 for annual periods beginning on or after 1 January 2023.

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2.6. Changes in accounting policies

Application of new and revised international financial reporting standards (ifrss)

New and Revised International Financial Reporting Standards (cont’d)

c) New and revised IFRSs in issue but not yet effective (cont’d)

Amendments to IFRS 16 COVID-19 Related Rent Concessions beyond 30 June 2021

The International Auditing and Assurance Standards Board (“IAASB”) has published *COVID-19 Related Rent Concessions beyond 30 June 2021 (Amendment to IFRS 16)* that extends, by one year, the June 2020 amendment that provides lessees with an exemption from assessing whether a COVID-19 related rent concession is a lease modification.

On issuance, the practical expedient was limited to rent concessions for which any reduction in lease payments affects only payments originally due on or before 30 June 2021. Since lessors continue to grant COVID-19 related rent concessions to lessees and since the effects of the COVID-19 pandemic are ongoing and significant, the POA decided to extend the time period over which the practical expedient is available for use.

The new amendment is effective for lessees for annual reporting periods beginning on or after 1 April 2021. Earlier application is permitted.

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2.6. Changes in accounting policies

Application of new and revised international financial reporting standards (ifrss)

New and Revised International Financial Reporting Standards (cont’d)

b) New and revised IFRSs in issue but not yet effective (cont’d)

Amendments to IFRS 16 COVID-19 Related Rent Concessions beyond 30 June 2021 (cont’d)

The Group has applied the practical expedient to all rent concessions that have met the related criteria included in the amendment.

Amendments to IAS 1 Disclosure of Accounting Policies

The amendments require that an entity discloses its material accounting policies, instead of its significant accounting policies.

Amendments to IAS 1 are effective for annual reporting periods beginning on or after 1 January 2023 and earlier application is permitted.

Amendments to IAS 8 Definition of Accounting Estimates

With this amendment, the definition of “a change in accounting estimates” has been replaced with the definition of “an accounting estimate”, sample and explanatory paragraphs regarding estimates have been added, and the differences between application of an estimate prospectively and correction of errors retrospectively have been clarified.

Amendments to IAS 8 are effective for annual reporting periods beginning on or after 1 January 2023 and earlier application is permitted.

Amendments to IAS 12 Deferred Tax related to Assets and Liabilities arising from a Single Transaction

The amendments clarify that the initial recognition exemption does not apply to transactions in which equal amounts of deductible and taxable temporary differences arise on initial recognition.

Amendments to IAS 12 are effective for annual reporting periods beginning on or after 1 January 2023 and earlier application is permitted.

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2.6. Changes in accounting policies

Application of new and revised international financial reporting standards (ifrss)

b) New and revised IFRSs in issue but not yet effective (cont’d)

Amendments to IFRS 17 Initial Application of IFRS 17 and IFRS 9 — Comparative Information

The amendment permits entities that first apply IFRS 17 and IFRS 9 at the same time to present comparative information about a financial asset as if the classification and measurement requirements of IFRS 9 had been applied to that financial asset before.

The amendments are applied when IFRS 17 is first applied.

The Group evaluates the effects of these standards, amendments and improvements on the consolidated financial statements.

3. Significant accounting policies

Except the changes disclosed in Note 2.6, the accounting policies set out below have been applied consistently to all periods presented in these consolidated financial statements.

3.1. Basis of consolidation

(i) Subsidiaries

Subsidiaries are investees controlled by the Group. The Group ‘controls’ an investee if it is exposed to, 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. The financial statements of subsidiaries are included in the consolidated financial statements from the date on which control commences until the date when control ceases.

(ii) Non-controlling interests

Non-controlling interests (“NCI”) are measured at their proportionate share of the acquiree’s identifiable net assets at the acquisition date. Changes in the Group’s interest in a subsidiary that do not result in a loss of control are accounted for as equity transactions.

(iii) Loss of control

When the Group loses control over a subsidiary, it derecognises the assets and liabilities of the subsidiary, and any related NCI and other components of equity. Any resulting gain or loss is recognized in profit or loss. Any interest retained in the former subsidiary is measured at fair value when control is lost.

(iv) Transactions eliminated on consolidation

Intra-group balances and transactions, and any unrealised income and expenses (except for foreign currency transaction gains or losses) arising from intra-group transactions, are eliminated in preparing the consolidated financial statements. Unrealised losses are eliminated in the same way as unrealised gains, but only to the extent that there is no evidence of impairment.

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3. Significant accounting policies

3.2. Foreign currency

i) Foreign currency transactions

Transactions are recorded in TL, which represents the Group’s functional currency except for Anadolubank Nederland of which they are recorded in Euro. Transactions denominated in foreign currencies are recorded at the exchange rates ruling at the dates of the transactions. Monetary assets and liabilities denominated in foreign currencies on the reporting date are retranslated to the functional currency at the exchange rate on that date. Foreign currency differences arising on retranslation are recognised in the statement of profit or loss and other comprehensive income. Non-monetary assets and liabilities that are measured in terms of historical cost in a foreign currency are translated using the exchange rate at the date of the transaction.

The official TL exchange rates used by the Group for foreign currency translation are as follows:

	EUR / TL	USD / TL
31 December 2021	15.0867	13.3290
31 December 2020	9.1164	7.4194

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3. Significant accounting policies *(continued)*

3.2. Foreign currency *(continued)*

ii) Foreign operations

The assets and liabilities of foreign subsidiaries are translated into presentation currency of the Group at the rate of exchange ruling at the reporting date. The statement of profit or loss of foreign subsidiaries is translated at the weighted average exchange rates after the acquisition date. On consolidation exchange differences arising from the translation of the net investment in foreign entity are included in equity as currency translation reserve.

Foreign currency differences, arising from foreign subsidiaries, are recognised in other comprehensive income (“OCI”), under the foreign currency translation reserve. When a foreign operation is disposed of, in part or in full, the relevant amount in the foreign currency translation reserve is transferred to profit or loss, as part of the profit or loss on disposal.

3.3 Interest

Interest income and expense are recognised in profit or loss using the effective interest method. The effective interest rate is the rate that exactly discounts the estimated future cash payments and receipts through the expected life of the financial asset or liability (or, where appropriate, a shorter period) to the carrying amount of the financial asset or liability.

When calculating the effective interest rate, the Group estimates cash flows considering all contractual terms of the financial instrument (for example, prepayment, call and similar options) but does not consider future credit losses. The calculation includes all fees and points paid or received between parties to the contract that are an integral part of the effective interest rate, transaction costs, and all other premiums or discounts.

Interest income and expense presented in the statement of profit or loss and OCI include:

- interest on financial assets and financial liabilities measured at amortised cost calculated on an effective interest basis;
- interest for financial assets at FVOCI calculated on an effective interest basis,

3.4. Fees and commission

Fees and commission income and expenses that are integral to the effective rate on a financial asset or liability are included in the measurement of the effective rate.

Other fees and commission income, including account servicing fees, investment management fees, sales commission, placement fees and syndication fees are recognised as the related services are provided. When a loan commitment is not expected to result in the draw-down of a loan, loan commitment fees are recognised on a straight-line basis over the commitment period.

Other fees and commission expenses relate mainly to transaction and service fees, which are expensed as the services are received.

3.5. Net trading income

Net trading income comprises gains less loss related to trading assets and liabilities, and includes all realised and unrealised fair value changes, except for the unrealised gains of financial assets at FVOCI.

3.6. Dividends

Dividend income is recognised when the right to receive the income is established.

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3. Significant accounting policies *(continued)*

3.7. Income tax expense

Current tax assets and liabilities for the current and prior periods are measured at the amount expected to be recovered from or paid to the tax authorities. The tax rates and tax laws used to compute the amount are those that are enacted or substantially enacted by the balance sheet date.

According to the Article 32 of the Corporate Tax Law No. 5520, announced in the Official Gazette dated 21 June 2006, the corporate tax rate is 20% in Turkey. However, the corporate income tax rate has been applied as 22% for 3 the years between 2018-2020 regarding to the "Law on Amendment of Certain Tax Laws and Some Other Laws" numbered 7061 and published in the Official Gazette on 5 December 2017. With Article 11 of the Law No. 7316 on the Procedure for Collection of Public Claims and Amending Certain Laws, which was published in the Official Gazette dated 22 April 2021 and numbered 31462, and with the Provisional Article 13 added to the Corporate Tax Law No. 5520, the Corporate Tax rate applied as 25% for the corporate earnings of the 2021 taxation period and will be applied 23% for the corporate earnings of the 2022 taxation period.

This rate is applied to tax base which is calculated by adding certain non-deductible expenses for tax purposes and deducting certain exemptions (like dividend income) and other deductions on accounting income. If there is no dividend distribution, no further tax charges are made.

Income tax expense comprises current and deferred tax. Current tax and deferred tax are recognised in profit or loss except to the extent that they relate to items recognised directly in equity or in other comprehensive income.

Current tax assets and liabilities for the current and prior periods are measured at the amount expected to be recovered or paid to the taxation authorities. The tax rates and tax laws used to compute the amount are those that are enacted or substantively enacted by the reporting date.

Deferred tax assets are recognised for all deductible temporary differences, carry-forward of unused tax losses, to the extent that it is probable that taxable profit will be available against which the deductible temporary differences, carry-forward of unused tax losses can be utilised.

Deferred tax is not recognised for:

- temporary differences on the initial recognition of assets and liabilities in a transaction that is not a business combination and that affects neither accounting nor taxable profit or loss;
- temporary differences related to investments in subsidiaries to the extent that it is probable that they will not reverse in the foreseeable future; and
- taxable temporary differences arising on the initial recognition of goodwill.

Deferred tax assets and liabilities are measured at the tax rates that are expected to apply to the period when the asset is realised or the liability is settled, based on tax rates and tax laws that have been enacted or substantively enacted at the reporting date.

A deferred tax asset is recognised only to the extent that it is probable that future taxable profits will be available against which the asset can be utilised. Deferred tax assets are reviewed at each reporting date and are reduced to the extent that it is no longer probable that the related tax benefit will be realised.

Deferred tax assets and deferred tax liabilities are offset, if a legally enforceable right exists to set off current tax assets against current tax liabilities, and deferred taxes relate to the same taxable entity and the same taxation authority.

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3. Significant accounting policies *(continued)*

3.7. Income tax expense *(continued)*

Effective between 1 January 2017 and 4 December 2017, earnings generated through transfer of real estates, equity shares, founders’ shares, redeemed shares and pre-emption rights owned by the companies being under legal proceedings due to their debts to the banks or liable to the Savings Deposit Insurance Fund or by their guarantors and mortgage providers and earnings generated by the banks through sale of such assets are exempt from corporate tax at the rate of 75%.

Effective between 1 January 2017 and 4 December 2017, 75% of earnings generated through sale of real estates, equity shares, founders’ shares, redeemed shares and pre-emption rights held as asset at least for two years by the institutions are exempt from the corporate tax with the conditions that such earnings shall be held in a special reserve account under equity until the end of five years following the year of sale and shall be collected as cash until the end of the following two fiscal years.

On the other hand, based on the legislation of the Amendment on Certain Tax Laws and Other Laws no. 7061, effective from 5 December 2017, the aforementioned exemption rate is set as 50% for the earnings generated through sale of real estates and 75% for the earnings generated through sale of other items.

3.8. Financial assets and liabilities

IFRS 9 sets out requirements for recognising and measuring financial assets, financial liabilities and some contracts to buy or sell non-financial items. This standard replaced IAS 39 Financial Instruments “Recognition and Measurement”.

Recognition

The Group initially recognises loans, factoring receivables and advances, deposits and funds borrowed on the date that they are originated. Regular way purchases and sales of financial assets are recognised on the trade date on which the Group commits to purchase or sell the asset. All other financial assets and liabilities (including assets and liabilities designated at fair value profit or loss) are initially recognised on the trade date at which the Group becomes a party to the contractual provisions of the instrument.

A financial asset or financial liability is measured initially at fair value plus, for an item not at FVTPL, transaction costs that are directly attributable to its acquisition or issue.

i. Classification and measurement of financial assets and financial liabilities

Under IFRS 9, on initial recognition, a financial asset is classified as measured at: amortised cost; FVOCI – debt investment; FVOCI – equity investment; or FVTPL. The classification of financial assets under IFRS 9 is generally based on the business model in which a financial asset is managed and its contractual cash flow characteristics. Derivatives embedded in contracts where the host is a financial asset in the scope of the standard are never separated. Instead, the hybrid financial instrument as a whole is assessed for classification.

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3. Significant accounting policies *(continued)*

3.8. Financial assets and liabilities *(continued)*

i. Classification and measurement of financial assets and financial liabilities *(continued)*

A financial asset is measured at amortised cost if it meets both of the following conditions and is not designated as at FVTPL:

- it is held within a business model whose objective is to hold assets to collect contractual cash flows; and

- its contractual terms give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

A debt instrument is measured at FVOCI if it meets both of the following conditions and is not designated as at FVTPL:

- it is held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets; and

- its contractual terms give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

On initial recognition of an equity investment that is not held for trading, the Group may irrevocably elect to present subsequent changes in the investment’s fair value in OCI. This election is made on an investment-by-investment basis.

All financial assets not classified as measured at amortised cost or FVOCI as described above are measured at FVTPL. On initial recognition, the Group may irrevocably designate a financial asset that otherwise meets the requirements to be measured at amortised cost or at FVOCI as at FVTPL if doing so eliminates or significantly reduces an accounting mismatch that would otherwise arise.

A financial asset (unless it is a trade receivable without a significant financing component that is initially measured at the transaction price) is initially measured at fair value plus, for an item not at FVTPL, transaction costs that are directly attributable to its acquisition.

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3. Significant accounting policies *(continued)*

3.8. Financial assets and liabilities *(continued)*

i. Classification and measurement of financial assets and financial liabilities *(continued)*

The following accounting policies apply to the subsequent measurement of financial assets.

Financial assets at FVTPL	These assets are subsequently measured at fair value. Net gains and losses, including any interest or dividend income, are recognised in profit or loss.
Financial assets at amortised cost	These assets are subsequently measured at amortised cost using the effective interest method. The amortised cost is reduced by impairment losses. Interest income, foreign exchange gains and losses and impairment are recognised in profit or loss. Any gain or loss on derecognition is recognized in profit or loss.
Debt investments at FVOCI	These assets are subsequently measured at fair value. Interest income calculated using the effective interest method, foreign exchange gains and losses and impairment are recognised in profit or loss. Other net gains and losses are recognised in OCI. On derecognition, gains and losses accumulated in OCI are reclassified to profit or loss.
Equity investments at FVOCI	These assets are subsequently measured at fair value. Dividends are recognised as income in profit or loss unless the dividend clearly represents a recovery of part of the cost of the investment. Other net gains and losses are recognised in OCI and are never reclassified to profit or loss.

Financial assets:

The Group classifies its financial assets into one of the following categories:

Financial assets measured at amortised cost

Financial assets at FVOCI; and

At fair value through profit or loss, and within this category as:

- Financial assets at FVTPL.

Financial liabilities:

The Group classifies its financial liabilities as measured at amortised cost.

Derecognition

The Group derecognises a financial asset when the contractual rights to the cash flows from the asset expire, or it transfers the rights to receive the contractual cash flows on the financial asset in a transaction in which substantially all the risks and rewards of ownership of the financial asset are transferred.

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3. Significant accounting policies *(continued)*

3.8. Financial assets and liabilities *(continued)*

Derecognition (continued)

The Group does not have any assets where the Group has transferred its rights to receive cash flows from an asset and has neither transferred nor retained substantially all the risks and rewards of the asset nor transferred control of the asset that is recognised to the extent of the Group’s continuing involvement in the asset.

The Group derecognises a financial liability when its contractual obligations are discharged or cancelled or expire.

When an existing liability is replaced by another from the same lender on substantially different terms, or the terms of an existing liability are substantially modified, such an exchange or modification is treated as a derecognition of the original liability and the recognition of a new liability, and the difference in the respective carrying amounts is recognised in the consolidated statement of profit or loss.

