

There's a World

That brings good to all

odeabank

Sustainability Report 2023



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We set out on our journey with the belief that “there’s a world that brings good to all,” striving to become more equitable, inclusive, environmentally conscious, focused on impact and renewability, and guided by digital transformation—creating a future that is happier, more hopeful, and responsible. At Odeabank, we dedicate all our efforts to reaching “that world.” That’s why we consider sustainability an integral part of all our processes. Under the umbrella of financial empowerment, we channel our efforts into advancing digital transformation, enhancing customer experiences, and fostering innovation. Through responsible transformation finance, we support the shift to a low-carbon economy, carefully monitor our environmental impact, and prioritize responsible products, services, and renewable energy investments. Embracing our human-centered banking philosophy, we champion diversity, equality, and inclusion in all aspects of life. We place great importance on the well-being, safety, and health of our employees while nurturing their development through financial and digital literacy programs.

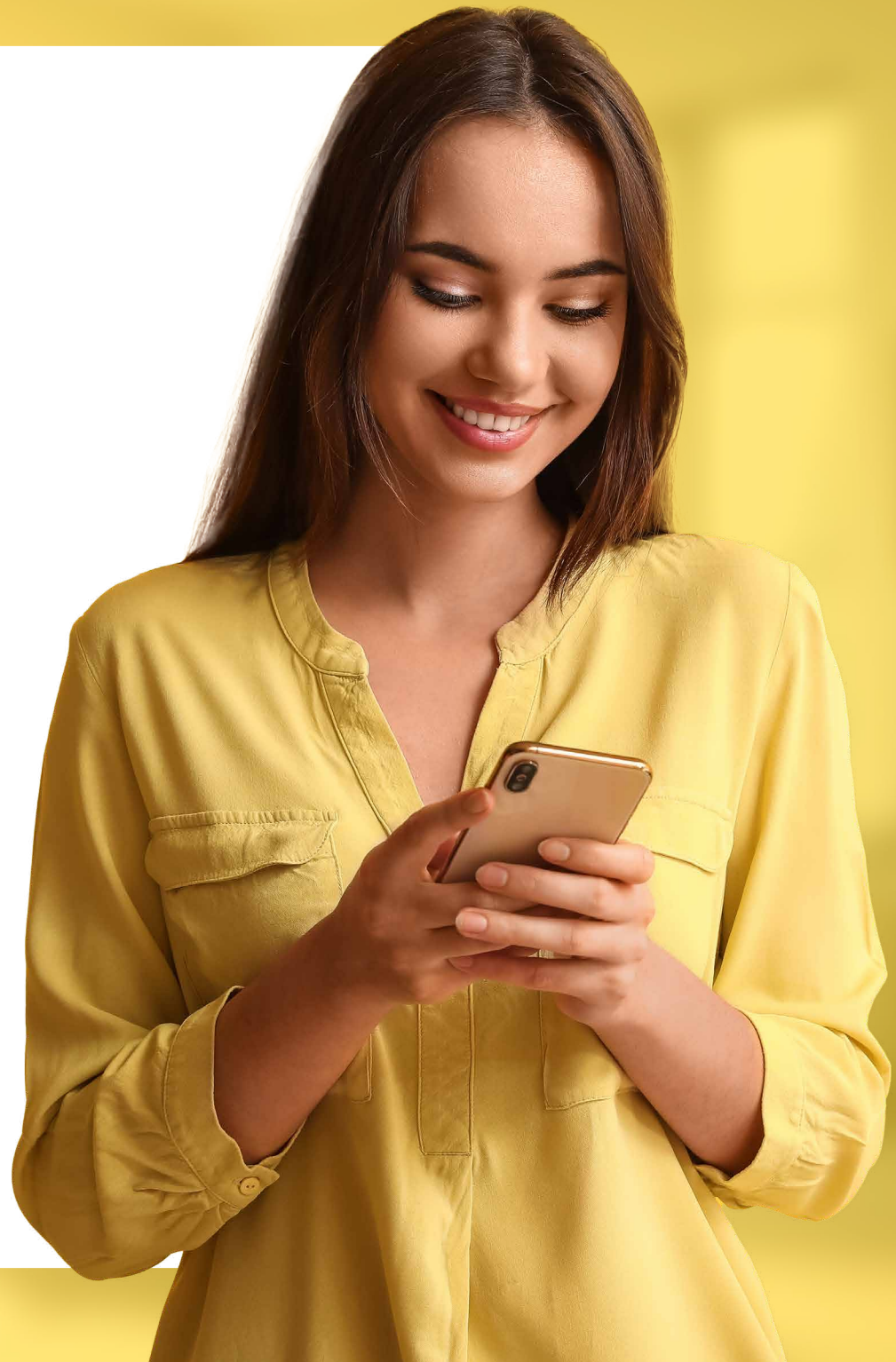
Each day, with every project, initiative, and investment we bring to life, we take another step toward the world we envision.

There's a World

Beyond what is seen

We believe that digitalization is key to enhancing our customers' access to financial resources and adapting to a changing world. To reach that trustworthy and fast-paced world, we closely monitor and embrace evolving technologies. In 2023, with the motto "You Are at the Center of Investment," we began offering our customers an investment-focused banking experience. With our vision to become the leading "phygital" bank of Türkiye, offering the best digital experience integrated with authentic physical services, we provide future-ready solutions.

Odea's Mobile Transaction Volume Growth
180%



There's a World

Where fresh air prevails

We regularly measure our environmental impact as we progress step by step toward that more livable and responsible world. To raise awareness of the climate crisis, we offer our Green Transition Loan, providing financing for investments focused on renewable energy and energy efficiency. Through our Sustainability Ambassadors, we provide our clients with advisory services on sustainable finance, the climate crisis, and responsible investments. With our Green Deposit product, we further enhance our contribution to green transformation, channeling all the funds raised into environmentally conscious projects.

Recycled electronic waste
296 kg



There's a World

Shaping the future

With our investments in artificial intelligence and digital advancements, we are enhancing the efficiency of our services. We are shaping “that world” -a world offering practical experiences and guidance that touch the future- through our new investment, Rob'O. As the first of its kind in Türkiye's banking applications, Rob'O enables our clients to access investment tools tailored to their chosen risk profiles, supporting them in growing their wealth in the investment and fund markets. Through our phygital banking approach and investments, we continue to align our customers with the future.

Average training hours per employee
30 hours

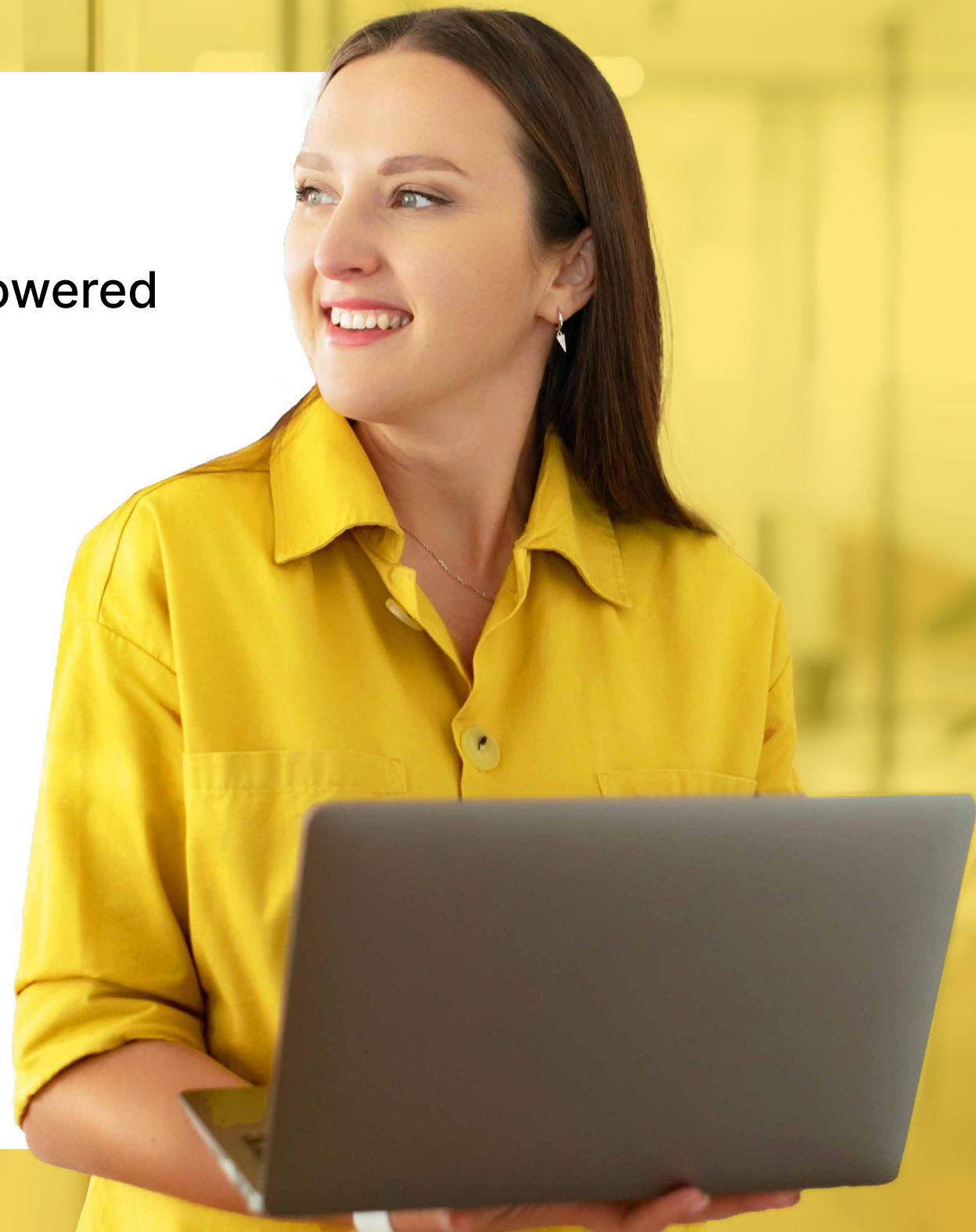


There's a World

That is more equal and empowered

We actively support women's participation in the workforce, setting a benchmark for our sector with the ratio of women in our workforce. We stand by women to ensure they have access to opportunities where they can succeed, be strong and free, and fully showcase their talents in every aspect of life. As part of our collaboration with İhracatı Geliştirme A.Ş. (Export Development Inc.-İGE), we have developed the "Women in Export Support Package," offering favorable financing conditions to export companies led by women executives.

