

**(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 Nine-Month Period Ended
30 September 2019 and Independent
Auditors' Review Report

1 November 2019

*This report consists 2 pages of "Independent Auditors' Review
Report" and 83 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 September 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 nine-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 September 2019 and its consolidated financial performance and its consolidated cash flows for the nine-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

1 November 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 nine-month period ended 30 September 2019

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The nine-month 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.

<u>Subsidiaries</u>	<u>Investments in associates</u>	<u>Joint ventures</u>
1. ING European Financial Services Plc.	None	None
2. NG Finansal Kiralama A.Ş.		
3. ING Faktoring A.Ş.		
4. ING Menkul Değerler A.Ş.		

The accompanying nine-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.

<u>John T. Mc CARTHY</u> Chairman of the Board	<u>Pınar ABAY</u> President and CEO	<u>K. Atıl ÖZUS</u> CFO	<u>M. Gökçe ÇAKIT</u> Financial Reporting and Tax Director
	<u>M. Semra KURAN</u> Chairman of the Audit Committee	<u>Adrianus J. A. KAS</u> Audit Committee Member	

Contact information of the personnel in charge of addressing questions 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 nine-month period ended 30 September 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 İstanbul 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 İstanbul 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 RegisTL 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 İstanbul 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 RegisTL Gazette numbered 8608 and dated 9 July 2014.

(Convenience translation of the independent auditors' report and consolidated financial statements originally issued in Turkish, See Note 1.b of section three)

ING Bank A.Ş. and its Financial Subsidiaries

Notes to consolidated financial statements

as of and for the nine-month period ended 30 September 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 September 2019 and 31 December 2018 are as follows:

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

As of 30 September 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 September 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 Sali Salieski 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.

Marco Bragadin's share with a nominal value of TL 1 (full TL) was transferred to Sali Salieski on 20 August 2019.

(Convenience translation of the independent auditors' report and consolidated financial statements originally issued in Turkish, See Note 1.b of section three)

ING Bank A.Ş. and its Financial Subsidiaries

Notes to consolidated financial statements

as of and for the nine-month period ended 30 September 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 September 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 Edibođlu	BoD Member	Legally declared
Sali Salieski	BoD Member	Legally declared
Pınar 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

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.

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

Sali Salieski has been appointed as member of Board of Director per the Board of Directors resolution No. 48/1 and dated 7 August 2019, after completion of the BRSA process, he started his duty as of 17 September 2019.

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

(Convenience translation of the independent auditors' report and consolidated financial statements originally issued in Turkish, See Note 1.b of section three)

ING Bank A.Ş. and its Financial Subsidiaries

**Notes to consolidated financial statements
as of and for the nine-month period ended 30 September 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 220 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

(Convenience translation of the independent auditors' report and consolidated financial statements originally issued in Turkish, See Note 1.b of section three)

ING Bank A.Ş. and its Financial Subsidiaries

Consolidated balance sheet (statement of financial position)

as of 30 September 2019

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

Assets	Note (section five)	Reviewed			Audited		
		Current period			Prior period		
		TL	FC	Total	TL	FC	Total
I. Financial assets (net)		12,049,469	10,570,953	22,620,422	8,999,453	9,624,383	18,623,836
1.1 Cash and cash equivalents		8,435,330	10,080,553	18,515,883	5,132,989	9,278,715	14,411,704
1.1.1 Cash and balances at Central Bank	(I-1)	1,086,354	8,447,409	9,533,763	698,875	8,211,362	8,910,237
1.1.2 Banks	(I-3)	79,089	1,633,144	1,712,233	81,826	1,067,353	1,149,179
1.1.3 Money market placements		7,275,812	-	7,275,812	4,360,089	-	4,360,089
1.1.4 Expected credit losses (-)	(I-5)	(5,925)	-	(5,925)	(7,801)	-	(7,801)
1.2 Financial assets at fair value through profit or loss	(I-2)	4,065	71,249	75,314	1,962	26,814	28,776
1.2.1 Government securities		3,974	71,249	75,223	1,914	26,814	28,728
1.2.2 Equity instruments		35	-	35	35	-	35
1.2.3 Other financial assets		56	-	56	13	-	13
1.3 Financial assets at fair value through other comprehensive income	(I-4)	1,233,064	211	1,233,275	647,875	208	648,083
1.3.1 Government securities		1,221,903	-	1,221,903	639,797	-	639,797
1.3.2 Equity instruments		11,161	211	11,372	8,078	208	8,286
1.3.3 Other financial assets		-	-	-	-	-	-
1.4 Derivative financial assets		2,377,010	418,940	2,795,950	3,216,627	318,646	3,535,273
1.4.1 Derivative financial assets measured at fair value through profit or loss	(I-2)	1,456,382	418,560	1,874,942	247,716	318,646	566,362
1.4.2 Derivative financial assets measured at fair value through other comprehensive income	(I-11)	920,628	380	921,008	2,968,911	-	2,968,911
II. Financial assets measured at amortised cost		23,332,166	17,239,216	40,571,382	30,376,699	18,050,360	48,427,059
2.1 Loans	(I-5)	22,977,561	16,295,841	39,273,402	30,182,121	16,794,475	46,976,596
2.2 Receivables from leasing transactions	(I-10)	27,149	811,694	838,843	46,502	1,068,105	1,114,607
2.3 Factoring receivables		320,645	131,681	452,326	567,736	187,780	755,516
2.4 Other financial assets measured at amortised cost	(I-6)	1,905,013	-	1,905,013	1,194,996	-	1,194,996
2.4.1 Government securities		1,905,013	-	1,905,013	1,194,996	-	1,194,996
2.4.2 Other financial assets		-	-	-	-	-	-
2.5 Expected credit losses (-)	(I-5)	(1,898,202)	-	(1,898,202)	(1,614,656)	-	(1,614,656)
III. Non-currents assets or disposal 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)	(I-7)	-	-	-	-	-	-
4.1.1 Associates consolidated by using equity method		-	-	-	-	-	-
4.1.2 Unconsolidated associates		-	-	-	-	-	-
4.2 Investments in subsidiaries (net)	(I-8)	-	-	-	-	-	-
4.2.1 Unconsolidated financial subsidiaries		-	-	-	-	-	-
4.2.2 Unconsolidated non-financial subsidiaries		-	-	-	-	-	-
4.3 Jointly Controlled Partnerships (Joint Ventures) (net)	(I-9)	-	-	-	-	-	-
4.3.1 Joint ventures consolidated by using equity method		-	-	-	-	-	-
4.3.2 Unconsolidated joint ventures		-	-	-	-	-	-
V. Tangible assets (net)	(I-12)	1,030,059	5	1,030,064	684,290	7	684,297
VI. Intangible assets (net)	(I-13)	41,877	-	41,877	40,788	-	40,788
6.1 Goodwill		-	-	-	-	-	-
6.2 Other		41,877	-	41,877	40,788	-	40,788
VII. Investment property (net)	(I-14)	-	-	-	-	-	-
VIII. Current tax asset	(I-15)	-	-	-	-	-	-
IX. Deferred tax asset		6,456	-	6,456	11,293	-	11,293
X. Other assets (net)	(I-17)	589,158	14,212	603,370	602,285	21,864	624,149
Total assets		37,049,845	27,824,386	64,874,231	40,715,468	27,696,614	68,412,082

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

(Convenience translation of the independent auditors' report and consolidated financial statements originally issued in Turkish, See Note 1.b of section three)

ING Bank A.Ş. and its Financial Subsidiaries

Consolidated balance sheet (statement of financial position)

as of 30 September 2019

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

Liabilities	Note (section five)	Reviewed			Audited		
		TL	FC	Total	TL	FC	Total
				Current period (30/09/2019)			Prior period (31/12/2018)
I. Deposits	(II-1)	22,060,048	14,997,956	37,058,004	19,969,274	12,308,163	32,277,437
II. Loans received	(II-3)	302,202	12,212,627	12,514,829	467,942	20,899,432	21,367,374
III. Money market funds		8,838	63,563	72,401	2,166	20,450	22,616
IV. Securities Issued (net)	(II-4)	-	-	-	-	-	-
4.1 Bills		-	-	-	-	-	-
4.2 Asset backed securities		-	-	-	-	-	-
4.3 Bonds		-	-	-	-	-	-
V. Funds		-	-	-	-	-	-
5.1 Borrower funds		-	-	-	-	-	-
5.2 Other		-	-	-	-	-	-
VI. Financial liabilities at fair value through profit or loss		-	-	-	-	-	-
VII. Derivative financial liabilities		816,266	174,174	990,440	911,803	199,959	1,111,762
7.1 Derivative financial liabilities at fair value through profit or loss	(II-2)	306,338	165,814	472,152	652,925	195,431	848,356
7.2 Derivative financial liabilities at fair value through other comprehensive income	(II-7)	509,928	8,360	518,288	258,878	4,528	263,406
VIII. Factoring payables		23	789	812	26	620	646
IX. Lease payables (net)	(II-6)	304,799	1,570	306,369	-	-	-
X. Provisions	(II-8)	206,947	-	206,947	271,080	-	271,080
10.1 Provision for restructuring		-	-	-	-	-	-
10.2 Reserves for employee benefits		55,512	-	55,512	53,664	-	53,664
10.3 Insurance technical reserves (net)		-	-	-	-	-	-
10.4 Other provisions		151,435	-	151,435	217,416	-	217,416
XI. Current tax liability	(II-9)	251,742	362	252,104	250,939	797	251,736
XII. Deferred tax liability	(II-9)	225,947	-	225,947	430,595	-	430,595
XIII. Liabilities for assets held for sale and assets of discontinued operations (net)	(II-10)	-	-	-	-	-	-
13.1 Held for sale		-	-	-	-	-	-
13.2 Related to discontinued operations		-	-	-	-	-	-
XIV. Subordinated debt	(II-11)	-	3,946,929	3,946,929	-	3,813,522	3,813,522
14.1 Loans		-	3,946,929	3,946,929	-	3,813,522	3,813,522
14.2 Other debt instruments		-	-	-	-	-	-
XV. Other liabilities	(II-5)	782,011	142,315	924,326	1,058,514	149,188	1,207,702
XVI. Shareholders' equity	(II-12)	8,383,547	(8,424)	8,375,123	7,662,094	(4,482)	7,657,612
16.1 Paid-in capital		3,486,268	-	3,486,268	3,486,268	-	3,486,268
16.2 Capital reserves		-	-	-	-	-	-
16.2.1 Share premiums		-	-	-	-	-	-
16.2.2 Share cancellation profits		-	-	-	-	-	-
16.2.3 Other capital reserves		-	-	-	-	-	-
16.3 Other comprehensive income/expense items not to be recycled to Profit or Loss		139,542	-	139,542	139,276	-	139,276
16.4 Other comprehensive income/expense items to be recycled in Profit or Loss		(11,610)	(8,424)	(20,034)	598,124	(4,482)	593,642
16.5 Profit reserves		3,444,440	-	3,444,440	2,297,792	-	2,297,792
16.5.1 Legal reserves		256,871	-	256,871	201,819	-	201,819
16.5.2 Statutory reserves		-	-	-	-	-	-
16.5.3 Extraordinary reserves		3,187,569	-	3,187,569	2,095,973	-	2,095,973
16.5.4 Other profit reserves		-	-	-	-	-	-
16.6 Profit or (loss)		1,324,907	-	1,324,907	1,140,634	-	1,140,634
16.6.1 Prior years' profits or (loss)		-	-	-	-	-	-
16.6.2 Current period profit or (loss)		1,324,907	-	1,324,907	1,140,634	-	1,140,634
16.7 Minority interest		-	-	-	-	-	-
Total liabilities and shareholders' equity		33,342,370	31,531,861	64,874,231	31,024,433	37,387,649	68,412,082