The Group enters into transactions whereby it transfers assets recognised on its statement of financial position, but retains either all risks or rewards of the transferred assets or a portion of them. If all or substantially all risks and rewards are retained, then the transferred assets are not derecognised from the financial position. Transfers of assets with retention of all or substantially all risks and rewards include, for example, securities lending and repurchase transactions.

Offsetting

Financial assets and liabilities are set off and the net amount presented in the statement of financial position when, and only when, the Group has a legal right to set off the recognised amounts and it intends either to settle on a net basis or to realise the asset and settle the liability simultaneously.

Income and expenses are presented on a net basis only when permitted by the accounting standards, or for gains and losses arising from a group of similar transactions such as in the Group’s trading activity.

Amortised cost measurement

The amortised cost of a financial asset or liability is the amount at which the financial asset or liability is measured at initial recognition, minus principal repayments, plus or minus the cumulative amortisation using the effective rate method of any difference between the initial amount recognised and the maturity amount, minus any reduction for impairment.

Derivative financial instruments

The Group enters into transactions with derivative instruments including forwards, swaps, currency options and interest rate cap/floor agreements in the foreign exchange and capital markets. Most of these derivative transactions are considered as effective economic hedges under the Group’s risk management policies; however, since they do not qualify for hedge accounting under the specific provisions of International Accounting Standard 39 – Financial instruments: Recognition and measurement (“IAS 39”) or IFRS 9, because IFRS 9 permits to defer application of IFRS 9 hedge accounting and continue to apply hedge accounting in accordance with IAS 39 as a policy choice, they are treated as derivatives held for trading.

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 on derivatives that do not qualify for hedge accounting are recognised in profit or loss.

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3. Significant accounting policies *(continued)*

3.8. Financial assets and liabilities *(continued)*

Derivative financial instruments (continued)

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.

Identification and measurement of impairment

At each reporting date, the Group assesses whether there is objective evidence that financial assets not carried at fair value through profit or loss are impaired. Financial assets are impaired when objective evidence demonstrates that a loss event has occurred after the initial recognition of the asset, and that the loss event has an impact on the future cash flows on the asset that can be estimated reliably.

Loans and receivables are presented net of specific and portfolio basis allowances for uncollectibility. Specific allowances are made against the carrying amount of loans and receivables that are identified as being impaired based on regular reviews of outstanding balances to reduce these loans and receivable to their recoverable amounts. In assessing the recoverable amounts of the loans and receivables, the estimated future cash flows are discounted to their present value. Portfolio basis allowances are maintained to reduce the carrying amount of portfolios of similar loans and receivables to their estimated recoverable amounts at the reporting date. In order to determine allowance rate for portfolio basis, the Group uses historical allowance rates based on its own statistical data.

Objective evidence that financial assets are impaired includes observable data that comes to the attention of the Group about the following loss events:

- significant financial difficulty of the issuer or obligor;
- a breach of contract, such as a default or delinquency in interest rate, penalty or principal payments;
- the Group granting to the borrower, for economic or legal reasons relating to the borrower’s financial difficulty, a concession that the lender would not otherwise consider;
- it becomes probable that the borrower will enter bankruptcy or other financial reorganisation;
- the disappearance of an active market for that financial asset because of financial difficulties; or
- observable data indicating that there is a measurable decrease in the estimated future cash flows from a group of financial assets since the initial recognition of those assets, although the decrease cannot yet be identified with the individual financial assets in the Group, including:
 - adverse changes in the payment status of borrowers; or
 - national or local economic conditions that correlate with defaults on the assets in the Bank.

The Group first assesses whether objective evidence of impairment exists individually for financial assets that are individually significant, and individually or collectively for financial assets that are not individually significant. If it is determined that no objective evidence of impairment exists for an individually assessed financial asset, whether significant or not, the asset is included in a group of financial assets with similar credit risk characteristics and that group of financial assets is collectively assessed for impairment. Assets that are individually assessed for impairment and for which an impairment loss is or continues to be recognised are not included in a collective assessment of impairment.

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3. Significant accounting policies *(continued)*

3.8. Financial assets and liabilities *(continued)*

Identification and measurement of impairment (continued)

If there is objective evidence that an impairment loss on loans and receivables carried at amortised cost has been incurred, the amount of the loss is measured as the difference between the assets' carrying amount and estimated recoverable amount. The carrying amount of the asset is reduced through use of an allowance account. Losses are recognised in profit or loss and reflected in an allowance account against loans and receivables.

When a subsequent event causes the amount of impairment loss to decrease, the impairment loss is reversed through profit or loss.

Impairment losses on financial assets at FVOCI are recognised by transferring the difference between the amortised acquisition cost and current fair value out of equity to profit or loss. Changes in impairment provisions attributable to time value are reflected as a component of interest income. No impairment loss is recognised on equity investments.

When a subsequent event causes the amount of impairment loss on a debt security classified under financial assets at FVOCI to decrease, the impairment loss is reversed through profit or loss.

A write off is made when all or part of a loan is deemed uncollectible or in the case of debt forgiveness. Such loans are written off after all the necessary legal and regulatory procedures have been completed and the amount of the loss has been determined. Write offs are charged against previously established allowances and reduce the principal amount of a loan. Subsequent recoveries of amounts written off are included in profit or loss.

IFRS 9 replaces the “incurred loss” model in IAS 39 with an expected credit loss (“ECL”) model. The new impairment model applies to financial assets measured at amortised cost, contract assets and debt investments at FVOCI, but not to investments in equity instruments. Under IFRS 9, credit losses are recognised earlier than under IAS 39.

The financial assets at amortised cost consist of cash and cash equivalents, loans and investment securities.

Under IFRS 9, loss allowances are measured on either of the following bases:

-12-month ECLs: these are ECLs that result from possible default events within the 12 months after the reporting date; and

-lifetime ECLs: these are ECLs that result from all possible default events over the expected life of a financial instrument.

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3. Significant accounting policies *(continued)*

3.8. Financial assets and liabilities *(continued)*

Expected credit loss calculation:

The Group considers macroeconomic adjusted forward looking PD, LGD and EAD components in the estimation of expected credit loss from a financial asset. Expected credit loss is calculated under three different scenarios with different macroeconomic expectations and final outcome is a weighted average of the calculations.

Expected credit loss is calculated through three stages as described below;

Stage 1: 12 month expected credit loss is calculated for financial assets in stage 1. 12 month expected credit loss represents the expected credit loss that results from default events on a financial instrument that are possible within the 12 months after the reporting date.

Stage 2: There is a significant increase in credit risk for a financial asset in stage 2 since their origination and lifetime expected credit loss is calculated for stage 2.

Stage 3: Financial assets considered as impaired are in stage 3. Lifetime expected credit loss is calculated for stage 3.

Probability of default, exposure at default and loss given default models:

Internal Probability of Default (“PD”) models consider financial standing and demographical, internal-external behavioral data of customers. The Bank adopts different PD models for customers with different characteristics. Loss Given Default (“LGD”) models are segment level models and represent time value of money by calculating present value of all future cash flows by using the effective interest rate. The Bank uses future cash flows and behavioral data in estimating exposure at default (“EAD”).

Transfer logic:

The Bank uses quantitative and qualitative methods in identifying significant increase in credit risk. As a quantitative analysis, the Bank measures the significant credit deterioration by comparing the risk of default at inception (initial rating) and the reporting date. The Bank uses watch-list, memzuc and customer days past due information as qualitative criteria and classifies loans in stage 2. The change in the loan payment plan (restructuring) due to financial difficulty or concession is also considered as stage 2.

Individual assessment

For financial assets above a threshold in stage 3, the Bank conducts individual assessments in calculation of expected credit loss. The Bank has proper documentation of the calculations and the methodology for individual assessment. Calculations are performed by discounting the expected cash flows for the individual financial instrument to its present value using the effective interest rate. Future cash flows are determined based on two scenarios: going concern and gone concern scenarios. The choice of these scenarios depends on whether the customer is still operating and has operating cash flows that may be used to repay the debt, or whether the customer is not operating anymore and has collateral that may be used to pay the debt.

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3. Significant accounting policies *(continued)*

3.8. Financial assets and liabilities *(continued)*

Repurchase and resale transactions

The Group enters into sales of securities under agreements to repurchase such securities. Such securities, which have been sold subject to a repurchase agreement (“repos”), continue to be recognised in the statement of financial position and are measured in accordance with the accounting policy of the security portfolio which they are part of securities sold subject to repos are reclassified in the consolidated financial statements as loaned securities when the transferee has the right by contract or custom to sell or repledge the collateral. The counterparty liability for amounts received under these agreements is included in other money market deposits. The difference between sale and repurchase price is treated as interest expense and accrued over the life of the repurchase agreements using effective interest method.

Securities purchased with a corresponding commitment to resell at a specified future date (“reverse repos”) are not recognised in the statement of financial position, as the Group does not obtain control over the assets. Amounts paid under these agreements are included in other money market placements. The difference between purchase and resale price is treated as interest income and accrued over the life of the reverse repurchase agreement using effective interest method.

3.9. Cash and cash equivalents

Cash and cash equivalents include notes and coins on hand, unrestricted balances held with central banks and highly liquid financial assets with original maturities of less than three months, which are subject to insignificant risk of changes in their fair value, and are used by the Group in the management of its short-term commitments.

Cash and cash equivalents are carried at amortised cost in the statement of financial position.

3.10. Trading assets and liabilities

Trading assets and liabilities are those assets and liabilities that the Group acquires or incurs principally for the purpose of selling or repurchasing in the near term, or holds as part of a portfolio that is managed together for short-term profit or position taking.

Trading assets and liabilities are initially recognised and subsequently measured at fair value in the statement of financial position, with transaction costs recognised in profit or loss. Trading assets and liabilities are not reclassified subsequent to their initial recognition, except that non-derivative trading assets, other than those designated at fair value through profit or loss on initial recognition, may be reclassified out of the fair value through profit or loss – i.e. trading – category if they are no longer held for the purpose of being sold or repurchased in the near term and the following conditions are met.

- If the financial asset would have met the definition of loans and receivables (if the financial asset had not been required to be classified as financial asset at fair value through profit or loss at initial recognition), then it may be reclassified if the Group has the intention and ability to hold the financial asset for the foreseeable future or until maturity.
- If the financial asset would not have met the definition of loans and receivables, then it may be reclassified out of the trading category only in rare circumstances.

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3. Significant accounting policies (continued)

3.11. Loans and receivables

Loans and receivables are financial assets with fixed or determinable payments and fixed maturities that are not quoted in active market. They are not entered into with the intention of immediate or short-term resale and are not classified as “Financial assets held for trading”, designated as “Financial assets designated at fair value through other comprehensive income” or “Financial assets designated at fair value through profit or loss”. After initial measurement, loans, receivables and advances are subsequently measured at amortised cost using the effective interest rate method, less allowance for impairment. Certain loans are subsequently designated irrevocably as financial assets at FVTPL as permitted by IFRS 9. The Bank classifies certain loans at their origination dates, as financial assets at fair value through profit or loss in compliance with IFRS 9. Financial assets at fair value through profit or loss are initially recorded at cost and measured at fair value in subsequent periods. The amortisation is included in “Interest income” in profit or loss. The losses arising from impairment are recognised in profit or loss in “Net impairment loss on financial assets”.

“Loans and receivables” captions in the statement of financial position include:

- loans and receivables measured at amortised cost: they are initially measured at fair value plus incremental direct transaction costs, and subsequently at their amortised cost using the effective interest method;
- loans and receivables mandatorily measured at FVTPL or designated as at FVTPL: these are measured at fair value with face value changes recognised immediately in profit or loss; and
- finance lease receivables

3.12. Investment securities

Financial assets measured at amortised cost

Financial assets measured at amortised cost are financial assets with fixed maturities that the Group has the intent and ability to hold until maturity. Financial assets measured at amortised cost are initially recognised at cost. Financial assets measured at amortised cost are accounted for by using a discounting method based on internal rate of return applied on the net investment amounts after the deduction of provision for impairments. Interest earned on financial assets measured at amortised cost are recognised as interest income and reflected in the consolidated statement of profit or loss.

Financial assets at FVOCI

Financial assets at FVOCI are non-derivative investments that are not designated as another category of financial assets. If a quoted market price is not available, fair value of an instrument is estimated using the available market information and the appropriate valuation methodologies. All other financial assets at FVOCI are carried at fair value. Unrealised gains and losses are recognised directly in equity in the “Fair value reserves”.

Interest income is recognised in profit or loss using the effective interest method. Dividend income is recognised in profit or loss when the Group becomes entitled to the dividend. Foreign exchange gains or losses on debt security investments at FVOCI are recognised in the consolidated statement of profit or loss.

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3. Significant accounting policies (continued)

3.12. Investment securities (continued)

Financial assets at FVOCI (continued)

If a financial asset at FVOCI is impaired, an amount comprising the difference between its cost (net of any principal payment and amortisation) and its current fair value, less any impairment loss previously recognised in profit or loss, is transferred from other comprehensive income to profit or loss. Reversals in respect of equity instruments classified as at FVOCI are not recognised in profit or loss. Reversals of impairment losses on debt instruments are reversed through profit or loss; if the increase in fair value of the instrument can be objectively related to an event occurring after the impairment loss was recognised in profit or loss.

Other fair value changes are recognised directly in other comprehensive income until the investment is sold or impaired and the balance in other comprehensive income is recognised in profit or loss.

3.13. Property and equipment

Recognition and measurement

Items of property and equipment are measured at cost less accumulated depreciation and impairment losses.

Cost includes expenditures that are directly attributable to the acquisition of the asset. The cost of self-constructed assets includes the cost of materials and direct labour, any other costs directly attributable to bringing the asset to a working condition for its intended use, and the costs of dismantling and removing the items and restoring the site on which they are located.

As of 1 January 2017, changing the existing accounting policy, it has been decided to apply revaluation model for properties recorded under tangible and intangible assets instead of cost model in accordance with IAS 16 “Property, Plant and Equipment”.

Accordingly, for all real estates registered in the ledger, a valuation study was performed by independent expertise firms authorized by Capital Markets Board (“CMB”) and BRSA. Revaluations are performed in line with IFRS 13 “Fair Value Measurement Financial Reporting Standard”. Valuation method used by expertise firms is the market approach. As a result of the revaluation of the buildings, as of 31 December 2021, the change in the fair value of property and equipment which is recognized under equity was increased to TL 164,180 (31 December 2020: The amount is TL 94,023) before tax. As of 31 December 2021, if the buildings were accounted based on cost model instead of revaluation model, the net carrying value would be TL 123,775 (31 December 2020: TL 124,628).

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3. Significant accounting policies *(continued)*

3.13. Property and equipment *(continued)*

Subsequent costs

The cost of replacing part of an item of property or equipment is recognised in the carrying amount of the item if it is probable that the future economic benefits embodied within the part will flow to the Group and its cost can be measured reliably. The costs of the day-to-day servicing of property and equipment are recognised in profit or loss as incurred.

Depreciation

Depreciation is recognised in profit or loss on a straight-line basis over the estimated useful lives of each part of an item of property and equipment. Leased assets are depreciated over the shorter of the lease term and their useful lives. Land is not depreciated.

The estimated useful lives for the current and comparative periods are as follows:

	Years
Buildings and improvements	50
Machinery and equipment	5
Office equipment	5
Furniture, fixtures and vehicles	5
Leasehold improvements	4-10

Leasehold improvements are depreciated on a straight-line method over a period of time of their lease contract.

Depreciation methods, useful lives and residual values are reviewed at each reporting date and adjusted if appropriate.

3.14. Intangible assets

Software acquired by the Group is stated at cost less accumulated amortisation and accumulated impairment losses.

Subsequent expenditure on software assets is capitalised only when it increases the future economic benefits embodied in the specific asset to which it relates. All other expenditure is expensed as incurred.

Amortisation is recognised in profit or loss on a straight-line basis over the estimated useful life of the software, from the date that it is available for use. The estimate useful lives of software are three to five years.