Our women workforce ratio
58%



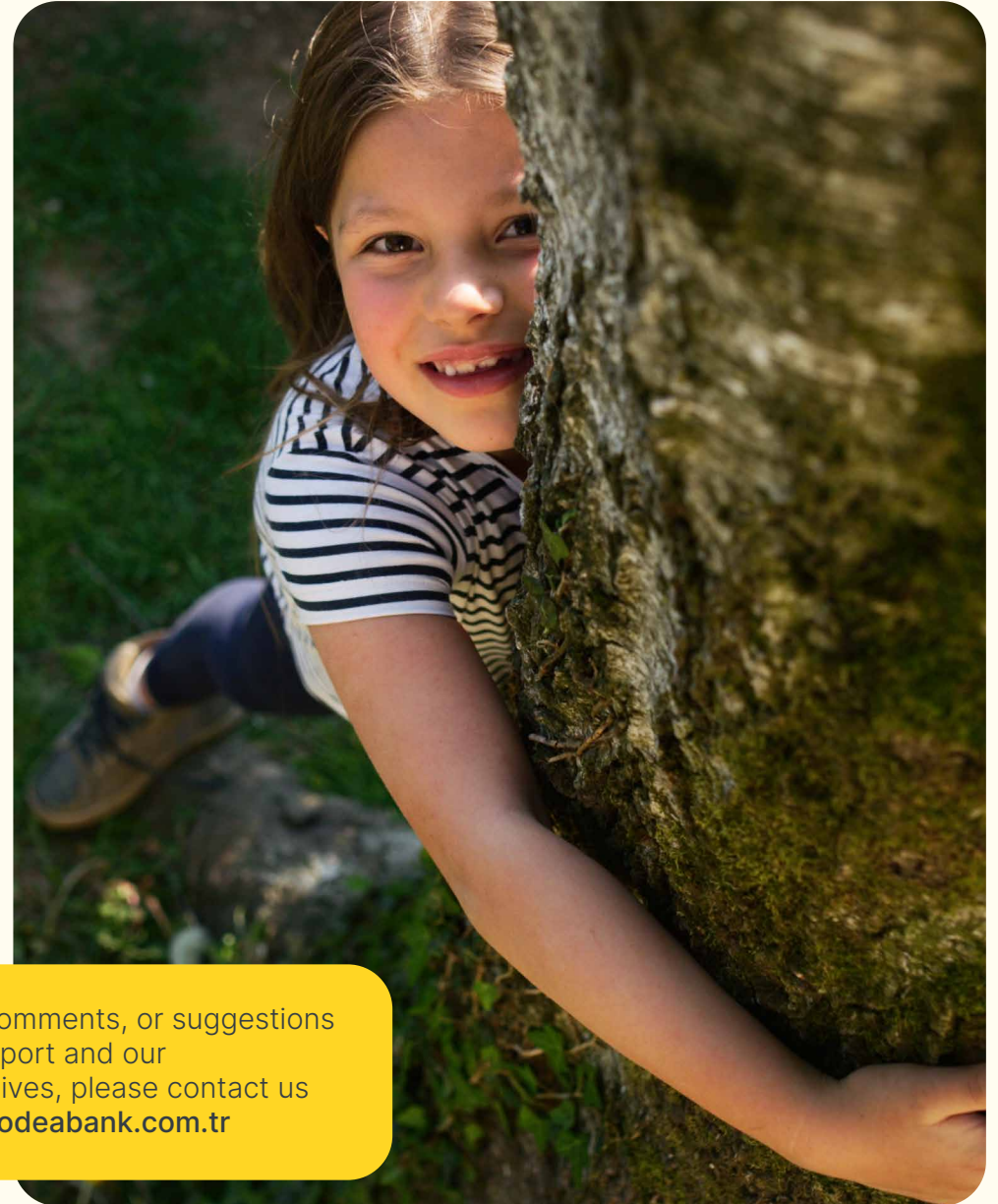
ABOUT THE REPORT

We accelerate our sustainability efforts through our dynamic and innovative structure.

At Odea Bank A.Ş. we recognize the vital role of the financial sector in promoting sustainability. In line with this awareness, we are accelerating our sustainability efforts through our dynamic and innovative approach. As a result of these efforts, we are pleased to share our third sustainability report, prepared in accordance with the GRI Standards published by the Global Reporting Initiative (GRI), to present our non-financial performance. The Odeabank Sustainability Report 2023, which includes the activities we have undertaken on our journey towards achieving our sustainability goals, covers data from the period 1 January to 31 December 2023 and highlights strategic efforts shaping the year 2024.

In line with global and sector trends, we have updated our sustainability strategy in 2023. Our new strategy, entitled **Empowering and Transformative Finance**, is aligned with the sustainability priorities we have set for 2024 and is positioned within three core value areas: **financial empowerment, human-centered banking, and responsible transformation finance**. We transparently and periodically share the approach we have adopted on our journey, the activities we conduct, and our goals with the public through our sustainability report. Additionally, we place great value on all feedback and suggestions from our stakeholders.

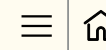
For any inquiries, comments, or suggestions in regards to the report and our sustainability initiatives, please contact us at: sustainability@odeabank.com.tr





We meticulously
select and manage
our investments and
projects to promote
financial inclusion
and sustainability.

KHALIL EL DEBS
Odeabank Chair of the Board



CHAIR'S MESSAGE

At the core of our 360-degree sustainability strategy lies our commitment to integrating environmental, social, and governance (ESG) factors into our value creation objectives across all aspects of our operations.

180%

Increase in Mobile Transactions

Esteemed Stakeholders,

In 2023, we encountered a range of significant challenges, including elevated inflation rates, geopolitical tensions, disruptions in supply chains and record-breaking temperatures. Such factors have notably impacted the banking sector, underscoring the importance of environmental, social, and governance (ESG) principles at Odeabank. We remain committed to a sustainable future with an

unwavering determination and an innovative approach to adapt to the evolving dynamics of our environment.

Recently, we have reinforced our position within the banking sector not only through solid financial performance, but also by advancing our sustainability initiatives, meeting our environmental and social responsibilities with the utmost standards. As we present our third sustainability report, I would like to emphasize that this moment represents a pivotal turning point for our organization—an inflection point in our commitment to environmentally responsible growth and long term financial sustainability.

By integrating our customer-centric approach with our commitment to sustainability, we aspire to take a leading role in delivering sustainable financial solutions for the future. In alignment with our medium-term objective of becoming Türkiye's premier "phygital" (physical and digital) bank, we continue to provide innovative and responsible banking services that create value for our customers, employees, and society at large. Throughout this period, we have maintained our environmental and social responsibilities at the highest standards, proactively addressing climate change and social inequalities. We have adopted a banking model that systematically evaluates and manages environmental and social risks. Such a model reinforces our vision of responsible banking by aligning with our policy of refraining from financing activities that are prohibited by the International Finance Corporation (IFC). As consistently demonstrated, we meticulously select and manage our investments and projects to promote financial inclusion and sustainability.

We are investing to reduce our carbon footprint by integrating environmental factors into our business processes. Through the implementation of the 'Energy Management Platform,' we monitor energy consumption across our branches, execute sustainability improvement activities and achieve significant energy savings. As we prioritize digital transformation through initiatives such as Odeatech, we are increasing our investments in the development of artificial intelligence and emerging digital trends. Our newly upgraded Odea App is designed to provide customers with an exceptional digital experience while promoting access to environmentally focused investment information.

In our efforts to reduce our carbon footprint and accelerate digital transformation, we have successfully implemented various initiatives that foster a sustainable future for our employees and society. These initiatives reflect Odeabank's vision of distinguishing itself in the sector not only through financial performance but also through a meaningful social and environmental impact. Our "Fair Tales" project is dedicated to promoting gender equality in all aspects of life. Through this initiative, we actively engage children with theater productions that highlight themes of sustainability and environmental awareness.

At the core of our 360-degree sustainability strategy lies our commitment to integrating environmental, social, and governance (ESG) factors into all aspects of our operations while aligning them with our value creation objectives. In this context, our sustainability-driven initiatives actively contribute to the United Nations Sustainable Development Goals and foster sustainable development.

I am pleased to present our third sustainability report, which highlights our recent advancements in environmental initiatives and outlines our goals for a sustainable future. I would like to extend my sincere gratitude to all our stakeholders for their unwavering trust and support.

Sincerely,

KHALIL EL DEBS
Odeabank Chair of the Board



As we pursue our vision of becoming Türkiye's foremost “phygital” bank, we remain committed to contributing to the national economy.

Dr. Mert Öncü
CEO and Board Member



CEO'S MESSAGE

We operate with the vision of being a bank that provides clients with future-ready financial solutions and guides them along the way.