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

(Convenience translation of the independent auditors' report and consolidated financial statements originally issued in Turkish, See Note 1.b of section three)

ING Bank A.Ş. and its Financial Subsidiaries

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

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

Off-balance sheet items	Note (section five)	Reviewed Current period (30/09/2019)			Audited Prior period (31/12/2018)		
		TL	FC	Total	TL	FC	Total
A. Off-balance sheet commitments (II+III)		37,400,281	84,023,019	121,423,300	46,655,305	63,802,736	110,458,041
I. Guarantees and warranties	(III-1)	1,904,875	6,515,217	8,420,092	2,163,251	6,724,218	8,887,469
1.1 Letters of guarantee		1,890,231	4,981,109	6,871,340	2,135,210	4,474,703	6,609,913
1.1.1 Guarantees subject to state tender law		6,139	-	6,139	14,570	-	14,570
1.1.2 Guarantees given for foreign trade operations		-	-	-	-	-	-
1.1.3 Other letters of guarantee		1,884,092	4,981,109	6,865,201	2,120,640	4,474,703	6,595,343
1.2 Bank acceptances		-	5,588	5,588	-	39,370	39,370
1.2.1 Import letter of acceptance		-	5,588	5,588	-	39,370	39,370
1.2.2 Other bank acceptances		-	-	-	-	-	-
1.3 Letters of credit		448	985,956	986,404	396	1,763,942	1,764,338
1.3.1 Documentary letters of credit		448	985,956	986,404	396	1,763,942	1,764,338
1.3.2 Other letters of credit		-	-	-	-	-	-
1.4 Pre-financing given as guarantee		-	-	-	-	-	-
1.5 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		10,567	79,128	89,695	25,318	99,940	125,258
1.8 Other guarantees		-	221,494	221,494	-	247,879	247,879
1.9 Other warranties		3,629	241,942	245,571	2,327	98,384	100,711
II. Commitments	(III-1)	3,684,256	2,398,504	6,082,760	4,144,632	913,196	5,057,828
2.1 Irrevocable commitments		3,684,256	2,398,504	6,082,760	4,144,632	913,196	5,057,828
2.1.1 Forward asset purchase commitments		273,079	1,511,777	1,784,856	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		-	-	-	-	-	-
2.1.4 Loan granting commitments		1,730,415	884,840	2,615,255	1,807,625	15,526	1,823,151
2.1.5 Securities underwriting commitments		-	-	-	-	-	-
2.1.6 Commitments for reserve requirements		-	-	-	-	-	-
2.1.7 Commitments for cheque payments		302,481	-	302,481	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		1,348,747	-	1,348,747	1,553,684	-	1,553,684
2.1.10 Commitments for credit cards and banking services promotions		5,375	-	5,375	5,479	-	5,479
2.1.11 Receivables from short sale commitments of marketable securities		-	-	-	-	-	-
2.1.12 Payables for short sale commitments of marketable securities		-	-	-	-	-	-
2.1.13 Other irrevocable commitments		379	1,887	2,266	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)	31,811,150	75,109,298	106,920,448	40,347,422	56,165,322	96,512,744
3.1 Derivative financial instruments for hedging purposes		13,928,892	3,512,417	17,441,309	21,984,936	4,734,539	26,719,475
3.1.1 Fair value hedges		-	-	-	-	-	-
3.1.2 Cash flow hedges		13,928,892	3,512,417	17,441,309	21,984,936	4,734,539	26,719,475
3.1.3 Net foreign investment hedges		-	-	-	-	-	-
3.2 Derivative financial instruments for trading purposes		17,882,258	71,596,881	89,479,139	18,362,486	51,430,783	69,793,269
3.2.1 Forward foreign currency buy/sell transactions		2,360,969	12,006,791	14,367,760	3,095,729	11,074,747	14,170,476
3.2.1.1 Forward foreign currency transactions-buy		1,972,439	5,243,962	7,216,401	2,553,730	4,648,919	7,202,649
3.2.1.2 Forward foreign currency transactions-sell		388,530	6,762,829	7,151,359	541,999	6,425,828	6,967,827
3.2.2 Swap transactions related to foreign currency and interest rates		15,053,593	56,965,854	72,019,447	15,051,633	38,647,276	53,698,909
3.2.2.1 Foreign currency swap-buy		1,713,044	23,272,402	24,985,446	3,332,426	18,037,056	21,369,482
3.2.2.2 Foreign currency swap-sell		4,370,549	19,590,976	23,961,525	10,579,207	11,431,226	22,010,433
3.2.2.3 Interest rate swap-buy		4,485,000	7,051,238	11,536,238	570,000	4,589,497	5,159,497
3.2.2.4 Interest rate swap-sell		4,485,000	7,051,238	11,536,238	570,000	4,589,497	5,159,497
3.2.3 Foreign currency, interest rate and securities options		467,696	2,624,236	3,091,932	181,758	1,708,760	1,890,518
3.2.3.1 Foreign currency options-buy		233,848	1,312,118	1,545,966	90,879	854,380	945,259
3.2.3.2 Foreign currency options-sell		233,848	1,312,118	1,545,966	90,879	854,380	945,259
3.2.3.3 Interest rate options-buy		-	-	-	-	-	-
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 Foreign currency futures		-	-	-	-	-	-
3.2.4.1 Foreign currency futures-buy		-	-	-	-	-	-
3.2.4.2 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)		198,295,382	30,645,385	228,940,767	236,801,620	46,253,124	283,054,744
IV. Items held in custody		1,400,160	1,959,534	3,359,694	980,400	1,952,616	2,933,016
4.1 Customer fund and portfolio balances		993,565	-	993,565	401,049	-	401,049
4.2 Investment securities held in custody		66,801	312,096	378,897	89,196	291,567	380,763
4.3 Checks received for collection		173,994	364,035	538,029	308,278	412,217	720,495
4.4 Commercial notes received for collection		153,318	1,222,942	1,376,260	169,395	1,143,098	1,312,493
4.5 Other assets received for collection		-	-	-	-	-	-
4.6 Assets received for public offering		-	-	-	-	-	-
4.7 Other items under custody		12,482	60,461	72,943	12,482	105,734	118,216
4.8 Custodians		-	-	-	-	-	-
V. Pledged received		26,613,402	6,846,083	33,459,485	36,573,782	9,371,568	45,945,350
5.1 Marketable securities		143,221	28,811	172,032	223,731	7,819	231,550
5.2 Guarantee notes		208,184	232,427	440,611	7,252,373	1,944,017	9,196,390
5.3 Commodity		910	-	910	910	-	910
5.4 Warranty		-	-	-	-	-	-
5.5 Properties		23,357,156	5,794,316	29,151,472	25,499,601	6,140,983	31,640,584
5.6 Other pledged items		2,903,931	790,529	3,694,460	3,597,167	1,278,749	4,875,916
5.7 Pledged items-depository		-	-	-	-	-	-
VI. Accepted independent guarantees and warranties		170,281,820	21,839,768	192,121,588	199,247,438	34,928,940	234,176,378
Total off-balance sheet items (A+B)		235,695,663	114,668,404	350,364,067	283,456,925	110,055,860	393,512,785

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

(Convenience translation of the independent auditors' report and consolidated financial statements originally issued in Turkish, See Note 1.b of section three)

ING Bank A.Ş. and its Financial Subsidiaries

Consolidated statement of profit or loss for the nine-month period ended 30 September 2019 (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

Income and expense items	Note (section five)	Reviewed	Reviewed	Reviewed	Reviewed
		Current period (01/01/2019- 30/09/2019)	Current period (01/07/2019- 30/09/2019)	Prior period (01/01/2018- 30/09/2018)	Prior period (01/07/2018- 30/09/2018)
I. Interest income	(IV-1)	5,754,121	1,848,241	5,164,363	2,025,463
1.1 Interest on loans		4,374,385	1,333,516	4,591,010	1,787,201
1.2 Interest on reserve requirements		64,487	18,928	53,665	20,078
1.3 Interest on banks		85,077	12,006	58,199	34,087
1.4 Interest on money market transactions		820,693	331,045	142,966	56,708
1.5 Interest on marketable securities portfolio		299,948	120,165	190,363	72,569
1.5.1 Financial assets at fair value through profit or loss		18,025	8,583	31,439	10,536
1.5.2 Financial assets at fair value through other comprehensive income		99,771	45,712	47,452	21,789
1.5.3 Financial assets measured at amortised cost		182,152	65,870	111,472	40,244
1.6 Finance lease income		34,009	9,915	41,683	16,722
1.7 Other interest income		75,522	22,666	86,477	38,098
II. Interest expense (-)	(IV-2)	(3,207,248)	(992,423)	(2,437,370)	(982,934)
2.1 Interest on deposits		(2,777,803)	(880,597)	(1,903,205)	(761,763)
2.2 Interest on funds borrowed		(385,515)	(101,302)	(498,224)	(210,624)
2.3 Interest on money market transactions		(6,148)	(259)	(10,230)	(3,295)
2.4 Interest on securities issued		-	-	(17,721)	(6,377)
2.5 Finance lease expense		(36,355)	(11,270)	-	-
2.6 Other interest expenses		(1,427)	1,005	(7,990)	(875)
III. Net interest income/expense (I - II)		2,546,873	855,818	2,726,993	1,042,529
IV. Net fees and commissions income/expense		365,711	116,297	358,808	131,126
4.1 Fees and commissions received		515,827	166,756	523,272	180,713
4.1.1 Non-cash loans		104,298	29,798	104,588	38,834
4.1.2 Other	(IV-12)	411,529	136,958	418,684	141,879
4.2 Fees and commissions paid (-)		(150,116)	(50,459)	(164,464)	(49,587)
4.2.1 Non-cash loans		(281)	(88)	(276)	(38)
4.2.2 Other	(IV-12)	(149,835)	(50,371)	(164,188)	(49,549)
V. Dividend income	(IV-3)	3,115	2,940	2	-
VI. Trading gain/(loss) (net)	(IV-4)	566,501	119,239	(206,156)	16,472
7.1 Trading gain/(loss) on securities		(1,579)	(2,439)	(37,231)	(13,610)
7.2 Gain/(loss) on derivative financial transactions		867,473	158,484	4,941,496	3,534,895
7.3 Foreign exchange gain/(loss)		(299,393)	(36,806)	(5,110,421)	(3,504,813)
VII. Other operating income	(IV-5)	431,934	108,143	605,410	23,750
VIII. Gross operating income (III+IV+V+VI+VII)		3,914,134	1,202,437	3,485,057	1,213,877
IX. Expected credit loss (-)	(IV-6)	(787,961)	(207,355)	(921,898)	(280,045)
X. Other provision expenses (-)		(6,489)	(1,020)	(27,860)	(21,011)
XI. Personnel expenses (-)		(544,261)	(181,427)	(476,796)	(160,368)
XII. Other operating expenses	(IV-7)	(891,829)	(310,696)	(805,316)	(267,337)
XIII. Net operating profit/(loss) (IX-X-XI)		1,683,594	501,939	1,253,187	485,116
XIV. Income resulted from mergers		-	-	-	-
XV. Income/loss from investments under equity accounting		-	-	-	-
XVI. Gain/loss on net monetary position		-	-	-	-
XVII. Operating profit/loss before taxes (XII+...+XV)	(IV-8)	1,683,594	501,939	1,253,187	485,116
XVIII. Provision for taxes of continued operations (±)	(IV-9)	(358,687)	(107,271)	(287,757)	(114,645)
18.1 Current tax provision		(396,103)	(208,331)	(14,575)	(10,007)
18.2 Expense effect of deferred tax (+)		(242,196)	(46,728)	(284,639)	(112,643)
18.3 Income effect of deferred tax (-)		279,612	147,788	11,457	8,005
XIX. Net profit/(loss) from continuing operations (XVI±XVII)	(IV-10)	1,324,907	394,668	965,430	370,471
XX. Income from discontinued operations		-	-	-	-
20.1 Income from non-current assets held for resale		-	-	-	-
20.2 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		-	-	-	-
XXII. Profit/(loss) before tax from discontinued operations (XIX-XX)		-	-	-	-
XXIII. Tax provision for discontinued operations (±)		-	-	-	-
23.1 Current tax provision		-	-	-	-
23.2 Expense effect of deferred tax (+)		-	-	-	-
23.3 Income effect of deferred tax (-)		-	-	-	-
XXIV. Net profit/(loss) from discontinued operations (XXI±XXII)		-	-	-	-
XXV. Net profit/(loss) (XVIII+XXIII)	(IV-11)	1,324,907	394,668	965,430	370,471
25.1 Profit/(Loss) from the Group		1,324,907	394,668	965,430	370,471
25.2 Income/(Loss) from Minority Interest (-)		-	-	-	-
Earnings per share		0.3800	0.1132	0.2769	0.1063

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

(Convenience translation of the independent auditors' report and consolidated financial statements originally issued in Turkish, See Note 1.b of section three)

ING Bank A.Ş. and its Financial Subsidiaries

Consolidated statement profit or loss and other comprehensive income for the nine-month period ended 30 September 2019 (Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise stated.)

