# Türk Telekomünikasyon Anonim Şirketi and Its Subsidiaries

31 December 2021

Consolidated Financial Statements

And Independent Auditor's Report

15 February 2022

*This report contains 7 pages of "Independent Auditor's Report" and 112 pages of financial statements and explanatory notes.*

**(Convenience translation of a report and financial statements originally issued in Turkish)**



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*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

| | | Current period | Prior period |
|---|---|---|---|
| | | Audited | Audited |
| | *Notes* | 31 December 2021 | 31 December 2020 |
| **Assets** | | | |
| **Total current assets** | | **20.779.381** | **13.289.465** |
| Cash and cash equivalents | *4* | 7.696.870 | 5.007.927 |
| Trade receivables | | | |
| *- Trade receivables due from related parties* | *8* | 53.869 | 15.334 |
| *- Trade receivables due from unrelated parties* | *6, 2.5* | 6.528.628 | 5.284.678 |
| Other receivables | | | |
| *- Other receivables due from unrelated parties* | *9* | 112.921 | 68.396 |
| Contract assets | | | |
| *- Contract assets from sale of goods and service contracts* | *6, 2.5* | 951.675 | 902.616 |
| Derivative financial assets | | | |
| *- Derivative financial assets held for trading* | *15* | 728.427 | 958 |
| *- Derivative financial assets held for hedging* | *15* | 3.270.656 | 1.206.509 |
| Inventories | *10* | 439.933 | 248.966 |
| Prepayments | | | |
| *- Prepayments to unrelated parties* | *13* | 382.907 | 199.469 |
| Current tax assets | | 8.949 | 63.684 |
| Other current assets | | | |
| *- Other current assets due from unrelated parties* | *12* | 548.128 | 253.567 |
| **Sub total** | | **20.722.963** | **13.252.104** |
| Non-current assets classified as held for sale | *17* | 56.418 | 37.361 |
| **Total non-current assets** | | **37.558.254** | **31.433.055** |
| Financial investments | | | |
| *- Other financial investments* | *14* | 13.671 | 17.956 |
| Trade receivables | | | |
| *- Trade receivables due from unrelated parties* | *6, 2.5* | 127.851 | 204.132 |
| Other receivables | | | |
| *- Other receivables due from unrelated parties* | *9* | 38.739 | 32.825 |
| Contract assets | | | |
| *- Contract assets from sale of goods and service contracts* | *6, 2.5* | 55.377 | 77.310 |
| Derivative financial assets | | | |
| *- Derivative financial assets held for trading* | *15* | 39.980 | 32.710 |
| Right of use assets | *7* | 1.578.893 | 1.546.155 |
| Investment property | *18* | 15.483 | 17.612 |
| Property, plant and equipment | | | |
| *- Land and premises* | *19* | 6.398.268 | 5.894.276 |
| *- Buildings* | *19* | 592.875 | 574.312 |
| *- Machinery and equipments* | *19* | 10.862.961 | 9.201.422 |
| *- Other property, plant and equipment* | *19* | 1.119.642 | 394.901 |
| Intangible assets | | | |
| *- Goodwill* | *16* | 44.944 | 44.944 |
| *- Rights regarding concession agreements* | *20* | 5.426.301 | 4.220.070 |
| *- Concession agreements assets* | *20* | 1.315.334 | 887.366 |
| *- Licences* | *20* | 2.104.880 | 2.404.054 |
| *- Other intangible assets* | *20* | 5.440.553 | 4.581.021 |
| Prepayments | | | |
| *- Prepayments to unrelated parties* | *13* | 19.998 | 13.372 |
| Deferred tax asset | *11* | 2.362.407 | 1.288.525 |
| Other non-current assets | | | |
| *- Other non-current assets due from unrelated parties* | | 97 | 92 |
| **Total assets** | | **58.337.635** | **44.722.520** |

**TÜRK TELEKOMÜNİKASYON ANONİM ŞİRKETİ AND ITS SUBSIDIARIES**
**CONSOLIDATED STATEMENT OF FINANCIAL POSITION AS AT 31 DECEMBER 2021**
*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

| | | **Current period** | **Prior period** |
|---|---|---|---|
| | | **Audited** | **Audited** |
| | ***Notes*** | **31 December 2021** | **31 December 2020** |
| **Liabilities** | | | |
| **Total current liabilities** | | **17.997.064** | **14.228.270** |
| Financial liabilities | | | |
| Financial liabilities from related parties | | | |
| *- Bank loans* | *5, 8* | – | 869.753 |
| Financial liabilities from unrelated parties | | | |
| *- Bank loans* | *5* | 802.166 | 1.913.477 |
| *- Lease liabilities* | *5* | 33.092 | 18.809 |
| Current portion of long term financial liabilities | | | |
| Current portion of long term financial liabilities from unrelated parties | | | |
| *- Bank loans* | *5* | 5.374.362 | 2.801.972 |
| *- Lease liabilities* | *5* | 556.271 | 413.791 |
| *- Issued debt instruments* | *5* | 351.387 | 97.808 |
| Trade payables | | | |
| *- Trade payables to unrelated parties* | *6* | 7.729.147 | 5.293.521 |
| Employee benefit obligations | *12* | 215.114 | 199.768 |
| Other payables | | | |
| *- Other payables to unrelated parties* | *9* | 1.395.728 | 993.710 |
| Derivative financial liabilities | | | |
| *- Derivative financial liabilities held for trading* | *15* | 114.611 | 320.186 |
| *- Derivative financial liabilities held for hedging* | *15* | 159 | 47.533 |
| Contract liabilities | | | |
| *- Contract liabilities from sale of goods and service contracts* | *13, 2.5* | 713.389 | 623.339 |
| Current tax liabilities | *33* | 160.514 | 172.456 |
| Current provisions | | | |
| *- Current provisions for employee benefits* | *21* | 319.140 | 276.460 |
| *- Other current provisions* | *21* | 210.495 | 166.944 |
| Other current liabilities | | | |
| *- Other current liabilities to unrelated parties* | *12, 2.5* | 21.489 | 18.743 |
| **Total non-current liabilities** | | **26.090.667** | **18.456.874** |
| Long term financial liabilities | | | |
| Long term financial liabilities from unrelated parties | | | |
| *- Bank loans* | *5* | 8.926.851 | 6.775.327 |
| *- Lease liabilities* | *5* | 850.097 | 905.086 |
| *- Issued debt instruments* | *5* | 12.909.151 | 7.438.569 |
| Other payables | | | |
| *- Other payables to unrelated parties* | *9* | 40.299 | 43.656 |
| Derivative financial liabilities | | | |
| *- Derivative financial liabilities held for hedging* | *15* | 351.986 | 347.286 |
| Contract liabilities | | | |
| *- Contract liabilities from sale of goods and service contracts* | *13, 2.5* | 1.417.662 | 1.008.522 |
| Non-current provisions | | | |
| *- Non-current provisions for employee benefits* | *21* | 1.281.014 | 1.214.789 |
| *- Other non-current provisions* | *21* | 10.627 | 8.506 |
| Deferred tax liabilities | *11* | 302.980 | 715.133 |
| **Total liabilities** | | **44.087.731** | **32.685.144** |

**TÜRK TELEKOMÜNİKASYON ANONİM ŞİRKETİ AND ITS SUBSIDIARIES**
**CONSOLIDATED STATEMENT OF FINANCIAL POSITION AS AT 31 DECEMBER 2021**
*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

| | | Current period | Prior period |
|---|---|---|---|
| | | **Audited** | **Audited** |
| | ***Notes*** | **31 December 2021** | **31 December 2020** |
| **Equity** | | **14.249.904** | **12.037.376** |
| Equity attributable to owners of parent | | | |
| Issued capital | *22* | 3.500.000 | 3.500.000 |
| Inflation adjustments on capital | *22* | (239.752) | (239.752) |
| Other accumulated comprehensive income / (loss) that will not be reclassified in profit or loss | | | |
| Gains / (losses) from investments in equity instruments | *22* | (11.840) | – |
| Gains / (losses) on revaluation and remeasurement | | | |
| - *Losses on remeasurements of defined benefit plans* | *22* | (911.454) | (782.420) |
| - *Increases on revaluation of property, plant and equipment* | *22* | 5.231.590 | 4.766.342 |
| Losses due to change in fair value of financial liability attributable to change in credit risk of liability | *22* | 76.534 | (88.747) |
| Effect of business combinations under common control | *22* | (1.320.942) | (1.320.942) |
| Other accumulated comprehensive income / (loss) that will be reclassified in profit or loss | | | |
| Losses on hedge | | | |
| - *Losses on cash flow hedges* | *22* | 876.407 | (320.668) |
| - *Losses on hedges of net investment in foreign operations* | *22* | (1.157.022) | (593.149) |
| Change in value of time value of options | *22* | (4.074.549) | (717.854) |
| Exchange differences on translation | *22* | 1.555.755 | 721.066 |
| Restricted reserves appropriated from profits | | 2.568.388 | 2.398.634 |
| Retained earnings | | 2.395.335 | 1.536.993 |
| Profit for the year | | 5.761.454 | 3.177.873 |
| **Total liabilities and equity** | | **58.337.635** | **44.722.520** |

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

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

| | *Notes* | **Current Period Audited 1 January - 31 December 2021** | **Prior Period Audited 1 January - 31 December 2020** |
|---|---|---|---|
| Revenue | *3, 27* | 34.272.934 | 28.288.875 |
| Cost of sales (-) | *28, 2.5* | (19.404.441) | (15.705.138) |
| **Gross profit** | | **14.868.493** | **12.583.737** |
| General administrative expenses (-) | *28* | (2.735.464) | (2.320.713) |
| Marketing, sales and distribution expenses (-) | *28, 2.5* | (2.644.196) | (2.439.609) |
| Research and development expenses (-) | *28* | (273.817) | (247.105) |
| Other operating income | *30* | 602.899 | 478.566 |
| Other operating expense (-) | *30* | (1.706.903) | (591.362) |
| **Operating profit** | | **8.111.012** | **7.463.514** |
| Impairment gains / losses and reversals of impairment losses determined in accordance with IFRS 9, net | | (186.174) | (278.652) |
| Investment activity income | *31* | 1.143.333 | 377.848 |
| Investment activity expenses (-) | *31* | (16.785) | − |
| **Profit before financing expense** | | **9.051.386** | **7.562.710** |
| Finance income | *32* | 5.015.420 | 998.337 |
| Finance costs (-) | *32* | (8.445.964) | (4.759.106) |
| **Profit from continuing operations, before tax** | *3* | **5.620.842** | **3.801.941** |
| **Tax (expense) / income, continuing operations** | | | |
| - Current period tax expense | *33* | (617.550) | (373.748) |
| - Deferred tax (expense) / income | *11, 33* | 758.162 | (250.320) |
| **Profit for the year** | | **5.761.454** | **3.177.873** |
| Earnings per shares attributable to equity holders of the parent from (in full Kuruş) | *22* | **1,6461** | **0,9080** |
| Earnings per diluted shares attributable to equity holders of the parent from (in full Kuruş) | *22* | **1, 6461** | **0,9080** |

**CONSOLIDATED STATEMENT OF OTHER COMPREHENSIVE INCOME**
**FOR THE YEAR ENDED 31 DECEMBER 2021**

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

| | Notes | Current Period Audited 1 January - 31 December 2021 | Prior Period Audited 1 January - 31 December 2020 |
|---|---|---|---|
| **Profit for the period** | | **5.761.454** | **3.177.873** |
| **Other comprehensive income** | | | |
| **Other comprehensive income that will not be reclassified to profit or loss** | | **489.655** | **235.972** |
| Gains / (losses) from investments in equity instruments | *22* | (11.840) | – |
| Gain from revaluation of property, plant and equipments, net | *19* | 518.828 | 460.035 |
| Losses on remeasurements of defined benefit plans | *21* | (160.582) | (111.790) |
| Change in fair value of financial liability attributable to change in credit risk of liability | | 206.601 | (110.829) |
| Tax effect of other comprehensive income items not to be reclassified to profit or loss | | | |
| *-Taxes relating to remeasurements of defined benefit plans* | | *31.548* | *21.980* |
| *-Tax effect of revaluation of property, plant and equipment* | | *(53.580)* | *(45.590)* |
| *-Taxes relating to change in fair value of financial liability attributable to change in credit risk of liability* | | *(41.320)* | *22.166* |
| **Other comprehensive income that will be reclassified to profit or loss** | | **(2.166.046)** | **(217.672)** |
| Exchange differences on translation | | 834.689 | 249.684 |
| Gains / (losses) on cash flow hedges | | 1.163.766 | 147.745 |
| Gains / (losses) on hedges of net investments in foreign operations | | (704.841) | (236.940) |
| Gains / (losses) on change in value of time value of options | | (4.195.869) | (495.000) |
| Tax effect on other comprehensive income items to be reclassified to profit or loss | | | |
| *-Taxes relating to cash flow hedges* | | *(243.933)* | *(29.549)* |
| *-Taxes relating to (gains) / losses on hedges of net investments in foreign operations* | | *140.968* | *47.388* |
| *-Taxes relating to change in value of time value of options of other comprehensive (loss) / income* | | *839.174* | *99.000* |
| **Other comprehensive (loss) / income** | | **(1.676.391)** | **18.300** |
| **Total comprehensive income** | | **4.085.063** | **3.196.173** |

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

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

| | | | | Other accumulated comprehensive income / (loss) that will not be reclassified in profit or loss | | | | | Other accumulated comprehensive income / (loss) that will be reclassified in profit or loss | | | | | Retained earnings / (losses) | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | Gains / (losses) on revaluation and remeasurement | | | Gains / (losses) on hedge | | | | | | | |
| | Issued capital | Inflation adjustments on capital | Share based payments | Effect of business combinations under common control | Gains / (losses) from investments in equity instruments | Increases on revaluation of property, plant and equipment | Gains / (losses) on remeasurements of defined benefit plans | Gains / (losses) due to change in fair value of financial liability attributable to change in credit risk of liability | Gains / (losses) on hedges of net investment in foreign operations | Gains / (losses) on cash flow hedges | Change in value of time value of options | Exchange differences on translation | Restricted reserves appropriated from profits | Retained earnings | Profit for the year | Total equity |
| **Balance at 1 January 2020** | **3.500.000** | **(239.752)** | **9.528** | **(1.320.942)** | **–** | **4.351.897** | **(692.610)** | **(132.819)** | **(403.597)** | **(438.864)** | **(321.854)** | **471.382** | **2.355.969** | **(102.268)** | **2.406.783** | **9.442.853** |
| Transfers | – | – | – | – | – | – | – | – | – | – | – | – | 42.665 | 2.364.118 | (2.406.783) | – |
| Total comprehensive income | – | – | – | – | – | 414.445 | (89.810) | (88.663) | (189.552) | 118.196 | (396.000) | 249.684 | – | – | 3.177.873 | 3.196.173 |
| *Profit for period* | – | – | – | – | – | – | – | – | – | – | – | – | – | – | *3.177.873* | *3.177.873* |
| *Other comprehensive income* | – | – | – | – | – | *414.445* | *(89.810)* | *(88.663)* | *(189.552)* | *118.196* | *(396.000)* | *249.684* | – | – | – | *18.300* |
| Dividends paid (Note 22) | – | – | – | – | – | – | – | – | – | – | – | – | – | (601.650) | – | (601.650) |
| Transfer of gains / (losses) due to change in fair value of financial liability attributable to change in credit risk of liability fund to accumulated comprehensive income | – | – | – | – | – | – | – | 132.735 | – | – | – | – | – | (132.735) | – | – |
| Transfer of share based payments reserve to accumulated comprehensive income | – | – | (9.528) | – | – | – | – | – | – | – | – | – | – | 9.528 | – | – |
| **Balance at 31 December 2020** | **3.500.000** | **(239.752)** | **–** | **(1.320.942)** | **–** | **4.766.342** | **(782.420)** | **(88.747)** | **(593.149)** | **(320.668)** | **(717.854)** | **721.066** | **2.398.634** | **1.536.993** | **3.177.873** | **12.037.376** |
| **Balance at 1 January 2021** | **3.500.000** | **(239.752)** | **–** | **(1.320.942)** | **–** | **4.766.342** | **(782.420)** | **(88.747)** | **(593.149)** | **(320.668)** | **(717.854)** | **721.066** | **2.398.634** | **1.536.993** | **3.177.873** | **12.037.376** |
| Transfers | – | – | – | – | – | – | – | – | – | – | – | – | 169.754 | 1.135.584 | (1.305.338) | – |
| Total comprehensive income | – | – | – | – | (11.840) | 465.248 | (129.034) | 165.281 | (563.873) | 919.833 | (3.356.695) | 834.689 | – | – | *5.761.454* | 4.085.063 |
| *Profit for period* | – | – | – | – | – | – | – | – | – | – | – | – | – | – | *5.761.454* | *5.761.454* |
| *Other comprehensive income* | – | – | – | – | *(11.840)* | *465.248* | *(129.034)* | *165.281* | *(563.873)* | *919.833* | *(3.356.695)* | *834.689* | – | – | – | *(1.676.391)* |
| Dividends paid (Note 22) | – | – | – | – | – | – | – | – | – | – | – | – | – | – | *(1.872.535)* | (1.872.535) |
| Other adjustments (Note 22) | – | – | – | – | – | – | – | – | – | 277.242 | – | – | – | (277.242) | – | – |
| **Balance at 31 December 2021** | **3.500.000** | **(239.752)** | **–** | **(1.320.942)** | **(11.840)** | **5.231.590** | **(911.454)** | **76.534** | **(1.157.022)** | **876.407** | **(4.074.549)** | **1.555.755** | **2.568.388** | **2.395.335** | **5.761.454** | **14.249.904** |

**TÜRK TELEKOMÜNİKASYON ANONİM ŞİRKETİ AND ITS SUBSIDIARIES**

**CONSOLIDATED STATEMENT OF CASH FLOWS FOR THE YEAR ENDED 31 DECEMBER 2021**

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

| | | Current Period | Prior Period |
|---|---|---|---|
| | | Audited | Audited |
| | *Notes* | 1 January - 31 December 2021 | 1 January - 31 December 2020 |
| **Net profit for the period** | | 5.761.454 | 3.177.873 |
| **Adjustments to reconcile profit:** | | | |
| Adjustments for depreciation and amortization expense | *29* | 6.169.325 | 5.318.992 |
| Adjustments for impairment loss / (reversal of impairment loss) | | | |
| *- Adjustments for impairment loss of receivables* | | *176.332* | *269.577* |
| *- Adjustments for impairment loss of inventories* | | *1.184* | *7.316* |
| *- Adjustments for impairment loss of property, plant and equipment* | *29* | *32.882* | *56.292* |
| *- Other adjustments for impairment loss (reversal of impairment loss)* | | *9.842* | *9.075* |
| Adjustments for provisions | | | |
| *- Adjustments for (reversal of) provisions related with employee benefits* | *21* | *626.958* | *480.329* |
| *- Adjustments for (reversal of) lawsuit and/or penalty provisions* | *21* | *192.014* | *57.923* |
| *- Adjustments for (reversal of) other provisions* | *21* | *2.121* | *177* |
| Adjustments for interest expenses and income | | | |
| *- Adjustments for interest income* | | *(315.914)* | *(251.869)* |
| *- Adjustments for interest expense* | | *2.173.688* | *2.301.261* |
| *- Deferred financial expenses from credit purchases* | | *(23.083)* | *72.353* |
| Adjustments for unrealised foreign exchange losses | | 2.701.224 | 2.039.315 |
| Adjustments for fair value losses / (gains) | | | |
| *- Adjustments for fair value (gains) / losses on derivative financial instruments* | | *363.172* | *141.001* |
| *- Adjustments for fair value losses / (gains) of issued financial instruments* | | *(3.332)* | *(399)* |
| Adjustments for tax expense / (income) | *33* | (140.612) | 624.068 |
| Adjustments for losses / (gains) on disposal of non-current asset | | | |
| *- Adjustments for gains arises from sale of tangible assets* | *31* | *(1.126.548)* | *(377.848)* |
| Other adjustments for which cash effects are investing or financing cash flow | | 111.783 | 81.056 |
| Other adjustments for non-cash items | *25* | (295.807) | (212.258) |
| **Operating profit before working capital changes** | | **16.416.683** | **13.794.234** |
| **Changes in working capital:** | | | |
| Adjustments for (increase) / decrease in trade receivables | | | |
| *- (Increase) / decrease in trade receivables from related parties* | | *(38.535)* | *(3.541)* |
| *- (Increase) / decrease in trade receivables from unrelated parties* | | *(1.242.631)* | *(772.902)* |
| Adjustments for (increase) / decrease in inventories | | (192.151) | (4.240) |
| Adjustments for increase / (decrease) in trade payable | | | |
| *- Increase / (decrease) in trade payables to related parties* | | *–* | *(87)* |
| *- Increase / (decrease) in trade payables to unrelated parties* | | *2.163.438* | *1.028.656* |
| Adjustments for (increase) / decrease in other receivables related with operations | | | |
| *- (Increase) / decrease in other unrelated party receivables related with operations* | | *(450.266)* | *76.642* |
| Adjustments for increase / (decrease) in other operating payables related with operations | | | |
| *- Increase / (decrease) in other payables related with operations to unrelated parties* | | *319.729* | *238.220* |
| **Cash flow from operations:** | | | |
| Interest received | | 194.153 | 124.903 |
| Payments related with provisions for employee benefits | *21* | (700.804) | (380.203) |
| Payments related with other provisions | *21* | (158.434) | (128.077) |
| Income taxes paid | | (574.757) | (225.685) |
| Other inflows of cash | *25* | (55.353) | (109.402) |
| **Net cash generated from operating activities** | | **15.681.072** | **13.638.518** |

**CONSOLIDATED STATEMENT OF CASH FLOWS FOR THE YEAR ENDED 31 DECEMBER 2021**

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

| | | **Current Period** | **Prior Period** |
|---|---|---|---|
| | | **Audited** | **Audited** |
| | ***Notes*** | **1 January - 31 December 2021** | **1 January - 31 December 2020** |
| **Cash flows used in investing activities:** | | | |
| Cash outflows arising from capital advance payments to associates and/or joint ventures | *14* | (7.555) | (3.263) |
| Cash outflows from purchase of additional shares of subsidiaries | | – | (205.000) |
| Proceeds from sale of property, plant, equipment and intangible assets | | | |
| *- Proceeds from sales of property, plant and equipment* | | *1.290.068* | *407.862* |
| Purchases of property, plant, equipment and intangible assets | | | |
| *- Purchase of property, plant and equipment* | | *(4.099.756)* | *(3.045.870)* |
| *- Purchase of intangible assets* | | *(4.575.845)* | *(3.916.197)* |
| **Net cash used in investing activities** | | **(7.393.088)** | **(6.762.468)** |
| **Cash flows from financing activities:** | | | |
| Proceed from borrowings | | | |
| *- Proceeds from loans* | | *3.305.686* | *3.248.316* |
| *- Proceeds from issued debt instruments* | | *–* | *150.000* |
| Repayments of borrowings | | | |
| *- Loan repayments* | | *(7.252.780)* | *(7.920.581)* |
| Payments of lease liabilities, net | *25* | (989.577) | (865.728) |
| Cash inflows / (outflows) from derivative instruments, net | *25* | 2.641.504 | 977.277 |
| Dividends paid | *22* | (1.872.535) | (601.650) |
| Interest paid | | (1.974.081) | (2.063.049) |
| Interest received | | 121.761 | 126.966 |
| Other cash outflows, net | *25* | (770.604) | (81.056) |
| **Net cash used in financing activities** | | **(6.790.626)** | **(7.029.505)** |
| NET INCREASE / (DECREASE) IN CASH AND CASH EQUIVALENTS BEFORE CURRENCY TRANSLATION DIFFERENCES | | 1.497.358 | (153.455) |
| IMPACT OF FOREIGN CURRENCY TRANSLATION DIFFERENCES ON CASH AND CASH EQUIVALENTS | | 477.410 | 105.914 |
| CASH AND CASH EQUIVALENTS AT THE BEGINNING OF THE PERIOD | | 4.370.117 | 4.417.658 |
| **CASH AND CASH EQUIVALENTS AT THE END OF THE PERIOD** | ***4*** | **6.344.885** | **4.370.117** |

## 1. REPORTING ENTITY

Türk Telekomünikasyon Anonim Şirketi ("Türk Telekom" or "the Company") is a joint stock company incorporated in Turkey. The Company has its history in the Posthane-i Amirane (Department of Post Office) which was originally established as a Ministry on 23 October 1840. On 4 February 1924, under the Telephone and Telegraph, the authorization to install and operate telephone networks throughout Turkey was given to the General Directorate of Post, Telegraph and Telephone ("PTT"). The Company was founded on 24 April 1995 as a result of the split of the telecommunication and postal services formerly carried out by the PTT. All of the personnel, assets and obligations of the PTT pertaining to telecommunication services were transferred to the Company, the shares of which were fully owned by the Republic of Turkey Ministry of Treasury and Finance ("the Treasury").

On 24 August 2005, Oger Telekomünikasyon A.Ş. ("OTAŞ"), entered into a Share Sale Agreement with the Turkey's Privatization Authority for the purchase of a 55% stake in the Company. A Shareholders Agreement and a Share Pledge Agreement for the block sale of the Company were signed on 14 November 2005 and then after, OTAŞ became the parent company of the Company.

Out of TL 3.500.000 nominal amount of capital, 15% of the Company's shares owned by the Treasury corresponding to a nominal amount of TL 525.000 have been issued to the public through an initial public offering with the permission of Directorate of Istanbul Stock Exchange on 15 May 2008. Since then Company shares are traded in Borsa İstanbul with the name of TTKOM.

As per the regulatory disclosure made by Türk Telekom on 15 August 2018, within the scope of the process, which is carried out in relation to takeover of OTAŞ's 55% shares in our Company, Türk Telekom, by a special purpose vehicle ("SPV"), which the creditor banks of OTAŞ will be shareholders, a notification was made to our company by some of the creditor banks.

Transfer of the Group A shares, which constitutes 55% of the Company's capital, to the afore-mentioned SPV , LYY Telekomünikasyon A.Ş. ("LYY") as of 21 December 2018 has been notified to the Company in accordance with Article 198 of the Turkish Commercial Code. Pursuant to Article 499 of the Turkish Commercial Code, LYY has been registered as a new shareholder in the Company's shareholders' ledger.

As of 31 December 2021, the parent company and controlling party of the Company is LYY Telekomünikasyon A.Ş.

A concession agreement ("the Concession Agreement") was signed by the Company and Turkish Telecommunication Authority (now named the Information and Communication Technologies Authority ("ICTA") as of 14 November 2005. The Concession Agreement covers the provision of all kinds of telecommunication services, establishment of necessary telecommunications facilities and the use of such facilities by other licensed operators and the marketing and supply of telecommunication services for 25 years starting from 28 February 2001. The Concession Agreement will terminate on 28 February 2026 and in the conditions where the Concession Agreement is expired or not renewed, the Company shall transfer all equipment that affects the operation of its systems in full working order and the real estates in its use where these equipment are deployed to the ICTA or to an institution designated by the ICTA.

The Concession Agreement will expire at the end of its time period. However, the Company may apply to the ICTA and request for extension thereof no later than 1 year prior to the expiry of the duration of the Concession Agreement. The ICTA may decide to renew the Concession Agreement at the latest before 180 days of the date of expiration considering new conditions and within the scope of the legislation and the regulations of the ICTA.

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 1. REPORTING ENTITY (CONTINUED)

The details of the Company's subsidiaries as at 31 December 2021 and 31 December 2020 are as follows:

| | | | | Effective ownership of the Company (%) | |
|---|---|---|---|---|---|
| **Name of Subsidiary** | **Place of incorporation and operation** | **Principal activity** | **Functional Currency** | **31 December 2021** | **31 December 2020** |
| TTNet Anonim Şirketi ("TTNet") | Turkey | Internet service provider | Turkish Lira | 100 | 100 |
| TT Mobil İletişim Hizmetleri A.Ş.("TT Mobil") | Turkey | GSM operator | Turkish Lira | 100 | 100 |
| Argela Yazılım ve Bilişim Teknolojileri Sanayi ve Ticaret Anonim Şirketi("Argela") | Turkey | Telecommunication solutions | Turkish Lira | 100 | 100 |
| Innova Bilişim Çözümleri Anonim Şirketi ("Innova") | Turkey | Telecommunication solutions | Turkish Lira | 100 | 100 |
| Assistt Rehberlik ve Müşteri Hizmetleri Anonim Şirketi ("AssisTT") | Turkey | Call center and customer relations | Turkish Lira | 100 | 100 |
| Sebit Eğitim ve Bilgi Teknolojileri A.Ş.("Sebit") | Turkey | Web Based Learning | Turkish Lira | 100 | 100 |
| NETSIA Inc. | USA | Telecommunications solutions | U.S. Dollar | 100 | 100 |
| Sebit LLC | USA | Web based learning | U.S. Dollar | 100 | 100 |
| TT International Holding B.V.("TT International") (*) | Netherlands | Holding company | Euro | 100 | 100 |
| Türk Telekom International AT GmbH ("TTINT Austria")(*) | Austria | Internet/data services, infrastructure and wholesale voice services provider | Euro | 100 | 100 |
| Türk Telekom International Hu Kft (TTINT Hungary)(*) | Hungary | Internet/data services, infrastructure and wholesale voice services provider | Euro | 100 | 100 |
| S.C. Euroweb Romania S.A.("TTINT Romania") (*) | Romania | Internet/data services, infrastructure and wholesale voice services provider | Euro | 100 | 100 |
| Türk Telekom International Bulgaria EODD ("TTINT Bulgaria")(*) | Bulgaria | Internet/data services, infrastructure and wholesale voice services provider | Euro | 100 | 100 |
| Türk Telekom International CZ s.r.o ("TTINT Czech Republic") (*) | Czech Republic | Internet/data services, infrastructure and wholesale voice services provider | Euro | 100 | 100 |
| Türk Telekom International SRB d.o.o ("TTINT Serbia") (*) | Serbia | Internet/data services, infrastructure and wholesale voice services provider | Euro | 100 | 100 |
| TTINT Telekomunikacije d.o.o. ("TTINT Slovenia") (*) | Slovenia | Internet/data services, infrastructure and wholesale voice services provider | Euro | 100 | 100 |
| Türk Telekom International SK s.r.o ("TTINT Slovakia") (*) | Slovakia | Internet/data services, infrastructure and wholesale voice services provider | Euro | 100 | 100 |
| TT International Telekomünikasyon Sanayi ve Ticaret Limited Şirketi ("TTINT Turkey") (*) | Turkey | Internet/data services, infrastructure and wholesale voice services provider | Euro | 100 | 100 |
| Türk Telekom International UA LLC ("TTINT Ukraine") (*) | Ukraine | Internet/data services, infrastructure and wholesale voice services provider | Euro | 100 | 100 |
| Türk Telekom International Italy S.R.L. (TTINT Italy) (*) | Italy | Internet/data services, infrastructure and wholesale voice services provider | Euro | 100 | 100 |
| TTINT International MK DOOEL ("TTINT Macedonia") (*) | Macedonia | Internet/data services, infrastructure and wholesale voice services provider | Euro | 100 | 100 |
| Türk Telekom International RU LLC ("TTINT Russia") (*) | Russia | Internet/data services, infrastructure and wholesale voice services provider | Euro | 100 | 100 |
| Tasifye Halindeki Türk Telekomunikasyon Euro Gmbh. ("TT Euro") (*) | Germany | Mobil service marketing | Euro | 100 | 100 |
| Türk Telekom International d.o.o.(*) | Croatia | Internet/data services, infrastructure and wholesale voice services provider | Euro | 100 | 100 |
| Türk Telekom International HK Limited (*) | Hong Kong | Internet/data services, infrastructure and wholesale voice services provider | H.K. Dollar | 100 | 100 |
| Net Ekran TV ve Medya Hiz. A.Ş. ("Net Ekran") | Turkey | Television and radio broadcasting | Turkish Lira | 100 | 100 |
| TTES Elektrik Tedarik Satış A.Ş.("TTES") | Turkey | Electrical energy trading | Turkish Lira | 100 | 100 |
| TT Ödeme ve Elektronik Para Hizmetleri A.Ş | Turkey | Mobile finance | Turkish Lira | 100 | 100 |
| Net Ekran1 TV ve Medya Hiz. A.Ş. ("Net Ekran1") | Turkey | Television and radio broadcasting | Turkish Lira | 100 | 100 |
| Net Ekran2 TV ve Medya Hiz. A.Ş. ("Net Ekran2") | Turkey | Television and radio broadcasting | Turkish Lira | 100 | 100 |
| Net Ekran3 TV ve Medya Hiz. A.Ş. ("Net Ekran3") | Turkey | Television and radio broadcasting | Turkish Lira | 100 | 100 |
| Net Ekran4 TV ve Medya Hiz. A.Ş. ("Net Ekran4") | Turkey | Television and radio broadcasting | Turkish Lira | 100 | 100 |
| Net Ekran6 TV ve Medya Hiz. A.Ş. ("Net Ekran6") | Turkey | Television and radio broadcasting | Turkish Lira | 100 | 100 |
| Net Ekran10 TV ve Medya Hiz. A.Ş. ("Net Ekran10") | Turkey | Television and radio broadcasting | Turkish Lira | 100 | 100 |
| Net Ekran11 TV ve Medya Hiz. A.Ş. ("Net Ekran11") | Turkey | Television and radio broadcasting | Turkish Lira | 100 | 100 |
| TT Satış ve Dağıtım Hizmetleri Anonim Şirketi | Turkey | Selling and Distribution Services | Turkish Lira | 100 | 100 |
| TT Ventures Proje Geliştirme A.Ş. | Turkey | Corporate Venture Capital | Turkish Lira | 100 | 100 |
| TT Destek Hizmetleri A.Ş | Turkey | Provider of combined facilities support activities | Turkish Lira | 100 | 100 |
| APPYAP Teknoloji ve Bilişim A.Ş. | Turkey | Web portal and computer programming activities | Turkish Lira | 100 | 100 |
| TTG Finansal Teknolojiler A.Ş. | Turkey | Financial Advisory Services | Turkish Lira | 100 | 100 |

(*) Hereinafter, will be referred as TTINT Group.

