(Convenience Translation of Financial Statements and Related Disclosures and Footnotes Originally Issued in Turkish)

ING Bank A.Ş. and Its Financial Subsidiaries

Publicly Announced Consolidated Financial
Statements as of and for the Six-Month Period Ended
30 June 2019 and Independent
Auditors' Review Report

5 August 2019

This report consists 2 pages of "Independent Auditors' Review Report" and 86 pages of consolidated financial statements and its disclosures and footnotes.

Convenience Translation of the Independent Auditors' Review Report Originally Prepared and Issued in Turkish (Note 1.b of Section Three)

REVIEW REPORT ON INTERIM CONSOLIDATED FINANCIAL INFORMATION

To the Board of Directors of ING Bank Anonim Şirketi

Introduction

We have reviewed the consolidated statement of financial position of ING Bank Anonim Şirketi (the "Bank") and its financial subsidiaries (together the "Group") as at 30 June 2019 and the consolidated statements of income, profit or loss and other comprehensive income, changes in equity, cash flows and a summary of significant accounting policies and other explanatory notes to the consolidated financial statements for the six-month-period then ended. The Group Management is responsible for the preparation and fair presentation of consolidated interim financial statements in accordance with the "Regulation on Accounting Applications for Banks and Safeguarding of Documents" published in the Official Gazette no. 26333 dated 1 November 2006, and other regulations on accounting records of Banks published by Banking Regulation and Supervision Agency and circulars and interpretations published by Banking Regulation and Supervision Authority ("BRSA"), and Turkish Accounting Standard 34 "Interim Financial Reporting" for those matters not regulated by BRSA Legislation (together referred as "BRSA Accounting and Reporting Legislation"). Our responsibility is to express a conclusion on these consolidated interim financial statements based on our review.

Scope of review

We conducted our review in accordance with the Standard on Review Engagements ("SRE") 2410, "Limited Review of Interim Financial Information Performed by the Independent Auditor of the Entity". A review of interim financial information consists of making inquiries, primarily of persons responsible for financial reporting process, and applying analytical and other review procedures. A review of interim financial information is substantially less in scope than an independent audit performed in accordance with the Independent Auditing Standards and the objective of which is to express an opinion on the financial statements. Consequently, a review of the interim financial information does not provide assurance that the audit firm will be aware of all significant matters which would have been identified in an audit. Accordingly, we do not express an opinion.

Conclusion

Based on our review, nothing has come to our attention that causes us to believe that the accompanying consolidated financial statements do not present fairly, in all material respects the consolidated financial position of ING Bank Anonim Şirketi and its financial subsidiaries as at 30 June 2019 and its consolidated financial performance and its consolidated cash flows for the six-month-period then ended in accordance with the BRSA Accounting and Reporting Legislation.

Report on other regulatory requirements arising from legislation

Based on our review, nothing has come to our attention that causes us to believe that the interim financial information provided in the accompanying interim activity report included in Section VII, is not consistent, in all material respects, with the reviewed consolidated interim financial statements and explanatory notes.

KPMG Bağımsız Denetim ve Serbest Muhasebeci Mali Müşavirlik Anonim Şirketi A member firm of KPMG International Cooperative

Funda Aslanoğlu, SMMM Partner 5 August 2019 Istanbul, Turkey

Additional paragraph for convenience translation to English:

The accounting principles summarized in Note 3.1, differ from the accounting principles generally accepted in countries in which the accompanying consolidated financial statements are to be distributed and International Financial Reporting Standards ("IFRS"). Accordingly, the accompanying financial statements are not intended to present the financial position and results of operations in accordance with accounting principles generally accepted in such countries of users of the consolidated financial statements and IFRS.

The consolidated financial report of ING Bank A.Ş. prepared as of and for the six-month period ended 30 June 2019

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The six-month consolidated interim financial report includes the following sections in accordance with the "Communiqué on the Financial Statements and Related Disclosures and Footnotes that will be Publicly Announced" as regulated by the Banking Regulation and Supervision Agency.

- General information about the Group
- Consolidated interim financial statements of the Group
- Explanations on accounting policies applied in the related period
- Information on financial structure and risk management of the Group
- Explanations and notes related to consolidated financial statements
- Independent Auditors' review report
- Interim activity report

Investment in associates, joint ventures, direct and indirect subsidiaries whose financial statements have been consolidated in this report are as follows.

Subsidiaries	Investments in associates	Joint ventures
 ING European Financial Services Plc. NG Finansal Kiralama A.Ş. 	None	None

3. ING Faktoring A.Ş.4. ING Menkul Değerler A.Ş.

The accompanying six-month period consolidated interim financial statements and footnotes to these financial statements which are expressed, unless otherwise stated, in **thousands of Turkish Lira** (TL), have been prepared based on the accounting books of the Bank in accordance with the Regulation on Accounting Applications for Banks and Safeguarding of Documents, Turkish Accounting Standards, Turkish Financial Reporting Standards, relating appendices and interpretations on these, and are independently reviewed.

John T. Mc CARTHY Chairman of the Board	Pinar ABAY I President and CEO	K. Atıl ÖZUS CFO	M. Gökçe ÇAKIT Financial Reporting and Tax Director
	M. Semra KURAN Chairman of the Audit Committee	Adrianus J. A. K Audit Committee M	

Contact information of the personnel in charge of addressing guestions regarding this financial report:

Name-Surname/Title : M. Gökçe ÇAKIT / Director

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ING Bank A.Ş. and its Financial Subsidiaries

Notes to consolidated financial statements as of and for the six-month period ended 30 June 2019 (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

Section one

General information

I. History of the Parent Bank including its incorporation date, initial legal status, amendments to legal status

The foundations of ING Bank A.Ş. ("The Parent Bank") were laid in 1984 by the establishment of "The First National Bank of Boston Istanbul Branch" and the current structure has been formed with the below mergers and takeovers. The establishment and historical developments of the Parent Bank are explained below:

"The First National Bank of Boston Istanbul Branch" was established in 1984. In 1990, "The First National Bank of Boston A.Ş." was established to accept deposits and carry out banking transactions, and the Articles of Association of the Bank were officially registered on 31 October 1990 and published in the Turkish Trade Registry Gazette on 5 November 1990. Upon the establishment of the Bank and permission to accept deposits, the assets and liabilities in the balance sheet of "The First National Bank of Boston Istanbul Branch" were transferred to the Bank.

The title of the Bank which was operating as a Turkish Bank with four shareholders including Ordu Yardımlaşma Kurumu ("OYAK"), was changed as "Türk Boston Bank A.Ş." in 1991; and OYAK purchased all other shares and became the sole owner of the Bank in 1993. On 10 May 1996, the title of "Türk Boston Bank A.Ş." was changed as "Oyak Bank A.Ş.".

On the other hand, on 22 December 1999, upon a Council of Ministers Decree, the shareholding rights, management and supervision of Sümerbank A.Ş. except for its dividend rights were transferred to Savings Deposit Insurance Fund ("the SDIF") as per the third and fourth paragraphs of Article 14 of the Banking Law. In 2001, the SDIF decided to merge the assets and liabilities of the banks, namely Egebank A.Ş., Türkiye Tütüncüler Bankası Yaşarbank A.Ş., Yurt Ticaret ve Kredi Bankası A.Ş., Bank Kapital A.Ş. and Ulusal Bank T.A.Ş. that have been formerly transferred to the SDIF, into Sümerbank A.Ş.

According to a share transfer agreement executed between the SDIF and OYAK on 9 August 2001, all the shares constituting the capital of Sümerbank A.Ş. whose shares were transferred to the SDIF; were transferred to OYAK by the SDIF. As of 11 January 2002, it was resolved that Sümerbank A.Ş. would settle all its accounts and merge with the Parent Bank and continue its banking operations under the Parent Bank. The merger through transfer was performed on 11 January 2002 upon the approval of the Banking Regulation and Supervision Agency ("BRSA").

In accordance with the permissions of the Competition Board with the decree number 07-69/856-324 dated 6 September 2007 and of the BRSA with the decree number 2416 dated 12 December 2007; the transfer of 1,074,098,150 shares of the Parent Bank that represent the total capital which belongs to OYAK in amount of TL 1,074,098 to ING Bank N.V as of 24 December 2007 has been approved by the Board of Directors decision numbered 55/1 and dated 24 December 2007 and the share transfer has been recorded in Shareholders Stock Register as of the same date. It has been decided to change the title of the Parent Bank from "Oyak Bank A.Ş." to "ING Bank A.Ş." effective from 7 July 2008. The Articles of Association of the Parent Bank has been changed with the Extraordinary General Meeting dated 26 June 2014 in accordance with Turkish Trade Art numbered 6102 and published in Turkish Trade Registry Gazette numbered 8608 and dated 9 July 2014.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to consolidated financial statements as of and for the six-month period ended 30 June 2019 (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

II. The Parent Bank's shareholder structure, management and internal audit, direct and indirect shareholders, change in shareholder structure during the year and information on its risk group

The main shareholders and capital structure as of 30 June 2019 and 31 December 2018 are as follows:

	С	urrent period		Prior period
	Share amount Full TL	Share percentage	Share amount Full TL	Share percentage
ING Bank N.V. Other shareholders total	3,486,267,793 4	100.00	3,486,267,793 4	100.00
Total	3,486,267,797	100.00	3,486,267,797	100.00

As of 30 June 2019, the Parent Bank's paid-in capital consists of 3,486,267,797 shares with a nominal value of TL 1 (Full TL) each.

The Parent Bank's paid-in capital is TL 3,486,268 as of 30 June 2019 and ING Bank N.V. has full control over the Parent Bank's capital.

Other shareholders total represent the total shares of Chairman of the Board John T. Mc Carthy, Vice Chairman of the Board Adrianus J. A. Kas, the members of the Board A. Canan Ediboğlu and Marco Bragadin with a nominal value of TL 1 (Full TL) each.

Mehmet Sırrı Erkan's share with a nominal value of TL 1 (full TL) was transferred to Marco Bragadin on 20 February 2019.

Vice chairman of the Board Mehmet Sırrı Erkan; whose term of duty has expired, has resigned from his duty as of 21 March 2019.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to consolidated financial statements as of and for the six-month period ended 30 June 2019 (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

III. Information on the Parent Bank's board of directors chairman and members, audit committee members, chief executive officer, executive vice presidents and their responsibilities and shareholdings in the Parent Bank

As of 30 June 2019, the Parent Bank's Board of Directors (BOD), Members of Audit Committee and Chief Executive Officer and Executive Vice Presidents are as follows:

Name and Surname	Title	Responsibility area
John T. Mc Carthy	Chairman of the BoD	Legally declared
Adrianus J. A. Kas	Vice Chairman of the BoD and Audit Committee Member	Legally declared
M. Semra Kuran	BoD Member and Chairman of the Audit Committee	Legally declared
A. Canan Ediboğlu	BoD Member	Legally declared
Pinar Abay	Chief Executive Officer and BoD Member	Legally declared
Alper Hakan Yüksel	Executive Vice President	Corporate Banking
Alper İhsan Gökgöz	Executive Vice President	Retail Banking
Ayşegül Akay	Executive Vice President	Financial Institutions and Debt Capital Markets
Bohdan Robert Stepkowski	Executive Vice President	Financial Markets
Gordana Hulina	Executive Vice President	Credits
Günce Çakır	Legal Executive Vice President	Legal Department
Ebru Sönmez Yanık	Executive Vice President	Corporate Customers Sales
İ. Bahadır Şamlı	Executive Vice President	Technology
İhsan Çakır	Executive Vice President	SME and Mid Corporate Banking
İlker Kayseri	Executive Vice President	Treasury
K. Atıl Özus	Executive Vice President	Financial Control and Treasury
Murat Tursun	Chief Audit Executive	Internal Audit
Nermin Güney	Executive Vice President	Financial Risk Management
N. Yücel Ölçer	Executive Vice President	Operation
Öcal Ağar	Executive Vice President	Business Lending and Risk Analytics

As of 31 May 2019, Human Resources Executive Vice President Bahar Özen resigned from her duty and left the Parent Bank.

Öcal Ağar has been appointed as Business Lending and Risk Analytics Executive Vice President per the Board of Directors resolution No. 47 and dated 21 November 2018 after completion of the BRSA process, he started his duty as of 1 January 2019.

The Parent Bank's Ordinary General Assembly meeting was held on 21 March 2019. With the division of duties resolution, no. 18/1, dated 21 March 2019, M. Semra Kuran was elected as Chairman and Adrianus Johannes Antonius Kas was elected as member of the Audit Committee.

Chief Executive Officer and Executive Vice Presidents have no share in the Bank.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to consolidated financial statements as of and for the six-month period ended 30 June 2019 (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

IV. Information on the Parent Bank's qualified shareholders

ING Bank N.V. has full control over the Parent Bank's management with 3,486,267,793 shares and 100% paid-in share.

V. Summary information on the Parent Bank's activities and services

The Parent Bank is principally engaged in all types of banking transactions, accepting deposits and all kinds of legal transactions, activities and operations within banking license within the scope provided by the Banking Law, and all existing and/or future laws, regulations and decree laws and related legislation. The Parent Bank carries out its operations with 223 domestic branches.

The Parent Bank and its subsidiaries ING European Financial Services Plc., ING Finansal Kiralama A.Ş., ING Faktoring A.Ş. and ING Menkul Değerler A.Ş. has been included in the scope of consolidation. The Parent Bank together with its consolidated subsidiaries are referred to as the "Group" in these consolidated financial statements and notes to consolidated financial statements.

VI. Information on application differences between consolidation practices as per the Regulation on Preparation of Consolidated Financial Statements of Banks as per the Turkish Accounting Standards, and entities subject to full or proportional consolidation or deducted from equity or not subject to any of these three methods

Subsidiaries of the Parent Bank are subject to consolidation within the scope of full consolidation, there is no difference consolidation process according to the Turkish Accounting Standards and the Communiqué of the Preparation of Consolidated Financial Statements of Banks in Turkey.

VII. Current or likely actual or legal barriers to immediate transfer of equity or repayment of debts between the Parent Bank and its subsidiaries

None.

Section two

Consolidated financial statements

- I. Consolidated balance sheet (statement of financial position)
- II. Consolidated statement of off-balance sheet items
- III. Consolidated statement of profit or loss
- IV. Consolidated statement of profit or loss and other comprehensive income
- V. Consolidated statement of changes in equity
- VI. Consolidated statement of cash flows

Consolidated balance sheet (statement of financial position) as of 30 June 2019

					Reviewed			Audited
	A 4 -	Note			Current period			Prior period
	Assets	(section			(30/06/2019)			(31/12/2018)
		five)	TL	FC	Total	TL	FC	Total
I.	Financial assets (net)		10,777,209	11,971,715	22,748,924	8,999,453	9,624,383	18,623,836
1.1	Cash and cash equivalents		7,180,541	11,750,785	18,931,326	5,132,989	9,278,715	14,411,704
1.1.1	Cash and balances at Central Bank	(I-1)	815,670	9,569,049	10,384,719	698,875	8,211,362	8,910,237
1.1.2	Banks	(1-3)	22,946	2,181,736	2,204,682	81,826	1,067,353	1,149,179
1.1.3	Money market placements		6,353,870	-	6,353,870	4,360,089	-	4,360,089
1.1.4	Expected credit losses (-) Financial assets at fair value	(I-5)	(11,945)	-	(11,945)	(7,801)	-	(7,801)
1.2	through profit or loss	(1-2)	22,985	43,153	66,138	1,962	26,814	28,776
1.2.1	Government securities	(1-2)	22,919	43,153	66,072	1,914	26,814	28,728
1.2.2	Equity instruments		35	-	35	35	-	35
1.2.3	Other financial assets		31	_	31	13	_	13
	Financial assets at fair value							
	through other comprehensive							
1.3	income	(I-4)	726,955	225	727,180	647,875	208	648,083
1.3.1	Government securities		718,733	-	718,733	639,797	-	639,797
1.3.2	Equity instruments		8,222	225	8,447	8,078	208	8,286
1.3.3	Other financial assets		-	-	-	-	-	-
1.4	Derivative financial assets Derivative financial assets measured		2,846,728	177,552	3,024,280	3,216,627	318,646	3,535,273
1.4.1	at fair value through profit or loss Derivative financial assets measured	(I-2)	873,657	177,547	1,051,204	247,716	318,646	566,362
1.4.2	at fair value through other comprehensive income	(I-11)	1,973,071	5	1,973,076	2,968,911	-	2,968,911
	Financial assets measured at		24 025 000	40 040 000	42 002 000	20 270 000	40.050.200	40 407 050
II.	amortised cost	(1.5)	24,035,000	18,848,890	42,883,890	30,376,699	18,050,360	48,427,059
2.1	Loans Receivables from leasing	(I-5)	24,387,670	17,708,557	42,096,227	30,182,121	16,794,475	46,976,596
2.2	transactions	(I-10)	31,719	939,897	971,616	46,502	1,068,105	1,114,607
2.3	Factoring receivables	(1-10)	260,724	200,436	461,160	567,736	187,780	755,516
	Other financial assets measured at							
2.4	amortised cost	(I-6)	1,195,767	-	1,195,767	1,194,996	-	1,194,996
2.4.1	Government securities		1,195,767	-	1,195,767	1,194,996	-	1,194,996
2.4.2	Other financial assets	(1.5)	-	-	(4 040 000)	(4 C44 CEC)	-	(4 C44 CEC)
2.5 III.	Expected credit losses (-) Non-currents assets or disposal	(I-5)	(1,840,880)	-	(1,840,880)	(1,614,656)	-	(1,614,656)
	groups "held for sale" and "from							
	discontinued operations (net)	(I-16)	660	-	660	660	-	660
3.1	Assets held for sale		660	-	660	660	-	660
3.2	Assets from discontinued operations		-	-	-	-	-	-
IV.	Equity investments		-	-	-	-	-	-
4.1	Investments in associates (net)	(1-7)	-	=	=	-	-	-
	Associates consolidated by using							
4.1.1	equity method		-	-	-	-	-	-
4.1.2 4.2	Unconsolidated associates	(1.0)	=	-	-	-	-	-
4.2 4.2.1	Investments in subsidiaries (net) Unconsolidated financial subsidiaries	(I-8)	-	-	-	-	-	-
	Unconsolidated non-financial		•	-	-	-	-	-
4.2.2	subsidiaries Jointly Controlled Partnerships		-	-	-	-	-	-
4.3	(Joint Ventures) (net)	(1-9)	-	-	-	-	-	-
4.3.1	Joint ventures consolidated by using							
	equity method		=	-	-	-	-	-
4.3.2 V .	Unconsolidated joint ventures Tangible assets (net)	(I-12)	1,038,677	6	1,038,683	684,290	7	684,297
VI.	Intangible assets (net)	(I-12) (I-13)	47,335	-	47,335	40,788	, -	40,788
6.1	Goodwill	(1-13)	-1,JJJ	-	÷1,333	→ 0,700	-	40,700
6.2	Other		47,335	-	47,335	40,788	-	40,788
VII.	Investment property (net)	(I-14)	- ,,,,,,,,	_		-	_	.5,.56
VIII.	Current tax asset	(I-15)	=	-	-	-	-	-
IX.	Deferred tax asset	. ,	4,145	=	4,145	11,293	-	11,293
X.	Other assets (net)	(I-17)	460,508	82,377	542,885	602,285	21,864	624,149

Consolidated balance sheet (statement of financial position) as of 30 June 2019

					Reviewed			Audited
					Current period			Prior period
	Liabilities	Note			(30/06/2019)			(31/12/2018)
		(section five)	TL	FC	Total	TL	FC	Total
		1146)		10	Total		10	Total
I.	Deposits	(II-1)	20.390.313	15,575,127	35,965,440	19,969,274	12,308,163	32,277,437
ii.	Loans received	(II-1) (II-3)	501,334	15,690,583	16,191,917	467.942	20,899,432	21,367,374
III.	Money market funds	(•)	2,239	37,749	39,988	2,166	20,450	22,616
IV.	Securities Issued (net)	(II-4)	2,200	01,140	-	2,100	20,400	22,010
4.1	Bills	()	_	_	_	_	_	_
4.2	Asset backed securities		_	_	_	_	_	_
4.3	Bonds		_	_	_	_	_	_
V.	Funds		-	-	-	-	-	_
5.1	Borrower funds		_	_	_	_	_	_
5.2	Other		-	-	_	-	-	-
	Financial liabilities at fair value through							
VI.	profit or loss		_	_	_	_	_	_
VII.	Derivative financial liabilities		515,209	137,709	652.918	911.803	199.959	1,111,762
•	Derivative financial liabilities at fair value		0.0,200	,	002,010	0.1.,000	.00,000	.,,
7.1	through profit or loss	(II-2)	159,169	128,558	287,727	652,925	195,431	848,356
	Derivative financial liabilities at fair value	(=/	,	,		,	,	,
7.2	through other comprehensive income	(II-7)	356,040	9,151	365,191	258,878	4,528	263,406
VIII.	Factoring payables	()	23	979	1.002	26	620	646
IX.	Lease payables (net)	(II-6)	312,900	7,240	320.140		-	-
Χ.	Provisions	(II-8)	209,696	-,	209,696	271,080	-	271,080
10.1	Provision for restructuring	(0)		_	-	,	_	,,,,,,,
10.2	Reserves for employee benefits		58,174	_	58,174	53,664	_	53,664
10.3	Insurance technical reserves (net)		-	_	-	-	_	-
10.4	Other provisions		151,522	_	151,522	217,416	_	217,416
XI.	Current tax liability	(II-9)	206,925	1,574	208,499	250.939	797	251,736
XII.	Deferred tax liability	(II-9)	409,401	.,	409,401	430,595		430,595
,	Liabilities for assets held for sale and	(11 0)	400,401		400,401	400,000		400,000
XIII.	assets of discontinued operations (net)	(II-10)	_	_	_	_	_	_
13.1	Held for sale	(,	_	_	_	_	_	_
13.2	Related to discontinued operations		_	_	_	_	_	_
XIV.	Subordinated debt	(II-11)	_	4,141,975	4,141,975	_	3,813,522	3,813,522
14.1	Loans	(,	_	4,141,975	4,141,975	_	3,813,522	3,813,522
14.2	Other debt instruments		_	-,,	-,,	_	-	-
XV.	Other liabilities	(II-5)	668,979	139,217	808.196	1,058,514	149.188	1,207,702
XVI.	Shareholders' equity	(II-12)	8,326,656	(9,306)	8,317,350	7,662,094	(4,482)	7,657,612
16.1	Paid-in capital	(12)	3,486,268	(0,000)	3,486,268	3,486,268	(4,402)	3,486,268
16.2	Capital reserves		-	_	-	-	_	
16.2.1			_	_	_	_	_	_
16.2.2			_	_	_	_	_	_
16.2.3	•		_	_	_	_	_	_
10.2.5	Other comprehensive income/expense							
16.3	items not to be recycled to Profit or Loss		139,974	_	139,974	139,276	_	139,276
10.0	Other comprehensive income/expense		100,014		100,014	100,210		100,210
16.4	items to be recycled in Profit or Loss		323,889	(9,306)	314,583	598,124	(4,482)	593,642
16.5	Profit reserves		3,446,286	(0,000)	3,446,286	2.297.792	(4,402)	2,297,792
16.5.1	Legal reserves		256,871	-	256,871	201,819	-	201,819
16.5.2	Statutory reserves		200,071	_	200,011	201,010	-	201,010
16.5.3	Extraordinary reserves		3,189,415	-	3,189,415	2,095,973	_	2,095,973
16.5.4			5, 155,715	-	5, 155,715	2,000,010	-	2,000,010
16.6	Profit or (loss)		930,239	-	930,239	1,140,634	-	1,140,634
16.6.1	Prior years' profits or (loss)		930,239	-	930,239	1, 140,034	-	1, 140,034
16.6.2	Current period profit or (loss)		930,239	-	930,239	1,140,634	-	1,140,634
16.7	Minority interest		330,233	-	330,233	1, 170,004	-	1,140,034
10.1	willionty interest		-	-	-	-	-	-
	Total liabilities and shareholders' equity		31,543,675	35,722,847	67,266,522	31,024,433	37,387,649	68,412,082
	rotal nabilities and shareholders equity		31,343,075	33,122,041	31,200,322	31,024,433	31,301,049	00,412,002

Consolidated statement of off-balance sheet items as of 30 June 2019

					Reviewed Current period			Audited Prior period
	Off-balance sheet items	Note (section			(30/06/2019)			(31/12/2018
		five)	TL	FC	Total	TL	FC	Total
Α.	Off-balance sheet commitments (I+II+III)	/III 4)	35,760,778	63,976,507	99,737,285	46,655,305	63,802,736	110,458,041
l. 1.1	Guarantees and warranties Letters of guarantee	(III-1)	2,037,356 2,025,637	6,866,822 5,156,890	8,904,178 7,182,527	2,163,251 2,135,210	6,724,218 4,474,703	8,887,469 6,609,913
1.1.1	Guarantees subject to state tender law		8,399	-	8,399	14,570	-,414,100	14,570
1.1.2	Guarantees given for foreign trade operations		-	-	-	-	-	-
1.1.3	Other letters of guarantee		2,017,238	5,156,890	7,174,128	2,120,640	4,474,703	6,595,343
1.2	Bank acceptances		-	33,524 33,524	33,524	-	39,370	39,370
1.2.1 1.2.2	Import letter of acceptance Other bank acceptances		-	33,324	33,524	-	39,370	39,370
1.3	Letters of credit		396	1,155,451	1,155,847	396	1,763,942	1,764,338
1.3.1	Documentary letters of credit		396	1,155,451	1,155,847	396	1,763,942	1,764,338
1.3.2	Other letters of credit		-	-	-	-	-	-
1.4 1.5	Pre-financing given as guarantee Endorsements		-	-	-	-	-	-
1.5.1	Endorsements to the Central Bank of Turkey							
1.5.2	Other endorsements		-	-	-	-	-	-
1.6	Purchase guarantees for securities issued		-	-	-	-	-	-
1.7	Factoring guarantees		7,481	93,621	101,102	25,318	99,940	125,258
1.8 1.9	Other guarantees Other warranties		3,842	230,950 196,386	230,950 200,228	2,327	247,879 98,384	247,879 100,711
II.	Commitments	(III-1)	4,081,834	1,203,392	5,285,226	4,144,632	913,196	5,057,828
2.1	Irrevocable commitments	()	4,081,834	1,203,392	5,285,226	4,144,632	913,196	5,057,828
2.1.1	Forward asset purchase commitments		560,252	1,177,160	1,737,412	403,269	895,834	1,299,103
2.1.2	Forward deposit purchase and sales commitments		-	-	-	-	-	-
2.1.3	Share capital commitments to associates and subsidiaries		1 7/2 24/	04.040	1 767 457	1 007 005	45 500	1 000 451
2.1.4 2.1.5	Loan granting commitments Securities underwriting commitments		1,743,214	24,243	1,767,457	1,807,625	15,526	1,823,151
2.1.5	Commitments for reserve requirements			-	-	-		-
2.1.7	Commitments for cheque payments		350,452	-	350,452	352,249	-	352,249
2.1.8	Tax and fund liabilities from export commitments		23,780	-	23,780	20,545	-	20,545
2.1.9	Commitments for credit card limits		1,398,498	-	1,398,498	1,553,684	-	1,553,684
2.1.10	Commitments for credit cards and banking services promotions		5,257	-	5,257	5,479	-	5,479
2.1.11 2.1.12	Receivables from short sale commitments of marketable securities Payables for short sale commitments of marketable securities		-	-	-	-	-	-
2.1.12	Other irrevocable commitments		381	1,989	2,370	1,781	1,836	3,617
2.2	Revocable commitments		-		-	-,,,,,		
2.2.1	Revocable loan granting commitments		-	-	-	-	-	-
2.2.2	Other revocable commitments			_			_	.
III.	Derivative financial instruments	(III-2)	29,641,588	55,906,293	85,547,881	40,347,422	56,165,322	96,512,744
3.1 3.1.1	Derivative financial instruments for hedging purposes Fair value hedges		16,309,987	5,005,502	21,315,489	21,984,936	4,734,539	26,719,475
3.1.1	Cash flow hedges		16,309,987	5,005,502	21,315,489	21,984,936	4,734,539	26,719,475
3.1.3	Net foreign investment hedges		-	-	-	-		-
3.2	Derivative financial instruments for trading purposes		13,331,601	50,900,791	64,232,392	18,362,486	51,430,783	69,793,269
3.2.1	Forward foreign currency buy/sell transactions		2,677,806	7,285,879	9,963,685	3,095,729	11,074,747	14,170,476
3.2.1.1	Forward foreign currency transactions-buy		2,284,818	2,763,329	5,048,147	2,553,730	4,648,919	7,202,649
3.2.1.2 3.2.2	Forward foreign currency transactions-sell Swap transactions related to foreign currency and interest rates		392,988 10,357,427	4,522,550 41,030,974	4,915,538 51,388,401	541,999 15,051,633	6,425,828 38,647,276	6,967,827 53,698,909
3.2.2.1	Foreign currency swap-buy		1,893,544	16,181,362	18,074,906	3,332,426	18,037,056	21,369,482
3.2.2.2	Foreign currency swap-sell		5,073,883	12,508,882	17,582,765	10,579,207	11,431,226	22,010,433
3.2.2.3	Interest rate swap-buy		1,695,000	6,170,365	7,865,365	570,000	4,589,497	5,159,497
3.2.2.4	Interest rate swap-sell		1,695,000	6,170,365	7,865,365	570,000	4,589,497	5,159,497
3.2.3	Foreign currency, interest rate and securities options		296,368 148,184	2,583,938	2,880,306	181,758	1,708,760	1,890,518
3.2.3.1 3.2.3.2	Foreign currency options-buy Foreign currency options-sell		148,184	1,291,969 1,291,969	1,440,153 1,440,153	90,879 90,879	854,380 854,380	945,259 945,259
3.2.3.3	Interest rate options-buy		140,104	1,231,303	1,440,133	30,073	-	545,255
3.2.3.4	Interest rate options-sell		_	_	-	-	_	-
3.2.3.5	Securities options-buy		-	-	-	-	-	-
3.2.3.6	Securities options-sell		-	-	-	-	-	-
3.2.4 3.2.4.1	Foreign currency futures		-	-	-	-	-	-
3.2.4.1	Foreign currency futures-buy Foreign currency futures-sell		-	-	-	-	-	-
3.2.5	Interest rate futures		-	-	-	-	-	
3.2.5.1	Interest rate futures-buy		_	_	-	-	_	-
3.2.5.2	Interest rate futures-sell		-	-	-	-	-	-
3.2.6	Other					33,366		33,366
B.	Custody and pledged items (IV+V+VI)		235,530,161	48,317,342	283,847,503	236,801,620	46,253,124	283,054,744
IV. 4.1	Items held in custody Customer fund and portfolio balances		1,139,141 854,316	2,021,483	3,160,624 854,316	980,400 401,049	1,952,616	2,933,016 401,049
4.1	Investment securities held in custody		66,869	320,013	386,882	89,196	291,567	380,763
4.3	Checks received for collection		44,889	367,622	412,511	308,278	412,217	720,495
4.4	Commercial notes received for collection		160,585	1,243,129	1,403,714	169,395	1,143,098	1,312,493
4.5	Other assets received for collection		-	-	-	-	-	-
4.6	Assets received for public offering		40 400	00.740	102 204	40 400	105 704	440.040
4.7 4.8	Other items under custody Custodians		12,482	90,719	103,201	12,482	105,734	118,216
4.6 V .	Pledged received		34,528,823	9,276,539	43,805,362	36,573,782	9,371,568	45,945,350
5.1	Marketable securities		143,221	16,142	159,363	223,731	7,819	231,550
5.2	Guarantee notes		7,174,610	2,114,699	9,289,309	7,252,373	1,944,017	9,196,390
5.3	Commodity		910	-	910	910	-	910
5.4	Warranty		-	-	-	-		-
5.5	Properties Other laded its and		24,278,537	6,221,983	30,500,520	25,499,601	6,140,983	31,640,584
5.6 5.7	Other pledged items Pledged items-depository		2,931,545	923,715	3,855,260	3,597,167	1,278,749	4,875,916
ο. <i>τ</i> VI.	Accepted independent guarantees and warranties		199,862,197	37,019,320	236,881,517	199,247,438	34,928,940	234,176,378
				,,_,		,,	,- 20,0 - 0	,,,,,,,,,,,
	Total off-balance sheet items (A+B)		271,290,939		383,584,788	283,456,925		

Consolidated statement of profit or loss for the six-month period ended 30 June 2019