58%
Our Women
Workforce Ratio

5,058 tons
Prevented CO₂
Emissions

Esteemed Stakeholders,

The year 2023 was marked by exceptional solidarity across our nation. In the aftermath of the devastating earthquakes in Kahramanmaraş and Hatay, we united as a country, focusing our efforts on recovery and healing. Odeabank, through its collaboration with the Turkish Federation of Women's Associations, extended its support to the Mor Yerleşke centers in İskenderun and Malatya, aimed at addressing the needs of women, children, and vulnerable groups affected by this tragedy. While these challenges have undeniably strengthened our resilience, the centennial anniversary of our Republic has further motivated us to work harder and contribute more to society.

Our world is undergoing a profound transformation period. Rapid technological advancements, efforts to combat climate change, and initiatives aimed at reducing social inequalities are all redefining the role of the financial sector. In emerging economies such as Türkiye, the digitalization of financial services is accelerating, while the shift towards a low-carbon economy and the inclusion of diverse societal groups into the economic framework have gained strategic importance.

The Paris Agreement stands as a historic milestone in the fight against climate change, and its impact on the financial sector is becoming increasingly profound with each passing day. To achieve the goal of limiting global warming to 1.5°C, directing substantial capital into the impactful areas has become inevitable. The need for climate finance is expected to continuously increase, reaching between USD 8.1 trillion and USD 9 trillion by 2030, and exceeding USD 10 trillion annually during the 2031-2050 period. Another critical pillar of this transformation is the European Union's Green Deal. The EU's green and digital transformation, referred to as the twin transition, is crucial for enhancing the competitiveness of economies and supporting sustainable development. This includes regulations that reshape both environmental and commercial practices, such as the Carbon Border Adjustment Mechanism (CBAM) and the Corporate Sustainability Due Diligence

Directive (CSDDD), requiring all sectors to restructure their activities around sustainability principles. The green transformation of SMEs was especially a key focus during the panels organized as part of COP28. It was highlighted that achieving net-zero targets would be unattainable without the participation of SMEs; however, it is crucial to support their access to finance, technology, and capacity development along the way.

Similar developments are gaining momentum in our country as well. In line with Türkiye's net-zero emissions target for 2053, an ecosystem is being established to foster the growth of sustainable finance. Regulations such as the Sustainable Finance Framework Document, the Banking Regulation and Supervision Agency's (BRSA) Sustainable Banking Strategic Plan, the Draft Communiqué on the Green Asset Ratio, and the Draft Guide on Effective Management of Climate-Related Financial Risks by Banks outline the roadmap for promoting sustainable finance practices across the banking sector.

Taking into account these global and local dynamics, our sustainability strategy, **Empowering and Transformative Finance**, is built around our vision of becoming a bank that supports green, technological, and digital transformation, providing clients with future-proof financial solutions and guiding them along the way.



CEO'S MESSAGE

Through Odeatech, our technology company, we are strengthening our Bank's R&D efforts in the fields of information technology, communication, and artificial intelligence technologies.

Driven by our **Financial Empowerment** approach, we are working to keep pace with the constantly evolving digital world. To this end, we launched our new investment-focused mobile app. We proudly introduced our enhanced Odea app and our intelligent investment advisor, Rob'O, both designed to deliver an investment-focused banking experience to our clients. Under our motto, "You Are at the Center of Investment," we created investment-focused content and launched our podcast series to enhance financial literacy. To date, we have released 14

episodes with the invitees who are experts in their fields. Through Odeatech, our technology company established to accelerate digital transformation, we are advancing our R&D efforts in information, communication, and artificial intelligence technologies. Our aim is to develop AI-driven software, methodologies, and standards, delivering innovative products, tools, and analytical solutions. In 2023, we also launched Odea Radio, amplifying our investment-focused content and reaching a broader audience.

Our **Responsible Transformation Finance** efforts go beyond supporting the shift to a low-carbon economy, also aiming to deliver social impact. Our green and social loan products reflect our steadfast commitment to these values. Through our self-funded Green Transformation Package, offered in strategic partnership with İhracatı Geliştirme A.Ş. (İGE), we provide tailored financing opportunities to exporting companies focused on improving energy efficiency. Furthermore, our Supporting Women in Export Package offers favorable financing to women-led exporting companies, diversifying our products and services in responsible transformation. Since 2016, we have monitored and optimized our branches' energy consumption through our Energy Management Platform, resulting in 9.7 MWh of energy savings and prevention of 5,058 tons of CO₂ emissions.

With our **Human-Centered Banking** approach and commitment to providing equal opportunities for everyone, we are proud to have a workforce made up of 58% women, which is above the sector average. We ranked 50th on Capital Magazine's "100 Women Executive Friendly Companies" list as part of their Women-Friendly Companies Survey. Placing diversity and inclusion at the heart of our corporate culture, we continued to develop various training programs for our employees in 2023. Our Fair Tales theater initiative, aimed at raising awareness about gender equality

and environmental sustainability, reached thousands of spectators across different provinces again this year. Over its course, the project has engaged over 31,000 children through 38 performances, promoting environmental awareness and commitment to nature. In 2023, we distributed one million Fair Tales books across more than 1,200 schools as part of our initiative to emphasize gender equality in all aspects of life. We once again took part in the Istanbul Foundation for Culture and Arts (İKSV) Istanbul Theater Festival with the theme of "There Is a Woman Behind This!" and sponsored the Pergamon Theater Festival. Furthermore, through our art platform O'art, we continued to support artists, particularly those working in the field of digital art.

As we pursue our vision of becoming Türkiye's foremost "phygital" bank, we remain committed to contributing to the local economy. I would like to extend my sincere gratitude to all my colleagues who consistently demonstrate dedication and professionalism by embracing our vision and mission, to our valued partners for their unwavering support, and most importantly, to our loyal customers, whose trust empowers us at every step of our journey.

Sincerely,

Dr. Mert Öncü
CEO and Board Member



ABOUT ODEABANK

Odeabank is dedicated to a customer-centric approach, thriving to create value for its customers, shareholders, and the broader community.

Established in 2012, Odeabank operates as the Turkish subsidiary of Bank Audi Group, Lebanon's leading financial institution. Operating with 41 branches and a total of 1,284 employees across Türkiye, Odeabank is committed to providing customized financial solutions that cater to the unique needs of individual and corporate customers. Over the past 12 years, Odeabank has continuously enhanced its value and solidified its market position, supported by a strong capital structure and highly skilled team, further contributing to the local economy.

Integrating its sustainability principles into its corporate strategy, the Bank adopts a value-creation approach that extends beyond financial performance. Our strategic decisions are designed to

promote long-term sustainable economic growth, with a focus on minimizing environmental impact and generating societal benefits. This approach enables Odeabank to offer innovative, competitive products to its customers while embedding sustainability at the core of our business model, amplifying its positive impact. This strategy has positioned Odeabank as one of the most innovative and competitive banks in Türkiye, expanding its customer base and continuously enhancing its digital banking channels to swiftly and seamlessly meet customer needs.

Reviewing our 2023 financial results, our net loans reached TL 34.5 billion, while deposits totaled TL 58.2 billion, resulting in a gross loan-to-deposit ratio of 64%. This strong performance allowed



As of end-2023:

41 Branches

1,284 Employees

**TL 84 Billion
Total Assets**

Odeabank to maintain a solid, self-funding balance sheet, with total assets amounting to TL 83.7 billion by year-end. In 2023, Odeabank successfully increased its gross loan volume to TL 37.4 billion and achieved a net profit of TL 1,710 million, representing a 100% growth and continuing its contribution to Türkiye's economy.

As part of our forward-looking business strategy, Odeabank is focused on serving export-oriented and high value-added sectors through a diverse product portfolio. Backed by strong liquidity and a solid capital structure, the Bank confidently approaches the future. As

Türkiye's young, dynamic, and innovative bank, Odeabank remains dedicated to enhancing its business model in an effort to provide great value for all stakeholders, driven by its belief in the country's future and its vast potential.

HIGHLIGHTS OF 2023

We have reached a total energy savings of 9.7 MWh.



Female Employee Ratio: 58%

We actively support gender diversity in the workplace, with women representing 58% of our employee ratio, a figure that significantly surpasses the sector's standards.



Odeabank Rob'O Product

In August 2023, we launched the Rob'O product, the first of its kind in Türkiye's banking applications.



Öğreniy'O Webinar Series

As part of the Öğreniy'O Webinar Series, we held a total of 8 webinars in 2023, covering a variety of topics.



Eşit Masallar (Fair Tales) Project

Continuing our Fair Tales project in 2023, we distributed 1 million Fair Tales books to over 1,200 schools.



Energy Savings

Since 2016, we have reached a total energy savings of 9.7 MWh through our Energy Management Platform. As in 2022, we continued to source I-REC certified energy in 2023.



Odeabank App

In 2023, we launched our Odea app, offering investment-oriented banking to our customers.



Young Talent Program

In August 2023, as part of the Young Talent Program, we enabled 51 young talents to participate in a one-month development program consisting of training and workshops in core banking, technical, professional, and personal growth areas.



Odea Radio

Odea Radio went on air as Türkiye's first and only 24/7 digital bank radio station, aiming to reach listeners seeking to turn their savings into investments and contribute to economic growth by fostering financial empowerment.



HISTORY

Since its founding in 2012, Odeabank has evolved through various significant milestones.

2012

- In October 2012, Odeabank opened its first branch in Maslak with the permit obtained from the Banking Regulation and Supervision Agency (BRSA).

2013

- The first SME loan program was successfully implemented with the financing support of the International Finance Corporation (IFC).

2014

- The Bank's first energy-themed loan program, focusing on energy efficiency and renewable energy, was launched in collaboration with "Proparco."
- Odeabank launched its Oxygen Account product.