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 1. REPORTING ENTITY (CONTINUED)

The details of the Company's joint operation as at 31 December 2021 and 31 December 2020 are as follows:

| | | | | Effective ownership of the Company (%) | |
|---|---|---|---|---|---|
| **Name of Joint Operation** | **Place of incorporation and operation** | **Principal activity** | **Functional Currency** | **31 December 2021** | **31 December 2020** |
| TT Mobil-Vodafone Evrensel İş Ortaklığı | Turkey | Internet/data services, infrastructure and wholesale voice services provider | Turkish Lira | 51 | 51 |

Hereinafter, Türk Telekom and its subsidiaries and joint operations together will be referred to as "the Group".

The Group's principal activities include the provision of local, national, international and mobile telecommunication services, internet products and services, as well as call center and customer relationship management, technology and information management.

The Company's registered office address is Turgut Özal Bulvarı, 06103 Aydınlıkevler, Ankara.

The number of personnel subject to collective agreement as of 31 December 2021 is 10.230 (31 December 2020: 10.063) and the number of personnel not subject to collective agreement as of 31 December 2021 is 25.638 (31 December 2020: 24.685). The total number of personnel as of 31 December 2021 and 31 December 2020 are 35.868 and 34.748, respectively.

## 2. BASIS OF PRESENTATION OF FINANCIAL STATEMENTS

### 2.1 Basis of presentation of the consolidated financial statements

### a) Statement of compliance with TAS

The accompanying consolidated financial statements are prepared in accordance with Turkish Financial Reporting Standards ("TFRS") published by Public Oversight Accounting and Auditing Standards Authority ("POA") as set out in the Communiqué numbered II-14.1 "Communiqué on Principles of Financial Reporting in Capital Markets" published in the Official Gazette numbered 28676 on 13 June 2013. TFRS consist of standards and interpretations which are published as Turkish Accounting Standards ("TAS"), Turkish Financial Reporting Standards, interpretations of TAS and interpretations of TFRS.

The consolidated financial statements are presented in accordance with the TFRS Taxonomy developed based on the Illustrative Financial Statements and User Guide published in the Official Gazette numbered 30794 on 7 June 2019.

*Approval of the financial statements:*

The consolidated financial statements are approved by the Company's Board of Directors on 15 February 2022. General Assembly has the right to change the consolidated financial statements.

### b) Correction of financial statements during the hyperinflationary periods

CMB, with its resolution dated 17 March 2005, announced that all publicly traded entities operating in Turkey was not obliged to apply inflationary accounting effective from 1 January 2005. In accordance with this resolution, TAS 29 "Financial Reporting in Hyperinflationary Economies" is not applied to the consolidated financial statements since 1 January 2005.

## 2. BASIS OF PRESENTATION OF FINANCIAL STATEMENTS (CONTINUED)

### 2.1 Basis of presentation of the consolidated financial statements (continued)

#### b) Correction of financial statements during the hyperinflationary periods (continued)

In the announcement published by the Public Oversight Accounting and Auditing Standards Authority on January 20, 2022, it is stated that TAS 29 Financial Reporting in Hyperinflationary Economies does not apply to the TFRS financial statements as of December 31, 2021, since the cumulative change in the general purchasing power of the last three years according to Consumer Price Index (CPI) is 74,41%. In this respect, consolidated financial statements as of December 31, 2021 are not adjusted for inflation in accordance with TAS 29.

#### c) Basis of measurement

The consolidated financial statements have been prepared on the historical cost basis except for the property, plant and equipment other than lands and investment property acquisitions prior to 1 January 2000 for which the deemed cost method was applied in accordance with TAS 29 "Financial Reporting in Hyperinflationary Economies", lands, derivative financial instruments, issued debt instruments which have been measured at fair value through profit or loss. Investment properties and tangible assets other than lands which are recognized with deemed cost method are valued with fair values as of 1 January 2000, lands accounted as property, plant and equipment, derivative financial instruments and issued debt instruments which have been measured at fair value through profit or loss, are valued with fair values as of balance sheet date. The methods used in fair value measurement are also specified in note 2.3 (t).

#### d) Functional and presentation currency

Excluding the subsidiaries incorporated outside of Turkey, functional currency of all entities' included in consolidation is Turkish Lira ("TL") and they maintain their books of account in TL in accordance with Turkish Commercial Code, Tax Legislation and the Uniform Chart of Accounts issued by the Ministry of Finance.

Functional currencies of the subsidiaries and Company's joint operation are presented in Note 1.

The consolidated financial statements are based on the statutory records, with adjustments and reclassifications for the purpose of fair presentation in accordance with the Turkish Accounting Standards published by the POA and are presented in TL.

**Additional paragraph for convenience translation to English:**

The accounting principles described in Note 2 (defined as Turkish Accounting Standards/Turkish Financial Reporting Standards) to the accompanying consolidated financial statements differ from International Financial Reporting Standards ("IFRS") issued by the International Accounting Standards Board ("IASB") with respect to the application of inflation accounting, classification of some income statement items and also for certain disclosures requirement of the POA.

### 2.2 Basis of consolidation

The accompanying financial statements include the accounts of the parent company Türk Telekom, its subsidiaries and joint operation. The financial statements of the entities included in the consolidation have been prepared as at the date of the consolidated financial statements.

#### a) Subsidiaries

As of 31 December 2021, the consolidated financial statements include the financial results of Türk Telekom and its subsidiaries that the Group has control over its financial and operational policies which are listed at Note 1.

## 2. BASIS OF PRESENTATION OF FINANCIAL STATEMENTS (CONTINUED)

### 2.2 Basis of consolidation (continued)

### a) Subsidiaries (continued)

Control is normally evidenced when the Company controls an investee if and only if the Company has all the following; a) power over the investee b) exposure, or rights, to variable returns from its involvement in the investee and c) the ability to use its power over the investee to affect the amount of company's returns. The results of subsidiaries acquired are included in the consolidated statements of income from the effective date of acquisition as appropriate.

When necessary, adjustments are made to the financial statements of subsidiaries to bring their accounting policies in line with those used by the Group. The consolidated financial statements are prepared using uniform accounting policies for similar transactions and events and are prepared with the same chart of accounts of the Company.

### b) Business combinations

From 1 January 2010 the Group has applied revised TFRS 3 "Business Combinations" standard. The change in accounting policy has been applied prospectively and had no effect on business combinations completed during prior periods.

Business combinations are accounted for using the acquisition method as at the acquisition date, which is the date on which control is transferred to the Group. The cost of an acquisition is measured as the aggregate of the consideration transferred, measured at acquisition date fair value and the amount of any non-controlling interest in the acquirer.

The consideration transferred is measured at fair value, which is calculated as the sum of the acquisition-date fair values of the assets transferred by the Group, the liabilities incurred by the Group to former owners of the entity and the equity interests issued by the Group. When the agreement with the seller includes a clause that the consideration transferred could be adjusted for future events, the acquisition-date fair value of this contingent consideration is included in the cost of the acquisition. All transaction costs incurred by the Group have been recognized in general administrative expenses.

For each business combination, the Group elects whether it measures the non-controlling interest in the acquirer either at fair value or at the proportionate share of the acquirer's identifiable net assets.

When the Group acquires a business, it assesses the financial assets and liabilities assumed for appropriate classification and designation in accordance with the contractual terms, economic circumstances and pertinent conditions as at the acquisition date. This includes the separation of embedded derivatives in host contracts by the acquirer.

Acquisition method requires allocation of the acquisition cost to the assets acquired and liabilities assumed at their fair values on the date of acquisition. Acquired assets and liabilities and contingent liabilities assumed according to TFRS 3 are recognized at fair values on the date of the acquisition. Acquired company is consolidated starting from the date of acquisition.

If the fair values of the acquired identifiable assets, liabilities and contingent liabilities or cost of the acquisition are based on provisional assessment as at the balance sheet date, the Group made provisional accounting. Temporarily determined business combination accounting has to be completed within twelve months following the combination date and adjustment entries have to be made beginning from the combination date.

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 2. BASIS OF PRESENTATION OF FINANCIAL STATEMENTS (CONTINUED)

### 2.2 Basis of consolidation (continued)

### c) Transactions eliminated on consolidation

Intra-group balances and transactions, and any unrealized income and expenses arising from intra-group transactions are eliminated in preparing the consolidated financial statements. Unrealized gains arising from transactions with associates are eliminated against the investment to the extent of the Group's interest in the investee. Unrealized losses are eliminated in the same way as unrealized gains, but only to the extent that there is no evidence of impairment.

### d) Foreign currency

#### *i) Foreign currency transactions*

Transactions in foreign currencies are translated to the functional currencies of the Group entities at the exchange rates ruling at the date of the transactions. Monetary assets and liabilities denominated in foreign currencies at reporting date are translated to the functional currency at the exchange rate ruling at the date. Foreign currency differences arising on translation of foreign currency transactions are recognized in the income statement, except for differences arising on qualifying cash flow hedges to the extent the hedge is effective, which are recognized in other comprehensive income.

Non-monetary assets and liabilities denominated in foreign currencies that are measured at fair value are retranslated to the functional currency at the exchange rate at the date that the fair value was determined. Non-monetary items in a foreign currency that are measured based on historical cost are translated using the exchange rate at the date of the transaction.

#### *ii) Foreign operations*

The assets and liabilities of foreign operations, including goodwill and fair value adjustments arising on acquisition, are translated to reporting currency at exchange rates at the reporting date. The income and expenses of foreign operations are translated to reporting currency at average exchange rates in the related periods.

Foreign currency differences are recognized in other comprehensive income and presented in the foreign currency translation reserve in equity.

The Group entities use USD, EUR or TL, as functional currency since these currencies are used to a significant extent in, or have a significant impact on, the operations of the related Group entities and reflect the economic substances of the underlying events and circumstances relevant to these entities. All currencies other than the functional currency selected for measuring items in the financial statements are treated as foreign currencies. Accordingly, transactions and balances not already measured in the functional currency have been remeasured to the related functional currencies. The Group uses TL as the reporting currency.

The financial statements of subsidiaries that report in the currency of an economy formerly accepted as hyperinflationary (Turkey) are restated to the unit of currency effective at the reporting date until 1 January 2005. As stated above, with the resolution dated 17 March 2005 to end the hyperinflation accounting for the periods starting after 31 December 2004, TL is not assessed as a currency of a hyperinflationary economy effective from 1 January 2005.

The foreign currency exchange rates as of the related periods are as follows:

| | **Average** | | **Period end** | |
|---|---|---|---|---|
| | **31 December 2021** | **31 December 2020** | **31 December 2021** | **31 December 2020** |
| EUR / TL | 10,4419 | 8,0140 | 15,0867 | 9,0079 |
| USD / TL | 8,8567 | 7,0034 | 13,3290 | 7,3405 |

## 2. BASIS OF PRESENTATION OF FINANCIAL STATEMENTS (CONTINUED)

### 2.2 Basis of consolidation (continued)

### d) Foreign currency (continued)

***iii) Hedge of net investment in a foreign operation***

The Company acquires foreign currency bank loans in order to hedge its net investment in a foreign operation. Foreign exchange gain and/or loss resulting from the subsidiary's net investment portion of this loan is reclassified to other comprehensive income. Foreign exchange gain and/or loss resulting from the subsidiary's net investment portion of this loan reclassified to other comprehensive income will be transferred to profit and loss in case of disposal. Tax effects of foreign exchange gain and/or loss resulting from the subsidiary's net investment portion of this loan is recognized under other comprehensive income as well.

### 2.3 Summary of significant accounting policies

### a) Financial instruments

*i. Recognition and initial measurement*

Trade receivables are initially recognized when they are originated. All other financial assets and financial liabilities are initially recognized when the Group becomes a party to the contractual provisions of the instrument.

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

*ii. Classification and subsequent measurement*

<u>Financial assets</u>

On initial recognition, a financial asset is classified as measured at: amortized cost, ("FVOCI") – equity investment, or FVTPL.

Financial assets are not reclassified subsequent to their initial recognition unless the Group changes its business model for managing financial assets in which case all affected financial assets are reclassified on the first day of the first reporting period following the change in the business model.

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

- it is held within a business model whose objective is to hold assets to collect contractual cash flows, and
- its contractual terms give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

On initial recognition of an equity investment that is not held for trading, the Group may irrevocably elect to present subsequent changes in the investment's fair value in other comprehensive income. This election is made on an investment-by-investment basis. The Group holds 6,84% of shares of Cetel as equity investment and has elected to present changes in fair value of Cetel in other comprehensive income.

All financial assets not classified as measured at amortized cost or FVOCI as described above are measured at FVTPL. This includes all derivative financial assets (Note 15) and equity investments measured at FVTPL.

## 2. BASIS OF PRESENTATION OF FINANCIAL STATEMENTS (CONTINUED)

## 2.3 Significant accounting policies (continued)

### a) Financial instruments (continued)

*ii. Classification and subsequent measurement (continued)*

Financial assets (continued)

On initial recognition, the Group may irrevocably designate a financial asset that otherwise meets the requirements to be measured at amortized cost or at FVOCI as at FVTPL if doing so eliminates or significantly reduces an accounting mismatch that would otherwise arise.

Financial assets: Business model assessment

The Group assesses the objective of the business model in which a financial asset is held at a portfolio level because this best reflects the way the business is managed and information is provided to management. The information considered includes:

- the stated policies and objectives for the portfolio and the operation of those policies in practice. These include whether management's strategy focuses on earning contractual interest income, maintaining a particular interest rate profile, matching the duration of the financial assets to the duration of any related liabilities or expected cash outflows or realizing cash flows through the sale of the assets;
- how the performance of the portfolio is evaluated and reported to the Group's management;
- the risks that affect the performance of the business model (and the financial assets held within that business model) and how those risks are managed;
- how managers of the business are compensated – e.g. whether compensation is based on the fair value of the assets managed or the contractual cash flows collected; and
- the frequency, volume and timing of sales of financial assets in prior periods, the reasons for such sales and expectations about future sales activity.

Transfers of financial assets to third parties in transactions that do not qualify for derecognition are not considered sales.

Financial assets that are managed and whose performance is evaluated on a fair value basis are measured at FVTPL.

Financial assets: Assessment whether contractual cash flows are "solely payments of principal and interest"

'Principal' is defined as the fair value of the financial asset on initial recognition. 'Interest' is defined as consideration for the time value of money and for the credit risk associated with the principal amount outstanding during a particular period of time and for other basic lending risks and costs (e.g. liquidity risk and administrative costs), as well as a profit margin. In assessing whether the contractual cash flows are "solely payments of principal and interest", the Group considers the contractual terms of the instrument. This includes assessing whether the financial asset contains a contractual term that could change the timing or amount of contractual cash flows such that it would not meet this condition.

In making this assessment, the Group considers:

- contingent events that would change the amount or timing of cash flows;
- terms that may adjust the contractual coupon rate, including variable rate features;
- prepayment and extension features; and

## 2. BASIS OF PRESENTATION OF FINANCIAL STATEMENTS (CONTINUED)

### 2.3 Significant accounting policies (continued)

### a) Financial instruments (continued)

*ii. Classification and subsequent measurement (continued)*

Financial assets: Assessment whether contractual cash flows are solely payments of principal and interest (continued)

- terms that limit the Group's claim to cash flows from specified assets (e.g. non-recourse features).

A prepayment feature is consistent with the solely payments of principal and interest criterion if the prepayment amount substantially represents unpaid amounts of principal and interest on the principal amount outstanding, which may include reasonable additional compensation for early termination of the contract. Additionally, for a financial asset acquired at a significant discount or premium to its contractual par amount, a feature that permits or requires prepayment at an amount that substantially represents the contractual par amount plus accrued (but unpaid) contractual interest (which may also include reasonable additional compensation for early termination) is treated as consistent with this criterion if the fair value of the prepayment feature is insignificant at initial recognition.

Trade receivables and other receivables meet solely payments of principal and interest test since principal is the present value of the expected cash flows. Those receivables are managed in line with the held to collect business model.

Financial assets: Subsequent measurement and gains and losses

| | |
|---|---|
| **Financial assets at FVTPL** | Financial assets at FVTPL are comprised of derivatives. These assets are subsequently measured at fair value. Net gains and losses, including any interest, are recognized in profit or loss. |
| **Financial assets at amortized cost** | Financial assets at amortized cost are comprised of cash and cash equivalents, trade receivables, other receivables and other assets. These assets are subsequently measured at amortized cost using the effective interest method. The amortized cost is reduced by impairment losses. Interest income, foreign exchange gains and losses and impairment are recognized in profit or loss. Any gain or loss on de-recognition is recognized in profit or loss. |
| **Equity investments at FVTPL** | Equity investments at FVTPL are subsequently measured at fair value. Net gains and losses, including any interest or dividend income, are recognized in profit or loss. |
| **Equity investments at FVOCI** | Equity investments at FVOCI include the Group's 6,84% of share of Cetel. These assets are subsequently measured at fair value. Dividends are recognized as income in profit or loss unless the dividend clearly represents a recovery of part of the cost of the investment. Other net gains and losses are recognized in OCI and are never reclassified to profit or loss. |

Cash and cash equivalents

Cash and cash equivalents include cash held in cash, deposits held in banks and other liquid investments with maturities of 3 months or less. Cash and cash equivalents used in the reporting of cash flows comprise cash and cash equivalents with a maturity of less than 3 months, excluding accrued interest income and blocked deposits. The Group calculates impairment by using the expected credit loss model in cases where cash and cash equivalents are not impaired for a certain reason. The expected credit loss calculation considers the past experiences of credit losses as well as the Group's forecasts for the future.

## 2. BASIS OF PRESENTATION OF FINANCIAL STATEMENTS (CONTINUED)

## 2.3 Significant accounting policies (continued)

### a) Financial instruments (continued)

*ii. Classification and subsequent measurement (continued)*

*Financial liabilities: Classification, subsequent measurement and gains and losses*

Financial liabilities are classified as measured at amortized cost or FVTPL. A financial liability is classified as at FVTPL if it is classified as held-for-trading, it is a derivative or it is designated as such on initial recognition. Financial liabilities at FVTPL are measured at fair value and net gains and losses, including any interest expense, are recognized in profit or loss. The Group does not have any financial liabilities at FVTPL except for derivatives and issued debt instruments.

Other financial liabilities are subsequently measured at amortized cost using the effective interest method. Interest expense and foreign exchange gains and losses are recognized in profit or loss. Any gain or loss on derecognition is also recognized in profit or loss.

***Non-derivative financial liabilities***

The Group initially recognized debt securities issued and subordinated liabilities on the date that they were originated. All other financial liabilities were recognized initially on the trade date, which was the date that the Group becomes a party to the contractual provisions of the instrument.

The Group classified non-derivative financial liabilities into the other financial liabilities category except for issued debt instruments. Such financial liabilities were recognized initially at fair value less any directly attributable transaction costs. Subsequent to initial recognition, these financial liabilities were measured at amortized cost using the effective interest method.

Other financial liabilities were comprised of loans, trade and other payables, payables to related parties and other payables.

The amount of change in the fair value of the issued debt instruments at FVTPL that is attributable to changes in the credit risk of that liability is recognized in other comprehensive income and the remaining amount of change in the fair value is recognized in profit or loss.

Trade payables were payables to third parties in relation to their capacity as suppliers. Payables stemming from transactions with parties that were not suppliers or customers which were not classified as trade payables and were not a result of financing operations were recognized as other payables.

When a financial instrument gave rise to a contractual obligation on the part of the Group to deliver cash or another financial asset or to exchange another financial instrument under conditions that were potentially unfavourable, it was classified as a financial liability. The instrument was equity instrument if, the following were met:

a) The instrument included no contractual obligation to deliver cash or another financial asset to another entity; or to exchange financial assets or financial liabilities with another entity under conditions that were potentially unfavourable to the Group.

b) If the instrument would or might be settled in the Group's own equity instruments, it was a non-derivative that included no contractual obligation for the Group to deliver a variable number of its own equity instruments; or a derivative that would be settled only by the Group exchanging a fixed amount of cash or another financial asset for a fixed number of its own equity instruments.

## 2. BASIS OF PRESENTATION OF FINANCIAL STATEMENTS (CONTINUED)

## 2.3 Significant accounting policies (continued)

### a) Financial instruments (continued)

*ii. Classification and subsequent measurement (continued)*

***Non-derivative financial liabilities (continued)***

*Borrowing Costs*

If financing costs arising from the loans are associated with acquisition or construction of qualifying assets, they are included in cost value of qualifying assets. Qualifying assets refer to assets which require a long time to be available for use or sales as intended. Other borrowing costs are accounted in statement of profit or loss in the period they occur.

*iii. Derecognition*

*Financial assets*

The Group derecognized a financial asset when the contractual rights to the cash flows from the asset expired, or it transferred the rights to receive the contractual cash flows in a transaction in which substantially all the risks and rewards of ownership of the financial asset were transferred. Any interest in such transferred financial assets that was created or retained by the Group was recognized as a separate asset or liability.

*Financial liabilities*

The Group derecognizes a financial liability when its contractual obligations are discharged or cancelled or expired. The Group also derecognizes a financial liability when its terms are modified and the cash flows of the modified liability are substantially different, in which case a new financial liability based on the modified terms is recognized at fair value.

On derecognition of a financial liability, the difference between the carrying amount extinguished and the consideration paid (including any non-cash assets transferred or liabilities assumed) is recognized in profit or loss.

*iv. Offsetting*

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

*v. Impairment*

*Financial instruments and contract assets*

The Group recognizes loss allowances for ECLs on:

- financial assets measured at amortized cost;
- contract assets (as defined in TFRS 15).

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

- Lifetime ECLs are the ECLs that result from all possible default events over the expected life of a financial instrument; and
- 12-month ECLs are the portion of ECLs that result from default events that are possible within the 12 months after the reporting date (or a shorter period if the expected life of the instrument is less than 12 months).

## 2. BASIS OF PRESENTATION OF FINANCIAL STATEMENTS (CONTINUED)

### 2.3 Significant accounting policies (continued)

### a) Financial instruments (continued)

*v. Impairment (continued)*

*Financial instruments and contract assets (continued)*

The Group measures loss allowances at an amount equal to lifetime ECL, except for the following, which are measured as 12-month ECL:

- bank balances for which credit risk has not increased significantly since initial recognition.

Loss allowances for trade receivables, other receivables, other assets and contract assets are always measured at an amount equal to lifetime ECL.

When determining whether the credit risk of a financial asset has increased significantly since initial recognition and when estimating ECL, the Group considers reasonable and supportable information that is relevant and available without undue cost or effort. This includes both quantitative and qualitative information and analysis, based on the Group's historical experience and informed credit assessment and including forward-looking information.

The Group assumes that the credit risk on a financial asset has increased significantly if it is more than 30 days past due.

The Group considers a financial asset to be in default when:

- the borrower is unlikely to pay its credit obligations to the Group in full, without recourse by the Group to actions such as realizing security (if any is held); or
- the financial asset is more than 90 days past due.

The Group considers bank balances to have low credit risk when its credit risk rating is equivalent to the globally understood definition of 'investment grade'.

The maximum period considered when estimating ECLs is the maximum contractual period over which the Group is exposed to credit risk.

12-month expected credit losses are that result from possible default events within the 12 months after the reporting date.

The maximum period considered when estimating expected credit losses is the maximum contractual period over which the Group is exposed to credit risk.

*Measurement of ECLs*

ECLs are a probability-weighted estimate of credit losses. Credit losses are measured as the present value of all cash shortfalls.

ECLs are discounted at the effective interest rate of the financial asset.

For trade receivables, other receivables, other assets and contract assets the Group applies the simplified approach to providing for expected credit losses prescribed in TFRS 9, which requires the use of the lifetime expected loss provision for all trade receivables. The Group performed the calculation of ECL rates separately for individual, corporate, public and wholesale customers. The ECLs were calculated based on actual credit loss experience over the past years.

Exposures within each group were segmented based on common credit risk characteristics such as delinquency status.

## 2. BASIS OF PRESENTATION OF FINANCIAL STATEMENTS (CONTINUED)

## 2.3 Significant accounting policies (continued)

### a) Financial instruments (continued)

*v. Impairment (continued)*

*Measurement of ECLs (continued)*

Actual credit loss experience was adjusted to reflect differences between economic conditions during the period over which the historical data was collected, current conditions and the Group's view of economic conditions over the expected lives of the receivables. Future collection performance of receivables is estimated by considering general economic conditions to incorporate forward looking information to the expected credit loss calculations.

*Credit-impaired financial assets*

At each reporting date, the Group assesses whether financial assets carried at amortized cost are credit-impaired. A financial asset is 'credit-impaired' when one or more events that have a detrimental impact on the estimated future cash flows of the financial asset have occurred.

Evidence that a financial asset is credit-impaired includes the following observable data:

- significant financial difficulty of the borrower or issuer;
- a breach of contract such as a default or being more than 90 days past due;
- the restructuring of a loan or advance by the Group on terms that the Group would not consider otherwise;
- it is probable that the borrower will enter bankruptcy or other financial re-organization; or
- the disappearance of an active market for a security because of financial difficulties.

Presentation of impairment in the statement of financial position

Loss allowances for financial assets measured at amortized cost are deducted from the gross carrying amount of the assets.

Impairment losses related to trade and other receivables, including contract assets, are presented separately in the statement of profit or loss. Impairment losses on other financial assets are presented under 'general administrative expenses', similar to the presentation under TAS 39, and not presented separately in the consolidated statement of profit or loss due to materiality considerations.

Write-off

The gross carrying amount of a financial asset is written off (either partially or in full) to the extent that there is no realistic prospect of recovery. This is generally the case when the Group determines that the debtor does not have assets or sources of income that could generate sufficient cash flows to repay the amounts subject to the write-off. However, financial assets that are written off could still be subject to enforcement activities in order to comply with the Group's procedures for recovery of amounts due.

Financial assets are written off when there is no reasonable expectation of recovery, such as a debtor failing to engage in a repayment plan with the Group. Where trade receivables, other receivables, other assets and contract assets have been written off, the Group continues to engage in enforcement activity to attempt to recover the receivable due. Where recoveries are made, these are recognized in profit or loss.

## 2. BASIS OF PRESENTATION OF FINANCIAL STATEMENTS (CONTINUED)

### 2.3 Significant accounting policies (continued)

### a) Financial instruments (continued)

*vi. Derivative financial instruments*

*Cash flow hedges*

The Group has adopted TFRS 9 *Financial Instruments*, replacing TAS 39 in accordance with the risk management strategy and objectives as of 1 July 2018. The high-level aim of the new hedge accounting model is that financial reporting will reflect more accurately how an entity manages its risk and the extent to which hedging mitigates those risks. Specifically, the new model aims to provide a better link between an entity's risk management strategy, the rationale for hedging and the impact of hedging on the financial statements.

The Group enters into participating cross currency swap transactions in order to hedge the changes in cash flows of floating and fixed 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 "other comprehensive income/expense items to be reclassified to profit or loss" in equity, and the ineffective portion is recognized in profit or loss. The changes recognized in equity is removed and included in profit or loss in the same period when the hedged cash flows effect the profit or loss. In addition, time value of options included in participating cross currency swaps are accounted for cost of hedging and recognized under other comprehensive income.

Under IFRS 9, a hedging relationship is discontinued in its entirety when as a whole it ceases to meet the qualifying criteria after considering the rebalancing of the hedging relationship. Voluntary discontinuation when the qualifying criteria are met is prohibited. Hedge accounting is discontinued when the risk management objective for the hedging relationship has changed, the hedging instrument expires or is sold, terminated or exercised, there is no longer an economic relationship between the hedged item and hedging instrument or when the effect of credit risk starts dominating the value changes that result from the economic relationship.

When the Group discontinues hedge accounting for a cash flow hedge it shall account for the amount that has been accumulated in the cash flow hedge reserve in accordance as follows;

-if the hedged future cash flows are still expected to occur, that amount shall remain in the cash flow hedge reserve until the future cash flows occur.

-if the hedged future cash flows are no longer expected to occur, that amount shall be immediately reclassified from the cash flow hedge reserve to profit or loss as a reclassification adjustment. A hedged future cash flow that is no longer highly probable to occur may still be expected to occur. The amount recognized in OCI prior discontinuation will be reclassified from OCI to Profit and Loss, in accordance with the contractual cash flow of the hedged item.

The new hedge effectiveness testing model is prospective only and can be qualitative, depending on the complexity of the hedge. Effectiveness range 80%-125% in TAS 39 is replaced by an objectives-based test that focuses on the economic relationship between the hedged item and the hedging instrument, and the effect of credit risk on that economic relation.

## 2. BASIS OF PRESENTATION OF FINANCIAL STATEMENTS (CONTINUED)

### 2.3 Significant accounting policies (continued)

### b) Property, plant and equipment

#### *i) Recognition and measurement*

Property, plant and equipment ("PPE") of the Group other than lands is carried at cost less accumulated depreciation and any accumulated impairment losses. The Group elected to measure property, plant and equipment of the Company on a deemed cost basis in the first period of application of TAS 29 "Financial Reporting in Hyper Inflationary Economy" since detailed records of the acquisition date and costs of items of PPE were not available for the Company prior to 1 January 2000. The deemed cost values for buildings as of 1 January 2000 were appraised by CMB licensed real-estate valuation companies. The network equipment and vehicles values were appraised by Detecon International GmbH (a subsidiary of Deutsche Telecom AG). Other than the PPE for which cost was determined on a deemed cost basis, the cost of PPE generally comprises its purchase price, including import duties and non-refundable purchase taxes and any directly attributable costs of bringing the asset to its working condition and location for its intended use. PPE that are recognized at deemed cost basis or at cost are restated for the effects of inflation until 31 December 2004 in accordance with TAS 29.

Lands accounted as property, plant and equipment are measured at revalued amount. Revalued amount for lands is the fair value at the date of the revaluation less any subsequent accumulated depreciation and subsequent accumulated impairment losses.

Revaluations are performed in regular intervals depending on the changes in fair values of the items of lands being revalued. The increase in carrying amount of lands as a result of revaluation is recognized in components of other comprehensive income component. When land's carrying amount declines as a result of a revaluation, this declined amount is recognized in profit or loss.

However, the decline shall be recognized in other comprehensive income to the extent of any credit balance existing in the revaluation surplus. Thus, the relevant decline reduces the accumulated amount in equity under the heading of revaluation surplus.

Cost includes expenditure that is directly attributable to the acquisition of the asset. The cost of self-constructed assets includes the cost of materials and direct labour costs are located and capitalized borrowing costs. Purchased software that is integral to the functionality of the related equipment is capitalized as part of that equipment. When parts of an item of property and equipment have different useful lives, they are accounted for as separate items (major components) of property and equipment.

Gains and losses on disposal of an item of property and equipment are calculated as the difference between the net proceeds from disposal and the carrying amount of the item and are recognized net within "income / (expense) from investing activities" in profit or loss.

#### *ii) Subsequent cost*

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

## 2. BASIS OF PRESENTATION OF FINANCIAL STATEMENTS (CONTINUED)

### 2.3 Summary of significant accounting policies (continued)

### b) Property, plant and equipment (continued)

***iii) Depreciation***

Depreciation is calculated effective from purchase or replacement date to write off the cost of items of property, plant and equipment less their estimated residual values using the straight-line basis over their estimated useful lives. Land is not depreciated.

Useful lives of property, plant and equipment are as follows:

| *Property plant and equipment* | *Useful life (years)* |
|---|---|
| Buildings | 21-50 years |
| Outside plant | 5-21 years |
| Transmission equipment | 5-21 years |
| Switching equipment | 5-8 years |
| Data networks | 3-10 years |
| Vehicles | 5 years |
| Furniture and fixtures | 3-5 years |
| Set-top box and satellite receiver | 4 years |
| Other property, plant and equipment | 2-8 years |

Useful lives and residual values are reviewed at each reporting date and adjusted if appropriate.