Amortisation methods, useful lives and residual values are reserved at each reporting date and adjusted if appropriate.

3.15. Assets held for sale

Non-current assets, or disposal groups comprising assets and liabilities, are classified as held for sale if it is highly probable that they will be recovered primarily through sale rather than through continuing use. Such assets, or disposal groups, are generally measured at the lower of their carrying amount and fair value less costs to sell.

Impairment losses on initial classification as held for sale or held for distribution and subsequent gains and losses on remeasurement are recognised in profit or loss. Once classified as held for sale, intangible assets and property and equipment are no longer amortised or depreciated, and any equity-accounted investee is no longer equity accounted.

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3. Significant accounting policies (continued)

3.16. Impairment of non-financial assets

The carrying amounts of the Group’s non-financial assets, other than deferred tax assets, are reviewed at each reporting date to determine whether there is any indication of impairment. If any such indication exists then the asset’s recoverable amount is estimated.

An impairment loss is recognised if the carrying amount of an asset or its cash-generating unit exceeds its recoverable amount. A cash-generating unit is the smallest identifiable asset group that generates cash flows that largely are independent from other assets and groups. Impairment losses are recognised in statement of other comprehensive income. Impairment losses recognised in respect of cash-generating units are allocated first to reduce the carrying amount of any goodwill allocated to the units and then to reduce the carrying amount of the other assets in the unit (group of units) on a pro rata basis.

The recoverable amount of an asset or cash-generating unit is the greater of its value in use and its fair value less costs to sell. In assessing value in use, the estimated future cash flows are discounted to their present value using a pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset.

An impairment loss in respect of other assets, impairment losses recognised in prior periods is assessed at each reporting date for any indications that the loss has decreased or no longer exists. An impairment loss is reversed if there has been a change in the estimates used to determine the recoverable amount. An impairment loss is reversed only to the extent that the asset’s carrying amount does not exceed the carrying amount that would have been determined, net of depreciation or amortisation, if no impairment loss had been recognised.

3.17. Deposits and funds borrowed

Deposits are the Bank’s main source of debt funding. Deposits of the Bank comprised of the deposits from banks and customers.

Deposits and funds borrowed are initially measured at fair value minus incremental direct transaction costs, and subsequently measured at their amortised cost using the effective interest method.

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3. Significant accounting policies (continued)

3.18 Hedge accounting

IFRS 9 permits to defer application of IFRS 9 hedge accounting and continue to apply hedge accounting in accordance with IAS 39 as a policy choice. Accordingly, the Group continues to apply hedge accounting in accordance with IAS 39 in this context.

Policy applicable for all hedging relationships

On initial designation of the hedge, the Group formally documents the relationship between the hedging instrument(s) and hedged item(s), including the risk management objective and strategy in undertaking the hedge, together with the method that will be used to assess the effectiveness of the hedging relationship.

The Group makes an assessment, both on inception of the hedging relationship and on an ongoing basis, of whether the hedging instrument(s) is (are) expected to be highly effective in offsetting the changes in the fair value or cash flows of the respective hedged item(s) during the period for which the hedge is designated, and whether the actual results of each hedge are within a range of 80–125%.

i. Net investment hedges

When a derivative instrument or a non-derivative financial liability is designated as the hedging instrument in a hedge of a net investment in a foreign operation, the effective portion of changes in the fair value of a derivative or the foreign exchange gains and losses of a non-derivative is recognised in OCI and presented in the translation reserve within equity.

The effective portion of the change in fair value of the hedging instrument is computed with reference to the functional currency of the parent entity against whose functional currency the hedged risk is measured. Any ineffective portion of the changes in the fair value of the derivative or foreign exchange gains and losses on the non-derivative is recognised immediately in profit or loss. The amount recognised in OCI is fully or partially reclassified to profit or loss as a reclassification adjustment on disposal or partial disposal of the foreign operation, respectively.

ii. Cash flow hedge

The Group applies fair value hedge and cash flow hedge accounting. Hedging accounting is applied to prevent the fluctuations that may arise in the income statement in the short term as a result of the differences in the valuation methods of the assets and liabilities in the balance sheet that are subject to interest rate risk and derivative instruments. Some of the Group's fixed rate foreign currency securities and foreign currency loans are subject to fair value hedge accounting. The fair value risk of the related fixed rate financial assets is hedged with interest rate swaps. The Group also hedges floating rate foreign currency corporate deposits from cash flow risk with interest rate swaps. The assessment that derivative transactions used for hedging purposes can effectively offset changes in the fair value of the hedged item is measured regularly and the measurement results are documented. In cases where the hedge does not meet the hedge accounting requirements, hedge accounting is discontinued. If hedge accounting requirements are met, a) Changes in the fair value of the hedged item under fair value hedge accounting is recognized in profit or loss, b) Changes in the fair value of the hedging instrument under cash flow hedge accounting is recognized in other comprehensive income and the ineffective portion of the gain or loss on the hedging instrument is recognized in profit or loss.

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3. Significant accounting policies (continued)

3.19. Provisions

A provision is recognised if, as a result of a past event, the Group has a present legal or constructive obligation that can be estimated reliably, and it is probable that an outflow of economic benefits will be required to settle the obligation. Provisions are determined by discounting the expected future cash flows at a pre-tax rate that reflects current market assessments of the time value of money and, where appropriate, the risks specific to the liability.

A provision for restructuring is recognised when the Group has approved a detailed and formal restructuring plan, and the restructuring either has commenced or has been announced publicly. Future operating costs are not provided for.

A provision for onerous contracts is recognised when the expected benefits to be derived by the Group from a contract are lower than the unavoidable cost of meeting its obligations under the contract. The provision is measured at the present value of the lower of the expected cost of terminating the contract and the expected net cost of continuing with the contract. Before a provision is established, the Group recognises any impairment loss on the assets associated with that contract.

3.20. Employee benefits

Reserve for employee severance indemnity

Reserve for employee severance indemnity represents the present value of the estimated future probable obligation of the Group arising from the retirement of the employees and calculated in accordance with the Turkish Labour Law. Employment termination benefit is not a funded liability and there is no requirement to fund it. Employment termination benefit is calculated based on the estimation of the present value of the employee’s probable future liability arising from the retirement. IAS 19 “Employee Benefits” requires actuarial valuation methods to be developed to estimate the bank’s obligation under defined employee plans. IAS 19 has been revised effective from the annual period beginning after 1 January 2013. In accordance with the revised standard, actuarial gain / loss related to employee benefits shall be recognised in other comprehensive income.

Short-term employee benefits

Short-term employee benefit obligations are measured on an undiscounted basis and are expensed as the related service is provided.

A liability is recognised for the amount expected to be paid under short-term cash bonus if the Group has a present legal or constructive obligation to pay this amount as a result of past service provided by the employee and the obligation can be estimated reliably.

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3. Significant accounting policies *(continued)*

3.21. Segment reporting

An operating segment is a component of the Group that engages in business activities from which it may earn revenues and incur expenses, including revenues and expenses that relate to transactions with any of the Group’s other components, whose operating results are reviewed regularly by the Group’s Management Committee (being chief operating decision maker) to make decisions about resources allocated to each segment and assess its performance, and for which discrete financial information is available. Segment results that are reported to the Board of Directors include items directly attributable to that segment as well as those that can be allocated on a reasonable basis.

3.22. Events after the reporting period

Events after the reporting period that provide additional information about the Group’s position at the reporting dates (adjusting events) are reflected in the financial statements. Events after the reporting period that are not adjusting events are disclosed in the notes when material.

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4. Operating segments

The Group has four reportable segments, as described below, which are the Group’s strategic business units. The strategic business units offer different products and services, and are managed separately based on the Group’s management and internal reporting structure. For each of the strategic business units, the chief operating decision maker, the Board of Directors reviews internal management reports on at least a quarterly basis. The following summary describes the operations in each of the Group’s reportable segments:

Corporate and commercial banking

Includes loans, deposits and other transactions and balances with corporate customers.

Retail banking

Includes loans, deposits and other transactions and balances with retail customers.

Agricultural banking

Agricultural banking serves its customers in a way to cover transactions such as loans, deposits and non-cash loans.

Treasury

Undertakes the Group’s funding and centralised risk management activities through borrowings, and investing in liquid assets such as short-term placements and corporate and government debt securities.

Investment banking

Includes the Group’s trading and corporate finance activities.

Subsidiaries

Includes the profits of the subsidiaries.

Information regarding the results of each reportable segment is included in the following page. Performance is measured based on segment profit before income tax, as included in the internal management reports that are reviewed by the Board of Directors. Segment profit is used to measure performance as management believes that such information is the most relevant in evaluating the results of certain segments relative to other entities that operate within these industries. Inter-segment pricing is determined on an arm’s length basis.

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4. Operating segments (continued)

Information about operating segments

Current Period	Corporate and commercial banking	Retail banking	Treasury & other	Total operations
Operating income (*)	613,348	73,008	1,676,976	2,363,332
Operating loss (**)	-	-	(1,672,676)	(1,672,676)
Profit before tax	613,348	73,008	4,300	690,656
Income tax expense	-	-	(135,804)	(135,804)
Profit for the year	613,348	73,008	(131,504)	554,852
Segment assets	16,821,717	100,905	26,465,298	43,387,920
Subsidiaries	-	-	-	-
Total assets	16,821,717	100,905	26,465,298	43,387,920
Segment liabilities	12,259,430	12,101,069	14,611,555	38,972,054
Equity	-	-	4,415,866	4,415,866
Total liabilities	12,259,430	12,101,069	19,027,421	43,387,920

(*) Operating income includes net interest income, net fee and commission income and other income items presented in the consolidated statement of profit or loss.

(**) Operating loss includes salaries and employee benefits, provision for possible loan losses - net of recoveries, depreciation and amortisation and other expense items presented in the consolidated statement of profit or loss.

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4. Operating segments (continued)

Information about operating segments (continued)

Prior Period	Corporate and commercial banking	Retail banking	Treasury&other	Total operations
Operating income (*)	504,716	76,409	539,098	1,120,223
Operating loss (**)	-	-	(602,016)	(602,016)
Profit before tax	504,716	76,409	(62,918)	518,207
Income tax expense	-	-	(101,326)	(101,326)
Profit for the year	504,716	76,409	(164,244)	416,881
Segment assets	12,979,258	75,937	17,224,694	30,279,889
Subsidiaries	-	-	-	-
Total assets	12,979,258	75,937	17,224,694	30,279,889
Segment liabilities	6,697,792	8,423,067	11,930,075	27,050,934
Equity	-	-	3,228,955	3,228,955
Total liabilities	6,697,792	8,423,067	15,159,030	30,279,889

(*) Operating income includes net interest income, net fee and commission income and other income items presented in the consolidated statement of profit or loss.

(**) Operating loss includes salaries and employee benefits, provision for possible loan losses - net of recoveries, depreciation and amortisation and other expense items presented in the consolidated statement of profit or loss.

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5. Cash and cash equivalents

	31 December 2021	31 December 2020
Cash and cash equivalents	710,871	352,282
Loans and advances to banks (with original maturity of less than 3 months)	4,717,442	2,064,835
Unrestricted balances with the central bank	2,514,256	997,775
Receivables from reverse repurchase transactions	-	270,133
IFRS 9 allowances	3,423	1,484
Total cash and cash equivalents in the consolidated statement of financial position	7,945,992	3,686,509
Blocked loans and advances to banks and other financial institutions	(107,734)	-
Loans and advances to banks (with original maturity of more than 3 months)	-	(19,482)
Interest accruals on cash and cash equivalents	(16,995)	(246)
Cash and cash equivalents in the consolidated statement of cash flows	7,821,263	3,666,781

As at 31 December 2021, the deposits with banks (31 December 2020: None) which are blocked at financial institutions for the interest rate swaps and credit default swaps entered into by the Group is 107,734.

6. Balances with central bank

a) Unrestricted balances with central bank

	31 December 2021	31 December 2020
Demand deposits-TL	1,096,668	341,457
Demand deposits-FC	1,417,588	656,318
Total	2,514,256	997,775

b) Reserve deposits with central bank

	31 December 2021	31 December 2020
Foreign currency reserve	2,860,542	1,179,903
Total	2,860,542	1,179,903

Reserve deposits are kept as blockage in Central Bank of Turkey (CBRT) for foreign currency liabilities. The banks operating in Turkey keep reserve deposits for Turkish currency and foreign currency liabilities in TL and foreign currencies at the rates of 3.0% - 8.0% and 5.0% - 26.0%, respectively as per the Communiqué no.2005/1 “Reserve Deposits” of the CBRT (31 December 2020: 1.0% - 6.0% and 5.0% - 21.0% respectively).

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7. Financial assets at fair value through profit or loss

As at 31 December 2021 and 2020, financial assets at fair value through profit or loss comprised the following:

	31 December 2021		31 December 2020	
	Carrying value	Effective interest rate (%)	Carrying value	Effective interest rate (%)
Eurobonds issued by the Turkish				
Government	10,218	3.74-7.53	8,962	1.10-5.86
Government bonds in TL	512	20.02	65,417	15.49-16.07
Other	455	7.54-7.64	6	7.32
Total	11,185		74,385	

As at 31 December 2021, there are no financial assets at fair value through profit or loss given as collateral under repurchase agreements (31 December 2020: None).

As at 31 December 2021, there are no government securities kept at İstanbul Takas ve Saklama Bankası Anonim Şirketi (Takasbank - Istanbul Clearing and Custody Incorporation) and at Capital Markets Board of Turkey for legal requirements and as a guarantee for stock exchange and money market operations (31 December 2020: None).

8. Derivative financial assets / liabilities held for trading

In the ordinary course of business, the Group enters into various types of transactions that involve derivative financial instruments. A derivative financial instrument is a financial contract between two parties where payments are dependent upon movements in price in one or more underlying financial instruments, reference rates or indices. Derivative financial instruments of the Group mainly include foreign currency forwards, cross currency interest rate swaps, foreign currency options and credit default swaps.

The table below shows the favourable (assets) and unfavourable (liabilities) fair values of derivative financial instruments together with the notional amounts analysed by the term to maturity. The notional amount is the amount of a derivative’s underlying asset, reference rate or index and is the basis upon which changes in the value of derivatives are measured. The notional amounts indicate the volume of transactions outstanding at year-end and are neither indicative of the market risk nor credit risk.

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8. Derivative financial assets / liabilities held for trading (continued)

The fair value of derivative financial instruments is calculated by using forward exchange rates at the reporting date and option pricing models. In the absence of reliable forward rate estimations in a volatile market, current market rate is considered to be the best estimate of the present value of the forward exchange rates.