			Reviewed	Reviewed	Reviewed	Reviewed
	Income and expense items	Note	Current period	Prior period	Prior period	Prior period
		(section five)	(01/01/2019- 30/06/2019)	(01/04/2019- 30/06/2019)	(01/01/2018- 30/06/2018)	(01/04/2018- 30/06/2018)
		,	,	,	•	
l.	Interest income	(IV-1)	3,905,880	1,950,333	3,138,900	1,630,672
1.1 1.2	Interest on loans Interest on reserve requirements		3,040,869 45,559	1,453,636 23,533	2,803,809 33,587	1,460,162 18,262
1.3	Interest on banks		73,071	29,095	24,112	14,649
1.4	Interest on banks Interest on money market transactions		489,648	319,651	86,258	43,253
1.5	Interest on marketable securities portfolio		179,783	87,434	117,794	54,044
1.5.1	Financial assets at fair value through profit or loss		9,442	1,927	20,903	3,421
1.5.2	Financial assets at fair value through other comprehensive income		54,059	27,805	25,663	13,757
1.5.3	Financial assets measured at amortised cost		116,282	57,702	71,228	36,866
1.6	Finance lease income		24,094	11,602	24,961	13,006
1.7 II.	Other interest income	(1)/ 2)	52,856 (2,214,825)	25,382	48,379	27,296
2.1	Interest expense (-) Interest on deposits	(IV-2)	(1,897,206)	(1,125,179) (965,521)	(1,454,436) (1,141,442)	(778,466) (607,265)
2.2	Interest on deposits Interest on funds borrowed		(284,213)	(140,663)	(287,600)	(157,864)
2.3	Interest on money market transactions		(5,889)	(4,467)	(6,935)	(3,108)
2.4	Interest on securities issued		-	-	(11,344)	(8,759)
2.5	Finance lease expense		(25,085)	(13,500)	-	-
2.6	Other interest expenses		(2,432)	(1,028)	(7,115)	(1,470)
III.	Net interest income/expense (I - II)		1,691,055	825,154	1,684,464	852,206
IV.	Net fees and commissions income/expense		249,414	127,401	227,682	116,564
4.1 4.1.1	Fees and commissions received Non-cash loans		349,071 74,500	178,821 38.915	342,559 65,754	165,945 34,943
4.1.2		(IV-12)	274,571	139,906	276,805	131,002
4.2	Fees and commissions paid (-)	(10 12)	(99,657)	(51,420)	(114,877)	(49,381)
4.2.1			(193)	(123)	(238)	(79)
4.2.2	Other	(IV-12)	(99,464)	(51,297)	(114,639)	(49,302)
V	Dividend income	(IV-3)	175	175	2	-
VI.	Trading gain/(loss) (net)	(IV-4)	447,262	189,287	(222,628)	(79,730)
7.1	Trading gain/(loss) on securities		860	(3,670)	(23,621)	(7,338)
7.2 7.3	Gain/(loss) on derivative financial transactions Foreign exchange gain/(loss)		708,989 (262,587)	178,763 14,194	1,406,601 (1,605,608)	1,202,005 (1,274,397)
VII.	Other operating income	(IV-5)	323,791	139,489	581,660	141,779
VIII.	Gross operating income (III+IV+V+VI+VII)	(14-3)	2,711,697	1,281,506	2,271,180	1,030,819
IX.	Expected credit loss (-)	(IV-6)	(580,606)	(230,425)	(641,853)	(211,738)
X.	Other provision expenses (-)	(-,	(5,469)	(1,837)	(6,849)	6,964
XI.	Personnel expenses (-)		(362,834)	(183,576)	(316,428)	(134,958)
XII	Other operating expenses	(IV-7)	(581,133)	(308,777)	(537,979)	(279,545)
XIII.	Net operating profit/(loss) (IX-X-XI)		1,181,655	556,891	768,071	411,542
XIV. XV.	Income resulted from mergers Income/loss from investments under equity accounting		•	-	-	-
XVI.	Gain/loss on net monetary position		-	-	-	
XVII.	Operating profit/loss before taxes (XII++XV)	(IV-8)	1,181,655	556,891	768,071	411,542
	Provision for taxes of continued operations (±)	(IV-9)	(251,416)	(121,188)	(173,112)	(85,431)
18.1	Current tax provision	, ,	(187,772)	(150,528)	(4,568)	65,320
18.2	Expense effect of deferred tax (+)		(195,468)	(65,582)	(171,996)	(151,800)
18.3	Income effect of deferred tax (-)		131,824	94,922	3,452	1,049
XIX.	Net profit/(loss) from continuing operations (XVI±XVII)	(IV-10)	930,239	435,703	594,959	326,111
XX. 20.1	Income from discontinued operations Income from non-current assets held for resale		-	-	-	-
20.1	Profit from sales of associates, subsidiaries and joint ventures			-	-	
20.3	Income from other discontinued operations		_	-	_	_
XXI.	Expenses for discontinued operations (-)		_	-	-	_
21.1	Expenses for non-current assets held for resale		-	-	-	-
21.2	Loss from sales of associates, subsidiaries and joint ventures		-	-	-	-
21.3	Loss from other discontinued operations		-	-	-	-
	Profit/(loss) before tax from discontinued operations (XIX-XX)		-	-	-	-
23.1	Tax provision for discontinued operations (±) Current tax provision		-	-	-	-
23.1	Expense effect of deferred tax (+)		-	-	-	-
23.2	Income effect of deferred tax (-)		-			_
	Net profit/(loss) from discontinued operations (XXI±XXII)		-	-	-	-
VV//	Not and Still and MARIE WHILE	(07.44)	000 000	/AF 700	F0 1 0F0	200 111
25.1	Net profit/(loss) (XVIII+XXIII) Profit/(Loss) from the Group	(IV-11)	930,239 930,239	435,703 435,703	594,959 594,959	326,111 326,111
25.1 25.2	Income/(Loss) from Minority Interest (-)		93U,∠39 -	435,703	394,939	320,111
			0.0000	0.4050	0.4707	0.0005
	Earnings per share		0.2668	0.1250	0.1707	0.0935

ING Bank A.Ş. and its Financial Subsidiaries

Consolidated statement profit or loss and other comprehensive income for the six-month period ended 30 June 2019

		Reviewed	Reviewed
	Profit or loss and other comprehensive income	Current period	Prior period
		(01/01/2019-	(01/01/2018-
		30/06/2019)	30/06/2018)
I.	Current period profit/loss	930,239	594,959
II.	Other comprehensive income	(281,462)	502,651
2.1	Other income/expense items not to be recycled to profit or loss	(279)	(820)
2.1.1	Gains/(losses) on revaluation of property, plant and equipment	· · ·	· -
2.1.2	Gains/(losses) on revaluation of intangible assets	-	-
2.1.3	Defined benefit plans' actuarial gains/(losses)	(353)	(1,030)
2.1.4	Other income/(expense) items not to be recycled to profit or loss	· -	(4)
2.1.5	Deferred taxes on other comprehensive income not to be recycled to profit or loss	74	214
2.2	Other income/expense items to be recycled to profit or loss	(281,183)	503,471
2.2.1	Translation differences	(5,656)	6,973
2.2.2	Income/(Expenses) from valuation and/or reclassification of financial assets measured at FVOCI	13,867	(23,175)
2.2.3	Gains/(losses) from cash flow hedges	(367,010)	653,869
2.2.4	Gains/(losses) on hedges of net investments in foreign operations	· · · · · · · · · · · · · · · ·	-
2.2.5	Other income/(expense) items to be recycled to profit or loss	-	-
2.2.6	Deferred taxes on other comprehensive income to be recycled to profit or loss	77,616	(134,196)
III.	Total comprehensive income (I+II)	648,777	1,097,610

ING Bank A.Ş. and its Financial Subsidiaries

Consolidated statement of changes in equity for the six-month period ended 30 June 2019 (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

Changes in equity

	Statement of changes in shareholders' equity							ensive income/expe ecycled to profit or			ehensive income/expense recycled to profit or loss	items to be						
	Reviewed	Note	Paid-in capital	Share premium	Share cancellation profits	Other capital reserves	Revaluation surplus on tangible and intangible assets	Defined benefit plans' actuarial gains/losses	Other (1)	Translation differences	Income/expenses from valuation and/or reclassification of financial assets measured at FVOCI	Other (2)	Profit reserves	Prior period profit or (loss)	Current period profit or (loss)	Total equity except from minority interest	Minority interest	Total shareholders ' equity
	Prior period (01/01/2018-30/06/2018)																	
I.	Balances at beginning of period		3,486,268	-	-	-	46,732	161	143	26,338	(16,548)	250,288	1,232,863	-	888,155	5,914,400	-	5,914,400
II.	Correction made as per TAS 8		-	-	-	-	-	-	(399)	-	11,951	-	408,439	-	-	419,991	-	419,991
2.1	Effect of corrections		-	-	-	-	-	-	(000)	-	-	-	-	-	-	-	-	440.004
2.2 III.	Effect of changes in accounting policies New balance (I+II)		3,486,268	-	-	-	46.732	161	(399) (256)	26,338	11,951 (4,597)	250,288	408,439 1,641,302	-	888,155	419,991 6,334,391	-	419,991 6,334,391
IV.	Total comprehensive income		3,400,200				40,732	(816)	15	20,330	(17,598)	514.077	1,041,302		594,959	1,090,637		1,090,637
V.	Capital increase by cash		_	_	_	_	_	(010)	-	_	(17,000)		_	_	-	-	_	1,000,007
VI.	Capital increase by internal sources		-	-	-	-	-	-	-	_	-	-	-	-	-	-	-	-
VII.	Paid-in capital inflation adjustment difference		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
VIII.	Convertible bonds to shares		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
IX.	Subordinated debt instruments		-	-	-	-	-	-	-	(04.004)	-	-	-	-	-	- 0.70	-	
X. XI.	Increase/decrease by other changes Profit distribution		-	-	-	-	94,189	-	-	(24,301)	-	-	31,274 625,216	-	(888,155)	6,973 (168,750)	-	6,973 (168,750)
11.1	Dividends paid		-	-	-		94,109	-	-			-	(168,750)	-	(000, 100)	(168,750)	-	(168,750)
11.2	Transfers to reserves						94,189	-				-	793,966		(888,155)	(100,730)	_	(100,730)
11.3	Other		-	-	-	-		-	-	-	-	-	-	-	(000,100)	-	-	-
	Period-end balance (III+IV++X+XI)		3,486,268				140,921	(655)	(241)	2,037	(22,195)	764.365	2.297.792		594,959	7,263,251		7,263,251
	r enou-end balance (iii-ivx-xi)		3,400,200				140,321	(000)	(241)	2,037	(22,133)	704,303	2,231,132		334,333	7,203,231		7,203,231
	Current period																	
	(01/01/2019-30/06/2019)																	
I. II.	Balances at beginning of period Correction made as per TAS 8		3,486,268	-	-	-	140,921	(1,404)	(241)	3,858	(13,180)	602,964	2,297,792	-	1,140,634	7,657,612	-	7,657,612
2.1	Effect of corrections		-	-	-	-	•	•		-	-	-	-	-	-	-	-	•
2.2	Effect of changes in accounting policies		-	-	-	_	-	-	_	-	_	-	-	-	-	-	-	
III.	New balance (I+II)		3,486,268	-	_	_	140,921	(1,404)	(241)	3,858	(13,180)	602,964	2,297,792	-	1,140,634	7,657,612	-	7,657,612
IV.	Total comprehensive income		· · · -	-	-	-		(279)	` -	(3,532)	12,079	(287,606)		-	930,239	650,901	-	650,901
V.	Capital increase by cash		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
VI.	Capital increase by internal sources		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
VII.	Paid-in capital inflation adjustment difference		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
VIII. IX.	Convertible bonds to shares Subordinated debt instruments		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
X.	Increase/decrease by other changes		-	-	-	_	-	-	_	-	_	-	(2,124)	-	-	(2,124)	-	(2,124)
XI.	Profit distribution		_	_	-	-	977	-		_		-	1,150,618	-	(1,140,634)	10,961	_	10,961
11.1	Dividends paid	(II-12)	-	-	-	-	-	-	-	_	-	-	-,100,010	-	. ,	-	-	, , , ,
11.2	Transfers to reserves	(II-12)	-	-	-	-	977	-	-	-	-	-	1,150,618	-	(1,140,634)	10,961	-	10,961
11.3	Other		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Period-end balance (III+IV++X+XI)		3.486.268				141.898	(1,683)	(241)	326	(1.101)	315,358	3.446.286		930.239	8.317.350		8,317,350

⁽¹⁾ Other (Shares of investments valued by equity method in other comprehensive income not to be recycled to profit or loss and other accumulated amounts of other comprehensive income items not to be recycled to other profit or loss)

The accompanying explanations and notes form an integral part of these consolidated financial statements.

⁽²⁾ Other (Cash flow hedge gain/loss, shares of investments valued by equity method in other comprehensive income recycled to profit or loss and other accumulated amounts of other comprehensive income items recycled to other profit or loss)

Consolidated statement of cash flows for the six-month period ended 30 June 2019 (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

	Statement of Cash flows	Note	Reviewed Current period	Reviewed Prior period
			(01/01/2019- 30/06/2019)	(01/01/2018- 30/06/2018)
A.	Cash flows from banking operations			
1.1	Operating profit/(loss) before changes in operating assets and liabilities		1,342,516	(231,953)
1.1.1	Interest received		3,990,142	3,108,217
1.1.2	Interest paid		(2,230,607)	(1,459,833)
1.1.3	Dividend received		175	2
1.1.4	Fees and commissions received		340,494	342,559
1.1.5	Other income		43,894	44,571
1.1.6 1.1.7	Collections from previously written-off loans and other receivables Payments to personnel and service suppliers		283,019 (726,428)	314,169 (59,559)
1.1.7	Taxes paid		(229,953)	(100,269)
1.1.9	Other		(128,220)	(2,421,810)
1.2	Changes in operating assets and liabilities		2,395,051	1,294,238
	• •			
1.2.1	Net increase/decrease in financial assets at fair value through profit or loss		(37,136)	17,110
1.2.2	Net (increase) decrease in due from bank		121,732	(92,232)
1.2.3	Net (increase) decrease in loans		5,348,505	(3,887,920)
1.2.4 1.2.5	Net (increase) decrease in other assets		949,612	(2,202,568) 1,739,420
1.2.6	Net increase (decrease) in bank deposits Net increase (decrease) in other deposits		(88,487) 3,028,269	2,522,954
1.2.7	Net increase/decrease in financial liabilities at fair value through profit or loss		3,020,209	2,322,334
1.2.8	Net increase / (decrease) in funds borrowed		(6,020,046)	1,912,274
1.2.9	Net increase / (decrease) in payables		-	-,0.2,2
1.2.10	Net increase / (decrease) in other liabilities		(907,398)	1,285,200
l.	Net cash provided from banking operations		3,737,567	1,062,285
В.	Cash flow from investing activities			
II.	Net cash provided from investing activities		(21,554)	(54,643)
2.1	Cash paid for acquisition of subsidiaries, investments in associates and joint			
2.2	ventures Cash obtained from disposal of subsidiaries, investments in associates and		-	-
	joint ventures		15,318	-
2.3	Purchases of property and equipment		(124,904)	(127,575)
2.4	Disposals of property and equipment		150,082	1,820
	Cash paid for purchase of financial assets at fair value through other		/	/ ·
2.5	comprehensive income		(77,886)	(67,153)
2.6	Cash obtained from sale of financial assets at fair value through other comprehensive income		15.006	
2.6 2.7	Cash paid for purchase of financial assets measured at amortised cost		15,836	-
2.8	Cash obtained from sale of financial assets measured at amortised cost		_	142,041
2.9	Other		-	(3,776)
C.	Cash flows from financing activities			
III.	Net cash provided from financing activities		(52,473)	95,250
3.1	Cash obtained from funds borrowed and securities issued	(11-4)	-	265,000
3.2	Cash used for repayment of funds borrowed and securities issued	(11-4)	-	(1,000)
3.3	Issued equity instruments	. ,	-	-
3.4	Dividends paid	(II-12)	-	(168,750)
3.5 3.6	Payments for finance leases Other		(52,473)	-
IV.	Effect of change in foreign exchange rate on cash and cash equivalents		488,302	578,379
V .	Net increase in cash and cash equivalents (I+II+III+IV)		4,151,842	1,681,271
VI.	Cash and cash equivalents at beginning of the period		11,420,391	5,183,052
VII.	Cash and cash equivalents at the end of the period		15,572,233	6,864,323

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

Section three

Accounting policies

- I. Explanations on basis of presentation
 - a. The preparation of the consolidated financial statements and related notes and explanations in accordance with the Turkish Accounting Standards and regulation on the Regulation on Accounting Applications for Banks and Safeguarding of Documents

The consolidated financial statements have been prepared in accordance with the "Regulation on Accounting Applications for Banks and Safeguarding of Documents" and other regulations, communiqués, explanations and circulars promulgated by the Banking Regulation and Supervision Agency ("BRSA") in relation to accounting and financial reporting principles of banks and for the issues not regulated by as per Turkish Accounting Standards issued by the Public Oversight Accounting and Auditing Standards Authority ("POA") (hereafter, referred as "BRSA Accounting and Financial Reporting Legislation"). The Bank maintains its books in Turkish Lira in accordance with the Banking Law, Turkish Commercial Code and Turkish Tax Legislation.

The consolidated financial statements have been prepared at Turkish Lira on a historical cost basis, except for the financial assets and financial liabilities measured on a fair value basis.

The preparation of consolidated financial statements in conformity with BRSA Accounting and Financial Reporting Legislation requires the use of certain critical accounting estimates and assumptions by the Parent Bank management to exercise its judgment on the assets and liabilities of the balance sheet and contingent issues as of the balance sheet date. These estimates and assumptions include fair value calculation of financial instruments and impairment of financial assets are being reviewed regularly and, when necessary, adjustments are made and the effects of these adjustments are reflected to the statement of profit or loss.

b. Additional paragraph for convenience translation to English

The differences between accounting principles, as described in the preceding paragraphs, and the accounting principles generally accepted in countries, in which the accompanying financial statements are to be distributed, and International Financial Reporting Standards ("IFRS"), may have significant influence on the accompanying financial statements. Accordingly, the accompanying consolidated financial statements are not intended to present the financial position and results of operations in accordance with the accounting principles generally accepted in such countries and IFRS.

c. Accounting policies and valuation principles applied in the presentation of consolidated financial statements

The accounting policies and valuation principles applied in the preparation of consolidated financial statements are determined and applied in accordance with BRSA Accounting and Financial Reporting Legislation. These accounting policies and valuation principles are explained in Notes II to XXV below.

The accounting policies adopted in the preparation of the consolidated financial statements are consistent with the standards used in the previous year, except for as explained in Note I-d.

d. Changes in accounting policies and disclosures

The Group has started to apply TFRS 16 Leases standard in the accompanying consolidated financial statements starting from 1 January 2019 for the first time based on the regulation published in the Official Gazette no. 29826 dated 16 April 2018 which came into force starting from 1 January 2019. The effects of TFRS 16 on the financial statements of the Group are presented in section three, footnote XXV.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

I. Explanations on basis of presentation (continued)

Standards effective as of 1 January 2019

TFRS 16 Leases

TFRS 16 Leases standard ("TFRS 16"), effective starting from 1 January 2019, removes the distinction between operating and finance leases applied by the lessee in TAS 17 Leases ("TAS 17"). Instead, it is set forth a single accounting model similar to the accounting of finance leases on balance sheet. For lessors, the accounting stays almost the same.

II. Explanations on the strategy of using financial instruments and foreign currency transactions

The Group manages its financial instruments strategies according to its liability structure. The liability structure is mainly comprised of deposits. The investment instruments are generally chosen from liquid instruments. Thus, liquidity is sustained to meet liabilities. As reporting date, the Group's asset and shareholder's equity structure is sufficient to meet its liabilities.

Due to the risks management policy, the Group does not take significant currency positions. In case of a currency risk due from the customer transactions, the Group makes contra transactions in order to close the position.

The investment decisions are made taking the balance sheet items' maturity structure and interest rates into consideration. Limits related to the balance sheet are determined. The distribution of assets is determined and income analyses are made according to this distribution.

When carrying out off-balance sheet forward transactions, the Group aims to perform contra transactions as well, thus paying maximum attention to the currency and interest rate risks. The customer limits for transactions are determined.

Explanations on foreign currency transactions:

Translation gains and losses arising from foreign currency transactions are accounted for within the period in which the transaction occurs. In period-ends, foreign currency denominated monetary assets and liabilities are translated into TL with the exchange buying rates of the Parent Bank prevailing at the reporting date. Gains and losses arising from such transactions are recognized in the statement of profit or loss under the account of foreign exchange gains or losses.

Foreign currency denominated accounts of the subsidiaries within the Group have been valued with the foreign exchange buying rates applicable on the reporting date.

Regarding the financial statements of the foreign subsidiary of the Group, balance sheet items are converted to Turkish Lira at the period-end balance sheet exchange rates, and statement of profit or loss items are converted at average exchange rate, and all resulting exchange differences are accounted in the shareholders' equity under "Other comprehensive income/expense items to be recycled in Profit or Loss".

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

III. Explanations on consolidated subsidiaries

According to the full consolidation method, all of the subsidiaries' assets, liabilities, income, expense and off-balance sheet items are combined with the Parent Bank's assets, liabilities, income, expense and off-balance sheet items. The book value of the Parent Bank's investment in each subsidiary and the capital of each subsidiary are eliminated. Intercompany balances and profits and losses resulting from intercompany transactions are offset against each other. Parent Bank's guarantees given for the cash loans granted by consolidated subsidiaries are eliminated at consolidation and such exposures are included under cash loans in assets.

Where different accounting policies have been applied by the subsidiaries, these accounting policies have been aligned with the accounting policies of the Parent Bank.

ING European Financial Services Plc.

ING European Financial Services Plc. was established in 1994, in Ireland, to operate in corporate finance, issuance of certificates of deposits and treasury services.

The financial statements of the Company are prepared in EUR in accordance with the accounting principles effective in Ireland. The required adjustments and re-classifications have been made on the financial statements of the Company in order to comply with the financial statements of the Parent Bank.

ING Faktoring A.Ş. (ING Factoring)

ING Factoring was established in 2008 for the purpose of engaging in import, export and local factoring activities. The Company was granted operation license by the BRSA Board Decision, No. 3564, dated 3 March 2010.

The Company prepares its financial statements in accordance with the communique on the Application of Uniform Chart of Accounts and its Guide Book for Financial Leasing, Factoring and Financing Companies, TAS, TFRS and other regulations, communiqués, explanations and circulars promulgated by the BRSA in relation to accounting and financial reporting principles. The required adjustments and reclassifications have been made on the financial statements of the Company in order comply with the financial statements of the Parent Bank.

ING Finansal Kiralama A.Ş. (ING Leasing)

ING Leasing was established in 2008 for the purpose of operating in financial leasing activities and execute all kinds of transactions and contracts related to these activities. The company was granted operating license with the BRSA Board Decision, No. 3564, dated 3 March 2010.

The Company prepares its financial statements in accordance with the communique on the Application of Uniform Chart of Accounts and its Guide Book for Financial Leasing, Factoring and Financing Companies, TAS, TFRS and other regulations, communiqués, explanations and circulars promulgated by the BRSA in relation to accounting and financial reporting principles. The required adjustments and reclassifications have been made on the financial statements of the Company in order comply with the financial statements of the Parent Bank.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

III. Explanation on consolidated subsidiaries (continued)

ING Menkul Değerler A.S. (ING Securities)

ING Securities was established in 1991 under the title Universal Menkul Değerler A.Ş. in 1991, and was acquired by ING UK Holdings Limited on 30 October 2008, and the title of the Company was changed as ING Menkul Değerler A.Ş. at the date of 27 May 2009. 100% shares of ING Securities were purchased by the Parent Bank on 15 August 2012.

Capital Markets Board approved the Company's application for continuing its operations and performing margin trading, short selling and lending and borrowing transactions of capital market instruments under its trading brokerage license as of 11 January 2013. On 26 July 2013, the Capital Markets Board approved the Company's application for a license to operate as an intermediary in trading derivatives for the purpose of operating in the futures and options market. With the Capital Market Board letter, dated 19 November 2013, the application of ING Securities for the establishment of an agency was approved as from 15 November 2013.

The financial statements of the Company are prepared in accordance with the Capital Markets Board legislation with respect to TAS enacted by POA. The required adjustments and re-classifications have been made on the financial statements of the Company in order to comply with the financial statements of the Parent Bank.

IV. Explanations on forward and options contracts and derivative instruments

The Group's derivative instruments consist of forward buy/sell, swaps, futures, and options contracts.

Derivative financial instruments of the Group are classified as "Derivative Financial Assets Designated at Fair Value through Profit or Loss" or "Derivative Financial Assets Designated at Fair Value through Other Comprehensive Income" per TFRS 9.

Payables and receivables arising from the derivative instruments are recorded in the off-balance sheet accounts at their contractual values.

Derivative transactions are valued at their fair values subsequent to their acquisition. In accordance with the classification of derivative financial instruments, if the fair value is positive, the amount is classified as "Derivative Financial Assets Designated at Fair Value Through Profit or Loss" or "Derivative Financial Assets Designated at Fair Value Through Other Comprehensive Income", if the fair value is negative, the amount is classified as "Derivative Financial Liabilities Designated at Fair Value Through Profit or Loss" or "Derivative Financial Liabilities Designated at Fair Value Through Other Comprehensive Income". The fair value differences of derivative financial instruments are recognized in the statement of profit or loss under trading profit/loss line in profit/loss from derivative financial transactions. The fair value of derivative instruments is calculated by taking into account the market value of the derivatives or by using the discounted cash flow model.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

IV. Explanations on forward and options contracts and derivative instruments (continued)

Explanations on derivative financial instruments held for hedging purpose

As permitted by TFRS 9, the Group continues to apply hedge accounting in accordance with TAS 39.

The Group enters into interest rate and cross currency swap transactions in order to hedge the changes in cash flows of the floating-rate financial instruments. While applying cash flow hedge accounting, the effective portion of the changes in the fair value of the hedging instrument is accounted for under "accumulated other comprehensive income or expense to be reclassified to profit or loss" in shareholders' equity, and the ineffective portion is recognised in income statement. The changes recognized in shareholders' equity is removed and included in income statement in the same period when the hedged cash flows effect the income or loss.

Effectiveness tests are performed at the beginning of the hedge accounting period and at each reporting period. The effectiveness tests are carried out using the "Dollar off-set model" and the hedge accounting is applied as long as the test results are between the ranges of 80%-125% of effectiveness.

The hedge accounting is discontinued when the hedging instrument expires, is exercised, sold or no longer effective. When discontinuing fair value hedge accounting, the cumulative fair value changes in carrying value of the hedged item arising from the hedged risk are amortised to income statement under trading account income/loss caption over the maturity of the hedged item from that date of the hedge accounting is discontinued. While expiring, sale, discontinuing cash flow hedge accounting or when no longer effective the cumulative gains/losses recognised in shareholders' equity and presented under "accumulated other comprehensive income or expense to be reclassified to profit or loss" are continued to be kept in this account.

When the cash flows of hedged item incur, the gain/losses accounted for under shareholders' equity are recognised in income statement considering the original maturity.

V. Explanations on interest income and expenses

Interest income and expenses are recognized on an accrual basis using the effective interest method (the rate which equals the future cash flows of a financial asset or liability to its net book value) by taking into consideration present principal amount.

As of 1 January 2018, the Group applies the effective interest rate on the amortized cost of the asset for subsequent reporting periods for the financial assets impaired and classified as non-performing loan. Such interest income calculation is based on contractual basis for all financial assets subject to impairment calculation. During calculation of loss given default rate in expected credit loss models effective interest rate is used, thus, calculation of expected credit losses includes calculated interest amount. Therefore, a reclassification is made between the accounts of "Expected Credit Losses" and "Interest Income From Loans" for such calculated interest amount. If the credit risk of the financial instrument improves to the extent that the financial asset is no longer considered as impaired and the improvement can be attributed to an incident that eventually takes place (such as an increase in the loan's credit rating), the system calculates interest income at subsequent reporting periods by applying the effective interest rate to the gross amount.

VI. Explanations on fee and commission income and expenses

Commissions paid for the loans provided and fees and commissions collected from clients in return for these loans are reflected on the statement of profit or loss in the period when they arise. On the other hand, of the fees and commissions collected from clients, the portions exceeding the amounts paid, and the fees and commissions collected without being associated with any cost are treated as an element of the effective interest of the loan, and they are recognized in the statement of profit or loss during the term of the loan on an accrual basis. Fees and commission expenses paid to the institutions and companies granting the loan are treated as an element of the effective interest, and they are associated with the statement of profit or loss during the term of the loan.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

VII. Explanations on financial instruments

Initial recognition of financial instruments

A financial asset or a financial liability is recognized in the statement of financial position only when it is a party to the contractual provisions of the financial instrument. A regular way purchase or sale of financial assets shall be recognised and derecognised, as applicable, using trade date accounting or settlement date accounting. Purchase and sale transactions of securities are accounted at the settlement date.

Initial measurement of financial instrument

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

Classification of financial instruments

On which category a financial instruments shall be classified at initial recognition depends on both the business model for managing the financial assets and the contractual cash flow characteristics of the financial asset. Thus, the Group has classified all financial assets beginning from 1 January 2018 on the basis of the business model used for the management of these assets and the contractual cash flows.

As per TFRS 9, the Group classifies a financial asset on the basis of its contractual cash flow characteristics if the financial asset is held within a business model whose objective is to hold assets to collect contractual cash flows or within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets. In order to assess whether the element provides consideration for only the passage of time, an entity applies judgement and considers relevant factors such as the currency in which the financial asset is denominated and the period for which the interest rate is set. When the contractual conditions are exposed to the risks which are not consistent with the basic lending arrangement or variability of cash flows, the relevant financial asset is measured at fair value through profit or loss. The Group has tested the "Solely Payments of Principal and Interest" test for all financial assets within the scope of TFRS 9 transition and evaluated asset classifications within the business model.

Assessment of business model

As per TFRS 9, the business model is determined at a level that reflects how groups of financial assets are managed together to achieve a particular business objective.

The Group's business models are divided into three categories.

A business model whose objective is to hold assets in order to collect contractual cash flows:

A business model whose objective is to hold assets in order to collect contractual cash flows are managed to realise cash flows by collecting contractual payments over the life of the instrument. The financial assets that are held within the scope of this business model are measured at amortised cost when the contractual terms of the financial asset meet the condition of giving rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding. Central Bank, banks, money market placements, financial assets measured at amortized cost, loans, lease receivables, factoring receivables and other receivables are evaluated within this business model.

A business model whose objective is achieved by both collecting contractual cash flows and selling financial assets:

The business model in which financial assets are held both for the collection of contractual cash flows and for the sale of financial assets. Fair value change of the financial assets that are held within the scope of this business model are accounted under other comprehensive income when the contractual terms of the financial asset meet the condition of giving rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding. Financial assets measured at fair value through other comprehensive income are evaluated within this business model.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

VII. Explanations on financial instruments (continued)

Other business models:

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

Measurement categories of financial assets and liabilities

According to TFRS 9, the Bank's financial assets are classified in three main categories as listed below:

- Financial assets measured at fair value through profit/loss
- Financial assets measured at fair value through other comprehensive income and
- Financial assets measured at amortized cost (including credits).

Financial assets and liabilities measured at fair value through profit/loss:

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

Financial assets measured at fair value through other comprehensive income:

As per TFRS 9, the financial investments are measured at fair value through other comprehensive income if financial asset is held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets and contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

Financial assets at fair value through other comprehensive income are recognized by adding transaction cost to acquisition cost reflecting the fair value of the financial asset. After the recognition, financial assets at fair value through other comprehensive income are remeasured at fair value. Interest income calculated with effective interest rate method arising from financial assets at fair value through other comprehensive income and dividend income from equity securities are recorded to statement of profit or loss. "Unrealized gains and losses" arising from the difference between the amortized cost and the fair value of financial assets at fair value through other comprehensive income are not reflected in the statement of profit or loss of the period until the acquisition of the asset, sale of the asset, the disposal of the asset, and impairment of the asset and they are accounted under the "Other comprehensive income income/expense items to be recycled in profit or loss" under shareholders' equity.

Equity securities, which are classified as financial assets at fair value through other comprehensive income, that have a quoted market price in an active market and whose fair values can be reliably measured are carried at fair value. Equity securities that do not have a quoted market price in an active market and whose fair values cannot be reliably measured are carried at cost, less provision for impairment.

During initial recognition an entity can choose in an irrevocable way to record the changes of the fair value of the investment in an equity instrument that is not held for trading purposes in the other comprehensive income. In the case of this preference, the dividend from the investment is taken into the financial statements as profit or loss.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

VII. Explanations on financial instruments (continued)

Financial assets measured at amortized cost:

Financial assets that are held for collection of contractual cash flows where those cash flows represent solely payments of principal and interest are classified as financial assets measured at amortized cost.

Financial assets measured at amortized cost are initially recognized at acquisition cost including the transaction costs which reflect the fair value of those instruments and subsequently recognized at amortized cost by using effective interest rate method. Interest income obtained from financial assets measured at amortized cost is accounted in statement of profit or loss.

Loans:

Loans represents financial assets other than those held for trading in short term or generated through providing money, commodity and services to debtors.