The remaining useful lives of the PPE of the Company are limited to the concession periods. Considering the Concession Agreement the remaining useful lives of tangible fixed assets are 5 years at the most.

Leased assets are depreciated by the same method used for property and equipment over the shorter of the lease term and their useful lives.

### c) Intangible assets

***i) Goodwill***

Goodwill that arises on the acquisition of subsidiaries is included in intangible assets.

The Group measures goodwill at the acquisition date as:

- The fair value of the consideration transferred; plus
- The recognized amount of any non-controlling interests in the acquiree; plus
- If the business combination is achieved in stages, the fair value of the pre-existing equity interest in the acquiree; less
- The net recognized amount (generally fair value) of the identifiable assets acquired and liabilities assumed.

When the excess is negative, a bargain purchase gain is recognized immediately in profit or loss. The consideration transferred does not include amounts related to the settlement of pre-existing relationships. Such amounts are generally recognized in profit or loss. Transactions costs, other than those associated with the issuance of debt or equity securities, that the Group incurs in connection with a business combination are expensed as incurred.

*Subsequent measurement*

Goodwill is measured at cost less accumulated impairment losses.

## 2. BASIS OF PRESENTATION OF FINANCIAL STATEMENTS (CONTINUED)

### 2.3 Summary of significant accounting policies (continued)

### c) Intangible assets (continued)

#### *ii) Other intangible assets*

Intangible assets acquired separately are measured on initial recognition at cost. Following initial recognition, intangible assets are carried at cost less any accumulated amortization and any accumulated impairment losses. Internally generated intangible assets, excluding capitalized development costs, are not capitalized and expenditure is charged to the consolidated income statement during the year when the expenditure is incurred.

The useful lives of intangible assets are assessed to be either finite or infinite. The Group does not have any intangible assets with infinite useful lives. Intangible assets with finite lives are amortized on a straight line basis over the shorter of their useful economic lives or remaining concession period. Whenever there is an indication that the intangible asset may be impaired it is assessed for impairment. The amortization period and the amortization method for an intangible asset with a finite useful life are reviewed each financial year end at least.

Changes in the expected useful lives or the expected pattern of consumption of future economic benefits embodied in the asset are accounted for by changing the amortization period or method, as appropriate, and treated as changes in estimates. The amortization expense on intangible assets with finite lives is recognized in the consolidated income statement. The amortization periods for intangible assets are between 3 and 25 years. The remaining useful lives of the intangible items are limited to the concession period. Considering the Concession Agreement, the remaining useful lives of intangible assets are 5 years at the most.

#### *iii) Research and development*

Research costs are expensed as incurred. Development expenditure on an individual project is recognized as an intangible asset when the Group can demonstrate the technical feasibility of completing the intangible asset so that it will be available for use or sale, its intention to complete and its ability to use or sell the asset, how the asset will generate future economic benefits, the availability of resources to complete the asset and the ability to measure reliably the expenditure during development.

Impairment test is performed periodically in order to identify whether there is any impairment in the development stage. After initial recognition, development costs are recognized at cost less amortization and impairment. Amortization of the asset begins when development is complete and the asset is available for use. It is amortized over the period of expected future benefit. Periodic impairment tests are applied to the assets in order to foresee any probable impairment on the assets in the period that they are not ready for utilization yet.

#### *iv) TV contents*

Rights to feature contents such as films, TV shows etc. acquired under license agreements along with related obligations are recorded at the contract value when a license agreement is executed or the license period has begun. The amounts recognized are amortized on the licensing period or a per play basis over the licensing period. To the extent that it is determined that the content has no future programming usefulness and will no longer be exploited, the unamortized cost of the content is written off.

## 2. BASIS OF PRESENTATION OF FINANCIAL STATEMENTS (CONTINUED)

### 2.3 Summary of significant accounting policies (continued)

### d) Investment properties

Investment properties, which are properties held to earn rent and/or for capital appreciation are measured initially at cost plus all direct transaction costs. The carrying amount includes the cost of replacing part of an existing investment property at the time that cost is incurred if the recognition criteria are met; and excludes the costs of day-to-day servicing of an investment property. The Group decided to measure investment property on a deemed cost basis in the first period of application of TAS 29, since detailed records of the acquisition date and costs of items of investment property were not available prior to 1 January 2000 and restated these deemed cost basis for the effects of inflation until 31 December 2004.

Investment properties are transferred from/to property, plant and equipment when their utilization purpose is changed. When investment properties are disposed, the difference between sales revenue and the carrying amount is charged to the consolidated income statement.

Market values of the investment properties on 1 January 2000 were determined by CMB licensed independent real-estate appraisers. Following initial recognition, investment properties are carried at costs less any accumulated amortization and any accumulated impairment losses.

Depreciation is charged to investment properties excluding land, over their estimated useful economic lives, using the straight-line method. The useful lives of buildings that are owned by the Group range between 15 - 50 years. The remaining useful life of the investment property is limited by the concession agreement, except for the exception of the concession agreement. When considering the Concession agreement the remaining useful lives of investment property is 5 years at the most.

### e) Assets held for sale

The Group classifies a non-current asset as held for sale if its carrying amount will be recovered principally through a sale transaction rather than through continuing use. For this to be the case, the asset (or the group of assets held for sale) must be available for immediate sale in its present condition subject only to terms that are usual and customary for sales of such assets and its sale must be highly probable. For the sale to be highly probable management must be committed to a plan to sell the asset (or the group of assets held for sale) and an active program to set the buyers and complete the plan must have been initiated. Furthermore, the asset (or the group of assets held for sale) must be actively marketed for sale at a price that is reasonable in relation to its fair value. In addition, the sale should be expected to qualify for recognition as a completed sale within one year from the date of classification and actions required to complete the plan should indicate that it is unlikely that significant changes to the plan will be made or that the plan will be withdrawn.

In case the period to complete sale of assets is extended due to circumstances which are not under the control of the Group, the assets will continue to be classified as assets held for sale provided that the Group has still an active sales program.

The Group measures assets held for sale at the lower of its carrying amount and fair value less costs to sell. The Group does not depreciate a non-current asset when it is classified as held for sale and the gain or loss arising from the sale of the assets is classified at income / expense from investing activities accounts.

## 2. BASIS OF PRESENTATION OF FINANCIAL STATEMENTS (CONTINUED)

### 2.3 Summary of significant accounting policies (continued)

### f) Leases

The Group has applied TFRS 16 using the modified retrospective approach and therefore the comparative information has not been restated and continues to be reported under TAS 17 and TFRS Interpretation 4. The details of accounting policies under TAS 17 and TFRS Interpretation 4 are disclosed separately.

### g) Inventory

Inventories are recognized at the lower of cost and net realizable value. Costs comprise purchase cost and, where applicable and those overheads that have been incurred in bringing the inventories to their present location and condition. Cost is calculated using the weighted average method. Net realizable value is the less marketing, selling and other various expenses to be incurred in order to realize sale.

### h) Impairment

***Non-financial assets***

Property, plant and equipment

At each balance sheet date, the Group assesses whether there is an indication that any of its PPE and intangible assets may be impaired. If such an indication exists, the recoverable amount of the asset is estimated in order to determine the extent of the impairment loss. Where it is not possible to estimate the recoverable amount of an individual asset, the Group estimates the recoverable amount of the cash-generating unit to which the asset belongs.

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

If the recoverable amount of an asset (or cash-generating unit) is estimated to be less than its carrying amount, the carrying amount of the asset (cash-generating unit) is reduced to its recoverable amount. An impairment loss is recognized in the consolidated income statement.

Where an impairment loss subsequently reverses, the carrying amount of the asset (cash-generating unit) is increased to the revised estimate of its recoverable amount, but so that the increased carrying amount does not exceed the carrying amount that would have been determined had no impairment loss been recognized for the asset (cash-generating unit) in prior years. A reversal of an impairment loss is recognized immediately in the consolidated income statement.

Goodwill

Goodwill is reviewed for impairment, annually or more frequently if events or changes in circumstances indicate that the carrying value may be impaired. Whenever the carrying amount exceeds the recoverable amount, an impairment loss is recognized in the consolidated income statement.

For the purpose of impairment testing, goodwill acquired in a business combination is, from the acquisition date, allocated to each of the cash-generating units or groups of cash-generating units that are expected to benefit from the synergies of the acquisition, irrespective of whether other assets or liabilities are assigned to these units or groups of units. Each unit or group of units to which the goodwill is allocated represents the lowest level within the Group at which the goodwill is monitored for internal management purposes.

## 2. BASIS OF PRESENTATION OF FINANCIAL STATEMENTS (CONTINUED)

## 2.3 Significant accounting policies (continued)

### h) Impairment (continued)

***Non-financial assets (continued)***

<u>Goodwill (continued)</u>

Impairment is determined by assessing the recoverable amount of the cash-generating unit (group of cash generating units), to which the goodwill relates. Where the recoverable amount of the cash-generating unit (group of cash-generating units) is less than the carrying amounts of the net assets assigned to the cash-generating unit, an impairment loss is recognized. Impairment losses relating to goodwill cannot be reversed in future periods.

### i) Reserve for employee severance indemnity

Payments to defined contribution retirement benefit plans are charged as an expense in the year in which the contributions relate to. Payments made to the Social Security Institution of Turkey and Turkish Republic Retirement Fund are dealt with as payments to defined contribution plans where the Group's obligations under the plans are equivalent to those arising in a defined contribution retirement benefit plan. The Group pays contributions to the Social Security Institution of Turkey on a mandatory basis. The Group has no further payment obligations once the contributions have been paid. The contributions are recognized as an employee benefit expense in the period to which the employees' service relates.

For defined benefit plans and other long-term employment benefits, the cost of providing benefits is determined using the projected unit credit method, with actuarial valuations being carried out at each balance sheet date. The Company recognizes the service cost of the previous period as expense at the earlier of the dates below:

- The date of the change or reduction in the plan, and

- The date of the recognition of the related restructuring costs (see: TAS 37) or the benefits deriving from the termination of the employment contract,

The retirement benefit obligation recognized in consolidated statement of financial position represents the present value of the defined benefit obligation as adjusted for any unrecognized past service cost. There is no funding requirement for defined benefit plans. The Group recognizes actuarial gains and losses in the other comprehensive income.

### j) Provisions

Provisions are recognized when the Group has a present obligation as a result of a past event, and it is probable that an outflow of resources embodying economic benefits will be required to settle that obligation, and a reliable estimate can be made of the amount of the obligation. Provisions are measured at the management's best estimate of the expenditure required to settle the obligation at the balance sheet date and are discounted to present value where the effect is material.

## 2. BASIS OF PRESENTATION OF FINANCIAL STATEMENTS (CONTINUED)

## 2.3 Significant accounting policies (continued)

### k) Contingent assets and liabilities

Possible assets or obligations that arise from past events and for which their existence will be confirmed only by the occurrence or non-occurrence of one or more uncertain future events not entirely within the control of the Group are treated as contingent assets or liabilities.

A contingent liability is disclosed, unless the possibility of an outflow of resources embodying economic benefits is remote. If the possibility of transfer of assets is probable, contingent liability is recognized in the financial statements.

A contingent asset is disclosed in consolidated financial statements when the possibility of an inflow of economic benefits to the entity is probable. If it has become virtually certain that an inflow of economic benefits will arise, the asset and the related income are recognized in the financial statements of the period in which the change occurs.

### l) Related parties

a) Parties are considered related to the Company if a person or a close member of that person's family is related to a reporting entity:

if that person:

i. Has control or joint control over the reporting entity,
ii. Has significant influence over the reporting entity, or
iii. Is a member of the key management personnel of the reporting entity or of a parent of the reporting entity.

b) The entity and the reporting entity are members of the same group:

- The entity and the company are members of the same group,
- One entity is an associate or joint venture of the other entity (or an associate or joint venture of a member of a group of which the other entity is a member),
- Both entities are joint ventures of the same third party,
- One entity is a joint venture of a third entity and the other entity is an associate of the third entity,
- The entity is a post-employment benefit plan for the benefit of employees of either the reporting entity or an entity related to the reporting entity. If the reporting entity is itself such a plan, the sponsoring employers are also related to the reporting entity,
- The entity is controlled or jointly controlled by a person identified in (a),
- A person identified in (a) (i) has significant influence over the entity or is a member of the key management personnel of the entity (or of a parent of the entity).

### m) Revenue

Revenue is measured based on the consideration specified in a contract with a customer and excludes amounts collected on behalf of third parties. The Group recognizes revenue when it transfers control over a product or service to a customer.

***i) Fixed line revenues***

Revenues from fixed-line telecommunication services like network access, local usage, domestic and international long distance and infrastructure leases are recognized on an accrual basis as services are provided.

## 2. BASIS OF PRESENTATION OF FINANCIAL STATEMENTS (CONTINUED)

### 2.3 Summary of significant accounting policies (continued)

### m) Revenue (continued)

***i) Fixed line revenues (continued)***

Connection fees that are assessed as distinct are recognized as revenue. Connection fees for activities that are an improvement to or an extension of the Group's own network, rather than a transfer of goods or services to the customer are determined as not distinct and no separate revenue is recognized. For distinct connection fees in a bundle, revenue recognized is measured based on their stand-alone selling prices. The stand-alone selling prices of connection fees are estimated based on expected cost plus a margin approach. Distinct connection fees are immediately recognized as revenue when connection services are provided and the cost of connection is also recognized immediately as an expense.

Revenues from sale of indefeasible right of use contracts, which are long term capacity/line rental arrangements, are accounted over the term of the contract.

***ii) Mobile revenues***

Revenues generated from mobile telecommunication services such as outgoing and incoming traffic, roaming revenues, revenues from value added services and monthly fees which are recognized at the time services are rendered. With respect to prepaid outgoing revenues, the Group generally collects cash in advance by selling scratch cards to dealers and distributors. In such cases, the Group does not recognize revenues until the subscribers use the service and present such amounts under deferred revenues in the consolidated financial statements.

The Group recognizes content revenue based on the agreement between the Group and the content providers. As the Group is the primary obligor of the service, the revenue received from the subscribers is presented on gross basis and the portion paid to the content providers is recognized as operating expense.

***iii) Equipment sale revenues***

Revenues from sales of phone device, modem and other network equipment are recorded as revenue when control over a product or service is transferred to a customer.

For bundled packages, the Group accounts for individual products and services separately if they are distinct – i.e. if a product or service is separately identifiable from other items in the bundled package and if a customer can benefit from it either on its own or together with other resources that are readily available to the customer. The consideration is allocated between distinct products and services in a bundle based on their stand-alone selling prices. The stand-alone selling prices are determined based on the list prices at which the Group sells those products and services separately. For items that are not sold separately the Group estimates stand-alone selling prices using the expected cost plus a margin approach. Equipment revenues are presented in other revenues. Cost of products and services are recognized as expense when related revenue is recognized.

***iv) TV revenues***

Revenues from TV subscriptions are charged to contract customers on a monthly basis. Revenues are invoiced and recorded as part of a periodic billing cycle and are recognized as the services are provided. Pay-per-view revenue is recognized when the movie is rented. Advertising revenue is recognized as the commercials are aired.

## 2. BASIS OF PRESENTATION OF FINANCIAL STATEMENTS (CONTINUED)

## 2.3 Significant accounting policies (continued)

### m) Revenue (continued)

***v) Subscriber acquisition costs***

Subscriber acquisition costs include commissions and premiums incurred for acquisition and retention of subscribers.

The Group capitalizes these commission and premiums as incremental costs of obtaining a contract with a customer and if they are expected to be recovered. Subscriber acquisition costs are amortized consistently during the subscriber life cycle and subscriber retention costs are amortized consistently during the renewal period and amortization expense is recognized in marketing, sales and distribution expenses.

***vi) Significant financing component***

To estimate the transaction price in a contract, the Group adjusts the promised amount of consideration for the time value of money if that contract contains a significant financing component. Significant financing component exists if the timing of payments agreed to by the parties to the contract (either explicitly or implicitly) provides the customer or the Group with a significant benefit of financing the transfer of goods or services to the customer.

Indefeasible right of use ("IRU") contracts of the Group is adjusted for significant financing component. For bundled contracts where the control of equipment is transferred to the customer upfront but collection is made in instalments, no significant financing component is recognized based on materiality considerations.

### n) Income from investing activities and expense from investing activities

Income from investing activities is comprised of incomes from scrap and property, plant and equipment sales.

Expense from investing activities is comprised of loss on sales of property, plant and equipment sales.

### o) Financial income and financial expenses

The Group's finance income and finance costs include:

- interest income;
- interest expense;
- transaction cost;
- coupon payments of bond;
- gains and losses on hedging instruments recognized in profit or loss;
- foreign currency gains or losses on financial assets and financial liabilities.

Interest income or expense is recognized using the effective interest method. The 'effective interest rate' is the rate that exactly discounts estimated future cash payments or receipts through the expected life of the financial instrument to:

- the gross carrying amount of the financial asset, or
- the amortized cost of the financial liability.

In calculating interest income and expense, the effective interest rate is applied to the gross carrying amount of the asset (when the asset is not credit-impaired) or to the amortized cost of the liability.

## 2. BASIS OF PRESENTATION OF FINANCIAL STATEMENTS (CONTINUED)

### 2.3 Summary of significant accounting policies (continued)

### o) Financial income and financial expenses (continued)

However, for financial assets that have become credit-impaired subsequent to initial recognition, interest income is calculated by applying the effective interest rate to the amortized cost of the financial asset. If the asset is no longer credit-impaired, then the calculation of interest income reverts to the gross basis.

Borrowing costs that cannot be matched with acquisition, construction or production of an asset are recognized in profit or loss by using effective interest rate.

Rediscount, interest and foreign exchange gains and losses arising from trading transactions are recognized in other operating income and expense.

Accounting for significant financing component is disclosed in detail in Note 2.4.(m).

### p) Earnings per share

Earnings per share is calculated by dividing the consolidated profit/(loss) for the period attributable to ordinary shareholders by the weighted average number of ordinary shares outstanding during the period.

### r) Taxes

Income tax expense is comprised of current and deferred tax. Income tax expense is recognized in the consolidated statement of profit / (loss) except to the extent that it relates to a business combination or items recognized directly in equity or other comprehensive income.

***i) Current tax***

Current tax is comprised of the expected tax payable or receivable on the taxable income or loss for the year and any adjustment to tax payable or receivable in respect of previous years. It is measured using tax rates enacted or substantively enacted at the reporting date. Current tax also includes any tax arising from dividends. Prepaid corporation taxes and corporate tax liabilities are offset when they relate to income taxes levied by the same taxation authority.

Turkish tax legislation does not permit a parent company and its subsidiary to file a consolidated tax return. Therefore, provisions for taxes, as reflected in the consolidated financial statements, have been calculated on a separate-entity basis.

***ii) Deferred tax***

Deferred tax is recognized on temporary differences between the carrying amounts of assets and liabilities in the financial statements and the corresponding tax bases used in the computation of taxable profit and are accounted for using the liability method. Deferred tax liabilities are generally recognized for all taxable temporary differences and deferred tax assets are recognized to the extent that it is probable that taxable profits will be available against which deductible temporary differences can be utilized.

Deferred tax is not recognized for:

• Temporary differences on the initial recognition of assets or liabilities in a transaction that is not a business combination and that affects neither accounting nor taxable profit and loss;

• Temporary differences related to investments in subsidiaries, associates and joint arrangements to the extent that the Group's able to control the timing of the reversal of the temporary differences and it is probable that they will not reverse in the foreseeable future; and

• Taxable temporary differences arising on the initial recognition of goodwill.

## 2 BASIS OF PRESENTATION OF FINANCIAL STATEMENTS (CONTINUED)

### 2.3 Summary of significant accounting policies (continued)

### r) Taxes (continued)

#### *ii) Deferred tax (continued)*

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

The Company and the other consolidated subsidiaries have reflected their deferred tax asset and liabilities by netting their individual balances; however, there is no netting on a consolidation basis. Deferred tax is calculated at the tax rates that are expected to apply in the period when the liability is settled or the asset realized.

Deferred tax assets are recognized for unused tax loses, unused tax credits a deductible temporary differences to the extent that it is possible that future taxable profits will be available against which they can be used. Deferred tax assets are reviewed at each reporting date and are reduced to the extent that it is no longer probable that the related tax benefit will be realized.

The Group has revalued certain tangible assets in its financial statements prepared in accordance with the Tax Procedure Law, in accordance with the provisions of the Law No. 7326 on the revaluation of immovables and other depreciable assets. As a result of the revaluation, the increases on revaluation of immovables and other depreciable assets are accounted for in a special fund account under shareholders' equity in the financial statements prepared in accordance with the Tax Procedure Law. Since the related revaluation increases are an inflation adjustment in substance, revaluation increases have not been accounted in the financial statements prepared in accordance with TFRS. The deferred tax calculated on the temporary differences resulting from this adjustment has been recognized in profit and loss.

#### *iii) Tax exposures*

In determining the amount of current and deferred tax the Group considers the impact of uncertain tax positions and whether additional taxes and interest may be due. This assessment relies on estimates and assumptions and may involve a series of judgments about future events. New information may become available that causes the Group to change its judgment regarding the adequacy of existing tax liabilities; such changes to tax liabilities will impact tax expense in the period that such a determination is made.

The Group believes that its accruals for tax liabilities are adequate for all open tax years based on its assessment of many factors, including interpretations of tax law and prior experience.

### s) Segment reporting

An operating segment is a component of the Group that engages in business activities from which it may earn revenues and incur expenses, including revenues and expenses that relate to transactions with any of the Group's other components. All operating segments' operating results are reviewed regularly by the Group's Board of Directors to make decisions about resources to be allocated to the segment and assess its performance, and for which discrete financial information is available.

### t) Determination of fair values

A number of the Group's accounting policies and disclosures require the determination of fair value, for both financial and non-financial assets and liabilities. Fair values have been determined for measurement and/or disclosure purposes based on the following methods. When applicable, further information about the assumptions made in determining fair values is disclosed in the notes specific to that asset or liability.

## 2 BASIS OF PRESENTATION OF FINANCIAL STATEMENTS (CONTINUED)

### 2.3 Summary of significant accounting policies (continued)

### t) Determination of fair values (continued)

***i) Trade and other receivables***

The fair value of trade and other receivables is estimated as the present value of future cash flows discounted at the market rate of interest at the reporting date. Short-term receivables with no stated interest rate are measured at the original invoice amount if the effect of discounting is immaterial. This fair value is determined at initial recognition and at the end of each reporting period for disclosure purposes.

***ii) Derivatives***

The fair value of interest rate swaps and forward exchange contracts are based on broker quotes. Those quotes are tested for reasonableness by discounting estimated future cash flows based on the terms and maturity of each contract and using market interest rates for a similar instrument at the measurement date. Fair values reflect the credit risk of the instrument and include adjustments to take account of the credit risk of the Group entity and counterparty when appropriate.

***iii) Issued debt instruments***

The fair values of issued debt instruments are measured by using quoted market price at the date of valuation.

***iv) Other non-derivative financial liabilities***

Other non-derivative financial liabilities are measured at fair value, at initial recognition and for disclosure purposes, at each annual reporting date. Fair value is calculated based on the present value of future principal and interest cash flows, discounted at the market rate of interest at the measurement date.

***v) Lands***

Lands accounted as property, plant and equipment are measured at revalued amount. Revalued amount for lands is the fair value at the date of the revaluation less any subsequent accumulated depreciation and subsequent accumulated impairment losses.

**Standards issued but not yet effective and not early adopted as of 31 December 2021**

**The new standards, amendments and interpretations**

The accounting policies adopted in preparation of the consolidated financial statements as of December 31, 2021 are consistent with those of the previous financial year, except for the adoption of new and amended TFRS and TFRS interpretations effective as of January 1, 2021 and thereafter. The effects of these standards and interpretations on the Group's financial position and performance have been disclosed in the related paragraphs.

**i) The new standards, amendments and interpretations which are effective as of January 1, 2021 are as follows:**

**Interest Rate Benchmark Reform – Phase 2 – Amendments to TFRS 9, TAS 39, TFRS 7, TFRS 4 and TFRS 16**

In December 2020, the POA issued Interest Rate Benchmark Reform – Phase 2, Amendments to TFRS 9, TAS 39, TFRS 7, TFRS 4 and TFRS 16 to provide temporary reliefs which address the financial reporting effects when an interbank offering rate (IBOR) is replaced with an alternative nearly risk-free rate (RFR), amending the followings. The amendments are effective for periods beginning on or after 1 January 2021. Earlier application is permitted and must be disclosed.

## 2 BASIS OF PRESENTATION OF FINANCIAL STATEMENTS (CONTINUED)

### 2.3 Summary of significant accounting policies (continued)

### i) The new standards, amendments and interpretations which are effective as of January 1, 2021 are as follows (continued):

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

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

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

***Relief from discontinuing hedging relationships***

- The amendments permit changes required by IBOR reform to be made to hedge designations and hedge documentation without the hedging relationship being discontinued.
- Amounts accumulated in the cash flow hedge reserve are deemed to be based on the RFR.
- For the TAS 39 assessment of retrospective hedge effectiveness, on transition to an RFR, entities may elect on a hedge-by-hedge basis, to reset the cumulative fair value changes to zero.
- The amendments provide relief for items within a designated group of items (such as those forming part of a macro cash flow hedging strategy) that are amended for modifications directly required by IBOR reform. The reliefs allow the hedging strategy to remain and not be discontinued.
- As instruments transition to RFRs, a hedging relationship may need to be modified more than once. The phase two reliefs apply each time a hedging relationship is modified as a direct result of IBOR reform.

***Separately identifiable risk components***

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

## 2 BASIS OF PRESENTATION OF FINANCIAL STATEMENTS (CONTINUED)

### 2.3 Summary of significant accounting policies (continued)

#### i) The new standards, amendments and interpretations which are effective as of January 1, 2021 are as follows (continued)

***Additional disclosures***

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

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

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

As of 31 December 2021, the variable rate derivative and non-derivative financial instruments owned by the Group consist of loans, Eurobonds and bonds. As of 31 December 2021, the interest rates applicable to existing financial instruments have not changed as a result of the IBOR reform.

**Amendments to IFRS 16 - Covid-19-Related Rent Concessions and Covid-19-Related Rent Concessions beyond 30 June 2021**

In June 2020, the POA issued amendments to TFRS 16 Leases to provide relief to lessees from applying TFRS 16 guidance on lease modifications to rent concessions arising a direct consequence of the Covid-19 pandemic. On April 7, 2021, POA extended the exemption to include concessions that cause a decrease in lease payments whose maturity expired on or before June 30, 2022.

A lessee will apply the amendment for annual reporting periods beginning on or after 1 April 2021. Early application of the amendments is permitted. The Group is in the process of assessing the impact of the amendments on financial position or performance of the Group.

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

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

**Amendments to TFRS 10 and TAS 28: Sale or Contribution of Assets between an Investor and its Associate or Joint Venture**

In December 2017, POA postponed the effective date of this amendment indefinitely pending the outcome of its research project on the equity method of accounting. Early application of the amendments is still permitted. The Group will wait until the final amendment to assess the impacts of the changes.

## 2 BASIS OF PRESENTATION OF FINANCIAL STATEMENTS (CONTINUED)

### 2.3 Summary of significant accounting policies (continued)

#### ii) Standards issued but not yet effective and not early adopted (continued)

**Amendments to TFRS 3 – Reference to the Conceptual Framework**

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

The Group is in the process of assessing the impact of the amendments on financial position or performance of the Group.

**Amendments to TAS 16 – Proceeds before intended use**

In July 2020, the POA issued amendments to TAS 16 Property, plant and equipment. The amendment prohibits entities from deducting from the cost of an item of property, plant and equipment (PP&E), any proceeds of the sale of items produced while bringing that asset to the location and condition necessary for it to be capable of operating in the manner intended by management. Instead, an entity recognizes the proceeds from selling such items, and costs of producing those items, in profit or loss. The amendments issued to TAS 16 which are effective for periods beginning on or after 1 January 2022. Amendments must be applied retrospectively only to items of PP&E made available for use on or after beginning of the earliest period presented when the entity first applies the amendment. There is no transition relief for the first time adopters.

The Group is in the process of assessing the impact of the amendments on financial position or performance of the Group.

**Amendments to TAS 37 – Onerous contracts – Costs of Fulfilling a Contract**

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

The Group is in the process of assessing the impact of the amendments on financial position or performance of the Group.

## 2 BASIS OF PRESENTATION OF FINANCIAL STATEMENTS (CONTINUED)

### 2.3 Summary of significant accounting policies (continued)

#### ii) Standards issued but not yet effective and not early adopted (continued)

**TFRS 17 - The new Standard for insurance contracts**

The POA issued TFRS 17 in February 2019, a comprehensive new accounting standard for insurance contracts covering recognition and measurement, presentation and disclosure. TFRS 17 model combines a current balance sheet measurement of insurance contract liabilities with the recognition of profit over the period that services are provided. TFRS 17 will become effective for annual reporting periods beginning on or after 1 January 2023; early application is permitted. The standard is not applicable for the Group and will not have an impact on the financial position or performance of the Group.

**Amendments to TAS 1- Classification of Liabilities as Current and Non-Current Liabilities**

On January 15, 2021, the POA issued amendments to "TAS 1 Presentation of Financial Statements". The amendments issued to TAS 1 which are effective for periods beginning on or after 1 January 2023, clarify the criteria for the classification of a liability as either current or non-current. Amendments must be applied retrospectively in accordance with "*TAS 8 Accounting Policies, Changes in Accounting Estimates and Errors*". Early application is permitted.

The Group is in the process of assessing the impact of the amendments on financial position or performance of the Group.

**Amendments to TAS 8 - Definition of Accounting Estimates**

In August 2021, the POA issued amendments to TAS 8, in which it introduces a new definition of 'accounting estimates'. The amendments issued to TAS 8 are effective for annual periods beginning on or after 1 January 2023. The amendments clarify the distinction between changes in accounting estimates and changes in accounting policies and the correction of errors. Also, the amended standard clarifies that the effects on an accounting estimate of a change in an input or a change in a measurement technique are changes in accounting estimates if they do not result from the correction of prior period errors. The previous definition of a change in accounting estimate specified that changes in accounting estimates may result from new information or new developments. Therefore, such changes are not corrections of errors. This aspect of the definition was retained by the POA. The amendments apply to changes in accounting policies and changes in accounting estimates that occur on or after the start of the effective date. Earlier application is permitted.

Overall, the Group expects no significant impact on its balance sheet and equity.

**Amendments to TAS 1 - Disclosure of Accounting Policies**

In August 2021, the POA issued amendments to TAS 1, in which it provides guidance and examples to help entities apply materiality judgements to accounting policy disclosures. The amendments issued to TAS 1 are effective for annual periods beginning on or after 1 January 2023. In the absence of a definition of the term 'significant' in TFRS, the POA decided to replace it with 'material' in the context of disclosing accounting policy information. 'Material' is a defined term in TFRS and is widely understood by the users of financial statements, according to the POA. In assessing the materiality of accounting policy information, entities need to consider both the size of the transactions, other events or conditions and the nature of them. Examples of circumstances in which an entity is likely to consider accounting policy information to be material have been added.

Overall, the Group expects no significant impact on its balance sheet and equity.

## 2 BASIS OF PRESENTATION OF FINANCIAL STATEMENTS (CONTINUED)

### 2.3 Summary of significant accounting policies (continued)

#### ii) Standards issued but not yet effective and not early adopted (continued)

**Amendments to TAS 12 – Deferred Tax related to Assets and Liabilities arising from a Single Transaction**

In August 2021, the POA issued amendments to TAS 12, which narrow the scope of the initial recognition exception under TAS 12, so that it no longer applies to transactions that give rise to equal taxable and deductible temporary differences. The amendments issued to TAS 12 are effective for annual periods beginning on or after 1 January 2023. The amendments clarify that where payments that settle a liability are deductible for tax purposes, it is a matter of judgement (having considered the applicable tax law) whether such deductions are attributable for tax purposes to the liability recognised in the financial statements (and interest expense) or to the related asset component (and interest expense). This judgement is important in determining whether any temporary differences exist on initial recognition of the asset and liability. The amendments apply to transactions that occur on or after the beginning of the earliest comparative period presented. In addition, at the beginning of the earliest comparative period presented, a deferred tax asset (provided that sufficient taxable profit is available) and a deferred tax liability for all deductible and taxable temporary differences associated with leases and decommissioning obligations should be recognized.

The Group is in the process of assessing the impact of the amendments on financial position or performance of the Group.