	31 December 2021								
	Fair value assets	Fair value liabilities	Notional amount in Turkish Lira equivalent	Up to 1 month	1 to 3 months	3 to 6 months	6 to 12 months	1 to 5 years	More than 5 years
<i>Derivatives financial instruments held for trading purpose:</i>									
Forward purchase contract	97,691	183,741	2,274,249	1,288,531	707,073	211,839	66,806	-	-
-Forward sale contract	-	-	2,328,330	1,309,860	753,675	214,414	50,381	-	-
Currency swap purchase	130,174	175,034	6,864,959	4,216,525	709,208	511,171	-	1,282,370	145,685
Currency swap sale	-	-	6,899,492	4,120,522	742,774	527,960	-	1,368,438	139,798
Interest swap purchase	42,303	8,522	3,495,000	125,000	300,000	1,300,000	1,610,000	160,000	-
Interest swap sale	-	-	3,495,000	125,000	300,000	1,300,000	1,610,000	160,000	-
Put option purchase	889,608	199,125	5,249,807	582,101	1,065,301	999,823	2,602,582	-	-
Put option sale	-	-	5,358,815	427,187	968,558	851,272	3,111,798	-	-
Total	1,159,776	566,422	35,965,652	12,194,726	5,546,589	5,916,479	9,051,567	2,970,808	285,483

	31 December 2020								
	Fair value assets	Fair value liabilities	Notional amount in Turkish Lira equivalent	Up to 1 month	1 to 3 months	3 to 6 months	6 to 12 months	1 to 5 years	More than 5 years
<i>Derivatives financial instruments held for trading purpose:</i>									
Forward purchase contract	28,984	11,680	992,326	515,627	209,880	139,578	127,241	-	-
Forward sale contract	-	-	953,777	512,377	195,719	133,573	112,108	-	-
Currency swap purchase	83,579	147,885	3,509,696	1,884,642	989,677	171,387	335,107	123,883	-
Currency swap sale	-	-	3,512,442	1,906,292	1,015,070	162,985	313,395	114,700	-
Interest swap purchase	15,572	5,070	2,233,645	54,750	1,177,252	415,582	145,582	234,506	205,973
Interest swap sale	-	-	2,288,978	62,097	1,225,238	415,582	145,582	234,506	205,973
Put option purchase	33,110	37,857	1,045,116	203,017	314,485	79,486	448,128	-	-
Put option sale	-	-	1,127,298	201,898	309,581	82,656	533,163	-	-
Total	161,245	202,492	15,663,278	5,340,700	5,436,902	1,600,829	2,160,306	712,595	411,946

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9. Investment securities

Financial assets at fair value through other comprehensive income

	31 December 2021		31 December 2020	
	Amount	Effective interest rate (%)	Amount	Effective interest rate (%)
Eurobonds issued by the Turkish Government	-	-	1,289,187	15.6-16.07
Foreign currency denominated bonds	1,339,351	(0.76)-7.70	846,803	(0.82)-5.86
Equity instruments	37,854	-	24,704	-
Total	1,377,205		2,160,694	

The movement of financial assets at fair value through other comprehensive income is as follows:

	1 January – 31 December 2021	1 January – 31 December 2020
Balance at beginning of period	2,160,694	749,337
Foreign currency differences on monetary assets	553,345	180,550
Purchases during the period	222,067	1,260,905
Disposals through sales and redemptions	(294,372)	(72,947)
Changes in amortised cost	(1,264,529)	42,849
Balance at the end of period	1,377,205	2,160,694

Carrying value of financial assets at FVOCI given as collateral under repurchase agreements and for other banking transactions under the normal course of the banking operations are as follows:

	31 December 2021	31 December 2020
Deposited at financial institutions for repurchase transactio	18,093	1,109,261
Collaterals	971,790	599,915
Other	387,322	451,518
Total	1,377,205	2,160,694

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9. Investment securities (continued)

Financial assets measured at amortised cost

	31 December 2021		31 December 2020	
	Amount	Effective interest rate (%)	Amount	Effective interest rate (%)
<i>Debt instruments:</i>				
Foreign currency denominated bonds	936,597	(0.65)-8.30	612,263	0.66-8.28
TL denominated government bonds	2,317,944	9.19-21.55	3,611,991	8.04-17.45
Total	3,254,541		4,224,254	

The movement of financial assets measured at amortised cost is as follows:

	1 January – 31 December 2021	1 January – 31 December 2020
Balance at beginning of period	4,224,254	547,887
Foreign currency differences on monetary assets	266,762	127,515
Purchases during the period	234,492	4,454,907
Disposals through sales and redemptions	(1,513,189)	(892,395)
Changes in amortised cost	44,637	(12,862)
Changes in allowance for impairment	(2,415)	(798)
Balance at the end of period	3,254,541	4,224,254

Carrying value of financial assets measured at amortised cost given as collateral under repurchase agreements and for other banking transactions under the normal course of the banking operations are as follows:

	31 December 2021	31 December 2020
Deposited at financial institutions for repurchase transactions	2,044,065	3,595,810
Collaterals	1,001,483	85,784
Other	208,993	542,660
Total	3,254,541	4,224,254

As at 31 December 2021, carrying value of financial assets measured at amortised cost collateralised against repurchase agreements is TL 2,044,065 (31 December 2020: TL 3,595,810).

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10. Loans and receivables

	31 December 2021						
	Amount				Effective interest rate (%)		
	TL	FC	FC Indexed	Total	TL	FC	FC indexed
Corporate loans	13,163,683	10,804,958	29,454	23,997,795	0.00-60.00	0.10-9.48	-
Consumer loans	107,361	-	649	108,010	0.00-35.40	3.00-8.76	5.88-8.76
Credit cards	98,905	66	-	98,971	21.60-24.00	-	-
Factoring receivables	834,741	-	-	834,741	19.31-36.21	-	-
Total performing loans	14,204,690	10,804,724	30,103	25,039,517			
Non-performing loans	-	-	-	1,264,871	-	-	-
Allowance for:				-			
Individually impaired loans	-	-	-	(783,766)	-	-	-
Collectively impaired loans	-	-	-	(128,444)	-	-	-
Loans and receivables, net	-	-	-	25,392,178	-	-	-

	31 December 2020						
	Amount				Effective interest rate (%)		
	TL	FC	FC Indexed	Total	TL	FC	FC indexed
Corporate loans	11,735,156	4,808,176	37,161	16,580,493	3.00-49.50	0.20-10.50	4.68-8.40
Consumer loans	97,583	39	976	98,598	0.12-33.00	0.75	4.80-8.76
Credit cards	67,494	15	-	67,509	16.20-19.08	-	-
Factoring receivables	543,593	-	-	543,593	11.00-29.40	-	-
Total performing loans	12,443,826	4,808,230	38,137	17,290,193			
Non-performing loans	-	-	-	1,351,191	-	-	-
Allowance for:				-			
Individually impaired loans	-	-	-	(809,896)	-	-	-
Collectively impaired loans	-	-	-	(115,922)	-	-	-
Loans and receivables, net	-	-	-	17,715,566	-	-	-

“Loans and receivables” captions in the statement of financial position include the following:

	31 December 2021	31 December 2020
Loans and receivables measured at amortised cost	25,396,685	18,001,026
Factoring receivables	841,320	554,650
Less: impairment loss allowance	(912,210)	(925,818)
Loans and receivables at FVTPL (*)	66,383	85,708
Total loans and receivables	25,392,178	17,715,566

(*) Includes the loan provided to a special purpose entity (Levent Yapılandırma Yönetimi A.Ş.). This loan is accounted under loans measured at FVTPL based on IFRS 9. The fair value of this loan is determined by the independent valuation company based on the average of different methodologies (discounted cash flows, similar market multipliers, same sector transaction multipliers, market value and analyst reports). The corresponding loan is considered as Level 3 based on IFRS 13 “Fair Value Measurement” standard.

Valuation techniques considered in the valuation work and any possible changes in the basic assumptions may affect the carrying value of the related asset. For discounted cash flows method, significant unobservable inputs are EBITDA, growth rate and weighted average cost of capital. The estimated fair value of the asset would increase if growth rate and EBITDA are higher and decrease if the weighted average cost of capital is higher. Trading multiples and transaction multiples for the companies operating in the same sector are the other valuation techniques for pricing the assets. Transaction multiples for the companies operating in the same sector are based on similar transactions based on geographical features, industry, size, target market and other factors. Transaction multiples are derived by dividing the enterprise values of the companies to EBITDAs. The estimated fair value of the asset would increase if the multiples were higher and decrease if multiples were lower.

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10. Loans and receivables (continued)

The specific allowance for possible loan losses is comprised of amounts for specifically identified as being impaired and non-performing loans and receivables plus a further amount considered adequate to cover the inherent risk of loss present in the lending relationships presently performing in accordance with agreements made with borrowers.

Movements in the reserve for possible loan losses:

	1 January – 31 December 2021	1 January – 31 December 2020
Reserve at beginning of the period/year	925,818	905,140
Provision for possible loan losses, net of recoveries	52,801	19,636
Provision for possible loan losses	422,271	468,799
Recoveries	(369,470)	(449,163)
Provision, net of recoveries	52,801	19,636
Loans written-off during the period/year	(79,369)	(1,568)
Foreign currency differences on monetary assets	12,960	2,610
Reserve at end of the period/year	912,210	925,818

The movement of loss allowances per asset class for loans and receivables as of 31 December 2021 is as follows:

Loans and receivables	31 December 2021			
	Stage 1	Stage 2	Stage 3	Total
Balances at 1 January 2021	52,504	62,191	811,123	925,818
Additions	166,397	57,637	198,237	422,271
Disposals	(153,157)	(51,671)	(164,642)	(369,470)
Debt sales	-	-	-	-
Write offs	-	-	-	-
Transfer to stage 1	(5,259)	8,780	(3,521)	-
Transfer to stage 2	(592)	(12,152)	12,744	-
Transfer to stage 3	2,665	1,190	9,105	12,960
Effects of movements in exchange rates	(3)	(86)	(79,280)	(79,369)
Balances at the end of the period	62,555	65,889	783,766	912,210

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10. Loans and receivables (continued)

The credit quality analysis of loans and receivables excluding factoring receivables, including related income accruals, is as follows as at 31 December 2021 and 2020:

	31 December 2021		
	Stage 1	Stage 2	Stage 3
Stage 1: Low-fair risk	23,189,014	-	-
Stage 2: Watch list	-	690,994	-
Stage 3.1: Substandard	-	-	63,832
Stage 3.2: Doubtful	-	-	89,504
Stage 3.3: Loss	-	-	817,336
Total loans	23,189,014	690,994	970,672
Income accrual on loans	381,286	(56,518)	294,199
Loss allowance	(62,555)	(65,889)	(783,766)
Total carrying amount	23,507,745	568,587	481,105

	31 December 2020		
	Stage 1	Stage 2	Stage 3
Stage 1 : Low-fair risk	15,626,284	-	-
Stage 2 : Watch list	-	953,539	-
Stage 3.1: Substandard	-	-	29,734
Stage 3.2: Doubtful	-	-	101,056
Stage 3.3: Loss	-	-	938,682
Total loans	15,626,284	953,539	1,069,472
Income accrual on loans	127,113	39,663	281,719
Loss allowance	(50,939)	(62,188)	(812,691)
Total carrying amount	15,702,458	931,014	538,500

11. Factoring receivables

As at 31 December 2021 and 2020, short-term and long-term factoring receivables included in the loans and receivables are as follows:

	31 December 2021	31 December 2020
Short-term	828,670	548,070
Long-term	12,650	6,580
Total	841,320	554,650

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12. Property and equipment

Movements of property and equipment as at and for the year ended 31 December 2021 and 2020 are as follows:

	Buildings	Motor vehicles	Right of use assets	Furniture, office equipment and leasehold improvements	Total
<u>Cost</u>					
Opening balance, 1 January 2020	215,609	1,683	91,678	103,262	412,232
Additions	1,383	152	34,656	26,452	62,643
Disposals	(426)	(1,166)	(16,859)	(3,565)	(22,016)
Effect of movements in exchange rates	-	-	-	-	-
Revaluation	3,483	-	-	-	3,483
Closing balance, 31 December 2020	220,049	669	109,475	126,149	456,342
Opening balance, 1 January 2021	220,049	669	109,475	126,149	456,342
Additions	6,269	-	47,746	31,927	85,942
Disposals	-	(38)	(17,028)	(35,416)	(52,482)
Effect of movements in exchange rates	-	310	72	11,161	11,543
Revaluation	70,217	-	-	-	70,217
Closing balance, 31 December 2021	296,535	941	140,265	133,821	571,562
<u>Accumulated depreciation</u>					
Opening balance, 1 January 2020	-	1,650	21,008	71,982	94,640
Additions	-	179	24,415	19,219	43,813
Disposals	-	(1,160)	(8,724)	(5,125)	(15,009)
Revaluation	-	-	-	-	-
Closing balance, 31 December 2020	-	669	36,699	86,076	123,444
Opening balance, 1 January 2021	-	669	36,699	86,076	123,444
Additions	-	-	29,588	17,955	47,543
Disposals	-	(38)	(2,228)	(25,371)	(27,637)
Effect of movements in exchange rates	-	310	(18)	8,171	8,463
Closing balance, 31 December 2021	-	941	64,041	86,831	151,813
<u>Net carrying value</u>					
1 January 2020	215,609	33	70,670	31,280	317,592
31 December 2020	220,049	-	72,776	40,073	332,898
31 December 2021	296,535	-	76,224	46,990	419,749

As of 31 December 2021, if the buildings were accounted based on cost model instead of revaluation model, the net carrying value would be TL 123,775 (31 December 2020: TL 124,628).

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13. Intangible assets

Movements of intangible assets as at and for the year ended 31 December 2021 and 2020 are as follows:

	Software	Other intangibles	Total
<u>Cost</u>			
Opening balance, 1 January 2020	22,279	1,356	23,635
Additions	9,165	-	9,165
Disposals	(2)	-	(2)
Closing balance, 31 December 2020	31,442	1,356	32,798
Opening balance, 1 January 2021	31,442	1,356	32,798
Additions	17,329	-	17,329
Disposals	(7,890)	-	(7,890)
Closing balance, 31 December 2021	40,881	1,356	42,237
<u>Accumulated amortisation</u>			
Opening balance, 1 January 2020	10,681	1,356	12,037
Additions	4,595	-	4,595
Closing balance, 31 December 2020	15,276	1,356	16,632
Opening balance, 1 January 2021	15,276	1,356	16,632
Additions	6,544	-	6,544
Disposals	(7,890)	-	(7,890)
Closing balance, 31 December 2021	13,930	1,356	15,286
<u>Net carrying value</u>			
1 January 2020	11,598	-	11,598
31 December 2020	16,166	-	16,166
31 December 2021	26,951	-	26,951

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14. Other assets

	31 December 2021	31 December 2020
Transfer cheques	335,991	240,107
Assets held for sale (*)	256,962	258,829
Collateral for leveraged operations ⁽¹⁾	38,598	62,427
Prepaid expenses	9,891	6,580
Credit card payments	15,201	6,575
Advances given	40	55
Collateral for OTC operations	45,284	61,412
Other	62,582	31,590
Total	764,549	667,575

(1) Collateral for leveraged operations are composed of the collaterals given for transactions, which take place through Anadolu Yatırım Menkul Kıymetler AŞ.

(*) Within the context of the existing loan agreements, all creditors including the Bank have reached an agreement on restructuring the loans granted to Ojer Telekomünikasyon A.Ş. (OTAŞ) who is the main shareholder of Türk Telekomünikasyon A.Ş. (Türk Telekom) and it is contemplated that Türk Telekom’s number of 192,500,000,000 A group shares owned by OTAŞ, representing 55% of its issued share capital corresponding to A group shares have been pledged as a guarantee for the existing facilities would be taken over by a special purpose entity which is incorporated or will be incorporated in the Turkish Republic, and owned by directly or indirectly by all creditors. As per the agreed structure, it is agreed on the corresponding agreements, completed all required corporate and administrative permissions and the transaction is concluded by a transfer of the aforementioned shares to the special purpose entity incorporated in the Turkish Republic, and owned by directly or indirectly by all creditors. In this context, the Bank owned 0.37% of the founded special purpose entity and the related investment TL 14,686 (TL 0, net) is considered within the scope of IFRS 5 “Assets Held for Sale and Discontinued Operations”.

As per the decision made at the annual general assembly of the related special purpose entity (Levent Yapılandırma Yönetimi A.Ş.), it was decided to increase the capital of the special purpose entity by TL 3,982,230 all of which will be covered by shareholders’ receivables. As a result, the paid-in capital of the company increased to TL 3,982,280. After the increase, 0.37% share of the bank in the company capital did not change and the number of shares had become 1,468,584,763. The nominal value of the shares owned by the Bank is TL 14,686 (TL 0, net) and is classified as assets held for sale. The valuation differences are recorded as impairment in assets held for sale after capital increase.

Assets held for sale

An asset (or a disposal group) classified as asset held for sale is measured at lower of the carrying amount and fair value less costs to sell. An asset (or a disposal group) is regarded as asset held for sale only when the sale is highly probable and the asset (disposal group) is available for immediate sale in its present condition. For a highly probable sale, there must be a valid plan prepared by the management for the sale of asset including identification of possible buyers and completion of sale process. Furthermore, the asset should be actively marketed at a price consistent with its fair value.