Loans are financial assets with fixed or determinable payments and not quoted in an active market.

Loans are initially recognized at acquisition cost plus transaction costs presenting their fair value and thereafter measured at amortized cost using the effective interest rate method.

Group's loans are recorded under the "Loans Measured at Amortized Cost" account.

VIII. Explanations on impairment of financial assets

With the "Regulation on the Procedures and Principles for Determination of Qualifications of Loans and Other Receivables by Banks and Provisions to be Set Aside (Provision Regulation)" promulgated by BRSA in the Official Gazette, no. 29750, dated 22 June 2016, the Group has started calculating provisions as of 1 January 2018, in scope of TFRS 9 for financial instruments, loans and other receivables. Accordingly, loss allowance for expected credit losses is recognized for the financial assets measured at amortised cost and financial assets measured at fair value through other comprehensive income.

Per TFRS 9, loss allowance for expected credit losses is recognised on financial assets measured at amortised cost, financial assets measured at fair value through other comprehensive income, loan commitments and financial guarantee contracts not measured at fair value through profit or loss. Expected credit loss estimates should include objective information weighted according to possibilities and that can be supported about past events, existing conditions and predictions about future economic conditions.

Financial assets within the scope of TFRS 9 are allocated to the three stages according to the change in the quality of the loan after initial recognition and are calculated on the basis of the expected loan loss stage:

- Stage 1: For the financial assets at initial recognition or that do not have a significant increase in credit risk since initial recognition. Impairment for credit risk is recorded in the amount of 12-month expected credit losses.
- Stage 2: In the event of a significant increase in credit risk since initial recognition, the financial asset is transferred to Stage 2. Impairment for credit risk is determined on the basis of the instrument's lifetime expected credit losses.

A financial asset is transferred from Stage 1 to Stage 2 when there is a significant increase in credit risk after initial recognition. Group has established a framework which incorporates quantitative and qualitative information to identify significant risk increase on an asset level applying a relative assessment. Each financial asset is assessed at the reporting date to determine significant risk increase.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

VIII. Explanations on impairment of financial assets (continued)

Group considers the following criteria.

Quantitative criteria: The change in lifetime probability of default is the main trigger the transfer between Stage 1 and Stage 2. The trigger compares probability of default at the origination date versus probability of default at the reporting date, considering the remaining maturity. Assets can be transferred in both directions between Stage 1 and Stage 2. In order to determine if movements can be considered as significant, Group implements different probability of default thresholds to evaluate absolute and relative changes occurring in both retail and corporate portfolios. Related thresholds are being analyzed by back-testing and revised accordingly if necessary. In this context the Group has changed the related thresholds as of 31 March 2019.

Qualitative criteria: Group considers several indicators aligned with those used in credit risk management. Specific qualitative criteria for retail and corporate portfolio has been defined, according to its particularities and with the policies currently in use. The use of these qualitative criteria is complemented with the use of expert judgement.

- > Having past due more than 30 days,
- > Loans classified to watch list status according to the decision of the Group's management,
- ➤ Restructured loans in compliance with "Regulation on the Procedures and Principles for Determination of Qualifications of Loans and Other Receivables by Banks and Provisions to be Set Aside".
- > Restructured loans according to an administrative judgement,
- > Other consumer loans of individual clients whose one of the consumer loan transferred to non-performing loan portfolio.
- Stage 3: Stage 3 includes financial assets that have objective evidence of impairment at the reporting
 date. For these assets, lifetime expected credit losses are recognized and interest revenue is
 calculated on the net carrying amount.

The following criteria are taken into consideration in determining the impairment:

- Having past due more than 90 days
- > Problems in aspect of client's creditworthiness
- Collaterals and/or debtor's equities are insufficient for the timely payment of receivables
- ➤ Collection of receivables is considered to be delayed for more than 90 days due to macroeconomic, industry specific or customer specific reasons.

Use of present, past, future information and macroeconomic predictions: Expected loss estimations take into consideration multiple macroeconomic scenarios for which the probability is measured according to past events, existing conditions and predictions about future economic conditions for economic variables (such as unemployment rates, GDP growth, FX rate fluctuations, real estate prices, and short-term interest rates). Group has defined three macroeconomic scenarios to use for future predictions, a baseline, an up-scenario and a down-scenario. Macroeconomic models are used to convert the parameters used in expected loss estimations to forward looking versions. Different models exist for large corporate, financial institutions, corporate, retail mortgage and retail portfolios.

Expected credit loss measurement:

Group applies "Probability of Default x Exposure at Default x Loss Given Default" method which also takes the time value of money into account. For Stage 1 financial assets; a forward-looking approach on a twelve-month period is applied in order to calculate expected credit loss. For Stage 2 financial assets; a lifetime expected loss is calculated. The lifetime expected loss is the discounted sum of the portions of lifetime losses related to default events within each period of twelve months till maturity. For Stage 3 financial assets; the probability of default equals 100%, the loss given default and the exposure at default represent a lifetime expected loss calculated based on properties of the defaulted loan.

IX. Explanations on offsetting financial assets

Financial assets and liabilities are shown on the balance sheet at their net amounts when the Group has a legally enforceable right to offset the recognized amounts and intents to settle the related financial assets and liabilities on a net basis, or to realize the asset and settle the liability simultaneously.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

X. Explanations on sales and repurchase agreements and securities lending transactions

Marketable securities sold under repurchase agreements ("Repo") are classified as financial assets whose fair value difference is reflected on profit-loss, and which are other comprehensive income or will be measured at amortised cost, in parallel to the classification of financial instruments. Funds provided in return for repo transactions are recognized in the "funds provided by repo transactions" accounts. The income related to repurchase agreements is reflected to the interest income on marketable securities and expenses paid in relation to repurchase agreements are recognized in "interest on money market borrowings" accounts.

Securities ("Reverse repo") that are purchased with repurchase agreements are classified under receivables from reverse repo transactions. Interest income obtained from reverse repo transactions are recognized under the account "interest obtained from money market transactions".

Securities lending transactions are classified under "money market placements" and accruals are calculated for the interest expense occurred.

XI. Explanations on property and equipment held for sale and related to discontinued operations and on payables regarding these assets

Property and equipment held-for-sale consist of tangible assets that were acquired due to non-performing loans and receivables, and are accounted in the financial statements in accordance with the regulations of "Turkish Financial Reporting Standard for Assets Held for Sale and Discontinued Operations ("TFRS 5").

The assets that meet the criteria of being classified under assets held for sale are measured at the lower of their book values or fair value less costs to be incurred for sale, depreciation for these assets is ceased and these assets are presented separately in the balance sheet. In order for an asset to be classified as an asset held for sale, the related asset (or the asset group to be disposed) shall be ready to be sold immediately under usual conditions and should have a high possibility to be sold. To have a high possibility of sale, a plan should have been made for the sale of the asset (or the asset group to be disposed) and an active program should have been started by the management, aiming to complete the plan and determine the buyers.

The properties obtained from the Group's receivables are shown at the fixed assets held for sale line according to the execution of the forward sales agreement.

A discontinued operation is a part of an entity which is classified as to be disposed or held for sale. The results related to discontinuing operations are presented separately in the statement of profit or loss. The Group does not have any discontinued operations.

XII. Explanations on goodwill and other intangible assets

The intangible assets are measured at their cost calculated by adding the acquisition costs and other direct costs necessary for making the asset in working order.

Subsequently, intangible assets are carried at cost less accumulated depreciation and provision for value decrease.

Intangible assets are depreciated according to straight line method and depreciation rates are determined in line with the useful lives of related assets.

The intangible assets

7% - 33%

The Group does not have goodwill.

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Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

XIII. Explanations on property and equipment

Property and equipment are initially measured at cost calculated by adding the acquisition fees and any directly attributable costs for making the asset in working order. Subsequently, property and equipment is carried at cost less accumulated depreciation and provision for value decrease.

According to precautionary and materiality principles, when the current value of property and equipment is less than their net cost, the net cost which exceeds their current value is recognized in expense account as provision for impairment.

Property and equipment are depreciated according to straight line method and depreciation rates are determined in line with the useful lives of related assets.

Immovables2%Movables, assets acquired by financial leasing2% - 50%Right-of-use assets9% - 50%

The depreciation is set aside at the amount calculated through proportion of the yearly depreciation amount foreseen for the assets held for less than one accounting period to the time for which the asset is held in asset.

Gains and losses on the disposal of property and equipment are reflected to the profit and loss of the related period.

Expenditures for the repair and maintenance of property and equipment are recognized as expense.

There is no injunction, pledge or mortgage on property and equipment.

There is no purchase commitment related to property and equipment.

XIV. Explanations on leasing transactions

Accounting of leasing operations as lessor

The Parent Bank does not have any leasing operations as lessor.

b. Accounting of leasing operations as lessee

Assets acquired under financial leases are capitalized at lower of the fair values of leased assets or discounted value of lease installments. While the total amounts of lease amounts are recognized as liability, the related interest amounts are accounted for as deferred interest. Assets subject to financial leases are followed under property and equipment and are depreciated by using straight-line method. The estimated depreciation rates are determined according to their estimated useful lives.

The Group performs operating lease for branches, ATM locations and vehicles. With the "TFRS 16 Leases" standard which became effective as of 1 January 2019, the difference between the operating lease and financial lease has been removed and the lease transactions are started to be recognised under "Tangible Fixed Assets" as an asset and under "Liabilities from Leasing" as a liability. Other operating leases are not considered within the scope of TFRS 16 as they are below the materiality level and the corresponding rent payments are recognized under "Other Operating Expenses".

The impact and application of TFRS 16 transition were explained in section three, footnote XXV.

XV. Explanations on provisions, contingent assets and liabilities

Provisions and contingent liabilities are accounted in accordance with, "Turkish Accounting Standard for Provisions, Contingent Liabilities and Contingent Assets" ("TAS 37").

Provisions are recognized when there is a present legal or constructive obligation as a result of past events at the balance sheet date; when it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and when a reliable estimate can be made of the amount of the obligation

Provisions are set aside for highly probable and reliably estimated amount of liabilities arisen as a result of prior period events, at the time when such liabilities arise.

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Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

XVI. Explanations on obligations related to employee rights

Provision for employee severance benefits has been accounted for in accordance with TAS 19 "Employee Benefits".

In accordance with the existing social legislation in Turkey, the Parent Bank is required to make lumpsum termination indemnities including retirement and notice payments to each employee whose employment is terminated due to resignation or for reasons other than misconduct. The retirement pay is calculated for every working year within the Parent Bank over salary for 30 days or the official ceiling amount per year of employment and the notice pay is calculated for the relevant notice period time as determined based on the number of years worked for the Parent Bank.

The Parent Bank has calculated provision for employee severance benefits in the attached financial statements in accordance with "Turkish Accounting Standard for Employee Benefits ("TAS 19") by using the "Projection Method" and discounted the total provision by using the current market yield on government bonds based on their previous experience in the issues of completion of personnel service period and severance pay eligibility. Actuarial gains and losses are recognized under equity in accordance with the TAS 19 standard.

In accordance with the existing social legislation in Turkey, the Parent Bank is required to make contribution to Social Security Institution ("SSI") on behalf of their employees. Other than the contributions that the Bank is required to pay, there is no additional requirement to make payment to neither their employees nor SSI. These premiums are reflected to personnel expenses when they accrue.

Provision for the employees' unused vacations has been booked in accordance with TAS 19 and reflected to the financial statements.

There are no foundations, pension funds or similar associations of which the employees are members.

XVII. Explanations on taxation

a. Current tax

The Parent Bank and its subsidiaries operating in Turkey are subject to tax legislation and practices effective in Turkey.

While the corporate tax rate was at the rate of 20% since 1 January 2006, for all companies, such rate has been set as 22% for the tax bases of the years 2018, 2019, and 2020 based on the legislation of the Amendment on Certain Tax Laws and Other Laws no. 7061. Furthermore, the Council of Ministers has been authorized to reduce the rate of 22% down to 20%.

While according to the provisions of Corporate Tax Law, No. 5520, exemption shall be applied for 75% of the earnings from the sale of the properties and participation shares that corporations have kept among their assets for at least two full years (provided that they are added in the capital or kept in a special fund account in liabilities for five years as provided in the Law), and from the sales of founders' shares, preference shares and preferred rights they have kept for same duration; Article 89/a of the Law, No. 7061 effective upon promulgation in the Official Gazette, No. 30261, dated 5 December 2017 and Articles 5.1.e and 5.1.f of Corporate Tax Law have been amended, the exemption applied as 75% was decreased to 50% to be effective as of the promulgation of the Law for the above mentioned sale of properties.

Corporate tax rate is applied on the tax base calculated after the addition of the non-deductible expenses in the commercial income of corporations and deduction of exemptions stated in tax laws (such as participation income exemption) and deductions. No other tax is paid unless profit is distributed.

According to the Corporate Tax Law, financial losses can be carried forward to offset against corporate tax base of the related period for up to five years. Tax authorities inspect tax returns and the related accounting records within five years and check the tax calculations.

Corporate tax is required to be filed by the twenty-fifth day of the fourth month following the balance sheet date and taxes must be paid in one installment by the end of the fourth month. Pursuant to the tax legislation, an advance tax is calculated and paid based on earnings generated for each quarter. The amounts thus paid are deducted from the tax calculated over annual earning.

Current year tax amounts to be paid are netted off as they are related with prepaid tax amounts.

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Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

XVII. Explanations on taxation (continued)

b. Deferred tax

The Group calculates and accounts for deferred income taxes for all temporary differences arising between the tax bases of assets and liabilities and their carrying amounts in these financial statements in accordance with "Turkish Accounting Standard for Income Taxes" ("TAS 12") and the related decrees of the BRSA concerning income taxes. In the deferred tax calculation, the enacted tax rate, in accordance with the tax legislation, is used as of the balance sheet date. The Law regarding amendments on Certain Tax Laws was approved in The Grand National Assembly of Turkey on 28 November 2017 and the Law was published in the Official Gazette on 5 December 2017. Accordingly, the corporate income tax rate will be increased from 20% to 22% for the years 2018, 2019 and 2020. According to the Law that have been enacted, deferred tax asset and liabilities shall be measured at the tax rate 22% that are expected to apply to these periods when the assets is realised or the liability is settled. For the periods 2021 and after deferred tax assets and liabilities were measured by 20% tax rate. Furthermore, the Council of Ministers has been authorized to reduce the rate of 22% down to 20%.

If transactions and events are recorded in the statement of profit or loss, then the related tax effects are also recognized in the statement of profit or loss. However, if transactions and events are recorded directly in the shareholders' equity, the related tax effects are also recognized directly in the shareholders' equity.

The deferred tax assets and liabilities are reported as net in the financial statements.

The carrying amount of a deferred tax asset is reviewed at the end of each reporting period. An entity shall reduce the carrying amount of a deferred tax asset to the extent that it is no longer probable that sufficient taxable profit will be available to allow the benefit of part or all of deferred tax asset to be utilized.

c. Transfer Pricing

The article no.13 of the Corporate Tax Law describes the issue of transfer pricing under the title of "disguised profit distribution" by way of transfer pricing. "The General Communique on Disguised Profit Distribution by way of Transfer Pricing" published on 18 November 2007 explains the application related issues in detail. According to this Communique, if the taxpayers conduct transactions like purchase and sale of goods or services with the related parties where the prices are not determined according to the arm's length principle, then it will be concluded that there is a disguised profit distribution by way of transfer pricing. Such disguised profit distributions will not be deducted from the corporate tax base for tax purposes. Disguised profit distribution amount will be recognized as share in net profit and stoppage tax will be calculated depending on whether the profit distributing institution is a real or corporate entity, full-fledged or foreign based taxpayer, is subject to or exempt from tax.

As discussed under subject Communique's "7.1 Annual Documentation" section, taxpayers are required to fill out the "Transfer Pricing, Controlled Foreign Entities and Thin Capitalization" form for the purchase and sale of goods or services conducted with their related parties in a taxation period, attach these forms to their corporate tax returns and submit to the tax offices.

XVIII. Explanations on borrowings

The Group, whenever required, generates funds from domestic and foreign sources in the form of borrowings, syndications, securitizations, and bill and bond issuances in the local and international markets. The funds borrowed are recorded at their purchase costs and valued at amortised costs using the effective interest method.

XIX. Explanation on issuance of equity securities

There are no issuance of equity securities in 2019.

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Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

XX. Explanations on guarantees and acceptances

The Group's letters of acceptances with its customers are simultaneously realized with customers' payments and are followed in off-balance sheet items.

XXI. Explanations on government incentives

As of the balance sheet date, there is no government grant for the Group.

XXII. Explanations on segment reporting

An operating segment is a component of an entity:

- **a.** That engages in business activities from which it may earn revenues and incur expenses (including revenues and expenses relating to transactions with other components of the same entity),
- **b.** Whose operating results are regularly reviewed by the entity's authorised decision maker for the purpose of taking decisions about resources to be allocated to the segment and assessing its performance, and
- c. For which discrete financial information is available.

Reporting according to the operational segment is presented in Note VIII of Section Four.

XXIII. Profit reserves and distribution of profit

Under the Turkish Commercial Code ("TCC"), legal reserves consist of first legal reserve and second legal reserve. First legal reserve, appropriated at the rate of 5%, until the total reserve is equal to 20% of issued and fully paid-in share capital. Second legal reserve, appropriated at the rate of at least 10% of distributions in excess of 5% of issued and fully paid-in share capital.

XXIV. Explanations on other disclosures

The accompanying financial statements as of 30 June 2019 are prepared and previous period financial statements are revised in accordance with the "Communique amending the Communique on the Financial Statements and Related Disclosures and Footnotes to be Announced to Public by Banks" published in the Official Gazette dated 1 February 2019 and effective starting from 1 January 2019.

XXV. Explanation on TFRS 16 leases standard

TFRS 16 Leases standard is published in the Official Gazette no. 29826 dated 16 April 2018 which is effective for the accounting periods after 31 December 2018.

The Group has started to apply the standard starting from 1 January 2019 for the first time. This standard is applied with modified retrospective approach recognizing the cumulative effect of initially applying the standard at the date of initial application. In this context, comparative financial statements are not restated.

The Group – as lessee:

The Group assesses whether a contract is (or contains) a lease at the inception of the contract. A contract is a lease contract or contains a lease on the basis of whether the right to control the use of an identified asset is being transferred for a period of time, against remuneration. In this case, at the commencement date, the right-of-use assets are recognized under "Tangible Assets" and lease liabilities are recognized under "Lease Payables" by the Group.

The Group initially measures the right-of-use asset applying a cost model in the financial statements and it includes the following:

- (a) Lease liabilities in the balance sheet, initially measured at the present value,
- (b) Remaining lease payment amount before or at the commencement date, after all lease incentives are eliminated,
- (c) All initial direct costs beared by the Group,
- (d) An estimate of costs to be incurred by the lessee in dismantling and removing the underlying asset, restoring the site on which it is located or restoring the underlying asset to the condition required by the terms and conditions of the lease.

The Group measures the right-of-use asset at cost less any accumulated depreciation and any accumulated impairment losses; and adjusted for any remeasurement of the lease liability.

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Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

XXV. Explanation on TFRS 16 leases standard (continued)

The Group applies the depreciation requirements in TAS 16 Property, Plant and Equipment in depreciating the right-of-use asset.

At the commencement date, the Group measures the lease liability at the present value of the lease payments that are not paid at that date.

The lease payments are discounted using the alternative borrowing interest rate in case of implicit interest rate cannot be defined easily.

At the commencement date, the lease payments included into the measurement of lease liabilities are composed of payments will be made during the underlying asset's lease term and payments that are not made at the commencement date are indicated below:

- (a) Remaining amount of fixed payments after elimination of any lease incentives receivable,
- (b) Variable future lease payments resulting from a change in an index or a rate used to determine those payments' initial measurement at the commencement date,
- (c) Amounts expected to be payable under a residual value guarantee by the Bank,
- (d) Purchasing option's cost if the Group is sure at a reasonable level that purchasing option will be used,
- (e) Payment of the fine due to the termination of the lease if the lease period refers to an option for the termination of the lease.

After the commencement date, the Group measures the lease liability as indicated below:

- (a) Measures the lease liability by increasing the carrying amount to reflect interest on the lease liability,
- (b) Measures the lease liability by reducing the carrying amount to reflect the lease payments made,
- (c) Remeasures the carrying amount to reflect any reassessment or lease modifications, or to reflect revised in-substance fixed lease.

Reclassifications and remeasurements during the first time application of TFRS 16 Leases Standard dated 1 January 2019 are presented in the table below:

		TFRS 16	TFRS 16	
	31 December 2018	Reclassification Effect	Measurement Effect	1 January 2019
Tangible assets(net) (*)	684,290	13,916	299,579	997,785
Other assets (**)	624,149	(13,916)	-	610,233
Lease liabilities (net) (***)	-	-	299,579	299,579

^(*) In accordance with TFRS 16, the Bank recognised a lease liability and a right-of-use asset amounting to TL 299,579 as of 1 January 2019 for leases previously accounted as an operating lease under TAS 17.

During the transition, the Group recognised lease liability concerning the lease which were previously recognised as operational leasing as per TAS 17. These liabilities were measured based on the discounted current value by using the alternative borrowing rate of interest of remaining lease payments as of 1 January 2019.

Short-term lease agreements with a duration of 12 months or less, have been evaluated within the scope of the exemption granted by the standard and their payments continue to be accounted as expense in the period they incur. Moreover, lease agreements with a remaining duration of 12 months or less as of 1 January 2019, have been evaluated within the scope of the same exemption. Within this scope, TL 7,591 has been paid in the relevant period.

Direct costs are not included while evaluating the right-of-use asset at the initial application date.

If a contract contains extention or termination terms, the Group management's judgement and assessment are used for the determination of useful life of right-of-use assets.

^(**) In accordance with TFRS 16, the Bank recognised prepaid lease expenses amounting to TL 13,916 under tangible assets as right-of-use assets which were previously classified under other assets.

^(***) As of 1 January 2019, the weighted average of the alternative borrowing interest rates applied to TL lease liabilities presented in the statement of financial position of the Bank is 17.60%.

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Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

Section four

Information on financial position and risk management of the Group

I. Explanations on consolidated capital

Information about consolidated capital items

Consolidated total capital and capital adequacy ratio has been calculated in accordance with the "Regulation on Equity of Banks" and "Regulation on Measurement and Assessment of Capital Adequacy of Banks."

As of 30 June 2019, the Group's total capital is TL 12,162,851 and the consolidated capital adequacy ratio is 23.68%. As of 31 December 2018, the Group's total capital amounted to TL 11,386,129 and capital adequacy ratio was 21.11%.

		Amount related t implementatio befor
COMMON EQUITY Tier I Capital	Current period	01.01.2014 (
Paid-in capital to be entitled for compensation after all creditors Share premium	3,486,268	
orac premium .eaal reserves	3,446,286	
Other comprehensive income according to TAS	146,679	
rofit	930,239	
let profit for the period	930,239	
Prior period profit	-	
Sonus shares from investments in associates, subsidiaries and joint ventures that are not recognized in profit	-	
Minority interest Common equity tier I capital before deductions	8,009,472	
Deductions from common equity	0,009,472	
/aluation adjustments calculated as per the article 9. (i) of the Regulation on the Capital of Banks		
Portion of the current and prior periods' losses not covered by reserves and losses accounted under equity as per TAS	7,480	
Leasehold improvements on operational leases (-)	35,587	
Goodwill netted off deferred tax liability (-)	-	
Other intangibles netted off deferred tax liability except for mortgage servicing rights	42,964	42.9
Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability)	-	,-
Differences not recognized at the fair value of assets and liabilities subject to hedge of cash flow risk	-	
Portion of the total expected loss amount calculated as per Communiqué on Calculation of Credit Risk with the Internal Rating Based Approach,		
which exceeds total provisions	-	
Gains arising from securitization transactions	-	
Jnrealized gains and losses due to changes in own credit risk on fair value of Bank's liabilities	-	
Net amount of defined-benefit plan assets	-	
Direct and indirect investments of the Bank in its own Common Equity Tier I Capital	-	
Shares obtained contrary to the 4 th clause of the 56 th Article of the Law	-	
Portion of the total of net long positions of investments made in equity items of banks and financial institutions outside the scope of consolidation		
where the Bank owns 10% or less of the issued common share capital, which exceeds 10% of common equity of the Bank (-)	-	
Portion of the total of net long positions of investments made in equity items of banks and financial institutions outside the scope of consolidation where the Bank owns 10% or more of the issued common share capital, which exceeds 10% of common equity of the Bank (-)		
where the bank owns 10% of more of the issued common share capital, which exceeds 10% of common equity of the bank (-) Portion of mortgage servicing rights exceeding 10% of the common equity (-)	-	
Contion of inforgage servicing ingrise scheduling 10% of the comminion equity (-) Ortion of deferred tax assets based on temporary differences exceeding 10% of the common equity (-)	-	
Amounts exceeding 15% of the common equity as per the 2 nd clause of the provisional article 2 of the Regulation on the Equity of Banks (-)	-	
Excess amount arising from the net long positions of investments in common equity items of banks and financial institutions outside the scope		
of consolidation where the Bank owns 10% or more of the issued common share capital (-)	_	
excess amount arising from mortgage servicing rights (-)	_	
Excess amount arising from deferred tax assets based on temporary differences (-)	-	
Other items to be defined by the BRSA (-)	-	
Deductions to be made from common equity in case adequate additional Tier I capital or Tier II capital is not available (-)	-	
Total deductions from common equity tier I capital	86,031	
Fotal common equity tier I capital	7,923,441	
ADDITIONAL TIER I CAPITAL		
Preferred stock not included in common equity tier I capital and the related share premiums	-	
Debt instruments and premiums approved by BRSA	-	
Debt instruments and premiums approved by BRSA (in scope of Temporary Article 4)	-	
Third parties' share in the Additional Tier I capital	-	
Third parties' share in the Additional Tier I capital (in scope of Temporary Article 3)		
Additional Tier I capital before deductions	-	
Deductions from additional Tier I capital Bank's direct and indirect investments in its own Additional Tier I capital (-)	-	
nvestments in equity instruments is used by banks and financial institutions that have invested in Bank's additional Tier I Capital, which are	-	
resuments in equity institutients issued by barns and infancial institutions that have invested in pairs additional field Capital, which are compatible with Article 7 of the regulation		
Portion of total Net Long Positions of the Investments in Equity Items of Unconsolidated Banks and Financial Institutions where the Bank Owns	-	
10% or less of the Issued Share Capital, which Exceeds 10% of Bank's Tier I Capital	_	
The Total of Net Long Positions of the Direct or Indirect Investments in Additional Tier I Capital of Unconsolidated Banks and Financial		
Institutions where the Bank Owns more than 10% of the Issued Share Capital		
	-	
Other items to be defined by the BRSA	-	
tems continuing to be deducted from Tier I Capital during the Transition Period		
tems continuing to be deducted from Tier I Capital during the Transition Period	-	
tems continuing to be deducted from Tier I Capital during the Transition Period Portion of the goodwill and other intangible assets and related deferred tax liabilities which will not be deducted from Common Equity Tier I capital as per the first sub-paragraph of the Provisional Article 2 of the Regulation on the Equity of Banks (-) Portion of the net deferred tax asset/liability not deducted from Common Equity Tier I capital as per the first sub-paragraph of the Provisional	-	
tems continuing to be deducted from Tier I Capital during the Transition Period Portion of the goodwill and other intangible assets and related deferred tax liabilities which will not be deducted from Common Equity Tier I capital as per the first sub-paragraph of the Provisional Article 2 of the Regulation on the Equity of Banks (-) Portion of the net deferred tax asset/liability not deducted from Common Equity Tier I capital as per the first sub-paragraph of the Provisional Article 2 of the Regulation on the Equity of Banks (-)	-	
tems continuing to be deducted from Tier I Capital during the Transition Period Portion of the goodwill and other intangible assets and related deferred tax liabilities which will not be deducted from Common Equity Tier I capital as per the first sub-paragraph of the Provisional Article 2 of the Regulation on the Equity of Banks (-) Portion of the net deferred tax asset/liability not deducted from Common Equity Tier I capital as per the first sub-paragraph of the Provisional Article 2 of the Regulation on the Equity of Banks (-)	- - -	
Portion of the net deferred tax asset/liability not deducted from Common Equity Tier I capital as per the first sub-paragraph of the Provisional	- - -	
tems continuing to be deducted from Tier I Capital during the Transition Period Portion of the goodwill and other intangible assets and related deferred tax liabilities which will not be deducted from Common Equity Tier I capital as per the first sub-paragraph of the Provisional Article 2 of the Regulation on the Equity of Banks (-) Portion of the net deferred tax asset/liability not deducted from Common Equity Tier I capital as per the first sub-paragraph of the Provisional Article 2 of the Regulation on the Equity of Banks (-) Deductions to be made from common equity in case adequate Additional Tier I Capital or Tier II Capital is not available (-) Total deductions from additional Tier I capital	- - - -	
tems continuing to be deducted from Tier I Capital during the Transition Period Portion of the goodwill and other intangible assets and related deferred tax liabilities which will not be deducted from Common Equity Tier I capital as per the first sub-paragraph of the Provisional Article 2 of the Regulation on the Equity of Banks (-) Portion of the net deferred tax asset/liability not deducted from Common Equity Tier I capital as per the first sub-paragraph of the Provisional Article 2 of the Regulation on the Equity of Banks (-) Deductions to be made from common equity in case adequate Additional Tier I Capital or Tier II Capital is not available (-)	- - - - 7,923,441	

^(*) Amounts represent the amounts of items to be taken into consideration and subject to transition provisions in accordance with Temporary Articles of "Regulation on the Equity of Banks".