**Annual Improvements – 2018–2020 Cycle**

In July 2020, the POA issued Annual Improvements to TFRS Standards 2018–2020 Cycle, amending the followings:

- *TFRS 1 First-time Adoption of International Financial Reporting Standards – Subsidiary as a first-time adopter:* The amendment permits a subsidiary to measure cumulative translation differences using the amounts reported by the parent. The amendment is also applied to an associate or joint venture.
- *TFRS 9 Financial Instruments – Fees in the "10 per cent test" for derecognition of financial liabilities:* The amendment clarifies the fees that an entity includes when assessing whether the terms of a new or modified financial liability are substantially different from the terms of the original financial liability. These fees include only those paid or received between the borrower and the lender, including fees paid or received by either borrower or lender on the other's behalf.
- *TAS 41 Agriculture – Taxation in fair value measurements:* The amendment removes the requirement in paragraph 22 of TAS 41 that entities exclude cash flows for taxation when measuring fair value of assets within the scope of TAS 41.

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

The Group is in the process of assessing the impact of the amendments / improvements on financial position or performance of the Group.

## 2 BASIS OF PRESENTATION OF FINANCIAL STATEMENTS (CONTINUED)

### 2.4 Significant accounting assessments, estimates and assumptions

In the process of applying the Group's accounting policies, the management has made the following judgments that have the most significant effect on the amounts recognized in the consolidated financial statements (excluding those involving estimations):

*i*) *Income from Sales Campaign:* Group makes sales campaigns with suppliers under which they bundle telecommunication services with equipment supplied by the suppliers. The Group management accounts bundled offers as an agent if the sale transaction satisfies the below conditions:

- Group has no inventory risk.
- Group has no responsibility on technical qualifications of equipment delivered to customers and responsibility after sale belongs to supplier.
- Group does not make any modification on the equipment.
- Group earns either a fixed rate of commission or zero profit on the transaction.
- Group is not the main contractor in device sales,
- Group has no control over device sales prices,

*ii) Prepaid Card Sales Agent - Principal Analysis:* Since TT Mobil is primarily responsible for providing the service, has credit and inventory risk and determinant in setting prices; starting from April 2010, TT Mobil recognizes prepaid card incomes on a gross basis.

*iii*) *Commission income*: The Group renders intermediary collection services regarding handsets sold by the distributors at the Group exclusive sale channels. Accordingly, the arrangement with the customer includes both handset principal amount and GSM services. Total considerations have been collected from the customers with up to 24 month instalments via GSM bills where each benefit is clearly identifiable and separable. The Group does not recognize any revenues from the sale of handsets and acts as an agent since it has no control over price, nor risk on stock. However, the collection risk of handset principal amount is on the Group and the distributors collect this amount from the Group on monthly basis. Apart from the GSM revenues, since customer base and sales channels are made available to the distributors, the Group charges a commission to those distributors. This commission income is classified under other revenues and it is recognized when the handset is delivered to the customer.

*iv*) *Content Sales*: Since TT Mobil is primarily responsible for providing the service, has credit and determinant in setting prices; TT Mobil recognizes content revenues on a gross basis.

*v) Liabilities within the scope of vendor financing:* For capital expenditures, the Group carries out vendor financing with some of its suppliers in accordance with the agreements made with banks and those suppliers. Since the terms are not substantially different with the discounted present value of the cash flows under the new terms of the liabilities, the Group continues to classify those liabilities as trade payables.

*vi) Copper cable disposals:*The Group recognises disposal cost of copper cable in profit or loss corresponding to 26% of the caryying values of the converted copper infrastructure during the fiber conversion process.

## 2. BASIS OF PRESENTATION OF FINANCIAL STATEMENTS (CONTINUED)

### 2.4 Significant accounting assessments, estimates and assumptions (continued)

**Key sources of estimation uncertainty**

The key assumptions concerning the future, and other key sources of estimation uncertainty at the balance sheet date, that have a significant risk of causing a material adjustment to the carrying amounts of assets and liabilities within the next financial year, are discussed below:

The Group determines whether property, plant and equipment are impaired by estimating the recoverable amount of the assets whenever there is an indication of impairment. This requires an estimation of the value in use of the cash-generating units. Estimating the value in use requires the Group to make an estimate of the expected future cash flows from the cash-generating unit and also to choose a suitable discount rate in order to calculate the present value of those cash flows (Note 16).

The estimates used by the Group in the application of TFRS Interpretation 12 are as follows:

a) The Company assesses that approximately 30% of the foreseen network investments related to the replacement of the network equipment which are reclassified to intangible assets and which are then recognized in the financial statements as intangible assets are the contractual replacements as required by the concession agreement. The Group has provided a provision amounting to TL 10.627 (31 December 2020: TL 8.506) (Note 21) in the consolidated financial statements for the foreseen contractual replacements in the future. Aforementioned provision is the present value of the contractual replacement expenses as of 31 December 2021 that will be realized in the future. Discount rate used in the provision calculation is determined as 16,6% (31 December 2020: 17,0%).

b) In accordance with TFRS Interpretation 12, the Company has determined the cost of the investments in intangible assets recognized under the scope of TFRS Interpretation 12 by adding the profit margin, which is applied in the market for similar construction services, to the cost of acquiring the related network equipment. The estimated profit margin used in construction services provided in exchange for concession right is 13% (31 December 2020: 13%) for the year ended as of 31 December 2021. The profit margin of property, plant and equipment accounted within the scope of TFRS Interpretation 12 amounting to TL 2.571.246 (31 December 2020: TL 1.846.539) (Note 20) is TL 295.807 for the year ended as of 31 December 2021 (31 December 2020: TL 212.258) (Note 3).

- A deferred tax asset is recognized only to the extent that it is probable that a tax benefit will be realized in the future. If it is probable that a tax benefit will be realized, a deferred tax asset is recognized on unused tax losses, unused tax credits and other deductible temporary differences. Every year, the Group re-assesses its tax loss carry forwards and if there is a material change in the deferred tax asset recognized in the consolidated financial statements, the deferred tax assets are also changed (Note 11).

c) Assumptions used in the impairment test of property, plant and equipment and intangible assets have been explained in Note 16.

## 2. BASIS OF PRESENTATION OF FINANCIAL STATEMENTS (CONTINUED)

### 2.4 Significant accounting assessments, estimates and assumptions (continued)

**Key sources of estimation uncertainty (continued)**

- For trade receivables, other receivables, other assets and contract assets the Group applies the simplified approach to providing for expected credit losses prescribed in TFRS 9, which requires the use of the lifetime expected loss provision for all trade receivables. The Group performed the calculation of ECL rates separately for individual, corporate, public and wholesale customers. The ECLs were calculated based on actual credit loss experience over the past years. Exposures within each group were segmented based on common credit risk characteristics such as delinquency status. Actual credit loss experience was adjusted to reflect differences between economic conditions during the period over which the historical data was collected, current conditions and the Group's view of economic conditions over the expected lives of the receivables. Future collection performance of receivables is estimated by considering general economic conditions to incorporate forward looking information to the expected credit loss calculations.

Assumptions used by Company in goodwill impairment test are explained in Note 16. The Group determines the useful life of an asset by considering its future economic benefits. This evaluation is driven by the Group's previous experience on similar assets. The Group also considers useful life of the asset from technical and commercial perspectives due to changes and developments in market in order to assess whether additional impairment is required or not.

There are other estimations made by the management during the determination of provisions for litigations (Note 24).

### 2.5 Comparative information and reclassification of prior period consolidated financial statements

The Group's consolidated financial statements are presented together with the comparatives for the previous year enabling comparison of the financial condition and performance trends. Where necessary, comparative figures of the financial statements have been reclassified to conform to changes in presentation of the current period financial statements. The Group management considered that it is appropriate to have such reclassifications when they provide more relevant information to users of the financial statements.

As of 31 December 2020, the Group reclassified TFRS 15 contract assets amounting to TL 902.616 and TL 77.130, which were accounted under short-term trade receivables and long-term trade receivables, into short-term Contract assets and long-term Contract assets accounts, respectively.

As of 31 December 2020, the Group reclassified the amortization expenses of the assets capitalized within the scope of TFRS Interpretation 12, amounting to TL 599,183, which was accounted under the marketing, sales and distribution expenses account, to the cost of sales account.

The Group has reclassified TFRS 15 contract liabilities of TL 136.445 and TL 102.498, which were accounted under other non-current liabilities and other current liabilities as of 31 December 2020, to contract liabilities account.

## 3. SEGMENT REPORTING

The Group has two main segments; fixed line and mobile. Fixed line services are provided by Türk Telekom, TTNet, Argela, Innova, Sebit, AssisTT, TTES, TT Venture, TT Destek Hizmetleri and TTINT Group whereas mobile service is provided by TT Mobil. Group management assesses segment performance over earnings before interest, tax, depreciation and amortization ("Adjusted EBITDA"). Adjusted EBITDA is calculated by adjusting the operating income by i) adding income/expense from investing activities, depreciation, amortization and impairment expenses and ii) deducting exchange gains/losses, interest and rediscount income/ expenses on current accounts presented in other operating income and expense. Group management uses adjusted EBITDA as it is comparable with other companies in the sector. EBITDA is not a measure of financial performance indicator defined in TFRS and may not be comparable to similar indicators defined by other companies. As Group management does not monitor Group's performance over geographical segments, geographical segment reporting is not presented. The segment results and balance sheet items are presented below:

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 3. SEGMENT REPORTING (CONTINUED)

| | Fixed line | | Mobile | | Intra-group eliminations and consolidated adjustments | | Consolidated | |
|---|---|---|---|---|---|---|---|---|
| | **1 January - 31 December 2021** | **1 January - 31 December 2020** | **1 January - 31 December 2021** | **1 January - 31 December 2020** | **1 January -31 December 2021** | **1 January - 31 December 2020** | **1 January - 31 December 2021** | **1 January - 31 December 2020** |
| Revenue (*) | 25.270.763 | 20.554.774 | 11.526.324 | 9.902.043 | (2.524.153) | (2.167.942) | 34.272.934 | 28.288.875 |
| International revenue | 2.004.470 | 1.471.029 | – | – | – | – | 2.004.470 | 1.471.029 |
| Contributed revenue (**) | 22.797.215 | 18.432.126 | 11.475.719 | 9.856.749 | – | – | 34.272.934 | 28.288.875 |
| EBITDA | 12.852.215 | 10.455.268 | 3.581.936 | 2.838.071 | (19.022) | (56.427) | 16.415.129 | 13.236.912 |
| Contributed adjusted EBITDA (***) | 11.423.383 | 8.987.131 | 4.991.746 | 4.249.781 | – | – | 16.415.129 | 13.236.912 |
| Capital expenditure (****) | 6.342.797 | 4.498.761 | 2.484.772 | 2.257.243 | (22.856) | (17.045) | 8.804.713 | 6.738.959 |
| Impairments losses, net | (172.325) | (291.529) | (47.915) | (50.731) | – | – | (220.240) | (342.260) |
| Depreciation and amortization | (3.471.892) | (2.913.602) | (2.697.433) | (2.405.390) | – | – | (6.169.325) | (5.318.992) |

(*) "Revenue" includes international revenue.

(**) "Contributed revenue" represents operating segments' revenues from companies other than those included in the consolidated financial statements. Group management still monitors financial performance of the segments based on their separate financial statements and because of this there is no change at the segment information disclosed. However, contribution of operating segments on the Group's revenue is presented to give additional information to the readers of the financial statements.

(***) "Contributed EBITDA" represents operating segments' EBITDA arose from transactions with companies other than those included in the consolidated financial statements and revised by allocation of intra-group charges for shared costs. Group management still monitors financial performance of the segments based on their separate financial statements and because of this there is no change at the segment information disclosed. However, contribution of operating segments on the Group's revenue is presented to give additional information to the readers of the financial statements.

(****) Capital expenditures do not include TL 295.807 (31 December 2020: TL 212.258) amounted profit margin which is capitalized on intangible assets that are accounted within the scope of TFRS Interpretation 12.

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 3. SEGMENT REPORTING (CONTINUED)

| | 1 January - 31 December 2021 | 1 January - 31 December 2020 |
|---|---|---|
| Fixed line contributed EBITDA | 11.423.383 | 8.987.131 |
| Mobile contributed EBITDA | 4.991.746 | 4.249.781 |
| **EBITDA** | **16.415.129** | **13.236.912** |
| Foreign exchange gains, interest income, discount income on current accounts presented in other operating income | 261.406 | 143.508 |
| Foreign exchange losses, interest income, discount income on current accounts presented in other operating expense (-) | (1.422.942) | (442.426) |
| Financial income | 5.015.420 | 998.337 |
| Financial expense (-) | (8.445.964) | (4.759.106) |
| Depreciation, amortization and impairment | (6.202.207) | (5.375.284) |
| **Consolidated profit before tax** | **5.620.842** | **3.801.941** |

| 31 December 2021 | Fixed Line | Mobile | Eliminations | Consolidated |
|---|---|---|---|---|
| Total segment assets | 44.381.665 | 15.362.791 | (1.406.821) | 58.337.635 |
| Total segment liabilities | (39.679.923) | (5.814.629) | 1.406.821 | (44.087.731) |
| Goodwill | 15.250 | 29.694 | − | 44.944 |
| Assets held for sale | 19.057 | 37.361 | − | 56.418 |

| 31 December 2020 | Fixed Line | Mobile | Eliminations | Consolidated |
|---|---|---|---|---|
| Total segment assets | 33.734.650 | 12.019.457 | (1.031.587) | 44.722.520 |
| Total segment liabilities | (29.152.082) | (4.564.649) | 1.031.587 | (32.685.144) |
| Goodwill | 15.250 | 29.694 | − | 44.944 |
| Assets held for sale | − | 37.361 | − | 37.361 |

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 4. CASH AND CASH EQUIVALENTS

| | 31 December 2021 | 31 December 2020 |
|---|---|---|
| Cash on hand | 519 | 301 |
| Cash at banks– demand deposit | 933.296 | 747.659 |
| Cash at banks– time deposit | 6.763.055 | 4.259.967 |
| | **7.696.870** | **5.007.927** |

As of 31 December 2021, time deposits are all short-term, maturing within one month and denominated in both foreign currencies and TL. The interest rates are between 5,50% and 20% for TL deposits, between 0,20% and 1,50% for USD deposits and between 0,25% and 0,65% for EUR deposits (31 December 2020: for TL deposits between 5,50% and 18,75%, for USD deposits between 0,05% and 3,30%, for EUR deposits between 0,85% and 2,90%).

Reconciliation of cash and cash equivalents to the statement of cash flows is as follows:

| | 31 December 2021 | 31 December 2020 |
|---|---|---|
| Cash and cash equivalents | 7.696.870 | 5.007.927 |
| Less: restricted amounts | | |
| - Collection protocols and ATM collection | (417.731) | (362.378) |
| - Other | (934.254) | (275.432) |
| **Unrestricted cash** | **6.344.885** | **4.370.117** |

The Group classifies blocked cash amounts under cash and cash equivalents as they are easily convertible into cash and highly liquid assets that are not exposed to impairment loss.

As of 31 December 2021, demand deposits amounting to TL 417.731 is restricted due to collection protocols signed with banks for receipts from the subscribers, under which proceeds are made available to the Group a certain number of days after the cash is collected. As of 31 December 2021, other restricted amounts consist of blocked deposits related to Group's derivative financial instruments.

As of 31 December 2021, the Group maintains available credit line amounting to USD 90.000 until 30 March 2022 and USD 27.000 until 30 March 2023 which in total amounted to USD 117.000.

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 5. FINANCIAL LIABILITIES

### *Bank borrowings*

| | 31 December 2021 | | | 31 December 2020 | | |
|---|---|---|---|---|---|---|
| | **Weighted average nominal interest rate (%)** | **Original amount** | **TL equivalent** | **Weighted average nominal interest rate (%)** | **Original amount** | **TL equivalent** |
| **Short-term bank loans:** | | | | | | |
| Unsecured TL bank loans with fixed interest rates | 16,37 | 180.635 | 180.635 | 9,76 | 2.631.145 | 2.631.145 |
| Unsecured EUR bank borrowings with fixed interest rates | 1,45 | 41.000 | 618.555 | – | – | – |
| Unsecured Yuan bank borrowings with variable interest rates | – | – | – | 4,27 | 43.986 | 49.185 |
| **Interest accruals:** | | | | | | |
| Unsecured TL bank loans with fixed interest rates | | 1.531 | 1.531 | | 102.016 | 102.016 |
| Unsecured EUR bank loans with fixed interest rates | | 96 | 1.445 | | – | – |
| Unsecured Yuan bank borrowings with variable interest rates | | – | – | | 790 | 884 |
| **Short-term bank loans** | | | **802.166** | | | **2.783.230** |
| **Short-term portion of long-term bank loans:** | | | | | | |
| Unsecured USD bank loans with variable interest rates(*) | 2,20 | 292.332 | 3.896.498 | 2,22 | 255.884 | 1.878.316 |
| Unsecured EUR bank loans with variable interest rates (**) | 0,87 | 95.501 | 1.440.800 | 0,89 | 99.624 | 897.406 |
| **Interest accruals of long-term bank loans:** | | | | | | |
| Unsecured USD bank loans with variable interest rates (*) | | 2.452 | 32.678 | | 3.048 | 22.376 |
| Unsecured EUR bank loans with variable interest rates (**) | | 291 | 4.386 | | 430 | 3.874 |
| **Current portion of long-term bank loans** | | | **5.374.362** | | | **2.801.972** |
| **Total short-term bank loans** | | | **6.176.528** | | | **5.585.202** |
| **Long-term bank loans:** | | | | | | |
| Unsecured USD bank loans with variable interest rates (*) | 2,20 | 369.280 | 4.922.130 | 2,22 | 508.061 | 3.729.425 |
| Unsecured EUR bank loans with variable interest rates (**) | 0,87 | 265.447 | 4.004.721 | 0,89 | 338.137 | 3.045.902 |
| **Total long-term bank loans** | | | **8.926.851** | | | **6.775.327** |
| **Total bank loans** | | | **15.103.379** | | | **12.360.529** |

(*) As at 31 December 2021, interest rate varies between Libor + 0,54% and 2,85% (31 December 2020: Libor + 0,54% and 2,85%).
(**) As at 31 December 2021, interest rate varies between Euribor + 0,25% and 2,00% (31 December 2020: Euribor + 0,25% and 2,00%).

The current period movements of bank loans are disclosed in Note 25.

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 5. FINANCIAL LIABILITIES (CONTINUED)

### *Bank borrowings (continued)*

The contractual maturities of bank loans in equivalent of TL are as follows:

| | 31 December 2021 | | | | | | 31 December 2020 | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | **Up to 3 months** | **3 months to 1 year** | **1 year to 2 years** | **2 years to 5 years** | **More than 5 years** | **Total** | **Up to 3 months** | **3 months to 1 year** | **1 year to 2 years** | **2 years to 5 years** | **More than 5 years** | **Total** |
| Unsecured TL bank borrowings with fixed interest rates | 178.152 | 4.014 | – | – | – | 182.166 | 1.307.745 | 1.425.416 | – | – | – | 2.733.161 |
| Unsecured USD bank borrowings with variable interest rates | 125.436 | 3.803.740 | 1.433.576 | 3.272.751 | 215.803 | 8.851.306 | 805.564 | 1.095.128 | 2.088.376 | 1.616.581 | 24.468 | 5.630.117 |
| Unsecured EUR bank borrowings with fixed interest rates | 1.419 | 618.581 | – | – | – | 620.000 | – | – | – | – | – | – |
| Unsecured EUR bank borrowings with variable interest rates | 59.836 | 1.385.350 | 1.145.840 | 2.493.548 | 365.333 | 5.449.907 | 36.104 | 865.176 | 829.850 | 1.937.276 | 278.776 | 3.947.182 |
| Unsecured Yuan bank borrowings with variable interest rates | – | – | – | – | – | – | 850 | 49.219 | – | – | – | 50.069 |
| | **364.843** | **5.811.685** | **2.579.416** | **5.766.299** | **581.136** | **15.103.379** | **2.150.263** | **3.434.939** | **2.918.226** | **3.553.857** | **303.244** | **12.360.529** |

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 5. FINANCIAL LIABILITIES (CONTINUED)

### *Issued debt instruments*

| | 31 December 2021 | | | 31 December 2020 | | |
|---|---|---|---|---|---|---|
| | Weighted average nominal interest rate (%) | Original amount | TL equivalent | Weighted average nominal interest rate (%) | Original amount | TL equivalent |
| **Short-term portion of long-term issued debt instruments:** | | | | | | |
| TL issued debt instruments with variable interest rates | 15,97 | 150.000 | 150.000 | – | – | – |
| **Interest accruals of short-term portion of long-term issued debt instruments:** | | | | | | |
| TL issued debt instruments with variable interest rates | | 14.210 | 14.210 | | 1.308 | 1.308 |
| USD issued debt instruments with fixed interest rates | | 14.043 | 187.177 | | 13.146 | 96.500 |
| **Short-term issued debt instruments** | | | **351.387** | | | **97.808** |
| **Long-term issued debt instruments:** | | | | | | |
| TL issued debt instruments with variable interest rates | – | – | – | 17,44 | 149.711 | 149.711 |
| USD issued debt instruments with fixed interest rates | 5,88 | 968.501 | 12.909.151 | 5,88 | 992.965 | 7.288.858 |
| **Long-term issued debt instruments** | | | **12.909.151** | | | **7.438.569** |
| **Total issued debt instruments** | | | **13.260.538** | | | **7.536.377** |

The current period movements of issued debt instruments are disclosed in Note 25.

The sales process of the bond issuances amounted to USD 500.000 with 6 years of maturity, and 6,875% coupon rate based on 7% reoffer yield was completed on February 28th, 2019. The bonds are now quoted at Irish Stock Exchange.

The sales process of the bond issuances amounted to USD 500.000 with 10 years of maturity, and 4,875% coupon rate based on 4,982% reoffer yield was completed on June 19th, 2014. The bonds are now quoted at Irish Stock Exchange. The part of the bond amounting to USD 20.000 was repurchased between 5th - 14th February 2019 and was netted off from the total bond amount according to its fair value.

The sales processes of the bond issuances amounted to TL 150.000 with 402-day of maturity and interest rate 1,75% over the BIST TL overnight interest rate (TLREF Index) was completed on December 14th, 2020. The issuance was advised by Ak Yatırım Menkul Değerler A.Ş.

The contractual maturities of issued long term bills, bonds and notes in equivalent of TL are as follows:

| | 31 December 2021 | | | | | 31 December 2020 | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | Up to 3 months | 3 months to 1 year | 1 year to 5 years | More than 5 years | Total | Up to 3 months | 3 months to 1 year | 1 year to 5 years | More than 5 years | Total |
| TL issued debt instruments with variable interest rates | 164.210 | – | – | – | 164.210 | 1.308 | – | 149.711 | – | 151.019 |
| USD issued debt instruments with fixed interest rates | 187.177 | – | 12.909.151 | – | 13.096.328 | 96.500 | – | 7.288.858 | – | 7.385.358 |
| | **351.387** | **–** | **12.909.151** | **–** | **13.260.538** | **97.808** | **–** | **7.438.569** | **–** | **7.536.377** |

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 5. FINANCIAL LIABILITIES (CONTINUED)

### *Lease liabilities*

As of 31 December 2021, obligation under leases detail are as follows:

| | | | 31 December 2021 | | 31 December 2020 | |
|---|---|---|---|---|---|---|
| | **Currency** | **Interest rate type** | **Nominal interest rate** | **Carrying amount** | **Nominal interest rate** | **Carrying amount** |
| Lease liabilities | TL | Fixed | 9,0% - 20,0% | 1.271.960 | 9,0% - 20,0% | 1.223.002 |
| Lease liabilities | USD | Fixed | 3,0% - 5,0% | 51.835 | 4,0% - 7,0% | 37.198 |
| Lease liabilities | EUR | Fixed | 2,5% - 4,5% | 113.047 | 2,5% - 4,5% | 75.220 |
| Lease liabilities | Other | Fixed | 3,3% | 2.618 | 3,3% | 2.266 |
| | | | | **1.439.460** | | **1.337.686** |

The current period movements of lease liabilities are disclosed in Note 25.

## 6. TRADE RECEIVABLES AND PAYABLES FROM AND CONTRACT ASSETS TO UNRELATED PARTIES

### *Trade receivables*

| | **31 December 2021** | **31 December 2020** |
|---|---|---|
| **Short-term** | | |
| Receivables from subscribers | 10.032.741 | 8.741.290 |
| Other trade receivables (*) | 442.390 | 297.539 |
| Allowance for doubtful receivables (-) | (3.946.503) | (3.754.151) |
| **Total short-term trade receivables** | **6.528.628** | **5.284.678** |
| **Long-term** | | |
| Receivables from subscribers | 127.851 | 204.132 |
| **Total long-term trade receivables** | **127.851** | **204.132** |

(*) Other trade receivables mainly consist of corporate project receivables.

Trade receivables generally have a maturity term of 60 days on average (31 December 2020: 60 days).

The movement of the allowance for doubtful receivables is as follows:

| | **1 January - 31 December 2021** | **1 January - 31 December 2020** |
|---|---|---|
| On January 1 | (3.754.151) | (3.490.624) |
| Provision for the year, net | (173.323) | (259.769) |
| Change in currency translation differences | (19.029) | (3.758) |
| **On 31 December** | **(3.946.503)** | **(3.754.151)** |

The Group waits up to 90 days before initiating legal action for overdue receivables. Based on its previous collection performance from overdue receivables, the Company expects to make significant collections from its overdue receivables.

Receivables guaranteed of the Group are amounted to TL 224.100.

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 6. TRADE RECEIVABLES AND PAYABLES FROM AND CONTRACT ASSETS TO UNRELATED PARTIES (CONTINUED)

***Contract assets***

| | 31 December 2021 | 31 December 2020 |
|---|---|---|
| **Short-term** | | |
| Contract assets from sale of goods and service contracts | 951.675 | 902.616 |
| | **951.675** | **902.616** |
| **Long-term** | | |
| Contract assets from sale of goods and service contracts | 55.377 | 77.310 |
| | **55.377** | **77.310** |

The contract assets represent contract assets from subscribers. Due to the high volume of subscribers, different billing period are available, an accrual is made at the end of each reporting period to accrue revenue for services rendered but not billed. In addition, income an accrual is made for the not billed of the contributions services.

As of the reporting period, the portion of the accrued income to be invoiced one year later is presented in the long term contract assets.

***Trade payables***

| | 31 December 2021 | 31 December 2020 |
|---|---|---|
| **Short-term** | | |
| Trade payables | 7.065.738 | 4.841.056 |
| Expense accruals | 663.409 | 452.465 |
| **Total short-term trade payables** | **7.729.147** | **5.293.521** |

The average maturity term of trade payables is between 30 and 150 days (31 December 2020: 30 and 150 days).

As of 31 December 2021, short term trade payables consist of payables within scope of supplier finance that amounting TL 999.666 (31 December 2020: TL 1.088.089).

## 7. RIGHT OF USE ASSETS

The carrying amounts of right-of-use assets as of 31 December 2021 are as below:

| | 31 December 2021 | 31 December 2020 |
|---|---|---|
| Site rent | 1.006.892 | 957.992 |
| Vehicles | 331.317 | 333.132 |
| Building | 179.201 | 179.097 |
| Other | 61.483 | 75.934 |
| **Right of use assets** | **1.578.893** | **1.546.155** |

As of 31 December 2021 the Group capitalized TL 835.616 right of use asset (31 December 2020: TL 909.960).

As of 31 December 2021, the Group recognised TL 760.041 of depreciation charges (Site rent: TL 379.454, Building: TL 139.743, Vehicles: TL 156.133 and Other: TL 84.711) (31 December 2020: TL 693.226) and TL 291.854 of financial expense from these leases (31 December 2020: TL 205.179).

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 8. DUE FROM AND DUE TO RELATED PARTIES

All intra-group transactions and balances including intra-group unrealized profits and losses are eliminated for consolidation purposes and are not disclosed in this note.

Institutions under state control are defined as related parties due to 25% ownership and the golden share of the Treasury. State controlled entities are defined as related parties but in accordance with the exemption provided by the TAS 24 disclosure requirements, state controlled entities are excluded from general reporting requirements.

The parent company and controlling party of the Company is LYY Telekomünikasyon A.Ş. ("LYY").

Transactions with related parties are carried out with the following party/parties;

(1) Equity holders of the parent

Transactions between the Group and its subsidiaries, which are related parties of the Group, are not disclosed in this note as they are eliminated on consolidation.

Details of balances and transactions between the Group and other related parties as of 31 December 2021 and 31 December 2020 are disclosed below:

| | 31 December 2021 | 31 December 2020 |
|---|---|---|
| **Due from related parties (Trade receivables short - term)** | | |
| Türkiye Garanti Bankası A.Ş. (1) | 45.378 | 6.727 |
| Akbank T.A.Ş. (1) | 6.292 | 6.240 |
| Türkiye İş Bankası A.Ş. (1) | 2.199 | 2.367 |
| | **53.869** | **15.334** |

| Deposits held by related parties | 31 December 2021 | 31 December 2020 |
|---|---|---|
| **Türkiye İş Bankası A.Ş. (1)** | | |
| Time Deposit | 2.029 | 1.993 |
| Demand Deposit | 172.026 | 200.296 |
| | **174.055** | **202.289** |
| **Akbank T.A.Ş. (1)** | | |
| Time Deposit | 12.978 | 60.150 |
| Demand Deposit | 106.992 | 46.793 |
| | **119.970** | **106.943** |
| **Türkiye Garanti Bankası A.Ş. (1)** | | |
| Time Deposit | 2.816 | – |
| Demand Deposit | 142.498 | 104.582 |
| | **145.314** | **104.582** |

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 8. DUE FROM AND DUE TO RELATED PARTIES (CONTINUED)

| Bank loans from related parties | 31 December 2021 | 31 December 2020 |
|---|---|---|
| Türkiye İş Bankası A.Ş. (1) | – | 604.809 |
| Türkiye Garanti Bankası A.Ş. (1) | – | 264.944 |
| | – | **869.753** |

| Hedge Transactions from Related Parties | | 31 December 2021 | | | 31 December 2020 | | |
|---|---|---|---|---|---|---|---|
| **Bank** | **Instruments Type** | | **Nominal Amount** | **Fair Value Amount (TL)** | | **Nominal Amount** | **Fair Value Amount (TL)** |
| Akbank T.A.Ş. (1) | Foreign Currency Swaps | EUR | 49.000 | 70.022 | – | – | – |
| Akbank T.A.Ş. (1) | Foreign Currency Swaps | USD | 80.000 | 30.967 | – | – | – |
| Akbank T.A.Ş. (1) | Forwards | – | – | – | USD | 58.812 | (64.009) |
| Akbank T.A.Ş. (1) | Forwards | – | – | – | EUR | 45.953 | (22.413) |
| Türkiye Garanti Bankası A.Ş. (1) | Foreign Currency Swaps | USD | 35.000 | 39.894 | – | – | – |
| Türkiye Garanti Bankası A.Ş. (1) | Foreign Currency Swaps | EUR | 22.000 | (5.332) | – | – | – |
| Türkiye Garanti Bankası A.Ş. (1) | Forwards | USD | 8.433 | 35.263 | – | – | – |
| Türkiye İş Bankası A.Ş. (1) | Foreign Currency Swaps | USD | 35.000 | 50.259 | – | – | – |
| | | | | **221.073** | | | **(86.422)** |

The amount of the guarantee given to the related companies for the financing of the device purchases by the distributor companies and sold to the Group customers within the scope of the committed campaigns is disclosed in Note 24.

***Transactions with shareholders:***

TT Mobil is required under the terms of the TT Mobil Concession Agreement, to pay 15% share to the Treasury (the Treasury Share) of its monthly gross revenue. Besides, the Company and its other subsidiaries that are operating in the telecommunications sector are required to pay universal service fund at 1% of their net revenues of each year and ICTA share at 0,35% of revenues to the Ministry of Transport, Maritime Affairs and Communications under the law Global Service Act numbered 5369. Also, according to Law numbered 7061 "Legislation on Amendment of Certain Tax Legislation and Other Certain Legislation, TT Mobil is required to pay 5% share (radio fee) of its monthly net revenue to ICTA.

As of 31 December 2021, unpaid portion of Treasury Share, universal service fund and ICTA share are recorded under other short term payables and these expenses are accounted in cost of sales account.

***Transactions with related parties:***

| Interest income from related parties | 1 January - 31 December 2021 | 1 January - 31 December 2020 |
|---|---|---|
| Akbank T.A.Ş. (1) | 5.037 | 8.138 |
| Türkiye Garanti Bankası A.Ş. (1) | 824 | 60 |
| Türkiye İş Bankası A.Ş. (1) | – | 3.042 |
| | **5.861** | **11.240** |

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 8. DUE FROM AND DUE TO RELATED PARTIES (CONTINUED)

| **Interest expense from related parties** | **1 January - 31 December 2021** | **1 January - 31 December 2020** |
|---|---|---|
| Türkiye Garanti Bankası A.Ş. (1) | 22.258 | 21.877 |
| Türkiye İş Bankası A.Ş. (1) | 19.522 | 61.923 |
| Akbank T.A.Ş. (1) | 18.986 | 2.770 |
| | **60.766** | **86.570** |
| **Other income from related parties** | | |
| Türkiye Garanti Bankası A.Ş. (1) | 151.360 | 59.601 |
| Akbank T.A.Ş. (1) | 109.219 | 83.388 |
| Türkiye İş Bankası A.Ş. (1) | 15.971 | 23.410 |
| | **276.550** | **166.399** |

The Group generates revenues from related parties by providing fixed voice, corporate data, mobile and internet services.