As at 31 December 2021, TL 256,962 (31 December 2020: TL 258,829) of the other assets is comprised of foreclosed real estates acquired by the Bank against its impaired receivables.

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15. Deposits

Deposits from banks

	31 December 2021				31 December 2020			
	Amount		Effective interest rate (%)		Amount		Effective interest rate (%)	
	TL	FC	TL	FC	TL	FC	TL	FC
Demand	7	118	-	-	8	70	-	-
Time	102,889	-	15.00	-	45,605	74,193	13.50-14.00	0.2
Total	102,896	118			45,613	74,263		

Deposits from customers

	31 December 2021				31 December 2020			
	Amount		Effective interest rate (%)		Amount		Effective interest rate (%)	
	TL	FC	TL	FC	TL	FC	TL	FC
<i>Saving:</i>								
Demand	102,754	3,235,107	-	-	62,863	1,492,642	-	-
Time	6,052,627	10,084,261	4.00-29.00	0.01-2.50	6,263,421	5,233,406	1.00-17.50	0.05-3.00
	6,155,381	13,319,368			6,326,284	6,726,048		
<i>Commercial and other deposits:</i>								
Demand	490,848	2,018,918	-	-	413,292	1,139,705	-	-
Time	3,132,965	8,181,863	0.10-23.00	0.01-1.80	2,745,233	2,303,161	0.01-19.00	0.01-2.75
	3,623,813	10,200,781			3,158,525	3,442,866		
Total	9,779,194	23,520,149			9,484,809	10,168,914		

The Parent Bank decided on implementing its strategy to avoid any possible currency risks originating from its consolidated subsidiary, Anadolubank NV, as of 1 May 2018, to the extent that foreign exchange denominated net asset value of Anadolubank Nederland NV and Euro denominated term deposit accounts of Anadolubank as a protective measure against currency risks would be correlated consequently with protective measures against net investment risk. Any relevant changes on financial debts related to currency volatilities are being kept on the Parent Bank’s books under equity as other accumulated comprehensive income and expenses that are to be booked as profit or loss.

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15. Deposits (continued)

The amounts relating to items designated as hedging instruments at 31 December 2021 and 2020 were as follows.

	Nominal amount	Carrying amount		Line item in the statement of financial position where the hedging instrument is included	Change in fair value used for calculating hedge ineffectiveness for 2020	Change in the value of the hedging instrument recognised in OCI
		Assets	Liabilities			
2020	Foreign currency denominated deposits EUR 96 million	-	875,174	Deposits	(235,613)	(235,613)
2021	Foreign currency denominated deposits EUR 100 million	-	1,508,670	Deposits	(292,687)	(292,687)

Other money market deposits

	31 December 2021				31 December 2020			
	Amount		Effective interest rate (%)		Amount		Effective interest rate (%)	
	TL	FC	TL	FC	TL	FC	TL	FC
<i>Obligations under repurchase agreements and Interbank Money Markets Borrowings:</i>								
Due to banks	1,458,167	698,958	-	(0.25)-1.35	4,128,361	640,695	-	(0.25)-1.90
Other	50,031	-	11.90-14.00	-	90,052	-	16.99-18.36	-
Total	1,508,198	698,958			4,218,413	640,695		

As at 31 December 2021, there are no carrying values of underlying financial assets at fair value through profit or loss collateralised against repurchase agreements (31 December 2020: None). Financial asset measured at amortised cost collateralised against repurchase agreements amounts to TL 2,044,065 (31 December 2020: TL 3,595,810) and carrying values of underlying financial assets at FVOCI collateralised against repurchase agreements amounts to TL 18,093 (31 December 2020: TL 1,109,261).

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16. Funds borrowed

	31 December 2021				31 December 2020			
	Amount		Effective interest rate (%)		Amount		Effective interest rate (%)	
	TL	FC	TL	FC	TL	FC	TL	FC
Short-term ^(*)	658,462	412,946	14.15-30.45	0.28-2.85	431,582	626,748	7.25-17.75	2-4.11
Medium/long term ^(*)	15,451	533,382	17.50	(0.50)-3.10	-	260,759	-	(0.50)-2.74
Total	673,913	946,328			431,582	887,507		

^(*) Borrowings are presented considering their original maturities and factoring payables are excluded.

Repayment plans of funds borrowed are as follows:

	31 December 2021	31 December 2020
2021	1,084,444	1,127,526
2022	317,325	9,695
2023	218,472	181,868
Total	1,620,241	1,319,089

17. Debt securities issued

As of 31 December 2021, the Group has issued debt securities amounting to TL 0 (31 December 2020: TL 0). Details of the debt securities issued are as follows:

	Latest maturity	Interest rate %	Carrying value
TL denominated bonds payable	2021	-	-
	Latest maturity	Interest rate %	Carrying value
TL denominated bonds payable	2020	-	-

18. Obligations from leasing transactions

As of 1 January 2019, IFRS 16 Leases standard is started to be applied, and the difference between lease transactions and operating transactions ended. Lease transactions have been started to be displayed by the tenants under the Liabilities from Leasing Transactions item.

As of 31 December 2021, the Group's liabilities arising from leasing transactions are as follows:

	31 December 2021		31 December 2020	
	Gross	Net	Gross	Net
Less than 1 year	24,559	21,285	14,837	13,146
Between 1-4 years	24,399	19,656	30,404	23,537
More than 4 years	90,928	51,767	94,089	49,515
Total	139,886	92,708	139,330	86,198

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19. Other liabilities and provisions

	31 December 2021	31 December 2020
Transfer orders	502,882	314,151
Collections from guarantee cheques	75,665	42,196
Reserve for employee severance indemnity and vacation	62,389	51,170
- <i>Employee severance indemnity</i>	40,370	33,555
- <i>Vacation pay liability</i>	22,019	17,615
Taxes other than on income	50,919	43,829
Collateral for leveraged operations	13,682	39,521
Assignment fee	42,629	107,312
Payables due from credit cards	66,607	44,521
Personnel bonuses	22,072	15,281
Provision for lawsuits	11,936	12,335
From loan commissions	37,249	27,544
Other various provisions	10,508	6,497
Other	176,921	77,369
Total	1,073,459	781,726

The movement of employee severance indemnity is as follows:

	1 January – 31 December 2021	1 January – 31 December 2020
Net liability at the beginning of the year	33,555	28,672
Payments during the period	(5,915)	(6,418)
Actuarial losses	3,098	2,652
Changes during the period	9,632	8,649
Total	40,370	33,555

IAS 19 requires that all actuarial gains and losses to be recognised immediately in other comprehensive income in accordance with the change in IAS 19.

The movement of vacation pay liability is as follows:

	1 January – 31 December 2021	1 January – 31 December 2020
Total provision at the beginning of the year	17,615	13,982
Paid during the year	(1,873)	(1,626)
Total expense recognised in the profit or loss	6,277	5,259
Total	22,019	17,615

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20. Income taxes

Major components of income tax expense:

	2021	2020
<i>Current income taxes:</i>		
Current income tax charge	(48,499)	(64,047)
<i>Deferred taxes:</i>		
Relating to origination and reversal of temporary differences	(87,305)	(37,279)
Income tax expense	(135,804)	(101,326)

The current income tax charges and prepaid taxes are detailed below:

	31 December 2021	31 December 2020
Current income tax charge	48,499	64,047
Advance taxes	(38,816)	(35,459)
Current tax liability	9,683	28,588

The Bank is subject to Turkish corporate taxes. Provision is made in the accompanying consolidated financial statements for the estimated charge based on the Group’s results for the years and periods. Turkish tax legislation does not permit a parent company and its subsidiary to file a consolidated tax return. Therefore, provisions for taxes, as reflected in the accompanying consolidated financial statements, have been calculated on a separate-entity basis.

As at 31 December 2021 and 2020, deferred tax assets and liabilities are attributable to the following items:

	31 December 2021		31 December 2020	
	Deferred tax Assets/ (Liabilities)		Deferred tax Assets/ (Liabilities)	
	Asset	Liability	Asset	Liability
Valuation difference of derivative financial instruments	-	(148,139)	3,448	-
Differences in the measurement of the debt securities	-	(16,600)	-	(2,167)
Personnel bonuses	4,209	-	3,056	-
Reserve for employee severance indemnity and vacation	13,195	-	10,254	-
Valuation of financial assets at FVOCI	29,196	-	10,343	-
Loan loss provisions	28,094	-	21,653	-
Revaluation of property and equipment	-	(16,418)	-	(9,402)
Financial Loss	153,755	-	-	-
Other	45,798	(57)	17,131	(384)
Total deferred tax assets/(liabilities)	274,247	(181,214)	65,885	(11,953)
Offsetting	(181,214)	181,214	(11,953)	11,953
Deferred tax assets/(liabilities)	93,033	-	53,932	-

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20. Income taxes (continued)

	1 January – 31 December 2021	1 January – 31 December 2020
Deferred tax asset / (liability) at 1 January	53,932	38,897
Deferred tax recognised in profit or loss	(87,305)	(37,279)
Deferred tax recognised in equity	126,406	52,314
Deferred tax asset / (liability) at 31 December	93,033	53,932

The Group has offset the deferred tax assets and deferred tax liabilities on an entity by entity basis based on the legally enforceable right to set off the recognised amounts such as offsetting current tax assets against current tax liabilities and when the deferred income taxes relate to the same fiscal authority.

	31 December 2021	31 December 2020
Deferred tax assets	93,033	53,932
Total	93,033	53,932

A reconciliation of income tax expense applicable to profit from operating activities before income taxes at the statutory income tax rate to income tax expense at the Group's effective income tax rate for the year ended 31 December 2021 and 2020 were as follows:

	2021	2020
Net profit from ordinary activities before income taxes and non-controlling interest	690,656	518,207
Taxes on income per statutory tax rate	141,027	104,395
Disallowable expenses	631	788
Effect of income not subject to tax	(5,854)	(3,857)
Income tax expense	135,804	101,326

For the year ended 31 December 2021, the effective tax rate is 19.66% (2020: 19.55%).

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21. Capital and reserves

Share capital

	31 December 2021	31 December 2020
Number of common shares, TL 0.01 (in full TL), par value authorised, issued and outstanding 60,000 millions	1,100,000	600,000

As at 31 December 2021 and 2020, the authorised nominal share capital of the Bank amounted to TL 1,100,000 and TL 600,000.

As at 31 December 2021 and 2020, the composition of shareholders and their respective percentage of ownership can be summarised as follows:

	31 December 2021		31 December 2020	
	Amount	%	Amount	%
Habaş Sınai ve Tıbbi Gazlar İstihsal Endüstrisi AŞ	915,364	83.22	419,867	69.98
Mehmet Rüştü Başaran	167,992	15.27	163,895	27.32
Other shareholders	16,644	1.51	16,238	2.70
Nominal value	1,100,000	100.00	600,000	100.00
Restatement effect per IAS 29	2,619		2,619	
Total	1,102,619		602,619	

Translation reserve

The translation reserve comprises all foreign currency differences arising from the translation of the financial statements of foreign operations, as well as the effective portion of any foreign currency differences arising from hedges of a net investment in a foreign operation. As at 31 December 2021 and 2020, the amounts of translation reserve of the Bank are TL 1,237,594 and TL 624,652 respectively.

Fair value reserve

The fair value reserve comprises the effective portion of the cumulative net change in the fair value of financial assets at fair value through other comprehensive income/(net change in the fair value of FVOCI as at 31 December 2020 until the assets are derecognized or impaired. As at 31 December 2021 and 2020, the amounts of fair value reserve of the Bank are TL (81,143) and TL (31,327) respectively.

Hedging reserve

The Parent Bank decided on implementing its strategy to avoid any possible currency risks originating from its consolidated subsidiary, Anadolubank NV, as of 1 May 2018, to the extent that foreign exchange denominated net asset value of Anadolubank Nederland NV and Euro denominated term deposit accounts of Anadolubank as a protective measure against currency risks would be correlated consequently with protective measures against net investment risk. Any relevant changes on financial debts related to currency volatilities are being kept on the Parent Bank’s books under equity as other accumulated comprehensive income and expenses that are to be booked as profit or loss.

As of 31 December 2021, the nominal amount of transactions of Anadolubank Netherlands for hedging the risk of changes in fair value is TL 769,422. Transactions aimed at hedging cash flow risk amount to TL 745,922.

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21. Capital and reserves (continued)

Other reserves and legal reserves

Other reserves consist of the revaluation of property and equipment and actuarial difference in total of TL 126,204 (31 December 2020: Revaluation of property and equipment which is amounted to TL 66,219).

The legal reserves consist of first and second legal reserves in accordance with the Turkish Commercial Code and amounted to TL 136,838 (31 December 2020: TL 116,072). 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.

Non-controlling interests

As at 31 December 2021, non-controlling interests amount to TL 8,366 (31 December 2020: TL 5,833).

22. 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 financial and operating decisions. The Group is controlled by Habaş Sınai ve Tıbbi Gazlar İstihsal Endüstrisi AŞ which owns 83.22 % (31 December 2020: 69.98%) of ordinary shares, and included in Habaş Group of companies. For the purpose of these consolidated financial statements, shareholders and Habaş Group companies are referred to as related parties. Related parties also include individuals that are principal owners and management and members of the Group’s Board of Directors and their families. In the course of conducting its banking business, the Group conducted various business transactions with related parties on commercial terms.

The following significant balances exist and transactions have been entered into with related parties:

Outstanding balances

	31 December 2021	31 December 2020
Cash loans	414,619	171,357
Non-cash loans	91,593	198,659
Deposits taken	6,604,572	2,080,956
Derivative financial assets	2,277	391,862

Transactions

	1 January – 31 December 2021	1 January – 31 December 2020
Interest income	9,326	6,365
Interest expense	49,166	23,171
Other operating income	-	-

Directors’ remuneration

For the year ended 31 December 2021, the key management and the members of the Board of Directors received remuneration and fees amounting to TL 54,170 (31 December 2020: TL 37,886).

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23. Interest income / expenses

	1 January – 31 December 2021	1 January – 31 December 2020
Interest on loans and receivables	2,830,257	1,760,956
Interest on marketable securities	522,278	440,997
<i>Financial assets at FVTPL</i>	1,347	16,232
<i>Financial assets at FVOCI</i>	46,338	98,244
<i>Financial assets measured at amortized cost</i>	474,593	326,521
Interest on loans and advances to banks and other financial institutions	73,800	21,784
Interest on other money market placements	7,796	29,605
Other interest income	11,918	15,880
Total interest income	3,446,049	2,269,222

	1 January – 31 December 2021	1 January – 31 December 2020
Interest on deposits	1,820,149	1,073,731
Interest on other money market deposits	497,793	367,132
Interest on funds borrowed	104,989	42,304
Interest on securities issued	-	12,531
Interest on finance lease expenses	16,201	16,424
Other interest expenses	14,723	23,105
Total interest expenses	2,453,855	1,535,227

24. Fee and commission income / expenses

	1 January – 31 December 2021	1 January – 31 December 2020
From non-cash loans	51,541	44,951
Other	280,647	185,184
<i>From cash loans</i>	115,411	98,373
<i>From individual loan application</i>	16,863	16,448
<i>Other</i>	148,373	70,363
Fee and commission income	332,188	230,135

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24. Fee and commission income / expenses

	1 January – 31 December 2021	1 January – 31 December 2020
Credit card commissions	8,242	8,995
Credit card exchange commissions	15,693	6,240
Foreign correspondents’ commissions	5,073	3,726
EFT commissions	2,768	3,475
Istanbul stock exchange commissions	3,430	3,125
Credit bureau commissions	1,909	1,818
ATM commissions	549	790
Securities commissions	1,599	369
Other	4,080	1,040
Fee and commission expenses	43,343	29,578

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25. Salaries and employee benefits

	1 January – 31 December 2021	1 January – 31 December 2020
<i>Staff costs:</i>		
Wages and salaries	317,063	266,163
Cost of defined contribution plan (employer’s share of social security premiums)	43,986	36,053
Other fringe benefits	34,410	27,168
Provision for employee termination benefits and unused vacation accruals	28,787	18,859
Total	424,246	348,243

The average number of employees during the years is:

	1 January – 31 December 2021	1 January – 31 December 2020
The Bank	1,655	1,646
Subsidiaries	163	162
Total	1,818	1,808

26. Other expenses

	1 January – 31 December 2021	1 January – 31 December 2020
Forex expenses	69,037	27,731
Saving Deposit Insurance Fund Premium	21,425	16,778
Communication expenses	17,035	12,570
Chartered accountants	13,017	9,983
Maintenance expenses	9,596	8,371
Energy costs	9,679	8,164
Cleaning service expenses	6,375	5,629
Transportation expenses	7,054	5,494
Expertise expenses	3,628	3,799
BRSA participation fee	3,512	2,853
Advertising expenses	5,191	1,568
Office supplies	2,258	1,296
Operating lease charges	447	932
Other	74,857	21,618
Total	243,111	126,786

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27. Commitments and contingencies

In the ordinary course of business activities, the Bank and its subsidiaries undertake various commitments and incur certain contingent liabilities that are not presented in the consolidated financial statements. Commitments and contingent liabilities comprise the following:

	31 December 2021	31 December 2020
Letters of guarantee	5,075,958	3,958,082
Letters of credit	2,184,148	1,190,933
Acceptance credits	48,414	4,935
Other guarantees	1,439,750	1,397,416
Total non-cash loans	8,748,270	6,551,366
Credit card limit commitments	149,422	128,873
Other commitments	2,924,504	1,866,299
Total	11,822,196	8,546,538

Litigations

In the normal course of its operations, the Group faces with legal disputes, claims and complaints. The necessary provision, if any, for those cases are provided based on management estimates and professional advice.