2015

- O'art, Odeabank's art platform was established.
- The Bank's first Green Building Financing Program has been commenced in cooperation with IFC.
- Odeabank's Headquarters has moved to Levent 199, an environmentally friendly building with LEED Gold certification.

2016

- A capital increase of TL 1 billion was successfully executed in the Bank.
- The Sustainable Energy Management Platform was commissioned.
- EBRD and IFC, two of the most prominent international finance institutions have joined our Bank as shareholders.
- The Bank's E&S evaluation processes have been upgraded in line with World Bank guidelines.

2017

- The Integrated Finance and Risk Systems (IFRM) project successfully completed its implementation and testing phases and entered the pilot phase.

2018

- Odeabank ranked among the top 10 banks in terms of asset size.

2019

- The re-launch campaign was mounted with the motto of "More Than It Seems."

2020

- Odeabank become a signatory to the United Nations Women's Empowerment Principles, a private sector initiative striving to enable women's full participation in economic life on equal terms.
- The Eşit Masallar (Fair Tales) social responsibility project was launched.
- Odeabank introduced Yakından Bankacılık, a service that allows customers to access all financial services through phone calls with dedicated financial advisors.
- Odeabank was listed among Türkiye's Most Valuable and Powerful Brands in the ranking by Brand Finance.

2021

- The Fair Tales project was turned into a theater play.

2022

- Odeabank published its first Sustainability Report in collaboration with the Green for Growth Fund (GGF) Technical Assistance Facility.
- The Sustainability Policy and Corporate Social Responsibility Policy have been published, and the Human Rights Policy has been formed.

2023

- A project to enhance the sustainability strategy was initiated.
- Odeabank participated as a sponsor in the 9th Sustainable Finance Forum, organized in collaboration with SKD Türkiye (The Business and Sustainable Development Council) and UN Global Compact Türkiye.
- With the launch of its new mobile app "Odea," Odeabank brought the slogan "You Are at the Center of Investment" to life.
- The revamped mobile app received multiple design awards.

- Achieved recognition in Talent Acquisition by transitioning our onboarding and orientation processes to a digital platform as a reflection of embracing digitalization across all our operations.
- Odeabank received awards in the categories of Women-Friendly Company and Talent Management/ Leadership Development, thanks to its commitment to human-centered banking.
- The launch of the "Odi" chatbot streamlined processes, enabling quicker access to information and enhancing the responsiveness of the Bank's Contact Center representatives.
- In collaboration with the Federation of Women Associations of Türkiye, the Bank donated two settlements in Iskenderun and Malatya to support earthquake-affected areas.
- The Bank took on the theme sponsorship of "There Is a Woman Behind This!" for the third time at the Istanbul Theater Festival, organized by the İKSV (Istanbul Foundation for Culture and Arts).
- Odea Radio, Türkiye's first and only 24/7 digital bank radio, was launched.
- A memorial forest was created with the donation of 10 thousand saplings to TEMA (The Turkish Foundation for Combating Soil Erosion, Reforestation, and the Protection of Natural Habitats) on behalf of individual customers acquired through digital channels.
- Sign language and audio descriptions were added to individual loan agreements to make them more inclusive for people with disabilities.
- In partnership with Piksel, three initiatives—Masterclass Program, New Media Residency Program, and O'art Talks—were launched to support young artists in new media. The "Soft Discipline" exhibition was held with the participation of program graduates.



CAPITAL AND SHAREHOLDING STRUCTURE

Our Bank, a subsidiary of a leading Lebanese banking group with a universal banking profile, Bank Audi, offers a comprehensive range of products and services, primarily covering commercial and corporate banking, retail banking, and private banking.

Odeabank's shareholding structure and shareholders can be summarized as follows:

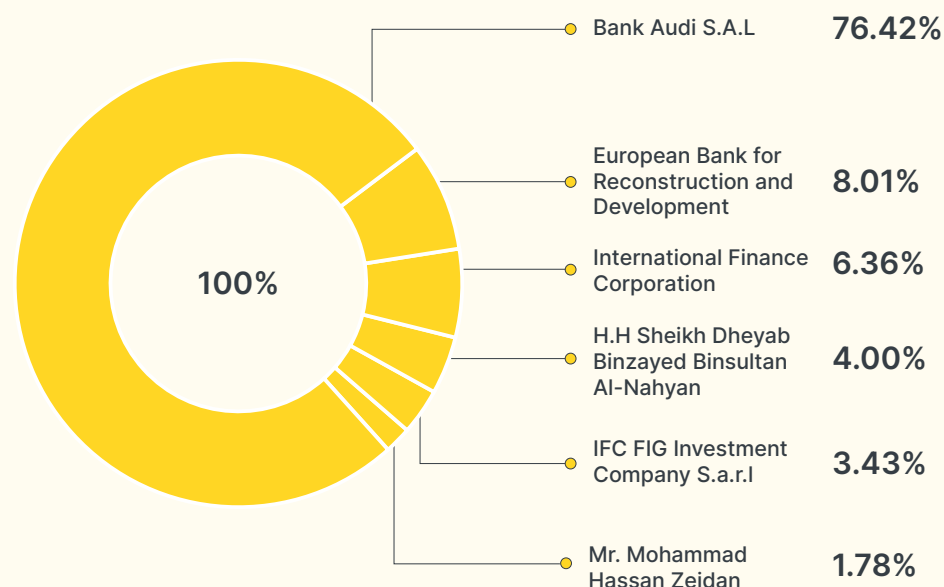
Shareholders*	Number of Shares	Share Value (TL)	Share Ownership Ratio
Bank Audi SAL	2,513,293,000.00	2,513,293,000	76.42%
European Bank for Reconstruction and Development	263,394,000.00	263,394,000	8.01%
International Finance Corporation	209,251,900.00	209,251,900	6.36%
H.H Sheikh Dheyab Binzayed Binsultan Al-Nahyan	131,697,000.00	131,697,000	4.00%
IFC FIG Investment Company S.a.r.l	112,674,100.00	112,674,100	3.43%
Mohammad Hassan Zeidan	58,532,000.00	58,532,000	1.78%
Total	3,288,842,000.00	3,288,842,000	100.00%

In 2023, Odeabank's total loan portfolio grew by TL 5 billion compared to the previous year. TL-denominated loans increased from TL 18 billion at the end of 2022 to TL 21.8 billion by the end of 2023. Foreign currency-denominated loans also rose, from TL 14.6 billion to TL 15.6 billion, driven by exchange rate effects. Meanwhile, the Bank's securities portfolio reached TL 24.2 billion in 2023. As a result, the bank's total assets grew by TL 14.7 billion, reaching TL 83.7 billion by year-end 2023.

With a variety of investment fund options offered to clients, the bank's fund volume increased to TL 27.5 billion in 2023, resulting in significant market share gains. Parallel to the growing customer base, the volume of demand deposits also expanded, and the share of demand deposits within total customer deposits reached 29.2%. Thus, we successfully concluded 2023 with strong financial results.

The total loan portfolio expanded by TL 5 billion compared to the previous year.

The Bank's securities portfolio reached TL 24.2 billion in 2023.



* The Members of the Board of Directors and senior executives are not shareholders of the Bank.