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

I. Explanations on consolidated capital (continued)

	Current period	Amount related to implementation before 01.01.2014 (*)
TIER II CAPITAL	poou	
Bank's borrowing instruments and issue premiums	3,683,226	
Bank's borrowing instruments and issue premiums (in scope of Temporary Article 4)		
Third parties' share in the Tier II Capital	-	
Fhird parties' share in the Tier II Capital (in scope of Temporary Article 3)	-	
Provisions (amounts stated in Article 8 of the Regulation on the Equity of Banks)	562,984	
Tier II Capital Before Deductions	4,246,210	
Deductions From Tier II Capital		
Bank's direct and indirect investments in its own Tier II Capital (-)	-	
Bank's investments in in equity instruments issued by banks and financial institutions that have invested in Bank's additional Tier I		
Capital, which are compatible with Article 8 of the regulation.	-	
Portion of total Net Long Positions of the Investments in Equity Items of Unconsolidated Banks and Financial Institutions where the		
Bank Owns 10% or less of the Issued Share Capital, which Exceeds 10% of Bank's Tier I Capital (-)	-	
The Total of Net Long Positions of the Direct or Indirect Investments in Additional Tier I Capital of Unconsolidated Banks and Financial		
Institutions where the Bank Owns more than 10% of the Issued Share Capital	=	
Other items to be defined by the BRSA (-)	-	
Total Deductions from Tier II Capital	-	
Total Tier II Capital	4,246,210	
Total Capital (The sum of Tier I Capital and Tier II Capital)	12,169,651	
Total of Core Capital and Additional Capital (Total equities)		
Loans granted against Article 50 and 51 of Banking Law	-	
Net Book Values of Movables and Immovables Exceeding the Limit Defined in Article 57, Clause 1 of the Banking Law and of Assets		
Acquired against Overdue Receivables and Held for Sale but Retained more than three Years	-	
Other items to be defined by the BRSA (-)	6,800	
Items to be deducted from the sum of Tier I and Tier II Capital (Capital) during transition period		
Portion of total Net Long Positions of the Investments in Equity Items of Unconsolidated Banks and Financial Institutions where the		
Bank Owns 10% or less of the Issued Share Capital, exceeding 10% of Bank's Tier I Capital, which is not deducted from Tier I,		
Tier II and additional capital as per Temporary Article 2 of the Regulation on the Equity of Banks	-	
Portion of total Net Long Positions of the Investments in Equity Items of Unconsolidated Banks and Financial Institutions where the		
Bank Owns 10% or less of the Issued Share Capital, exceeding 10% of Bank's Tier I Capital, which is not deducted from the tier II		
capital and additional capital as per Temporary Article 2 of the Regulation on the Equity of Banks (-)	-	
Portion of the total of net long positions of investments made in the common equity items of banks and financial institutions outside		
the scope of consolidation where the bank owns 10% or more of the issued common share capital, deferred tax assets based on		
temporary differences and mortgage servicing rights not deducted from Common Equity as per paragraph 1 and 2 of Provisional		
Article 2 of the Regulation on the Equity of Banks (-)	-	
TOTAL CAPITAL		
TOTAL DAI TIAL		
Total Capital	12,162,851	
Total Capital Total risk weighted amounts	12,162,851 51,353,985	
Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS		
Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%)		
Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%)	51,353,985 15.43 15.43	
Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Capital Adequacy Ratio (%)	51,353,985 15.43	
Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Capital Adequacy Ratio (%)	51,353,985 15.43 15.43	
Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Buffers Total buffer requirement	51,353,985 15.43 15.43	
Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Buffers	51,353,985 15.43 15.43 23.68	
Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) BUFFERS Total buffer requirement Capital protection buffer requirement (%) Bank specific cyclical buffer requirement (%)	51,353,985 15.43 15.43 23.68 2.582	
Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Buffers Total buffer requirement Capital protection buffer requirement (%) Bank specific cyclical buffer requirement (%) Systemically important banks buffer ratio (%)	51,353,985 15.43 15.43 23.68 2.582 2.500	
Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Buffers Total buffer requirement Capital protection buffer requirement (%) Bank specific cyclical buffer requirement (%) Systemically important banks buffer ratio (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital	51,353,985 15.43 15.43 23.68 2.582 2.500	
Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) BUFFERS Total buffer requirement Capital protection buffer requirement (%) Bank specific cyclical buffer requirement (%) Systemically important banks buffer ratio (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%)	51,353,985 15.43 15.43 23.68 2.582 2.500	
Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Bufferss Total buffer requirement Capital protection buffer requirement (%) Bank specific cyclical buffer requirement (%) Systemically important banks buffer ratio (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Amounts below the Excess Limits as per the Deduction Principles	51,353,985 15.43 15.43 23.68 2.582 2.500 0.082	
Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS CORE Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Buffer Requirement Capital Protection buffer requirement (%) Bank specific cyclical buffer requirement (%) Systemically important banks buffer ratio (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Amounts below the Excess Limits as per the Deduction Principles Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where	51,353,985 15.43 15.43 23.68 2.582 2.500 0.082	
Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Buffers Total buffer requirement Capital protection buffer requirement (%) Bank specific cyclical buffer requirement (%) Bank specific cyclical buffer requirement (%) Systemically important banks buffer ratio (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Amounts below the Excess Limits as per the Deduction Principles Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or less of the issued share capital	51,353,985 15.43 15.43 23.68 2.582 2.500 0.082	
Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Buffers Total buffer requirement Capital protection buffer requirement (%) Bank specific cyclical buffer requirement (%) Systemically important banks buffer ratio (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Amounts below the Excess Limits as per the Deduction Principles Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or less of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where	51,353,985 15.43 15.43 23.68 2.582 2.500 0.082	
Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) BuFFERS Total buffer requirement Capital protection buffer requirement (%) Bank specific cyclical buffer requirement (%) Bank specific cyclical buffer requirement (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Amounts below the Excess Limits as per the Deduction Principles Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or less of the issued share capital	51,353,985 15.43 15.43 23.68 2.582 2.500 0.082	
Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Ball FERS Total buffer requirement Capital protection buffer requirement (%) Bank specific cyclical buffer requirement (%) Systemically important banks buffer ratio (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Amounts below the Excess Limits as per the Deduction Principles Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or less of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or rore of the issued share capital	51,353,985 15.43 15.43 23.68 2.582 2.500 0.082	
Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Buffers Total buffer requirement Capital protection buffer requirement (%) Bank specific cyclical buffer requirement (%) Systemically important banks buffer ratio (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Amounts below the Excess Limits as per the Deduction Principles Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or less of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital Montragage Servicing Rights	51,353,985 15.43 15.43 23.68 2.582 2.500 0.082	
Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Bus Fers Total buffer requirement Capital protection buffer requirement (%) Bank specific cyclical buffer requirement (%) Systemically important banks buffer ratio (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Amounts below the Excess Limits as per the Deduction Principles Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or less of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital Mortgage Servicing Rights Amount arising from deferred tax assets based on temporary differences	51,353,985 15,43 15,43 23,68 2,582 2,500 0,082 - 9,429	
Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Bark specific cyclical buffer requirement (%) Bank specific cyclical buffer requirement (%) Bank specific cyclical buffer requirement (%) Systemically important banks buffer ratio (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Amounts below the Excess Limits as per the Deduction Principles Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or less of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital Mortgage Servicing Rights Amount arising from deferred tax assets based on temporary differences Limits related to provisions considered in Tier II calculation General provisions for standard based receivables (before ten thousand twenty five limitation)	51,353,985 15,43 15,43 23,68 2,582 2,500 0,082 - 9,429	
Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Bufferss Total buffer requirement Capital protection buffer requirement (%) Bank specific cyclical buffer requirement (%) Systemically important banks buffer ratio (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Amounts below the Excess Limits as per the Deduction Principles Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or less of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where	51,353,985 15.43 15.43 23.68 2.582 2.500 0.082 - 9.429	
Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Balty FERS Total buffer requirement Capital protection buffer requirement (%) Bank specific cyclical buffer requirement (%) Systemically important banks buffer ratio (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Amounts below the Excess Limits as per the Deduction Principles Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or less of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital Mortgage Servicing Rights Amount arising from deferred tax assets based on temporary differences Limits related to provisions considered in Tier II calculation General provisions for standard based receivables (before ten thousand twenty five limitation)	51,353,985 15,43 15,43 23,68 2,582 2,500 0,082 - 9,429 - 162,722 578,427	
Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Buffers Total buffer requirement Capital protection buffer requirement (%) Bank specific cyclical buffer requirement (%) Systemically important banks buffer ratio (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Amounts below the Excess Limits as per the Deduction Principles Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or less of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital Mortgage Servicing Rights Amount arising from deferred tax assets based on temporary differences Limits related to provisions considered in Tier II calculation General provisions for standard based receivables (before ten thousand twenty five limitation) Up to 1.25% of total risk-weighted amount of general reserves for receivables where the standard approach used	51,353,985 15,43 15,43 23,68 2,582 2,500 0,082 - 9,429 - 162,722 578,427	
Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Ball Adequacy Ratio (%) Buffer Requirement Capital Protection buffer requirement (%) Bank specific cyclical buffer requirement (%) Systemically important banks buffer ratio (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Amounts below the Excess Limits as per the Deduction Principles Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or less of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital Mortgage Servicing Rights Amount arising from deferred tax assets based on temporary differences Limits related to provisions considered in Tier II calculation General provisions for standard based receivables (before ten thousand twenty five limitation) Up to 1.25% of total risk-weighted amount of general reserves for receivables where the standard approach used Amount of total provision exceeding the total expected loss amount calculated according to the Communiqué on the Calculation of	51,353,985 15,43 15,43 23,68 2,582 2,500 0,082 - 9,429 - 162,722 578,427	
Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Bair I Capital Adequacy Ratio (%) Buffers Total buffer requirement Capital protection buffer requirement (%) Bank specific cyclical buffer requirement (%) Systemically important banks buffer ratio (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Amounts below the Excess Limits as per the Deduction Principles Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or less of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital Mortgage Servicing Rights Amount arising from deferred tax assets based on temporary differences Limits related to provisions considered in Tier II calculation General provisions for standard based receivables (before ten thousand twenty five limitation) Up to 1.25% of total risk-weighted amount of general reserves for receivables where the standard approach used Amount of total provision exceeding the total expected loss amount calculated according to the Communique on the Calculation of the Credit Risk Based Amount as per the Internal Ratings Based Approach	51,353,985 15,43 15,43 23,68 2,582 2,500 0,082 - 9,429 - 162,722 578,427	
Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Ball Adequacy Ratio (%) Buffer Requirement Capital protection buffer requirement (%) Bank specific cyclical buffer requirement (%) Systemically important banks buffer ratio (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Amounts below the Excess Limits as per the Deduction Principles Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or less of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital Mortgage Servicing Rights Amount arising from deferred tax assets based on temporary differences Limits related to provisions considered in Tier II calculation General provisions for standard based receivables (before ten thousand twenty five limitation) Up to 1.25% of total risk-weighted amount of general reserves for receivables where the standard approach used Amount of total provision exceeding the total expected loss amount calculated according to the Communiqué on the Credit Risk Based Amount as per the Internal Ratings Based Approach Amount of the Credit Risk Based Amount as per the Internal Ratings Based Approach on the Calculation of the Credit Risk Based Amount as per the Internal Ratings Based Approach	51,353,985 15,43 15,43 23,68 2,582 2,500 0,082 - 9,429 - 162,722 578,427	
Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Bark specific cyclical buffer requirement Capital protection buffer requirement (%) Bank specific cyclical buffer requirement (%) Systemically important banks buffer ratio (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Amounts below the Excess Limits as per the Deduction Principles Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or less of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital Mortgage Servicing Rights Amount arising from deferred tax assets based on temporary differences Limits related to provisions considered in Tier II calculation General provisions for standard based receivables (before ten thousand twenty five limitation) Up to 1.25% of total risk-weighted amount of general reserves for receivables where the standard approach used Amount of total provision exceeding the total expected loss amount calculated according to the Communiqué on the Calculation of the Credit Risk Based Amount as per the Internal Ratings Based Approach Amount of total provision of total provision exceeding the total expected loss amount calculated according to the Communiqué on the Calculation of the Credit Risk Based Amount as per the Internal Ratings Based Approach Amount of total provision of total provision exceeding the total expected loss amount calculated according to the Communiqué on the Calculation of the Credit Risk Based Amount as per the Internal Ratings Based Approach	51,353,985 15,43 15,43 23,68 2,582 2,500 0,082 - 9,429 - 162,722 578,427	
Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Bart Capital Adequacy Ratio (%) Buffers Total buffer requirement Capital protection buffer requirement (%) Bank specific cyclical buffer requirement (%) Systemically important banks buffer ratio (%) Bank specific cyclical buffer requirement (%) Systemically important banks buffer ratio (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Amounts below the Excess Limits as per the Deduction Principles Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or less of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital Mortgage Servicing Rights Amount arising from deferred tax assets based on temporary differences Limits related to provisions considered in Tier II calculation General provisions for standard based receivables (before ten thousand twenty five limitation) Up to 1.25% of total risk-weighted amount of general reserves for receivables where the standard approach used Amount of total provision exceeding the total expected loss amount calculated according to the Communique on the Calculation of the Credit Risk Based Amount as per the Internal Ratings Based Approach Amount up to 0.6% of the portion of total provision exceeding the total expected loss amount calculated according to the Communique on the Calculation of the Credit Risk Based Amount as per the Internal Ratings Based Approach Debt instruments subject to Temporary Article 4 (to be implemented between 1 January 2018 and 1 January 2022) Upper limit for Additional Tier I Capital subject to Temporary Ar	51,353,985 15,43 15,43 23,68 2,582 2,500 0,082 - 9,429 - 162,722 578,427	
Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Bark specific cyclical buffer requirement (%) Bank specific cyclical buffer requirement (%) Systemically important banks buffer ratio (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Amounts below the Excess Limits as per the Deduction Principles Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or less of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital Mortgage Servicing Rights Amount arising from deferred tax assets based on temporary differences Limits related to provisions considered in Tier II calculation General provisions for standard based receivables (before ten thousand twenty five limitation) Up to 1.25% of total risk-weighted amount of general reserves for receivables where the standard approach used Amount of total provision exceeding the total expected loss amount calculated according to the Communiqué on the Calculation of the Credit Risk Based Amount as per the Internal Ratings Based Approach Amount of total provision of total provision exceeding the total expected loss amount calculated according to the Communiqué on the Calculation of the Credit Risk Based Amount as per the Internal Ratings Based Approach Amount of total provision of total provision exceeding the total expected loss amount calculated according to the Communiqué on the Calculation of the Credit Risk Based Amount as per the Internal Ratings Based Approach	51,353,985 15,43 15,43 23,68 2,582 2,500 0,082 - 9,429 - 162,722 578,427	

^(*) Amounts represent the amounts of items to be taken into consideration and subject to transition provisions in accordance with Temporary Articles of "Regulation on the Equity of Banks".

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

I. Explanations on consolidated capital (continued)

	Prior period	Amount related to implementation before 01.01.2014 (*
COMMON EQUITY Tier I Capital	•	20.0.0 0
Paid-in capital to be entitled for compensation after all creditors Share premium	3,486,268	
State premium Legal reserves	2.297.792	
Other comprehensive income according to TAS	143,375	
Profit	1,140,634	
Net profit for the period	1,140,634	
Prior period profit	-	
Bonus shares from investments in associates, subsidiaries and joint ventures that are not recognized in profit Minority interest	-	
Common equity tier I capital before deductions	7,068,069	
Deductions from common equity		
Valuation adjustments calculated as per the article 9. (i) of the Regulation on the Capital of Banks	-	
Portion of the current and prior periods' losses not covered by reserves and losses accounted under equity as per TAS Leasehold improvements on operational leases (-)	13,421 39.962	
Leasenou improvements on operational leases (-) Goodwill netted off deferred tax liability (-)	39,902	
Other intangibles netted off deferred tax liability except for mortgage servicing rights	37,209	37,20
Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability)	-	,
Differences not recognized at the fair value of assets and liabilities subject to hedge of cash flow risk	-	
Portion of the total expected loss amount calculated as per Communiqué on Calculation of Credit Risk with the Internal Rating		
Based Approach, which exceeds total provisions	-	
Gains arising from securitization transactions Unrealized gains and losses due to changes in own credit risk on fair value of Bank's liabilities	-	
Net amount of defined-benefit plan assets	-	
Direct and indirect investments of the Bank in its own Common Equity Tier I Capital	-	
Shares obtained contrary to the 4 th clause of the 56 th Article of the Law	-	
Portion of the total of net long positions of investments made in equity items of banks and financial institutions outside the scope of consolidation where the Bank owns 10% or less of the issued common share capital, which exceeds 10% of common equity of the Bank (-)		
Portion of the total of net long positions of investments made in equity items of banks and financial institutions outside the scope of	-	
consolidation where the Bank owns 10% or more of the issued common share capital, which exceeds 10% of common equity of the Bank (-)	_	
Portion of mortgage servicing rights exceeding 10% of the common equity (-)	-	
Portion of deferred tax assets based on temporary differences exceeding 10% of the common equity (-)	-	
Amounts exceeding 15% of the common equity as per the 2 nd clause of the provisional article 2 of the Regulation on the Equity of		
Banks (-)	-	
Excess amount arising from the net long positions of investments in common equity items of banks and financial institutions outside the scope of consolidation where the Bank owns 10% or more of the issued common share capital (-)		
The scape of consolidation where the Ballix owns 10% of more of the issued continion share capital (-) Excess amount arising from mortgage servicing rights (-)		
Excess amount arising from deferred tax assets based on temporary differences (-)	-	
Other items to be defined by the BRSA (-)	-	
Deductions to be made from common equity in case adequate additional Tier I capital or Tier II capital is not available (-)	-	
Total deductions from common equity tier I capital	90,592	
Total common equity tier I capital	6,977,477	
ADDITIONAL TIER I CAPITAL Preferred Stock not included in common equity tier i capital and the related share premiums		
Debt instruments and premiums approved by BRSA	-	
Debt instruments and premiums approved by BRSA (in scope of Temporary Article 4)	-	
Third parties' share in the Additional Tier I capital	-	
	-	
Additional Tier I capital before deductions	-	
Additional Tier I capital before deductions Deductions from additional Tier I capital	-	
Additional Tier I capital before deductions Deductions from additional Tier I capital Bank's direct and indirect investments in its own Additional Tier I capital (-)	-	
Additional Tier I capital before deductions Deductions from additional Tier I capital Bank's direct and indirect investments in its own Additional Tier I capital (-) Investments in equity instruments issued by banks and financial institutions that have invested in Bank's additional Tier I Capital,	-	
Additional Tier I capital before deductions Deductions from additional Tier I capital Bank's direct and indirect investments in its own Additional Tier I capital (-) Investments in equity instruments issued by banks and financial institutions that have invested in Bank's additional Tier I Capital, which are compatible with Article 7 of the regulation	- -	
Additional Tier I capital before deductions Deductions from additional Tier I capital Bank's direct and indirect investments in its own Additional Tier I capital (-) Investments in equity instruments issued by banks and financial institutions that have invested in Bank's additional Tier I Capital, which are compatible with Article 7 of the regulation Portion of total Net Long Positions of the Investments in Equity Items of Unconsolidated Banks and Financial Institutions where the Bank Owns 10% or less of the Issued Share Capital, which Exceeds 10% of Bank's Tier I Capital	- - -	
Additional Tier I capital before deductions Deductions from additional Tier I capital Bank's direct and indirect investments in its own Additional Tier I capital (-) Investments in equity instruments issued by banks and financial institutions that have invested in Bank's additional Tier I Capital, which are compatible with Article 7 of the regulation Portion of total Net Long Positions of the Investments in Equity Items of Unconsolidated Banks and Financial Institutions where the Bank Owns 10% or less of the Issued Share Capital, which Exceeds 10% of Bank's Tier I Capital The Total of Net Long Positions of the Direct or Indirect Investments in Additional Tier I Capital of Unconsolidated Banks and	-	
Additional Tier I capital before deductions Deductions from additional Tier I capital Bank's direct and indirect investments in its own Additional Tier I capital (-) Investments in equity instruments issued by banks and financial institutions that have invested in Bank's additional Tier I Capital, which are compatible with Article 7 of the regulation Portion of total Net Long Positions of the Investments in Equity Items of Unconsolidated Banks and Financial Institutions where the Bank Owns 10% or less of the Issued Share Capital, which Exceeds 10% of Bank's Tier I Capital The Total of Net Long Positions of the Direct or Indirect Investments in Additional Tier I Capital of Unconsolidated Banks and Financial Institutions where the Bank Owns more than 10% of the Issued Share Capital	- - - -	
Additional Tier I capital before deductions Deductions from additional Tier I capital Bank's direct and indirect investments in its own Additional Tier I capital (-) Investments in equity instruments issued by banks and financial institutions that have invested in Bank's additional Tier I Capital, which are compatible with Article 7 of the regulation Portion of total Net Long Positions of the Investments in Equity Items of Unconsolidated Banks and Financial Institutions where the Bank Owns 10% or less of the Issued Share Capital, which Exceeds 10% of Bank's Tier I Capital The Total of Net Long Positions of the Direct or Indirect Investments in Additional Tier I Capital of Unconsolidated Banks and Financial Institutions where the Bank Owns more than 10% of the Issued Share Capital Other items to be defined by the BRSA	- - - -	
Additional Tier I capital before deductions Deductions from additional Tier I capital Bank's direct and indirect investments in its own Additional Tier I capital (-) Investments in equity instruments issued by banks and financial institutions that have invested in Bank's additional Tier I Capital, which are compatible with Article 7 of the regulation Portion of total Net Long Positions of the Investments in Equity Items of Unconsolidated Banks and Financial Institutions where the Bank Owns 10% or less of the Issued Share Capital, which Exceeds 10% of Bank's Tier I Capital The Total of Net Long Positions of the Direct or Indirect Investments in Additional Tier I Capital of Unconsolidated Banks and Financial Institutions where the Bank Owns more than 10% of the Issued Share Capital Other items to be defined by the BRSA Items continuing to be deducted from Tier I Capital during the Transition Period	-	
Additional Tier I capital before deductions Deductions from additional Tier I capital Bank's direct and indirect investments in its own Additional Tier I capital (-) Investments in equity instruments issued by banks and financial institutions that have invested in Bank's additional Tier I Capital, which are compatible with Article 7 of the regulation Portion of total Net Long Positions of the Investments in Equity Items of Unconsolidated Banks and Financial Institutions where the Bank Owns 10% or less of the Issued Share Capital, which Exceeds 10% of Bank's Tier I Capital The Total of Net Long Positions of the Direct or Indirect Investments in Additional Tier I Capital of Unconsolidated Banks and Financial Institutions where the Bank Owns more than 10% of the Issued Share Capital Other items to be defined by the BRSA Items continuing to be deducted from Tier I Capital during the Transition Period Portion of the goodwill and other intangible assets and related deferred tax liabilities which will not be deducted from Common	-	
Additional Tier I capital before deductions Deductions from additional Tier I capital Bank's direct and indirect investments in its own Additional Tier I capital (-) Investments in equity instruments issued by banks and financial institutions that have invested in Bank's additional Tier I Capital, which are compatible with Article 7 of the regulation Portion of total Net Long Positions of the Investments in Equity Items of Unconsolidated Banks and Financial Institutions where the Bank Owns 10% or less of the Issued Share Capital, which Exceeds 10% of Bank's Tier I Capital The Total of Net Long Positions of the Direct or Indirect Investments in Additional Tier I Capital of Unconsolidated Banks and Financial Institutions where the Bank Owns more than 10% of the Issued Share Capital Other items to be defined by the BRSA Items continuing to be deducted from Tier I Capital during the Transition Period Portion of the goodwill and other intangible assets and related deferred tax liabilities which will not be deducted from Common Equity Tier I capital as per the first sub-paragraph of the Provisional Article 2 of the Regulation on the Equity of Banks (-)	-	
Additional Tier I capital before deductions Deductions from additional Tier I capital Bank's direct and indirect investments in its own Additional Tier I capital (-) Investments in equity instruments issued by banks and financial institutions that have invested in Bank's additional Tier I Capital, which are compatible with Article 7 of the regulation Portion of total Net Long Positions of the Investments in Equity Items of Unconsolidated Banks and Financial Institutions where the Bank Owns 10% or less of the Issued Share Capital, which Exceeds 10% of Bank's Tier I Capital The Total of Net Long Positions of the Direct or Indirect Investments in Additional Tier I Capital of Unconsolidated Banks and Financial Institutions where the Bank Owns more than 10% of the Issued Share Capital Other items to be defined by the BRSA Items continuing to be deducted from Tier I Capital during the Transition Period Portion of the goodwill and other intangible assets and related deferred tax liabilities which will not be deducted from Common Equity Tier I capital as per the first sub-paragraph of the Provisional Article 2 of the Regulation on the Equity of Banks (-) Portion of the net deferred tax asseviliability not deducted from Common Equity Tier I capital as per the first sub-paragraph of the Provisional Article 2 of the Regulation on the Equity of Banks (-)	-	
Additional Tier I capital before deductions Deductions from additional Tier I capital Bank's direct and indirect investments in its own Additional Tier I capital (-) Investments in equity instruments issued by banks and financial institutions that have invested in Bank's additional Tier I Capital, which are compatible with Article 7 of the regulation Portion of total Net Long Positions of the Investments in Equity Items of Unconsolidated Banks and Financial Institutions where the Bank Owns 10% or less of the Issued Share Capital, which Exceeds 10% of Bank's Tier I Capital The Total of Net Long Positions of the Direct or Indirect Investments in Additional Tier I Capital of Unconsolidated Banks and Financial Institutions where the Bank Owns more than 10% of the Issued Share Capital Other items to be defined by the BRSA Items continuing to be deducted from Tier I Capital during the Transition Period Portion of the goodwill and other intangible assets and related deferred tax liabilities which will not be deducted from Common Equity Tier I capital as per the first sub-paragraph of the Provisional Article 2 of the Regulation on the Equity of Banks (-) Portion of the net deferred tax asset/liability not deducted from Common Equity Tier I capital as per the first sub-paragraph of the Provisional Article 2 of the Regulation on the Equity of Banks (-) Deductions to be made from common equity in case adequate Additional Tier I Capital or Tier II Capital is not available (-)	-	
Portion of total Net Long Positions of the Investments in Equity Items of Unconsolidated Banks and Financial Institutions where the Bank Owns 10% or less of the Issued Share Capital, which Exceeds 10% of Bank's Tier I Capital The Total of Net Long Positions of the Direct or Indirect Investments in Additional Tier I Capital of Unconsolidated Banks and Financial Institutions where the Bank Owns more than 10% of the Issued Share Capital Other items to be defined by the BRSA Items continuing to be deducted from Tier I Capital during the Transition Period Portion of the goodwill and other intangible assets and related deferred tax liabilities which will not be deducted from Common Equity Tier I capital as per the first sub-paragraph of the Provisional Article 2 of the Regulation on the Equity of Banks (-) Portion of the net deferred tax asset/liability not deducted from Common Equity Tier I capital as per the first sub-paragraph of the	- - - - - - -	
Additional Tier I capital before deductions Deductions from additional Tier I capital Bank's direct and indirect investments in its own Additional Tier I capital (-) Investments in equity instruments issued by banks and financial institutions that have invested in Bank's additional Tier I Capital, which are compatible with Article 7 of the regulation Portion of total Net Long Positions of the Investments in Equity Items of Unconsolidated Banks and Financial Institutions where the Bank Owns 10% or less of the Issued Share Capital, which Exceeds 10% of Bank's Tier I Capital The Total of Net Long Positions of the Direct or Indirect Investments in Additional Tier I Capital of Unconsolidated Banks and Financial Institutions where the Bank Owns more than 10% of the Issued Share Capital Other items to be defined by the BRSA Items continuing to be deducted from Tier I Capital during the Transition Period Portion of the goodwill and other intangible assets and related deferred tax liabilities which will not be deducted from Common Equity Tier I capital as per the first sub-paragraph of the Provisional Article 2 of the Regulation on the Equity of Banks (-) Portion of the net deferred tax asset/liability not deducted from Common Equity Tier I capital as per the first sub-paragraph of the Provisional Article 2 of the Regulation on the Equity of Banks (-) Deductions to be made from common equity in case adequate Additional Tier I Capital or Tier II Capital is not available (-)	- - - - - - - -	

^(*) Amounts represent the amounts of items to be taken into consideration and subject to transition provisions in accordance with Temporary Articles of "Regulation on the Equity of Banks".