Profit or loss and other comprehensive income		Reviewed	Reviewed
		Current period (01/01/2019- 30/09/2019)	Prior period (01/01/2018- 30/09/2018)
I.	Current period profit/loss	1,324,907	965,430
II.	Other comprehensive income	(613,857)	1,110,342
2.1	Other income/expense items not to be recycled to profit or loss	(711)	(1,555)
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)	(898)	(1,981)
2.1.4	Other income/(expense) items not to be recycled to profit or loss	-	15
2.1.5	Deferred taxes on other comprehensive income not to be recycled to profit or loss	187	411
2.2	Other income/expense items to be recycled to profit or loss	(613,146)	1,111,897
2.2.1	Translation differences	(3,002)	15,820
2.2.2	Income/(Expenses) from valuation and/or reclassification of financial assets measured at FVOCI	92,043	(55,983)
2.2.3	Gains/(losses) from cash flow hedges	(864,395)	1,447,856
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	162,208	(295,796)
III.	Total comprehensive income (I+II)	711,050	2,075,772

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

(Convenience translation of the independent auditors' report and consolidated financial statements originally issued in Turkish, See Note 1.b of section three)

ING Bank A.Ş. and its Financial Subsidiaries

Consolidated statement of changes in equity for the nine-month period ended 30 September 2019

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

Changes in equity

Statement of changes in shareholders' equity		Other comprehensive income/expense items not to be recycled to profit or loss				Other comprehensive income/expense items to be recycled to profit or loss				Total equity except from minority interest		Total shareholders' equity					
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)	Minority interest	Total	
Prior period																	
(01/01/2018-30/09/2018)																	
I.		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.		-	-	-	-	-	-	(399)	-	11,951	-	408,439	-	-	419,991	-	419,991
2.1		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2.2		-	-	-	-	-	-	(399)	-	11,951	-	408,439	-	-	419,991	-	419,991
III.		3,486,268	-	-	-	46,732	161	(256)	26,338	(4,597)	250,288	1,641,302	-	888,155	6,334,391	-	6,334,391
IV.		-	-	-	-	-	(1,570)	15	15,820	(43,718)	1,139,795	-	-	965,430	2,075,772	-	2,075,772
V.		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
VI.		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
VII.		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
VIII.		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
IX.		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
X.		-	-	-	-	-	-	-	(31,274)	-	-	31,274	-	-	-	-	-
XI.		-	-	-	-	94,189	-	-	-	-	-	625,216	-	(888,155)	(168,750)	-	(168,750)
11.1		-	-	-	-	-	-	-	-	-	-	(168,750)	-	-	(168,750)	-	(168,750)
11.2		-	-	-	-	94,189	-	-	-	-	-	793,966	-	(888,155)	-	-	-
11.3		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Period-end balance (III+IV+.....+X+XI)		3,486,268	-	-	-	140,921	(1,409)	(241)	10,884	(48,315)	1,390,083	2,297,792	-	965,430	8,241,413	-	8,241,413
Current period																	
(01/01/2019-30/09/2019)																	
I.		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
II.		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2.1		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2.2		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
III.		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.		-	-	-	-	-	(711)	-	(3,532)	72,970	(683,114)	-	-	1,324,907	710,520	-	710,520
V.		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
VI.		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
VII.		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
VIII.		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
IX.		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
X.		-	-	-	-	-	-	-	-	-	-	530	-	-	530	-	530
XI.		-	-	-	-	977	-	-	-	-	-	1,146,118	-	(1,140,634)	6,461	-	6,461
11.1		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11.2	(II-12)	-	-	-	-	977	-	-	-	-	-	1,146,118	-	(1,140,634)	6,461	-	6,461
11.3		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Period-end balance (III+IV+.....+X+XI)		3,486,268	-	-	-	141,898	(2,115)	(241)	326	59,790	(80,150)	3,444,440	-	1,324,907	8,375,123	-	8,375,123

(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)

(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)

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

ING Bank A.Ş. and its Financial Subsidiaries

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

Statement of Cash flows	Note	Reviewed	Reviewed
		Current period (01/01/2019- 30/09/2019)	Prior period (01/01/2018- 30/09/2018)
A. Cash flows from banking operations			
1.1 Operating profit/(loss) before changes in operating assets and liabilities		432,550	5,266,229
1.1.1 Interest received		5,804,949	4,810,175
1.1.2 Interest paid		(3,280,198)	(2,413,295)
1.1.3 Dividend received		3,115	2
1.1.4 Fees and commissions received		491,669	525,605
1.1.5 Other income		69,182	64,162
1.1.6 Collections from previously written-off loans and other receivables		566,605	465,906
1.1.7 Payments to personnel and service suppliers		(1,086,553)	(1,049,856)
1.1.8 Taxes paid		(320,903)	(119,362)
1.1.9 Other		(1,815,316)	2,982,892
1.2 Changes in operating assets and liabilities		3,875,585	(195,492)
1.2.1 Net increase/decrease in financial assets at fair value through profit or loss		(46,334)	(4,804)
1.2.2 Net (increase) decrease in due from bank		(39,046)	(219,289)
1.2.3 Net (increase) decrease in loans		8,902,161	(2,432,892)
1.2.4 Net (increase) decrease in other assets		1,983,612	(3,476,127)
1.2.5 Net increase (decrease) in bank deposits		(382,698)	2,228,231
1.2.6 Net increase (decrease) in other deposits		4,426,624	816,852
1.2.7 Net increase/decrease in financial liabilities at fair value through profit or loss		-	-
1.2.8 Net increase / (decrease) in funds borrowed		(9,854,836)	(344,925)
1.2.9 Net increase / (decrease) in payables		-	-
1.2.10 Net increase / (decrease) in other liabilities		(1,113,898)	3,237,462
I. Net cash provided from banking operations		4,308,135	5,070,737
B. Cash flow from investing activities			
II. Net cash provided from investing activities		(1,003,650)	(181,896)
2.1 Cash paid for acquisition of subsidiaries, investments in associates and joint ventures		-	-
2.2 Cash obtained from disposal of subsidiaries, investments in associates and joint ventures		13,223	-
2.3 Purchases of property and equipment		(175,813)	(191,619)
2.4 Disposals of property and equipment		316,198	90,151
2.5 Cash paid for purchase of financial assets at fair value through other comprehensive income		(506,212)	(218,817)
2.6 Cash obtained from sale of financial assets at fair value through other comprehensive income		15,836	-
2.7 Cash paid for purchase of financial assets measured at amortised cost		(723,851)	-
2.8 Cash obtained from sale of financial assets measured at amortised cost		56,969	142,041
2.9 Other		-	(3,652)
C. Cash flows from financing activities			
III. Net cash provided from financing activities		(83,208)	(64,750)
3.1 Cash obtained from funds borrowed and securities issued	(II-4)	-	265,000
3.2 Cash used for repayment of funds borrowed and securities issued	(II-4)	-	(161,000)
3.3 Issued equity instruments		-	-
3.4 Dividends paid	(II-12)	-	(168,750)
3.5 Payments for finance leases		(83,208)	-
3.6 Other		-	-
IV. Effect of change in foreign exchange rate on cash and cash equivalents		488,300	1,175,196
V. Net increase in cash and cash equivalents (I+II+III+IV)		3,709,577	5,999,287
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		15,129,968	11,182,339

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

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements as of and for the nine-month period ended 30 September 2019 (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.

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.

ING Bank A.Ş. and its Financial Subsidiaries

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

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 nine-month period ended 30 September 2019 (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 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 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 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 Bank A.Ş. and its Financial Subsidiaries

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

III. Explanation on consolidated subsidiaries (continued)

ING Menkul Değerler A.Ş. (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
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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.

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Notes to the consolidated financial statements as of and for the nine-month period ended 30 September 2019 (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 nine-month period ended 30 September 2019
(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.

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Notes to the consolidated financial statements as of and for the nine-month period ended 30 September 2019 (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 nine-month period ended 30 September 2019 (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, industTL 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 intends 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 nine-month period ended 30 September 2019 (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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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.

Immovables	2%
Movables, assets acquired by financial leasing	2% - 50%
Right-of-use assets	9% - 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

a. 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 "IFRS 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 IFRS 16 as they are below the materiality level and the corresponding rent payments are recognized under "Other Operating Expenses".

The impact and application of IFRS 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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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 lump-sum 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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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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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 September 2019 consolidated are prepared and previous period financial statements are revised in accordance with the "Communique amending the Communique on the Consolidated 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 borne 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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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:

	31 December 2018	TFRS 16 Reclassification Effect	TFRS 16 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.

(**) 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%.

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 11,548 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 extension or termination terms, the Group management's judgement and assessment are used for the determination of useful life of right-of-use assets.

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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 September 2019, the Group's total capital is TL 12,374,648 and the consolidated capital adequacy ratio is 25.43%. As of 31 December 2018, the Group's total capital amounted to TL 11,386,129 and capital adequacy ratio was 21.11%.

	Current period	Amount related to implementation before 01.01.2014 (*)
COMMON EQUITY Tier I Capital		
Paid-in capital to be entitled for compensation after all creditors	3,486,268	
Share premium	-	
Legal reserves	3,444,440	
Other comprehensive income according to TAS	201,773	
Profit	1,324,907	
Net profit for the period	1,324,907	
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	8,457,388	
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	2,115	
Leasehold improvements on operational leases (-)	32,942	
Goodwill netted off deferred tax liability (-)	-	
Other intangibles netted off deferred tax liability except for mortgage servicing rights	41,869	41,869
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 (-)	-	
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	76,926	
Total common equity tier I capital	8,380,462	
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 (-)	-	
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 (-)	-	
Total deductions from additional Tier I capital	-	
Total additional Tier I capital	-	
Total Tier I capital (Tier I Capital = Common Equity + Additional Tier I Capital)	8,380,462	

(*) 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".