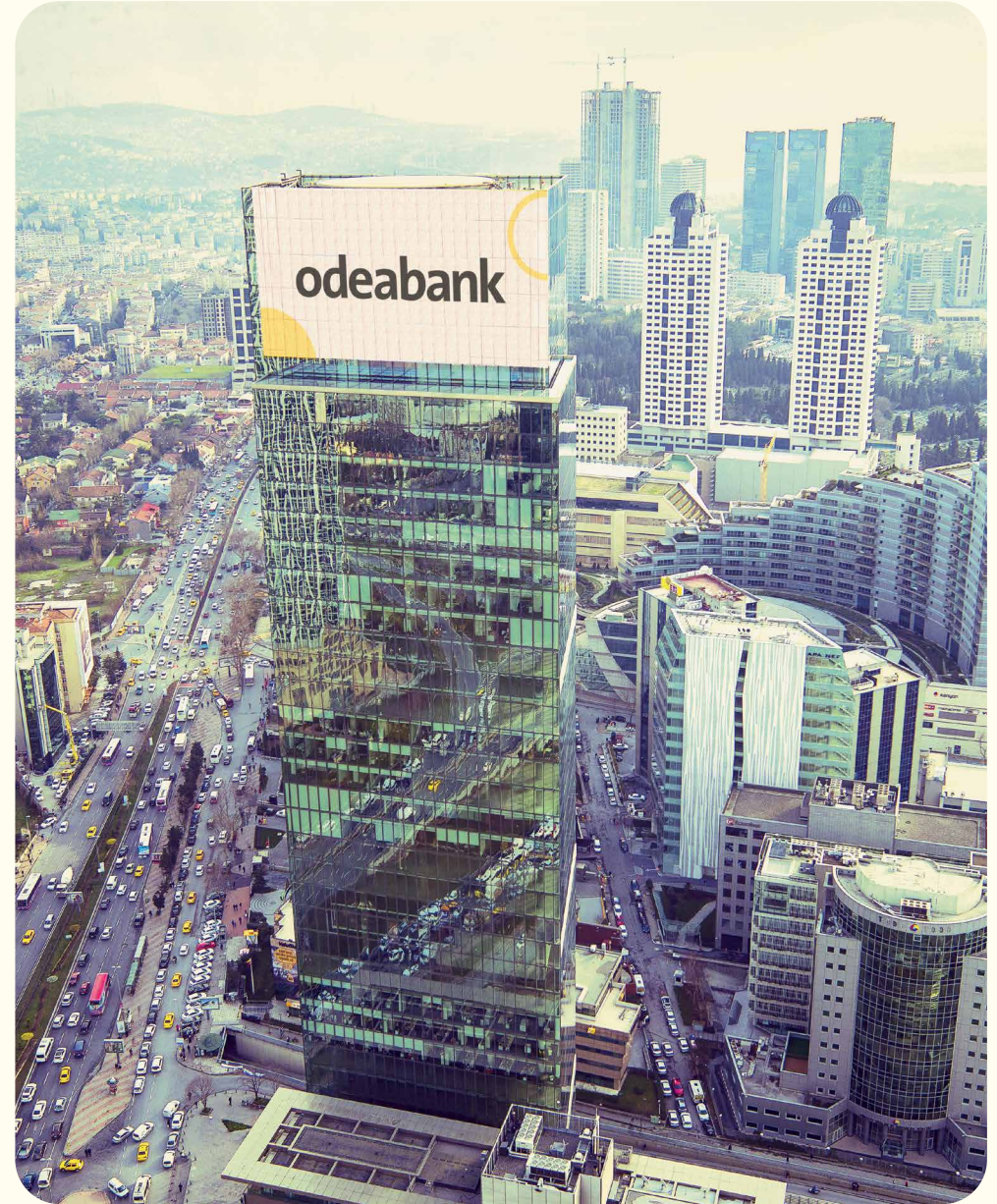
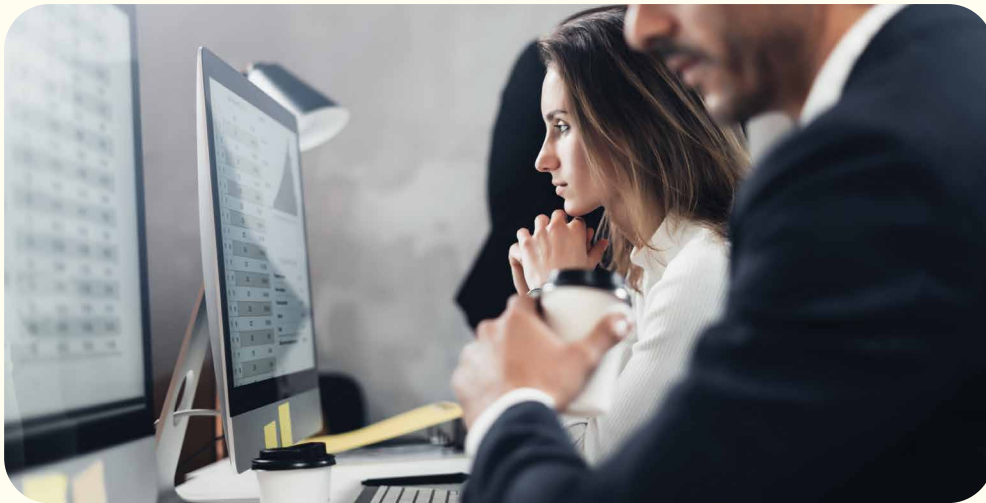


OPERATING REGIONS

We strive to deliver the best service at every customer touchpoint.

41 Branches Across 15 Cities

Odeabank operates with 41 branches in 15 different provinces in Türkiye, including Adana, Ankara, Antalya, Bursa, Denizli, Eskişehir, Gaziantep, Hatay, İstanbul, İzmir, Kayseri, Kocaeli, Konya, Mersin and Muğla, as well as Bank'O Branch in İstanbul, serving as a branchless banking hub.





VISION, MISSION, VALUES

Our Vision

To become the leading “phygital” bank of Türkiye, offering the best digital experience integrated with authentic physical services

Our Mission

To facilitate banking through authentic products and expertise, and be a responsible member of our community who contributes genuinely to its sustainable development

Our Values

Authenticity

We understand our stakeholders, and make their lives easier. We think creatively, offer quick and practical solutions. We distinguish with our influence.

Excitement

We wonder, we discover, we believe in continuous learning. We make bold decisions to develop and improve. We design and achieve together.

Openness

We build honest and reliable relationships with the principle of accountability. We care about being simple and accessible. We share our thoughts and experiences openly.

Respect

We respect the individual, we value diversity and polyphony. We support gender equality, we volunteer for an equal world.

Our Strategic Goals

For Our Customers

To become a bank that can identify its customers’ needs accurately and increase their quality of life to make them feel special and become their indispensable business partner.

For Our Employees

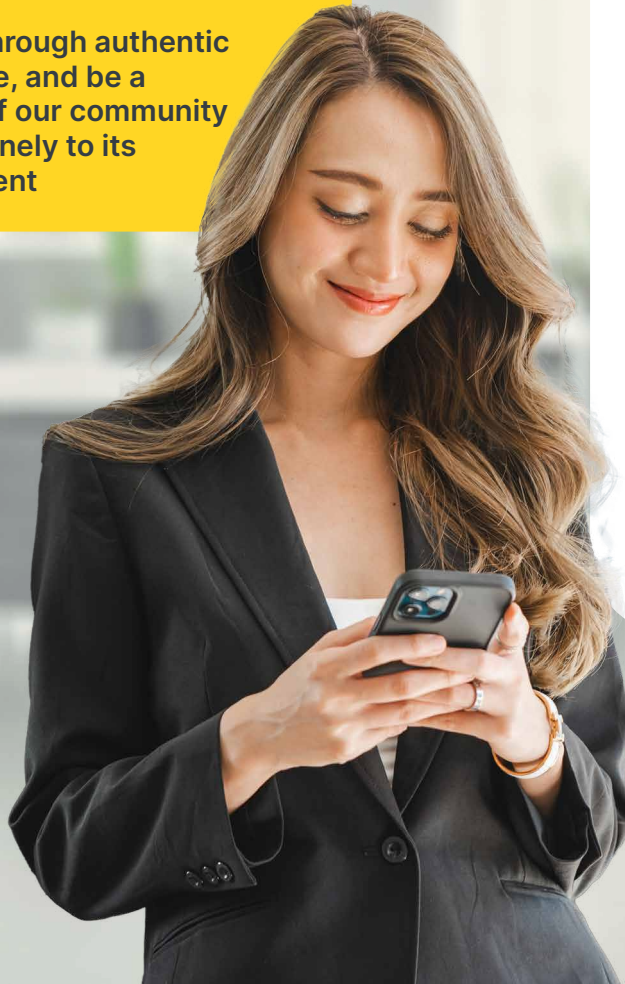
To become a bank where each and every employee will be proud to be a part of, treated fairly, and are given the opportunity to improve themselves and achieve their career goals.

For Our Society

To become a bank that is sensitive towards the needs of the community in which it operates, aware of the duties of being a corporate citizen, and determined to improve the prosperity of the society.

For Our Sector

To become a dynamic and innovative bank in the sector with its technological infrastructure, efficient service approach and experienced human resources.



PRODUCTS AND SERVICES

Commercial Banking offers value-added services to our customers at 18 locations across 13 provinces, consisting of 5 Commercial Centers and 13 Commercial Branches.

At Odeabank, we embrace a customer-oriented approach, providing a wide range of products and services tailored to meet the specific needs of individuals and commercial institutions. We place great emphasis on developing long-term, sustainable, and reliable relationships with our customers.

Commercial Banking

At Odeabank, we aim to create pioneering and rapid solutions and adopt a customer-oriented approach while developing financing solutions for Commercial Banking. Focusing on maximizing existing customer satisfaction, we strive to build a strong customer base in the long-term, aligned with our new customer acquisition targets. In line with these objectives and efforts, we maintained steady growth in loan volume in 2023. We provide

value-added services to our customers through expert human resources at 18 locations, consisting of 5 Commercial Centers and 13 Commercial Branches across 13 provinces. Our Commercial Banking services primarily include cash loans, foreign trade financing, letters of guarantee, and cash management solutions.

For more details on the structure and operations of Commercial Banking, please see pages 32-35 of the **Odeabank 2023 Annual Report**.

We place great value on developing lasting, sustainable, and reliable relationships with our customers.





PRODUCTS AND SERVICES

We expanded our total active customer base by approximately 1.5 times in 2023.

Retail Banking

At Odeabank, we operate in Retail Banking across our branches throughout Türkiye with our experienced team. We continue to develop service processes and structures to deliver the best deposit and investment products at every point of contact with our customers. Our main goal is to provide products and services tailored to the needs of our customers and to build long-lasting relationships based on trust. In line with this goal, we expanded our total active customer base by approximately 1.5 times in 2023.

In accordance with its customer-focused approach, Retail Banking expanded its product portfolio with the aim of providing added value to customers' investments and maintained its strong position in this area throughout 2023. The products and services offered, designed to meet the expectations of customers in different risk groups, resulted in positive outcomes reflected in the general customer satisfaction index.



In line with our goal of meeting the expectations of customers in different risk groups, we offer specialized products and services.

Aligned with the goal of responding to the changing needs of customers, Retail Banking serves under the Affluent Banking segment for customers with assets above a certain size. The Bank aims to offer boutique services through this segment, meeting both financial and non-financial expectations. A wide range of products and services help customers feel privileged, including personalized relationship management services, diverse investment product alternatives, free EFT and money transfers through digital channels, free withdrawals from all domestic ATMs, discounted safe deposit boxes, and the "Ayrıcalıklı" (Affluent) Card, designed specifically for this segment. Additionally, the Bank combines its expertise in investment and deposit products with superior service under the Odeabank Private Banking umbrella.

Retail Banking has continued to offer "phygital banking experience" to its customers over the past four years by combining experienced financial advisory services with Digital Banking under the umbrella of remote portfolio management.

For more detailed information on Retail Banking products and services, please see pages 36-43 of **the Odeabank 2023 Annual Report**.

STRATEGIC APPROACH

We updated our sustainability strategy in line with global and sector trends.