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

I. Explanations on consolidated capital (continued)

	Drior	Amount related to
TIER II CAPITAL	Prior period	before 01.01.2014 (
Bank's borrowing instruments and issue premiums	3,807,119	
Bank's borrowing instruments and issue premiums (in scope of Temporary Article 4)	-	
hird parties' share in the Tier II Capital	-	
Fhird parties' share in the Tier II Capital (in scope of Temporary Article 3)	-	
Provisions (amounts stated in Article 8 of the Regulation on the Equity of Banks)	609,455	
Fier II Capital Before Deductions	4,416,574	
Deductions From Tier II Capital		
Bank's direct and indirect investments in its own Tier II Capital (-)	-	
Bank's investments in in equity instruments issued by banks and financial institutions that have invested in Bank's additional Tier I		
Capital, which are compatible with Article 8 of the regulation. Portion of total Net Long Positions of the Investments in Equity Items of Unconsolidated Banks and Financial Institutions where the	-	
Bank Owns 10% or less of the Issued Share Capital, which Exceeds 10% of Bank's Tier I Capital (-)	_	
The Total of Net Long Positions of the Direct or Indirect Investments in Additional Tier I Capital of Unconsolidated Banks and	_	
Financial Institutions where the Bank Owns more than 10% of the Issued Share Capital	_	
Other items to be defined by the BRSA (-)	_	
Total Deductions from Tier II Capital	-	
Total Tier II Capital	4,416,574	
Fetal Oscillat /The course of Tirot Oscillat and Tirott Oscillati	44 004 054	
Total Capital (The sum of Tier I Capital and Tier II Capital) Total of Core Capital and Additional Capital (Total equities)	11,394,051	
Loans granted against Article 50 and 51 of Banking Law	-	
Does by Griffed a garlist rule of an U.S. of the Book Values of Movables and Immovables Exceeding the Limit Defined in Article 57, Clause 1 of the Banking Law and of	-	
Assets Acquired against Overdue Receivables and Held for Sale but Retained more than Five Years	_	
Other items to be defined by the BRSA (-)	7,922	
tems to be deducted from the sum of Tier I and Tier II Capital (Capital) during transition period	.,	
Portion of total Net Long Positions of the Investments in Equity Items of Unconsolidated Banks and Financial Institutions where the		
Bank Owns 10% or less of the Issued Share Capital, exceeding 10% of Bank's Tier I Capital, which is not deducted from Tier I,		
Tier II and additional capital as per Temporary Article 2 of the Regulation on the Equity of Banks	-	
Portion of total Net Long Positions of the Investments in Equity Items of Unconsolidated Banks and Financial Institutions where the		
Bank Owns 10% or less of the Issued Share Capital, exceeding 10% of Bank's Tier I Capital, which is not deducted from the tier		
Il capital and additional capital as per Temporary Article 2 of the Regulation on the Equity of Banks (-)	-	
Portion of the total of net long positions of investments made in the common equity items of banks and financial institutions outside		
the scope of consolidation where the bank owns 10% or more of the issued common share capital, deferred tax assets based on temporary differences and mortgage servicing rights not deducted from Common Equity as per paragraph 1 and 2 of Provisional		
	_	
Article 2 of the Regulation on the Equity of Banks (-)	-	
Article 2 of the Regulation on the Equity of Banks (-)	11.386.129	
Article 2 of the Regulation on the Equity of Banks (-) TOTAL CAPITAL Total Capital	11,386,129 53,932,535	
Article 2 of the Regulation on the Equity of Banks (-) TOTAL CAPITAL Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS		
Article 2 of the Regulation on the Equity of Banks (-) FOTAL CAPITAL Fotal Capital Fotal risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%)	53,932,535	
Article 2 of the Regulation on the Equity of Banks (-) TOTAL CAPITAL Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Lapital Adequacy Ratio (%)	53,932,535 12.94	
Article 2 of the Regulation on the Equity of Banks (-) OTAL CAPITAL Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS Dere Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Lapital Adequacy Ratio (%)	53,932,535 12.94 12.94	
Article 2 of the Regulation on the Equity of Banks (-) OTAL CAPITAL Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Suprecase Total buffer requirement	53,932,535 12.94 12.94 21.11	
Article 2 of the Regulation on the Equity of Banks (-) OTAL CAPITAL Total Capital Total risk weighted amounts APITAL ADEQUACY RATIOS Ore Capital Adequacy Ratio (%) Teir I Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Suppress Total Duffer requirement Capital protection buffer requirement (%)	53,932,535 12.94 12.94 21.11 1.912 1.875	
Article 2 of the Regulation on the Equity of Banks (-) OTAL CAPITAL Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Lapital Adequacy Ratio (%) BUFFERS Total buffer requirement Capital protection buffer requirement (%) Bank specific cyclical buffer requirement (%)	53,932,535 12.94 12.94 21.11	
Article 2 of the Regulation on the Equity of Banks (-) TOTAL CAPITAL Total Capital Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Supress Total buffer requirement Capital protection buffer requirement (%) Bank specific cyclical buffer requirement (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital	53,932,535 12.94 12.94 21.11 1.912 1.875 0.037	
Article 2 of the Regulation on the Equity of Banks (-) OTAL CAPITAL Total Capital Total Capital Total Capital Total Regulation and the Equity of Banks (-) CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Teir I Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Buffer Regulation Capital protection buffer requirement (%) Bank specific cyclical buffer requirement (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%)	53,932,535 12.94 12.94 21.11 1.912 1.875	
Article 2 of the Regulation on the Equity of Banks (-) OTAL CAPITAL Total Capital Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Teer I Capital Adequacy Ratio (%) Teer I Capital Adequacy Ratio (%) Teer I Capital Adequacy Ratio (%) Teer I Capital Protection buffer requirement (%) Bank specific cyclical buffer requirement (%) Bank specific cyclical buffer requirement (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Amounts below the Excess Limits as per the Deduction Principles	53,932,535 12.94 12.94 21.11 1.912 1.875 0.037	
Article 2 of the Regulation on the Equity of Banks (-) OTAL CAPITAL Total Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Total buffer requirement Capital protection buffer requirement (%) Bank specific cyclical buffer requirement (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Amounts below the Excess Limits as per the Deduction Principles Wincounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where	53,932,535 12.94 12.94 21.11 1.912 1.875 0.037	
Article 2 of the Regulation on the Equity of Banks (-) OTAL CAPITAL Total Capital Adequacy Ratio (%) Total Capital Adequacy Ratio (%) Total Capital Adequacy Ratio (%) Total Duffer requirement Capital Protection buffer requirement (%) Bank specific cyclical buffer requirement (%) Total Capital Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Amounts below the Excess Limits as per the Deduction Principles Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or less of the issued share capital	53,932,535 12.94 12.94 21.11 1.912 1.875 0.037	
Article 2 of the Regulation on the Equity of Banks (-) OTAL CAPITAL Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Terrif Capital Adequacy Ratio (%) Terrif Capital Adequacy Ratio (%) Terrif Capital Adequacy Ratio (%) Terrif Capital Adequacy Ratio (%) Terrif Capital Protection buffer requirement (%) Bank specific cyclical buffer requirement (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Amounts below the Excess Limits as per the Deduction Principles Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or less of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where	53,932,535 12.94 12.94 21.11 1.912 1.875 0.037	
Article 2 of the Regulation on the Equity of Banks (-) OTAL CAPITAL Total Capital Adequacy Ratio (%) Total Capital Adequacy Ratio (%) Total Capital Adequacy Ratio (%) Total Capital Adequacy Ratio (%) Total Capital Adequacy Ratio (%) Total Duffer requirement Capital protection buffer requirement (%) Bank specific cyclical buffer requirement (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Amounts below the Excess Limits as per the Deduction Principles Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or less of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or rore of the issued share capital	53,932,535 12.94 12.94 21.11 1.912 1.875 0.037	
Article 2 of the Regulation on the Equity of Banks (-) OTAL CAPITAL Total Capital Total Capital Total Capital Total Regulation and the Equity of Banks (-) CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Territorial Adequacy Ratio (%) Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Bank specific cyclical buffer requirement (%) Total buffer requirement Capital protection buffer requirement (%) Bank specific cyclical buffer requirement (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Amounts below the Excess Limits as per the Deduction Principles Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or less of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital Anounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital	12.94 12.94 21.11 1.912 1.875 0.037 6.937	
Article 2 of the Regulation on the Equity of Banks (-) OTAL CAPITAL Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Terrior I Capital Adequacy Ratio (%) Terrior I Capital Adequacy Ratio (%) Terrior I Capital Adequacy Ratio (%) Terrior I Capital Adequacy Ratio (%) Terrior I Capital Protection buffer requirement (%) Buffer Requirement Capital protection buffer requirement (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Amounts below the Excess Limits as per the Deduction Principles Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or less of the issued share capital winounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital Mortgage Servicing Rights Amount arising from deferred tax assets based on temporary differences	53,932,535 12.94 12.94 21.11 1.912 1.875 0.037	
Article 2 of the Regulation on the Equity of Banks (-) OTAL CAPITAL Total Capital Total Capital Total Capital Total Risk weighted amounts CAPITAL ADEQUACY RATIOS Total Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Total buffer requirement Capital protection buffer requirement (%) Bank specific cyclical buffer requirement (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Immounts below the Excess Limits as per the Deduction Principles Total buffer requirement in the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or less of the issued share capital unmounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital unmounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital unmounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital uncontained in the positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital uncontained in the positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital uncontained in the positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital uncontained in the positions of investments in equity items of unconsolidated	12.94 12.94 21.11 1.912 1.875 0.037 6.937	
Article 2 of the Regulation on the Equity of Banks (-) OTAL CAPITAL Total Capital Total Capital Total Capital Total Regulation and the Equity of Banks (-) CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Teier I Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Bank specific cyclical buffer requirement (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Amounts below the Excess Limits as per the Deduction Principles Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or less of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital Amounts arising from deferred tax assets based on temporary differences Limits related to provisions considered in Tier II calculation Deneral provisions for standard based receivables (before ten thousand twenty five limitation)	53,932,535 12.94 12.94 21.11 1.912 1.875 0.037 6.937 -	
Article 2 of the Regulation on the Equity of Banks (-) OTAL CAPITAL Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Tier I Capital Protection buffer requirement (%) Bank specific cyclical buffer requirement (%) Bank specific cyclical buffer requirement (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Amounts below the Excess Limits as per the Deduction Principles Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or less of the issued share capital whounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital whounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital whounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital whounts arising from deferred tax assets based on temporary differences Limits related to provisions considered in Tier II calculation Seneral provisions for standard based receivables (before ten thousand twenty five limitation) Up to 1.25% of total risk-weighted amount of general reserves for receivables where the standard approach used	53,932,535 12.94 12.94 21.11 1.912 1.875 0.037 6.937 - - 188,440 618,520	
Article 2 of the Regulation on the Equity of Banks (-) OTAL CAPITAL Total Capital Total risk weighted amounts APITAL ADEQUACY RATIOS One Capital Adequacy Ratio (%) Tail capital Adequacy Ratio (%) Tail capital Adequacy Ratio (%) Tail and Adequacy Ratio (%) Tail and Adequacy Ratio (%) Tail and Adequacy Ratio (%) Tail and Adequacy Ratio (%) Tail and Adequacy Ratio (%) Tail and Adequacy Ratio (%) Bank specific cyclical buffer requirement (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Amounts below the Excess Limits as per the Deduction Principles Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or less of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital Amounts arising from deferred tax assets based on temporary differences Amints related to provisions considered in Tier II calculation The provision for standard based receivables (before ten thousand twenty five limitation) The provision for standard based receivables (before ten thousand twenty five limitation) The provision for standard based receivables (before ten thousand twenty five limitation) The provision for standard based receivables (before ten thousand twenty five limitation) The Credit Risk Based Amount as per the Internal Ratings Based Approach	53,932,535 12.94 12.94 21.11 1.912 1.875 0.037 6.937 - - 188,440 618,520	
Article 2 of the Regulation on the Equity of Banks (-) OTAL CAPITAL Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Tier I Capital Adequacy Ratio (%) Tier I Capital Protection buffer requirement (%) Bank specific cyclical buffer requirement Capital protection buffer requirement (%) Bank specific cyclical buffer requirement (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Amounts below the Excess Limits as per the Deduction Principles Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or less of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or	53,932,535 12.94 12.94 21.11 1.912 1.875 0.037 6.937 - - 188,440 618,520	
Article 2 of the Regulation on the Equity of Banks (-) OTAL CAPITAL Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Ter I Capital Adequacy Ratio (%) Ter I Capital Adequacy Ratio (%) Ter I Capital Adequacy Ratio (%) Ter I Capital Adequacy Ratio (%) Ter I Capital protection buffer requirement (%) Bank specific cyclical buffer requirement (%) Bank specific cyclical buffer requirement (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Amounts below the Excess Limits as per the Deduction Principles Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or less of the issued share capital Auroquase Servicing Rights Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital Auroquase Servicing Rights Amounts arising from deferred tax assets based on temporary differences Limits related to provisions considered in Tier II calculation Teneral provisions for standard based receivables (before ten thousand twenty five limitation) Jup to 1.25% of total risk-weighted amount of general reserves for receivables where the standard approach used umount of total provision exceeding the total expected loss amount calculated according to the Communiqué on the Calculation of the Credit Risk Based Amount as per the Internal Ratings Based Approach	53,932,535 12.94 12.94 21.11 1.912 1.875 0.037 6.937 - - 188,440 618,520	
Article 2 of the Regulation on the Equity of Banks (-) OTAL CAPITAL Total Capital Total Capital Total Capital Total Risk weighted amounts APITAL ADEQUACY RATIOS One Capital Adequacy Ratio (%) Teier I Capital Adequacy Ratio (%) Teier I Capital Adequacy Ratio (%) Teier I Capital Adequacy Ratio (%) Teier I Capital Adequacy Ratio (%) Teier I Capital Adequacy Ratio (%) Bank specific cyclical buffer requirement (%) Total buffer requirement Capital protection buffer requirement (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Amounts below the Excess Limits as per the Deduction Principles Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or less of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital Amounts arising from deferred tax assets based on temporary differences Limits related to provisions considered in Tier II calculation Deneral provisions for standard based receivables (before ten thousand twenty five limitation) Jp to 1.25% of total risk-weighted amount of general reserves for receivables where the standard approach used Amount of total provision exceeding the total expected loss amount calculated according to the Communiqué on the Calculation of the Credit Risk Based Amount as per the Internal Ratings Based Approach Amount of total provision exceeding the total expected loss amount calculated according to the Communiqué on the Calculation of the Credit Risk Based Amount as per th	53,932,535 12.94 12.94 21.11 1.912 1.875 0.037 6.937 - - 188,440 618,520	
Article 2 off the Regulation on the Equity of Banks (-) TOTAL CAPITAL Total Capital Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS Core Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Buffer Requirement Capital protection buffer requirement (%) Bank specific cyclical buffer requirement (%) Bank specific cyclical buffer requirement (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Amounts below the Excess Limits as per the Deduction Principles Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital worth ages ervicing Rights Amount arising from deferred tax assets based on temporary differences Limits related to provisions considered in Tier II calculation General provisions for standard based receivables (before ten thousand twenty five limitation) Up to 1.25% of total risk-weighted amount of general reserves for receivables where the standard approach used Amount of total provision exceeding the total expected loss amount calculated according to the Communiqué on the Calculation of the Credit Risk Based Amount as per the Internal Ratings Based Approach Amount up to 0.6% of the portion of total provision exceeding the total expected loss amount calculated according to the Communiqué on the Calculation of the Credit Risk Based Amount as per the Internal Ratings Based Approach Debt instruments subject to Temporary Article 4 (to be implemented between 1 January 2018 and 1 January 2022) Upper limit for Additional T	53,932,535 12.94 12.94 21.11 1.912 1.875 0.037 6.937 - - 188,440 618,520	
Article 2 of the Regulation on the Equity of Banks (-) TOTAL CAPITAL Total Capital Total Capital Total risk weighted amounts CAPITAL ADEQUACY RATIOS One Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Capital Adequacy Ratio (%) Bank specific cyclical buffer requirement (%) The ratio of Additional Common Equity Tier I capital to be calculated as per the first paragraph of Article 4 of Regulation on Capital Protection and Countercyclical Capital buffers to Risk Weighted Assets (%) Amounts below the Excess Limits as per the Deduction Principles Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or less of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital Amounts arising from the net long positions of investments in equity items of unconsolidated banks and financial institutions where the bank owns 10% or more of the issued share capital Amounts arising from deferred tax assets based on temporary differences Limits related to provisions considered in Tier II calculation General provisions for standard based receivables (before ten thousand twenty five limitation) Jp to 1,25% of total risk-weighted amount of general reserves for receivables where the standard approach used Amount of total provision exceeding the total expected loss amount calculated according to the Cordit Risk Based Amount as per the Internal Ratings Based Approach Amount up to 0.6% of the portion of total provision exceeding the total expected loss amount calculated according to the Communiqué on the Calculation of the Credit R	53,932,535 12.94 12.94 21.11 1.912 1.875 0.037 6.937 - - 188,440 618,520	

^(*) Amounts represent the amounts of items to be taken into consideration and subject to transition provisions in accordance with Temporary Articles of "Regulation on the Equity of Banks".

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

I. Explanations on consolidated capital (continued)

Information about debt instruments that will be included in total capital calculation:

1	ING Bank N.V.	ING Bank N.V.	ING Bank N.V.
Unique identifier (e.g. CUSIP, ISIN, etc.)	ING BAIK N.V.	ING BAHK IN.V.	ING BAIR N.V.
Governing law(s) of the instrument	BRSA	BRSA	BRSA
Regulatory treatment	Supplementary capital	Supplementary capital	Supplementary capital
	Supplementary capital No	Supplementary capital No	Supplementary capital No
Subject to 10% deduction as of 1/1/2015 Eligible at stand-alone / consolidated	Stand alone -Consolidated	Stand alone -Consolidated	Stand alone -Consolidated
Instrument type (types to be specified by each jurisdiction)	Loan	Loan	Loan
instrument type (types to be specified by each jurisdiction)	USD 82 million (TL 471	USD 73 million (TL 420	USD 62 million (TL 357
Amount recognised in regulatory capital (Currency in million, as of most recent reporting date)	million) and EUR 72 million (TL 473 million)	million) and EUR 68 million (TL 446 million)	million) and EUR 231 million (TL 1,516 million)
Par value of instrument (Currency in million)	USD 102 million (TL 588 million) and EUR 90 million (TL 591million)	USD 91 million (TL 525 million) and EUR 85 million (TL 558 million)	USD 62 million (TL 357million) and EUR 231 million (TL 1,516 million)
Accounting classification	Subordinated Loans	Subordinated Loans	Subordinated Loans
Original date of issuance	11 March 2014	26 June 2014	26 May 2015
Perpetual or dated	Dated	Dated	Dated
Original maturity date	10 years	10 years	10 years
Issuer call subject to prior BRSA approval	Yes	Yes	Yes
Optional call date, contingent call dates and redemption amount	5th year	5th year	5th year
Subsequent call dates, if applicable	After 5th year	After 5th year	After 5th year
Coupons / dividends	-	-	-
Fixed or floating dividend/coupon	Floating	Floating	Floating
	Libor+2.78% and	Libor+2.27% and	Libor+2.19% and
Coupon rate and any related index	Euribor+2.29%	Euribor+2.17%	Euribor+1.68%
Existence of a dividend stopper	-	-	-
Fully discretionary, partially discretionary or mandatory	-	-	-
Existence	None	None	None
Noncumulative or cumulative	-	-	-
Convertible or non-convertible	None	None	None
If convertible, conversion trigger(s)	-	-	-
If convertible, fully or partially	-	-	-
If convertible, conversion rate	-	-	-
If convertible, mandatory or optional conversion	-	-	-
If convertible, specify instrument type convertible into	-	-	-
If convertible, specify issuer of instrument it converts into			
Write-down feature	None	None	None
If write-down, write-down trigger(s)	-	-	-
If write-down, full or partial	-	-	-
If write-down, permanent or temporary	-		
If temporary write-down, description of write-up mechanism	-	-	
Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	After the senior creditors primary subordinated loans and before the TIER I sub- debt, same with TIER II	After the senior creditors primary subordinated loans and before the TIER I sub- debt, same with TIER II	After the senior creditors primary subordinated loans and before the TIER I sub- debt, same with TIER II
Whether conditions in Articles 7 and 8 of the Regulation on the Equity of Banks are met	None	None	None
Conditions in Articles 7 and 8 of the Regulation on the Equity of Banks, which are not met	-	-	-

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

I. Explanations on consolidated capital (continued)

Explanations on reconciliation of capital items to balance sheet

Risk classifications	Carrying amount	Amounts in equity calculation
Charabaldara' aguity	0.247.250	0.247.250
Shareholders' equity	8,317,350	8,317,350
Gains from cash flow hedge transactions	315,358	(315,358)
Leasehold improvements on operational leases	35,587	(35,587)
Goodwill and intangible assets	47,335	(42,964)
General provision	578,427	562,984
Subordinated debt(*)	4,141,975	3,683,226
Other deductions from shareholders' equity	6,800	(6,800)
Capital		12,162,851

^(*) In accordance with the 9th Clause of the 8th Article of the "Regulation on Equity of Banks", subordinated loans of the parent bank amounting to USD 102 million and EUR 90 million and USD 91 million and EUR 85 million are amortised by 20% and then included in Tier II Capital as their remaining maturity is less than five years as of 30 June 2019.

II. Explanations on consolidated currency risk

Management of foreign currency risk is differentiated on the basis of "Banking Book" and "Trading Book", where trading book is managed in accordance with foreign currency trading position limits as well as value at risk ("VaR") and banking book is managed foreign exchange position limits scope. The results of measurements are shared periodically with senior management, Asset-Liability Committee, Audit Committee and the Board of Directors. Besides, currency risk is also taken into account in the capital adequacy ratio calculation as part of the market risk under the standard method.

The simple arithmetic average of USD and EUR buying rates of the Parent Bank for the thirty days before the balance sheet date are 5.8139 (Full TL) and 6.5618 (Full TL) respectively.

The Parent Bank's USD and EUR buying rates as of balance sheet date and five business days prior to this date are as follows:

	1 USD	1 EUR
The Parent Bank's "foreign exchange buying rates" (30 June 2019)	5.7660	6.5646
Previous days;		
28 June 2019	5.7660	6.5646
27 June 2019	5.7555	6.5394
26 June 2019	5.7582	6.5448
25 June 2019	5.7687	6.5723
24 June 2019	5.8082	6.6138

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

II. Explanation on consolidated currency risk (continued)

Information related to consolidated currency risk:

	EURO	USD	Other FC	Total
Current period				
Assets				
Cash (cash in vault, foreign currency cash, money in				
transit, checks purchased) and balances with the				
Central Bank of Turkey	6,060,517	2,281,602	1,226,930	9,569,049
Banks	739,812	1,293,971	147,953	2,181,736
Financial assets at fair value through profit or loss	39,565	44,863	-	84,428
Money market placements	-	-	_	
Financial assets measured at fair value through other				
comprehensive income	225	_	_	225
Loans	13.990.364	5,097,032	19,629	19.107.025
Investments in associates, subsidiaries and joint	10,000,004	0,007,002	10,020	10,107,020
ventures				_
Financial assets measured at amortised cost	-	-	-	_
Hedging derivative financial assets	- 5	-	-	- 5
0 0		-	-	
Tangible assets (net)	6	-	-	6
Intangible assets (net)	-		-	75.004
Other assets	51,083	24,775	23	75,881
Total assets	20,881,577	8,742,243	1,394,535	31,018,355
Liabilities				
Bank deposit	1,905,653	406,703	154	2,312,510
Foreign currency deposits	3,634,755	9,072,185	555,677	13,262,617
Funds from interbank money market	37,749	0,072,100	-	37,749
Borrowings	11,586,728	8,227,267	18,563	19,832,558
Marketable securities issued (net)	11,300,720	0,221,201	10,303	19,002,000
Miscellaneous payables	28.657	44,016	267	72,940
Hedging derivative financial liabilities	-,	44,010	201	9,151
Other liabilities	9,151	40 400	- 570	,
Other habilities	35,849	48,428	579	84,856
Total liabilities	17,238,542	17,798,599	575,240	35,612,381
Net on balance sheet position	3,643,035	(9,056,356)	819,295	(4,594,026)
Net off-balance sheet position	(3,623,689)	9,058,208	(813,921)	4,620,598
Financial derivative assets	6,692,734	16,205,173	700,596	23,598,503
Financial derivative liabilities	10,316,423	7,146,965	1,514,517	18,977,905
Non-cash loans	1,978,244	4,681,086	207,492	6,866,822
	,	•	•	
Prior period				
Total assets	19,288,721	7,286,112	1,280,144	27,854,977
Total liabilities	18,983,367	17,697,027	530,099	37,210,493
Net on-balance sheet position	305,354	(10,410,915)	750,045	(9,355,516)
Net off-balance sheet position	(244,335)	10,388,022	(748,022)	9,395,665
Financial derivative assets	7,987,608	19,364,401	1,196,112	28,548,121
Financial derivative liabilities	8,231,943	8,976,379	1,944,134	19,152,456
Non-cash loans	1,499,749	5,015,658	209,249	6,724,656

In the foreign currency risk table:

The principal and accrual amount of the foreign currency indexed loans amounting to TL 258,135 (31 December 2018: TL 458,100) is presented in the loans line. As of 31 December 2018, the Group has foreign currency indexed factoring receivables amounting to TL 2,784.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

II. Explanation on consolidated currency risk (continued)

The foreign currency amounts not included in currency risk table according to the regulation about foreign currency net general position/capital adequacy standard ratio are explained below with the order in the table above.

```
Held-for-trading derivative financial assets: TL 136,272 (31 December 2018: TL 301,893 ). Prepaid expenses: TL 6,496 (31 December 2018: TL 628). Held-for trading derivative financial liabilities: TL 119,772 (31 December 2018: TL 181,638). Hedge funds (Effective Portion): TL (9,306) (31 December 2018: TL (4,482)). Interest rate swap (buy) transactions and options (buy): TL 7,253,523 (31 December 2018: TL 4,680,290). Interest rate swap (sell) transactions and options (sell): TL 7,253,523 (31 December 2018: TL 4,680,290).
```

There are no foreign currency indexed factoring guarantees stated in non-cash loans (31 December 2018: TL 438).

There are no foreign currency indexed factoring guarantees stated in non-cash loans.

Financial derivative assets/ liabilities include the foreign currency buy/sell transactions indicated below.