***Compensation of key management personnel***

The remuneration of Board of Directors and other members of key management were as follows:

| | **1 January - 31 December 2021** | **1 January - 31 December 2020** |
|---|---|---|
| Short-term benefits | 109.771 | 97.873 |
| Long-term benefits | 2.624 | 2.179 |
| | **112.395** | **100.052** |

Key management personnel comprise the Group's members of Board of Directors and top managers.

## 9. OTHER RECEIVABLES AND PAYABLES

***Other short term receivable***

| | **31 December 2021** | **31 December 2020** |
|---|---|---|
| Other short term receivable | 107.525 | 65.376 |
| Deposits and guarantees given | 5.396 | 3.020 |
| Other doubtful receivables | 43.136 | 41.366 |
| Allowance for other doubtful receivables | (43.136) | (41.366) |
| | **112.921** | **68.396** |

As of 31 December 2021, TL 37.695 (31 December 2020: TL 31.080) portion of other short term receivables consists of receivables from Ministry of Transport and Communications due to the expenditure for service of Universal Service Fund.

As of 31 December 2021, other doubtful provision amounting to TL 5.147 (31 December 2020: TL 9.820) is provided while TL 3.377 (31 December 2020: TL 3.606) is reversed.

***Other long term receivables***

| | **31 December 2021** | **31 December 2020** |
|---|---|---|
| Deposits and guarantees given | 38.739 | 32.825 |
| | **38.739** | **32.825** |

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 9. OTHER RECEIVABLES AND PAYABLES (CONTINUED)

***Other short term payable***

| | 31 December 2021 | 31 December 2020 |
|---|---|---|
| Taxes and duties payable | 463.270 | 280.850 |
| Universal Service Fund (*) | 253.180 | 214.707 |
| ICTA shares | 233.091 | 199.221 |
| Treasury share accruals | 186.443 | 145.928 |
| Other payables (**) | 259.744 | 153.004 |
| | **1.395.728** | **993.710** |

(*) According to the article numbered 5369 related with "International Service Fund" published on 16 June 2005, Türk Telekom, TTNet and AssisTT will contribute 1% of their net revenues of each year to the Ministry of Transportation as Universal Service Fund. The contribution is payable by the end of April of the following year.

(**) As of 31 December 2021, amounting to TL 219.782 in other short term payables is comprised of guarantees given for borrowings of distributors which are utilized in financing of equipment purchases that will be sold to Group's customers as part of commitment sales.

***Other long term payables***

| | 31 December 2021 | 31 December 2020 |
|---|---|---|
| Deposits and guarantees received | 40.299 | 43.656 |
| | **40.299** | **43.656** |

## 10. INVENTORIES

The Group has inventory amounting to TL 439.933 as of 31 December 2021 (31 December 2020: TL 248.966). Major part of this balance is composed of modems, computer, tablet, dect phones, cable, cable box and SIM cards.

## 11. DEFERRED TAX ASSETS AND LIABILITIES

The Group calculates deferred tax assets and liabilities based on temporary differences arising between the carrying amount of assets and liabilities as reported under Turkish Accounting Standards and their tax base for statutory purposes. These temporary differences are mainly due to the timing differences of certain income and expense items in statutory and Turkish Accounting Standards financial statement as disclosed below.

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 11. DEFERRED TAX ASSETS AND LIABILITIES (CONTINUED)

As of 31 December 2021, 20% and 23% tax rate are used for the calculation of deferred tax assets and liabilities for companies established in Turkey depending on the estimation of on which years temporary differences will reverse (31 December 2020: 20%).

| | Deferred tax assets | | Deferred tax liability | | Deferred tax asset / (liability), net | |
|---|---|---|---|---|---|---|
| | 31 December 2021 | 31 December 2020 | 31 December 2021 | 31 December 2020 | 31 December 2021 | 31 December 2020 |
| Deferred tax asset recognized from tax losses carried forward | 1.064.193 | 606.474 | - | - | 1.064.193 | 606.474 |
| Deferred tax asset arising from capital increase | 329.864 | 27.241 | - | - | 329.864 | 27.241 |
| Deferred tax asset recognized from capital allowance | 690.962 | 22.443 | - | - | 690.962 | 22.443 |
| Provision for long-term employee benefits | 209.527 | 206.606 | - | - | 209.527 | 206.606 |
| Provision for doubtful receivables | 34.332 | 28.122 | (6.148) | (10.642) | 28.184 | 17.480 |
| Derivative instruments | - | - | (720.989) | (112.714) | (720.989) | (112.714) |
| Issued debt instruments | 33.254 | 36.509 | - | - | 33.254 | 36.509 |
| Temporary differences on property, plant and equipment / intangible assets | 754.737 | 691.379 | (989.415) | (1.152.494) | (234.678) | (461.115) |
| R&D investment incentive | 184.701 | - | - | - | 184.701 | - |
| Other | 1.543.023 | 246.702 | (1.068.614) | (16.234) | 474.409 | 230.468 |
| **Deferred tax asset / (liability) before net-off** | **4.844.593** | **1.865.476** | **(2.785.166)** | **(1.292.084)** | **2.059.427** | **573.392** |
| **Net-off of tax** | **(2.482.186)** | **(576.951)** | **2.482.186** | **576.951** | **-** | **-** |
| **Net deferred tax asset / (liability)** | **2.362.407** | **1.288.525** | **(302.980)** | **(715.133)** | **2.059.427** | **573.392** |

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 12. OTHER CURRENT ASSETS, OTHER LIABILITIES AND EMPLOYEE BENEFIT OBLIGATIONS

***Other current assets***

| | 31 December 2021 | 31 December 2020 |
|---|---|---|
| Value Added Tax ("VAT") and Special Communication Tax ("SCT") | 336.480 | 73.777 |
| Intermediary services for collection (*) | 155.026 | 121.747 |
| Advances given (**) | 15.828 | 44.499 |
| Other current assets | 40.794 | 13.544 |
| | **548.128** | **253.567** |

(*) Intermediary services for collections consist of advances given by the Group to its distributors.

(**) Advances given mainly consists of advances given to suppliers.

***Other current liabilities***

| | 31 December 2021 | 31 December 2020 |
|---|---|---|
| Other liabilities | 21.489 | 18.743 |
| | **21.489** | **18.743** |

***Employee benefit obligations***

| | 31 December 2021 | 31 December 2020 |
|---|---|---|
| Social security premiums payables | 85.148 | 64.736 |
| Employee's income tax payables | 78.781 | 62.407 |
| Payables to personnel | 51.185 | 72.625 |
| | **215.114** | **199.768** |

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 13. PREPAID EXPENSES AND DEFERRED REVENUES

***Short-term prepaid expenses***

| | 31 December 2021 | 31 December 2020 |
|---|---|---|
| Other prepaid expenses (*) | 362.328 | 190.797 |
| Prepaid rent expenses | 20.579 | 8.672 |
| | **382.907** | **199.469** |

(*) Other short-term prepaid expenses consist of advances given for fixed asset purchases, prepaid insurance, prepaid maintenance, prepaid advertising and other prepaid expenses.

***Long-term prepaid expenses***

| | 31 December 2021 | 31 December 2020 |
|---|---|---|
| Other prepaid expenses | 18.565 | 11.616 |
| Prepaid rent expenses | 1.433 | 1.756 |
| | **19.998** | **13.372** |

***Short-term contract liabilities***

| | 31 December 2021 | 31 December 2020 |
|---|---|---|
| Contract liabilities from sale of goods and service contracts (*) | 713.389 | 623.339 |
| | **713.389** | **623.339** |

(*) Short-term contract liabilities mainly consist of invoiced but unconsumed minutes, deferred monthly fixed fee revenues due to the allocation of total consideration in the contract to all products and services under TFRS 15 and TTINT's indefeasible right of use contracts.

***Long-term contract liabilities***

| | 31 December 2021 | 31 December 2020 |
|---|---|---|
| Contract liabilities from sale of goods and service contracts (*) | 1.417.662 | 1.008.522 |
| | **1.417.662** | **1.008.522** |

(*) TL 196.118 of the long-term contract liabilities consist of advances received from customer and the remaining mainly consist of TTINT's indefeasible right of use contracts. As of 31 December 2021, Group is expected that 21% of the liabilities arising from long-term contract liabilities will be recognised as revenue in 2023, 21% in 2024 and 58% in the following years.

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 14. FINANCIAL INVESTMENTS

| | 31 December 2021 | 31 December 2020 |
|---|---|---|
| Cetel | – | 11.840 |
| Other | 13.671 | 6.116 |
| | **13.671** | **17.956** |

The Group holds 6,84 % of shares of Cetel as equity investment. As of 31 December 2021, calculated using the average of discounted cash flow method and market approach method, the fair value difference is recognised in other comprehensive income.

## 15. DERIVATIVE FINANCIAL INSTRUMENTS

***Cash flow hedges and derivative financial instruments***

***Cross currency swap transaction***

As of 31 December 2021 fair value of participating cross currency swap transactions amounting to TL 3.165.341 has been recognized under short term derivative financial assets (31 December 2020: TL 40.914 short term derivative financial liabilities, TL 1.206.509 short term derivative financial assets).
Total derivative transactions made by the Group to hedge currency risk amounting to TL 30.322.146 equivalent to 2.274.900 USD. Total long and short financial liabilities in foreign currency amounting to TL 33.234.165 equivalent to 2.493.373 USD.

| Company | Notional Amount (USD) | Trade Date | Amendment Date | Terms | Fair Value Amount as of 31 December 2021 (TL) |
|---|---|---|---|---|---|
| Türk Telekom | 500.000 | 31 March 2016 - 15 December 2017 | 21 October 2020 - 28 January 2021 | Pay TL and receive USD at June 2024 | 1.176.818 |
| Türk Telekom | 109.500 | 14 November 2018 | 11 - 21 June 2021 | Pay TL and receive USD between October 2019 - April 2024 | 312.857 |
| Türk Telekom | 100.000 | 27 - 28 September 2018 | | Pay TL and receive USD at July 2022 | 284.806 |
| Türk Telekom | 73.444 | 6 - 8 January 2020 | 17 - 26 November 2020 | Pay TL and receive USD between April 2020 - October 2022 | 160.441 |
| Türk Telekom | 54.647 | 27 September 2019 - 6 September 2021 | | Pay TL and receive USD between March 2020 - September 2025 | 112.946 |
| Türk Telekom | 54.190 | 25 October 2018 - 18 July 2019 | 11 June 2021 | Pay TL and receive USD between April 2019 - April 2025 | 133.978 |
| Türk Telekom | 50.000 | 17 December 2020 | | Pay TL and receive USD at February 2025 | 141.329 |
| Türk Telekom | 49.686 | 13 November 2018 - 19 July 2019 | 14 June 2021 | Pay TL and receive USD between September 2019 - September 2025 | 124.503 |
| Türk Telekom | 35.542 | 20 November 2019 | 4 June 2021 | Pay TL and receive USD between January 2020 - October 2022 | 101.325 |
| Türk Telekom | 5.703 | 23 July 2019 | | Pay TL and receive USD between October 2019 - October 2022 | 13.848 |
| Türk Telekom | 72.727 (*) | 27 - 28 March 2018 | 12 November - 2 December 2020 | Pay TL and receive EUR between December 2020 - December 2025 | 218.336 |
| Türk Telekom | 57.063 (*) | 16 August 2021 | | Pay TL and receive EUR between September 2021 - March 2026 | 78.268 |
| Türk Telekom | 48.000 (*) | 18 August 2021 | | Pay TL and receive EUR between October 2021 - December 2025 | 77.911 |
| Türk Telekom | 41.000 (*) | 5 August 2021 | | Pay TL and receive EUR at August 2022 | 58.636 |
| Türk Telekom | 38.679 (*) | 13 August 2021 | | Pay TL and receive EUR between October 2021 - December 2025 | 52.498 |
| Türk Telekom | 20.393 (*) | 27 - 28 June 2019 | 10 November 2021 | Pay TL and receive EUR between September 2019 - September 2024 | 51.598 |
| Türk Telekom | 20.000 (*) | 4 June - 1 August 2018 | 12 - 26 September 2018 | Pay TL and receive EUR between November 2018 - November 2022 | 65.243 |
| | | | | | **3.165.341** |

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 15. DERIVATIVE FINANCIAL INSTRUMENTS (CONTINUED)

### *Cash flow hedges and derivative financial instruments (continued)*

### *Cross currency swap transaction (continued)*

| Company | Notional Amount (USD) | Trade Date | Amendment Date | Terms | Fair Value Amount as of 31 December 2020 (TL) |
|---|---|---|---|---|---|
| Türk Telekom | 325.000 | 13 April 2016 - 15 December 2017 | 21 October - 10 November 2020 | Pay TL and receive USD at June 2024 | 252.954 |
| Türk Telekom | 100.000 | 11 - 12 October 2018 | | Pay TL and receive USD at January 2021 | 126.799 |
| Türk Telekom | 50.000 | 11 October 2018 | | Pay TL and receive USD at April 2021 | 53.697 |
| Türk Telekom | 43.976 | 20 November 2019 | | Pay TL and receive USD between January 2020 - October 2022 | 54.191 |
| Türk Telekom | 90.871 | 6 - 8 January 2020 | 17 - 26 November 2020 | Pay TL and receive USD between April 2020 - October 2022 | 70.317 |
| Türk Telekom | 69.670 | 25 October 2018 - 18 July 2019 | | Pay TL and receive USD between April 2019 - April 2025 | 50.330 |
| Türk Telekom | 22.359 | 22 - 23 July 2019 | | Pay TL and receive USD between October 2019 - October 2022 | 28.557 |
| Türk Telekom | 58.367 | 27 - 30 September 2019 | | Pay TL and receive USD between March 2020 - September 2025 | 63.015 |
| Türk Telekom | 64.682 | 13 November 2018 - 19 July 2019 | | Pay TL and receive USD between September 2019 - September 2025 | 48.495 |
| Türk Telekom | 100.000 | 27 - 28 September 2018 | | Pay TL and receive USD at July 2022 | 83.696 |
| Türk Telekom | 124.500 | 14 November 2018 | | Pay TL and receive USD between October 2019 - April 2024 | 83.274 |
| Türk Telekom | 90.909 (*) | 27 - 28 March 2018 | 12 November 2020 - 2 December 2020 | Pay TL and receive EUR between December 2020 - December 2025 | 115.784 |
| Türk Telekom | 28.152 (*) | 27 - 28 June 2019 | | Pay TL and receive EUR between September 2019 - September 2024 | 42.430 |
| Türk Telekom | 58.182 (*) | 4 June - 1 August 2018 | 12 - 26 September 2018 | Pay TL and receive EUR between November 2018 - November 2022 | 132.970 |
| | | | | | **1.206.509** |

*(*) Nominal amount of indicated operations are Euro.*

| Company | Notional Amount (USD) | Trade Date | Amendment Date | Terms | Fair Value Amount as of 31 December 2020 (TL) |
|---|---|---|---|---|---|
| Türk Telekom | 175.000 | 31 March 2016 | 11 December 2018 | Pay TL and receive USD at June 2024 | (16.366) |
| Türk Telekom | 50.000 | 17 December 2020 | | Pay TL and receive USD at February 2025 | (24.548) |
| | | | | | **(40.914)** |

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 15. DERIVATIVE FINANCIAL INSTRUMENTS (CONTINUED)

### *Cash flow hedges and derivative financial instruments (continued)*

### *Copper hedge transactions*

As of 31 December 2021 fair value of participating cross currency swap transactions amounting to TL 1.782 has been recognized under short term derivative financial assets, TL 159 has been recognized under short term derivative financial liabilities (31 December 2020: TL 6.619 short term derivative financial liabilities).

| Company | Notional Amount (Tonnes) | Trade Date | Terms and Maturity Date | Fair Value Amount as of 31 December 2021 (TL) |
|---|---|---|---|---|
| Türk Telekom | 400 | 7 - 10 June 2021 | Pay floating price and receive fixed price between July 2021 - January 2022 | 1.782 |
| | | | | **1.782** |

| Company | Notional Amount (Tonnes) | Trade Date | Terms and Maturity Date | Fair Value Amount as of 31 December 2021 (TL) |
|---|---|---|---|---|
| Türk Telekom | 100 | 9 July 2021 | Pay floating price and receive fixed price between August 2021 - January 2022 | (159) |
| | | | | **(159)** |

| Company | Notional Amount (Tonnes) | Trade Date | Terms and Maturity Date | Fair Value Amount as of 31 December 2020 (TL) |
|---|---|---|---|---|
| Türk Telekom | 453 | 10 - 18 October 2019 | Pay floating price and receive fixed price between November 2019 - February 2021 | (6.619) |
| | | | | **(6.619)** |

### *Forwards*

As of 31 December 2021, fair value of participating forward transactions amounting to TL 103.533 has been recognized under short-term derivative financial assets.

| Company | Notional Amount (USD) | Trade Date | Terms | Fair Value Amount as of 31 December 2021 (TL) |
|---|---|---|---|---|
| Türk Telekom | 21.680 | 12 July - 2 August 2021 | Pay TL and receive USD between January 2022 - January 2023 | 103.533 |
| | | | | **103.533** |

As of 31 December 2021, the Group has 17 electricity forward transactions with a total nominal value of USD 21.680. Electricity forward contracts have been designated as a hedging instrument that may arise from the cash flows of electricity purchases in 2022 and 2023, which are likely to be realized as of January 2022 and January 2023 and are subject to cash flow hedge accounting.

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 15. DERIVATIVE FINANCIAL INSTRUMENTS (CONTINUED)

### *Interest rate derivative instruments which are not designated as hedge*

### *Interest rate swaps*

As of 31 December 2021 fair value of interest rate derivative transactions amounting to TL 351.986 has been recognized under long term derivative financial liabilities, TL 39.980 has been recognized under short term derivative financial assets (31 December 2020: TL 347.286 long term derivative financial liabilities, TL 32.710 short term derivative financial assets).

| Company | Notional Amount (USD) | Trade Date | Terms and Maturity Date | Fair Value Amount as of 31 December 2021 (TL) |
|---|---|---|---|---|
| Türk Telekom | 300.000 | 29 April - 20 May 2014 | Pay fixed rates and receive floating rates between June 2016 - June 2024 | (292.128) |
| Türk Telekom | 150.000 | 15 May - 16 May 2014 | Pay fixed rates and receive rates between June 2016 - August 2016 and June 2024 - August 2024 | (59.858) |
| | | | | **(351.986)** |

| Company | Notional Amount (USD) | Trade Date | Terms and Maturity Date | Fair Value Amount as of 31 December 2020 (TL) |
|---|---|---|---|---|
| Türk Telekom | 300.000 | 29 April - 20 May 2014 | Pay fixed rates and receive floating rates between June 2016 - June 2024 | (274.959) |
| Türk Telekom | 150.000 | 15 May - 16 May 2014 | Pay fixed rates and receive rates between June 2016 - August 2016 and June 2024 - August 2024 | (72.327) |
| | | | | **(347.286)** |

| Company | Notional Amount (USD) | Trade Date | Terms and Maturity Date | Fair Value Amount as of 31 December 2021 (TL) |
|---|---|---|---|---|
| Türk Telekom | 300.000 | 29 April - 20 May 2014 | Pay the difference between floating rate and 6% if floating rate exceeds 6%, between June 2021 - June 2024, and receive fixed premium (0,39%-0,45%) | 39.980 |
| | | | | **39.980** |

| Company | Notional Amount (USD) | Trade Date | Terms and Maturity Date | Fair Value Amount as of 31 December 2020 (TL) |
|---|---|---|---|---|
| Türk Telekom | 300.000 | 29 April - 20 May 2014 | Pay the difference between floating rate and 4% if floating rate exceeds 4%, between June 2016 - June 2021, and receive fixed premium (0,44%-0,575%)<br>Pay the difference between floating rate and 6% if floating rate exceeds 6%, between June 2021 - June 2024, and receive fixed premium (0,39%-0,45%) | 32.710 |
| | | | | **32.710** |

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 15. DERIVATIVE FINANCIAL INSTRUMENTS (CONTINUED)

### *Cross Currency swaps instruments which are not designated as hedge*

As of 31 December 2021, fair value of derivative transactions amounting to TL 728.427 is recognized under short term derivative financial assets and TL 114.611 is recognized under short term financial liabilities (31 December 2020: TL 320.186 short term financial liabilities, TL 958 short term financial assets).

### *USD/EUR Cross Currency Swaps Instruments*

| Company | Notional Amount (USD) | Trade Date | Terms | Fair Value Amount as of 31 December 2021 (TL) |
|---|---|---|---|---|
| TTINT Türkiye | 30.000 | 16 June 2016 | Pay EUR and receive USD between December 2016 and June 2026 | (3.047) |
| | | | | **(3.047)** |

| Company | Notional Amount (USD) | Trade Date | Terms | Fair Value Amount as of 31 December 2020 (TL) |
|---|---|---|---|---|
| TTINT Türkiye | 36.667 | 16 June 2016 | Pay EUR and receive USD between December 2016 and June 2026 | (29.812) |
| | | | | **(29.812)** |

### *Futures*

| Company | Notional Amount (USD) | Trade Date | Terms | Fair Value Amount as of 31 December 2021 (TL) |
|---|---|---|---|---|
| Türk Telekom | 206.202 | 15 November - 10 December 2021 | Net TL settlement in January 2022 based on the difference between contract price and contract closing price | 162.462 |
| TT Mobil | 72.692 | 16 November - 28 December 2021 | Net TL settlement in January 2022 based on the difference between contract price and contract closing price | 61.663 |
| | | | | **224.125** |

| Company | Notional Amount (USD) | Trade Date | Terms | Fair Value Amount as of 31 December 2021 (TL) |
|---|---|---|---|---|
| TT Mobil | 130.000 | 13 - 22 December 2021 | Net TL settlement in February 2022 based on the difference between contract price and contract closing price | (91.259) |
| | | | | **(91.259)** |

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 15. DERIVATIVE FINANCIAL INSTRUMENTS (CONTINUED)

### *Cross Currency swaps instruments which are not designated as hedge (continued)*

### *Futures (continued)*

| Company | Notional Amount (USD) | Trade Date | Terms | Fair Value Amount as of 31 December 2020 (TL) |
|---|---|---|---|---|
| Türk Telekom | 150.000 | 19 October - 24 December 2020 | Net TL settlement between January and February 2021 based on the difference between contract price and contract closing price | (62.824) |
| TT Mobil | 50.000 | 27 November - 28 December 2020 | Net TL settlement between January and February 2021 based on the difference between contract price and contract closing price | (8.584) |
| | | | | **(71.408)** |

### *Forwards*

| Company | Notional Amount (USD) | Trade Date | Terms | Fair Value Amount as of 31 December 2021 (TL) |
|---|---|---|---|---|
| Türk Telekom | 7.634 | 7 October 2021 | Pay TL and receive USD at April 2021 | 31.806 |
| | | | | **31.806** |

| Company | Notional Amount (USD) | Trade Date | Terms | Fair Value Amount as of 31 December 2020 (TL) |
|---|---|---|---|---|
| Türk Telekom | 23.500 (*) | 30 - 31 December 2020 | Net TL settlement in February 2021 based on the difference between contract price and contract closing price | 958 |
| | | | | **958** |

| Company | Notional Amount (USD) | Trade Date | Terms | Fair Value Amount as of 31 December 2020 (TL) |
|---|---|---|---|---|
| Türk Telekom | 121.240 | 3 - 22 December 2020 | Net TL settlement in January 2021 based on the difference between contract price and contract closing price | (52.896) |
| Türk Telekom | 97.678 | 27 October - 2 December 2020 | Pay TL and receive USD between January and December 2021 | (74.300) |
| Türk Telekom | 53.860 (*) | 2 November - 2 December 2020 | Pay TL and receive EUR between January and December 2021 | (32.931) |
| Türk Telekom | 168.660 (*) | 3 - 29 December 2020 | Net TL settlement in January 2021 based on the difference between contract price and contract closing price | (58.839) |
| | | | | **(218.966)** |

*(*) Nominal amount of indicated operations are Euro.*

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 15. DERIVATIVE FINANCIAL INSTRUMENTS (CONTINUED)

***Cross Currency swaps instruments which are not designated as hedge (continued)***

***USD/EUR Foreign Currency Swap Instruments***

| Company | Notional Amount (USD) | Trade Date | Terms | Fair Value Amount as of 31 December 2021 (TL) |
|---|---|---|---|---|
| Türk Telekom | 245.000 | 15 November - 29 December 2021 | Pay TL and receive USD at January 2022 | 373.171 |
| Türk Telekom | 69.000 (*) | 29 November - 29 December 2021 | Pay TL and receive EUR at January 2022 | 99.324 |
| | | | | **472.495** |

| Company | Notional Amount (USD) | Trade Date | Terms | Fair Value Amount as of 31 December 2021 (TL) |
|---|---|---|---|---|
| Türk Telekom | 20.000 | 3 December 2021 | Pay TL and receive USD at February 2022 | (14.973) |
| Türk Telekom | 22.000 (*) | 31 December 2021 | Pay TL and receive EUR at January 2022 | (5.332) |
| | | | | **(20.305)** |

*(*) Nominal amount of indicated operations are Euro.*

### Hedge of net investment in a foreign operation

The Company utilized a loan amounting to EUR 150.000 in order to hedge its net investment in a foreign operation with a Euro functional currency. Foreign exchange gain and/or loss resulting from the subsidiary's net investment portion of this loan is reclassified to reserve for hedge of net investment in a foreign operation under equity.

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 16. GOODWILL

| | 31 December 2021 | 31 December 2020 |
|---|---|---|
| Goodwill of TT Mobil | 29.694 | 29.694 |
| Goodwill of Argela | 7.942 | 7.942 |
| Goodwill of Innova | 7.308 | 7.308 |
| | **44.944** | **44.944** |

The Group performs impairment analysis for goodwill and other non-current asset groups annually as of 31 December. The Group has performed impairment analysis for all of the identified cash generating units.

### TT Mobil cash generating unit impairment test

TT Mobil has been considered as a single cash generating unit and has been tested for impairment together for goodwill and all other assets. Recoverable amount is calculated through based on 5 years business plan which is approved by the management.

The discount ratio used for the cash flows is 16,9% (31 December 2020: 17,0%). Cash flow projections after 2026 are estimated by using 10,0% growth rate, considering the inflation rate used in the business plan and expected growth rate of TT Mobil. Company value of TT Mobil has been tested at a sensitivity of WACC terminal growth rate by +1%/-1% (31 December 2020: +1%/-1%). As a result of the impairment test, it has been noted that there is no impairment is identified on goodwill arising on the TT Mobil acquisition.

### Innova and Argela cash generating unit impairment test

Innova and Argela, are both considered as single cash generating unit and are tested for impairment of for goodwill and all of their other assets. Recoverable amount was determined through the usage value which is calculated based on the 6 years business plan approved by the management. The estimated value of the projected cash flows consists of the discounted cash flows until 2026. Cash flow projections beyond 2026 are estimated by using 10,0% growth rate, for both Innova and Argela, respectively, considering the inflation rate used in the business plan and expected growth rate of the country. The discount ratio used for the cash flows is 20,4% for Innova (31 December 2020: 20,3%) and 22,0% for Argela (31 December 2020: 21,9%). Valuation has been tested at a sensitivity of +1%/-1%. For the WACC calculation, technology companies have been taken as a benchmark for the calculation of the beta coefficient. As a result of the impairment test, no impairment is identified for the cash generating units and the goodwill arising from the acquisition of Argela and Innova.

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 17. ASSETS HELD FOR SALE

Asset held for sales are measured at the lower of carrying value and the fair value less costs of sale.

As of 31 December 2021, net book value of asset held for sale is TL 56.418 (31 December 2020: 37.361 TL). Assets, the fair value of TL 19.057, has been transferred to the assets held for sale from the property, plant and equipment according to sales planning of the Group management.

## 18. INVESTMENT PROPERTY

The movement of investment property and the related accumulated depreciation for the years ended 31 December 2021 and 31 December 2020 is given below:

| | **1 January - 31 December 2021** | **1 January - 31 December 2020** |
|---|---|---|
| **Cost** | | |
| Opening balance | 40.047 | 40.047 |
| Transfer | 1.498 | − |
| **As of 31 December** | **41.545** | **40.047** |
| **Accumulated depreciation** | | |
| Opening | 22.435 | 22.348 |
| Transfer | 1.436 | (1.406) |
| Depreciation charge for the year | 2.191 | 1.242 |
| Impairment (-) | − | 251 |
| **As of 31 December** | **26.062** | **22.435** |
| **Net book value as of 31 December** | **15.483** | **17.612** |

Investment property consists of number of buildings and lands mainly occupied by various corporations.

The Group assesses whether there is any impairment indicator in investment properties. If such indicator exists the Group compares fair values and carrying values of the investment properties on an individual asset basis and records identified impairment of the investment properties.

The Group's investment properties consist of number of buildings and lands. In accordance with balance between cost and benefit principle the fair values of all investment properties are not determined in each year, instead selected investment properties' fair values have been determined. In this context, fair values of the investment properties as of the balance sheet date are not presented (Note 19).

Independent valuation companies licensed by CMB measure the fair value of investment properties of the Group. As of 31 December 2021, the fair value of investment property is TL 160.303.

*(Currency in Thousands of Turkish Lira (TL) unless otherwise stated, all other currencies are also disclosed in thousands)*

## 19. PROPERTY, PLANT AND EQUIPMENT

The movement of PPE and the related accumulated depreciation for the years ended 31 December 2021 and 31 December 2020 is given below:

| | Land | Buildings | Network and other equipment | Vehicles | Furniture and fixtures | Other fixed assets | Construction in progress | Total |
|---|---|---|---|---|---|---|---|---|
| **Cost** | | | | | | | | |
| Opening balance, 1 January 2021 | 5.894.276 | 2.180.193 | 41.659.258 | 137.389 | 946.250 | 268.829 | 137.572 | 51.223.767 |
| Transfer | (13.947) | 38.270 | 670.362 | 1.267 | 65.364 | 1.182 | (773.005) | (10.507) |
| Additions | 74 | 78.447 | 2.656.051 | 10.494 | 150.590 | 2.996 | 1.328.097 | 4.226.749 |
| Revaluation | 518.828 | – | – | – | – | – | – | 518.828 |
| Disposal | (9.946) | (400) | (645.482) | (5.181) | (31.149) | (1.730) | (875) | (694.763) |
| Foreign currency translation differences | 8.087 | 23.906 | 1.752.809 | 1.115 | 19.237 | 8.466 | 29.516 | 1.843.136 |
| **Closing balance, 31 December 2021** | **6.397.372** | **2.320.416** | **46.092.998** | **145.084** | **1.150.292** | **279.743** | **721.305** | **57.107.210** |
| **Accumulated depreciation** | | | | | | | | |
| Opening balance, 1 January 2021 | – | 1.605.881 | 32.457.836 | 104.026 | 749.260 | 241.853 | – | 35.158.856 |
| Transfer | – | (2.322) | 2.073 | 1.032 | 659 | – | – | 1.442 |
| Depreciation charge for the year | – | 108.181 | 2.131.318 | 9.659 | 73.792 | 12.541 | – | 2.335.491 |
| Disposal | – | (149) | (587.049) | (3.029) | (30.018) | (1.084) | – | (621.329) |
| Impairment | (896) | 2.161 | 1.904 | – | 316 | – | – | 3.485 |
| Foreign currency translation differences | – | 13.789 | 1.223.955 | 720 | 11.750 | 5.305 | – | 1.255.519 |
| **Closing balance, 31 December 2021** | **(896)** | **1.727.541** | **35.230.037** | **112.408** | **805.759** | **258.615** | – | **38.133.464** |
| **Net book value, 31 December 2021** | **6.398.268** | **592.875** | **10.862.961** | **32.676** | **344.533** | **21.128** | **721.305** | **18.973.746** |

As of 31 December 2021, net book value of leased assets of Group composes of vehicles and land buildings amounting respectively TL 294, TL 7.631 (31 December 2020: land and buildings amounting to TL 9.303).

The Group does not have any capitalized borrowing cost on property, plant and equipment (31 December 2020: nil).

There is no restriction or pledge on the tangible as of 31 December 2021.

## 19. PROPERTY, PLANT AND EQUIPMENT (CONTINUED)

For the year ended 31 December 2021, impairment on property, plant and equipment amounting to TL 2.127 is recognized in cost of sales (31 December 2020: TL 48.803), TL 1.358 is recognized in general administrative expenses (31 December 2020: TL 1.846) and there is no recognized in marketing, sales and distribution expenses (31 December 2020: TL 1.930).