(Convenience translation of the independent auditors' report and consolidated financial statements originally issued in Turkish, See Note 1.b of section three)

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I. Explanations on consolidated capital (continued)

	Current period	Amount related to implementation before 01.01.2014 (*)
TIER II CAPITAL		
Bank's borrowing instruments and issue premiums	3,507,464	-
Bank's borrowing instruments and issue premiums (in scope of Temporary Article 4)	-	-
Third parties' share in the Tier II Capital	-	-
Third 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)	492,597	-
Tier II Capital Before Deductions	4,000,061	-
Deductions From Tier II Capital		
Bank's direct and indirect investments in its own Tier II Capital (-)	-	-
Bank's 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 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	4,000,061	-
Total Capital (The sum of Tier I Capital and Tier II Capital)		
	12,380,523	-
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 (-)	5,875	-
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 Capital	12,374,648	-
Total risk weighted amounts	48,667,913	-
CAPITAL ADEQUACY RATIOS		
Core Capital Adequacy Ratio (%)	17.22	-
Tier I Capital Adequacy Ratio (%)	17.22	-
Capital Adequacy Ratio (%)	25.43	-
BUFFERS		
Total buffer requirement	2.64	-
Capital protection buffer requirement (%)	2.50	-
Bank specific cyclical buffer requirement (%)	0.14	-
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 (%)	11.22	-
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	185,262	-
Limits related to provisions considered in Tier II calculation		
General provisions for standard based receivables (before ten thousand twenty five limitation)	492,597	-
Up to 1.25% of total risk-weighted amount of general reserves for receivables where the standard approach used	492,597	-
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 Tier I Capital subject to Temporary Article 4	-	-
Amounts exceeding the upper limits of Additional Tier I Capital subject to Temporary Article 4	-	-
Upper limit for Additional Tier II Capital subject to temporary Article 4	-	-
Amounts exceeding the upper limits of Additional Tier II Capital subject to temporary Article 4	-	-

(*) 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".

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I. Explanations on consolidated capital (continued)

	Prior period	Amount related to implementation before 01.01.2014 (*)
COMMON EQUITY Tier I Capital		
Paid-in capital to be entitled for compensation after all creditors	3,486,268	
Share 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	13,421	
Leasehold improvements on operational leases (-)	39,962	
Goodwill netted off deferred tax liability (-)	-	
Other intangibles netted off deferred tax liability except for mortgage servicing rights	37,209	37,209
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 (-)	-	
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	-	
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 (-)	-	
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 (-)	-	
Total deductions from additional Tier I capital	-	
Total additional Tier I capital	-	
Total Tier I capital (Tier I Capital = Common Equity + Additional Tier I Capital)	6,977,477	

(*) 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".

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I. Explanations on consolidated capital (continued)

	Prior period	Amount related to implementation before 01.01.2014 (*)
TIER II CAPITAL		
Bank's borrowing instruments and issue premiums	3,807,119	-
Bank's borrowing instruments and issue premiums (in scope of Temporary Article 4)	-	-
Third parties' share in the Tier II Capital	-	-
Third 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	-
Tier 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 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	-
Total Capital (The sum of Tier I Capital and Tier II Capital)	11,394,051	-
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 Five Years	-	-
Other items to be defined by the BRSA (-)	7,922	-
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 Capital	11,386,129	-
Total risk weighted amounts	53,932,535	-
CAPITAL ADEQUACY RATIOS		
Core Capital Adequacy Ratio (%)	12.94	-
Tier I Capital Adequacy Ratio (%)	12.94	-
Capital Adequacy Ratio (%)	21.11	-
BUFFERS		
Total buffer requirement	1.912	-
Capital protection buffer requirement (%)	1.875	-
Bank specific cyclical buffer requirement (%)	0.037	-
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 (%)	6.937	-
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	188,440	-
Limits related to provisions considered in Tier II calculation		
General provisions for standard based receivables (before ten thousand twenty five limitation)	618,520	-
Up to 1.25% of total risk-weighted amount of general reserves for receivables where the standard approach used	609,455	-
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 Tier I Capital subject to Temporary Article 4	-	-
Amounts exceeding the upper limits of Additional Tier I Capital subject to Temporary Article 4	-	-
Upper limit for Additional Tier II Capital subject to temporary Article 4	-	-
Amounts exceeding the upper limits of Additional Tier II Capital subject to temporary Article 4	-	-

(*) 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".

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I. Explanations on consolidated capital (continued)

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

Issuer	ING Bank N.V.	ING Bank N.V.	ING Bank N.V.
Unique identifier (e.g. CUSIP, ISIN, etc.)	-	-	-
Governing law(s) of the instrument	BRSA	BRSA	BRSA
Regulatory treatment	Supplementary capital	Supplementary capital	Supplementary capital
Subject to 10% deduction as of 1/1/2015	No	No	No
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
Amount recognised in regulatory capital (Currency in million, as of most recent reporting date)	USD 82 million (TL 461 million) and EUR 72 million (TL 444 million)	USD 73 million (TL 411 million) and EUR 68 million (TL 419 million)	USD 62 million (TL 350 million) and EUR 231 million (TL 1,423 million)
Par value of instrument (Currency in million)	USD 102 million (TL 576 million) and EUR 90 million (TL 554million)	USD 91 million (TL 514 million) and EUR 85 million (TL 524 million)	USD 62 million (TL 350 million) and EUR 231 million (TL 1,423 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
Coupon rate and any related index	Libor+2.78% and Euribor+2.29%	Libor+2.27% and Euribor+2.17%	Libor+2.19% and 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	-	-	-

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I. Explanations on consolidated capital (continued)

Explanations on reconciliation of capital items to balance sheet

Risk classifications	Carrying amount	Amounts in equity calculation
Shareholders' equity	8,375,123	8,375,123
Gains from cash flow hedge transactions	(80,150)	80,150
Leasehold improvements on operational leases	32,942	(32,942)
Goodwill and intangible assets	41,877	(41,869)
General provision	492,597	492,597
Subordinated debt(*)	3,946,929	3,507,464
Other deductions from shareholders' equity	5,875	(5,875)
Capital		12,374,648

(*) 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 September 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 5.7078 (Full TL) and 6.2850 (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 September 2019)	5.6473	6.1601
Previous days;		
27 September 2019	5.6570	6.1882
26 September 2019	5.6635	6.2027
25 September 2019	5.6946	6.2453
24 September 2019	5.6991	6.2724
23 September 2019	5.7357	6.3035

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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	5,351,425	1,818,621	1,277,363	8,447,409
Banks	422,853	994,550	215,741	1,633,144
Financial assets at fair value through profit or loss	65,852	65,859	-	131,711
Money market placements	-	-	-	-
Financial assets measured at fair value through other comprehensive income	211	-	-	211
Loans	12,880,244	4,601,807	15,300	17,497,351
Investments in associates, subsidiaries and joint ventures	-	-	-	-
Financial assets measured at amortised cost	-	-	-	-
Hedging derivative financial assets	380	-	-	380
Tangible assets (net)	5	-	-	5
Intangible assets (net)	-	-	-	-
Other assets	7,412	5,366	114	12,892
Total assets	18,728,382	7,486,203	1,508,518	27,723,103
Liabilities				
Bank deposit	1,745,221	277,755	5	2,022,981
Foreign currency deposits	3,973,056	8,316,214	685,705	12,974,975
Funds from interbank money market	63,563	-	-	63,563
Borrowings	9,328,735	6,815,764	15,057	16,159,556
Marketable securities issued (net)	-	-	-	-
Miscellaneous payables	21,106	39,527	253	60,886
Hedging derivative financial liabilities	8,360	-	-	8,360
Other liabilities	53,104	38,835	1,447	93,386
Total liabilities	15,193,145	15,488,095	702,467	31,383,707
Net on balance sheet position	3,535,237	(8,001,892)	806,051	(3,660,604)
Net off-balance sheet position	(3,425,852)	8,002,026	(801,107)	3,775,067
Financial derivative assets	10,952,155	20,114,274	1,063,991	32,130,420
Financial derivative liabilities	14,378,007	12,112,248	1,865,098	28,355,353
Non-cash loans	1,933,553	4,385,775	195,889	6,515,217
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.

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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 358,098 (31 December 2018: TL 301,893).
Prepaid expenses: TL 1,320 (31 December 2018: TL 628).
Held-for trading derivative financial liabilities: TL 156,578 (31 December 2018: TL 181,638).
Hedge funds (Effective Portion): TL (8,424) (31 December 2018: TL (4,482)).
Interest rate swap (buy) transactions and options (buy): TL 8,067,650 (31 December 2018: TL 4,680,290).
Interest rate swap (sell) transactions and options (sell): TL 8,067,650 (31 December 2018: TL 4,680,290).

As of 30 September 2019, 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.

Forward foreign currency-buy transactions: TL 822,347 (31 December 2018: TL 454,812).
Forward foreign currency-sell transactions: TL 689,430 (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.

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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
Assets							
Cash (cash in vault, foreign currency cash, money in transit, checks purchased) and balances with the Central Bank of Turkey	7,331,336	-	-	-	-	2,202,427	9,533,763
Banks	1,402,956	3,638	-	-	-	305,639	1,712,233
Financial assets at fair value through profit and loss	582,900	1,062,079	137,079	164,005	4,102	91	1,950,256
Money market placements	7,275,812	-	-	-	-	-	7,275,812
Financial assets measured at fair value through other comprehensive income	270,392	755,579	446,104	670,836	-	11,372	2,154,283
Loans (***)	10,992,578	4,701,572	10,518,223	10,768,647	698,023	987,326	38,666,369
Financial assets measured at amortised cost	13,839	-	1,470,948	420,226	-	-	1,905,013
Other assets (*)	-	-	-	-	-	1,676,502	1,676,502
Total assets	27,869,813	6,522,868	12,572,354	12,023,714	702,125	5,183,357	64,874,231
Liabilities							
Bank deposits	2,022,968	-	-	-	-	14,842	2,037,810
Other deposits	28,390,310	1,924,222	123,875	1,629	-	4,580,158	35,020,194
Money market borrowings	8,838	-	-	63,563	-	-	72,401
Miscellaneous payables	97,505	-	-	-	-	327,305	424,810
Securities issued	-	-	-	-	-	-	-
Funds obtained from other financial institutions	8,094,343	5,931,461	913,237	1,522,717	-	-	16,461,758
Other liabilities (**)	429,813	529,729	112,178	88,315	-	9,697,223	10,857,258
Total liabilities	39,043,777	8,385,412	1,149,290	1,676,224	-	14,619,528	64,874,231
Balance sheet long position	-	-	11,423,064	10,347,490	702,125	-	22,472,679
Balance sheet short position	(11,173,964)	(1,862,544)	-	-	-	(9,436,171)	(22,472,679)
Off-balance sheet long position	-	3,252,649	-	-	-	-	3,252,649
Off-balance sheet short position	(173,112)	-	(732,109)	(225,509)	(216,637)	-	(1,347,367)
Total positions	(11,347,076)	1,390,105	10,690,955	10,121,981	485,488	(9,436,171)	1,905,282

(*) 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.

(**) 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.

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

Prior period	Up to 1 month	1-3 months	3-12 months	1-5 years	5 years and over	Non-interest 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	8,910,237
Due from other banks and financial institutions	540,755	12,383	-	-	-	596,041	1,149,179
Financial assets at fair value through profit and loss	141,628	189,714	247,324	16,424	-	48	595,138
Money market placements	4,358,089	2,000	-	-	-	-	4,360,089
Available-for-sale financial assets	30	263,210	8,849	367,708	-	8,286	648,083
Loans and receivables	7,710,048	4,801,283	10,924,225	21,243,744	2,078,629	461,705	47,219,634
Held-to-maturity investments	-	245,961	949,035	-	-	-	1,194,996
Other assets (*)	796,624	2,172,287	-	-	-	1,365,815	4,334,726
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	2,291,934
Other deposits	24,503,773	1,597,129	434,870	170	-	3,449,561	29,985,503
Money market borrowings	2,188	-	-	-	20,428	-	22,616
Miscellaneous payables	-	-	-	-	-	578,237	578,237
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	-	-	-	-	14,533,955
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.