As at 31 December 2021, there are 268 cases against the Group which have a probability to result against the Group with respect to information received from Law Departments of the Group. The total amount of these cases is TL 7,000 and provision amount for these cases is TL 11,936.

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28. Financial risk management

(a) Introduction and overview

This note presents information about the Group’s exposure to each of the below risks, the Group’s objectives, policies and processes for measuring and managing risk, and the Group’s management of capital. The Group has exposure to the following risks from its use of financial instruments:

- credit risk
- liquidity risk
- market risks
- operational risks

Risk management framework

The Board of Directors has overall responsibility for the establishment and oversight of the Group’s risk management framework. The Board of Directors monitors the effectiveness of the risk management system through the audit committee. Consequently, the Risk Management Department, which carries out the risk management activities and works independently from executive activities, report directly to the Board of Directors.

The Bank’s risk management policies are established to identify and analyse the risks faced by the Bank, to set appropriate risk limits and controls, and to monitor risks and adherence to limits. Risk management policies and systems are reviewed regularly to reflect changes in market conditions, products and services offered. The Group, through its training and management standards and procedures, aims to develop a disciplined and constructive control environment, in which all employees understand their roles and obligations.

The risks are measured with the internationally accepted methodologies in compliance with local and international regulations, the Bank’s structure, policy and procedures. They are effectively managed and assessed in a continuously growing manner. At the same time, studies for compliance with the international banking applications, such as Basel III, are carried out.

Audit Committee: The Audit Committee consists of two members of the Board of Directors who do not have any executive functions. The Audit Committee, established to assist the Board of Directors in its auditing and supervising activities, is responsible for:

- The supervision of the efficiency and effectiveness of the internal control, risk management and internal audit systems of the Bank, functioning of these systems as well as accounting and reporting systems within the framework of related procedures, and the integrity of information generated;
- The preliminary assessment on the selection process of independent audit firms and the systematic monitoring of the activities of these companies;
- The maintenance and coordination of the internal audit functions of corporations subject to consolidated internal audits.

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28. Financial risk management (continued)

(b) Credit risk

Credit risk is most simply defined as the potential that a bank borrower or counterparty will fail to meet its obligations in accordance with agreed terms. Credit risk is defined as the probability of loss if the customer or counterparty fails to meet its obligations partially or completely on the terms set. Credit risk is considered in depth covering the counterparty risks arising from not only from future or option contracts but also credit risks originating from the transactions in Banking Law.

Exposure to credit risk

	Loans and receivables to customers		Other assets	
	2021	2020	2021	2020
Impaired	1,266,494	1,346,355	4,699	4,836
Individual allowance for impairment	(779,067)	(807,855)	(4,699)	(4,836)
Carrying amount	487,427	538,500	-	-
Past due but not impaired	24,595	69,695	-	-
Carrying amount	24,595	69,695	-	-
Neither past due nor impaired	24,662,475	16,684,998	-	-
Loans with renegotiated terms	346,125	535,500	-	-
Carrying amount	25,008,600	17,220,498	-	-
Collective allowance for impairment	(128,444)	(113,127)	-	-
Total carrying amount	25,392,178	17,715,566	-	-

Impaired loans and receivables

Impaired loans and receivables are loans and receivables for which the Group determines that it is probable that it will be unable to collect all principal and interest due according to the contractual terms of the loan agreements.

Past due but not impaired loans

Loans and receivables where contractual interest or principal payments are past due but the Group believes that impairment is not appropriate on the basis of the level of security / collateral available and / or the stage of collection of amounts owed to the Group.

Loans with renegotiated terms

Loans with renegotiated terms are loans that have been restructured due to temporary deterioration in the borrower’s financial position and where the Group has made concessions that it would not otherwise consider. Once the loan is restructured it remains in this category independent of satisfactory performance after restructuring.

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28. Financial risk management (continued)

(b) Credit risk (continued)

Write-off policy

The Group writes off a loan / security balance (and any related allowances for impairment losses) when Group determines that the loans / securities are uncollectible. This determination is reached after considering information such as the occurrence of significant changes in the borrower / issuer’s financial position such that the borrower / issuer can no longer pay the obligation, or that proceeds from collateral will not be sufficient to pay back the entire exposure and the completion of the legal procedure. For smaller balance standardised loans, charge off decisions generally are based on a product specific past due status.

The Bank has written off the non-performing loans from the loan portfolio as of 31 December 2021 and subtracted which is amounted to TL 79,369. (31 December 2020 TL 1,568)

Collateral policy

The Group holds collateral against loans and receivables 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 loans and advances to banks, except when securities are held as part of reverse repurchase and securities borrowing activity. Collateral usually is not held against investment securities, and no such collateral was held at 31 December 2021 or 2020.

The breakdown of performing cash and non-cash loans and receivables to customers by type of collateral is as follows:

Cash loans	31 December 2021	31 December 2020
Secured loans:		
Secured by cash collateral	674,595	532,599
<i>Secured by mortgages</i>	1,947,615	1,753,378
<i>Secured by government institutions or government securities</i>	6,595	561,935
<i>Guarantees issued by financial institutions</i>	52,859	505,692
<i>Other collateral (pledge on assets, corporate and personal guarantees, promissory notes)</i>	6,878,752	4,605,226
Unsecured loans	14,644,360	9,348,975
Total performing loans and receivables	24,204,776	17,307,805

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28. Financial risk management (continued)

(b) Credit risk (continued)

Collateral policy (continued)

Non-cash loans	31 December 2021	31 December 2020
Secured loans:		
<i>Secured by mortgages</i>	257,501	188,852
<i>Secured by cash collateral</i>	293,849	182,428
<i>Guarantees issued by financial institutions</i>	734	1,187
<i>Other collateral (pledge on assets, corporate and personal guarantees, promissory notes)</i>	698,172	489,953
Unsecured loans	7,498,014	5,688,946
Total non-cash loans	8,748,270	6,551,366

An estimate of the fair value of collaterals held against non-performing loans and receivables is as follows:

	31 December 2021	31 December 2020
Mortgages	508,400	593,686
Pledge on automobile	8,965	7,574
Total	517,365	601,260

Sectorial and geographical concentration of impaired loans

The Bank and its subsidiaries monitor concentrations of credit risk by sector and by geographic location. An analysis of concentrations of non-performing loans is shown below:

	31 December 2021	31 December 2020
Service sector	468,188	467,672
Construction	369,733	376,478
Agriculture and stockbreeding	125,997	173,723
Textile	42,937	57,651
Consumer loans	114,080	149,136
Food	51,210	49,765
Metal and metal products	16,220	9,835
Durable consumption	47,263	53,045
Others	29,243	13,886
Total non-performing loans and receivables	1,264,871	1,351,191

	31 December 2021	31 December 2020
Turkey	1,213,370	1,321,777
Netherlands	42,874	24,828
Switzerland	8,627	4,586
Total non-performing loans and receivables	1,264,871	1,351,191

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28. Financial risk management (continued)

(b) Credit risk (continued)

Sectorial break down of cash and non-cash loans

	31 December 2021				31 December 2020			
	Cash	Cash (%)	Non cash	Non-cash (%)	Cash	Cash (%)	Non-cash	Non-cash (%)
Agriculture	804,426	3.17	69,481	0.79	684,579	3.86	30,753	0.47
<i>Farming and stockbreeding</i>	638,925	2.52	37,826	0.43	639,908	3.61	21,253	0.32
<i>Forestry</i>	26,829	0.10	17,850	0.20	30,487	0.17	6,328	0.10
<i>Fishing</i>	138,672	0.55	13,805	0.16	14,184	0.08	3,172	0.05
Industry	8,748,467	34.45	3,296,592	37.68	5,090,648	28.74	2,468,501	37.68
<i>Mining and quarrying</i>	536,108	2.11	226,306	2.59	216,283	1.22	16,223	0.25
<i>Manufacturing</i>	7,951,540	31.31	2,956,420	33.79	4,719,934	26.65	2,411,072	36.80
<i>Electricity, gas, water</i>	260,819	1.03	113,866	1.30	154,431	0.87	41,206	0.63
Construction	1,695,846	6.68	1,280,362	14.64	2,074,601	11.71	1,223,709	18.68
Services	13,826,492	54.45	3,833,182	43.82	9,475,226	53.49	2,667,706	40.72
<i>Wholesale and retail trade</i>	5,637,824	22.20	1,436,190	16.42	3,774,353	21.31	1,024,846	15.64
<i>Hotel and restaurant services</i>	235,277	0.93	48,529	0.56	254,183	1.44	35,856	0.55
<i>Transportation and communication</i>	1,138,588	4.48	190,496	2.18	830,960	4.69	174,913	2.67
<i>Financial institution</i>	5,839,674	23.00	1,983,938	22.68	2,987,668	16.86	1,279,867	19.54
<i>Real estate and rent services</i>	169,591	0.67	4,746	0.05	141,564	0.80	13,789	0.21
<i>Professional services</i>	379,297	1.49	941	0.01	979,468	5.53	79,428	1.21
<i>Educational services</i>	23,471	0.09	79,573	0.91	17,943	0.10	2,228	0.03
<i>Health and social services</i>	402,770	1.59	88,769	1.01	489,087	2.76	56,779	0.87
Consumer loans	116,306	0.46	-	-	161,776	0.91	-	-
Credit card	98,971	0.39	-	-	67,509	0.38	-	-
Others	101,670	0.40	268,653	3.07	161,227	0.91	160,697	2.45
Total	25,392,178	100.00	8,748,270	100.00	17,715,566	100.00	6,551,366	100.00

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28. Financial risk management (continued)

(c) Liquidity risk

In order to avoid the liquidity risk, the Group diversifies funding resources as customer deposits and foreign borrowings, considers the maturity mismatch between assets and liabilities and maintains liquid assets to guarantee sufficient liquidity during market fluctuations.

While the Group short term liquidity need is met mainly with deposits, its long term liquidity is provided through foreign funding sources such as syndication and securitization transactions. There are no significant idle liquidity resources.

Liquidity coverage ratio

The Bank makes use of liquidity stress tests in the internal measurement of liquidity risk. In liquidity gap analysis and liquidity stress scenarios, the Bank’s compensation level of net cash outflows which are more likely to happen in short term are presented. Measurements regarding liquidity risk are performed by Risk Management Department and measurement results are reported regularly to performer units responsible of management of the related risk and top management and the Board of Directors.

Liquidity risk may occur as a result of funding long-term assets with short-term resources. Utmost care is taken to maintain the consistency between the maturities of assets and liabilities; strategies are used to acquire funds over longer terms. In order to avoid adversely affecting the Bank's liquidity risk profile on the funding side of concentrations that may occur, deposit and non-deposit debt concentration limits are used in an active way.

Liquidity risk exposure of the bank, depending on the basic strategy of the Bank is consistent with the resulting risk appetite with risk capacity determined within the limits anticipated by the legislation is a key priority.

The Bank, against a reduction in the huge levels may occur in liquidity sources it is essential to have adequate levels free liquid assets that can be sold in any case or pledged. The level of liquidity buffer consisting of liquid assets in question, expressed in liquidity risk limits are determined by the Board of Directors and is set in accordance with the Bank’s liquidity risk tolerance. The Bank's Asset Liability Committee (ALCO) is responsible for determination of the required funding sources and maturities, revising the liquidity situation to determine the appropriate level of liquidity, within the limits approved by the Board of Directors.

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28. Financial risk management (continued)

(c) Liquidity risk (continued)

Liquidity coverage ratio (continued)

Current Period		Total Unweighted Value (average) (*)		Total Weighted Value (average) (*)	
		TL+FC	FC	TL+FC	FC
HIGH QUALITY LIQUIDITY ASSETS					
1	High Quality Liquidity Assets			7,382,315	6,145,026
CASH OUTFLOWS					
2	Retail and Small Business Customers' Deposits	17,496,300	10,096,738	1,614,623	992,730
3	Stable Deposits	2,705,431	224,916	135,258	10,106
4	Less Stable Deposits	14,790,869	9,871,822	1,479,365	982,624
5	Unsecured Fundings besides retail and small business customers' deposits	13,039,188	9,194,161	6,140,288	3,899,460
6	Operational Deposits	-	-	-	-
7	Non-Operational Deposits	12,121,424	8,993,104	5,272,713	3,710,240
8	Other unsecured fundings	917,764	201,057	867,575	189,220
9	Secured Fundings			116,047	116,047
10	Other Cash Outflows	106,841	596,934	106,805	609,195
11	Derivatives cash outflows and collateral outflows	106,841	596,934	106,805	609,195
12	Obligation related to structured financial products	-	-	-	-
13	Commitments related to debts to financial markets and other off-balance sheet obligations	-	-	-	-
14	Other revocable off-balance sheet commitments and contractual obligations	349,973	349,973	17,496	17,496
15	Other irrevocable or conditionally revocable off-balance sheet obligations	7,181,786	3,879,664	749,940	520,112
16	TOTAL CASH OUTFLOWS			8,745,199	6,155,040
CASH INFLOWS					
17	Secured Lending	65,636	-	-	-
18	Unsecured Lending	4,705,641	2,996,122	3,681,594	2,739,571
19	Other Cash Inflows	131,453	787,766	131,460	809,219
20	TOTAL CASH INFLOWS	4,902,730	3,783,888	3,813,054	3,548,790
				Total Adjusted Value	
21	TOTAL HQLA STOCK			7,382,315	6,145,026
22	TOTAL NET CASH OUTFLOW			4,932,146	2,620,247
23	LIQUIDITY COVERAGE RATIO (%)			149.68	234.52

(*) It is the average calculated for the last three months of the consolidated liquidity coverage, calculated by taking a monthly simple arithmetic mean.