As of 31 December 2021, net increase in carrying amount of lands amounting TL 518.828 which is valued by real estate valuation companies licensed by CMB is recognized in other comprehensive income. Valuation companies that performed the valuations are Akademi Gayrimenkul Değerleme ve Danışmanlık A.Ş., Atak Gayrimenkul Değerleme A.Ş., Bilgi Gayrimenkul Değerleme A.Ş., DE-GA Gayrimenkul Değerleme ve Danışmanlık A.Ş., Değer Gayrimenkul Değerleme ve Danışmanlık A.Ş., Düzey Gayrimenkul Değerleme ve Danışmanlık A.Ş., Ekip Taşınmaz Değerleme A.Ş., Eksen Gayrimenkul Değerleme ve Danışmanlık A.Ş., Emsal Gayrimenkul Değerleme ve Danışmanlık A.Ş., Kuzey Kurumsal Gayrimenkul Değerleme ve Danışmanlık A.Ş., LAL Gayrimenkul Değerleme ve Müşavirlik A.Ş., Metrik Gayrimenkul Değerleme Danışmanlık A.Ş., Net Kurumsal Gayrimenkul Değerleme ve Danışmanlık A.Ş., Prime Gayrimenkul Değerleme ve Danışmanlık A.Ş., Vakıf Gayrimenkul Değerleme A.Ş.

*(Currency in Thousands of Turkish Lira (TL) unless otherwise stated, all other currencies are also disclosed in thousands)*

## 19. PROPERTY, PLANT AND EQUIPMENT (CONTINUED)

| | Land | Buildings | Network and other equipment | Vehicles | Furniture and fixtures | Other fixed assets | Construction in progress | Total |
|---|---|---|---|---|---|---|---|---|
| **Cost** | | | | | | | | |
| Opening balance, 1 January 2020 | 5.428.051 | 2.091.418 | 41.687.897 | 108.577 | 871.173 | 256.967 | 487.968 | 50.932.051 |
| Transfer | 1.800 | 4.869 | 765.379 | 84 | 4.534 | (7.986) | (806.206) | (37.526) |
| Additions | 994 | 77.717 | 2.170.258 | 29.181 | 82.631 | 17.972 | 443.833 | 2.822.586 |
| Revaluation | 460.035 | – | – | – | – | – | – | 460.035 |
| Disposal | (162) | (2.916) | (3.590.641) | (1.087) | (18.541) | (89) | (1.471) | (3.614.907) |
| Foreign currency translation differences | 3.558 | 9.105 | 626.365 | 634 | 6.453 | 1.965 | 13.448 | 661.528 |
| **Closing balance, 31 December 2020** | **5.894.276** | **2.180.193** | **41.659.258** | **137.389** | **946.250** | **268.829** | **137.572** | **51.223.767** |
| **Accumulated depreciation** | | | | | | | | |
| Opening balance, 1 January 2020 | – | 1.521.946 | 33.654.355 | 99.622 | 713.570 | 232.899 | – | 36.222.392 |
| Transfer | – | (17.005) | (3.858) | – | 1.401 | (670) | – | (20.132) |
| Depreciation charge for the year | – | 95.959 | 1.931.593 | 5.542 | 49.845 | 8.133 | – | 2.091.072 |
| Disposal | – | (1.566) | (3.570.768) | (1.087) | (18.541) | (89) | – | (3.592.051) |
| Impairment | – | 1.930 | 50.649 | – | – | – | – | 52.579 |
| Foreign currency translation differences | – | 4.617 | 395.865 | (51) | 2.985 | 1.580 | – | 404.996 |
| **Closing balance, 31 December 2020** | – | **1.605.881** | **32.457.836** | **104.026** | **749.260** | **241.853** | – | **35.158.856** |
| **Net book value, 31 December 2020** | **5.894.276** | **574.312** | **9.201.422** | **33.363** | **196.990** | **26.976** | **137.572** | **16.064.911** |

*(Currency in Thousands of Turkish Lira (TL) unless otherwise stated, all other currencies are also disclosed in thousands)*

## 20. INTANGIBLE ASSETS

| | Licence | Customer relationship | Research and Development | Other intangible assets | Subscriber acquisition/ retention cost | Concession rights | Concession assets | Total |
|---|---|---|---|---|---|---|---|---|
| **Cost** | | | | | | | | |
| Opening balance, 1 January 2021 | 4.573.318 | 1.289.966 | 529.767 | 9.943.976 | 3.887.523 | 6.563.899 | 887.366 | 27.675.815 |
| Transfers | (1.270) | – | 25.199 | (37.952) | – | – | – | (14.023) |
| Disposals | – | – | – | (151.952) | – | (84.137) | – | (236.089) |
| Additions (*) | – | – | 76.670 | 1.450.029 | 773.704 | 2.143.278 | 427.968 | 4.871.649 |
| Foreign currency translation differences | 19.496 | 274.709 | 5.034 | 942.816 | – | – | – | 1.242.055 |
| **Closing balance, 31 December 2021** | **4.591.544** | **1.564.675** | **636.670** | **12.146.917** | **4.661.227** | **8.623.040** | **1.315.334** | **33.539.407** |
| **Accumulated amortization** | | | | | | | | |
| Opening balance, 1 January 2021 | 2.169.264 | 1.166.055 | 364.168 | 7.117.858 | 2.422.130 | 2.343.829 | – | 15.583.304 |
| Transfers | (26) | – | – | (6.827) | – | – | – | (6.853) |
| Disposals | – | – | – | (53.795) | – | (83.428) | – | (137.223) |
| Amortization charge for the year | 310.135 | 30.646 | 44.226 | 1.071.357 | 678.900 | 936.338 | – | 3.071.602 |
| Impairment | – | – | – | 29.397 | – | – | – | 29.397 |
| Foreign currency translation differences | 7.291 | 204.677 | 5.034 | 495.110 | – | – | – | 712.112 |
| **Closing balance, 31 December 2021** | **2.486.664** | **1.401.378** | **413.428** | **8.653.100** | **3.101.030** | **3.196.739** | **–** | **19.252.339** |
| **Net book value, 31 December 2021** | **2.104.880** | **163.297** | **223.242** | **3.493.817** | **1.560.197** | **5.426.301** | **1.315.334** | **14.287.068** |

(*) Additions amounting to TL 2.571.246 (31 December 2020: TL 1.846.539) comprise intangible assets under scope of TFRS Interpretation 12.

The Group have no capitalized borrowing cost on intangible assets (31 December 2020: TL 342).

For the year ended 31 December 2021, impairment on intangible assets amounting to TL 28.491 is recognized in cost of sales (31 December 2020: 3.462), TL 906 in general administrative expenses (31 December 2020: Nil) and there is no recognized in marketing, selling and distribution expenses (31 December 2020: TL Nil).

*(Currency in Thousands of Turkish Lira (TL) unless otherwise stated, all other currencies are also disclosed in thousands)*

## 20. INTANGIBLE ASSETS (CONTINUED)

| | Licence | Customer relationship | Research and Development | Other intangible assets | Subscriber acquisition/ retention cost | Concession rights | Concession assets | Total |
|---|---|---|---|---|---|---|---|---|
| **Cost** | | | | | | | | |
| Opening balance, 1 January 2020 | 4.554.808 | 1.183.437 | 449.711 | 8.266.741 | 3.021.232 | 5.108.755 | 496.928 | 23.081.612 |
| Transfers | 12.932 | – | 26.147 | (19.297) | – | – | – | 19.782 |
| Disposals | – | – | – | (10.559) | – | (957) | – | (11.516) |
| Additions (*) | – | – | 53.099 | 1.362.702 | 866.291 | 1.456.101 | 390.438 | 4.128.631 |
| Foreign currency translation differences | 5.578 | 106.529 | 810 | 344.389 | – | – | – | 457.306 |
| **Closing balance, 31 December 2020** | **4.573.318** | **1.289.966** | **529.767** | **9.943.976** | **3.887.523** | **6.563.899** | **887.366** | **27.675.815** |
| **Accumulated amortization** | | | | | | | | |
| Opening balance, 1 January 2020 | 1.858.733 | 1.072.452 | 316.863 | 6.010.718 | 1.794.647 | 1.745.346 | – | 12.798.759 |
| Transfers | – | – | – | 2.388 | – | – | – | 2.388 |
| Disposals | – | – | – | (3.800) | – | (665) | – | (4.465) |
| Amortization charge for the year | 308.579 | 23.517 | 45.365 | 939.630 | 627.483 | 595.686 | – | 2.540.260 |
| Impairment | – | – | – | – | – | 3.462 | – | 3.462 |
| Foreign currency translation differences | 1.952 | 70.086 | 1.940 | 168.922 | – | – | – | 242.900 |
| **Closing balance, 31 December 2020** | **2.169.264** | **1.166.055** | **364.168** | **7.117.858** | **2.422.130** | **2.343.829** | – | **15.583.304** |
| **Net book value, 31 December 2020** | **2.404.054** | **123.911** | **165.599** | **2.826.118** | **1.465.393** | **4.220.070** | **887.366** | **12.092.511** |

*(Currency in Thousands of Turkish Lira (TL) unless otherwise stated, all other currencies are also disclosed in thousands)*

## 20. INTANGIBLE ASSETS (CONTINUED)

For the year ended 31 December 2021, depreciation and amortization expense is recognized cost of sales, sales and distribution expenses, general administration expenses and research and development expenses respectively amounting to TL 4.740.558 (31 December 2020: TL 3.980.600), TL 765.328 (31 December 2020: TL 715.927) and TL 638.479 (31 December 2020: TL 585.757), TL 24.960 (31 December 2020: 36.708), respectively.

Remaining amortization periods after acquisition of significant intangible assets are as follows:

| | |
|---|---|
| TT Mobil license | 7,4 years |
| TTINT customer relationships | 3,8 years |
| TTINT other | 8,8 years |

There is no restriction or pledge on the intangible as of 31 December 2021 (31 December 2020: Nil)

***3G license tender***

The tender for authorization of IMT-2000 / UMTS services has been held on 28 November 2008 with the participation of all three GSM operators operating in Turkey.

The license fee (including 18% VAT) amounting to TL 539.332 is paid by TT Mobil in April 2009 and ultimately the Concession Agreement is signed on 30 April 2009.

The net book value of the 3G license as of 31 December 2021 is TL 177.900 (31 December 2020: TL 201.623).

***GSM 900 additional frequency band tender***

The tender for the reallocation of unused 900 MHz Frequency Bands had been held on 20 June 2008 and TT Mobil had obtained C band with the minimum fee of TL 128 year /channel (excluding VAT).

TT Mobil had been granted 5,5 additional GSM 900 MHz frequency channels as a result of the tender and ultimately total number of GSM 900 MHz frequency channels has reached to 12 together with previously-held 6,5 channels.

TT Mobil made TL 14.122 (including VAT) payment as the tender fee for the remaining GSM license duration and amended license agreement has been signed between TT Mobil and ICTA on 25 February 2009.

The net book value of the GSM 900 license as of 31 December 2021 is TL 2.889 (31 December 2020: TL 3.596).

***4.5G license tender***

Tender of IMT Services and Infrastructures Authorization, also known as 4.5G tender in public has been held in Ankara on August 26, 2015 by ICTA. In the IMT Service and Infrastructure Authorization Tender done by ICTA, TT Mobil has won the following packages: 2x10 MHz bandwidth in 800 MHz frequency for EUR 380.000, 2x7,6 MHz bandwidth in 900 MHz frequency for EUR 216.819, 2x20 MHz bandwidth in 1800 MHz frequency for EUR 310.000, 2x10 MHz bandwidth in 2600 MHz frequency for EUR 25.859, 1x15 MHz bandwidth in 2600 MHz frequency for EUR 22.000. Total spectrum fee is EUR 954.678. IMT Authorization period is valid until 30 April 2029 and will be able to start rendering services starting from 1 April 2016. 900 MHz and services in 1.800 MHz frequency are commenced to be rendered since 1 December 2015.The Company will pay the tender fee (including interest) in four equal instalments amounting to EUR 973.396 (excluded VAT).

As of 31 December 2021 net book value of 4.5G license amounts to TL 1.694.520 (31 December 2020: TL 1.925.591) in the consolidated financial statements.

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 21. PROVISIONS

### *Current provisions*

The movement of current provisions is as follows:

| | 31 December 2021 | 31 December 2020 |
|---|---|---|
| Litigation, ICTA penalty and customer return provisions (*) | 154.411 | 120.702 |
| Provision for expected credit losses on loan commitments (**) | 56.084 | 46.242 |
| | **210.495** | **166.944** |

(*) Consists of TT Mobile tax inspection, The Ministry of Trade fine, ICTA penalties and extraditions to be made as per ICTA resolutions and other commitments provisions. Necessary explanations are stated in Note 24.

(**) Consists of expected credit losses are recognized for the guarantees given for borrowings of distributors which are utilized in financing of equipment purchases that will be sold to Group's customers as part of commitment sales.

The movement of Litigation, ICTA penalty and customer return provisions is as follows:

| | 1 January - 31 December 2021 | 1 January - 31 December 2020 |
|---|---|---|
| **As of 1 January** | **120.702** | **190.381** |
| Provisions for the period | 197.797 | 58.642 |
| Settled provisions | (158.434) | (128.077) |
| Reversals | (5.783) | (719) |
| Foreign currency translation difference | 129 | 475 |
| **As of 31 December** | **154.411** | **120.702** |

### *Current provisions for employee benefits*

| | 31 December 2021 | 31 December 2020 |
|---|---|---|
| Personnel bonus provision | 319.140 | 276.460 |
| | **319.140** | **276.460** |

The movement of provisions is as follows:

| | 1 January - 31 December 2021 | 1 January - 31 December 2020 |
|---|---|---|
| **As of 1 January** | **276.460** | **223.552** |
| Provision for the period | 403.892 | 296.271 |
| Provisions paid | (335.487) | (236.940) |
| Reversals | (36.311) | (9.251) |
| Foreign currency translation difference | 10.586 | 2.828 |
| **As of 31 December** | **319.140** | **276.460** |

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 21. PROVISIONS (CONTINUED)

***Non-current provisions for employee benefits***

| | 31 December 2021 | 31 December 2020 |
|---|---|---|
| **Long term provisions for employee benefits** | | |
| Defined benefit obligation | 1.069.183 | 1.062.589 |
| Unused vacation provisions | 211.831 | 152.200 |
| | **1.281.014** | **1.214.789** |

***Defined benefit obligation***

In accordance with existing social legislation in Turkey, companies are required to make lump-sum payments to employees whose employment is ended due to retirement or for reasons other than resignation or misconduct. The liability is not funded and accordingly there are no plan assets for the defined benefits as there is no funding requirement.

The retirement pay liability as at 31 December 2021 is subject to a ceiling of full TL 8.284,51 (31 December 2020: full TL 7.117,17) per monthly salary for each service year.

In addition to retirement benefits, the Group is liable for certain other non-current employment benefits such as business, service, representation indemnity and jubilee.

i) The movement of defined benefit obligation is as follows:

| | 1 January - 31 December 2021 | 1 January - 31 December 2020 |
|---|---|---|
| **Defined benefit obligation on January 1** | **1.062.589** | **913.107** |
| Service cost | 84.849 | 74.333 |
| Interest cost | 88.915 | 88.429 |
| Actuarial loss (*) | 160.582 | 111.790 |
| Benefits paid | (334.085) | (132.141) |
| Transfer (**) | – | 5.019 |
| Foreign currency translation difference | 6.333 | 2.052 |
| **As of 31 December** | **1.069.183** | **1.062.589** |

(*) As at 31 December 2021, actuarial loss amounting to TL 160.582 (31 December 2020: TL 111.790) is recognized in other comprehensive income.

(**) Consist of severance pay liability of TT Destek Hizmetleri A.Ş. which is established on 16 January 2020.

ii) Total expense recognized in the consolidated income statement:

| | 1 January - 31 December 2021 | 1 January - 31 December 2020 |
|---|---|---|
| Interest cost | 88.915 | 88.429 |
| Service cost | 84.849 | 74.333 |
| **Total net cost recognized in the consolidated statement of income** | **173.764** | **162.762** |

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 21. PROVISIONS (CONTINUED)

***Non-current provisions for employee benefits (continued)***

***Defined benefit obligation (continued)***

iii) Principal actuarial assumptions used:

| | 31 December 2021 | 31 December 2020 |
|---|---|---|
| Interest rate | 19,0% | 12,75% |
| Expected rate of ceiling increases | 14,50% | 8,50% |

For the years ahead, voluntary employee withdrawal of the Group is 2,17% (31 December 2020: 1,99%).

As of 31 December 2021, sensitivity analysis is performed for the significant assumptions of defined benefit obligation:

| | Discount Rate | | Salary Increase Rate | | Employee Withdrawal Rate | |
|---|---|---|---|---|---|---|
| **Sensitivity Level** | **0,25% decrease (18,75%)** | **0,25% increase (19,25%)** | **0,25% decrease (14,25%)** | **0,25% increase (14,75%)** | **0,25% decrease** | **0,25% increase** |
| No effect to defined benefit obligation | 25.672 | (23.943) | (24.856) | 26.501 | (3.852) | 3.754 |

***Unused vacation provisions***

The movement of unused vacation provisions is as follows:

| | 1 January - 31 December 2021 | 1 January - 31 December 2020 |
|---|---|---|
| **As of 1 January** | **152.200** | **131.538** |
| Provision for the period, net | 85.613 | 30.547 |
| Provisions paid | (31.232) | (11.122) |
| Foreign currency translation difference | 5.250 | 1.237 |
| **As of 31 December** | **211.831** | **152.200** |

***Other non-current provisions***

| | 31 December 2021 | 31 December 2020 |
|---|---|---|
| Provision for the investments under the scope of TFRS Interpretation 12 | 10.627 | 8.506 |
| | **10.627** | **8.506** |

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 22. PAID IN CAPITAL, RESERVES AND RETAINED EARNINGS

As of 31 December 2021 and 2020, the shareholders of the Company with their shareholding percentage are as follows:

| | **31 December 2021** | | **31 December 2020** | |
|---|---|---|---|---|
| | **%** | **TL** | **%** | **TL** |
| The Treasury | 25 | 875.000 | 25 | 875.000 |
| LYY Telekomünikasyon A.Ş. | 55 | 1.925.000 | 55 | 1.925.000 |
| Public Share | 15 | 525.000 | 15 | 525.000 |
| Turkish Wealth Fund ("TWF") (*) | 5 | 175.000 | 5 | 175.000 |
| | | **3.500.000** | | **3.500.000** |
| Inflation adjustment to share capital | | (239.752) | | (239.752) |
| | | **3.260.248** | | **3.260.248** |

(*) Council of Ministers decided to transfer 6,68% (5% Group B, 1,68% Group D) of the shares of the Company belonging to the Undersecretariat of Treasury to the Turkish Wealth Fund with regards to Law on Establishment of Turkish Wealth Fund Management Incorporated and on Amending Certain Laws numbered 6741 and dated 19 August 2016.

The Company's share capital is fully paid. Capital of the Company is TL 3.500.000.000, divided into 192.500.000.000 Group "A", 104.999.999.999 Group "B", 1 Group "C", and 52.500.000.000 Group "D" registered shares each with a nominal value of 1 (One) Kuruş. Group D shares are are publicly traded. LYY is the holder of all Group A shares; SWF is the holder of Group B shares representing 5 percent of the share capital of the Company and Group D Shares representing 1.68 percent of the share capital of the Company; the Treasury is the holder of Group B shares representing 25 percent of the share capital of the Company and C Group share (Golden Share).

The Treasury is the holder of the Preferred Stock (Golden Share) as per the law. This share is non-transferable. It provides certain rights to Treasury in order to protect national interests regarding economy and security: (a) Any proposed amendments to the Company's articles of association, (b) the transfer of any registered shares in the Company which would result in a change in the management control of the Company and (c) the registration of any transfer of registered shares in the Company's shareholders' ledger cannot be realized without affirmative vote of the Golden Share at either a meeting of the Board of Directors or the general assembly. Otherwise, such transactions shall be deemed invalid. The holder of the Golden Share, the Treasury, has one member, representing the Golden Share, among the Board of Directors.

## 22. PAID IN CAPITAL, RESERVES AND RETAINED EARNINGS (CONTINUED)

Number of members and independent Board members of the Board of Directors to be nominated by the Group A and Group B Shareholders have been revised by the amendment to the article 8 of the Articles of Association at on the Extraordinary General Meeting dated 25.01.2019 Accordingly;

The Board of directors shall be composed of nine (9) members nominated by the Group A Shareholder, Treasury and Turkish Wealth Fund.

(a) the Group A Shareholder shall be entitled to nominate five (5) persons for election as Directors;

(b) provided that the Treasury and Turkish Wealth Fund, as Group B Shareholders shall hold;

– 30% or more of the Shares, the Treasury shall be entitled to nominate three (3) persons for election as Independent Board Members who carry the independence criteria as defined in the Capital Markets legislation; or

– 15% or more of the Shares (but less than 30% of the Shares) the Treasury shall be entitled to nominate two (2) persons for election as Independent Board Members who the carry the independence criteria as defined in the Capital Markets legislation;

– During the calculation of 15 % and 30 % of the Shares mentioned in above paragraphs, the amount of Group B Shares and Group D Shares held by the Treasury and Turkish Wealth Fund shall be considered together.

(c) as long as the Treasury and Turkish Wealth Fund holds 15% or more of the Shares (but less than 30% of the Shares), the Group A shareholder shall be entitled to nominate one (1) person, who carry the independence criteria as defined in the Capital Markets legislation, for election as Independent Board Members and five (5) persons for election as Director.

(d) while the Treasury holds the C Group Privileged Share, the Treasury shall be entitled to nominate, a further one (1) person, for election as Director for the C Group Privileged Share.

The chairman of the Board of Directors shall be nominated by the directors nominated by the group A shares from among the directors and be elected and removed by the simple majority votes of those present at the meeting of the Board of Directors.

The Vice Chairman shall be nominated by the directors nominated by the Group B Shares from among the Directors and be elected and removed by the simple majority votes of those present at the meeting of the Board of Directors.

Board resolutions shall be passed by a simple majority of the votes of the directors present at such meeting unless the resolution requires a higher majority vote.

The Board of Directors shall propose the distribution of the maximum of the Company's profits lawfully available for distribution in each financial year subject to the Board of Directors making reasonable provisions and transfers to reserves.

## 22. PAID IN CAPITAL, RESERVES AND RETAINED EARNINGS (CONTINUED)

Based on the articles of association of the Company, the Board of Directors shall by way of a simple majority of those present at the relevant meeting of the Board propose the distribution of the maximum of the Company's profits lawfully available for distribution in each financial year subject to the Board making reasonable provisions and transfers to reserves and complying with the conditions set out below.

Provided that it is not against the legislation regarding capital markets, the net profit may not be distributed, if:

a) the distribution would result in a breach of any covenant or undertaking given by any Group Company (Group Companies are defined in the articles of association) to any lender or would, in the opinion of the simple majority of those present at the relevant meeting of the Board of Directors, be likely to cause such breach within the following 12 months; or

b) the Board of Directors resolves by way of a simple majority of those present at the relevant meeting of the Board that the distribution is materially prejudicial to the interests of any Group Company (as defined in the articles of association of the Company) having regard to: (i) implementation of the investment program approved by the Board of Directors in the business plan or the budget; or (ii) the trading prospects of the Group Companies (as defined in the articles of association of the Company) and the need to maintain the sound financial standing of the group companies.

In accordance with the Turkish Commercial Code, companies are required to assign legal reserves before profit appropriations. The legal reserve consists of first and second legal reserves, allocated in accordance with the Turkish Commercial Code. The first legal reserve is allocated out of last period's statutory profits at the rate of 5% per annum until the total reserve reaches 1/5 of the paid-in share capital (not indexed to the inflation). The second legal reserve is allocated after the first legal reserve and dividends, at the rate of 10% per annum of all cash dividend distributions

### *Dividends*

The Board of the Directors decided to distribute a dividend of TL gross 1.872.535 and decision was approved on March 19, 2021 at the Ordinary General Assembly Meeting for the 2020 operating year. The cash dividend (0,53501 full Kuruş gross for each share) has been paid in full as of the report date.

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 22. PAID IN CAPITAL, RESERVES AND RETAINED EARNINGS (CONTINUED)

***Other reserves***

The amounts transferred directly to equity, instead of statement of profit or loss as of the reporting date are as follows:

| | 31 December 2021 | 31 December 2020 |
|---|---|---|
| Gains on revaluation of property, plant and equipment | 5.231.590 | 4.766.342 |
| Currency translation differences | 1.555.755 | 721.066 |
| Gains due to change in fair value of financial liability attributable to change in credit risk of liability | 76.534 | (88.747) |
| Transfer of share based payments reserve to accumulated comprehensive income | (11.840) | – |
| Cash flow hedge reserve | 876.407 | (320.668) |
| Reserve for hedge of net investment in a foreign operation | (1.157.022) | (593.149) |
| Losses on change in value of time value of options | (4.074.549) | (717.854) |
| Actuarial loss arising from employee benefits | (911.454) | (782.420) |
| Other reserves from acquisition of subsidiary | (1.320.942) | (1.320.942) |
| | **264.479** | **1.663.628** |

*Reserves on hedges of net investment in foreign operations*

The Company recognizes the differences arising on the translation of monetary items that are associated with the hedge of net investment in a foreign operation in other comprehensive income (Note 15).

*Cash flow hedge reserve*

The Group entered into interest rate swaps in order to hedge it position against changes in interest rates. Accordingly, ineffective fair value changes of these instruments are reclassified from cash flow hedge reserve to retained earnings.

***Earnings / losses per share***

The calculation of the basic earnings / losses per share attributable to the ordinary equity holders of the Company is as follows:

| | 1 January - 31 December 2021 | 1 January - 31 December 2020 |
|---|---|---|
| Weighted average number of ordinary shares outstanding during the year | 350.000.000.000 | 350.000.000.000 |
| Net profit / (loss) for the year attributable to equity holder of the Company | 5.761.454 | 3.177.873 |
| Basic earnings / (losses) per share (in full Kuruş) | 1,6461 | 0,9080 |

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 23. SHARE BASED PAYMENT

According to the Turkish Council of Ministers decision dated 12 December 2007, which was published in the Turkish Official Gazette on 26 December 2007, 52.500.000.000 (45%) shares of Türk Telekom owned by the Treasury, the minority shareholder of Türk Telekom, has been sold as of 15 May 2008, through an initial public offering ("IPO") (such shares correspondence to corresponding to 15% Türk Telekom's shares). During the IPO, 12.299.160.300 of such shares have been allocated to the employees of Türk Telekom, PTT and small investors together with 5.220.503.800 shares allocated to domestic investors with high purchasing power with discounted price varying according to the payment terms and application date (compared to the price applied to the other corporate investors for the remaining shares of 34.980.335.900. The discounts provided to Türk Telekom employees have been considered as within the scope of IFRS 2 ("Share Based Payment") by the management of Türk Telekom considering the fact that Türk Telekom receives services from its employees.

| | |
|---|---|
| The market price during the IPO : | TL 4,60 |
| The average price applied to the employees of Türk Telekom : | TL 4,2937 |
| The number of shares sold to Türk Telekom's employees (lot) : | 31.104.948 |

The management of Türk Telekom decided that the discounts provided to PTT's employees, small investors and domestic investors with high purchasing power are not within the scope of IFRS 2 by considering the fact that;

a) Türk Telekom has not received any benefits (goods and services) in exchange for the discounts provided these groups to and

b) The Treasury provided these discounts not as a party acting as a shareholder of Türk Telekom but rather as a State Authority in order to increase the number of small investors as it has been done in all other privatization enhanced through an IPO.

The fair value of the discounts provided to these groups amounts to approximately TL 34.000 in 2008, at the year of the transaction.

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 24. COMMITMENTS AND CONTINGENCIES

Guarantees received and given by the Group are summarized below:

| | | 31 December 2021 | | 31 December 2020 | |
|---|---|---|---|---|---|
| | | **Original currency** | **TL** | **Original currency** | **TL** |
| Guarantees received | **USD** | 123.260 | 1.642.932 | 130.434 | 957.454 |
| | **TL** | 1.471.649 | 1.471.649 | 1.129.576 | 1.129.576 |
| | **EUR** | 26.645 | 401.985 | 23.518 | 211.852 |
| | **GBP** | 4 | 68 | – | – |
| | | | **3.516.634** | | **2.298.882** |
| Guarantees given (*) | **USD** | 168.053 | 2.239.982 | 168.434 | 1.236.391 |
| | **TL** | 1.019.553 | 1.019.553 | 706.306 | 706.306 |
| | **EUR** | 74.604 | 1.125.534 | 72.106 | 649.523 |
| | | | **4.385.069** | | **2.592.220** |

(*) Guarantees given amounting to USD 151.500 (31 December 2020: USD 151.500) is related to the guarantee provided to the ICTA by TT Mobil with respect to the TT Mobil Concession Agreement, guarantees given amounting to EUR 12.840 (31 December 2020: EUR 12.840) is related with the guarantee provided for 3G license and guarantees given amounting to EUR 57.281 (31 December 2020: EUR 57.281) is related with the guarantee provided for 4.5G license.

The Company's guarantee, pledge and mortgage (GPM) position as at 31 December 2021 and 31 December 2020 is as follows:

| | 31 December 2021 | 31 December 2020 |
|---|---|---|
| A. GPMs given on behalf of the Company's legal personality | 4.385.069 | 2.592.220 |
| B. GPMs given in favour of subsidiaries included in full consolidation | 1.771.068 | 1.155.067 |
| C. GPMS given by the Company for the liabilities of 3rd parties in order to run ordinary course of business | 938.253 | 780.363 |
| D. GPMS given in favour of other group companies that are not in the scope of B and C | 2.508 | – |
| **Total** | **7.033.398** | **4.527.650** |

Based on law 128/1 of Turkish Code of Obligations, the Group has given guarantee to distributors amounting to TL 938.253 for the financial obligation that would arise during the purchase of devices that will be sold as commitment sales by the Group (31 December 2020: TL 780.363). The guarantees have given to the banks TL 201.224, TL 168.437 Akbank T.A.Ş. and Türkiye Garanti Bankası A.Ş. respectively.

## 24. COMMITMENTS AND CONTINGENCIES (CONTINUED)

### Other commitments

The Group has purchase commitments for sponsorships, advertising and insurance services at the equivalent to TL 517.939 (31 December 2020: TL 7.300) as at 31 December 2021. Payments for these commitments are going to be made in a 7-year period.

The Group has purchase commitments for fixed assets amounting to USD 592.445, EUR 693.110 and TL 250.710 equivalent to TL 1.536.265 (31 December 2020: TL 919.484) as at 31 December 2021.

***Türk Telekom concession agreement***

The Concession Agreement was entered into between the Company and ICTA on 14 November 2005 following the privatization of the Company and the resultant reduction in the public shareholding to less than 50%. The Concession Agreement covers:

-the performance of the telecommunications services which are within the scope of the Agreement;

-the establishment and operation of necessary telecommunications facilities and the submission of these facilities to the use of other operators or persons and institutions making a demand as per the law;

-the marketing and provision of telecommunications services.

The Concession Agreement places an obligation on the Company, in the event of termination or non-renewal of the Concession Agreement, to transfer all equipment affecting the operation of the system together with all its functions and in good condition, and all immovable properties where such equipment is installed and which the Company uses, to the ICTA, or to any other institution to be designated by ICTA, at no cost.

In case ICTA determines that the Company has not fulfilled its obligations stemming from the Concession Agreement and has not corrected the situation within a period granted to it, or that there is a court decision on bankruptcy or composition against the Company, the Company is granted a grace period of not less than 90 days commencing from written notification by ICTA, to fulfil its obligations. Within this grace period, the Company submits a remedy program for its abovementioned obligations to ICTA. In case ICTA accepts the remedy program, the matters in dispute shall be re-examined at the end of the program provided. If the program is not accepted, then ICTA may terminate the Concession Agreement upon expiry of the period granted to the Company.

The Concession Agreement also places a number of obligations with respect to delivering services on the Company in relation to the provision of telecommunications services.

The Concession Agreement requires that the Company shall meet all payments accrued as a result of the Concession Agreement and the establishment and operation of the telecommunication network in accordance with the applicable legislation or agreements concluded by the Government of the Republic of Turkey. These payments specifically include the permit and utilization fees for the use of frequencies. In addition, the Company is required to pay the ICTA 0,35% of its net sales revenue, as contribution share towards ICTA's expenses.

## 24. COMMITMENTS AND CONTINGENCIES (CONTINUED)

***Türk Telekom concession agreement (continued)***

Under the Concession Agreement, requests for access in relation to the infrastructure should be met to the extent technically possible and without discrimination. The Company is further required to publish reference access and interconnection offers approved by the ICTA.

The Concession Agreement also contains an obligation on the Company to provide universal services. According to article 6 entitled "Revenues for Universal Service" of the Universal Service Law No:5369, the Company declares the amount of 1% of its net sales revenue to the Ministry of Transport, Maritime Affairs and Communications until the end of April of the following year and the company inform up to the following month. This amount shall be transferred within the same period to the account of the central accounting department of the Ministry and shall be registered as revenue in the budget under the name of "Revenues for Universal Service".