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Forward foreign currency-buy transactions: TL 522,656 (31 December 2018: TL 454,812). Forward foreign currency-sell transactions: TL 654,504 (31 December 2018: TL 441,022).
```

III. Explanations on consolidated interest rate risk

Interest risk, which refers to the loss which interest sensitive assets and liabilities in and off balance sheet that might be subject to due to the changes in the interest rate as a result of maturity mismatch, is differentiated and managed on the basis of banking book and trading book as part of compliance with both Basel regulations and other international standards. Within this context, in addition to the value at risk limit for trading book, sensitivity limit against interest rate shocks has been determined under trading books and banking books. Capital requirement relating to market risk is calculated through the Standard Method according to Basel II.

In order to hedge interest rate risk, hedging strategies are applied through off-balance sheet transactions provided that the limits determined by the Board of Directors are not exceeded, and interest rate risk is managed by ensuring optimum balance between fixed and floating rate assets within the balance sheet.

The measurement and sensitivity analysis related to the interest rate risk on the balance sheet are performed regularly and the results are shared with the senior management, Asset and Liability Committee, the Audit Committee and the Board of Directors periodically. Internal calculations for the interest rate risk arising from banking books are made on a daily and monthly basis, whereas Interest rate risk standard ratio arising from banking books is reported on a monthly basis to BRSA.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

III. Explanations on consolidated interest rate risk (continued)

1. Information related to the interest rate sensitivity of assets, liabilities and off-balance sheet items (based on re-pricing dates)

Current period	Up to 1 month	1 3 months	3-12 months	1-5 years	5 years and over	Non-interest bearing	Total
Current period	monu	1-3 1110111115	3-12 1110111115	1-5 years	Over	Dearing	TOLAI
Assets							
Cash (cash in vault, foreign currency cash, money in transit, checks							
purchased) and balances with the Central Bank of Turkey	7,964,220	-	-	-	-	2,420,499	10,384,719
Banks	2,204,675	-	-	-	-	7	2,204,682
Financial assets at fair value through profit and loss	331,997	544,119	161,501	38,558	41,101	66	1,117,342
Money market placements	6,353,870	-	-	-	-	-	6,353,870
Financial assets measured at fair value through other							
comprehensive income	525,812	1,407,351	330,417	428,229	-	8,447	2,700,256
Loans (***)	11,745,937	3,726,954	12,895,606	11,693,842	785,563	840,221	41,688,123
Financial assets measured at amortised cost	-	-	1,195,767	-	-	-	1,195,767
Other assets (*)	-	-	-	-	-	1,621,763	1,621,763
Total assets	29,126,511	5,678,424	14,583,291	12,160,629	826,664	4,891,003	67,266,522
Liabilities							
Bank deposits	2.312.304					11,472	2,323,776
Other deposits	27.896.927	1,094,820	244,632	2.760	-	4,402,525	33.641.664
Money market borrowings	2,239	1,094,020	244,032	2,700	37,749	4,402,323	39,988
Miscellaneous payables	255,843	-	-	-	31,149	291,295	547,138
Securities issued	200,040	-	-	-	-	291,293	347,136
Funds obtained from other financial institutions	12,766,794	4.860.298	1.017.250	1,689,550	-		20,333,892
					-		
Other liabilities (**)	467,345	269,040	77,335	30,724	-	9,535,620	10,380,064
Total liabilities	43,701,452	6,224,158	1,339,217	1,723,034	37,749	14,240,912	67,266,522
Balance sheet long position	_	_	13,244,074	10,437,595	788,915	_	24.470.584
Balance sheet short position	(14,574,941)	(545.734)	10,244,014	10,-101,000	700,313	(9,349,909)	(24,470,584)
Off-balance sheet long position	1,025,860	6,258,703	-	_	_	(3,543,303)	7,284,563
Off-balance sheet short position	1,020,000	0,200,700	(1,408,137)	(3,195,211)	(531,331)	_	(5,134,679)
On-balance sheet short position	-	-	(1,400,137)	(3,183,211)	(331,331)	-	(3,134,079)
Total positions	(13,549,081)	5,712,969	11,835,937	7,242,384	257,584	(9,349,909)	2,149,884

^(*) Non-interest bearing column in other assets line consists of tangible assets, intangible assets, current tax asset, deferred tax asset, assets held for sale, interest-free part of finance lease receivables, interest-free part of factoring receivables, expected loss provisions for non-credit financial assets and other assets.

Prior year's information related to the interest rate sensitivity of assets, liabilities and off-balance sheet items (based on re-pricing dates)

	Up to 1	·		·	5 years and	Non-interest	
Prior period	month	1-3 months	3-12 months	1-5 years	over	bearing	Total
Assets							
Cash (cash in vault, foreign currency cash, money in transit, checks							
purchased) and balances with the Central Bank of Turkey	7.244.807	23,054	_	_	_	1,642,376	8.910.23
Due from other banks and financial institutions	540.755	12,383	_	_	_	596.041	1,149,17
Financial assets at fair value through profit and loss	141.628	189,714	247,324	16,424	_	48	595.13
Money market placements	4,358,089	2,000	247,524	10,727	_		4,360,08
Available-for-sale financial assets	30	263,210	8,849	367.708	_	8,286	648.08
Loans and receivables	7,710,048	4,801,283	10,924,225	21,243,744	2,078,629		47,219,63
Held-to-maturity investments		245.961	949,035	21,210,711	2,0.0,020	-	1,194,99
Other assets (*)	796,624	2,172,287	-	-	-	1,365,815	4,334,72
Total assets	20,791,981	7,709,892	12,129,433	21,627,876	2,078,629	4,074,271	68,412,082
Liabilities							
Bank deposits	_	_	_	_	_	2.291.934	2.291.93
Other deposits	24.503.773	1,597,129	434,870	170	_	3,449,561	29,985,50
Money market borrowings	2,188	-	-	-	20,428	-	22,61
Miscellaneous payables	-	-	_	_	-	578,237	578,23
Securities issued	-	-	-	-	-	-	, -
Funds obtained from other financial institutions	3.831.829	9.418.515	6.061.329	2.050.483	3,818,740	-	25,180,896
Other liabilities (**)	353,872	337,388	405,895	15,253	-	9,240,488	10,352,896
Total liabilities	28,691,662	11,353,032	6,902,094	2,065,906	3,839,168	15,560,220	68,412,082
			•				
Balance sheet long position	-	-	5,227,339	19,561,970	-	-	24,789,309
Balance sheet short position	(7,899,681)	(3,643,140)	-	-	(1,760,539)	(11,485,949)	(24,789,309
Off-balance sheet long position	4,426,576	10,107,379	-	-	-	-	14,533,95
Off-balance sheet short position	-	-	(4,805,614)	(7,375,467)	(530,121)	-	(12,711,202
Total position	(3,473,105)	6,464,239	421,725	12,186,503	(2,290,660)	(11,485,949)	1,822,753

^(*) Non-interest bearing column in other assets line consists of property and equipment, intangible assets, current tax asset, deferred tax asset, assets held for sale, interest-free part of finance lease receivables, interest-free part of factoring receivables, expected loss provisions for non-credit financial assets and other assets.

^(**) Non-interest bearing column in other liabilities line consists of other foreign liabilities, provisions, taxes payable and equity.

^(***) Non-performing loans are presented under "non-interest bearing" column.

^(**) Non-interest bearing column in other liabilities line consists of other foreign liabilities, provisions, taxes payable and equity.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

III. Explanations on consolidated interest rate risk (continued)

2. Current period average interest rates applied to monetary financial instruments by the Group

	EURO	USD	Yen	TL
Current period	(%)	(%)	(%)	(%)
Assets				
Cash (Cash in vault, foreign currency cash, money in transit, checks purchased)				
and balances with the Central Bank of Turkey	_	2.00	_	13.00
Banks	0.72	2.35	_	23.99
Financial assets at fair value through profit and loss	2.10	7.12	-	15.78
Money market placements	-	-	-	23.90
Financial assets measured at fair value through other comprehensive income	-	-	-	15.95
Loans	3.47	5.94	-	20.55
Financial assets measured at amortised cost	-	-	-	18.90
Liabilities				
Bank deposits	(0.37)	2.35	-	_
Other deposits	`0.37	1.92	-	18.32
Money market borrowings	-	-	-	15.00
Miscellaneous payables	-	-	-	-
Securities issued	-	-	-	-
Funds obtained from other financial institutions	0.71	3.63	-	15.26

Prior period average interest rates applied to monetary financial instruments by the Group

	EURO	USD	Yen	TL
Prior period	(%)	(%)	(%)	(%)
Assets				
Cash (Cash in vault, foreign currency cash, money in transit, checks purchased)				
and balances with the Central Bank of Turkey	-	2.00	-	13.00
Due from other banks and financial institutions	1.22	4.03	-	23.53
Financial assets at fair value through profit and loss	2.14	6.95	-	15.16
Money market placements	-	-	-	24.18
Financial assets available-for-sale	_	-	-	15.24
Loans and receivables	3.36	6.24	-	20.66
Held-to-maturity investments	-	-	-	19.82
Liabilities				
Bank deposits	(0.36)	2.39	-	-
Other deposits	0.48	2.71	-	18.72
Money market borrowings	-	-	-	15.00
Miscellaneous payables	-	-	-	-
Securities issued	-	_	-	_
Funds obtained from other financial institutions	0.69	3.83	-	13.91

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Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

IV. Explanations on equity securities position risk derived from consolidated banking books

1. Explanations on accounting policies for equity investments in subsidiaries and associates

Accounting policies for equity investments in subsidiaries and associates are disclosed in section III disclosure III.

2. Comparison of carrying value, fair value and market value of equity investments

Current period	Carrying value	Fair value (*)	Market value
Quoted	-	-	-
Equity investments	-	-	-
Not quoted	8,447	3,196	3,196
Equity investments	8,447	3,196	3,196
Financials subsidiaries	· -	· -	
Financials subsidiaries	-	_	-

Prior period	Carrying value	Fair value (*)	Market value
Quoted	-	-	-
Equity investments	_	-	-
Not quoted	8,286	3,052	3,052
Equity investments	8,286	3,052	3,052
Financials subsidiaries	· -	· -	-
Financials subsidiaries	-	-	-

^(*) Only equity investments having market value are presented under "Fair Value" column.

3. Information on realized gains or losses on revaluation of securities, revaluation surplus and unrealized gains or losses and their included amounts in core and additional capital

	Realized	Revaluation increases			Unrealiz	Unrealized gains/ losses		
	gains/losses during the	Including into the additional			Including into the	Including into the additional		
Current period	period	Total	capital	Total	core capital	capital		
Private equity investments	-	-	-	-	-	-		
Shares traded on a stock Exchange	-	-	-	-	-	-		
Other stocks	-	127	-	(254)	(254)	-		
Total	-	127	-	(254)	(254)	-		

	_	Revaluation increases			Unrealiz	Unrealized gains/ losses		
	Realized		Including into			Including into		
	gains/losses		the		Including	the		
	during the		supplementary		into the	supplementary		
Prior period	period	Total	capital	Total	core capital	capital		
Private equity investments	-	-	-	-	-	-		
Shares traded on a stock Exchange	-	-	-	-	-	-		
Other stocks	-	127	-	(254)	(254)	-		
Total	-	127	-	(254)	(254)	-		

4. Capital requirement as per equity shares

Carrying value	Total RWA	Minimum capital requirement (*)
-	-	-
-	-	-
8,447	8,447	676
	- -	

Prior period	Carrying value	Total RWA	Minimum capital requirement (*)
Private equity investments	-	-	-
Shares traded on a stock exchange	-	-	-
Other equity shares	8,286	8,286	663

^(*) The amount is calculated by using standard method within the scope of the "Regulation on Measurement and Evaluation of Capital Adequacy of Banks"

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

- V. Explanations on consolidated liquidity risk management and liquidity coverage ratio
 - 1. Information on matters related to consolidated liquidity risk
 - a. Information on liquidity risk management, such as risk capacity, responsibilities and the structure of liquidity risk management, the Parent Bank's internal liquidity risk reporting, communication between the Board of Directors and business lines on liquidity risk strategy, policy and application

A policy ("Market Risk Management Policy") which includes measures to be taken and practices that might be applied in normal and stressful economic conditions for liquidity risk management and responsibilities of the senior management. This policy has been approved by the Asset Liability Management Committee and by the Board of Directors. Within the scope of this policy, the liquidity risk is managed under the Asset Liability Management Committee which senior representatives of businesses are members of the Committee.

In accordance with the provisions of the policy, a liquidity buffer that can supply adequate liquidity level under any economic circumstances and which is not subject to the collateral, has been determined. In addition, the Contingency Funding Plan to be implemented in times of stress is currently in force. Besides, an Asset Liability Management Committee and Board of Directors approved liquidity risk appetite has been established in order to enable monitoring and managing the risk numerically. The relevant parameters are analysed regularly and reported to the members of Asset Liability Management Committee and Board of Directors.

Furthermore, the Parent Bank's liquidity buffers are evaluated under different stress scenarios with the comprehensive liquidity stress test approach established in accordance with ING Group's common policies on market risk and particularly new global regulations (Internal Liquidity Adequacy Assessment Process / ILAAP-Internal Liquidity Adequacy Assessment Process). In addition, still in scope of ILAAP, in the Risk Control Self- Assessment process, comprehensive assessments are made related to liquidity risk, and after these risks are identified clearly, their potential financial impact on the Parent Bank's operations is evaluated periodically.

To ensure proactive management of funding liquidity risk, risk thresholds specified on deposit movements and early warning signals are monitored. The Contingency Funding Plan monitoring metrics are not limited to this scope but also include other liquidity risk indicators. The Contingency Funding plan monitoring metrics can trigger decision-making conditions on whether the Bank will implement the Contingency Funding Plan in order to anticipate the potential development of liquidity stress incidents.

b. Information on the centralization degree of liquidity management and funding strategy and the functioning between the Parent Bank and the Parent Bank's subsidiaries

The liquidity risk of the Parent Bank is managed by the Asset and Liability Management. Furthermore, subsidiaries manage their own liquidity risk by themselves. In order to make a central funding strategy, a funding plan including subsidiaries is established every year. In addition, information about the implementation and realization of the funding plan is made to the Asset Liability Management Committee. According to the limits determined by the Board of Directors, liquidity deficit and surplus are tracked and actions are taken in accordance with the price, interest rate and term structure.

c. Information on the Parent Bank's funding strategy including the policies on funding types and variety of maturities

Resource diversification short, medium and long term targets are determined in parallel to business line planning as part of the budget process in the Parent Bank. Besides, the Parent Bank's funding capacity is monitored regularly, and shared with senior management monthly within the Asset and Liability Management Group- Asset Liability Management Committee reporting. In this way, factors which may affect the ability to create additional funding can be followed closely by senior management and the validity of the funding estimates generation capacity can be monitored.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

V. Explanations on consolidated liquidity risk management and liquidity coverage ratio (continued)

c. Information on liquidity management on the basis of currencies constituting a minimum of five percent of the Parent Bank's total liabilities

Almost all of the Parent Bank's liabilities are in TL, USD or EURO, and TL funds comprise of mainly equity, deposits and loans received. The Bank's liquidity in TL is managed with repurchase agreements and short-term money market transactions carried out at CBRT/BIST using high quality securities owned by the Bank. While the main purpose is using liabilities in TL in funding TL assets, when necessary FX swap transactions and FC funds are used in creating assets in TL within the limits set by the Board of Directors. Foreign currency funds are obtained through foreign exchange deposit accounts and foreign based foreign currency loans including syndications, Liquidity shortage/surplus values are calculated daily by Asset and Liability Management and these values are reported in Asset Liability Management Committee. Besides, the Total and FC liquidity coverage ratio is calculated on a daily basis, and shared with all units and senior management, and reported separately to Asset Liability Management Committee. The Bank has TL/FC borrowing limits ready to use in Central Bank and other banks.

d. Information on liquidity risk mitigation techniques

The first measure towards the mitigation of the liquidity risk as part of the budget process is planning the reduction of maturity mismatch and funding diversity. Within this context, syndication, other foreign funding, sources provided by the shareholders and other domestic funding opportunities are used. In addition to this, active swap markets are used to provide liquidity in a particular currency. In addition to all these, Contingency Funding Plan monitoring indicators are continuously monitored and reported on a monthly basis to Asset Liability Management Committee. With these indicators, intervals indicating the actions to be taken according to the triggering levels and measurement methods such as actual deposit inputs and outputs, stress test, liquidity buffer level, regulatory and structural liquidity ratios and so on are defined and these intervals support the decision making process. Moreover, in the crisis period, the Contingency Funding Plan has set some measures to bring the Bank's liquidity buffer back to reasonable levels. The important factors that will support the decision making mechanism, including the feasibility of these measures depending on the financial impact, implementation time and stress scenarios of the measures concerned, are explained.

e. Information on the use of stress tests

The Parent Bank has a written liquidity stress testing procedure which includes the implementation of stress testing and related responsibilities and is approved by Asset Liability Management Committee. To ensure that the existing positions remain within risk tolerance, the Market Risk Management and Product Control Group plans, designs, manages, reports to Asset Liability Management Committee and Board of Directors on a regularly basis and reviews the stress tests annually. Stress test scenarios which consider Bank specific, market-wide or both cases, and have short term or long term consequences, are used in stress testing application where the scenario and parameters are revised annually by the Asset and Liability Management and business lines. On the other hand, results of stress testing are used as the leading indicator within the process of activating the Contingency Funding Plan.

f. Overview on emergency and contingency liquidity situation plans

The Bank has established the Asset and Liability Management Committee and Board of Directors approved Contingency Funding Plan, which includes the policies, methods and responsibilities of senior management and business lines that can be applied in stressful situations or when liquidity shortages are experienced. Early warning indicators, which are the leading indicators of emergency funding plan and considered as the precursors of the liquidity shortage or an unexpected situation, are monitored monthly and are presented to the senior management on a monthly basis at Asset Liability Management Committee meetings and Board of Directors by Market Risk Management and Product Control Group. In addition, effective internal and external communication channels are determined and a crisis management team including realistic action plans are established in order to provide emergency liquidity crisis management and implement various elements of the plan. Measurement metrics of the emergency funding plan are revised annually with regards to their compliance with changes in market and stress conditions.

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Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

V. Explanations on consolidated liquidity risk management and liquidity coverage ratio (continued)

2. Liquidity coverage ratio

In accordance with BRSA's "Regulation on Banks' Liquidity Coverage Ratio Calculation", promulgated in the Official Gazette, No. 28948, dated 21 March 2014, the Parent Bank calculates and shares the Consolidated Liquidity Coverage Ratio to BRSA on a monthly basis Consolidated Liquidity Coverage Ratio is above the values stated in the regulation.

Dates and values of the lowest and highest FX and total liquidity coverage ratio calculated monthly over the last three months are presented in the below table.

	Minimum	Date	Maximum	Date
TL+FC	227.30%	30 June 2019	349.98%	30 April 2019
FC	173.98%	30 June 2019	337.43%	30 April 2019

Liquidity coverage ratio

	Total ι	ınweighted	То	tal weighted
		value (*)		value(*)
Current period	TL+FC	FC	TL+FC	FC_
High quality liquid assets				
High quality liquid assets			17,155,332	9,465,544
Cash Outflows				
Real person and retail deposits	29,733,738	10,459,061	2,541,086	1,045,906
Stable deposits	8,645,747	-	432,287	-
Less stable deposits	21,087,991	10,459,061	2,108,799	1,045,906
Unsecured funding other than real person and retail				
deposits	9,276,472	6,997,771	7,102,452	5,567,116
Operational deposits	148,093	7,134	37,023	1,783
Non-operational deposits	6,498,976	5,366,674	4,524,924	3,961,532
Other unsecured debt	2,629,403	1,623,963	2,540,505	1,603,801
Secured funding			-	-
Other cash outflows	18,126,174	9,451,007	7,695,237	4,235,555
Derivative exposures and collateral completion				
liabilities	6,198,733	3,210,093	6,198,733	3,210,093
Payables due to structured financial instruments	-	-	-	-
Payment commitments and other off-balance sheet				
commitments granted for debts to financial				
markets	11,927,441	6,240,914	1,496,504	1,025,462
Other contractual funding obligations	-	-	-	-
Other irrevocable or conditionally revocable off				
balance sheet liabilities	-	-	-	-
Total cash outflows			17,338,775	10,848,577
Cash inflows				
Secured lending	5,175,786	_	-	-
Unsecured lending	6,962,833	4,153,093	5,282,588	3,691,694
Other cash inflows	5,762,840	2,899,599	5,470,653	2,889,683
Total cash inflows	17,901,459	7,052,692	10,753,241	6,581,377
			To	tal adjusted
				value
Total high quality liquid assets stock			17,155,332	9,465,544
Total net cash outflows			6,590,858	4,312,065
Liquidity coverage ratio (%)			273.64	241.53

^(*) Simple arithmetic average calculated for the last three months by using the amounts calculated based on monthly simple arithmetic averages.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

V. Explanations on consolidated liquidity risk management and liquidity coverage ratio (continued)

	Total	unweighted value (*)	Total weighted value (*)		
Prior period	TL+FC	FC	TL+FC	FC	
High quality liquid assets			12 004 694	0.462.222	
High quality liquid assets			12,904,684	9,163,222	
Cash Outflows					
Real person and retail deposits	26,669,014	8,112,037	2,250,603	811,204	
Stable deposits	8,325,974	-	416,299	-	
Less stable deposits	18,343,040	8,112,037	1,834,304	811,204	
Unsecured funding other than real person and retail					
deposits	5,409,212	2,966,755	3,199,013	1,653,489	
Operational deposits	170,480	6,441	42,620	1,610	
Non-operational deposits	3,581,057	2,256,876	1,564,309	948,876	
Other unsecured debt	1,657,675	703,438	1,592,084	703,003	
Secured funding			-	-	
Other cash outflows	26,024,760	14,275,903	14,343,428	8,267,821	
Derivative exposures and collateral completion					
liabilities	12,582,760	6,997,432	12,582,759	6,997,432	
Payables due to structured financial instruments	-	-	-	-	
Payment commitments and other off-balance sheet					
commitments granted for debts to financial					
markets	13,442,000	7,278,471	1,760,669	1,270,389	
Other contractual funding obligations	-	-	-	-	
Other irrevocable or conditionally revocable off					
balance sheet liabilities	_	_	_	-	
Total cash outflows			19,793,044	10,732,514	
Cash inflows					
Secured lending	1,234,061	<u>-</u>	<u>-</u>	<u>-</u>	
Unsecured lending	8,226,156	3,185,546	5,616,708	2,711,993	
Other cash inflows	9,625,600	5,590,894	9,356,784	5,579,380	
Total cash inflows	19,085,817	8,776,440	14,973,492	8,291,373	
			Тс	tal adjusted	
Total high quality liquid agests stock			12.004.604	value	
Total high quality liquid assets stock Total net cash outflows			12,904,684 5,244,047	9,163,222 3,034,373	
Liquidity coverage ratio (%)			247.41	307.45	
Liquidity coverage ratio (%)			441.4 1	JU1.45	

^(*) Simple arithmetic average calculated for the last three months by using the amounts calculated based on monthly simple arithmetic averages.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

V. Explanations on consolidated liquidity risk management and liquidity coverage ratio (continued)

3. Other explanations on consolidated liquidity coverage ratio

Short term liquidity is managed within the regulatory limits in the Group, the liquid assets are managed by using "Liquidity Coverage Ratio" calculations to follow up the minimum liquidity limits and keep sufficient stock of high quality liquid assets to meet net cash outflows. Liquidity coverage ratio is calculated as per the Regulation on Banks' Liquidity Coverage Ratio Calculation. The ratio is affected from Bank's quality liquid asset value not used as guarantee that can be converted to cash any time and Bank's possible cash inflows and outflows arising from net cash assets, liability and off balance sheet transactions.

The Group evaluates cash equivalents, time and demand deposit accounts held in Central Bank of Turkey, obligatory reserves and debt securities issued by the Treasury and not subject to collaterals as high level quality liquid assets.

The primary sources to meet the liquidity needs of the Group are funds from interbank money market or financial assets at fair value through other comprehensive income security portfolio by repurchasing agreements or direct sales. Besides borrowing from the Group in medium and long term, in order to manage concentration risk with respect to funding resources, the Bank aims to balance maturity mismatch and protect from liquidity risk by taking actions aiming to increase resources diversification. A strategy targeting small amount deposits is applied as another element of the strategy to protect against concentration risk.

In addition, although the Parent Bank's wide range deposit structure including Orange Account and a large number of individually small saving deposits, it represents a short term funding source as comparable to the sector. However, these deposits renew themselves at the maturity date and remain in the Parent Bank's structure for a longer period than their original maturity.

Details of the Group's foreign currency balance sheet as of 30 June 2019 are summarized as follows:

Foreign currency borrowings constitute the majority of the foreign currency liabilities. 56% of the Group's total foreign currency liabilities consist of funds obtained from other financial institutions and subordinated loans and 44% is composed of deposits. Loans comprise 61% and cash and cash equivalents comprise 38% of the foreign currency assets. The bank placements have the shortest maturity within the assets denominated in foreign currency.

Details of the Group's Turkish Lira balance sheet as of 30 June 2019 are summarized as follows:

The majority of Turkish Lira balance sheet's liability consists of deposits. 65% of the Group's total Turkish Lira liabilities consists of deposits. However, in case of necessity, the Group has borrowing opportunities from both domestic and foreign banks and Takasbank and BIST repo market. 63% of the assets in Turkish Lira balance sheet are loans granted, 20% are cash and cash equivalents and 5% are marketable securities.

The cash flows from derivative financial instruments are included in LCR calculations according to the terms of Regulation. The Parent Bank also considers changes in fair value of the liabilities that result in margin calls when calculating cash outflows.

The liquidity needs and surpluses of consolidated subsidiaries of the Parent Bank are regularly monitored and managed. There are no operational or legal constraints preventing liquidity transfer. In the analyses made, it is seen that the effect of subsidiaries on the liquidity structure of the Parent Bank is limited compared to the size of the balance sheet.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

V. Explanations on consolidated liquidity risk management and liquidity coverage ratio (continued)

4. Breakdown of assets and liabilities according to their outstanding maturities

Current period	Demand	Up to 1 month	1-3 months	3-12 months	1-5 vears	5 years and over	Unallocated	Total
					,			
Assets								
Cash (cash in vault, foreign currency cash,								
money in transit, checks purchased) and	4 000 700	5 000 000						40 004 740
balances with the Central Bank of Turkey Banks	4,690,739 623,747	5,693,980 1.580.935	-	-	-	-	-	10,384,719 2,204,682
Financial assets at fair value through profit	023,747	1,300,933	-	-	-	-	-	2,204,002
or loss	-	65,578	43,307	367,437	599,853	41,101	66	1,117,342
Money market placements	-	6,353,870	· -	· -	· -	· -	-	6,353,870
Financial assets measured at fair value								
through other comprehensive income	-	208,664	174,348	683,514	1,607,259	18,024	8,447	2,700,256
Loans (***)	86,032	5,111,202	2,957,621	14,582,225	17,129,094	1,067,760	754,189	41,688,123
Financial assets measured at amortised cost	-	-	-	288,719	907,048	-	-	1,195,767
Other assets (*)	-	-	-	-	-	-	1,621,763	1,621,763
Total assets	5,400,518	19,014,229	3,175,276	15,921,895	20,243,254	1,126,885	2,384,465	67,266,522
Liabilities	0 000 770							0 000 770
Bank deposits Other deposits	2,323,776 4,532,116	27,767,336	1,094,820	244,632	2,760	-	-	2,323,776 33,641,664
Borrowings	4,552,110	3,208,589	1,085,972	3.681.565	10,201,657	2,156,109		20,333,892
Funds from interbank money market	_	2,239	-	-	-	37,749	_	39,988
Securities issued	-	_,	-	-	-	-	-	-
Miscellaneous payables	255,843	-	-	-	-	-	291,295	547,138
Other liabilities (**)	-	492,348	76,873	72,130	280,734	51,975	9,406,004	10,380,064
Total liabilities	7,111,735	31,470,512	2,257,665	3,998,327	10,485,151	2,245,833	9,697,299	67,266,522
Liquidity deficit/surplus	(1,711,217)	(12,456,283)	917,611	11,923,568	9,758,103	(1,118,948)	(7,312,834)	_
<u> </u>		•	•			• • • • •		
Net Off Balance Sheet Position	-	105,189	134,984	408,400	1,499,377	-	-	2,147,950
Derivative financial assets	-	10,241,631	7,916,065	14,512,801	10,645,725	531,694	-	43,847,916
Derivative financial liabilities Non-cash loans	348.938	10,136,442 487,189	7,781,081 953,117	14,104,401 5,365,539	9,146,348 875,708	531,694 873,687	-	41,699,966 8,904,178
NOII-Casii Ioalis	340,930	407,109	955,117	5,365,539	675,706	013,001	-	0,904,170
Prior period								
Total assets	2.246.751	20.140.198	5.506.444	13.606.587	23.701.986	1.382.596	1.827.520	68.412.082
Total liabilities	6,949,197	25,044,470	3,620,877	6,920,301	12,127,993	5,138,221	8,611,023	68,412,082
Lieudide, deficitions	(4.700.446)	(4.004.272)	4 005 507	C COC 20C	44 572 002	(2 7FF C2F)	(6.702.502)	
Liquidity deficit/surplus	(4,702,446)	(4,904,272)	1,885,567	6,686,286	11,573,993	(3,755,625)	(6,783,503)	-
Net Off Balance Sheet Position	_	(129,729)	61,454	428,261	1,479,268	_	_	1,839,254
Derivative financial assets	-	10,246,576	14,094,606	12,174,323	12,130,335	530,159	-	49,175,999
Derivative financial liabilities	-	10,376,305	14,033,152	11,746,062	10,651,067	530,159	-	47,336,745
Non-cash loans	298,637	917,786	1,462,947	4,263,430	1,115,833	828,836	-	8,887,469

^(*) Unallocated column in other assets mainly consists of other assets that are necessary for banking activities and that cannot be liquidated in the short term as tangible assets, stationery, prepaid expenses, expected loss provisions for non-credit financial assets and equity securities.

^(**) Unallocated column in other liabilities mainly consists of provisions, unallocated part of taxes payable and shareholders' equity.

^(***) Non-performing loans are presented under "unallocated" column.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

VI. Explanations on consolidated leverage ratio

Leverage ratio table prepared in accordance with the communique "Regulation on Measurement and Assessment of Leverage Ratios of Banks" published in the Official Gazette No.28812 dated 5 November 2013 is presented below. As of 30 June 2019, the Group's consolidated leverage ratio calculated by taking average of end of month leverage ratios for the last three-month is 8.90% (31 December 2018: 7.93%). This ratio is above the minimum ratio. The capital increased by 12% mainly as a result of increase in net profits. Therefore, the current period leverage ratio increased by 97 basis points compared to prior period.

	Current period (**)	Prior period (**)
Total assets in the consolidated financial statements prepared in		
accordance with TAS (*)	114,552,941	118,161,673
The difference between total amount of asset in the consolidated financial statements prepared in accordance with TAS and the communiqué on	, ,	, ,
preparation of consolidated financial statements of banks	35,272	(96,031)
The difference between total amount and total risk amount of derivative		
financial instruments with credit derivative in the communiqué on		
preparation of consolidated financial statements of banks	(27,529,695)	(30,616,499)
The difference between total amount and total risk amount of risk		
investment securities or commodity collateral financing transactions in the		
communiqué on preparation of consolidated financial statements of banks	253,433	145,863
The difference between total amount and total risk amount of off-balance		
sheet transactions in the communiqué on preparation of consolidated		
financial statements of banks	-	-
The other differences between amount of assets and risk in the		
communiqué on preparation of consolidated financial statements of banks	(83,685)	(56,792)
Total exposures	87,228,266	87,538,214

^(*) Consolidated financial statements are prepared based on Article No 5 of Clause No 6 in the Communiqué on Preparation of Consolidated Financial Statements of Banks.

Explanations on leverage ratio

	Current period (*)	Prior period (*)
On-balance sheet items		
On-balance sheet exposures (excluding derivatives and credit derivatives including		
collateral)	66,361,862	67,107,641
Asset deducted from core capital	(83,685)	(56,792)
The total amount of risk on-balance sheet exposures	66,278,177	67,050,849
Derivative financial instruments and credit derivative exposures		
Replacement cost associated with derivative financial instruments and credit		
derivatives	3,472,947	4,396,164
The potential credit risk amount of derivative financial instruments and credit		
derivatives	<i>514,44</i> 8	606,490
The total risk amount of derivative financial instruments and credit derivatives	3,987,395	5,002,654
Securities or commodity guaranteed financing transactions		
Risk amount of securities or commodity collateral financing transactions (excluding		
on balance sheet items)	253,433	145,863
Risk amount of exchange brokerage operations	-	-
The total risk amount of securities or commodity collateral financing transactions	253,433	145,863
Off-balance sheet items		
Gross notional amount for off-balance sheet items	16,709,261	15,338,848
Adjustments for conversion to credit equivalent amounts	-	-,,-
The total amount of risk for off-balance sheet items	16,709,261	15,338,848
Capital and total exposures		
Core capital	7,749,614	6,932,004
Total exposures	87,228,266	87,538,214
Leverage ratio		
Leverage ratio	8.90	7.93

^(*) The amounts in the table represents the average of last three months.

^(**) The amounts in the table represents the average of last three months.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

VII. Explanations on consolidated risk management

Notes and explanations in this section have been prepared in accordance with the Communiqué on Disclosures about Risk Management to be announced to Public by Banks, promulgated in the Official Gazette, No. 29511, dated 23 October 2015 and became effective as of 31 March 2016. Due to usage of standard approach for credit risk in the calculation of capital adequacy by the Parent Bank, tables required by Internal Rating Based approach ("IRB") are not presented.

1. General explanations on Parent Bank's risk management and risk weighted assets

		Risk weighted amount	Minimum capital requirement
	Current period	Previous period	Current period
Credit risk (excluding counterparty credit			
risk) (CCR)	42,917,901	45,836,154	3,433,432
Standardized approach (SA)	42,917,901	45,836,154	3,433,432
Internal rating-based (IRB) approach	-	-	-
Counterparty credit risk	2,120,821	2,920,260	169,666
Standardized approach for counterparty credit	, -,-	,,	,
risk (SA-CCR)	2,120,821	2,920,260	169,666
Internal model method	, -,- -	-	-
Basic risk weight approach to internal models			
equity position in the banking account	_	_	_
Investments made in collective investment			
companies – look-through approach	_	-	-
Investments made in collective investment			
companies – mandate-based approach	_	-	-
Investments made in collective investment			
companies - 1250% weighted risk approach	_	_	-
Settlement Risk	_	-	-
Securitization positions in banking accounts	-	-	-
IRB ratings-based approach (RBA)	_	_	_
IRB Supervisory Formula Approach (SFA)	-	_	-
SA/simplified supervisory formula approach	_	_	_
Market risk	292,863	383,425	23,429
Standardized approach (SA)	292,863	383,425	23,429
Internal model approaches (IMM)	, <u>-</u>	-	-
Operational risk	6,022,400	4,792,696	481,792
Basic indicator approach	6,022,400	4,792,696	481,792
Standard approach	, , , <u>-</u>	, , , <u>-</u>	, -
Advanced measurement approach	-	-	-
The amount of the discount threshold			
under the equity (subject to a 250% risk			
weight)	-	-	-
Floor adjustment	-	-	-
Total	51,353,985	53,932,535	4,108,319

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

VII. **Explanations on consolidated risk management (continued)**

2. Credit risk explanations

Credit quality of assets a.

		s carrying value of (according to TAS)		
Current period	Defaulted	Non-defaulted	Provisions/ amortisation and impairment	Net values
Loans (*)	2,595,069	40,933,934	1,840,727	41,688,276
Debt securities	-	1,914,500	4,608	1,909,892
Off-balance sheet exposures	117,678	14,071,726	67,745	14,121,659
Total	2,712,747	56,920,160	1,913,080	57,719,827

Factoring and leasing receivables are included in "loans account". (*) (**)

b. Changes in stock of defaulted loans and debt securities

	Current period
Defaulted loans and debt securities at end of the previous reporting period	2,088,790
Loans and debt securities that have defaulted since the last reporting period	793,504
Returned to non-defaulted status	-
Amounts written off	(5,042)
Other changes (**)	(282,183)
Defaulted loans and debt securities at end of the reporting period (*)	2,595,069

^(*) "Other changes" account consists of collections during the period.

C. Credit risk mitigation techniques

	Exposures unsecured: carrying amount as per TAS	Exposures secured by collateral	Exposures secured by collateral, of which: secured amount	Exposures secured by financial guarantees	Exposures secured by financial guarantees, of which: secured amount	Exposures secured by credit derivatives	Exposures secured by credit derivatives, of which: secured amount
Loans (*) Debt securities (*)	32,311,237 1,909,892	9,377,039	7,862,648	5,208,057	4,589,824	-	-
Total Of which defaulted	34,221,129 2,595,069	9,377,039 -	7,862,648	5,208,057 -	4,589,824 -	- -	- -

^(*) In accordance with the legislation, the general loan loss provision has been deducted from the relevant balance sheet amounts.

The provision of the financial securities measured at fair value under other comprehensive income have been added.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