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28. Financial risk management (continued)

(c) Liquidity risk (continued)

Liquidity coverage ratio (continued)

Prior Period		Total Unweighted Value (average) (*)		Total Weighted Value (average) (*)	
		TL+FC	FC	TL+FC	FC
HIGH QUALITY LIQUIDITY ASSETS					
1	High Quality Liquidity Assets			4,466,572	3,577,920
CASH OUTFLOWS					
2	Retail and Small Business Customers' Deposits	13,149,203	6,873,061	1,211,728	677,111
3	Stable Deposits	2,063,857	210,871	103,193	10,544
4	Less Stable Deposits	11,085,346	6,662,190	1,108,535	666,567
5	Unsecured fundings besides retail and small business customers' deposits	8,680,883	5,255,037	4,018,236	2,283,399
6	Operational Deposits	-	-	-	-
7	Non-Operational Deposits	8,078,818	5,055,370	3,462,912	2,083,732
8	Other unsecured fundings	602,065	199,667	555,324	199,667
9	Secured Fundings			81,413	81,413
10	Other Cash Outflows	56,992	416,464	56,992	416,464
11	Derivatives cash outflows and collateral outflows	56,992	416,464	56,992	416,464
12	Obligation related to structured financial products	-	-	-	-
13	Commitments related to debts to financial markets and other off-balance sheet obligations	-	-	-	-
14	Other revocable off-balance sheet commitments and contractual obligations	113,723	113,723	5,686	5,686
15	Other irrevocable or conditionally revocable off-balance sheet obligations	5,352,523	2,340,040	531,372	339,544
16	TOTAL CASH OUTFLOWS			5,905,427	3,803,617
CASH INFLOWS					
17	Secured Lending	151,519	83,876	-	-
18	Unsecured Lending	3,706,090	2,359,084	2,906,940	2,126,430
19	Other Cash Inflows	80,105	1,861,784	80,105	1,861,784
20	TOTAL CASH INFLOWS	3,937,714	4,304,744	2,987,045	3,988,214
				Total Adjusted Value	
21	TOTAL HQLA STOCK			4,466,572	3,577,920
22	TOTAL NET CASH OUTFLOW			2,918,382	952,890
23	LIQUIDITY COVERAGE RATIO (%)			153.05	375.48

(*) It is the average calculated for the last three months of the consolidated liquidity coverage, calculated by taking a monthly simple arithmetic mean.

	Current period		Prior period	
	TL+FC	FC	TL+FC	FC
Lowest related month	121.50%	175.72%	117.88%	307.92%
	30 November 2021	16 December 2021	30 October 2020	12 October 2020
Highest related month	195.11%	377.26%	188.71%	506.59%
	29 December 2021	29 December 2021	02 December 2020	27 November 2020

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28. Financial risk management *(continued)*

(c) Liquidity risk *(continued)*

Liquidity coverage ratio *(continued)*

Liquidity coverage ratio aims to ensure banks maintain adequate levels of high quality liquid assets against net cash outflows. High quality liquid assets are mainly cash and cash equivalents, reserve requirements maintained at CBRT and marketable securities that are not subject to repurchase agreements or not given as collateral. 76% of the Bank’s high quality assets are cash & cash equivalents and reserve requirements maintained at CBRT; 16% are marketable securities and 8% are cash. Besides, time deposits, derivatives, loans up to 1 month and non-cash loans are balance sheet accounts that are significant on the ratio. 74% of cash outflows are unsecured funding, 8% are secured funding and 18% are off-balance items.

Residual contractual maturities of monetary liabilities

31 December 2021	Carrying amount	Gross nominal outflow	Demand	Less than one month	1-3 months	3 months to 1 year	1-5 years	More than 5 years
Deposits from banks	103,014	103,395	126	103,269	-	-	-	-
Deposits from customers	33,299,343	33,476,687	6,109,627	18,182,023	7,074,144	1,293,650	791,822	25,421
Obligations under repurchase agreements	1,957,299	1,961,603	-	1,511,637	141,848	308,118	-	-
Funds borrowed	1,620,269	1,626,895	-	288,032	416,955	386,258	535,650	-
Total	36,979,925	37,168,580	6,109,753	20,084,961	7,632,947	1,988,026	1,327,472	25,421

31 December 2020	Carrying amount	Gross nominal outflow	Demand	Less than one month	1-3 months	3 months to 1 year	1-5 years	More than 5 years
Deposits from banks	119,876	170,518	78	170,440	-	-	-	-
Deposits from customers	19,653,723	19,818,174	3,108,502	10,310,168	5,033,448	778,815	561,941	25,300
Obligations under repurchase agreements	4,608,113	4,622,559	-	4,334,049	168,554	119,956	-	-
Funds borrowed	1,319,223	1,324,585	-	446,957	247,690	438,062	191,876	-
Total	25,700,935	25,935,836	3,108,580	15,261,614	5,449,692	1,336,833	753,817	25,300

The previous table shows the undiscounted cash flows on the Group’s monetary liabilities on the basis of their earliest possible contractual maturity. The Group’s expected cash flows on these instruments vary significantly from this analysis.

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28. Financial risk management (continued)

(c) Liquidity risk (continued)

The table below analyses contractual maturities of derivative transactions:

	31 December 2021								
	Fair value assets	Fair value liabilities	Notional amount in Turkish Lira equivalent	Up to 1 month	1 to 3 months	3 to 6 months	6 to 12 months	1 to 5 years	More than 5 years
<i>Derivatives financial instruments held for trading purpose:</i>									
Forward purchase contract	97,691	183,741	2,274,249	1,288,531	707,073	211,839	66,806	-	-
Forward sale contract			2,328,330	1,309,860	753,675	214,414	50,381	-	-
Currency swap purchase	130,076	171,239	6,864,959	4,216,525	709,208	511,171	-	1,282,370	145,685
Currency swap sale			6,899,492	4,120,522	742,774	527,960	-	1,368,438	139,798
Interest swap purchase	42,303	8,522	3,495,000	125,000	300,000	1,300,000	1,610,000	160,000	-
Interest swap sale			3,495,000	125,000	300,000	1,300,000	1,610,000	160,000	-
Put option purchase	889,608	199,125	5,249,807	582,101	1,065,301	999,823	2,602,582	-	-
Put option sale			5,358,815	427,187	968,558	851,272	3,111,798	-	-
Total	1,159,678	562,627	35,965,652	12,194,726	5,546,589	5,916,479	9,051,567	2,970,808	285,483
31 December 2020									
	Fair value assets	Fair value liabilities	Notional amount in Turkish Lira equivalent	Up to 1 month	1 to 3 months	3 to 6 months	6 to 12 months	1 to 5 years	More than 5 years
<i>Derivatives financial instruments held for trading purpose:</i>									
Forward purchase contract	28,984	11,680	992,326	515,627	209,880	139,578	127,241	-	-
Forward sale contract			953,777	512,377	195,719	133,573	112,108	-	-
Currency swap purchase	83,579	147,885	3,509,696	1,884,642	989,677	171,387	335,107	128,883	-
Currency swap sale			3,512,442	1,906,292	1,015,070	162,985	313,395	114,700	-
Interest swap purchase	15,572	5,070	2,233,645	54,750	1,177,252	415,582	145,582	234,506	205,973
Interest swap sale			2,288,978	62,097	1,225,238	415,582	145,582	234,506	205,973
Put option purchase	33,110	37,857	1,045,116	203,017	314,485	79,486	448,128	-	-
Put option sale			1,127,298	201,898	309,581	82,656	533,163	-	-
Total	161,245	202,492	15,663,278	5,340,700	5,436,902	1,600,829	2,160,306	712,595	411,946

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28. Financial risk management *(continued)*

(d) 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 Group’s income or the value of its holdings of financial instruments. The objective of market risk management is to manage and control market risk exposures within acceptable parameters, while optimizing the return on risk.

Management of market risk

The Group separates its exposure to market risk between trading and non-trading portfolios. Trading portfolios mainly are held by the Treasury Department, and include positions arising from market making and proprietary position taking, together with financial assets and liabilities that are managed on a fair value basis.

Exposure to market risk – trading portfolios

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

The principal tool used to measure and control market risk exposure within the Bank’s trading portfolios is Value at Risk (VaR). The VaR of a trading portfolio is the estimated loss that will arise on the portfolio over a specified period of time (holding period) from an adverse market movement with a specified probability (confidence level). The VaR model used by the Group is based upon a 99 percent confidence level and assumes a 1 day holding period. The VaR model used is based mainly on Monte Carlo simulation. Taking account of market data from the previous 252 days, and observed relationships between different markets and prices, the model generates a wide range of plausible future scenarios and stress tests for market price movements. The VaR model used is based on and Monte Carlo simulation with using with Nelson Siegel method for yield curve and GARCH method for volatility. The VaR analysis of the Bank are not reported outside and used only by the top management.

The consolidated value at market risk as of 31 December 2021 calculated as per the statutory consolidated financial statements prepared for the BRSA reporting purposes within the scope of “Regulation on Measurement and Assessment of Capital Adequacy Ratios of Banks” published in Official Gazette no. 29511 dated 23 October 2015 is as follows:

		RWA
1	Indirect (Cash) Products	
2	Interest Rate Risk (general and specific)	1,669,125
3	Stock risk (general and specific)	60,400
4	Currency risk	357,213
	Commodity risk	-
5	Options	
6	Simplified Approach	-
7	Delta-Plus Method	146,200
8	Scenario Approach	-
9	Securitization	-
	Total	2,232,938

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28. Financial risk management (continued)

(d) Market risk (continued)

Exposure to interest rate risk – non-trading portfolios

The principal risk to which non-trading portfolios are exposed is the risk of loss from fluctuations in the future cash flows or fair values of financial instrument because of a change in market interest rates. Interest rate risk is managed principally through monitoring interest rate gaps and by having pre-approved limits for repricing bands. The ALCO is the monitoring body for compliance with these limits and is assisted by Risk Management in its day-to-day monitoring activities. A summary of the Group's interest rate gap position is as follows:

31 December 2021	Less than one month	1-3 months	3-12 months	1 -5 years	Over 5 years	Non-interest	Carrying amount
Cash and balances with the Central Bank	3,957,221	-	-	-	-	2,127,754	6,084,975
Loans and advances to banks and other financial institutions	2,428,032	-	-	-	-	2,330,773	4,758,805
Receivables from reverse repurchase transactions	-	-	-	-	-	-	-
Financial assets at FVTPL	-	512	2,042	3,252	5,379	-	11,185
Financial assets at FVOCI	-	-	367,942	183,211	788,198	37,854	1,377,205
Loans and receivables	3,196,512	4,783,394	13,496,200	2,846,845	610,905	458,322	25,392,178
Financial assets measured at amortised cost	546,239	95,069	39,086	2,220,793	353,354	-	3,254,541
Other assets	1,191,286	224	36,850	-	363	1,280,308	2,509,031
Total assets	11,319,290	4,879,199	13,942,120	5,254,101	1,758,199	6,235,011	43,387,920
Deposits from banks	102,590	298	-	-	-	126	103,014
Deposits from customers	19,223,032	5,751,196	1,408,264	782,417	24,807	6,109,627	33,299,343
Obligations under repurchase agreements and interbank money market borrowings	1,838,764	222,885	145,507	-	-	-	2,207,156
Debt securities issued	-	-	-	-	-	-	-
Funds borrowed	572,954	173,336	338,153	535,798	-	28	1,620,269
Other liabilities, provisions and equity	470,013	607	19,902	41,160	38,295	5,588,161	6,158,138
Total liabilities	22,207,353	6,148,322	1,911,826	1,359,375	63,102	11,697,942	43,387,920
Net	(10,888,063)	(1,269,123)	12,030,294	3,894,726	1,695,097	(5,462,931)	-
31 December 2020	Less than one month	1-3 months	3-12 months	1 -5 years	Over 5 years	Non-interest	Carrying amount
Cash and balances with the Central Bank	3	341,420	-	-	-	2,188,537	2,529,960
Loans and advances to banks and other financial institutions	1,599,447	-	-	-	-	465,388	2,064,835
Receivables from reverse repurchase transactions	209,022	24,100	37,011	-	-	-	270,133
Financial assets at FVTPL	-	-	67,706	4,297	2,382	-	74,385
Financial assets at FVOCI	-	-	1,327,006	253,249	555,736	24,703	2,160,694
Loans and receivables	1,924,537	3,319,478	9,046,436	2,800,536	124,686	499,894	17,715,567
Financial assets measured at amortised cost	-	413,224	1,105,388	2,614,721	90,921	-	4,224,254
Other assets	162,962	152	4,999	-	263	1,071,685	1,240,061
Total assets	3,895,971	4,098,374	11,588,546	5,672,803	773,988	4,250,207	30,279,889
Deposits from banks	74,193	45,605	-	-	-	78	119,876
Deposits from customers	2,230,623	13,195,512	821,697	739,065	24,589	2,642,237	19,653,723
Obligations under repurchase agreements and interbank money market borrowings	4,451,453	198,300	209,355	-	-	-	4,859,108
Debt securities issued	-	-	-	-	-	-	-
Funds borrowed	543,142	229,884	354,499	191,564	-	134	1,319,223
Other liabilities, provisions and equity	175,228	1,769	11,404	34,598	41,734	4,063,226	4,327,959
Total liabilities	7,474,639	13,671,070	1,396,955	965,227	66,323	6,705,675	30,279,889
Net	(3,578,668)	(9,572,696)	10,191,591	4,707,576	707,665	(2,455,468)	-

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28. Financial risk management *(continued)*

(d) Market risk *(continued)*

The following table indicates the effective interest rates by major currencies for the major components of the consolidated statement of financial position for 2021 and 2020:

31 December 2021	Euro %	USD %	JPY %	TL %
Cash and balances with Central Bank	-	-	-	12.50
Loans and advances to banks and other financial institutions	-	0.01	-	-
Financial assets at FVTPL	4.98	7.01	-	20.02
Money market placements	0.09	-	-	-
Financial assets at FVOCI	(0.38)	5.31	-	-
Loans and receivables to customers	2.58	3.42	-	24.82
Financial assets measured at amortised cost	1.00	5.21	-	15.95
Deposits from banks	-	-	-	14.91
Deposits from customers	0.40	0.72	-	16.79
Debt securities issued	-	-	-	-
Money market debts	(0.20)	1.05	-	14.00
Funds borrowed	(0.15)	2.64	-	15.95
31 December 2020	Euro %	USD %	JPY %	TL %
Cash and balances with Central Bank	-	-	-	5.00
Loans and advances to banks and other financial institutions	(0.49)	0.02	-	16.34
Financial assets at FVTPL	1.86	4.55	-	15.64
Money market placements	0.97	0.26	-	15.31
Financial assets at FVOCI	0.59	4.96	-	16.07
Loans and receivables to customers	3.06	3.92	-	12.34
Financial assets measured at amortised cost	2.56	5.59	-	5.64
Deposits from banks	-	0.20	-	13.51
Deposits from customers	0.71	1.43	-	16.29
Debt securities issued	-	-	-	-
Money market debts	0.05	1.34	-	14.45
Funds borrowed	0.03	1.29	-	11.21

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28. Financial risk management *(continued)*

(d) Market risk *(continued)*

Interest rate sensitivity of the trading and non-trading portfolios

Interest rate risk in the banking book is evaluated considering the repricing risk, yield curve risk, basis risk and optionality, measured in compliance with the international standards and managed by risk mitigation through limits and hedging.

The interest rate sensitivity of assets, liabilities and off balance-sheet items are evaluated at the weekly Asset-Liability Committee meetings considering also the market developments.

The measurement process of interest rate risk resulting from banking book is established and managed by the Bank on a bank-only basis to include the interest rate positions defined as banking book and to consider the relevant repricing and maturity data.

Duration gaps, gaps by maturity buckets and sensitivity analysis are used in monitoring of repricing risk resulting from maturity mismatch. The duration gap and sensitivity analysis are carried out every two weeks period.

In the duration gap analysis, the present values of interest-rate-sensitive asset and liability items are calculated using yield curves developed from market interest rates. In case of instruments with no maturities assigned, the maturity is determined as per interest rate fixing periods and customer behaviours. Such results are supported by sensitivity and scenario analysis applied periodically for possible instabilities in the markets.

The interest rate risk resulted from banking book is measured legally as per the “Regulation on Measurement and Evaluation of Interest Rate Risk Resulted from Banking Book as per Standard Shock Method” published in the Official Gazette no. 28034 dated 23 August 2011, and the legal limit as per this measurement is monitored and reported monthly. The capital level is maintained considering the interest rate risk resulted from the banking book.

The interest rate risk on the interest-rate-sensitive financial instruments of the trading portfolio is evaluated as part of the market risk.