The tariffs to be charged by the Company are subject to the approval of the ICTA unless expressly provided to the contrary in any regulation issued by the ICTA.

The content of customer bills is governed by relevant laws and regulations. It is possible to issue a separate invoice for each service, as well as to issue one single invoice for more than one service rendered to a subscriber. The cost of each service shall be demonstrated separately, in the event of preparation of one single invoice for more than one service. A detailed bill is sent to the subscribers upon request, to the extent technically possible and subject to the payment of a fee.

Other provisions of the Concession Agreement provide for the confidentiality of communications and the establishment of effective methods to answer customer complaints.

***TT Mobil GSM and IMT-2000/UMTS concession agreement and IMT Authorization Certificate***

Regarding to Gsm and IMT-2000/UMTS concession agreement and IMT Authorization Certificate, the Company shall provide fixed guarantee by cash and/or letter of bank guarantee amounting to 6% of the Company's Licence fee and right of use fee. In case it is identified that TT Mobil does not fulfil its contractual obligations, ICTA will have the right to record as revenue these guarantees.

***Concession Agreement for Licensing of Establishment and Operation of GSM-1800 Digital Cellular Mobile Telephone System***

A concession agreement was entered into between TT Mobil and the ICTA ("the TT Mobil Concession Agreement") on 12 January 2005 which replaced and superseded the previous GSM 1800 license agreements in place in relation to Aycell and Aria. After GSM 900 Frequency Band bidding done by ICTA on 20 June, 2008, agreement was rearranged, the contract ("the TT Mobil Concession Agreement") was rearranged after the Authorization Tender for IMT Services and Infrastructures made by ICTA on 26 August 2015.

The TT Mobil concession agreement covers the establishment, development and operation of a GSM 1800 network and delivery of the system to the Authority or the establishment to be designated by the Authority at the end of the contracted term as being in an operating condition.

Pursuant to the TT Mobil Concession Agreement, TT Mobil was granted to use 75 channels in the 1800 MHz band and 12 channels in the 900 MHz band. The term of the TT Mobil Concession Agreement is 25 years from 11 January 2001.

## 24. COMMITMENTS AND CONTINGENCIES (CONTINUED)

***Concession Agreement for Licensing of Establishment and Operation of GSM-1800 Digital Cellular Mobile Telephone System (continued)***

TT Mobil may apply to the ICTA for renewal between dates 24 and 6 months before the end of TT Mobil Concession Agreement. ICTA may renew the license of TT Mobil by evaluating the renewal request according to legislation on that date. In the event of expiry or non-renewal, TT Mobil is under an obligation to transfer the network management center, being the central operation units of the GSM 1800 system, gateway switchboards and central subscription works systems (including all kinds of technical hardware), together with all equipment affecting the operation of the system and the immovable properties used by TT Mobil to the ICTA or to the establishment to be designated by ICTA at no cost.

TT Mobil is also committed to renew the network in line with technological improvements and international agreements and maintain the adequacy of the network by means of technology until the end of the agreement.

License fees were paid prior to the issuance of the concession agreement by TT Mobil.

TT Mobil provided a performance bond in the amount of USD 151.500. TT Mobil, additional to that bond, provided performance bond amounting TL 760 corresponding to 6% of bidding amount after GSM 900 Additional Frequency Band bidding by ICTA on 20 June 2008. Should the operator be understood to not perform its contractual obligations, the Authority shall record and confiscate the final guarantee as income.

The TT Mobil Concession Agreement provides that the license may be transferred with the approval of the ICTA and within the terms of the Authorization Ordinance. However, no transfer may be made to an entity which already has a GSM 900 or GSM 1800 license in Turkey, or to related parties of such an entity, to the companies or subsidiaries which is owned or managed somehow by shareholders of entity or to the management of such entity and their first and second blood relatives and relative affinities. In cases such issues are determinate; GSM 1800 license given to them by ICTA is cancelled.

Regarding transfer of shares regulation clauses at the date of the transaction will be applied. The approval of the Competition Authority is also required for any change of control, being a transfer of the shares.

***Fund payable to the Treasury***

TT Mobil will pay an amount equal to 15% of the gross sales on a monthly basis to the Treasury, except for the default interest imposed on their subscribers for their late payments, indirect taxes, financial obligations such as charges and fees, amounts obtained by the operator from other mobile operators regarding the installation and operation of the facilities where the mobile base stations are located, remunerations booked in the legal accounting records, which were corrected within the fiscal year, due to the: mistakes in the form or content of the invoice (such as customer information, type, amount, price and amount of the work), mistakes regarding the periods of the service, duplicated;(double charged) invoices, and the accrual amounts accounted for reporting purposes.

***Contribution share to the ICTA***

TT Mobil shall pay 0,35% of the annual net sales to the ICTA as contribution share to the ICTA's expenses, latest on the last working day of April of the following year.

## 24. COMMITMENTS AND CONTINGENCIES (CONTINUED)

***Concession Agreement for Licensing of Establishment and Operation of GSM-1800 Digital Cellular Mobile Telephone System (continued)***

***Coverage area***

TT Mobil has guaranteed and undertook to cover (up to 2 Watt outdoors) at least 50% of the population of Turkey within three years after 11 January 2001 and at least 90% of the population of Turkey within five years after 11 January 2001. However, the localities where there are less than 10.000 inhabitants shall not be taken into consideration. This coverage area refers to the area to be covered by TT Mobil alone and will not be contributed by national roaming. Upon request of the ICTA, yearly utmost two settling areas shall be covered with priority by TT Mobil. TT Mobil has completed its related liabilities with respect to coverage on 31 December 2004.

***Service offerings***

TT Mobil agrees and undertakes to provide the services specified within the frame of GSM memorandum of understanding applied by GSM association including, but not limited to the services specified by GSM license agreement (call forwarding, barring of outgoing and incoming calls, technical assistance for subscribers and free call forwarding to police and other public emergency services).

***Service quality***

TT Mobil will comply with the telephone service quality standards set down in the International Telecommunication Union ("ITU-T") recommendations in the GSM 1800 international standards. These standards require blocking rate of the licensed indoor network to be 5% and the call failure rate not to be more than 2%.

***Tariffs***

TT Mobil may freely determine its tariffs provided that these tariffs are not contrary to the regulations of the ICTA.

***Emergencies***

TT Mobil will take the necessary measures with priority in order to satisfy the requirements and the needs of subscribers and users in emergencies, provided that the public authorities and enterprises will have priority in the case of health and security emergencies or fire and other disasters. TT Mobil has to provide at least two base stations for the use of Ministry of Transport, Maritime Affairs and Communications in emergency.

***Investment plans***

TT Mobil pursuant to the relevant regulation, until the first day of December every year, TT Mobil will present its investment plan for the following calendar years to the ICTA. These plans will be valid for 3 years and will contain information about the dynamic demand forecasts, and number and locations of the exchange stations, base stations and base control stations to be established, the period of operation, and the investment costs. Within 120 days of receipt of the investment plan, the ICTA will approve the compliance of plans to the article $6^{th}$ of the agreement. Investment plan will be presented so as to inform the ICTA after the requirements arising from the article $6^{th}$ of the agreement are met.

## 24. COMMITMENTS AND CONTINGENCIES (CONTINUED)

***Concession Agreement for Licensing of Establishment and Operation of GSM-1800 Digital Cellular Mobile Telephone System (continued)***

***National roaming***

TT Mobil may enter into contracts with other licensed GSM networks in Turkey for national roaming purposes. Roaming contracts and the financial clause of the contracts has to be presented to ICTA before signature procedures completed.

***Suspension of operations***

If deemed necessary for public security and national defence in case of war, general mobilization, etc. the Authority may temporarily or permanently suspend all or a part of the operational activities of TT Mobil and may directly operate the network. The period of suspension as above will be added to the term of the license and the income of such a period, if any, will belong to TT Mobil.

***Termination of the agreement by the ICTA***

The ICTA may cancel the license or terminate the Agreement for the following reasons;

i) A final judgment of the competent courts for insolvency of TT Mobil or its composition with creditors,

ii) Determination of the failure of TT Mobil to perform its contractual obligations hereunder and to remedy its default in a reasonable period of time granted,

iii) Determination that TT Mobil extends its activities beyond the frequencies allocated hereunder or other frequencies that may be allocated by the ICTA to TT Mobil for use in the GSM 1800 System, and failure of TT Mobil to cease such activities in a reasonable period of time granted,

iv) Failure of TT Mobil to pay the license fees hereunder.

However, that except for point (iv) above, TT Mobil will be given the opportunity to fulfil its obligations within a period not less than 90 days of written notice by the ICTA. During this period of time, TT Mobil will furnish to the ICTA a corrective action program for fulfilment of its obligations. If this program is accepted by the ICTA, the points of disagreement will be revised at the end of the program. If this program is not acceptable, the ICTA may terminate the Agreement at the end of the time period provided to TT Mobil. Upon termination of the Agreement, TT Mobil shall transfer all of the GSM 1800 system equipment to the ICTA without any remuneration.

***Insurance***

TT Mobil will maintain adequate all risk insurance for the telecommunication facilities and services established and operated until the end of the license term.

## 24. COMMITMENTS AND CONTINGENCIES (CONTINUED)

***Concession Agreement of the Establishment and Operation of IMT2000/UMTS Infrastructures and Provision of Services***

The Concession Agreement with ICTA has been signed on 30 April 2009 and TT Mobil has been granted with 3G license for an amount of EUR 214.000 excluding VAT. The term of the license is 20 years effective from the signature date of the Agreement. 3G services have been launched on 30 July 2009. The contract ("the TT Mobil Concession Agreement") was rearranged after the Authorization Tender for IMT Services and Infrastructures made by ICTA on 26 August 2015.

According to this Agreement;

i. TT Mobil shall provide subscribers' and users' 112 calls and other emergency situation calls to public security institutions and other public institutions, and to direct those calls to the centres requested by the said institutions, free of charge bearing all costs.

ii. TT Mobil shall keep at least 2 units of IMT-2000/UMTS mobile base stations to be used in emergency situations under the request of the Ministry of Transport and Communication.

iii. Within the first 5 years by the signature of the Agreement, TT Mobil shall obtain the approval of the ICTA for each assignment of TT Mobil shares in ratio exceeding 10% to persons and entities other than the current shareholders and subsidiaries of the current shareholders. Any type of share assignment leading a change in the control of TT Mobil shall be subject to the approval of the ICTA.

iv. TT Mobil has granted a bank letter of guarantee amounting to EUR 12.840 which is 6% of the license fee, for to act as final guarantee. Should the TT Mobil be understood to not perform its contractual obligations; ICTA shall record and confiscate the final guarantee as income. In such confiscation of final guarantee as income is realized, TT Mobil shall grant new final guarantee within 30 days. Should the new final guarantee not granted within the said period, the Agreement might be terminated.

v. During the term of the Agreement, TT Mobil shall each year submit its investment plan related to the subsequent calendar year, till 1 December to the ICTA. This plan shall be prepared for three years and shall include such information as the number, location, coverage areas, investment costs with respect to exchange centres, base stations and control stations to be established, as well as the realization ratio of the previous year's investment plan and reasons of deviation, if any.

vi. TT Mobil will pay an amount equal to 15% of the gross sales on a monthly basis to the Treasury, except for the default interest imposed on their subscribers for their late payments, indirect taxes, financial obligations such as charges and fees, and the accrual amounts accounted for reporting purposes.

vii. TT Mobil shall pay 0.35% of the annual net sales to the ICTA as contribution share to the ICTA's expenses, latest on the last working day of April of the following year.

## 24. COMMITMENTS AND CONTINGENCIES (CONTINUED)

***Concession Agreement of the Establishment and Operation of IMT2000/UMTS Infrastructures and Provision of Services (continued)***

***Coverage Area Obligations***

Following the signature of the Agreement, TT Mobil shall have under coverage the population within the borders of;

- metropolitan municipalities within 3 years,
- all the municipalities of all provinces and districts within 6 years,
- all the residential locations having a population of more than 5.000 within 8 years,
- residential locations having a population of more than 1.000 within 10 years.

These are the areas which are to be covered by TT Mobil alone and this obligation shall not be fulfilled through roaming.

TT Mobil should maintain service quality in accordance with ICTA regulations, ETSI (European Telecommunications Standards Institute) standards and ITU (International Telecommunication Union) standards, decisions and recommendations given by ITU.

Upon request of the ICTA, yearly utmost two settling areas shall be covered with priority by TT Mobil.

If there is any delay in fulfilment of the coverage area obligations, except the force major conditions, an administrative fine shall be applied within the frame of Relevant Legislation. If there is any delay in fulfilment of the coverage area obligations for a period of more than two years, then the Agreement might be terminated by the ICTA.

***The Investments for hardware and software being used in the electronic communications network***

Except for the investments made in the lease of place, towers, piles, pipes, containers, channels, energy transfer lines and similar infrastructure plants; each year TT Mobil shall fulfil the following requirements for its investments related to electronic communications network (hardware, software etc.);

a) To procure at least 40% of such investments from vendor companies employing a R&D center established in Turkey and engaged in developing R&D projects in relation with the information and communication technologies provided at least 200 engineers functioning in such company in the first year after the signature of the Agreement, at least 300 engineers in the second year and at least 500 engineers for the third and subsequent years or from vendor companies employing a R&D center with at least 150 engineers functioning in the first year after the signature of the Agreement, at least 250 engineers in the second year and at least 350 engineers for the third and subsequent years however such company to employ also a Technical Assistance Centre with at least 50 engineers in the said first year, at least 100 engineers in the second year and at least 150 engineers in the third and subsequent years.

A vendor company may not establish the R&D center and Technical Assistance Centre together with another vendor company; but may establish with a company, organization or institution resident in Turkey. The vendor company shall have at least 50% share of such centres. Said organization or institution resident in Turkey shall not employ other R&D centres and Technical Assistance Centres that have been established together with other vendor companies functioning in information and communication technologies area.

## 24. COMMITMENTS AND CONTINGENCIES (CONTINUED)

***Concession Agreement of the Establishment and Operation of IMT2000/UMTS Infrastructures and Provision of Services (continued)***

***The Investments for hardware and software being used in the electronic communications network (continued)***

The university associates may also be employed part time, as engineers to be employed by the vendor company. The number of the university associates may not exceed 5% of the total number of engineers stated above.

TT Mobil is obliged to perform its investments regarding the electronic communications network by auditing and determining whether vendor companies comply with the foregoing terms and conditions.

b) To procure at least 10% of such investments from the vendors in quality of Small and Medium Sized Entities and established in Turkey for the purpose of product and system development.

All the independent software and hardware units to be used in the network of TT Mobil shall have open interface connections with each other.

ICTA may perform audits regarding the execution of this obligation or may commission another organization or institution to perform such auditing when deems necessary. The costs to arise from such audits shall be paid by TT Mobil.

Should TT Mobil be understood to procure goods and services through methods against the foregoing terms and conditions, an administrative monetary penalty shall be applied to TT Mobil up to 1% of its turnover of the previous calendar year.

Should TT Mobil not perform the said obligations, a penalty as 40% of total amount of its investments in the network (hardware, software etc.), except for the investments for lease of place, towers, piles, pipes, containers, channels, energy transfer lines and similar infrastructure plants, shall be applied separately to TT Mobil for each year. This clause is valid for the first three years following the signature date of the Agreement. Annual periods start with the signing of the concession agreement.

**Termination of the Agreement by ICTA:**

The Authority might terminate the Agreement for the following reasons:

- A bankruptcy or bankrupt's certificate decision on TT Mobil given by the judicial authorities,
- TT Mobil not performing some of its contractual obligations and not correcting such breach in the given period,
- TT Mobil operating under the frequencies other than the ones allocated to itself by ICTA,
- Termination of TT Mobil Concession Agreement
- TT Mobil not performing national roaming obligation stated in the contract

In such circumstances, ICTA gives TT Mobil the opportunity to fulfil its obligations within 90 days after the written notice. In case TT Mobil cannot fulfil all the obligations within this period, the Agreement will be terminated by ICTA. The license fee or any other fee is not reimbursable in case of a termination of agreement. In the case of cancellation of agreement by ICTA, TT Mobil will alienate all data and documents which constitute system, software affecting the running of system (including tower, beam, blare, container, channel, energy transmission lines, antenna etc), stated and in the usage of TT Mobil to ICTA or to the entity ICTA enounces by making sure that there is no pledge, mortgage, levy and related legal blockages on them and they are free of cost and works free of problems.

## 24. COMMITMENTS AND CONTINGENCIES (CONTINUED)

***Concession Agreement of the Establishment and Operation of IMT2000/UMTS Infrastructures and Provision of Services (continued)***

***The Investments for hardware and software being used in the electronic communications network (continued)***

The contract ("the TT Mobil Concession Agreement") was rearranged after the Authorization Tender for IMT Services and Infrastructures made by ICTA on 26 August 2015.

TT Mobil has been authorized to provide IMT service and Limited Use Authorization Certificate on 27 October 2015.

According to the Authorization Certificate;

i) TT Mobil shall provide emergency call services in line with the regulations of ICTA, free of charge bearing all costs and comply with the regulations of ICTA in relation to this matter.

ii) TT Mobil shall keep at least 2 mobile base stations so as to be used for the provision of IMT services upon the Ministry's request, in the case of disaster and emergency.

iii) Within the first 5 years by the signature of the Agreement, TT Mobil shall obtain the approval of the ICTA for each assignment of TT Mobil shares in ratio exceeding 10% to persons and entities other than the current shareholders and subsidiaries of the current shareholders. Any type of share assignment leading a change in the control of TT Mobil shall be subject to the approval of the ICTA.

iv) TT Mobil has granted a bank letter of guarantee amounting to EUR 57.300 which is 6% of the total fee, for to act as final guarantee. Should be understood that TT Mobil to not perform its contractual obligations; ICTA shall record and confiscate the final guarantee as income. In such confiscation of final guarantee as income is realized, TT Mobil shall grant new final guarantee within 30 days. Should the new final guarantee not granted within the said period, the Authorization might be terminated by ICTA.

v) TT Mobil will pay an amount equal to 15% of the gross sales on a monthly basis to the Treasury, except for the default interest imposed on their subscribers for their late payments, indirect taxes, financial obligations such as charges and fees, and the accrual amounts accounted for reporting purposes.

vi) TT Mobil shall pay the administrative fee at the rate and in the way determined by ICTA in accordance with the applicable law.

***Coverage Area Obligations***

Following the authorization, Additionally, following the authorization, TT Mobil shall put at least;

- 95% of Turkey's population within 8 years,
- 90% of the population in each province and district within 8 years,
- 99% of highways, high speed and very high speed train routes and tunnels longer than 1 km within 3 years,
- 95% of divided highways within 6 years,
- 90% of conventional train routes within 10 years.

## 24. COMMITMENTS AND CONTINGENCIES (CONTINUED)

***Concession Agreement of the Establishment and Operation of IMT2000/UMTS Infrastructures and Provision of Services (continued)***

***Coverage Area Obligations(continued)***

under coverage. Additionally, following the authorization, TT Mobil shall put at least; 99% of highways, high speed and very high speed train routes and tunnels longer than 1 km added after the first year within 2 years of its entering into service, 95% of divided highways added after the fourth year within 2 years of its entering into service, 90% of conventional train routes added after the eight year within 2 years of its entering into service under coverage.

Areas covered by TT Mobil pursuant to the IMT-2000/UMTS Concession Agreement shall be deemed to be also covered under this authorization on condition that the service quality criteria set forth in the respective article are satisfied. Additionally, areas covered by TT Mobil under this authorization for the purpose of provision of IMT services shall be deemed to be covered in the determination of the coverage obligation of IMT-2000/UMTS services.

Coverage obligation shall be fulfilled by TT Mobil on its own and not through national roaming. However, TT Mobil shall be entitled to share radio access network in the areas under the coverage obligation.

Maximum two settlements per year shall be primarily brought by TT Mobil under coverage upon ICTA's request and under the service quality standards determined for such areas.

In the event that the fulfilment of coverage obligation is delayed for any reason other than force majeure events, administrative fine shall be applied pursuant to the applicable law. In the event that the fulfilment of the coverage obligation is delayed for more than two (2) years, the Authorization might be terminated by ICTA.

***Service quality obligation***

TT Mobil shall ensure data download at minimum 2 Mbps in the areas subject to coverage obligation at a probability of 95% per user. The matters related to the inspection of this obligation shall be determined by ICTA.

These data transmission speeds are minimum values and ICTA shall determine service quality obligations required to be ensured by TT Mobil considering ETSI standards, ITU standards, decisions and recommendation, our national development targets, technological improvements and user requirements.

***Sharing the Radio Access Network***

On condition that the provisions of the applicable law are not breached, TT Mobil may install and operate the radio access network to be installed for the provision of IMT services together with other operators authorized to provide IMT services and further, lease necessary transmission lines from authorized operators in order to materialize the connections within the radio access network.

This right shall not remove the obligations of TT Mobil under the authorization and shall not constitute a reason for non-fulfilment of such obligations. TT Mobil shall not avoid fulfilling its obligations under the authorization due to reasons arising from the sharing. TT Mobil shall, in the case of sharing, be obliged to take all measures required to prevent any interruption of services it provides under the authorization.

## 24. COMMITMENTS AND CONTINGENCIES (CONTINUED)

***Concession Agreement of the Establishment and Operation of IMT2000/UMTS Infrastructures and Provision of Services (continued)***

***Sharing the Radio Access Network (continued)***

In all settlements having a population less than 10.000, TT Mobil shall, following the authorization, be obliged to:

a) install antenna facilities to be installed under the authorization (excluding in-building antenna facilities) in such manner that facilitates active sharing of radio access network with other operators and share such facilities with the operators,
b) In the event that there exist any antenna facilities installed by other operators at the settlements in question following the authorization for the antenna facilities to be newly installed by TT Mobil under this authorization, TT Mobil shall use such antenna facility by active sharing of radio access network.

Following this authorization, the antenna facilities newly installed under IMT-2000/UMTS Concession Agreements shall also be subject to the obligation prescribed by this paragraph.

TT Mobil shall be obliged to actively share radio access network in the antenna facilities to be newly installed under this authorization in order to cover highways, high speed railways and divided highways following the authorization. Following this authorization, the antenna facilities newly installed under IMT-2000/UMTS Concession Agreements shall also be subject to the aforementioned obligation.

***Investments and communication services related to the hardware and software used in the network***

Except investments made for property lease, tower, pole, pipe, container, conduit, power transmission lines and similar infrastructure; TT Mobil shall, following the authorization, be obliged to provide:

a) At least 40% of its investments and communication services related to the network (such as hardware, software);

Within two (2) years, from supplier companies established in Turkey as to develop R&D projects in the field of information and communication technologies, employing at least 500 engineers and 100 researchers; within four (4) years, from supplier companies having a R&D center, employing 500 engineers and 250 researchers, or within two (2) years, from supplier companies established in Turkey as to develop R&D projects in the field of information and communication technologies, employing at least 350 engineers and 100 researchers and also within two (2) years from supplier companies having a Technical Assistance Center employing at least 150 engineers, within four (4) years from supplier companies having R&D center employing 350 engineers and 250 researchers and within four (4) years from supplier companies having a Technical Assistance Center employing at least 150 engineers.

b) At least 10% of its investments from products produced in Turkey and from SMEs established to develop products and systems in Turkey.

## 24. COMMITMENTS AND CONTINGENCIES (CONTINUED)

***Concession Agreement of the Establishment and Operation of IMT2000/UMTS Infrastructures and Provision of Services (continued)***

***Investments and communication services related to the hardware and software used in the network (continued)***

Up to 60 within 2 years and up to 150 within 4 years following the authorization, of the personnel of TT Mobil employed in the status of researcher at the R&D centre established by TT Mobil for the purpose of developing R&D projects in the field of information and communication technologies shall be taken into account under the obligation related to the number of the researchers set forth in the sub-paragraph (a) of this paragraph provided that such center is organized as an independent unit under TT Mobil’s organization or all shares of the center are owned by TT Mobil.

Teaching staff of universities who work part-time at R&D centres under the applicable law or while working at universities carry out academic studies requested by the supplier and/or TT Mobil may be included in the researchers to be employed by the supplier and/or TT Mobil at R&D centres. The number of teaching staff may not excess 10% of total number of researchers referred to in this subparagraph (a).

A supplier company may establish R&D and technical assistance centers together with institutions or bodies, except other suppliers, established in Turkey, which operate in the field of information and communication technologies and do not have a R&D or technical assistance center established with other suppliers. The supplier companies must hold at least 50% of the shares of such centres.

All independent software and hardware units to be used by TT Mobil in the network shall be interconnected through explicit interfaces.

TT Mobil shall be obliged to materialize its investments and communication services relating to the network (such as hardware, software) by checking and verifying whether or not the supplier companies and Small Entities (“SME”) fulfil the conditions stated above.

TT Mobil shall be obliged to supply its investments and communication services relating to the network (hardware or software such as base station, switching, router), except investments relating to property lease, tower, pole, container, channel, power transmission lines and similar facilities, from the products determined to be domestic product under the Law No 4734 and applicable law at least by 30% within the first year, at least by 40% within the second year and at least by 45% within subsequent years following the authorization. Such items among the products supplied by the supplier companies and SMEs to TT Mobil, which are determined to be domestic products shall be taken into account under this obligation. TT Mobil contemplating that it will not be able to fulfil its obligations set forth in the this paragraph due to the availability condition of the products determined to be domestic products, supply capacity of the producers and other conditions shall apply to ICTA indicating the reasons, no later than six (6) months before the expiry of the obligation period. ICTA may reduce or terminate the obligation for the respective period if it deems necessary.

## 24. COMMITMENTS AND CONTINGENCIES (CONTINUED)

***Concession Agreement of the Establishment and Operation of IMT2000/UMTS Infrastructures and Provision of Services (continued)***

***Investments and communication services related to the hardware and software used in the network (continued)***

Additional to the obligation in the paragraph above; investments specified in the paragraph above, to be measured for periods of 4 years, following the authorization TT Mobil shall be obliged to supply from the products determined to be domestic product under the Law No 4734 and applicable law a minimum average of 30% in the first 4 years, 40% in the second 4 years and 45% in the third 4 years. Such items among the products supplied by the supplier companies and SMEs to TT Mobil, which are determined to be domestic products shall be considered under this obligation. TT Mobil contemplating that it will not be able to fulfil its obligations set forth in this paragraph due to the availability condition of the products determined to be domestic products, supply capacity of the producers and other conditions shall apply to ICTA indicating the reasons, no later than six (6) months before the expiry of the obligation period. ICTA, provided that Ministry's opinion to be taken, may reduce or terminate the obligation for the respective period if it deems necessary.

Whether or not the obligations under this article have been fulfilled shall be evaluated with the obligations of TT Mobil under the IMT-2000/UMTS Concession Agreement.

Cancelation of Authorization**:**

ICTA may terminate the Authorization Certificate for the following reasons;

- A bankruptcy or bankrupt's certificate decision on TT Mobil given by the judicial authorities,
- TT Mobil not performing some of its contractual obligations and not correcting such breach in the given period,
- TT Mobil operating under the frequencies other than the ones allocated to itself by ICTA and not ceasing these operation within the given period,
- Termination of one of TT Mobil's Concession Agreements signed earlier,
- TT Mobil not performing its obligations stated in the article related to confidentiality of the communication, national security and public order

In such circumstances, ICTA gives TT Mobil the opportunity to fulfil its obligations within 90 days after the written notice. In case TT Mobil cannot fulfil all the obligations within this period, the Authorization Certificate will be terminated by ICTA.

The license fee or any other fee is not reimbursable in case of a termination of agreement. In the case of cancelation of agreement by ICTA, TT Mobil will alienate all data and documents which constitute system, software affecting the running of system (including tower, beam, blare, container, channel, energy transmission lines, antenna etc), stated and in the usage of TT Mobil to ICTA or to the entity ICTA enounces by making sure that there is no pledge, mortgage, levy and related legal blockages on them and they are free of cost and works free of problems.

## 24. COMMITMENTS AND CONTINGENCIES (CONTINUED)

### Legal proceedings of Türk Telekom

### Disputes between the Group and the ICTA

The Company has filed various lawsuits against ICTA. These lawsuits are related with the sector-specific and tariff legislations and legislations with respect to the other operators in the market. The sector-specific disputes generally stem from the objections with respect to the provisions of interconnection legislation, legislation with respect to telecommunication services and infrastructure. According to the Article 99 of the Law numbered 7061 "Legislation on Amendment of Certain Tax Legislation and Other Certain Legislation" which was published on the Official Gazette numbered 30261 on 5 December 2017 and according to the sub-article 9 added to the Article 60 of the Law numbered 5809; customer returns that are not repaid to the customers within the 2-year period, shall be transferred to the Ministry of Transport and Infrastructure of the Republic of Turkey as revenue under the name of "Revenues for Universal Service". For the period ended 31 December 2021, customer returns amounted to TL 27.226 was transferred. As of 31 December 2021, TL 33.119 provision provided for ICTA penalties and amounts to be repaid to customers or to the Ministry of Transport and Infrastructure of the Republic of Turkey due to ICTA resolutions (31 December 2020: TL 59.531).

### TT Mobil Tax Inspections

Ministry of Treasury and Finance Turkish Tax Inspection Board has carried out a SCT and VAT review distribution of services subject to SCT and VAT rates for the 2017 accounting period within the same package revenues. On the other hand, 2018 Tax inspection report has not been notified yet as of 31 December 2021. The Company has recognized a provision amounting to TL 25.000 in the consolidated financial statements.

### The Ministry of Trade administrative fine

The Ministry of Trade conducted an audit at TTNET over the termination processes of subscription agreements and as a result of this investigation, Trade Provincial Directorate of Governorship of Istanbul has decided to impose an administrative fine amounting to TL 58.119 against TTNET. The management is assessing the settlement or taking legal actions in due time regarding the administrative fine which was notified to TTNET on 31 January 2022. The Company has recognized a provision amounting to TL 29.000 in the consolidated financial statements as of 31 December 2021.

### Other issues

Provision has been provided in the consolidated financial statements for the probable court cases against the Group based on the lawyers' assessments. The provision for such court cases amounts to TL 67.292 as of 31 December 2021 (31 December 2020: TL 61.171). For the rest of the cases, Group lawyers commented that basis of those cases are not realistic and should be appealed. Therefore, no provision has been provided for these cases.

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 25. SUPPLEMENTARY CASH FLOW INFORMATION

### *Other explanations*

| | Issued debt instruments | Bank borrowings | Lease liabilities | Derivative financial assets, net | Total |
|---|---|---|---|---|---|
| 1 January 2021 opening balance | (7.536.377) | (12.360.529) | (1.337.686) | 525.172 | (20.709.420) |
| Cash flows | - | 3.305.686 | - | 3.406.284 | 6.711.970 |
| Acquisition | - | (7.252.780) | (989.577) | (764.780) | (9.007.137) |
| Other non-cash changes | (5.724.161) | 1.204.244 | 887.803 | 405.631 | (3.226.483) |
| **31 December 2021 closing balance** | **(13.260.538)** | **(15.103.379)** | **(1.439.460)** | **3.572.307** | **(26.231.070)** |

"Other outflows of cash" in net cash used in operating activities amounting to TL 55.353 represents change in restricted cash (Note 4). "Other inflows of cash, net" in net cash used in financial activities amounting to TL 770.604 represents change in other financial payment. "Other adjustment for non-cash items" in adjustments to reconcile net profit to cash provided by operating activities amounting to TL 295.807 represents change in TFRS Interpretation 12.

## 26. SUBSEQUENT EVENTS

With the "Law on the Amendment of the Tax Procedure Law and the Corporate Tax Law", whose proposal was submitted on January 13, 2021 and accepted in the Grand National Assembly of Turkey on January 20, 2021, foreign exchange differences, interest, dividends and other incomes of companies that convert their foreign currency assets or various gold instruments into Turkish Lira and keep the Turkish lira assets thus obtained in time deposits and participation accounts with a maturity of at least three months are exempt from corporate tax. Since the changes made in tax laws after the reporting date are considered within the scope of "non-adjusting event after the reporting period" in accordance with TAS 10, they did not have an impact on the financial statements of the Group as of 31 December 2021.