VII. Explanations on consolidated risk management (continued)

ç. Credit risk exposure and credit risk mitigation effects

	Exposures before CCF		Exposu	res post-CCF		
	and CRM		and CRM		RWA and RWA density	
	On-balance	Off-balance	On-balance	Off-balance		-
	sheet	sheet	sheet	sheet		
Asset classes	amount	amount	amount	amount	RWA	RWA Density
Claims on sovereigns and Central Banks	9,881,809	-	14,471,632	-	3,497,973	24.17%
Claims on regional governments or local authorities	822,738	-	737,993	-	433,025	58.68%
Claims on administrative bodies and other non-commercial						
undertakings	-	-	-	-	-	-
Claims on multilateral development banks	-	-	-	-	-	-
Claims on international organizations	-	-	-	-	-	-
Claims on banks and intermediary institutions	12,972,169	3,497,991	6,672,107	1,127,483	2,556,430	32.78%
Claims on corporates	20,997,817	6,685,019	19,072,244	3,605,296	22,255,923	98.14%
Claims on retails	15,032,703	4,239,858	12,146,043	800,959	9,694,217	74.88%
Claims secured by residential property	1,253,419	39,348	1,253,419	13,413	445,847	35.19%
Claims secured by commercial property	1,743,631	160,051	1,743,631	85,257	1,020,674	55.81%
Past due loans	241,353	-	241,354	-	245,845	101.86%
Higher risk categories decided by the Board	1,034,939	-	1,034,938	-	1,204,665	116.40%
Secured by mortgages	-	-	-	-	-	-
Short-term claims and short-term corporate claims on banks and intermediary institutions	_	_	_			_
Undertakings for collective investments in mutual funds	_	_	_	_	_	_
Other receivables	3,970,472	24,454	3,970,475	4,891	1,554,855	39.11%
Stock investments	8,447	24,404	8,447	4,001	8,447	100.00%
Total (*)	67,959,497	14,646,721	61,352,283	5,637,299	42,917,901	64.07%

d. Standardised approach – Exposures by asset classes and risk weights

Risk classes	0%	10%	20%	35%	50%	75%	100%	150%	200%	Others	Total credit exposures amount (post CCF and post- CRM)
Claims on sovereigns and Central	070	1070	2070	0070	0070	1070	10070	10070	20070	Others	Ortini
Banks	10,973,659	_	_	_	_	_	3,497,973	_	_	_	14,471,632
Claims on regional governments or	,,						-, ,				,,
local authorities	_	-	_	-	609,937	-	128,056	_	-	_	737,993
Claims on administrative bodies											
and other non-commercial											
undertakings	-	-	-	-	-	-	-	_	-	-	-
Claims on multilateral development											
banks .	-	-	-	-	-	-	-	-	-	-	-
Claims on international											
organizations	-	-	-	-	-	-	-	-	-	-	-
Claims on banks and intermediary											
institutions	-	-	2,835,996	-	2,988,956	-	1,944,757	29,881	-	-	7,799,590
Claims on corporates	-	-	6,918	-	4	-	22,670,618	-	-	-	22,677,540
Claims on retails	-	-	-	-	-	12,947,002	-	-	-	-	12,947,002
Claims secured by residential											
property	-	-	-	1,263,054	-	-	3,778	-	-	-	1,266,832
Claims secured by commercial											
property	-	-	-	-	1,616,428	-	212,460	-	-	-	1,828,888
Past due loans	-	-	-	-	13,250	-	205,868	22,236	-	-	241,354
Higher risk categories decided by											
the Board	-	-	-	-	171,507	-	352,470	510,961	-	-	1,034,938
Secured by mortgages	-	-	-	-	-	-	-	-	-	-	-
Short-term claims and short-term											
corporate claims on banks and											
intermediary institutions	-	-	-	-	-	-	-	-	-	-	-
Undertakings for collective											
investments in mutual funds		-	-	-	-	-	-	-	-	-	-
Other receivables	2,420,506	-	-	-	-	-	1,554,860	-	-	-	3,975,366
Stock investments		-	· - · - · ·				8,447		-	-	8,447
Total	13,394,165	-	2,842,914	1,263,054	5,400,082	12,947,002	30,579,287	563,078	-	-	66,989,582

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

VII. Explanations on consolidated risk management (continued)

3. Counterparty credit risk (CCR) approach analysis

	Replacement cost	Potential future exposure	EEPE (*)	Alpha used for computing regulatory EAD	EAD post-CRM	RWA
Standardised Approach - CCR (for derivatives) Internal Model Method (for derivative financial instruments, repo transactions, securities or commodity lending or borrowing transactions, long settlement transactions and securities	3,024,280	488,407	-	1.40	3,512,687	1,874,657
financing transactions) Simple Approach for credit risk mitigation (for repo transactions, securities or commodity lending or borrowing transactions, long settlement transactions and securities financing transactions)	-	-	-	-	-	-
Comprehensive Approach for credit risk mitigation (for repo transactions, securities or commodity lending or borrowing transactions, long settlement transactions and securities financing transactions)	-	-	-	-	261,321	52,283
Value-at-Risk (VaR) for repo transactions, securities or commodity lending or borrowing transactions, long settlement transactions and securities financing transactions Total	-	-	-	-	-	- 1,926,940

^(*) Effective expected positive risk amount

4. Credit valuation adjustment (CVA) capital charge

	Exposure at default post-CRM	RWA
Tabel and the control of the Advance of OVA control of any		
Total portfolios subject to the Advanced CVA capital charge	-	-
(i) VaR component (including the 3×multiplier)	-	-
(ii) Stressed VaR component (including the 3×multiplier)	-	-
All portfolios subject to the Standardised CVA capital charge	3,512,687	193,881
Total subject to the CVA capital charge	3,512,687	193,881

5. Analysis of counterparty credit risk (CCR) exposure by approach

Asset classes/Risk weight	0%	10%	20%	50%	75%	100%	150%	Others	Total credit exposure (*)
Claims on sovereigns and Central Banks	-	-	-	_	-	-	-	-	-
Claims on regional governments or local authorities	-	-	-	-	-	-	-	-	-
Claims on administrative bodies and other non-commercial									
undertakings	-	-	-	-	-	-	-	-	-
Claims on multilateral development banks	-	-	-	-	-	-	-	-	-
Claims on international organizations	-	-	-	-	-	-	-	-	-
Claims on banks and intermediary institutions	-	-	585,987	2,745,871	-	4,693	-	-	3,336,551
Claims on corporates	-	-	-	-	-	416,081	-	-	416,081
Claims included in the regulatory retail portfolios	-	-	-	-	21,376	-	-	-	21,376
Claims secured by residential property	-	-	-	-	-	-	-	-	-
Past due loans	-	-	-	-	-	-	-	-	-
Higher risk categories decided by the Board	-	-	-	-	-	-	-	-	-
Secured by mortgages	-	-	-	-	-	-	-	-	-
Securitization positions	-	-	-	-	-	-	-	-	-
Short-term claims and short-term corporate claims on banks									
and intermediary institutions	-	-	-	-	-	-	-	-	-
Undertakings for collective investments in mutual funds	-	-	-	-	-	-	-	-	-
Stock investment	-	-	-	-	-	-	-	-	-
Other receivables	-	-	-	-	-	-	-	-	-
Other assets (**)	-	-	-	-	-	-	-	-	-
Total	-	-	585,987	2,745,871	21,376	420,774	-	-	3,774,008

^(*) Total credit exposure: After applying counterparty credit risk measurement techniques that are related to the amount of capital adequacy calculation.

6. Collaterals for counterparty credit risk (CCR)

Related table is not presented due to not having derivative collaterals which is considered in the calculation of capital adequacy ratio.

7. Credit derivatives

There is no credit derivative transaction.

^(**) Other assets: Includes counterparty credit risk that does not reported in "central counterparty" table.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

VII. Explanations on consolidated risk management (continued)

8. Exposures to central counterparties (CCP)

There are no exposures to central counterparties.

9. Explanations on securitisation

There is no secuitisation transaction.

10. Explanations on market risk

	RWA
Outright products	292,863
Interest rate risk (general and specific)	192,388
Equity risk (general and specific)	-
Foreign exchange risk	100,475
Commodity risk	-
Options	-
Simplified approach	-
Delta-plus method	-
Scenario approach	-
Securitisation	-
Total	292,863

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

VIII. Explanations on segment reporting

The Group operates mainly in corporate, SME, commercial and retail banking services. In scope of corporate, SME and commercial banking operations, customers are provided with special banking services including cash management service. In retail banking operations, customers are provided with debit and credit card, retail loan, online banking and private banking services. Spot TL, foreign exchange buy/sell transactions, derivative transactions, and treasury bill/government bond buy/sell transactions are performed at treasury operations.

Information on operating segments is prepared in accordance with the data provided by the Parent Bank's Management Reporting System.

	Corporate, SME and Commercial			
Current period – 30 June 2019	Banking	Retail Banking	Other	Total
Net interest income	764,967	704,047	222,041	1,691,055
Net commissions and fees income and other				
operating income	318,779	201,733	52,693	573,205
Trading gain/loss	67,078	26,751	353,433	447,262
Dividend income	_	-	175	175
Provision for impairment of loans and other				
receivables	(511,089)	(46,991)	(22,526)	(580,606)
Segment results	639,735	885,540	605,816	2,131,091
Other operating expenses (**)	•	,	•	(949,436)
Income from continuing operations before tax				1,181,655
Tax provision (*)				(251,416)
Net profit				930,239

	Corporate, SME and Commercial			
Prior period – 30 June 2018	Banking	Retail Banking	Other	Total
Net interest income	593,666	452,002	638,796	1,684,464
Net commissions and fees income and other				
operating income	395,602	294,490	119,250	809,342
Trading gain/loss	164,936	18,940	(406,504)	(222,628)
Dividend income	-	-	2	· 2
Provision for impairment of loans and other				
receivables	(300,554)	(341,040)	(259)	(641,853)
Segment results	853,650	424,392	351,285	1,629,327
Other operating expenses (*)	•		·	(861,256)
Income from continuing operations before tax				768,071
Tax provision (*)				(173,112)

Net profit 594,959

(**) Includes "Personnel Expenses" and "Other Provision Expenses" that presented in the statement of profit or loss as a different items.

Comment meried 20 lone 2010	Corporate, SME	Detail Dealine	Other	Tatal
Current period – 30 June 2019	and Commercial Banking	Retail Banking	Other	Total
Asset	33,363,371	11,064,787	22,838,364	67,266,522
Liability	19,106,669	26,707,453	13,135,050	58,949,172
Equity	-	-	8,317,350	8,317,350

	Corporate, SME			
Prior period – 31 December 2018	and Commercial Banking	Retail Banking	Other	Total
Asset	37,967,387	11,908,013	18,536,682	68,412,082
Liability	18,656,612	23,402,180	18,695,678	60,754,470
Equity	-	-	7,657,612	7,657,612

^(*) Other operational expenses and tax provision are presented at total column due to inability to allocate among the sections.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

Section five

Information and disclosures related to consolidated financial statements

- I. Explanations and notes related to assets of the consolidated balance sheet
 - 1. Information related to cash equivalents and the account of the Central Bank of the Republic of Turkey

1.1. Information on cash equivalents

	Current period			Prior period	
	TL	FC	TL	FC	
Cash in TL / foreign currency Balances with the CB of Turkey Other	312,583 503,087 -	2,107,916 7,461,133	291,079 407,796 -	1,349,622 6,861,366 374	
Total	815,670	9,569,049	698,875	8,211,362	

1.2. Information related to the account of the Central Bank of Turkey

	Current period			Prior period	
	TL	FC	TL	FC	
Unrestricted demand deposit	503,087	1,767,153	407,796	1,850,723	
Restricted time deposit	<u>-</u>	2,474,851	-	2,281,923	
Reserve requirement	-	3,219,129	-	2,728,720	
Total	503,087	7,461,133	407,796	6,861,366	

As per the "Communiqué on Reserve Requirements" promulgated by the Central Bank, banks operating in Turkey must keep required reserves as of the balance sheet date in terms of TL, USD / EURO and gold at a rate ranging between 1% and 7% for Turkish lira deposits and liabilities depending on their maturity and at a rate ranging between 5% and 21% for foreign currency deposits and foreign currency other liabilities depending on their maturity. In accordance with the relevant communiqué, the Central Bank pays interest for the reserve requirements which are presented in terms of TL and USD.

TL 502,894 (31 December 2018: TL 406,495) of the TL reserve deposits provided over the average balance and TL 1,767,153 (31 December 2018: TL 1,850,723) of the FC reserve deposits provided over the average balance are presented under unrestricted demand deposit account.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

- I. Explanations and notes related to assets of the consolidated balance sheet (continued)
 - 2. Information on financial assets at fair value through profit / loss

2.1. Information on financial assets at fair value through profit / loss subject to repo transactions and those given as collateral / blocked

Financial assets at fair value through profit or loss subject to repo transactions and those given as collateral / blocked are stated below in net amount.

	Current period	Prior period
Unrestricted portfolio	43,856	21,385
Collateral / blocked	22,282	7,391
Total	66,138	28,776

2.2. Positive differences related to derivative financial assets held for trading

	Current period			Prior period
	TL	FC	TL	FC
Forward transactions	-	106,182	52	232,495
Swap transactions	873,586	68,055	247,509	82,713
Futures transactions	· -	, -	· -	-
Options	71	3,310	155	3,438
Other	-	-	-	-
Total	873,657	177,547	247,716	318,646

3. Information on banks and foreign banks accounts

3.1. Information on banks

	Current period			Prior period	
	TL	FC	TL	FC	
Banks	22,946	2,181,736	81,826	1,067,353	
Domestic	22,945	438,919	81,826	490,624	
Foreign	1	1,742,817	· -	576,729	
Headquarters and branches abroad	-	-	-	-	
Total	22,946	2,181,736	81,826	1,067,353	

As of 30 June 2019, restricted bank balance amounting to TL 127,695 (31 December 2018: TL 232,219) all of which is comprised of (31 December 2018: all amount) collaterals that is held by counter banks under CSA contracts and is calculated based on related derivatives market price.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

- I. Explanations and notes related to assets of the consolidated balance sheet (continued)
 - 4. Information on financial assets at fair value through other comprehensive income
 - 4.1. Financial assets at fair value through other comprehensive income subject to repotransactions and those given as collateral/blocked

Financial assets at fair value through other comprehensive income subject to repo transactions and those given as collateral / blocked with net amounts are shown in below table.

Financial assets measured at fair value through other comprehensive income:

	Current period	Prior period
Unrestricted portfolio	724,941	645,917
Repo transactions	2,239	2,166
Collateral / blocked (*)	-	-
Total	727,180	648,083

^(*) Consists of bonds given as collaterals by the Parent Bank to be a member of Interbank, BIST, Derivatives Exchange, Takasbank Money Markets and to operate in those markets.

4.2. Information on financial assets at fair value through other comprehensive income Financial assets measured at fair value through other comprehensive income:

	Current period	Prior period
Debt securities	733,442	658,605
Quoted to stock exchange	733,442	658,605
Not quoted	-	-
Equity certificates	8,447	8,286
Quoted to stock exchange	, <u>-</u>	, -
Not quoted	8,447	8,286
Provision for impairment (-)	(14,709)	(18,808)
Total	727,180	648,083

5. Information on loans

5.1. Information on the balance of all types of loans and advances given to shareholders and employees of the Parent Bank

	Current period			Prior period
	Cash	Non-cash	Cash	Non-cash
Direct loans granted to shareholders of				
the Parent Bank	64	574,688	71	570,374
Corporate shareholders	-	574,688	-	570,374
Real person shareholders	64	-	71	-
Indirect loans granted to shareholders of				
the Parent Bank	-	191,169	-	200,958
Loans granted to employees of the				
Parent Bank	27,332	-	29,302	-
Total	27,396	765,857	29,373	771,332

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

I. Explanations and notes related to assets of the consolidated balance sheet (continued)

5.2. Information on the first and second group loans and other receivables including restructured or rescheduled loans

		Loans and other receivables under close monitoring			
Cash loans	Standard loans	Loans and receivables not	Restructured loans and receivables		
		subject to restructuring	Revised contract terms	Refinance	
Non-specialized loans	33,141,402	5,107,330	1,252,426	_	
Business loans	17,095,604	3,132,731	728,055	_	
Export loans	4,749,883	557,909	71,052	_	
Import loans	 -	, -	-	_	
Loans given to financial sector	1,305,289	85,830	-	_	
Consumer loans	8,119,373	1,146,534	401,354	_	
Credit cards	683,727	127,818	51,965	_	
Other	1,187,526	56,508	, -	_	
Specialized loans	 -	, -	-	_	
Other receivables	-	-	-	-	
Total	33,141,402	5,107,330	1,252,426	-	

		Current period		Prior period
		Loans and other receivables under		Loans and other receivables under
	Standard loans	close monitoring	Standard loans	close monitoring
12 Month Expected Credit Losses	188,758	9	180,771	-
Loans	168,944	-	165,450	-
Other assets	7,716	9	7,367	-
Banks and money market				
placements	11,945	-	7,801	-
Marketable securities	153	-	153	-
Lifetime expected credit losses				
significant increase in credit risk	-	353,005	-	389,419
Loans	-	353,005	-	389,419
Total	188,758	353,014	180,771	389,419

5.3. Loans according to their maturity structure

Not prepared as per Article 25 of the Communiqué on the Financial Statements and Related Explanations and Notes that will be Publicly Announced.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

I. Explanations and notes related to assets of the consolidated balance sheet (continued)

5.4. Information on consumer loans, individual credit cards, personnel loans and credit cards given to personnel

	Short term	Medium and long term	Total
Consumer loans – TL	642,376	8,801,788	9,444,164
Mortgage loans	844	3,434,987	3,435,831
Automotive loans	27,066	352,375	379,441
General purpose loans	614,466	5,014,426	5,628,892
Other	_	-	-
Consumer loans – indexed to FC	43	432	475
Mortgage loans	43	432	475
Automotive loans	_	-	_
General purpose loans	-	_	_
Other	-	<u>-</u>	_
Consumer loans – FC	_	_	_
Mortgage loans	_	_	_
Automotive loans	-	_	_
	-	-	-
General purpose loans	-	-	-
Other	750.004	-	700.005
Consumer credit cards – TL	759,824	32,401	792,225
With installments	231,293	32,401	263,694
Without installments	528,531	=	528,531
Consumer credit cards – FC	-	-	-
With installments	-	-	-
Without installments	-	-	-
Personnel loans - TL	2,476	15,254	17,730
Mortgage loans	· -	· <u>-</u>	-
Automotive loans	_	-	_
General purpose loans	2,476	15,254	17,730
Other	_,	-	-
Personnel loans – indexed to FC	_	_	_
Mortgage loans	_	_	_
Automotive loans	_	_	_
	_	_	_
General purpose loans Other	-	-	-
Personnel loans – FC	-	-	-
	-	-	-
Mortgage loans	-	-	-
Automotive loans	-	=	-
General purpose loans	-	-	-
Other	-	=	-
Personnel credit cards – TL	9,666	-	9,666
With installments	3,085	-	3,085
Without installments	6,581	-	6,581
Personnel credit cards – FC	-	-	-
With installments	-	-	-
Without installments	-	-	_
Overdraft accounts – TL (real person)	204,892	_	204,892
Overdraft accounts – FC (real person)	-	-	
Total	1,619,277	8,849,875	10,469,152

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

I. Explanations and notes related to assets of the consolidated balance sheet (continued)

5.5. Information on commercial loans with installments and corporate credit cards

		Medium and	
	Short term	long term	Total
Commercial installment loans - TL	553,620	5,659,013	6,212,633
Real estate loans	-	36,798	36,798
Automotive loans	335	136,169	136,504
General purpose loans	-	, -	, -
Other	553,285	5,486,046	6,039,331
Commercial installment loans – indexed to FC	42	118,196	118,238
Real estate loans	-	4,878	4,878
Automotive loans	-	22,481	22,481
General purpose loans	-	, -	-
Other	42	90,837	90,879
Commercial installment loans-FC	-	13,502	13,502
Real estate residential loans	-	-	-
Automotive loans	-	-	-
General purpose loans	-	-	-
Other	-	13,502	13,502
Corporate credit cards – TL	61,619	-	61,619
With installments	17,034	-	17,034
Without installments	44,585	-	44,585
Corporate credit cards – FC	-	-	-
With installments	-	-	-
Without installments	-	-	-
Overdraft loans – TL (legal entity)	182,056	-	182,056
Overdraft loans – FC (legal entity)	· -	-	-
Total	797,337	5,790,711	6,588,048

5.6. Loans according to borrowers

Not prepared as per Article 25 of the Communiqué on the Financial Statements and Related Explanations and Notes that will be Publicly Announced.

5.7. Domestic and foreign loans

	Current period	Prior period
Domestic loans	39,351,179	44,478,592
Foreign loans	149,979	409,214
Total	39,501,158	44,887,806

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

I. Explanations and notes related to assets of the consolidated balance sheet (continued)

5.8. Loans granted to subsidiaries and associates

The loans granted to subsidiaries and associates are eliminated at the consolidated financial statements.

5.9. Specific provisions set aside against loans

	Current period	Prior period
Loans and receivables with limited collectability	85,696	141,226
Loans and receivables with doubtful collectability	327,419	164,068
Uncollectible loans and receivables	905,663	759,555
Total	1,318,778	1,064,849

5.10. Information on non-performing loans (net)

5.10.1. Information on non-performing loans and other receivables restructured or rescheduled

	Group III	Group IV	Group V
	Loans and receivables with limited collectability	Loans and receivables with doubtful collectability	Uncollectible loans and receivables
Current period Gross amounts before specific provision Rescheduled Loans	1,260	3,127	4,568
	1,260	3,127	4,568
Prior period Gross amounts before specific provision Rescheduled Loans	222	509	4,720
	222	509	4,720

5.10.2. Information on total non-performing loans

	Group III	Group IV	Group V
	Loans and receivables with limited collectability	Loans and receivables with doubtful collectability	Uncollectible loans and receivables
Prior period end balance	702,887	383,292	1,002,611
Additions (+)	772,758	11,248	10,334
Transfers from other categories of non-performing loans (+)	-	992,890	332,592
Transfers to other categories of non-performing loans (-)	(992,890)	(332,592)	-
Collections (-)	(125,493)	(80,318)	(77,208)
Write-offs (-)	(295)	(20)	(4,727)
Sold Portfolio (-)	` -	` <u>-</u>	` -
Corporate and commercial loans	-	-	-
Retail loans	-	-	-
Credit cards	-	-	-
Other	-	-	-
Current period end balance	356,967	974,500	1,263,602
Provisions (-)	(85,696)	(327,419)	(905,663)
Net balance on balance sheet	271,271	647,081	357,939

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

I. Explanations and notes related to assets of the consolidated balance sheet (continued)

5.10.3. Information on foreign currency non-performing loans and other receivables

	Group III	Group IV	Group V
	Loans and receivables with limited collectability	Loans and receivables with doubtful collectability	Uncollectible loans and receivables
Current period			
Balance at the end of the period	13,134	30,183	43,947
Provision (-)	1,296	11,543	19,803
Net balance on balance sheet	11,838	18,640	24,144
Prior period			
Balance at the end of the period	19,589	2,647	41,827
Provision (-)	4,191	1,447	32,414
Net balance on balance sheet	15,398	1,200	9,413

Non-performing loans granted as foreign currency are followed under TL accounts at the balance sheet.

5.10.4. Gross and net amounts of non-performing loans per customer categories

	Group III	Group IV	Group V
	Loans and	Loans and	
	receivables with	receivables with	Uncollectible
	limited	doubtful	loans and
	collectability	collectability	receivables
Current period (net)	271,271	647,081	357,939
Loans granted to corporate entities and real person (gross)	332,560	974,500	1,256,206
Provision amount(-)	(80,120)	(327,419)	(898,267)
Loans granted to corporate entities and real person (net)	252,440	647,081	357,939
Banks (gross)	-	-	-
Provision amount (-)	-	-	-
Banks (net)	-	-	-
Other loans (gross)	24,407	-	7,396
Provision amount (-)	(5,576)	-	(7,396)
Other loans (net)	18,831	-	-
Prior period (net)	561,661	219,224	243,056
Loans granted to corporate entities and real person (gross)	676,253	383,292	994,380
Provision amount (-)	(136,996)	(164,068)	(751,324)
Loans granted to corporate entities and real person (net)	539,257	219,224	243,056
Banks (gross)	-	-	-
Provision amount (-)	-	-	-
Banks (net)	-	-	-
Other loans (gross)	26,634	-	8,231
Provision amount (-)	(4,230)	-	(8,231)
Other loans (net)	22,404	-	-

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

I. Explanations and notes related to assets of the consolidated balance sheet (continued)

5.10.5. According to TFRS 9, accruals, valuation differences and related provisions calculated for non-performing loans

	Group III	Group IV	Group V
	Loans and receivables with limited collectability	Loans and receivables with doubtful collectability	Uncollectable loans and receivables
Current period (Net)	12,257	24,476	4,324
Interest accruals and valuation differences	16,099	36,074	6,383
Provision (-)	(3,842)	(11,598)	(2,059)
Prior period (Net)	16,522	4,492	-
Interest accruals and valuation differences	20,065	6,287	-
Provision (-)	(3,543)	(1,795)	-

5.11. Liquidation policy for uncollectible loans and receivables

Not prepared in compliance with Article 25 of the Communiqué on the Financial Statements and Related Explanations and Notes to be Announced to Public by Banks.

5.12. Information on the write-off policy

Not prepared in compliance with Article 25 of the Communiqué on the Financial Statements and Related Explanations and Notes to be Announced to Public by Banks.

6. Financial assets measured at amortised cost

6.1. Financial assets subject to repurchase agreements and provided as collateral/blocked:

	Current period	Prior period
Investments subject to repurchase agreements Collateralized / blocked investments	- 284,678	386,219
Total	284,678	386,219

6.2. Government securities measured at amortised cost

	Current period	Prior period
Government bonds Treasury bills Other government securities	1,195,767 - -	1,194,996 - -
Total	1,195,767	1,194,996

6.3. Financial assets measured at amortised cost

	Current period	Prior period
Debt securities	1,195,767	1,194,996
Quoted to stock exchange	1,195,767	1,194,996
Not quoted	· · · · · · -	, , , -
Impairment provision (-)	-	-
Total	1,195,767	1,194,996

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

I. Explanations and notes related to assets of the consolidated balance sheet (continued)

6.4. Movement of financial assets measured at amortised cost

	Current period	Prior period
Balances at the beginning of the period	1,194,996	1,316,936
Foreign currency differences on monetary assets	-	-
Purchases during the period	-	-
Disposals through sales/redemptions	-	(142,041)
Provision for impairment (-)	-	-
Change in redemption cost	771	20,101
Period end balance	1,195,767	1,194,996

7. Information on associates (net)

7.1. Explanations related to the associates

The Parent Bank does not have any associates.

8. Information on subsidiaries (net)

8.1. Information on equity of subsidiaries

As of 30 June 2019 information on the equities of subsidiaries is as follows:

	ING European Financial			
	Services Plc.	ING Factoring	ING Leasing	ING Brokerage
Paid in capital and adjustment to paid-in				
capital	1,268	40,000	22,500	20,765
Profit reserves, capital reserves and prior	,	,	,	,
year profit / loss	-	79,138	109,766	5,708
Profit	35,960	15,937	18,929	3,487
Development cost of operating lease (-)	-	(3)	(3)	-
Intangible assets (-)	-	(55 5)	(362)	(21)
Total core capital	37,228	134,517	150,830	29,921
Supplementary capital	-	-	-	-
Capital	37,228	134,517	150,830	29,921
Net usable shareholder's equity	37,228	134,517	150,830	29,921

The Parent Bank does not have any additional capital requirements due to the subsidiaries, included in the consolidated calculation of capital requirement.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

I. Explanations and notes related to assets of the consolidated balance sheet (continued)

8.2. Information on consolidated subsidiaries

Title (*)	Address (City / Country)	The Parent Bank's share percentage-If different voting (%)	The Parent Bank's risk group share (%)
(1) ING European Financial Services Plc.	Dublin/Ireland	100%	100%
(2) ING Factoring	İstanbul/ Turkey	100%	100%
(3) ING Leasing	İstanbul/ Turkey	100%	100%
(4) ING Brokerage	İstanbul/ Turkey	100%	100%

^(*) The sale of the shares representing 100% of the capital of ING Portfolio Management, one of the subsidiaries of the Parent Bank, to TEB Portföy Yönetimi A.Ş has been completed on 31 May 2019.

As of 30 June 2019 financial information on consolidated subsidiaries as follows (*):

	Total assets	Shareholders'	Total fixed assets	Interest income	Income from marketable securities portfolio	Current period profit/ loss	Prior period profit/loss	Fair value
			_		-			
(1)	8,225,242	37,228	6	171,678	-	35,960	24,560	-
(2)	652,057	135,075	2,495	53,551	-	15,937	10,112	-
(3)	1,231,714	151,195	1,156	35,163	-	18,929	15,247	-
(4)	170,514	29,939	215	3,475	-	3,487	2,082	-

^(*) The financial information of ING European Financial Services Plc. and ING Leasing are obtained from 30 June 2019 unreviewed financial statements, the financial information of ING Factoring and ING Brokerage are obtained from 30 June 2019 reviewed financial statements.

8.3. Information on consolidated subsidiaries

	Current period	Prior period
Balance at the beginning of the period	95,907	95,907
Movements during the period	(12,308)	-
Purchases	` <u>-</u>	-
Bonus shares obtained	-	-
Dividends from current year income	-	-
Sales (*)	(12,308)	-
Revaluation increase	-	-
Provisions for impairment	-	-
Balance at the end of the period	83,599	95,907
Capital commitments	-	-
Share percentage at the end of the period (%)	100	100

^(*) A share sale and purchase agreement representing the 100% of capital of ING Portfolio Management has been signed between The Parent Bank and TEB Portföy Yönetimi A.Ş on 5 April 2019. The actual sales transaction and share transfer were completed on 31 May 2019 following the completion of necessary legal permissions and other procedures related to the sale in accordance with the agreement.

8.4. Sectoral information on consolidated financial subsidiaries and the related carrying amounts

	Current period	Prior period	
Banks	-	-	
Insurance companies	-	-	
Factoring companies	40,000	40,000	
Leasing companies	22,500	22,500	
Finance companies	· -	, -	
Other financial subsidiaries	21,099	33,407	

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

Explanations and notes related to assets of the consolidated balance sheet (continued)

8.5. Subsidiaries quoted in a stock exchange

There are no subsidiaries quoted on a stock exchange.

9. Information on entities under common control (net)

9.1. Information on entities under common control (net)

There are no entities under common control.

10. Information on derivative financial assets held for hedging

10.1 Investments made in finance lease as per their maturity

	Current period			Prior period	
	Gross	Net	Gross	Net	
Less than 1 year	60,308	59,040	63,387	61,946	
1-5 years	975,670	912,576	967,042	901,168	
More than 5 years	-	-	166,195	151,493	
Total	1,035,978	971,616	1,196,624	1,114,607	

10.2 Information of the net investments made in finance lease

	Current period	Prior period
Gross financial lease investment Unearned financial lease income (-) Cancelled leases (-)	1,035,978 (64,362)	1,196,624 (82,017) -
Net financial lease investment	971,616	1,114,607

11. Information on property and equipment (net)

Not prepared in compliance with Article 25 of the Communiqué on the Financial Statements and Related Explanations and Notes to be Announced to Public by Banks

11.1 Information on positive differences of derivative financial assets held for hedging

	Current period			Prior period	
	TL	FC	TL	FC	
Fair value hedge	_	_	_	-	
Cash flow hedge	1,973,071	5	2,968,911	-	
Net investment hedge	-	-	-	-	
Total	1,973,071	5	2,968,911	-	

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

I. Explanations and notes related to assets of the consolidated balance sheet (continued)

12. Information on tangible assets (net)

Not prepared in compliance with Article 25 of the Communiqué on the Financial Statements and Related Explanations and Notes to be Announced to Public by Banks.

13. Information on intangible assets (net)

Not prepared in compliance with Article 25 of the Communiqué on the Financial Statements and Related Explanations and Notes to be Announced to Public by Banks.

14. Information on investment properties (net)

The Group does not have investment properties.

15. Explanations on deferred tax asset

15.1. Explanations on current tax asset

As of 30 June 2019 current tax asset and corporation tax payable are netted of and accounted as current tax liability in the consolidated balance sheet. The explanations about current tax asset / liability for the current and previous period are disclosed in Note II.9 of Section Five.

15.2. Explanations on deferred tax asset

Deferred tax asset and liability are netted of based on the Parent Bank and each company subject to consolidation, and shown as deferred tax asset or liability in the consolidated balance sheet. The explanations about deferred tax asset / liability for the current and previous period are disclosed in Note II.9 of Section Five.

16. Explanations on assets held for sale and discontinued operations (net)

16.1. Explanations on assets held for sale

	Current period	Prior period
Opening balance (net)	660	660
Additions	-	-
Disposals (-)	-	-
Depreciation (-)	-	-
Balance at the end of the period (net)	660	660

16.2. Explanations on discontinued operations

The Group does not have assets with respect to the discontinued operations.

17. Other assets exceed 10% of the balance sheet total (excluding off balance sheet commitments), breakdown of the names and amounts of accounts constructing at least 20% of grand totals

Other assets in the balance sheet excluding off balance sheet commitments do not exceed 10% of the balance sheet total.

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Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

II. Explanations and notes related to liabilities of the consolidated balance sheet

1. Information on deposits

1.1 Maturity structure of deposits

Current period	Demand	7 day call accounts	Up to 1 month	1-3 months	3-6 months	6 months-1 year	1 year and over	Cumulative deposits	Total
•						•			
Saving deposits	686,079	-	14,015,575	3,352,361	207,316	97,414	74,101	-	18,432,846
Foreign currency deposits	2,771,653	-	6,845,125	3,196,016	139,760	78,714	17,744	-	13,049,012
Residents in Turkey	2,593,005	-	6,749,436	3,085,101	114,145	69,703	16,730	-	12,628,120
Residents abroad	178,648	-	95,689	110,915	25,615	9,011	1,014	-	420,892
Public sector deposits	260,801	-	-	11,071	77	-	-	-	271,949
Commercial deposits	586,237	-	791,775	233,737	4,416	12,933	17,859	-	1,646,957
Other institutions deposits	13,741	-	1,243	11,829	134	254	94	-	27,295
Precious metals deposits	213,605	-	-	-	-	-	-	-	213,605
Interbank deposits	2,323,776	-	-	-	-	-	-	-	2,323,776
Central Bank of Turkey	-	-	-	-	-	-	-	-	-
Domestic banks	1	-	-	-	-	-	-	-	1
Foreign banks	2,323,775	-	-	-	-	-	-	-	2,323,775
Participation banks	-	-	-	-	-	-	-	-	-
Other	-	-	-	-	-	-	-	-	-
Total	6,855,892	-	21,653,718	6,805,014	351,703	189,315	109,798	=	35,965,440
Drien newled	Demand	7 day call accounts	Up to 1 month	1-3 months	3-6 months	6 months-	1 year and over	Cumulative	Total
Prior period	Demand	accounts	1 month	1-3 months	months	1 year	over	deposits	Total
Saving deposits	536,506	-	13,392,719	3,403,652	410,389	159,553	59,788	-	17,962,607
Foreign currency deposits	1,923,472	-	4,799,089	2,677,206	139,011	122,450	202,156	-	9,863,384
Residents in Turkey	1,703,348	-	4,730,165	2,563,909	131,998	114,289	201,221	-	9,444,930
Residents abroad	220,124	-	68,924	113,297	7,013	8,161	935	-	418,454
Public sector deposits	241,369	-	_	9,941	719	_	-	-	252,029
Commercial deposits	560,766	-	812,430	273,833	13,975	7,281	37,585	-	1,705,870
Other institutions deposits	17,236	-	2,647	11,085	195	161	77	-	31,401
Precious metals deposits	170,212	-	· -		-	-	-	-	170,212
Interbank deposits	2,291,934	-	-	-	-	-	-	-	2,291,934
Central Bank of Turkey	-	-	-	-	-	-	-	-	_
Domestic banks	726	-	-	-	-	-	-	-	726
Foreign banks	2,291,208	-	-	-	_	-	-	-	2,291,208
Participation banks	-	-	-	-	-	-	-	-	-
Other	-	-	-	-	-	-	-	-	-
Total	5,741,495		19,006,885	6,375,717	564,289	289,445	299,606	_	32,277,437

1.2. Information on saving deposits under the guarantee of saving deposit insurance and exceeding the limit of saving deposit insurance

		rantee of saving	Exceeding the limit of saving deposit		
Saving deposits	Current period	Prior period	Current period	Prior period	
Saving deposit	12,655,286	12,397,645	5,769,938	5,560,491	
Foreign currency saving deposits	4,039,267	2,783,584	6,252,207	4,649,289	
Other deposits in the form of saving deposits	-	-	-	-	
Foreign branches' deposits under foreign					
authorities' insurance	-	-	-	-	
Deposits in off-shore banking regions' under					
foreign authorities' insurance	-	-	-	-	

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Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

- II. Explanations and notes related to liabilities of the consolidated balance sheet (continued)
 - 1.3. Information on whether the saving deposits / private current accounts of real persons not subject to commercial transactions in the Turkey branch of the Parent Bank headquartered abroad are in scope of insurance in the country where the head office is located

The Parent Bank's head office is in Turkey and its saving deposits are covered by saving deposit insurance.

1.4. Saving deposits of real persons not under the guarantee of saving deposit insurance fund

	Current period	Prior period
Deposits and other accounts in foreign branches	-	_
Saving deposits and other accounts of controlling shareholders and their		
mothers, fathers, spouses, children in care	-	-
Saving deposits and other accounts of president and members of board of directors, general manager and vice presidents, and their mothers, fathers,		
spouses and children in care	20,359	14,738
Saving deposits and other accounts in scope of the property holdings derived from crime defined in Article 282 of Turkish Criminal Law No: 5237, dated 26		
September 2004	-	-
Saving deposits in deposit bank established in Turkey in order to engage solely in off-shore banking activities	<u>-</u>	_

2. Information on derivative financial liabilities held for trading

2.1. Table of negative differences for derivative financial liabilities held for trading

	Cur	Current period		Prior period
	TL	FC	TL	FC
Forward transactions	-	23,732	_	88,476
Swap transactions	159,069	101,180	652,663	103,201
Future transactions	· -	-	· -	-
Options	100	3,646	262	3,754
Other	-	-	-	-
Total	159,169	128,558	652,925	195,431

3. Banks and other financial institutions

3.1. Information on banks and other financial institutions

	Current period			Prior period	
	TL	FC	TL	FC	
Funds borrowed from Central Bank of Turkey	_	_	_	_	
Funds borrowed from domestic banks and institutions	170,064	468,436	120,084	791,740	
Funds borrowed from foreign banks, institutions and funds	331,270	15,222,147	347,858	20,107,692	
Total	501,334	15,690,583	467,942	20,899,432	

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

II. Explanations and notes related to liabilities of the consolidated balance sheet (continued)

3.2. Maturity analysis of funds borrowed

	Cu	Current period		Prior period
	TL	FC	TL	FC
Short term	221,970	645,495	128,190	1,734,370
Medium and long term	279,364	15,045,088	339,752	19,165,062
Total	501,334	15,690,583	467,942	20,899,432

3.3. Funding industry group where the Group liabilities are concentrated

The Group's liabilities are concentrated on the main shareholder, ING Bank NV.

4. Explanations on securities issued (net)

The Group does not have any securities issued end of the reporting period (31 December 2018: None).

5. If other liabilities exceed 10% of the balance sheet total, names and amounts of the accounts constituting at least 20% of grand totals

Other liabilities do not exceed 10% of the balance sheet total.

6. Explanations on lease liabilities (net)

	Current period		Prior period	
	Gross	Net	Gross	Net
Less than 1 year More than 1 year	466,038	320,140 -	- -	-
Total	466,038	320,140	-	-

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

II. Explanations and notes related to liabilities of the consolidated balance sheet (continued)

7. Information on derivative financial liabilities held for hedging