As of 31 December 2021, the economic value differences resulted from interest rate instabilities calculated on a bank-only basis for the banking book according to the relevant legislation as per the standard shock method are as follows;

Type of currency	Shocks applied (+/- basis points)	Gains/losses	Gains/equity-Losses/equity
TL	(+) 500 bps	(107,137)	(%2.38)
TL	(-) 400 bps	92,796	%2.06
USD	(+) 200 bps	(2,990)	(%0.07)
USD	(-) 200 bps	2,732	%0.06
EUR	(+) 200 bps	10,826	%0.24
EUR	(-) 200 bps	2,909	%0.06
Total (of negative shocks)		98,437	%2.18
Total (of positive shocks)		(99,301)	(%2.20)

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28. Financial risk management *(continued)*

(d) Market risk *(continued)*

Currency risk

Currency risk arises when an entity’s equity is under threat as a result of exchange rate fluctuations. Naturally, a bank doing business in multiple currencies would be exposed to currency risk unless these risks are properly hedged. Any sizeable transaction that would be causing currency risk is immediately hedged with a banking counterpart, or else smaller transactions are gathered until they form a sizeable amount for hedging.

Foreign exchange gains and losses arising from foreign currency transactions are recorded at transaction dates. At the end of the periods, foreign currency assets and liabilities evaluated with the Bank’s spot purchase rates and the differences are recorded as foreign exchange gain or loss in profit or loss except for foreign exchange gain/loss arising from the conversion of the net investments in subsidiaries in foreign countries into TL.

The Bank takes on exposure to effects of fluctuations in the prevailing foreign currency exchange rates on its financial position and cash flows. The Board of Directors sets limit on the level of exposure by currency and in total for both overnight and intra-day positions, which are monitored daily. The Group’s exposure to foreign currency exchange rate risk at 31 December 2021 and 2020, on the basis of the Group’s assets and liabilities at carrying amounts, categorised by currency, is shown in the following table.

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28. Financial risk management *(continued)*

(d) Market risk *(continued)*

Currency risk *(continued)*

As at 31 December 2021	USD	Euro	Other currencies	Total
Assets:				
Cash and balances with the Central Bank	2,868,990	1,323,748	719,119	4,911,857
Loans and advances to banks and other financial institutions	1,904,888	2,523,388	123,540	4,551,816
Receivables from reverse repo transactions	7,000	157,929	-	164,929
Financial assets at FVOCI	1,136,612	232,774	-	1,369,386
Financial assets at FVTPL	76,251	805	-	77,056
Financial assets measured at amortised cost	393,017	543,580	-	936,597
Loans and receivables	5,816,934	4,555,263	339,288	10,711,485
Property and equipment	117	7,385	-	7,502
Other assets	27,779	19,307	2,283	49,369
Total assets	12,231,588	9,364,179	1,184,230	22,779,997
Liabilities:				
Deposits from other banks	7	98	13	118
Deposits from customers	13,963,358	8,523,845	1,032,946	23,520,149
Other money market deposits	563,226	114,186	21,546	698,958
Funds borrowed	20,754	925,574	-	946,328
Obligations from leasing transactions	117	5,600	-	5,717
Other liabilities and provisions	74,546	28,076	390	103,012
Total liabilities	14,622,008	9,597,379	1,054,895	25,274,282
Net position on the consolidated statement of financial position				
	(2,390,420)	(233,200)	129,335	(2,494,285)
Off-balance sheet position:				
Net notional amount of derivatives	2,987,678	(274,187)	(127,761)	2,585,730
Net position	597,258	(507,387)	1,574	91,445

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28. Financial risk management *(continued)*

(d) Market risk *(continued)*

Currency risk *(continued)*

As at 31 December 2020	USD	Euro	Other currencies	Total
Assets:				
Cash and balances with the Central Bank	1,279,941	691,347	163,139	2,134,427
Loans and advances to banks and other financial institutions	445,608	1,197,045	182,038	1,824,691
Receivables from reverse repo transactions	18,616	68,645	-	87,261
Financial assets at FVOCI	742,458	121,230	-	863,688
Financial assets at FVTPL	90,302	4,374	-	94,676
Financial assets measured at amortised cost	311,808	300,455	-	612,263
Loans and receivables	2,468,205	2,254,442	13,834	4,736,481
Property and equipment	122	4,565	-	4,687
Other assets	40,890	54,724	828	96,442
Total assets	5,397,950	4,696,827	359,839	10,454,616
Liabilities:				
Deposits from other banks	74,198	59	8	74,265
Deposits from customers	5,656,811	4,054,394	457,707	10,168,912
Other money market deposits	406,382	214,540	19,773	640,695
Funds borrowed	341,334	546,173	-	887,507
Obligations from leasing transactions	708	4,337	-	5,045
Other liabilities and provisions	27,109	7,306	87	34,502
Total liabilities	6,506,542	4,826,809	477,575	11,810,926
Net position on the consolidated statement of financial position				
	(1,108,592)	(129,982)	(117,736)	(1,356,310)
Off-balance sheet position:				
Net notional amount of derivatives	1,283,010	347,385	120,965	1,751,360
Net position	174,418	217,403	3,229	395,050

For the purposes of the evaluation of the table above, the figures represent the TL equivalent of the related hard currencies.

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28. Financial risk management *(continued)*

(d) Market risk *(continued)*

Exposure to currency risk sensitivity analysis

A 10 percent devaluation of the TL against the following currencies as at 31 December 2021 and 2020 would have increased/(decreased) equity and profit or loss (without tax effects) by the amounts shown below. This analysis assumes that all other variables, in particular interest rates, remain constant.

	31 December 2021		31 December 2020	
	Profit or loss	Equity (*)	Profit or loss	Equity (*)
USD	69,461	59,726	17,338	17,442
EUR	(50,904)	(50,739)	21,792	21,740
Other currencies	157	157	323	323
Total, net	18,714	9,144	39,453	39,505

(*) Equity effect also includes profit or loss effect of 10% devaluation of TL against related currencies.

Fair value information

The estimated fair values of financial instruments have been determined using available market information by the Group, and where it exists, appropriate valuation methodologies. However, during financial crisis, judgment is necessary requirement to interpret market data to determine the estimated fair value.

Management has estimated that the fair value of certain financial assets and liabilities are not materially different than their recorded values except for those of loans and advances to customers and investment securities. These financial assets and liabilities include loans and advances to banks, obligations under repurchase agreements, deposits from banks, and other short-term assets and liabilities that are of a contractual nature. Management believes that the carrying amount of these particular financial assets and liabilities approximates their fair value, partially due to the fact that it is practice to renegotiate interest rates to reflect current market conditions.

Fair values and carrying amounts of loans and receivables and financial assets measured at amortised cost as follows:

	31 December 2021		31 December 2020	
	Carrying amount	Fair value	Carrying amount	Fair value
Loans and receivables	24,925,623	24,295,487	17,287,101	16,584,931
Financial assets measured at amortised cost - investment securities	3,254,541	3,258,443	4,224,730	4,235,220

Fair values of financial assets measured at amortised cost are determined as Level 1 and fair values of loans and receivables are determined as Level 2.

Fair values of financial assets measured at amortised cost are derived from market prices or in case of absence of such prices they are derived from prices of other marketable securities, whose interest rate, maturity date and other conditions are similar to securities held.

Fair values of long-term fixed interest rate loans are calculated by discounting cash flows with current market interest rates. For the loans with floating interest rate and short term loans with fixed interest rate, carrying value also represents fair value.

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28. Financial risk management *(continued)*

(d) Market risk *(continued)*

Fair value information *(continued)*

IFRS 7 – *Financial Instruments* requires the classification of fair value measurements into a fair value hierarchy by reference to the observability and significance of the inputs used in measuring fair value of financial instruments measured at fair value to be disclosed. This classification basically relies on whether the relevant inputs are observable or not.

Classification of fair value measurement

Observable inputs refer to the use of market data obtained from independent sources, whereas unobservable inputs refer to the use of predictions and assumptions about the market made by the Bank. This distinction brings about a fair value measurement classification generally as follows:

Level 1: Fair value measurements using quoted prices (unadjusted) in active markets for identical assets or liabilities;

Level 2: Fair value measurements using inputs other than quoted prices included within Level 1 that are observable for the asset or liability, either directly (as prices) or indirectly (derived from prices).

Level 3: Fair value measurements using inputs for the assets or liability that are not based on observable market data (unobservable inputs).

Classification requires using observable market data if possible.

	31 December 2021			Total
	Level 1	Level 2	Level 3	
Financial assets at fair value through profit or loss:				
Financial assets at fair value:				
Debt instruments	10,730	455	-	11,185
Loans at fair value through profit or loss	-	-	66,383	66,383
Derivative financial assets held for trading	-	1,159,776	-	1,159,776
Financial assets at FVOCI				
Debt instruments issued by Turkish government	1,339,351	-	-	1,339,351
Equity securities	-	30,035	7,819	37,854
Other	-	-	-	-
Total financial assets	1,350,081	1,190,266	74,202	2,614,549
Financial liabilities at fair value through profit or loss:				
Derivative financial liabilities held for trading	-	566,422	-	566,422
Total financial liabilities	-	566,422	-	566,422

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28. Financial risk management *(continued)*

(d) Market risk *(continued)*

Classification of fair value measurement *(continued)*

	31 December 2020			Total
	Level 1	Level 2	Level 3	
Financial assets at fair value through profit or loss:				
Financial assets at fair value:				
Debt instruments	74,379	6	-	74,385
Loans at fair value through profit or loss	-	-	85,708	85,708
Derivative financial assets held for trading	-	161,245	-	161,245
Financial assets at FVOCI				
Debt instruments issued by Turkish government	2,048,416	-	-	2,048,416
Equity securities	-	16,885	7,819	24,704
Other	-	87,574	-	87,574
Total financial assets	2,122,795	265,710	93,527	2,482,032
Financial liabilities at fair value through profit or loss:				
Derivative financial liabilities held for trading	-	202,492	-	202,492
Total financial liabilities	-	202,492	-	202,492

As of 31 December 2021, the revaluation model effect, net of deferred tax, for real estates under property and equipment amounting to TL 70,217 was accounted under shareholders’ equity (2020: TL 5,400).

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28. Financial risk management *(continued)*

(d) Market risk *(continued)*

Level 3 fair value measurements

The following table shows a reconciliation from the beginning balances to the ending balances for fair value measurements in Level 3 of the fair value hierarchy.

	Loans at fair value through profit or loss	Equity securities at FVOCI	Total
Balance at 1 January 2021	85,708	7,819	93,527
Revaluation	(19,325)	-	(19,325)
Balance at 31 December 2021	66,383	7,819	74,202

	Loans at fair value through profit or loss	Equity securities at FVOCI	Total
Balance at 1 January 2020	68,940	7,819	76,759
Transfers into Level 3 ^(*)	16,768	-	16,768
Balance at 31 December 2020	85,708	7,819	93,527

^(*) Loans and receivables include the loan granted to the special purpose entity amounting to TL 66,383 (31 December 2020: TL 85,708). The fair value of this loan is determined by the independent valuation company by considering different methodologies (discounted cash flows, peer market multipliers, similar transaction multipliers in the same sector etc.). Valuation techniques considered in the valuation work and any possible changes in the basic assumptions may affect the carrying value of the related asset. Accordingly, the loan is classified as Level 3.

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28. Financial risk management (continued)

(e) Operational risk

Operational risk is the risk of direct or indirect loss arising from a wide variety of causes associated with the Bank’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 Bank’s operations and are faced by all business entities.

The operational risk items in the Bank 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 Bank 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 data and amount of operational losses, the Bank exposed to during its activities is collected and analysed regularly by Risk Management Department and reported to Board of Directors, Auditing Committee and senior management.

The Group calculated the value at operational risk in accordance with the “Computation of Value of Operational Risk” of the circular “Regulation Regarding Measurement and Assessment of Capital Adequacy Ratios of Banks” published in the Official Gazette dated 1 November 2007, using gross profit of the last three years 2018, 2019 and 2020 Value at operational risk is amounting to TL 2,462,619 (31 December 2020: TL 2,175,957).

(f) Capital management – regulatory capital

The BRSA sets and monitors capital requirements for the Bank as a whole. The parent company and individual banking operations are directly supervised by their local regulators. In implementing current capital requirements, the BRSA requires the banks to maintain a prescribed ratio of minimum 8% of total capital to total value at credit, market and operational risks. The Bank and its affiliates’ consolidated regulatory capital is analysed into two tiers:

- Tier 1 capital, which includes paid-in capital, share premium, legal reserves, retained earnings, translation reserve and non-controlling interests after deductions for goodwill and certain cost items.
- Tier 2 capital, which includes qualifying subordinated liabilities, general provisions and the element of the fair value reserve relating to unrealised gain/(loss) on assets classified as financial assets at fair value through other comprehensive income.

Banking operations are categorised as either trading book or banking book, and 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. The Bank’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 Bank and its individually regulated operations have complied with externally imposed capital requirements throughout the year. There have been no material changes in the Bank’s management of capital during the period.

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28. Financial risk management *(continued)*

(f) Capital management – regulatory capital *(continued)*

The capital adequacy ratio is calculated within the scope of the “Regulation on Measurement and Assessment of Capital Adequacy Ratios of Banks (the “Regulation”)”, “Regulation on Credit Risk Mitigation Techniques” and “Regulation on Calculation of Risk Weighted Amounts for Securitisations” published in the Official Gazette no.29511 dated 23 October 2015 and the “Regulation on Equities of Banks” published in the Official Gazette no.28756 dated 5 September 2013. In calculation of capital adequacy ratio, the data prepared from accounting records in compliance with the current legislation are used. Such accounting data is included in the calculation of credit and market risks subsequent to their designation as “trading book” and “banking book” according to the Regulation. The items classified as trading book and the items deducted from the equity are not included in the calculation of credit risk. In the calculation of risk weighted assets, the assets subject to amortisation or impairment, are taken into account on a net basis after being reduced by the related amortisations and provisions. In the calculation of the value at credit risk for the non-cash loans and commitments and the receivables from counterparties in such transactions are weighted after netting with specific provisions that are classified under liabilities and calculated based on the “Regulation on Identification of and Provision against Non-Performing Loans and Other Receivables”. The net amounts are then multiplied by the rates stated in the Article 5 of the Regulation, reduced as per the “Regulation on Credit Risk Mitigation Techniques” and then included in the relevant exposure category defined in the article 6 of the Regulation and weighted as per Appendix-1 of the Regulation.

In the calculation of the value at credit risk for the derivative financial instruments and the credit derivatives classified in banking book, the receivables from counterparties are multiplied by the rates stated in the Appendix-2 of the Regulation, reduced as per the “Regulation on Credit Risk Mitigation Techniques” and then included in the relevant exposure category defined in the article 6 of the Regulation and weighted as per Appendix-1 of the Regulation.

As per the article 5 of the Regulation, the “counterparty credit risk” is calculated for repurchase transactions, securities and commodities borrowing agreements.

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28. Financial risk management (continued)

(f) Capital management – regulatory capital (continued)

The Bank’s and its subsidiaries’ regulatory capital positions on a consolidated basis as of 31 December 2021 and 2020 are as follows:

	31 December 2021	31 December 2020
Tier 1 capital	4,405,237	3,266,520
Tier 2 capital	125,791	96,269
Deductions from capital	(358)	(450)
Total regulatory capital	4,530,670	3,362,339
Risk-weighted assets	24,058,738	19,522,377
Value at market risk	2,232,938	1,331,788
Operational risk	2,462,619	2,175,957
Capital ratios		
Total regulatory capital expressed as a percentage of total risk-weighted assets, value at market risk and operational risk	15.32%	14.18%
Total tier 1 capital expressed as a percentage of risk-weighted assets, value at market risk and operational risk	15.76%	14.60%

29. Events after the reporting period

According to the Law No. 7352 Amending the Tax Procedure Law and the Corporate Tax Law published in the Official Gazette dated 29 January 2022 and numbered 31734, the application of inflation adjustment in the legal books based on the Tax Procedure Law was postponed to 31 December 2023.