In 2023, we initiated comprehensive efforts to develop our sustainability strategy. During this process, we identified sustainability priorities aligned with the Bank's vision and mission. First, we reviewed the stakeholder materiality analyses conducted in previous years and performed a gap analysis based on the Bank's strategic goals. These analyses enabled us to define the core components of our sustainability strategy.

Additionally, we conducted a sector analysis by examining best practices of both local and international banks. These analyses shaped our sustainability targets and pinpointed the steps needed to effectively manage our environmental and social impacts. Ultimately, we

identified key focus areas, assigned responsible teams, and set specific targets and monitoring schedules. In 2024, we updated our priorities using the double materiality principle and, building on previous efforts, redefined the key focus areas of our strategy. This strategic approach enables us to take stronger steps in our sustainability journey, emphasizing long-term initiatives like green finance projects.

Based on our double materiality analysis and sector assessments, we identified the key steps to effectively manage our environmental and social impacts.



EMPOWERING AND TRANSFORMATIVE FINANCE

We work to strengthen our customers’ financial accessibility and enhance their ability to adapt to ever-changing global conditions.



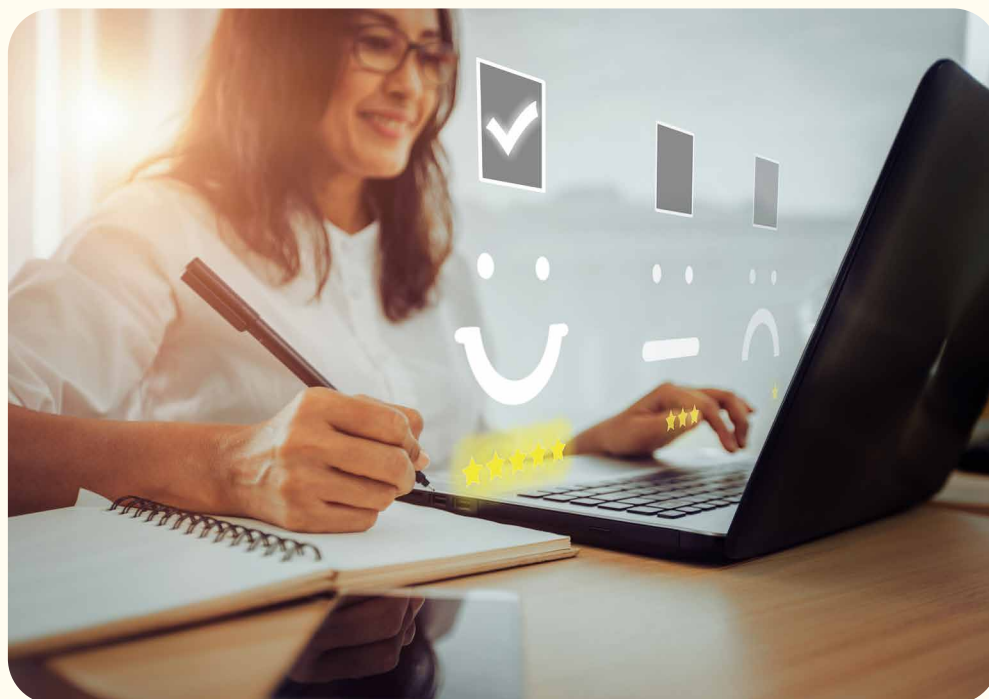
The world is undergoing profound change driven by rapidly advancing technology, digital transformation, the climate crisis, and increasing natural disasters, impacting social structures along the way. As Odeabank, we respond to these global shifts with our **Empowering and Transformative Finance** strategy. We pursue a vision of becoming a bank that supports green, technological, and digital transformation, delivering future-proof financial solutions to our customers.

Strategic Area	Financial Empowerment	Responsible Transformation Finance	Human-Centered Banking
Impact Area	We focus on high value-added initiatives that will accelerate the development of our country through our innovative and dynamic banking approach. We work to strengthen our customers’ financial accessibility and enhance their ability to adapt to ever-changing global conditions, making them financially stronger and future-ready.	We support the transition to a low-carbon economy and stand by our customers to accelerate their responsible transformation journeys. Through our responsible products and services, we facilitate the transformation of the business world.	We prioritize empowering our workforce, along with all stakeholders and society. Our goal is to create social value through projects that benefit disadvantaged and vulnerable groups.
Foundations	We build all our operations on strong foundations, ensuring that our banking activities progress on solid ground, securing financial stability and safeguarding our future.		
	Cybersecurity and Data Protection	Business Ethics and Compliance	Risk Management



EMPOWERING AND TRANSFORMATIVE FINANCE

We accelerate SMEs' and commercial enterprises' access to finance through digital banking solutions and fintech innovations.

**Financial Empowerment**

In a rapidly changing and uncertain economic environment, financial empowerment and resilience have become more critical than ever for both individuals and businesses. Banks play a pivotal role in ensuring economic security by making financial services more accessible and equitable. With our "phygital" banking vision, we offer innovative solutions to SMEs, commercial enterprises, and individuals, empowering them financially. We support business models that contribute to economic growth. Our innovative services help SMEs thrive, ensuring that they remain future-proof in a dynamic world. Through digital banking solutions and fintech innovations, we accelerate access to finance for SMEs and commercial enterprises. We are also investing in artificial intelligence and digital initiatives, delivering products and services that strengthen economic development. By offering differentiated banking solutions in both retail and commercial banking, we continuously improve the customer experience across all touchpoints.

Responsible Transformation Finance

The impacts of the global climate crisis are driving profound changes in financing processes. Companies and financial institutions must adopt financing models that not only focus on profitability but also consider environmental and social impacts. At Odeabank, we provide

financial solutions to exporters and SMEs that reduce the environmental impact of their activities, accelerating the transition to a low-carbon economy. We are also increasing investments in renewable energy projects. In sectors with high greenhouse gas emissions, we prioritize collaboration with our clients in their decarbonization journey. We are committed to enabling responsible transformation through our products and services that focus on social and environmental responsibility. With solutions that support responsible transformation, we guide our clients in adopting sustainable practices.

Human-Centered Banking

In today's rapidly changing world, evolving societal expectations are pushing banks to go beyond financial transactions. Financial institutions now play a key role in shaping a more just and inclusive society. At the core of our banking operations is a human-centered approach. We prioritize the health and well-being of our employees, focusing on effective talent management with the vision of growing and developing as a united team. We are dedicated to fostering a culture that promotes equal opportunities and inclusive growth. Our social investment programs focus on empowering women, promoting gender equality, enhancing financial and digital literacy, supporting access to arts, education, and contributing to sports activities.



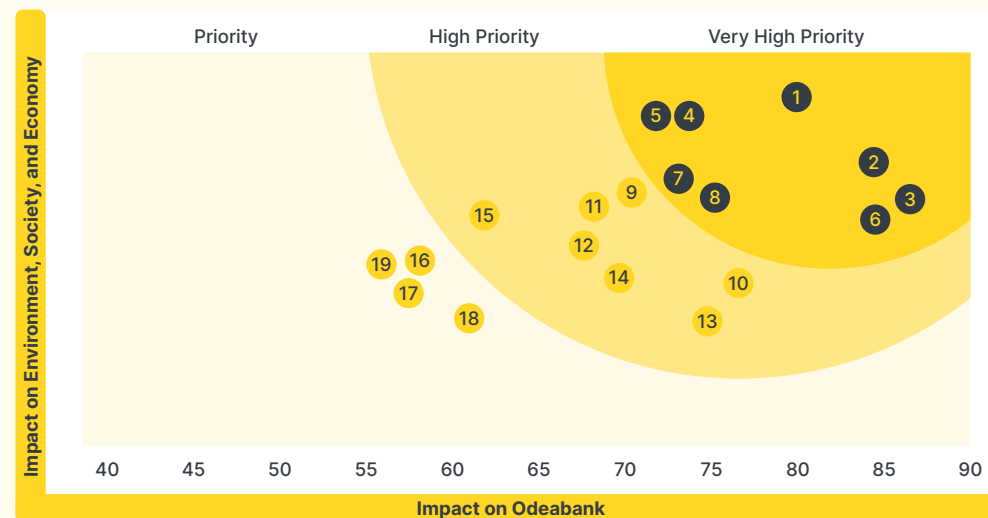
MATERIALITY ANALYSIS

In 2024, we identified our key focus areas using a double materiality approach, reassessing our impact on stakeholders while analyzing how these material issues affect our business. Stakeholder analysis, along with the insights of external stakeholders, played a critical role in this prioritization process, which is one of the fundamental stages of a materiality assessment. As we evaluated our impact on society, the environment, and the economy, we also gathered input from external stakeholders such as public institutions, civil society organizations, financial institutions, universities, customers, and suppliers. The materiality analysis was conducted by an independent consulting firm and involved diverse stakeholder groups, including employees, suppliers, customers, public institutions, universities, and civil society organizations. The process provided valuable insights into sector-related issues, our company's impact on these matters, and our priorities and performance. Additionally, we incorporated external trend analysis, financial impact assessment, and executive insights into the analysis.

While updating our materiality assessment using the double materiality approach, we followed the steps below:

- We compiled a long list of topics through extensive literature reviews, covering key issues in our sector.

- We conducted stakeholder analysis and external trend analysis. Various stakeholder groups were asked to prioritize topics from the long list via online surveys.
- The external trend analysis evaluated global and local sector reports as well as the criteria of sustainability indices.
- In the impact analysis, each topic was assessed based on the scale, scope, and likelihood of its positive and negative impacts on society and the environment.
- Executive insights and financial impact analysis played a key role in identifying our priorities. During the four-stage impact analysis, each topic was evaluated in terms of financial impact and risks, regulatory implications, innovation opportunities, and competitive advantage within the sector. A total of 17 executives, including Board Members and Senior Management, provided their insights through online surveys. In addition, a workshop with Senior Management provided further strategic insights.
- When determining our priority topics, we identified areas of common priority by considering impact analysis, external trends, stakeholder views, financial impacts, and executive opinions.