## 27. REVENUE

| | 1 January - 31 December 2021 | 1 January - 31 December 2020 |
|---|---|---|
| Mobile | 11.499.619 | 9.866.913 |
| Broadband | 10.711.533 | 8.305.726 |
| Fixed voice | 2.728.458 | 2.718.328 |
| IFRIC 12 revenue | 2.571.246 | 1.770.242 |
| Corporate data | 2.356.906 | 2.052.640 |
| International revenue | 2.004.470 | 1.471.029 |
| TV | 423.664 | 382.778 |
| Other | 1.977.038 | 1.721.219 |
| | **34.272.934** | **28.288.875** |

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 28. OPERATING EXPENSES

| | 1 January - 31 December 2021 | 1 January – 31 December 2020 |
|---|---|---|
| Cost of sales | (19.404.441) | (15.705.138) |
| General administrative expenses | (2.735.464) | (2.320.713) |
| Marketing, sales and distribution expenses | (2.644.196) | (2.439.609) |
| Research and development expenses | (273.817) | (247.105) |
| | **(25.057.918)** | **(20.712.565)** |

## 29. EXPENSES BY NATURE

| | 1 January - 31 December 2021 | 1 January - 31 December 2020 |
|---|---|---|
| Personnel expenses | (4.697.951) | (3.867.855) |
| Taxes | (2.967.656) | (2.610.165) |
| TFRS Interpretation 12 related fixed assets additions and capex provision expenses | (2.275.439) | (1.557.809) |
| Repair and maintenance expenses | (1.502.591) | (1.198.271) |
| International interconnection | (1.500.646) | (1.087.133) |
| Domestic interconnection | (1.487.545) | (1.451.736) |
| Utilities | (1.127.503) | (837.909) |
| Cost of sales and cost of equipment sales of technology companies | (1.049.902) | (882.597) |
| Other expenses | (2.246.478) | (1.843.806) |
| **Total operating expenses (excluding depreciation and amortization expense)** | **(18.855.711)** | **(15.337.281)** |
| **Depreciation, amortization** | **(6.169.325)** | **(5.318.992)** |
| **Impairment expenses** | **(32.882)** | **(56.292)** |
| **Total operating expenses** | **(25.057.918)** | **(20.712.565)** |

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 30. OTHER OPERATING INCOME / (EXPENSE)

| | 1 January - 31 December 2021 | 1 January - 31 December 2020 |
|---|---|---|
| Interest and discount gains | 194.153 | 124.903 |
| Rental income | 127.981 | 107.160 |
| Litigation and indemnity income | 56.662 | 132.805 |
| Foreign exchange gains | 44.170 | 18.605 |
| Curtailment and settlement gain | 23.083 | – |
| Other | 156.850 | 95.093 |
| **Other operating income** | **602.899** | **478.566** |
| Foreign exchange losses | (1.331.113) | (277.355) |
| Litigation provision compensation and penalty expenses (*) | (231.676) | (53.458) |
| Interest expenses on employee benefit obligations (Note 21) | (88.915) | (88.429) |
| Discount losses | – | (72.353) |
| Other | (55.199) | (99.767) |
| **Other operating expense (-)** | **(1.706.903)** | **(591.362)** |

(*) Litigation provision, compensation and penalty expenses mainly consist of ICTA penalties, customer return provisions, group litigation provisions, Ministry of Commerce administrative fine and tax assessments in accordance with restructuring provisions as per the Law No. 7326.

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 31. INCOME / (EXPENSE) FROM INVESTING ACTIVITIES

| | 1 January - 31 December 2021 | 1 January - 31 December 2020 |
|---|---|---|
| Gain from scrap sales | 1.063.627 | 368.129 |
| Gain on sales of property, plant and equipment | 79.706 | 9.719 |
| **Income from investing activities** | **1.143.333** | **377.848** |
| Losses from sales on property, plant and equipment | (16.785) | – |
| **Expense from investing activities (-)** | **(16.785)** | **–** |

## 32. FINANCIAL INCOME / (EXPENSE)

| | 1 January - 31 December 2021 | 1 January - 31 December 2020 |
|---|---|---|
| Foreign exchange and derivative instruments gains | 4.889.475 | 870.717 |
| Interest income on bank deposits | 121.761 | 126.966 |
| Other | 4.184 | 654 |
| **Financial Income** | **5.015.420** | **998.337** |
| Foreign exchange and derivative instruments loss | (6.159.538) | (2.376.742) |
| Interest expense | (2.173.618) | (2.301.262) |
| Other | (112.808) | (81.102) |
| **Financial expenses** | **(8.445.964)** | **(4.759.106)** |
| **Financial expenses, net** | **(3.430.544)** | **(3.760.769)** |

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 33. TAXATION ON INCOME

| | 31 December 2021 | 31 December 2020 |
|---|---|---|
| Corporate tax payable: | | |
| Current corporate tax provision | 634.938 | 372.169 |
| Prepaid taxes and funds (-) | (474.424) | (199.713) |
| **Tax payable** | **160.514** | **172.456** |

| | 1 January -31 December 2021 | 1 January - 31 December 2020 |
|---|---|---|
| Tax expense: | | |
| Current tax expense: | | |
| *Current income tax expense* | (634.938) | (372.169) |
| *Adjustments in respect of income tax of previous year* | 17.388 | (1.579) |
| Deferred income (Note 11): | | |
| *Deferred tax income* | 758.162 | (250.320) |
| | **140.612** | **(624.068)** |

As of 31 December 2021 deferred tax expense amounting to TL 672.857 (31 December 2020: TL 115.395 income) are recognized in the consolidated statement of other comprehensive income.

The Company and its subsidiaries located in Turkey are subject to taxation in accordance with the tax regulations and the legislation effective in Turkey where the Group companies operate. Corporate tax returns are 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 instalment by the end of the fourth month.

In Turkey, corporate tax rate is 25% as of 31 December 2021. However, the corporate tax rate will be applied as 25% for the corporate income for the 2021 taxation period and 23% for the corporate income for the 2022 taxation period in accordance with the article 11 of the Law No. 7316 on the Procedure for Collection of Public Claims and the Law Amending Some Other Laws and included to the temporary article 13 of Law No. 5520 Corporate Tax Law which are published in the Official Gazette numbered 31462 on 22 April 2021. As of the nine month period ended 30 September, 2021, corporate tax provisions have been calculated and accrued at 25%. As of the twelve month period ended 31 December 2021, corporate tax provisions have been calculated and accrued at 25%.

The tax legislation provides for a temporary tax of 25% to be calculated and paid based on earnings generated for each quarter for the period ended 31 December 2021. The amounts thus calculated and paid are offset against the final corporate tax liability for the year.

With the "Law Amending the Tax Procedure Law and the Corporate Tax Law", which was accepted on the agenda of the Turkish Grand National Assembly on 20 January 2022, the application of inflation accounting was postponed starting from the balance sheet dated on 31 December 2023.

In Turkey, the tax legislation does not permit a parent company and its subsidiaries to file a consolidated tax return. Therefore, provision for taxes, as reflected in the consolidated financial statements, has been calculated on a separate-entity basis.

Corporate tax losses can be carried forward for a maximum period of five years following the year in which the losses were incurred. The tax authorities can inspect tax returns and the related accounting records for a retrospective maximum period of five years.

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 33. TAXATION ON INCOME (CONTINUED)

Dividend payments made to resident and non-resident individuals, non-resident legal entities and corporations resident in Turkey (except for the ones exempt from corporate and income tax), is subject to an income tax of 15%.

Dividend payments made from a corporation resident in Turkey to a corporation also resident in Turkey are not subject to income tax. Furthermore, income tax is not calculated in case the profit is not distributed or transferred to equity.

The dividend income (excluding the participation certificates of investment funds and profit shares derived from the share certificates of investment trusts) derived by entities from the participation in the capital of another resident entity is exempt from corporate tax. Furthermore, 50% of the income derived by entities from the sale of participation shares and real estates (immovable property) preferential rights, founders' shares and redeemed shares which are carried in assets at least for two years is exempt from corporate tax as of 31 December 2021.

In order to be able to benefit from the exemption, the relevant income should be kept under a fund account in the liabilities and should not be withdrawn from the enterprise for 5 years. The sales amount should be collected by the end of the second calendar year following the year of sale.

The reconciliation between tax expense and the product of accounting profit multiplied by applicable tax is as follows:

| | **1 January - 31 December 2021** | **1 January - 31 December 2020** |
|---|---|---|
| Profit / (loss) before tax | 5.620.842 | 3.801.941 |
| Tax at the corporate tax rate of (25%) | (1.405.211) | (836.427) |
| Tax effects of: | | |
| - Expenses that are not deductible in determining taxable profit | (316.212) | (52.124) |
| - Tax rate difference of subsidiaries | (6.245) | 1.735 |
| - Deferred tax asset recognition from cash capital increase | 302.587 | 27.242 |
| - Effect of tax losses, R&D investment incentive and investment allowances | 994.088 | 175.968 |
| - Effect of VUK revaluation under Law No. 7326 | 318.155 | – |
| - Effects of tax rate changes | 225.241 | 52.224 |
| - Adjustments and tax losses of subsidiaries not subject to deferred tax and other | 28.209 | 7.314 |
| **Tax income / (expense) for the year** | **140.612** | **(624.068)** |

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 34. FINANCIAL RISK MANAGEMENT OBJECTIVES AND POLICIES

Financial risk policies of the Group are managed centrally with the support of a committee. All Group companies meet their cash needs determined in business plans approved by their boards, by using credits or capital increase with guidance of the central management. The Group may choose long or short term financing according to their financing needs and market assumptions.

The Group's risk management policies are designed to identify and analyse the risks faced by the Group, to determine appropriate risks limits and controls, and to observe commitment to these limits. Risk management policies and systems are constantly under review to reflect changes in the Group's activities and market conditions.

The Group audit committee oversees how management monitors compliance with the Group's risk management policies and procedures and reviews the adequacy of the risk management framework in relation to the risks faced by the Group. The Group audit committee is assisted in its oversight role by internal audit. Internal audit undertakes both regular and ad hoc reviews of risk management controls and procedures, the results of which are reported to the audit committee.

### *Financial risk factors*

The Group's principal financial instruments comprise forward market transactions, bank loans and cash and short-term deposits. The main purpose of these financial instruments is to raise funds for the Group's operations and to hedge interest rate risk. The Group has various other financial assets and liabilities such as trade receivables and trade payables, which arise directly from its operations. The main risks arising from the Group's financial instruments are cash flow interest rate risk, liquidity risk, foreign currency risk and credit risk. The Board reviews and agrees to policies for managing each of these risks.

### *Credit risk*

| | Receivables | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | Trade Receivables | | Other receivables | | Contract assets | | | | |
| 31 December 2021 | Related Parties | Third Parties | Related Parties | Third Parties | Related Parties | Third Parties | Deposits and banks | Derivative Instruments | Other |
| Maximum credit risk exposed to as at the reporting date (A+B+C+D+E) | 53.869 | 6.656.479 | – | 151.660 | – | 1.007.052 | 7.696.351 | 4.039.063 | – |
| - Guaranteed portion of the maximum risk | – | 224.100 | – | – | – | – | – | – | – |
| A. Carrying amount of financial assets not overdue or not impaired | 53.869 | 5.398.407 | – | 151.660 | – | 1.007.052 | 7.696.351 | 4.039.063 | – |
| B. Carrying amount of financial assets with rediscussed conditions that are considered overdue or impaired if not rediscussed | – | – | – | – | – | – | – | – | – |
| C. Carrying amount of financial assets overdue but not impaired | – | 1.258.072 | – | – | – | – | – | – | – |
| -Amount secured via guarantees | – | – | – | – | – | – | – | – | – |
| D. Carrying amount of assets impaired | – | – | – | – | – | – | – | – | – |
| -Overdue (gross book value) | – | 3.946.503 | – | 43.136 | – | – | – | – | – |
| -Impairment (-) | – | (3.946.503) | – | (43.136) | – | – | – | – | – |
| E. Off balance sheet items with credit risk | – | – | – | – | – | – | – | – | – |

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 34. FINANCIAL RISK MANAGEMENT OBJECTIVES AND POLICIES (CONTINUED)

### *Credit risk (continued)*

| | Receivables | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | Trade Receivables | | Other receivables | | Contract assets | | | | |
| 31 December 2020 | Related Parties | Third Parties | Related Parties | Third Parties | Related Parties | Third Parties | Deposits and banks | Derivative Instruments | Other |
| Maximum credit risk exposed to as at the reporting date (A+B+C+D+E) | 15.334 | 5.488.810 | – | 101.221 | – | 979.926 | 5.007.626 | 1.240.177 | – |
| - Guaranteed portion of the maximum risk | – | 152.107 | – | – | – | – | – | | – |
| A. Carrying amount of financial assets not overdue or not impaired | 15.334 | 3.828.339 | – | 101.221 | – | 979.926 | 5.007.626 | 1.240.177 | – |
| B. Carrying amount of financial assets with rediscussed conditions that are considered overdue or impaired if not rediscussed | | | | | | | | | |
| C. Carrying amount of financial assets overdue but not impaired | – | 1.660.471 | – | – | – | – | – | – | – |
| -Amount secured via guarantees | – | – | – | – | – | – | – | – | – |
| D. Carrying amount of assets impaired | – | – | – | – | – | – | – | – | – |
| -Overdue (gross book value) | – | 3.754.151 | – | 41.366 | – | – | – | – | – |
| -Impairment (-) | – | (3.754.151) | – | (41.366) | – | – | – | – | – |
| E. Off balance sheet items with credit risk | – | – | – | – | – | – | – | – | – |

Financial losses due to Group's receivables and financial assets which result from not implementing agreement clauses related to financial assets by a customer or other party constitutes credit risk.

When determining the credit risk exposure as at the balance sheet date, items like guarantees received, which increase the credit worthiness have not been considered.

As of 31 December 2021, the maximum credit risk Company exposure is reflected by presenting all financial assets from carrying amount on consolidated balance sheet.

### *Liquidity risk*

Liquidity risk is uncertainty to cover future financial obligations.

The Group's objective is to maintain a balance between current assets and liabilities through close monitoring of payment plans and cash projections.

The Group manages current and long-term funding by maintaining adequate reserves, banking facilities, reserve borrowing facilities and loan agreements with suppliers through continuously monitoring forecast and actual cash flows and matching the maturity profile of financial assets and liabilities.

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 34. FINANCIAL RISK MANAGEMENT OBJECTIVES AND POLICIES (CONTINUED)

### *Liquidity risk (continued)*

The table below summarizes the maturity profile of the Group's financial liabilities at 31 December 2021 and 2020 based on contractual undiscounted payments (including interest payments not due yet).

| **Contract based maturities as of 31 December 2021** | **Book value** | **Total contract based cash outflow (I+II+III+IV)** | **Less than 3 months (I)** | **3 to 12 months (II)** | **1 to 5 years (III)** | **More than 5 years (IV)** |
|---|---|---|---|---|---|---|
| **Non-derivative financial liabilities** | | | | | | |
| Financial liabilities and issued debt instruments | 28.363.917 | 31.773.105 | 778.374 | 6.609.244 | 23.777.995 | 607.492 |
| Lease liabilities | 1.439.460 | 1.811.264 | 295.224 | 452.557 | 924.333 | 139.150 |
| Trade payables to unrelated parties | 7.729.147 | 7.729.147 | 7.608.294 | 120.853 | – | – |
| Other (*) | 1.509.123 | 1.509.123 | 1.468.823 | – | 40.300 | – |
| **Derivative financial liabilities, net** | **466.756** | **466.756** | **159.051** | **124.579** | **183.126** | **–** |

| **Contract based maturities as of 31 December 2020** | **Book value** | **Total contract based cash outflow (I+II+III+IV)** | **Less than 3 months (I)** | **3 to 12 months (II)** | **1 to 5 years (III)** | **More than 5 years (IV)** |
|---|---|---|---|---|---|---|
| **Non-derivative financial liabilities** | | | | | | |
| Financial liabilities and issued debt instruments | 19.896.906 | 22.176.476 | 2.331.279 | 3.933.936 | 15.565.130 | 346.131 |
| Lease liabilities | 1.337.686 | 1.710.422 | 248.187 | 337.490 | 1.001.846 | 122.899 |
| Trade payables to unrelated parties | 5.293.521 | 5.293.521 | 4.844.042 | 449.479 | – | – |
| Other (*) | 1.128.734 | 1.128.734 | 1.085.078 | – | 43.656 | – |
| **Derivative financial liabilities, net** | **715.005** | **715.005** | **210.941** | **298.335** | **205.729** | **–** |

(*) Other item includes other payables, employee benefit obligations and other current liabilities. Taxes and other payables contained within employee benefit obligations and advances contained within other current liabilities are excluded.

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 34. FINANCIAL RISK MANAGEMENT OBJECTIVES AND POLICIES (CONTINUED)

### *Market risk*

*Foreign Currency Risk*

| | 31 December 2021 | | | | 31 December 2020 | | | |
|---|---|---|---|---|---|---|---|---|
| | **Total TL Equivalent** | **USD** | **EUR** | **Other** | **Total TL Equivalent** | **USD** | **EUR** | **Other** |
| 1. Trade receivables | 607.012 | 35.871 | 7.760 | 11.813 | 219.329 | 27.396 | 1.171 | 7.682 |
| 2a. Monetary financial assets (Cash and banks accounts included) | 5.870.926 | 358.425 | 71.595 | 13.341 | 3.888.220 | 345.654 | 148.711 | 11.373 |
| 2b. Non-monetary financial assets | – | – | – | – | – | – | – | – |
| 3. Other | 50.622 | 230 | 3.152 | – | 1.069 | – | 119 | – |
| **4. Current assets (1+2+3)** | **6.528.560** | **394.526** | **82.507** | **25.154** | **4.108.618** | **373.050** | **150.001** | **19.055** |
| 5. Trade receivables | – | – | – | – | – | – | – | – |
| 6a. Monetary financial assets | – | – | – | – | – | – | – | – |
| 6b. Non-monetary financial assets | – | – | – | – | – | – | – | – |
| 7. Other | – | – | – | – | – | – | – | – |
| **8. Non-current assets (5+6+7)** | **–** | **–** | **–** | **–** | **–** | **–** | **–** | **–** |
| **9. Total assets (4+8)** | **6.528.560** | **394.526** | **82.507** | **25.154** | **4.108.618** | **373.050** | **150.001** | **19.055** |
| 10. Trade payables | 5.050.635 | 235.172 | 125.365 | 24.678 | 3.076.131 | 258.060 | 127.459 | 33.696 |
| 11. Financial liabilities | 6.234.302 | 310.985 | 138.053 | 6.417 | 2.976.888 | 274.313 | 101.153 | 52.111 |
| 12a. Monetary other liabilities | – | – | – | – | – | – | – | – |
| 12b. Non-monetary other liabilities | – | – | – | – | – | – | – | – |
| **13. Short-term liabilities (10+11+12)** | **11.284.937** | **546.157** | **263.418** | **31.095** | **6.053.019** | **532.373** | **228.612** | **85.807** |
| 14. Trade payables | – | – | – | – | – | – | – | – |
| 15. Financial liabilities | 21.949.229 | 1.339.512 | 270.365 | 15.952 | 14.138.721 | 1.503.858 | 343.623 | 4.329 |
| 16a. Monetary other liabilities | – | – | – | – | – | – | – | – |
| 16b. Non-monetary other liabilities | – | – | – | – | – | – | – | – |
| **17. Long-term liabilities (14+15+16)** | **21.949.229** | **1.339.512** | **270.365** | **15.952** | **14.138.721** | **1.503.858** | **343.623** | **4.329** |
| **18. Total liabilities (13+17)** | **33.234.166** | **1.885.669** | **533.783** | **47.047** | **20.191.740** | **2.036.231** | **572.235** | **90.136** |
| **19. Net asset/(liability) position of off balance sheet derivative instruments (19a-19b)** | **28.715.088** | **1.744.240** | **362.313** | **–** | **16.219.562** | **1.730.010** | **390.815** | **–** |
| 19a. Total asset amount hedged | – | – | – | – | – | – | – | – |
| 19b. Total liability amount hedged | (28.715.088) | (1.744.240) | (362.313) | – | (16.219.562) | (1.730.010) | (390.815) | – |
| **20. Loans defined as hedging instruments (*)** | **1.607.058** | **–** | **104.088** | **–** | **978.543** | **–** | **108.632** | **–** |
| **21. Net foreign currency asset/(liability) position (9-18+19+20)** | **3.616.540** | **253.097** | **15.125** | **(21.893)** | **1.114.983** | **66.829** | **77.213** | **(71.081)** |
| **22. Net asset/(liability) position of foreign currency monetary items (IFRS 7.B23) (=1+2a+5+6a-10-11-12a-14-15-16a)** | **(26.756.228)** | **(1.491.373)** | **(454.428)** | **(21.893)** | **(16.084.191)** | **(1.663.181)** | **(422.353)** | **(71.081)** |

(*) The Company utilized a loan amounting to EUR 104.088 in order to hedge its net investment in a foreign operation with a EUR functional currency. Foreign exchange gain and/or loss resulting from the subsidiary's net investment portion of this loan is reclassified to reserve for hedge of net investment in a foreign operation under equity.

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 34. FINANCIAL RISK MANAGEMENT OBJECTIVES AND POLICIES (CONTINUED)

***Market risk (continued)***

*Foreign currency risk (continued)*

The Group has transactional currency exposures mainly with respect to the financial liabilities and trade payables. Foreign currency denominated borrowings are stated in Note 5.

The following table demonstrates the sensitivity to a reasonably possible change in the USD and EUR exchange rate, with all other variables held constant, of the Group's net profit for the year (due to changes in the fair value of monetary assets and liabilities):

| **31 December 2021** | **Profit/Loss** | | **Other comprehensive income** | |
|---|---|---|---|---|
| | **Appreciation of foreign currency** | **Depreciation of foreign currency** | **Appreciation of foreign currency** | **Depreciation of foreign currency** |
| **Appreciation of USD against TL by 10%:** | | | | |
| 1- USD net asset/liability | (1.987.544) | 1.987.544 | – | – |
| 2- Hedged portion of USD risk (-) | 1.005.918 | (1.368.303) | 123.369 | 199.012 |
| **3- USD net effect (1+2)** | **(981.626)** | **619.241** | **123.369** | **199.012** |
| **Appreciation of EUR against TL by 10%:** | | | | |
| 4- EUR net asset/liability | (680.827) | 680.827 | – | – |
| 5- Hedged portion of EUR risk (-) | 426.541 | (618.389) | (8.280) | 323.323 |
| **6- EUR net effect (4+5)** | **(254.286)** | **62.438** | **(8.280)** | **323.323** |
| **Appreciation of other foreign currencies against TL by 10%:** | | | | |
| 7- Other foreign currency net asset/liability | (2.189) | 2.189 | – | – |
| 8- Hedged portion of other foreign currency (-) | – | – | – | – |
| **9- Other foreign currency net effect (7+8)** | **(2.189)** | **2.189** | **–** | **–** |
| **Total (3+6+9)** | **(1.238.101)** | **683.868** | **115.089** | **522.335** |

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 34. FINANCIAL RISK MANAGEMENT OBJECTIVES AND POLICIES (CONTINUED)

### *Market risk (continued)*

*Foreign currency risk (continued)*

| **31 December 2020** | **Profit/Loss** | | **Other comprehensive income** | |
|---|---|---|---|---|
| | **Appreciation of foreign currency** | **Depreciation of foreign currency** | **Appreciation of foreign currency** | **Depreciation of foreign currency** |
| **Appreciation of USD against TL by 10%:** | | | | |
| 1- USD net asset/liability | (1.220.859) | 1.220.859 | – | – |
| 2- Hedged portion of USD risk (-) | 1.081.873 | (951.038) | (323.629) | 127.333 |
| **3- USD net effect (1+2)** | **(138.986)** | **269.821** | **(323.629)** | **127.333** |
| **Appreciation of EUR against TL by 10%:** | | | | |
| 4- EUR net asset/liability | (380.345) | 380.345 | – | – |
| 5- Hedged portion of EUR risk (-) | 466.961 | (454.125) | (182.307) | 12.460 |
| **6- EUR net effect (4+5)** | **86.616** | **(73.780)** | **(182.307)** | **12.460** |
| **Appreciation of other foreign currencies against TL by 10%:** | | | | |
| 7- Other foreign currency net asset/liability | (7.108) | 7.108 | – | – |
| 8- Hedged portion of other foreign currency (-) | – | – | – | – |
| **9- Other foreign currency net effect (7+8)** | **(7.108)** | **7.108** | **–** | **–** |
| **Total (3+6+9)** | **(59.478)** | **203.149** | **(505.936)** | **139.793** |

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 34. FINANCIAL RISK MANAGEMENT OBJECTIVES AND POLICIES (CONTINUED)

***Interest rate risk***

The value of a financial instrument will fluctuate as a result of changes in market prices. The Group's interest rate risk is primarily attributable to its borrowings.

The interest-bearing financial liabilities have variable interest rates, whereas the interest bearing financial assets have a fixed interest rate and future cash flows associated with these financial instruments will not fluctuate in amount. The Group is subject to interest risk due to financial liabilities and finance lease obligations. Policy of the Group is to manage this risk through fixed and variable rates borrowings. In order to cover for these risks, the Group has entered into interest rate swaps (Note 15).

The interest rate risk table is presented below:

| | **31 December 2021** | **31 December 2020** |
|---|---|---|
| **Financial instruments with fixed interest rate** | | |
| Financial assets (*) | 6.763.055 | 4.259.967 |
| Financial liabilities | (13.898.494) | (10.118.519) |
| | **(7.135.439)** | **(5.858.552)** |
| **Financial instruments with variable interest rate** | | |
| Financial liabilities | (14.465.423) | (9.778.387) |
| Effect of hedging | 18.925.223 | 10.217.460 |
| | **4.459.800** | **439.073** |

(*) Financial assets consists of cash at banks – time deposit (Note 4).

If the base point of denominated interest rates for financial instruments with variable interest rate was higher 0,25%, with all other variables held constant, the Group's income before tax and minority interest would be lower by TL 28.462 (31 December 2020: TL 4.545) and interest rate was lower 0,25%, with all other variables held constant, the Group's income before tax and minority interest would be higher by TL 33.230 (31 December 2020: TL 4.626) as of 31 December 2021.

On the other side because of hedging, if the base point of interest rate higher/lower 0,25%, equity would have no effect (31 December 2020: TL 44.496). If the base point of interest rate lower 0,25%, equity would have no effect (31 December 2020: TL 45.058).

***Explanation on the presentation of financial assets and liabilities at their fair values***

The below table summarizes the carrying and fair values of financial asset and liabilities in the Group's consolidated financial statements.

Due to their short-term nature, the fair value of trade and other receivables represents their book value. The fair value of borrowings with fixed interests is obtained by calculating their discounted cash flows using the market interest rate effective at the reporting date. The fair value of foreign currency denominated borrowings with variable interests is obtained by discounting the projected cash flows using estimated market interest rates.

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 34. FINANCIAL RISK MANAGEMENT OBJECTIVES AND POLICIES (CONTINUED)

***Explanation on the presentation of financial assets and liabilities at their fair values (continued)***

| | Carrying amount | | Fair value | |
|---|---|---|---|---|
| | **31 December 2021** | **31 December 2020** | **31 December 2021** | **31 December 2020** |
| **Financial assets** | | | | |
| Cash and cash equivalents | 7.696.870 | 5.007.927 | 7.696.870 | 5.007.927 |
| Trade and other receivables (including related parties) | 6.862.008 | 5.682.675 | 6.862.008 | 5.682.675 |
| Financial investments (*) | 13.671 | 17.956 | (*) | (*) |
| Derivative financial assets | 4.039.063 | 1.240.177 | 4.039.063 | 1.240.177 |
| **Financial liabilities** | | | | |
| Bank borrowings | 15.103.379 | 12.360.529 | 15.106.751 | 12.360.529 |
| Issued debt instruments | 13.260.538 | 7.536.377 | 13.548.878 | 7.952.273 |
| Trade payables and other liabilities (including related parties) (**) | 9.238.270 | 6.422.255 | 9.238.270 | 6.422.255 |
| Derivative financial liabilities | 466.756 | 715.005 | 466.756 | 715.005 |

(*) Group's share in financial investments is carried at cost. Information on fair value of share in these investments are not available.

(**) Trade payables and other liabilities item includes trade and other payables, employee benefit obligations and other liabilities contained within other current liabilities. Taxes and other payables contained within employee benefit obligations and advances contained within other current liabilities are excluded.

***Fair value hierarchy table***

The group classifies the fair value measurement of each class of financial instruments according to the source, using the three-level hierarchy, as follows:

Level 1: Market price valuation techniques for the determined financial instruments traded in markets (unadjusted)

Level 2: Other valuation techniques includes direct or indirect observable inputs

Level 3: Valuation techniques does not contain observable market inputs

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 34. FINANCIAL RISK MANAGEMENT OBJECTIVES AND POLICIES (CONTINUED)

***Explanation on the presentation of financial assets and liabilities at their fair values (continued)***

Fair value hierarchy table as at 31 December 2021 is as follows:

| | | | Fair Value Measurement | | |
|---|---|---|---|---|---|
| | **Date of Valuation** | **Total** | **Quoted Prices in Active Markets (Level 1)** | **Significant Observable Inputs (Level 2)** | **Significant Unobservable Inputs (Level 3)** |
| **Financial assets measured at fair value:** | | | | | |
| Derivative Financial Assets: | | | | | |
| Interest rate swaps | 31 December 2021 | 39.980 | – | 39.980 | – |
| Cross currency swaps (*) | 31 December 2021 | 3.373.176 | – | 3.773.176 | – |
| Futures | 31 December 2021 | 224.125 | – | 224.125 | – |
| Commodity derivative (Copper) | 31 December 2021 | 1.782 | – | 1.782 | – |
| **Financial liabilities measured at fair value:** | | | | | |
| Issued debt instruments | 31 December 2021 | 6.322.835 | 6.322.835 | – | – |
| Derivative Financial Liabilities: | | | | | |
| Interest rate swaps | 31 December 2021 | 351.986 | – | 351.986 | – |
| Cross currency swaps (*) | 31 December 2021 | 23.352 | – | 23.352 | – |
| Futures | 31 December 2021 | 91.259 | – | 91.259 | – |
| Commodity derivative (Copper) | 31 December 2021 | 159 | – | 159 | – |
| **Other financial liabilities not measured at fair value** | | | | | |
| Bank loans | 31 December 2021 | 15.103.379 | – | 15.103.379 | – |
| Issued debt instruments | 31 December 2021 | 7.226.043 | 7.226.043 | – | – |

(*) Cross currency swaps consist of forwards and foreign currency swaps.

The Group specifies the fair value measurement of futures according to the forward exchange rates at the balance sheet date, whereas fair values of cross currency swaps are measured according to the net present value of the estimated future cash flows based on observable yield curves, measurement methods of fair value for derivative financial instruments and issued debt instruments are explained in Note 2.3.

Movement table of derivative financial assets and liabilities are disclosed in Note 25.

*(Currency in thousands of Turkish Lira ("TL") unless otherwise stated, all other currencies are also disclosed in thousands)*

## 34. FINANCIAL RISK MANAGEMENT OBJECTIVES AND POLICIES (CONTINUED)

***Explanation on the presentation of financial assets and liabilities at their fair values (continued)***

Fair value hierarchy table as at 31 December 2020 is as follows:

| | | | Fair Value Measurement | | |
|---|---|---|---|---|---|
| | **Date of Valuation** | **Total** | **Quoted Prices in Active Markets (Level 1)** | **Significant Observable Inputs (Level 2)** | **Significant Unobservable Inputs (Level 3)** |
| **Financial assets measured at fair value:** | | | | | |
| Derivative Financial Assets: | | | | | |
| Interest rate swaps | 31 December 2020 | 32.710 | – | 32.710 | – |
| Cross currency swaps (*) | 31 December 2020 | 1.207.467 | – | 1.207.467 | – |
| **Financial liabilities measured at fair value:** | | | | | |
| Issued debt instruments | 31 December 2020 | 3.658.788 | 3.658.788 | – | – |
| Derivative Financial Liabilities: | | | | | |
| Interest rate swaps | 31 December 2020 | 347.286 | – | 347.286 | – |
| Cross currency swaps (*) | 31 December 2020 | 289.692 | – | 289.692 | – |
| Futures | 31 December 2020 | 71.408 | | 71.408 | |
| Commodity derivative (Copper) | 31 December 2020 | 6.619 | – | 6.619 | – |
| **Other financial liabilities not measured at fair value** | | | | | |
| Bank loans | 31 December 2020 | 12.360.529 | – | 12.360.529 | – |
| Issued debt instruments | 31 December 2020 | 4.293.485 | 4.293.485 | – | – |

(*) Cross currency swaps consist of forwards and foreign currency swaps**.**

***Capital management policies***

The primary objective of the Group's capital management is to ensure that it maintains a strong credit rating and healthy capital ratios in order to support its business and maximize shareholder value.

The Group manages its capital structure and adjusts it in light of changes in economic conditions.

To maintain or adjust the capital structure, the Group may adjust the dividend payment to shareholders or return capital to shareholders. No changes were made in the objectives, policies or processes during the years 2020 and 2021.

## 35. INDEPENDENT AUDIT FEES AND OTHER FEES RELATED SERVICES RECEIVED FROM INDEPENDENT AUDIT FIRM

The fees related to the services received by the Group from the independent auditor/independent audit firm are presented below:

| | **1 January - 31 December 2021** | **1 January - 31 December 2020** |
|---|---|---|
| Audit fee for the year | 7.015 | 6.651 |
| Fees for tax advisory services | 676 | – |
| Fees for other assurance services | 15 | 87 |
| **Total** | **7.706** | **6.738** |