7.1. Negative differences related to derivative financial liabilities held for hedging

	Current period		Prior period	
	TL	FC	TL	FC
Fair value hedge Cash flow hedge	- 356,040	- 9,151	- 258,878	- 4,528
Net investment hedge	-	-	-	-
Total	356,040	9,151	258,878	4,528

8. Information on provisions

8.1. Information on the exchange rate decrease provision on foreign currency indexed loans and financial lease receivables

None (31 December 2018: None).

8.2. Information on other provisions

	Current period	Prior period
Specific provisions for undrawn non-cash loans	31,090	28,294
Provision for credit card score promotion	2,012	1,833
Other provisions	118,420	187,289
Allowance for expected credit losses (Stage 1 and Stage 2) (*)	36,655	48,330
Other	81,765	138,959
Total	151,522	217,416

^(*) Non-cash loan provisions are included.

Amount to TL 68,489 (31 December 2018: TL 71,383) of the other provisions consist of provisions set aside as a result of the legal assessment for the lawsuits that are likely to result against the Parent Bank.

The deposit holders of off-shore accounts held at Sümerbank A.Ş. (together with other dissolved banks merged into Sümerbank A.Ş., all of which were ultimately merged into the Parent Bank), which were opened before Savings Deposit Insurance Fund (SDIF) seized these banks, initiates lawsuits against the Parent Bank (former title Oyak Bank A.Ş.). As a result of these lawsuits, the Parent Bank pays certain amounts to these off-shore deposit holders of the dissolved banks. SDIF indemnifies these amounts in accordance with the Share Transfer Agreement entered into between Turkish Armed Forces Assistance (and Pension) Fund (OYAK) and SDIF (STA).

SDIF, however, does not fully indemnify the Parent Bank and pays these amounts subject to legal reservation against the STA provisions. SDIF initiated six enforcement proceedings to claim the amount it had indemnified, a total of approximately TL 377 million. Upon the Parent Bank's objection to legal grounds of the enforcement proceedings initiated by SDIF against the Parent Bank, SDIF initiated cancellation of objection lawsuits against the Parent Bank. Currently, there are four of such lawsuits: (i) the first case relates to the first enforcement proceeding of approximately TL 21.8 million (Full TL) (the "First Case"), (ii) the second case relates to the second enforcement proceeding of approximately TL 21.8 million (Full TL) (the "Second Case"), (iii) the third case relates to the third and fifth enforcement proceedings of a total of approximately TL 98.7 million (Full TL) (the "Third Case") and (iv) the fourth case relates to the fourth enforcement proceeding of approximately TL 109,5 million (Full TL) (the "Fourth Case"). SDIF has not yet initiated a case in connection with the sixth enforcement proceeding of approximately TL 126 million (Full TL) against which the Parent Bank objected and SDIF filed a lawsuit (the "Sixth Case") for the cancellation of objection lawsuit. Furthermore, SDIF initiated the seventh enforcement procedure for approximately TL 52 million for payments made by SDIF in 2017 and the Parent Bank objected to this payment request. SDIF sued for this seventh enforcement and the case is going on the first instance court.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

II. Explanations and notes related to liabilities of the consolidated balance sheet (continued)

The First Case is before the first instance court following the appellate decision, where the court of first instance decided to obtain an expert opinion in accordance with the Supreme Court of Appeals' decision. Following the court appointed expert's examination of the case, the expert report is completed and it is in favor of the Parent Bank. The first instance court decided in favor of the Parent Bank however SDIF is entitled to appeal against the decision. The report prepared from the expert review is in favor of the parent bank; the case was rejected by the Court of First Instance in favor of the Parent Bank, with the Court of Cassation clear.

The first instance court held the trial of the Second Case, Third Case and Fourth Case together due to the first instance court's earlier decision to merge these cases. However, the first instance court only ruled on the merits of the Second Case in favor of Parent Bank. and rejected SDIF's claims and decided to demerge each of the Third Case and the Fourth Case from the Second Case. In the proceedings held after the court's demerger decision, the court decided in favor of the Parent Bank for each case. Also in the sixth case, the first instance court decided in favor of the bank. The court's decision in the Second Case and in the other cases are subject to a two-tiered appeal, i.e., appeal before the regional appellate court and the Supreme Court of Appeals.

On the other hand, there is an administrative law dispute between the Parent Bank and SDIF. The Parent Bank has filed a lawsuit for the annulment of the administrative resolution No. 2013/36 dated 31 January 2013 of SDIF's Fund Board (the "SDIF Fund Board Decision"), which constitutes the legal basis of the SDIF's abovementioned actions. Although the first instance administrative court ruled in favour of the Parent Bank to annul the SDIF Fund Board Decision, the Council of State (i.e., the Administrative Supreme Court of Appeals) reversed the first instance court's decision on the grounds that the administrative courts lack jurisdiction because the dispute was a matter of private law and not one of administrative law. The Parent Bank submitted a motion for the post judgment relief, i.e., correction of judgment which the Council of State rejected. Upon completion of the Council of State's review, the first instance court rendered a decision in line with the Council of State's decision against which the Parent Bank (claiming the annulment of the SDIF Fund Board Decision) and SDIF (claiming the determination of the SDIF Fund Board Decision's legal validity by the administrative courts rather than a lack of jurisdiction decision) filed an appeal.

No provisions were set aside in respect of the amounts that the Parent Bank paid in connection with the offshore lawsuits, court decisions on off-shore lawsuits and lawsuits filed by SDIF, considering the (i) relevant provisions of the STA, (ii) relevant provisions of the Share Purchase Agreement dated 18 June 2007 relating to the purchase of the Parent Bank's shares (owned by OYAK) by ING Bank N.V. and (iii) the course of the pending lawsuits against SDIF.

8.3. Information on employee benefits

As of 30 June 2019, TL 33,984 (31 December 2018: TL 30,779) of TL 58,174 (31 December 2018: TL 53,664) provisions for employee benefits is the unused vacation provisions. Full provision is provided for the unused vacation liability.

TL 24,190 (31 December 2018: TL 22,885) of the provisions for employee benefits is the termination benefit provision. In accordance with the labor law, the Group is required to make lump-sum payments to employees whose employment is terminated due to retirement or for reasons other than resignation and misconduct. The payments are calculated on the basis of 30 days' pay limited to a maximum of historical TL 6,017.60 (Full TL) at 30 June 2019 and TL 5,434.42 (Full TL) at 31 December 2018 per year of employment at the rate of pay applicable at the date of retirement or termination.

In the consolidated financial statements dated 30 June 2019 and 31 December 2018, the Group operating in Turkey has calculated severance pay by taking into account their experience in personnel service completion or termination, and by discounting it via using the forecasted annual inflation and interest rates.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

II. Explanations and notes related to liabilities of the consolidated balance sheet (continued)

9. Explanations on tax liability

9.1. Explanations on current tax liability

9.1.1. Explanations on tax provision

The Group has current corporate tax liability as of 30 June 2019 amounting to TL 101,983 (31 December 2018: TL 140,774).

9.1.2. Information on taxes payable

	Current period	Prior period
Corporate tax payable	101,983	140,774
Taxation of securities	48,781	42,224
Property tax	970	1,250
Banking insurance transaction tax ("BITT")	27,075	38,321
Foreign exchange transaction tax	1,278	-
Value added tax payable	4,846	5,571
Other	9,512	10,569
Total	194,445	238,709

9.1.3. Information on premiums

	Current period	Prior period
Social security premiums-employee	5,318	4,869
Social security premiums-employer	7,615	7,128
Bank social aid pension fund premium-employee	-	-
Bank social aid pension fund premium-employer	-	-
Pension fund membership fees and provisions-employee	-	-
Pension fund membership fees and provisions-employer	-	-
Unemployment insurance-employee	396	352
Unemployment insurance-employer	725	678
Other	-	-
Total	14,054	13,027

9.2. Explanations on deferred tax liabilities

As of 30 June 2019, deferred tax asset and deferred tax liability of the Group amounts to TL 4,145 and TL 409,401, respectively (31 December 2018: deferred tax asset is TL 11,293 and deferred tax liability is TL 430,595) which is calculated based on the deductible temporary differences.

		Current period		Prior period
Timing differences constituting the basis for deferred tax	Accumulated temporary differences	Deferred tax asset / (liability)	Accumulated temporary differences	Deferred tax asset / (liability)
Provisions (*) Fair value differences for financial assets and	156,485	32,240	213,843	44,555
liabilities	(8,641)	(1,299)	(39,562)	(7,820)
Derivative valuation differences	(2,709,925)	(563,688)	(2,828,546)	(595,560)
Expected credit losses of Stage I and II	578,427	127,254	618,520	136,074
Other	1,431	237	15,677	3,449
Total deferred tax (liabilities) net		(405,256)		(419,302)

^(*) Consists of reserve for employee benefits, provision for promotion expenses of credit cards and other provisions.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

II. Explanations and notes related to liabilities of the consolidated balance sheet (continued)

Deferred tax assets / (liabilities) movements of the current and previous years are as follows:

Deferred tax assets / (liabilities) net	Current period (1 January – 30 June 2019)	Prior period (1 January – 30 June 2018)
Prior period beginning balance	(419,302)	(330,524)
TFRS 9 effect	· · · · · · · · · · · · · · · · · · ·	77,316
Opening balance	(419,302)	(253,208)
Deferred tax income / (expense) net	(63,644)	(168,544)
Deferred tax recognized under equity	77,690	(133,982)
Balance at the end of the period	(405,256)	(555,734)

10. Information on liabilities regarding assets held for sale

As of 30 June 2019 and 31 December 2018, there are no liabilities regarding assets held for sale.

11. Explanations on the subordinated loans

	Current period			Prior period	
	TL	FC	TL	FC	
To be included in the calculation of additional capital borrowing					
instruments	-	-	-	-	
Subordinated loans	-	-	-	-	
Subordinated debt instruments	-	-	_	_	
Debt instruments to be included					
in contribution capital calculation	-	4,141,975	-	3,813,522	
Subordinated loans	-	4,141,975	-	3,813,522	
Subordinated debt instruments	-	-	-	-	
Total	-	4,141,975	-	3,813,522	

^(*) In accordance with the 9th Clause of the 8th Article of the "Regulation on Equity of Banks", subordinated loans of the parent bank amounting to USD 102 million and EUR 90 million and USD 91 million and EUR 85 million are amortised by 20% and then included in Tier II Capital, as their remaining maturity is less than five years as of 30 June 2019.

12. Information on shareholders' equity

12.1. Paid-in capital

	Current period	Prior period
Common stock (*) Preferred stock	3,486,268	3,486,268

^(*) The amount represents nominal capital.

12.2. Paid-in capital amount, explanation as to whether the registered share capital system is applicable at bank; if so, the amount of registered share capital ceiling

Paid-in-capital amount is TL 3,486,268, and registered share capital system is not applied.

12.3. Information on share capital increases and their sources; other information on increased capital shares in current period

There is no capital increase in the current period by the capital increases and their sources.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

II. Explanations and notes related to liabilities of the consolidated balance sheet (continued)

12.4. Information on share capital increases from capital reserves

There is no capital increase from capital reserves in the current period.

12.5 Capital commitments in the last fiscal year and in the interim period following the last fiscal year, the general purpose of these commitments and projected resources required to meet these commitments

There are no capital commitments in the last fiscal year and in the interim period following the last fiscal year.

12.6. Indicators of the Group's income, profitability and liquidity for the previous periods and possible effects of future assumptions made by taking into account the uncertainties of these indicators on the Group's equity:

The Group's consolidated balance sheet is managed in a conservative manner in order to be minimally affected by interest, currency and credit risks. The Group's operations are aimed to be continued with a conservative approach and with an increasing profitability. The year-end income is transferred to the statutory reserves and extraordinary reserves under the shareholder's equity. The Group tries to invest the majority of its shareholder's equity in interest bearing assets and to keep investments in non-banking assets such as tangible assets, investments in non-financial subsidiaries limited.

12.7. Information on preferred shares

There are no preferred shares.

12.8. Information on marketable securities revaluation reserve

	Curre	nt period		Prior period
	TL	FC	TL	FC
From associates, subsidiaries, and entities under common control	_	-	-	_
Valuation difference	(1,343)	-	(13,421)	-
Foreign exchange difference	-	-	-	-
Total	(1,343)	-	(13,421)	-

12.9. Profit reserves and profit distribution

Under the Turkish Commercial Code ("TCC"), legal reserves consist of first legal reserve and second legal reserve. First legal reserve, appropriated at the rate of 5%, until the total reserve is equal to 20% of issued and fully paid-in share capital. Second legal reserve, appropriated at the rate of at least 10% of distributions in excess of 5% of issued and fully paid-in share capital.

As per the decision made at the annual general assembly of shareholders of the Bank on 21 March 2019, the distribution of the net profit of the year 2018, is as follows.

Profit distribution table of 2018	
2018 net profit	1,061,760
A – I. Legal Reserve (TCC 519/A) 5%	(53,088)
B – The First Dividend for Shareholders	· , ,
C – Extraordinary Reserves	(1,007,695)
D – Special funds	(977)

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

III. Explanations and notes related to consolidated off-balance sheet accounts

1. Explanations on off-balance sheet commitments

1.1. Type and amount of irrevocable commitments

	Current period	Prior period
Forward asset purchase commitments	1,737,412	1,299,103
Forward deposit purchase and sales commitments	-	-
Loan granting commitments	1,767,457	1,823,151
Commitments for cheque payments	350,452	352,249
Commitments for credit card limits	1,398,498	1,553,684
Commitments for credit cards and banking services promotions	5,257	5,479
Other irrevocable commitments	26,150	24,162
Total	5,285,226	5,057,828

1.2. Type and amount of probable losses and obligations arising from off-balance sheet items

1.2.1 Non-cash loans including guarantees, bank acceptances, collaterals and others deemed as financial commitments and other letter of credits

	Current period	Prior period
Letter of credits	1,155,847	1,764,338
Commitments and contingencies Bank acceptance loans	532,280 33,524	473,848 39,370
Total	1,721,651	2,277,556

1.2.2. Irrevocable guarantees, temporary guarantees and other similar commitments and contingencies

	Current period	Prior period
Irrevocable letters of guarantees	5,445,138	5,552,334
Cash loans letters of guarantees	716,534	354,480
Advance letters of guarantees	857,018	569,482
Temporary letters of guarantees	80,258	54,865
Other	83,579	78,752
Total	7,182,527	6,609,913

1.3. Explanation on non-cash loans

1.3.1. Total amount of non-cash loans

	Current period	Prior period
Non each loans given against each loans	047 494	602.260
Non-cash loans given against cash loans	947,484	602,360
With original maturity of 1 year or less than 1 year	248,436	97,091
With original maturity of more than 1 year	699,048	505,269
Other non-cash loans	7,956,694	8,285,109
Total	8,904,178	8,887,469

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

III. Explanations and notes related to consolidated off-balance sheet accounts (continued)

1.3.2. Information on sectoral risk concentrations of non-cash loans

Not prepared in compliance with Article 25 of the Communiqué on the Financial Statements and Related Explanations and Notes to be Announced to Public by Banks.

1.3.3. Non-cash loans classified in Group I and Group II

Not prepared in compliance with Article 25 of the Communiqué on the Financial Statements and Related Explanations and Notes to be Announced to Public by Banks.

2. Information on derivative transactions

Not prepared in compliance with Article 25 of the Communiqué on the Financial Statements and Related Explanations and Notes to be Announced to Public by Banks.

3. Information on credit swaps and related risks

Not prepared in compliance with Article 25 of the Communiqué on the Financial Statements and Related Explanations and Notes to be Announced to Public by Banks.

4. Information on contingent liabilities and assets

Not prepared in compliance with Article 25 of the Communiqué on the Financial Statements and Related Explanations and Notes to be Announced to Public by Banks.

5. Information on the services provided on behalf of others

Not prepared in compliance with Article 25 of the Communiqué on the Financial Statements and Related Explanations and Notes to be Announced to Public by Banks.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

IV. Explanations and notes related to consolidated statement of profit or loss

1. Information on interest income

1.1. Information on interest income from loans

	Current period		Prior period	
	TL	FC	TL	FC
Interest on loans (*)	2,622,322	418,547	2,488,600	315,209
Short term loans	866,238	49,475	897,344	22,880
Medium and long term loans	1,652,974	369,072	1,549,053	292,329
Interest on loans under follow-up	103,110	· <u>-</u>	42,203	· <u>-</u>
Premiums received from resource utilization	,		,	
support fund	-	-	-	-

^(*) Commissions and fees received from cash loans are included.

1.2. Information on interest income received from banks

	Current period		Prior period	
	TL	FC	TL	FC
From Central Bank of Turkey	-	-	_	_
From domestic banks	33,334	5,411	17,837	1,858
From foreign banks	208	34,118	302	4,115
From branches abroad	-	-	-	-
Total	33,542	39,529	18,139	5,973

1.3. Information on interest income received from marketable securities portfolio

	Current period		Prior period	
	TL	FC	TL	FC
Financial assets measured at fair value through				
profit or loss	9,176	266	20,648	255
Financial assets measured at fair value through other				
comprehensive income	54,059	-	25,663	-
Financial assets measured at amortised cost	116,282	-	71,228	-
Total	179,517	266	117,539	255

1.4 Information on interest income received from associates and subsidiaries

The interest income from subsidiaries is eliminated in the accompanying consolidated financial statements.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

IV. Explanations and notes related to consolidated statement of profit or loss (continued)

2. Information on interest expenses

2.1. Information on interest on funds borrowed

	Current period		P	Prior period	
	TL	FC	TL	FC	
Banks (*)	39,343	242,238	65,634	218,429	
Central Bank of Turkey	-	· <u>-</u>	· -	-	
Domestic banks	13,073	2,552	7,449	2,158	
Foreign banks	26,270	239,686	58,185	216,271	
Branches and offices abroad	, -	-	-	-	
Other institutions (*)	-	2,632	-	3,537	
Total	39,343	244,870	65,634	221,966	

^(*) Commissions and fees paid for cash funds borrowed are included.

2.2. Information on interest expenses paid to associates and subsidiaries

The interest expenses paid to subsidiaries are eliminated in the consolidated financial statements.

2.3. Information on interest on securities issued

	Curi	Current period		Prior period	
	TL	FC	TL	FC	
				_	
Interest on securities issued	-	-	11,344	-	

2.4. Allocation of interest expenses on deposits according to maturity of deposits

				Time de	posit			Total
	Demand		Up to 3	Up to 6	-	More than	Accumulated	
Account name	deposit	Up to 1 month	months	months	Up to 1 year	1 year	deposits	
Turkish lira								
Bank deposits	_	666	-	-	-	_	-	666
Saving deposits	_	1,293,310	342,607	26,859	14,731	9,423	-	1,686,930
Public sector deposits	_	-	1,391	96	, - -	-	-	1,487
Commercial deposits	_	66,402	32,584	1,433	1,066	2,803	-	104,288
Other deposits	_	128	955	10	8	16	_	1,117
7 days call accounts	-	-	-	-	-	-	-	-
Total	-	1,360,506	377,537	28,398	15,805	12,242	-	1,794,488
Foreign currency								
Foreign currency								
deposits	-	54,783	37,400	1,575	1,509	987	-	96,254
Banks deposits	-	6,464	-	_	-	-	-	6,464
7 days call accounts	-	-	-	-	-	-	-	-
Precious metal								
deposits	=	-	-	-	-	-	-	-
Total	-	61,247	37,400	1,575	1,509	987	-	102,718
Grand total	-	1,421,753	414,937	29,973	17,314	13,229	-	1,897,206

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

IV. Explanations and notes related to consolidated statement of profit or loss (continued)

3. Information on dividend income

Not prepared in compliance with Article 25 of the Communiqué on the Financial Statements and Related Explanations and Notes to be Announced to Public by Banks.

4. Information on trading income/loss (net)

	Current period	Prior period
Income	15,037,642	14,267,031
Gains on capital market transactions	42,373	13,480
Gains on derivative financial instruments	8,541,588	6,397,482
Foreign exchange gains	6,453,681	7,856,069
Loss (-)	(14,590,380)	(14,489,659)
Loss on capital market transactions	(41,513)	(37,101)
Loss on derivative financial instruments	(7,832,599)	(4,990,881)
Foreign exchange loss	(6,716,268)	(9,461,677)

Net loss on derivative financial instruments recognized in profit/loss resulting from fluctuations in foreign exchange rates is TL 184,535 (30 June 2018: TL 1,285,922 net loss).

5. Information on other operating income

	Current period	Prior period
Income from reversal of prior years' provisions	281,387	537,089
Income arising from sale of assets	5,766	11,513
Banking services income	1,533	2,646
Other non-interest income	35,105	30,412
Total	323,791	581,660

6. Provision expenses for loan losses and other receivables

Allowance for expected credit losses:

	Current period	Prior period
Expected credit losses	580,601	623,934
12-Month expected credit loss (Stage 1)	45,014	112,456
Expected credit loss significant increase in credit risk (Stage 2)	52,633	80,041
Expected credit loss impaired credits (Stage 3)	482,954	431,437
Impairment losses on securities	5	259
Financial assets measured at fair value through profit/loss	4	239
Financial assets measured at fair value through other comprehensive income	1	20
Impairment losses on associates, subsidiaries and joint-ventures	-	-
Associates	-	-
Subsidiaries	-	-
Joint ventures	-	-
Other	-	17,660
Total	580,606	641,853

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

IV. Explanations and notes related to consolidated statement of profit or loss (continued)

7. Information on other operating expenses

	Current period	Prior period
Descrives for ampleyee termination benefits	1 117	1 272
Reserves for employee termination benefits	1,447	1,372
Bank social aid fund deficit provision	-	=
Tangible assets impairment expense	5,000	
Depreciation expense of tangible assets	64,450	27,897
Intangible assets impairment expense	-	-
Goodwill impairment expense	-	-
Amortisation expense of intangible assets	14,732	11,617
Impairment expense of equity participations for which equity method is applied	-	_
Impairment expense for securities that to be disposed	_	-
Depreciation expense of securities that to be disposed	_	_
Impairment expense of held for sale tangible assets and discontinued		
operations	_	_
Other operating expenses	363,597	381,185
Operating lease expenses related with IFRS 16 exception (*)	7,591	58,187
Repair and maintenance expenses	16,908	14,523
Advertisement expenses	54,653	42,011
Other expenses	284.445	266.464
Loss on sales of assets	11.320	239
Other	120,587	115,669
Oulei	120,307	115,009
Total	581,133	537,979

^(*) Amount stated in prior period column (30 June 2018) represents all operating lease expenses.

8. Information on income / (loss) before taxes for continued and discontinued operations

Not prepared in compliance with Article 25 of the Communiqué on the Financial Statements and Related Explanations and Notes to be Announced to Public by Banks.

9. Information on tax provision for continued and discontinued operations

As of 30 June 2019, the corporate tax provision expense for the period is TL 187,772 (30 June 2018: TL 4,568), and the deferred tax expense is TL 63,644 (30 June 2018: TL 168,544 deferred tax expense).

10. Information on net operating income after taxes for continued and discontinued operations

Not prepared in compliance with Article 25 of the Communiqué on the Financial Statements and Related Explanations and Notes to be Announced to Public by Banks.

11. The explanations on net income / loss for the period

Interest income from regular banking transactions is TL 3,905,880 (30 June 2018: TL 3,138,900), while the interest expense is TL 2,214,825 (30 June 2018: TL 1,454,436).

There are no changes in estimations related to the items in the financial statements.

12. If the other items in the statement of profit or loss exceed 10% of the statement of profit or loss total, explanations on the sub-accounts amounting to at least 20% of these items

Other fees and commissions received amounting to TL 274,571 (30 June 2018: TL 276,805) has included TL 99,629 (30 June 2018: TL 75,798) resulting from the credit card fees and commissions, TL 53,279 (30 June 2018: TL 79,607) resulting from service fees and commissions from contracted merchants and TL 63,732 (30 June 2018: TL 62,722) resulting from insurance commissions.

Other fees and commissions paid amounting to TL 99,464 (30 June 2018: TL 114,639) has included TL 61,663 (30 June 2018: TL 83,408) resulting from credit card exchange commissions.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

V. Explanations and notes related to risk group of the Parent Bank

1. Volume of related party transactions, income and expense amounts involved and outstanding loan and deposit balances

1.1. Current period

Risk group of the Group	associat	ubsidiaries, tes and joint ventures artnerships)	Direct and indirect shareholders of the Parent Bank		Other entities included in the risk group	
	Cash	Non-cash	Cash	Non-cash	Cash	Non-cash
Loans and other receivables						
Beginning of the period	-	-	71	570,374	47	200,958
End of the period	-	-	64	574,688	51	191,169
Interest and commission income	-	-	1	603	-	140

1.2. Prior period

Risk group of the Group	associat	ubsidiaries, es and joint ventures artnerships)		et and indirect holders of the Parent Bank		ities included he risk group
	Cash	Non-cash	Cash	Non-cash	Cash	Non-cash
Loans and other receivables						
Beginning of the period	-	-	30	438,513	13	197,080
End of the period	-	-	71	570,374	47	200,958
Interest and commission income	-	-	79	290	-	196

1.3. Information on deposit balances of the risk group of the Group

Risk group of the Group	associates	sidiaries, and joint ventures nerships)	sharehold	d indirect ers of the rent Bank	Other entities included in the risk group	
	Current period	Prior period	Current period	Prior period	Current period	Prior period
Deposit						
Beginning of the period	-	-	25,152	8,426	2,400	3,070
End of the period	-	-	71,836	25,152	3,132	2,400
Interest expense on deposits	-	-	413	16	392	55

1.4. Information on forward and option agreements and other similar agreements entered into with the risk group of the Group

Risk group of the Group	Subsidiaries, a joint ventures		Direct and indirect shareholders of the Parent Bank		Other entities included in t		
	Current		Current		Current		
	period	Prior period	period	Prior period	period	Prior period	
Transactions at fair value							
through profit and loss							
Beginning of the period	-	-	11,502,875	9,971,955	20,039	33,080	
End of period	-	-	14,664,436	11,502,875	-	20,039	
Total profit/loss	-	-	(23,064)	(116,001)	19,285	72,901	
Transactions with hedging							
purposes							
Beginning of the period	-	-	-	-	-	-	
End of period	-	-	1,969,377	-	-	-	
Total profit/loss	-	-	(24,994)	-	-	-	

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

V. Explanations and notes related to the risk group of the Parent Bank (continued)

1.5. Information on placements made with the risk group of the Group

Risk group of the Group	Subsidiaries, associates and joint ventures (partnerships)		Direct and indirect Shareholders of the Parent Bank		Other entities included in the risk group	
	Current period	Prior period	Current period	Prior period	Current period	Prior period
Banks						
Beginning of the period	-	-	13,741	63,734	67,664	90,087
End of period	-	-	23,675	13,741	265,031	67,664
Interest income received	-	-	470	650	66	61

1.6. Information on loans borrowed from the risk group of the Group

Risk group of the Group	Sul associates ventures (par	•	Shareholders of the Other ent			itities included	
	Current period	Prior period	Current period	Prior period	Current period	Prior period	
Loans							
Beginning of the period	-	-	14,502,679	15,505,498	7,702	8,403	
End of period	-	-	12,082,593	14,502,679	47,292	7,702	
Interest and commission paid	-	-	97,559	138,250	801	181	

The Group also has subordinated loan amounting to TL 4,141,975 from its shareholder ING Bank NV as of 30 June 2019 (31 December 2018: TL 3,813,522).

1.7 Information regarding benefits provided to the Group's top management:

Benefits paid to key management personnel for the six-month period ended as of 30 June 2019 is amounting to TL 23,949 (30 June 2018: TL 19,108).

VI. Explanations and notes related to subsequent events

None.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

Section six

Interim review report

I. Explanations on the independent review report

The consolidated financial statements of the Parent Bank and its financial subsidiaries as of 30 June 2019, have been reviewed by KPMG Bağımsız Denetim ve Serbest Muhasebeci Mali Müşavirlik A.Ş. (The Turkish member firm of KPMG International Cooperative, a Swiss entity) and the review report dated 5 August 2019 is presented at the beginning of this report.

II. Explanations and notes prepared by independent auditors

There are no other significant footnotes and explanations related to the operations of the Group that is not mentioned above.

ING Bank A.Ş.

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (All amounts expressed in full of Turkish Lira ("TL") unless otherwise stated)

Section seven

Interim activity report

I. Interim consolidated activity report including the assessments of the Chairman and CEO on the interim activities

1. Overview

1.1. A summary of financial information relating to operating results for the year ended

Summary financial information on the consolidated financial statements of the Group for the period 30 June 2019 and 31 December 2018 is as follows.

Main balance sheet items

Million TL	Current period	Prior period	
Net loans	41,688	47,220	
Deposits	35,965	32,277	
Equity	8,317	7,658	
Total assets	67,267	68,412	

Main financial ratios

	Current period	Prior period	
Capital adequacy ratio	23.68%	21.11%	
Loans / Total assets	61.97%	69.02%	
Deposits / Total assets	53.47%	47.18%	
Non-performing loans / Total loans	6.16%	4.28%	
Income / Average capital (*)	23.05%	18.09%	
Income / Average assets (*)	2.58%	1.84%	
Expense / Income ratio (**)	38.70%	48.32%	

^(*) Items related to statement of profit or loss are included in the ratio calculation after annualization process.

1.2 Changes and the reason for changes made in the Articles of Association

In the accounting period, there has not been any change in the Articles of Association of the Parent Bank.

^(**) Prior period profit/loss amounts are for the six month period ended 30 June 2018.

ING Bank A.Ş.

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (All amounts expressed in full of Turkish Lira ("TL") unless otherwise stated)

I. Interim consolidated activity report including the assessments of the Chairman and CEO on the interim activities (continued)

1.3 Chairman's assessments of the operating period and expectations for the future

As in the first quarter of 2019, both the decisions of central banks across the globe and anticipation about the long-standing trade negotiations between the United States and China were closely followed in the second quarter as well. Within this framework, concerns about global trade, and therefore, about global economic growth strengthened expectations of new policy steps from the central banks in developed countries, particularly including the US Federal Reserve ("Fed") and the European Central Bank ("ECB"). In the meantime, the statements made by the US and Chinese Presidents following their meeting in late June signaled that tensions would remain in check. The financial markets in the developing countries performed more positively particularly compared to the second half of last year thanks to the more positive policy stance of the Fed and ECB, and consequently, the contribution of capital flows that turned relatively more positive.

And in Turkey, seasonally adjusted GDP growth reverted to positive with the contribution of various supportive steps aimed at the households and companies in the first quarter of the year after contracting in the previous three quarters. While the inflation maintained its overall downward trend, the balance of payments continued to recover. This recovery supported expectations that we may have left the worst behind in the economic rebalancing.

During this period, building on its faith in the Turkish economy, ING Turkey continued to create new opportunities powered by advancing technologies and new applications that will make a difference for its customers to stay a step ahead in parallel with its new generation banking approach. Moving forward, based on our belief in the national economy, we will continue both our pioneering role in new generation banking and our investments. I thank all our stakeholders, particularly our business partners, customers, employees, and main shareholder for their support and contributions.

John T. Mc Carthy Board Chairman

ING Bank A.Ş.

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (All amounts expressed in full of Turkish Lira ("TL") unless otherwise stated)

I. Interim consolidated activity report including the assessments of the Chairman and CEO on the interim activities (continued)

1.4 CEO's assessments of the operating period and expectations for the future

At ING Turkey, we operate in line with the goal of helping our employees and customers always to be step ahead in their professional and private lives, understand their demands and needs changing with technological developments, and continue to invest in accordance with our digitalization vision. We boost our innovative products and services focusing on digital channels, and mobile in particular, while supporting our digitalization process also through our new branch concept that has a customer-oriented design and setup. We are pleased to see the favorable reaction these steps receive from our customers.

In the first half of 2019, our bank performed successfully. Based on our consolidated financial data, the size of our assets were TRY 67.3 billion and our profit before tax were TRY 1,182 million as of 30 June 2019. Our shareholder's equity increased to TRY 8.3 billion and our capital adequacy ratio to 23.68%. Our bank's total loans were TRY 41.7 billion while our deposits increased to TRY 35.9 billion.

At ING Turkey, in line with our belief in our country's sustainable development in the future, we will continue to grow together with our customers and with Turkey. Both personally and on behalf of the ING Turkey management team, I thank our entire team and our business partners for their contributions in our Bank's successful performance in the first half of the year.

Pınar Abay

CEO

ING Bank A.Ş.

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (All amounts expressed in full of Turkish Lira ("TL") unless otherwise stated)

- I. Interim consolidated activity report including the assessments of the Chairman and CEO on the interim activities (continued)
 - 1.5 Explanations on the Parent Bank 's service types, activities, staff and branch number and Evaluation of the Parent Bank's sector position

The Parent Bank continues its services and operations with 3,395 employees and 223 domestic branches, as of 30 June 2019.

Sector information on June 2019 has not been published yet. According to the sector information disclosed as of March 2019, Parent Bank is the 8th biggest private bank in terms of total assets, loans and deposits.

1.6 Information on research and development about new services and activities

In the accounting period, there has not been any change in the Parent Bank's research and development process about new service and operations.

2. Assessments about financial position and risk management

2.1 Information on Audit Committee's operations in accounting period

The Parent Bank's Ordinary General Assembly meeting was held on 21 March 2019. With the division of duties resolution, no. 18/1, dated 21 March 2019, M. Semra Kuran was elected as Chairman and Adrianus Johannes Antonius Kas was elected as member of the Audit Committee.

2.2 An assessment on financial status, profitability and solvency

According to the consolidated financial statements as of 30 June 2019, the asset size of the Group is TL 67.3 billion, and profit before tax is TL 1,182 million. As of 30 June 2019, credits constitute 62% of total assets with TL 41.7 billion.

According to consolidated financial statements, deposits which is the primary funding source of the Group, constitutes 53% of the balance sheet with TL 35.9 billion as of 30 June 2019. Even though the large base deposit structure covering small investments represents a short term source in the sector, it remains within the Parent Bank for much longer compared to the original term.

As of 30 June 2019, consolidated capital adequacy ratio of the Group has reached 23.68%. In addition, the Parent Bank has received subordinated loans from its main shareholder amounting to TL 4.1 billion. As of 30 June 2019, total equities of the Group has reached to TL 8.3 billion.

ING Bank A.Ş.

Notes to the consolidated financial statements as of and for the six-month period ended 30 June 2019 (continued) (All amounts expressed in full of Turkish Lira ("TL") unless otherwise stated)

I. Interim consolidated activity report including the assessments of the Chairman and CEO on the interim activities (continued)

2.3 Information on the risk management policies applied by risk types

There has been no change in the accounting period.

2.4 Information on whether ratings are determined by rating agencies

International credit rating agency Fitch Ratings Ltd. has confirmed the Parent Bank's credit ratings as of 19 July 2019 as follows:

Long-term Foreign Currency Rating: B+ (Outlook: Negative)
Long-Term Local Currency: BB- (Outlook: Negative)
Short-term Foreign Currency Rating: B
Short Term Local Currency: B
Support Rating: 4
National Long-Term Notes (*): AA (tur) (Outlook: Stable)

Viability Rating (*): b+

(*) The relevant credit ratings are current as of 28 February 2019.

International credit rating agency Moody's has confirmed the credit rating of the Parent Bank as of 18 June 2019 as follows:

Turkish Lira Long Term Deposit Rating: B1 (Outlook: Negative) Short-term Turkish Lira Deposit Notes: Not-Prime Long-term Foreign Currency Deposit Rating: B3 (Outlook: Negative)

Short-term Foreign Currency Deposit Rating: Not-Prime

Baseline Credit Assessment – (BCA): caa1

National Scale Note Aa1.tr/TR-1