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III. Explanations on consolidated interest rate risk (continued)

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

Current period	EURO (%)	USD (%)	Yen (%)	TL (%)
Assets				
Cash (Cash in vault, foreign currency cash, money in transit, checks purchased) and balances with the Central Bank of Turkey	-	-	-	13.00
Banks	(0.11)	1.76	-	16.58
Financial assets at fair value through profit and loss	2.07	6.32	-	12.06
Money market placements	-	-	-	15.53
Financial assets measured at fair value through other comprehensive income	-	-	-	16.31
Loans	3.42	5.76	-	19.55
Financial assets measured at amortised cost	-	-	-	17.58
Liabilities				
Bank deposits	(0.45)	1.83	-	-
Other deposits	0.39	1.77	0.05	13.81
Money market borrowings	-	-	-	10.00
Miscellaneous payables	-	-	-	-
Securities issued	-	-	-	-
Funds obtained from other financial institutions	0.89	3.55	-	15.51

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

Prior period	EURO (%)	USD (%)	Yen (%)	TL (%)
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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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	11,372	3,196	3,196
Equity investments	11,372	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

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

Current period	Carrying value	Total RWA	Minimum capital requirement (*)
Private equity investments	-	-	-
Shares traded on a stock exchange	-	-	-
Other equity shares	11,372	11,372	910
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".

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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.

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

ç. 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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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	193.03%	31 July 2019	267.80%	30 September 2019
FC	140.43%	31 July 2019	188.72%	30 September 2019

Liquidity coverage ratio

Current period	Total unweighted value (*)		Total weighted value(*)	
	TL+FC	FC	TL+FC	FC
High quality liquid assets				
High quality liquid assets			18,806,689	8,789,289
Cash Outflows				
Real person and retail deposits	29,905,390	10,287,988	2,536,070	1,028,799
Stable deposits	9,089,382	-	454,469	-
Less stable deposits	20,816,008	10,287,988	2,081,601	1,028,799
Unsecured funding other than real person and retail deposits	8,936,264	6,417,750	6,399,955	4,872,346
Operational deposits	145,604	7,741	36,401	1,935
Non-operational deposits	6,914,099	5,406,752	4,565,056	3,884,802
Other unsecured debt	1,876,561	1,003,257	1,798,498	985,609
Secured funding			-	-
Other cash outflows	15,998,158	8,390,476	6,056,352	3,317,218
Derivative exposures and collateral completion liabilities	4,534,210	2,288,112	4,534,210	2,288,112
Payables due to structured financial instruments	-	-	-	-
Payment commitments and other off-balance sheet commitments granted for debts to financial markets	11,463,948	6,102,364	1,522,142	1,029,106
Other contractual funding obligations	-	-	-	-
Other irrevocable or conditionally revocable off balance sheet liabilities	-	-	-	-
Total cash outflows			14,992,377	9,218,363
Cash inflows				
Secured lending	6,679,429	-	-	-
Unsecured lending	3,994,654	1,655,413	2,657,131	1,330,414
Other cash inflows	4,157,438	2,116,150	3,859,888	2,111,531
Total cash inflows	14,831,521	3,771,563	6,517,019	3,441,945
			Total adjusted value	
Total high quality liquid assets stock			18,806,689	8,789,289
Total net cash outflows			8,475,358	5,776,418
Liquidity coverage ratio (%)			226.57	156.92

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

(Convenience translation of the independent auditors' report and consolidated financial statements originally issued in Turkish, See Note 1.b of section three)

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

Prior period	Total unweighted value (*)		Total weighted value (*)	
	TL+FC	FC	TL+FC	FC
High quality liquid assets				
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	-	-	-
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
			Total adjusted value	
Total high quality liquid assets stock			12,904,684	9,163,222
Total net cash outflows			5,244,047	3,034,373
Liquidity coverage ratio (%)			247.41	307.45

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

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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 September 2019 are summarized as follows:

Foreign currency borrowings constitute the majority of the foreign currency liabilities. 51% of the Group's total foreign currency liabilities consist of funds obtained from other financial institutions and subordinated loans and 48% is composed of deposits. Loans comprise 62% and cash and cash equivalents comprise 36% 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 September 2019 are summarized as follows:

The majority of Turkish Lira balance sheet's liability consists of deposits. 66% 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. 58% of the assets in Turkish Lira balance sheet are loans granted, 23% are cash and cash equivalents and 8% 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.

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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 years	5 years and over	Unallocated	Total
Assets								
Cash (cash in vault, foreign currency cash, money in transit, checks purchased) and balances with the Central Bank of Turkey	4,121,985	5,411,778	-	-	-	-	-	9,533,763
Banks	618,868	1,089,727	3,638	-	-	-	-	1,712,233
Financial assets at fair value through profit or loss	-	290,633	148,645	538,536	967,234	5,117	91	1,950,256
Money market placements	-	7,275,812	-	-	-	-	-	7,275,812
Financial assets measured at fair value through other comprehensive income	-	105,158	3,429	655,730	1,371,727	6,867	11,372	2,154,283
Loans (***)	81,143	4,990,106	3,715,406	12,528,320	15,503,825	941,387	906,182	38,666,369
Financial assets measured at amortised cost	-	13,838	-	563,901	1,327,274	-	-	1,905,013
Other assets (*)	-	-	-	-	-	-	1,676,502	1,676,502
Total assets	4,821,996	19,177,052	3,871,118	14,286,487	19,170,060	953,371	2,594,147	64,874,231
Liabilities								
Bank deposits	2,037,810	-	-	-	-	-	-	2,037,810
Other deposits	4,717,741	28,252,727	1,924,222	123,875	1,629	-	-	35,020,194
Borrowings	-	388,790	921,673	4,645,864	8,494,297	2,011,134	-	16,461,758
Funds from interbank money market	-	8,838	-	-	63,563	-	-	72,401
Securities issued	-	-	-	-	-	-	-	-
Miscellaneous payables	216,758	-	-	-	-	-	208,052	424,810
Other liabilities (**)	-	463,307	169,977	304,882	317,123	42,332	9,559,637	10,857,258
Total liabilities	6,972,309	29,113,662	3,015,872	5,074,621	8,876,612	2,053,466	9,767,689	64,874,231
Liquidity deficit/surplus	(2,150,313)	(9,936,610)	855,246	9,211,866	10,293,448	(1,100,095)	(7,173,542)	-
Net Off Balance Sheet Position								
Derivative financial assets	-	61,818	138,264	333,543	1,370,039	-	-	1,903,664
Derivative financial liabilities	-	18,739,090	9,682,936	14,376,845	10,956,184	657,000	-	54,412,055
Non-cash loans	284,021	282,610	748,279	5,427,343	761,095	916,744	-	8,420,092
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
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								
Derivative financial assets	-	(129,729)	61,454	428,261	1,479,268	-	-	1,839,254
Derivative financial liabilities	-	10,246,576	14,094,606	12,174,323	12,130,335	530,159	-	49,175,999
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.

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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 September 2019, the Group's consolidated leverage ratio calculated by taking average of end of month leverage ratios for the last three-month is 9.66% (31 December 2018: 7.93%). This ratio is above the minimum ratio. The capital increased by 19% mainly as a result of increase in net profits. Therefore, the current period leverage ratio increased by 173 basis points compared to prior period.

	Current period (**)	Prior period (**)
Total assets in the consolidated financial statements prepared in accordance with TAS (*)	112,405,813	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	111,547	(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	(27,567,183)	(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	339,369	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	(77,976)	(56,792)
Total exposures	85,211,570	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.

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

Explanations on leverage ratio

	Current period (*)	Prior period (*)
On-balance sheet items		
On-balance sheet exposures (excluding derivatives and credit derivatives including collateral)	62,407,723	67,107,641
Asset deducted from core capital	(77,976)	(56,792)
The total amount of risk on-balance sheet exposures	62,329,747	67,050,849
Derivative financial instruments and credit derivative exposures		
Replacement cost associated with derivative financial instruments and credit derivatives	2,772,602	4,396,164
The potential credit risk amount of derivative financial instruments and credit derivatives	3,306,346	606,490
The total risk amount of derivative financial instruments and credit derivatives	6,078,948	5,002,654
Securities or commodity guaranteed financing transactions		
Risk amount of securities or commodity collateral financing transactions (excluding on balance sheet items)	339,369	145,863
Risk amount of exchange brokerage operations	-	-
The total risk amount of securities or commodity collateral financing transactions	339,369	145,863
Off-balance sheet items		
Gross notional amount for off-balance sheet items	16,463,506	15,338,848
Adjustments for conversion to credit equivalent amounts	-	-
The total amount of risk for off-balance sheet items	16,463,506	15,338,848
Capital and total exposures		
Core capital	8,222,100	6,932,004
Total exposures	85,211,570	87,538,214
Leverage ratio		
Leverage ratio	9.66	7.93

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

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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

	Current period	Risk weighted amount Previous period	Minimum capital requirement Current period
Credit risk (excluding counterparty credit risk) (CCR)	40,341,841	45,836,154	3,227,347
Standardized approach (SA)	40,341,841	45,836,154	3,227,347
Internal rating-based (IRB) approach	-	-	-
Counterparty credit risk	2,016,158	2,920,260	161,293
Standardized approach for counterparty credit risk (SA-CCR)	2,016,158	2,920,260	161,293
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	287,513	383,425	23,001
Standardized approach (SA)	287,513	383,425	23,001
Internal model approaches (IMM)	-	-	-
Operational risk	6,022,401	4,792,696	481,792
Basic indicator approach	6,022,401	4,792,696	481,792
Standard approach	-	-	-
Advanced measurement approach	-	-	-
The amount of the discount threshold under the equity (subject to a 250% risk weight)	-	-	-
Floor adjustment	-	-	-
Total	48,667,913	53,932,535	3,893,433

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VII. Explanations on consolidated risk management (continued)

2. Credit risk explanations

a. Assets credit quality

Not prepared in accordance with the Communiqué on Banks' Declaration on Public Disclosure of Risk Management.

b. Changes in stock of defaulted loans and debt securities

Not prepared in accordance with the Communiqué on Banks' Declaration on Public Disclosure of Risk Management.

c. Credit risk mitigation techniques

Not prepared in accordance with the Communiqué on Banks' Declaration on Public Disclosure of Risk Management.

ç. Credit risk exposure and credit risk mitigation effects

Not prepared in accordance with the Communiqué on Banks' Declaration on Public Disclosure of Risk Management.

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

Not prepared in accordance with the Communiqué on Banks' Declaration on Public Disclosure of Risk Management.

3. Counterparty credit risk (CCR) approach analysis

Not prepared in accordance with the Communiqué on Banks' Declaration on Public Disclosure of Risk Management.

4. Credit valuation adjustment (CVA) capital charge

Not prepared in accordance with the Communiqué on Banks' Declaration on Public Disclosure of Risk Management.

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

Not prepared in accordance with the Communiqué on Banks' Declaration on Public Disclosure of Risk Management.

6. Collaterals for counterparty credit risk (CCR)

Not prepared in accordance with the Communiqué on Banks' Declaration on Public Disclosure of Risk Management.

7. Credit derivatives

Not prepared in accordance with the Communiqué on Banks' Declaration on Public Disclosure of Risk Management.

8. Exposures to central counterparties (CCP)

Not prepared in accordance with the Communiqué on Banks' Declaration on Public Disclosure of Risk Management.