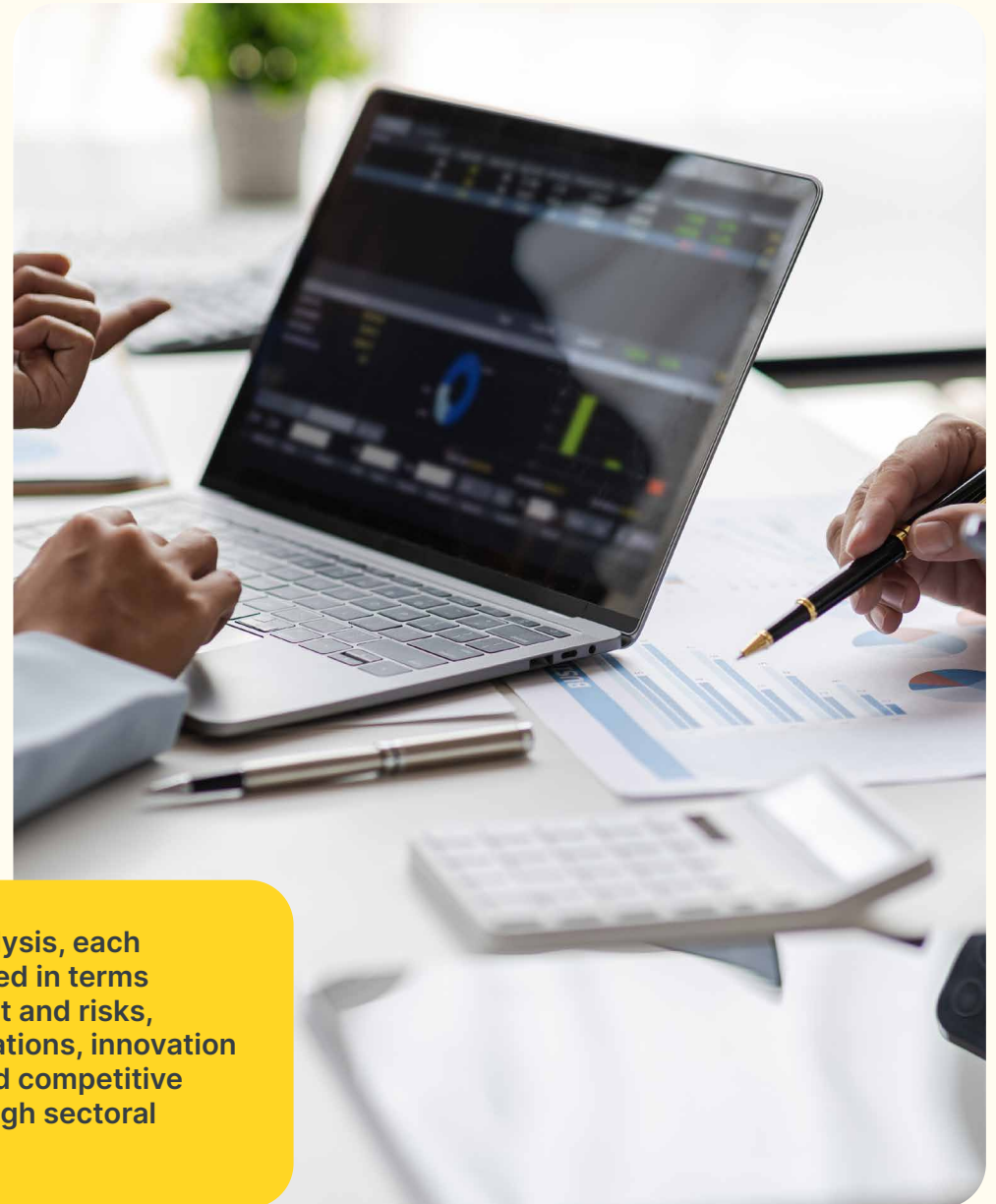
Very High Priority Topics		High Priority Topics	Priority Topics
1.	Financing the low-carbon economy	9. Environmental impact	16. Financial inclusion
2.	Cybersecurity and data protection	10. Fintech and innovation	17. Circular economy
3.	Digital transformation	11. Renewable energy	18. Prevention of financial crimes
4.	Diversity, equity, and inclusion	12. Business ethics, compliance, and anti-corruption	19. Social investment programs
5.	Talent management	13. Risk management	
6.	Customer experience	14. Corporate governance	
7.	Employee health, well-being, and safety	15. Financial and digital literacy	
8.	Responsible products and services		

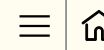
MATERIALITY ANALYSIS

Our material issues lay the foundation for our sustainability strategy. The insights gained from our analysis to establish strategic priorities form the backbone of our strategy. We strengthened the strategy development process by thoroughly examining these key areas, constructing each strategic pillar based on the analysis results.

- Financing the low-carbon economy emerged as the highest-priority topic in the analysis. Renewable energy and environmental impact, together with responsible products and services, shaped our responsible transformation finance area.
- Cybersecurity and data protection are positioned among the very high-priority topics as essential elements of the strategy, reinforcing a security-driven approach across all our operational processes. Along with business ethics, compliance and anti-corruption, and risk management, these topics serve as fundamental pillars of our strategy.
- Digital transformation and fintech innovations are at the core of our financial empowerment strategy. These high-priority topics make banking services accessible to a broader audience, fostering financial empowerment and enhancing economic participation. Additionally, this focus elevates the customer experience and further strengthens our digitalization journey.
- Human-centered banking has been reinforced by key priorities including diversity, equity, inclusion, talent management, and the health, well-being, and safety of employees. This focus deepens our human-centric approach, while subjects such as financial literacy further bolster this strategic pillar.

In the impact analysis, each topic was assessed in terms of financial impact and risks, regulatory implications, innovation opportunities, and competitive advantages through sectoral benchmarks.





SUSTAINABILITY MANAGEMENT

We support our sustainability practices not only through our products and services but also through our corporate structure and governance approach. The Sustainability Management Committee provides secure communication channels for reporting any actions and transactions that do not align with our corporate values and ethical standards. It establishes systems to allow for the reporting of potential deviations, monitors compliance with the Bank's Corporate Governance Principles, and conducts improvement efforts while presenting recommendations to the Board of Directors. The Committee convenes at least three times a year, with additional meetings held as necessary. It reviews the Bank's Corporate Governance framework annually and provides a report to the Board in this regard. In the first half of 2023, our Sustainability Committee, led by our General Manager, convened to set annual sustainability-related goals and actions aligned with selected priority topics. Following a restructuring in August 2023, the Corporate Governance and Sustainability Committee held one meeting in November.

The purpose of the Corporate Governance and Sustainability Committee is to support the Board of Directors in ensuring compliance with the Bank's Corporate Governance principles and monitoring sustainability activities, while also conducting improvement efforts and providing recommendations to the Board. The Committee discusses strategic priorities related to environmental, social, and governance issues and regularly reviews the development and efficiency of sustainability activities. According to relevant regulations, the Committee Chair must be a Board Member without executive duties. The Committee is responsible for monitoring the Bank's sustainability activities and approving our Sustainability Report.

The organizational structure of the Corporate Governance and Sustainability Committee* is as follows:

Committee Chair	Chahdan Jebeyli	Board Member
Committee Member	Mouayed Makhoulouf	Board Member
Committee Member	Dr. Ayşe Botan Berker	Board Member

** As of August 2023, the authorities and responsibilities of Odeabank's Corporate Governance Committee have been expanded to include oversight of the Bank's sustainability activities, and in this context, the Committee's name has been updated to "Corporate Governance and Sustainability Committee."*

The responsibilities monitored by the Sustainability Department include, but are not limited to, the following:

- Establishing a sustainability strategy by defining a roadmap in line with the Bank's vision and mission.
- Keeping track of both national and international sustainability developments and developing sustainable financial products.
- Monitoring the creation of a sustainable business model through the Bank's operations and/or suppliers.
- Fulfilling and transparently communicating sustainability-related commitments.
- Advancing efforts to achieve a sustainable structure.
- Implementing sustainability-related products and services in collaboration with the working group.
- Following up on the actions assigned to the working group.
- Periodically presenting sustainability-related efforts and internal developments to the Corporate Governance and Sustainability Committee and providing updates.

In 2022, Odeabank established the Bank's Sustainability Department to execute its sustainability approach and coordinate the implementation of its sustainability operations. Initially part of the General Secretariat Unit, the Sustainability Department, which is committed to creating shareable and sustainable value for all stakeholders in the short and long term, was governed under the Legal Department for one year starting from September 2022. In October 2023, the department expanded its operations by integrating into the Financial Institutions and Funding function and continues to address its work with a 360-degree strategy.

While advancing with the vision of being a bank that supports green, technological, and digital transformation by providing future-ready financing solutions to our customers, special sustainability training was conducted for senior management to closely monitor evolving regulations and enhance their integration into our business strategies.

A distinct working group operates within the Bank under the leadership of the Sustainability Department. This working group comprises representatives from various departments of the Bank, including the Financial Institutions and Funding, Corporate Communications and Marketing, Human Resources, Retail Banking, Risk Management, Commercial Banking, Internal Services, Internal Control, Internal Audit, Digital Transformation, Regulations and Compliance.