9. Explanations on securitisation

Not prepared in accordance with the Communiqué on Banks' Declaration on Public Disclosure of Risk Management.

10. Explanations on market risk

Not prepared in accordance with the Communiqué on Banks' Declaration on Public Disclosure of Risk Management.

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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.

Current period – 30 September 2019	Corporate, SME and Commercial Banking	Retail Banking	Other	Total
Net interest income	1,123,994	1,069,023	353,856	2,546,873
Net commissions and fees income and other operating income	418,879	320,736	58,030	797,645
Trading gain/loss	70,083	36,135	460,283	566,501
Dividend income	-	-	3,115	3,115
Provision for impairment of loans and other receivables	(694,790)	(87,312)	(5,859)	(787,961)
Segment results	918,166	1,338,582	869,425	3,126,173
Other operating expenses (**)				(1,442,579)
Income from continuing operations before tax				1,683,594
Tax provision (*)				(358,687)
Net profit				1,324,907

Prior period – 30 September 2018	Corporate, SME and Commercial Banking	Retail Banking	Other	Total
Net interest income	906,158	847,484	973,351	2,726,993
Net commissions and fees income and other operating income	495,286	391,569	77,363	964,218
Trading gain/loss	363,587	40,728	(610,471)	(206,156)
Dividend income	-	-	2	2
Provision for impairment of loans and other receivables	(401,448)	(492,998)	(27,452)	(921,898)
Segment results	1,363,583	786,783	412,793	2,563,159
Other operating expenses (**)				(1,309,972)
Income from continuing operations before tax				1,253,187
Tax provision (*)				(287,757)
Net profit				965,430

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

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

Current period – 30 September 2019	Corporate, SME and Commercial Banking	Retail Banking	Other	Total
Asset	30,012,106	10,902,956	23,959,169	64,874,231
Liability	17,774,847	27,720,308	11,003,953	56,499,108
Equity	-	-	8,375,123	8,375,123

Prior period – 31 December 2018	Corporate, SME 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

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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	340,982	1,861,183	291,079	1,349,622
Balances with the CB of Turkey	745,372	6,586,226	407,796	6,861,366
Other	-	-	-	374
Total	1,086,354	8,447,409	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	745,372	1,174,448	407,796	1,850,723
Restricted time deposit	-	2,322,348	-	2,281,923
Reserve requirement	-	3,089,430	-	2,728,720
Total	745,372	6,586,226	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.

Effective from 4 October 2019, the Central Bank of Turkey has inked the interest rate to be paid on TL reserve requirements with the total of TL denominated standard loans and close monitored loans excluding foreign currency indexed loans and loans extended to banks. In this context, the interest rate is determined as 10% for banks with annual loan growth rates between 10% and 20% and 0% for banks with annual loan growth rates other than 10 and 20 percent by the Central Bank of Turkey.

TL 745,110 (31 December 2018: TL 406,495) of the TL reserve deposits provided over the average balance and TL 1,174,448 (31 December 2018: TL 1,850,723) of the FC reserve deposits provided over the average balance are presented under unrestricted demand deposit account.

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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	30,191	21,385
Collateral / blocked	45,123	7,391
Total	75,314	28,776

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

	Current period		Prior period	
	TL	FC	TL	FC
Forward transactions	-	159,580	52	232,495
Swap transactions	1,456,239	257,676	247,509	82,713
Futures transactions	-	-	-	-
Options	143	1,304	155	3,438
Other	-	-	-	-
Total	1,456,382	418,560	247,716	318,646

3. Information on banks and foreign banks accounts

3.1. Information on banks

	Current period		Prior period	
	TL	FC	TL	YP
Banks	79,089	1,633,144	81,826	1,067,353
Domestic	76,187	104,828	81,826	490,624
Foreign	2,902	1,528,316	-	576,729
Headquarters and branches abroad	-	-	-	-
Total	79,089	1,633,144	81,826	1,067,353

As of 30 September 2019, restricted bank balance amounting to TL 282,427 (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.

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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 repo transactions 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	1,224,363	645,917
Repo transactions	8,912	2,166
Collateral / blocked (*)	-	-
Total	1,233,275	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	1,226,822	658,605
Quoted to stock exchange	1,226,822	658,605
Not quoted	-	-
Equity certificates	11,372	8,286
Quoted to stock exchange	-	-
Not quoted	11,372	8,286
Provision for impairment (-)	(4,919)	(18,808)
Total	1,233,275	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	142	546,004	71	570,374
Corporate shareholders	-	546,004	-	570,374
Real person shareholders	142	-	71	-
Indirect loans granted to shareholders of the Parent Bank	60	192,488	47	200,958
Loans granted to employees of the Parent Bank	28,366	-	29,302	-
Total	28,568	738,492	29,420	771,332

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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

Cash loans	Standard loans	Loans and other receivables under close monitoring		
		Loans and receivables not subject to restructuring	Restructured loans and receivables	
			Revised contract terms	Refinance
Non-specialized loans	31,322,046	4,022,518	1,125,392	-
Business loans	15,397,221	2,307,304	640,433	-
Export loans	4,423,855	541,267	43,869	-
Import loans	-	-	-	-
Loans given to financial sector	1,340,534	-	-	-
Consumer loans	8,078,747	1,012,661	392,558	-
Credit cards	649,997	113,825	48,532	-
Other	1,431,692	47,461	-	-
Specialized loans	-	-	-	-
Other receivables	-	-	-	-
Total	31,322,046	4,022,518	1,125,392	-

	Current period		Prior period	
	Standard loans	Loans and other receivables under close monitoring	Standard loans	Loans and other receivables under close monitoring
12 Month Expected Credit Losses	196,322	8	180,771	-
Loans	180,885	-	165,450	-
Other assets	9,268	8	7,367	-
Banks and money market placements	5,925	-	7,801	-
Marketable securities	244	-	153	-
Lifetime expected credit losses significant increase in credit risk	-	253,338	-	389,419
Loans	-	253,338	-	389,419
Total	196,322	253,346	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.

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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	690,383	8,577,123	9,267,506
Mortgage loans	509	3,286,566	3,287,075
Automotive loans	17,174	302,738	319,912
General purpose loans	672,700	4,987,819	5,660,519
Other	-	-	-
Consumer loans – indexed to FC	34	196	230
Mortgage loans	34	196	230
Automotive loans	-	-	-
General purpose loans	-	-	-
Other	-	-	-
Consumer loans – FC	-	-	-
Mortgage loans	-	-	-
Automotive loans	-	-	-
General purpose loans	-	-	-
Other	-	-	-
Consumer credit cards – TL	723,887	31,450	755,337
With installments	229,061	31,450	260,511
Without installments	494,826	-	494,826
Consumer credit cards – FC	-	-	-
With installments	-	-	-
Without installments	-	-	-
Personnel loans – TL	2,944	15,639	18,583
Mortgage loans	-	-	-
Automotive loans	-	-	-
General purpose loans	2,944	15,639	18,583
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	9,925	-	9,925
With installments	3,369	-	3,369
Without installments	6,556	-	6,556
Personnel credit cards – FC	-	-	-
With installments	-	-	-
Without installments	-	-	-
Overdraft accounts – TL (real person)	197,647	-	197,647
Overdraft accounts – FC (real person)	-	-	-
Total	1,624,820	8,624,408	10,249,228

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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

	Short term	Medium and long term	Total
Commercial installment loans - TL	478,991	4,686,105	5,165,096
Real estate loans	-	29,233	29,233
Automotive loans	43	110,522	110,565
General purpose loans	-	-	-
Other	478,948	4,546,350	5,025,298
Commercial installment loans – indexed to FC	42	73,598	73,640
Real estate loans	-	-	-
Automotive loans	-	10,360	10,360
General purpose loans	-	-	-
Other	42	63,238	63,280
Commercial installment loans-FC	-	10,970	10,970
Real estate residential loans	-	-	-
Automotive loans	-	-	-
General purpose loans	-	-	-
Other	-	10,970	10,970
Corporate credit cards – TL	47,092	-	47,092
With installments	15,352	-	15,352
Without installments	31,740	-	31,740
Corporate credit cards – FC	-	-	-
With installments	-	-	-
Without installments	-	-	-
Overdraft loans – TL (legal entity)	144,910	-	144,910
Overdraft loans – FC (legal entity)	-	-	-
Total	671,035	4,770,673	5,441,708

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	36,326,700	44,478,592
Foreign loans	143,256	409,214
Total	36,469,956	44,887,806

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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	133,200	141,226
Loans and receivables with doubtful collectability	202,275	164,068
Uncollectible loans and receivables	1,128,260	759,555
Total	1,463,735	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 by the Group

	Group III Loans and receivables with limited collectability	Group IV Loans and receivables with doubtful collectability	Group V Uncollectible loans and receivables
Current period			
Gross amounts before specific provision	894	3,240	6,230
Rescheduled Loans	894	3,240	6,230
Prior period			
Gross amounts before specific provision	222	509	4,720
Rescheduled Loans	222	509	4,720

5.10.2. Information on total non-performing loans

	Group III Loans and receivables with limited collectability	Group IV Loans and receivables with doubtful collectability	Group V Uncollectible loans and receivables
Prior period end balance	702,887	383,292	1,002,611
Additions (+)	1,132,816	17,503	140,808
Transfers from other categories of non-performing loans (+)	-	1,321,068	940,342
Transfers to other categories of non-performing loans (-)	(1,321,068)	(940,342)	-
Collections (-)	(181,767)	(133,537)	(251,301)
Write-offs (-)	(299)	(822)	(8,745)
Sold Portfolio (-)	-	-	-
Corporate and commercial loans	-	-	-
Retail loans	-	-	-
Credit cards	-	-	-
Other	-	-	-
Current period end balance	332,569	647,162	1,823,715
Provisions (-)	(133,200)	(202,275)	(1,128,260)
Net balance on balance sheet	199,369	444,887	695,455

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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	40,042	22,725	63,605
Provision (-)	(29,748)	(8,577)	(26,476)
Net balance on balance sheet	10,294	14,148	37,129
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 receivables with limited collectability	Loans and receivables with doubtful collectability	Uncollectible loans and receivables
Current period (net)			
Loans granted to corporate entities and real person (gross)	332,569	647,162	1,823,715
Provision amount(-)	(133,200)	(202,275)	(1,128,260)
Loans granted to corporate entities and real person (net)	199,369	444,887	695,455
Banks (gross)	-	-	-
Provision amount (-)	-	-	-
Banks (net)	-	-	-
Other loans (gross)	-	-	-
Provision amount (-)	-	-	-
Other loans (net)	-	-	-
Prior period (net)			
Loans granted to corporate entities and real person (gross)	702,887	383,292	1,002,611
Provision amount (-)	(141,226)	(164,068)	(759,555)
Loans granted to corporate entities and real person (net)	561,661	219,224	243,056
Banks (gross)	-	-	-
Provision amount (-)	-	-	-
Banks (net)	-	-	-
Other loans (gross)	-	-	-
Provision amount (-)	-	-	-
Other loans (net)	-	-	-

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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 Loans and receivables with limited collectability	Group IV Loans and receivables with doubtful collectability	Group V Uncollectable loans and receivables
Current period (Net)	11,074	21,153	16,690
Interest accruals and valuation differences	17,528	30,646	26,051
Provision (-)	(6,454)	(9,493)	(9,361)
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 (*)	336,036	386,219
Total	336,036	386,219

(*) It consists of government bonds, which are given as collateral in order for the Parent Bank to be a member of the money markets and to make transactions in such markets such as Interbank, BIST, TurkDEX, Takasbank Money Market.

6.2. Government securities measured at amortised cost

	Current period	Prior period
Government bonds	1,905,013	1,194,996
Treasury bills	-	-
Other government securities	-	-
Total	1,905,013	1,194,996

6.3. Financial assets measured at amortised cost

	Current period	Prior period
Debt securities	1,905,013	1,194,996
Quoted to stock exchange	1,905,013	1,194,996
Not quoted	-	-
Impairment provision (-)	-	-
Total	1,905,013	1,194,996

(Convenience translation of the independent auditors' report and consolidated financial statements originally issued in Turkish, See Note 1.b of section three)

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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	723,851	-
Disposals through sales/redemptions	(56,969)	(142,041)
Provision for impairment (-)	-	-
Change in redemption cost	43,135	20,101
Period end balance	1,905,013	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 September 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	1,190	40,000	22,500	20,765
Profit reserves, capital reserves and prior year profit / loss	-	79,147	109,794	5,684
Profit	23,393	23,273	28,049	5,296
Development cost of operating lease (-)	-	(3)	(3)	-
Intangible assets (-)	-	(515)	(350)	(18)
Total core capital	24,583	141,902	159,990	31,727
Supplementary capital	-	-	-	-
Capital	24,583	141,902	159,990	31,727
Net usable shareholder's equity	24,583	141,902	159,990	31,727

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

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

8.2. Information on consolidated subsidiaries

Title (*)	Address (City / CounTL)	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 September 2019 financial information on consolidated subsidiaries as follows (*):

	Total assets	Shareholders' equity	Total fixed assets	Interest income	Income from marketable securities portfolio	Current period profit/ loss	Prior period profit/loss	Fair value
(1)	7,100,407	56,695	5	244,303	-	23,393	48,653	-
(2)	561,196	142,420	1,769	75,403	-	23,273	20,473	-
(3)	1,082,499	160,343	1,073	51,248	-	28,049	25,870	-
(4)	98,445	31,745	180	5,156	-	5,296	3,519	-

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

(Convenience translation of the independent auditors' report and consolidated financial statements originally issued in Turkish, See Note 1.b of section three)

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I. 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 lease receivables (net)

10.1 Investments made in finance lease as per their maturity

	Current period		Prior period	
	Gross	Net	Gross	Net
Less than 1 year	55,145	53,761	63,387	61,946
1-5 years	837,570	785,082	967,042	901,168
More than 5 years	-	-	166,195	151,493
Total	892,715	838,843	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	892,715	1,196,624
Unearned financial lease income (-)	(53,872)	(82,017)
Cancelled leases (-)	-	-
Net financial lease investment	838,843	1,114,607

11. Information on derivative financial assets held for hedging

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	920,628	380	2,968,911	-
Net investment hedge	-	-	-	-
Total	920,628	380	2,968,911	-

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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 September 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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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	712,011	-	14,757,530	4,048,412	200,518	78,402	73,824	-	19,870,697
Foreign currency deposits	2,672,578	-	6,489,204	3,225,893	171,274	68,656	17,886	-	12,645,491
Residents in Turkey	2,482,682	-	6,414,932	3,117,268	132,206	60,343	16,729	-	12,224,160
Residents abroad	189,896	-	74,272	108,625	39,068	8,313	1,157	-	421,331
Public sector deposits	473,326	-	-	11,485	80	-	-	-	484,891
Commercial deposits	516,520	-	874,232	245,341	3,945	2,988	18,832	-	1,661,858
Other institutions deposits	13,822	-	1,203	12,329	89	232	98	-	27,773
Precious metals deposits	329,484	-	-	-	-	-	-	-	329,484
Interbank deposits	2,037,810	-	-	-	-	-	-	-	2,037,810
Central Bank of Turkey	-	-	-	-	-	-	-	-	-
Domestic banks	4	-	-	-	-	-	-	-	4
Foreign banks	2,037,806	-	-	-	-	-	-	-	2,037,806
Participation banks	-	-	-	-	-	-	-	-	-
Other	-	-	-	-	-	-	-	-	-
Total	6,755,551	-	22,122,169	7,543,460	375,906	150,278	110,640	-	37,058,004

Prior 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	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

Saving deposits	Under the guarantee of saving deposit insurance		Exceeding the limit of saving deposit	
	Current period	Prior period	Current period	Prior period
Saving deposit	14,871,610	12,397,645	4,989,857	5,560,491
Foreign currency saving deposits	4,729,866	2,783,584	5,297,092	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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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 counTL 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	20,913	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	-	-

2. Information on derivative financial liabilities held for trading

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

	Current period		Prior period	
	TL	FC	TL	FC
Forward transactions	-	95,252	-	88,476
Swap transactions	306,049	68,699	652,663	103,201
Future transactions	-	-	-	-
Options	289	1,863	262	3,754
Other	-	-	-	-
Total	306,338	165,814	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	249,008	142,427	120,084	791,740
Funds borrowed from foreign banks, institutions and funds	53,194	12,070,200	347,858	20,107,692
Total	302,202	12,212,627	467,942	20,899,432

(Convenience translation of the independent auditors' report and consolidated financial statements originally issued in Turkish, See Note 1.b of section three)

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

3.2. Maturity analysis of funds borrowed

	Current period		Prior period	
	TL	FC	TL	FC
Short term	248,161	206,357	128,190	1,734,370
Medium and long term	54,041	12,006,270	339,752	19,165,062
Total	302,202	12,212,627	467,942	20,899,432

3.3. Funding indusTL 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	452,410	306,369	-	-
More than 1 year	-	-	-	-
Total	452,410	306,369	-	-

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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	509,928	8,360	258,878	4,528
Net investment hedge	-	-	-	-
Total	509,928	8,360	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	31,966	28,294
Provision for credit card score promotion	2,027	1,833
Other provisions	117,442	187,289
<i>Allowance for expected credit losses (Stage 1 and Stage 2) (*)</i>	<i>42,929</i>	<i>48,330</i>
<i>Other</i>	<i>74,513</i>	<i>138,959</i>
Total	151,435	217,416

(*) Non-cash loan provisions are included.

Amount to TL 67,668 (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.

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

The first instance court decided in favor of the Bank however SDIF is entitled to appeal against the decision. In this case, information was received that the appeal of the SDIF was rejected and the decision was upheld in favor of the Bank. Against this approval decision, the Court of Cassation, the way of correction of the decision is clear. In case the SDIF makes a decision correction, the decision is expected to be finalized in favor of the Bank in the first half of 2020.

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. In addition, 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 off-shore 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 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 September 2019, TL 29,876 (31 December 2018: TL 30,779) of TL 55,512 (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 25,636 (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 6,379.86 (Full TL) at 30 September 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 September 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.

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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 September 2019 amounting to TL 153,201 (31 December 2018: TL 140,774).

9.1.2. Information on taxes payable

	Current period	Prior period
Corporate tax payable	153,201	140,774
Taxation of securities	43,144	42,224
Property tax	1,399	1,250
Banking insurance transaction tax ("BITT")	24,659	38,321
Foreign exchange transaction tax	1,263	-
Value added tax payable	4,407	5,571
Other	10,405	10,569
Total	238,478	238,709

9.1.3. Information on premiums

	Current period	Prior period
Social security premiums-employee	5,097	4,869
Social security premiums-employer	7,452	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	368	352
Unemployment insurance-employer	709	678
Other	-	-
Total	13,626	13,027

9.2. Explanations on deferred tax liabilities

As of 30 September 2019, deferred tax asset and deferred tax liability of the Group amounts to TL 6,456 and TL 225,947, 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	
	Accumulated temporary differences	Deferred tax asset / (liability)	Accumulated temporary differences	Deferred tax asset / (liability)
Timing differences constituting the basis for deferred tax				
Provisions (*)	131,016	28,474	213,843	44,555
Fair value differences for financial assets and liabilities	127,453	27,878	(39,562)	(7,820)
Derivative valuation differences	(1,861,926)	(388,408)	(2,828,546)	(595,560)
Expected credit losses of Stage I and II	492,597	108,371	618,520	136,074
Other	28,801	4,194	15,677	3,449
Total deferred tax (liabilities) net		(219,491)		(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 nine-month period ended 30 September 2019 (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		Prior period	
	(1 January – 30 September 2019)		(1 January – 30 September 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		37,416		(273,182)
Deferred tax recognized under equity		162,395		(295,385)
Balance at the end of the period		(219,491)		(821,775)

10. Information on liabilities regarding assets held for sale

As of 30 September 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	-	3,946,929	-	3,813,522
Subordinated loans	-	3,946,929	-	3,813,522
Subordinated debt instruments	-	-	-	-
Total	-	3,946,929	-	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 September 2019.

12. Information on shareholders' equity

12.1. Paid-in capital

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

(*) 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.

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Notes to the consolidated financial statements

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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

	Current period		Prior period	
	TL	FC	TL	FC
From associates, subsidiaries, and entities under common control	-	-	-	-
Valuation difference	59,549	-	(13,421)	-
Foreign exchange difference	-	-	-	-
Total	59,549	-	(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)

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Notes to the consolidated financial statements

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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	1,784,856	1,299,103
Forward deposit purchase and sales commitments	-	-
Loan granting commitments	2,615,255	1,823,151
Commitments for cheque payments	302,481	352,249
Commitments for credit card limits	1,348,747	1,553,684
Commitments for credit cards and banking services promotions	5,375	5,479
Other irrevocable commitments	26,046	24,162
Total	6,082,760	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	986,404	1,764,338
Commitments and contingencies	556,760	473,848
Bank acceptance loans	5,588	39,370
Total	1,548,752	2,277,556

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

	Current period	Prior period
Irrevocable letters of guarantees	5,166,892	5,552,334
Cash loans letters of guarantees	794,428	354,480
Advance letters of guarantees	765,020	569,482
Temporary letters of guarantees	57,098	54,865
Other	87,902	78,752
Total	6,871,340	6,609,913

1.3. Explanation on non-cash loans

1.3.1. Total amount of non-cash loans

	Current period	Prior period
Non-cash loans given against cash loans	1,015,922	602,360
With original maturity of 1 year or less than 1 year	233,279	97,091
With original maturity of more than 1 year	782,643	505,269
Other non-cash loans	7,404,170	8,285,109
Total	8,420,092	8,887,469

(Convenience translation of the independent auditors' report and consolidated financial statements originally issued in Turkish, See Note 1.b of section three)

ING Bank A.Ş. and its Financial Subsidiaries

**Notes to the consolidated financial statements
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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.

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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 (*)	3,763,627	610,758	4,038,681	552,329
Short term loans	1,176,693	74,606	1,543,360	46,013
Medium and long term loans	2,422,148	536,152	2,428,404	506,316
Interest on loans under follow-up	164,786	-	66,917	-
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	42,347	6,153	35,309	2,382
From foreign banks	317	36,260	9,322	11,186
From branches abroad	-	-	-	-
Total	42,664	42,413	44,631	13,568

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	17,609	416	30,741	698
Financial assets measured at fair value through other comprehensive income	99,771	-	47,452	-
Financial assets measured at amortised cost	182,152	-	111,472	-
Total	299,532	416	189,665	698

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
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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		Prior period	
	TL	FC	TL	FC
Banks (*)	53,250	328,536	104,001	387,657
Central Bank of Turkey	-	-	-	-
Domestic banks	20,688	3,478	12,314	4,687
Foreign banks	32,562	325,058	91,687	382,970
Branches and offices abroad	-	-	-	-
Other institutions (*)	-	3,729	-	6,566
Total	53,250	332,265	104,001	394,223

(*) 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

	Current period		Prior period	
	TL	FC	TL	FC
Interest on securities issued	-	-	17,721	-

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

Account name	Demand deposit	Time deposit					Accumulated deposits	Total
		Up to 1 month	Up to 3 months	Up to 6 months	Up to 1 year	More than 1 year		
Turkish lira								
Bank deposits	-	801	-	-	-	-	-	801
Saving deposits	-	1,885,440	516,130	36,633	17,963	15,047	-	2,471,213
Public sector deposits	-	-	1,919	100	-	-	-	2,019
Commercial deposits	-	101,856	43,263	1,609	1,237	3,926	-	151,891
Other deposits	-	161	1,458	13	13	23	-	1,668
7 days call accounts	-	-	-	-	-	-	-	-
Total	-	1,988,258	562,770	38,355	19,213	18,996	-	2,627,592
Foreign currency								
Foreign currency deposits	-	78,045	53,771	2,219	1,737	1,190	-	136,962
Banks deposits	-	13,249	-	-	-	-	-	13,249
7 days call accounts	-	-	-	-	-	-	-	-
Precious metal deposits	-	-	-	-	-	-	-	-
Total	-	91,294	53,771	2,219	1,737	1,190	-	150,211
Grand total	-	2,079,552	616,541	40,574	20,950	20,186	-	2,777,803

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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	21,420,731	38,951,939
Gains on capital market transactions	57,840	27,320
Gains on derivative financial instruments	11,255,832	19,504,451
Foreign exchange gains	10,107,059	19,420,168
Loss (-)	(20,854,230)	(39,158,095)
Loss on capital market transactions	(59,419)	(64,551)
Loss on derivative financial instruments	(10,388,359)	(14,562,955)
Foreign exchange loss	(10,406,452)	(24,530,589)

Net loss on derivative financial instruments recognized in profit/loss resulting from fluctuations in foreign exchange rates is TL 145,685 (30 September 2018: TL 3,302,481 net profit).

5. Information on other operating income

	Current period	Prior period
Income from reversal of prior years' provisions	364,241	541,248
Income arising from sale of assets	10,032	13,856
Banking services income	2,309	3,730
Other non-interest income	55,352	46,576
Total	431,934	605,410

6. Provision expenses for loan losses and other receivables

Allowance for expected credit losses:

	Current period	Prior period
Expected credit losses	787,386	921,492
12-Month expected credit loss (Stage 1)	54,710	104,910
Expected credit loss significant increase in credit risk (Stage 2)	3,100	220,792
Expected credit loss impaired credits (Stage 3)	729,576	595,790
Impairment losses on securities	575	406
Financial assets measured at fair value through profit/loss	575	406
Financial assets measured at fair value through other comprehensive income	-	-
Impairment losses on associates, subsidiaries and joint-ventures	-	-
Associates	-	-
Subsidiaries	-	-
Joint ventures	-	-
Other	-	-
Total	787,961	921,898

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

7. Information on other operating expenses

	Current period	Prior period
Reserves for employee termination benefits	2,345	1,397
Bank social aid fund deficit provision	-	-
Tangible assets impairment expense	3,500	-
Depreciation expense of tangible assets	97,858	41,540
Intangible assets impairment expense	-	-
Goodwill impairment expense	-	-
Amortisation expense of intangible assets	22,395	17,191
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	542,295	573,060
Operating lease expenses related with IFRS 16 exception (*)	11,548	88,176
Repair and maintenance expenses	26,011	22,697
Advertisement expenses	77,374	60,203
Other expenses	427,362	401,984
Loss on sales of assets	17,753	514
Other	205,683	171,614
Total	891,829	805,316

(*) Amount stated in prior period column 30 September 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 September 2019, the corporate tax provision expense for the period is TL 396,103 (31 September 2018: TL 14,575), and the deferred tax income is TL 37,416 (30 September 2018: TL 273,182 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 5,754,121 (30 September 2018: TL 5,164,363), while the interest expense is TL 3,207,248 (30 September 2018: TL 2,437,370).

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 411,529 (30 September 2018: TL 418,684) has included TL 157,274 (30 September 2018: TL 121,413) resulting from the credit card fees and commissions, TL 76,323 (30 September 2018: TL 98,782) resulting from service fees and commissions from contracted merchants and TL 96,701 (30 September 2018: TL 89,388) resulting from insurance commissions.

Other fees and commissions paid amounting to TL 149,835 (30 September 2018: TL 164,188) has included TL 91,905 (30 September 2018: TL 117,113) resulting from credit card exchange commissions.

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements

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(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	Subsidiaries, associates and joint ventures (partnerships)		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	-	-	142	546,004	60	192,488
Interest and commission income	-	-	3	938	-	207

1.2. Prior period

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	
	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	465	-	257

1.3. Information on deposit balances of 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
	Deposit					
Beginning of the period	-	-	25,152	8,426	2,400	3,070
End of the period	-	-	107,234	25,152	67,394	2,400
Interest expense on deposits	-	-	452	419	559	201

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, 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
	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	-	-	18,265,132	11,502,875	-	20,039
Total profit/loss	-	-	63,722	(131,610)	45,991	94,762
Transactions with hedging purposes						
Beginning of the period	-	-	-	-	-	-
End of period	-	-	1,262,815	-	-	-
Total profit/loss	-	-	(33,346)	-	-	-

(Convenience translation of the independent auditors' report and consolidated financial statements originally issued in Turkish, See Note 1.b of section three)

ING Bank A.Ş. and its Financial Subsidiaries

Notes to the consolidated financial statements
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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	-	-	13,735	63,731	67,664	90,087
End of period	-	-	22,192	13,735	24,111	67,664
Interest income received	-	-	560	9,864	123	170

1.6. Information on loans borrowed from 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
Loans						
Beginning of the period	-	-	14,502,679	15,505,498	7,702	8,403
End of period	-	-	9,218,999	14,502,679	5,101	7,702
Interest and commission paid	-	-	118,386	207,009	1,308	541

The Group also has subordinated loan amounting to TL 3,946,929 from its shareholder ING Bank NV as of 30 September 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 nine-month period ended as of 30 September 2019 is amounting to TL 31,053 (30 September 2018: TL 25,528).

VI. Explanations and notes related to subsequent events

In line with the Article 25, 2nd and 3rd clauses of Banking Law, Meltem Öztürk has been appointed as the Human Resources Executive Vice President of Human Resources of the Bank per the Board of Directors resolution No. 58/1 dated 1 October 2019 and she started her duty as of 30 October 2019.

(Convenience translation of the independent auditors' report and consolidated financial statements originally issued in Turkish, See Note 1.b of section three)

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**Notes to the consolidated financial statements
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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 September 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 1 November 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.

(Convenience translation of the consolidated interim financial statements and related disclosures and footnotes originally issued in Turkish, See Note 1.b of section three)

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Notes to the consolidated financial statements
as of and for the nine-month period ended 30 September 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 September 2019 and 31 December 2018 is as follows.

Main balance sheet items

Million TL	Current period	Prior period
Net loans	38,666	47,220
Deposits	37,058	32,277
Equity	8,375	7,658
Total assets	64,874	68,412

Main financial ratios

	Current period	Prior period
Capital adequacy ratio	25.43%	21.11%
Loans / Total assets	59.60%	69.02%
Deposits / Total assets	57.12%	47.18%
Non-performing loans / Total loans	7.14%	4.28%
Income / Average capital (*)	21.70%	18.41%
Income / Average assets (*)	2.61%	1.87%
Expense / Income ratio (**)	39.46%	43.03%

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

(**) Prior period profit/loss amounts are for the nine-month period ended 30 September 2018.

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.

(Convenience translation of the consolidated interim financial statements and related disclosures and footnotes originally issued in Turkish, See Note 1.b of section three)

ING Bank A.Ş.

**Notes to the consolidated financial statements
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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

The United States and China failed to reach an agreement on trade and market access while the divisions around Brexit within the United Kingdom continued throughout the third quarter. Accordingly, concerns that the ongoing tensions in global trade relations could damage confidence, increase costs, cripple supply chains and reduce investment appetite made a considerable impact on the course of global financial markets. As a result of these developments, weakness in the US manufacturing sector and in the global economy as a whole made itself increasingly felt in other industries as well while the US Federal Reserve (Fed) signaled that it would keep a close eye on the economic outlook and take the necessary steps and made two 25-base point interest cuts in its July and September meetings. In the meantime, the Eurozone saw weakening economic outlook while risks such as Brexit and trade wars that suppress confidence indicators strengthened the likelihood of greater loss of momentum in growth. This, in turn, led to the perception that the European Central Bank would maintain for a long time the accommodative monetary policy stance it had strengthened in September.

On the domestic front, with the help of disinflation that outperformed projections as well as the changing policy stance of global central banks, interest rate cut decisions were taken in July and September. Supported by declining interest rates, the Turkish economy, which shrunk less than expected in the second quarter of the year, will continue its positive performance moving forward.

During this period, with its belief in the national economy, ING Turkey continued its investments particularly in technology and digitalization and to develop products and services in parallel with its next generation banking approach. ING Turkey will continue to develop innovative products and services and to invest with confidence in Turkey. I thank all our stakeholders, and particularly our business partners, customers, employees, and main shareholder for their support and contributions.

John T. Mc Carthy

Board Chairman

(Convenience translation of the consolidated interim financial statements and related disclosures and footnotes originally issued in Turkish, See Note 1.b of section three)

ING Bank A.Ş.

**Notes to the consolidated financial statements
as of and for the nine-month period ended 30 September 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, which operates in line with its goal of keeping its employees and customers always a step ahead in their professional and private lives, we continue to invest in a perfect customer experience. We transform the new opportunities afforded by mobile banking thanks to advancing technologies into applications that made a difference for customers such as the “Location Based Cost-free ATM”. We took an exemplary step on the path to sustainability with the solar energy plant investment we launched on the roof of our Kahramanmaraş Operations and Call Center while our investments to strengthen social gender equality continue with the ING Equal Future Fund we launched in collaboration with the Turkish Education Foundation (TEV).

Our Bank put on a stellar performance in the first nine-month of 2019. Based on our consolidated financial data, as of 30 September 2019, our total assets were TL 64.9 billion, shareholder’s equity was TL 8.4 billion and earnings before tax were TL 1,684 million. Our capital adequacy ratio reached 25.43%. As of 30 September 2019, our Bank provided a total of TL 47.1 billion in loan support including TL 38.7 billion in cash credit while our deposit volume reached TL 37.1 billion.

At ING Turkey, in line with our belief in our counTL’s sustainable development, we will continue together with our customers and Turkey moving forward. On behalf of myself and 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 nine-month of the year.

Pınar Abay

CEO

(Convenience translation of the consolidated interim financial statements and related disclosures and footnotes originally issued in Turkish, See Note 1.b of section three)

ING Bank A.Ş.

**Notes to the consolidated financial statements
as of and for the nine-month period ended 30 September 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 3,941 employees and 220 domestic branches, as of 30 September 2019.

Sector information on September 2019 has not been published yet. According to the sector information disclosed as of June 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 September 2019, the asset size of the Group is TL 64.9 billion, and profit before tax is TL 1,684 million. As of 30 September 2019, credits constitute 60% of total assets with TL 38.7 billion.

According to consolidated financial statements, deposits which is the primary funding source of the Group, constitutes 57% of the balance sheet with TL 37.1 billion as of 30 September 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 September 2019, consolidated capital adequacy ratio of the Group has reached 25.43%. In addition, the Parent Bank has received subordinated loans from its main shareholder amounting to TL 3.9 billion. As of 30 September 2019, total equities of the Group has reached to TL 8.4 billion.

(Convenience translation of the consolidated interim financial statements and related disclosures and footnotes originally issued in Turkish, See Note 1.b of section three)

ING Bank A.Ş.

**Notes to the consolidated financial statements
as of and for the nine-month period ended 30 September 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