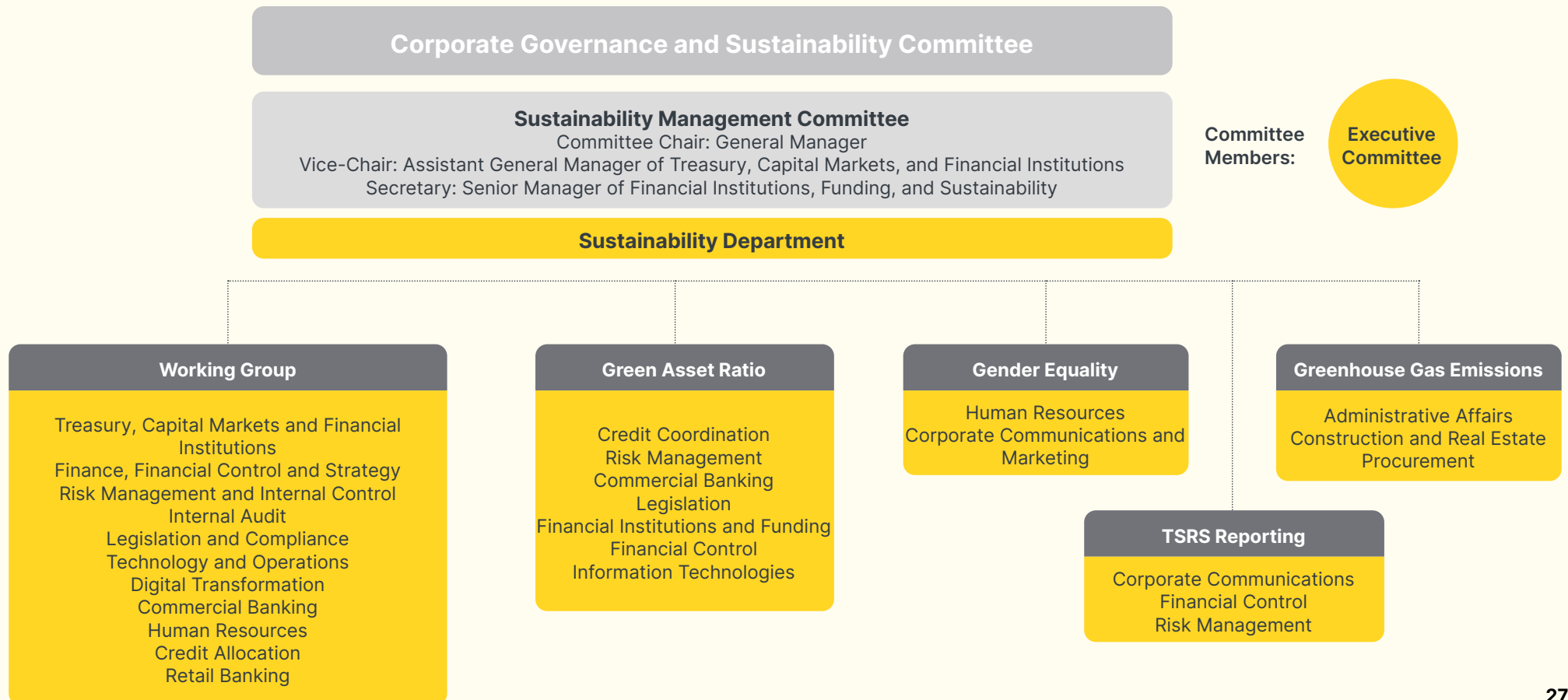
SUSTAINABILITY MANAGEMENT

In line with our priority areas and evolving regulations, we have sub-working groups under the Sustainability Department focused on Green Asset Ratio, Gender Equality, Greenhouse Gas Emissions, and Türkiye Sustainability Reporting

Standards (TSRS) Reporting. These sub-working groups meet as necessary to develop strategic initiatives and take action.

Beyond its internal business processes, Odeabank maintains an organizational structure that actively monitors environmental and social issues and implements risk management measures in its lending activities. Within this

framework, the Credit Coordination function, positioned under the Corporate, Commercial, and SME Credit Allocation Unit affiliated with the Credit Allocation Department, provides assistance to the Bank's sustainability governance.



CORPORATE GOVERNANCE

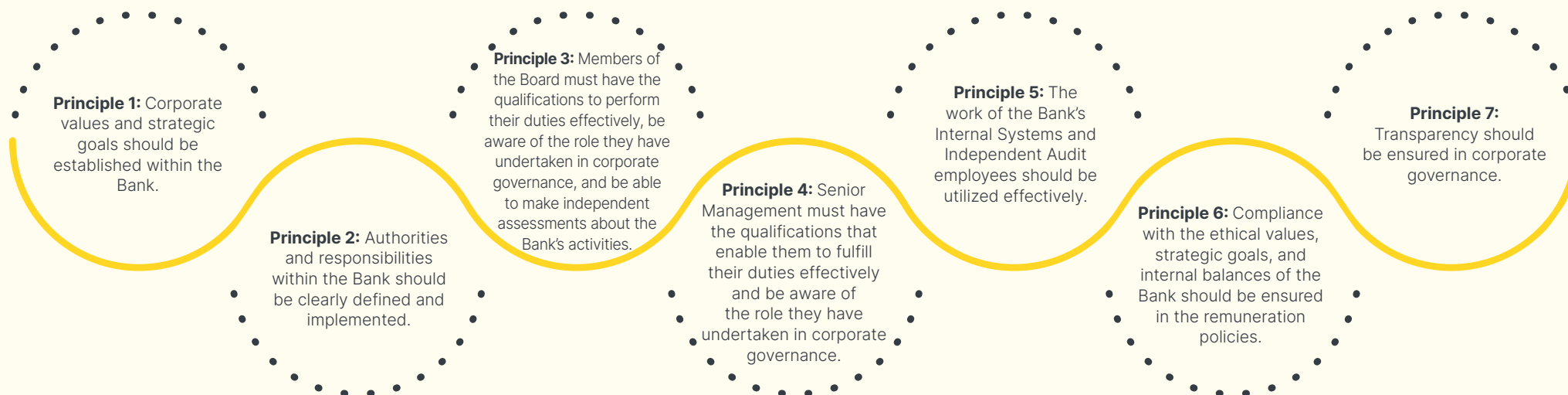
At Odeabank, we aim to create long-term value through our corporate governance structure and practices. In this regard, we have been publishing an annual “Corporate Governance Principles Compliance Report” since 2017 to ensure the adoption and continuous improvement of our Corporate Governance Principles within the Bank.

We expect all stakeholders to fully comply with the rules established within the framework of corporate governance principles, and we conduct our activities based on the principle of equality.

You can access our Corporate Governance Principles Compliance Reports [here](#).

Corporate Governance Policy

In compliance with the BRSA regulation, Odeabank has established its distinctive corporate governance principles and codified them in its Corporate Governance Policy. These principles are as follows:





CORPORATE GOVERNANCE

At Odeabank, we recognize that having a robust corporate governance structure creates positive value for all stakeholders. In this regard, we promote the continuity and consistency of compliance with our principles through the relevant policy. We regularly review our governance structure, objectives, and responsibilities outlined in our Corporate Governance Policy and make necessary updates. While safeguarding the interests of all our stakeholders through our corporate governance framework, we manage conflicts of interest fairly.

Supporting Policies	Our Efforts
Sustainability Policy	Odeabank prioritizes sustainable development with a responsible banking approach, aiming to minimize the negative environmental and social impacts that may arise from both its customers and its own business processes. The Bank also follows international best practices in line with the United Nations' Sustainable Development Goals. Through its Sustainability Policy, the Bank defines the general principles it embraces to support sustainable development, as well as its core management and control objectives.
Environmental and Social Policy and List of Prohibited Activities	Odeabank's Environmental and Social Policy delineates the fundamental principles guiding the identification, monitoring, and management of environmental and social impacts that may arise from lending processes. The Bank adheres to national legislative regulations and international standards regarding environmental and social issues. The Bank refrains from providing financing for any activities that are prohibited or restricted. You can access the Bank's Environmental and Social Policy and List of Prohibited Activities here.
Corporate Social Responsibility Policy	Driven by a strong corporate social responsibility awareness, Odeabank engages in awareness-raising and transformative initiatives across diverse areas including education, environmental protection, women's empowerment, sports, culture, arts, gender equality, and accessibility.

Human Resources Policy	Odeabank's Human Resources Policy is rooted in the belief that its most valuable asset is its human capital. Through this policy, Odeabank strives to promote a professional, fair, and effective approach across all activities, encouraging employees to uphold ethical values and comply with local laws, regulations, and the Bank's internal rules. You can access detailed information about Odeabank's Human Resources Policy here.
Human Rights Policy	Odeabank prioritizes providing a respectful, equitable, and safe working environment that upholds human rights for all stakeholders. The Bank is committed to employee health and safety while fostering diversity and inclusion. The Human Rights Policy has been included within the Human Resources Policy.
Remuneration and Fringe Benefits Policy	Odeabank's Remuneration Policy outlines the key principles governing a fair and transparent reward strategy implemented within the organization. The remuneration strategy, aligned with sector practices, adopts an egalitarian approach that emphasizes incentivizing high performance and recognizing achievements. Employee rewards and fringe benefits are closely tied to individual performance and take into account the risks involved in the Bank's operations. You can access detailed information about Odeabank's Remuneration and Fringe Benefits Policy here.
AML/CFT Policy	Odeabank has an effective strategy to ensure full compliance with legal obligations and national and international legislation regarding the prevention of money laundering and financing of terrorism, employing a risk-based approach to minimize these risks. All employees of the Bank are obligated to fully adhere to this policy.
Personal Data Protection and Processing Policy	Odeabank places the highest priority on processing, safeguarding, and maintaining the confidentiality and security of all personal data of real persons related to its products and services in strict accordance with the Law on the Protection of Personal Data. The Personal Data Protection and Processing Policy outlines the measures taken to ensure that data is processed and protected in compliance with the law. You can access the Personal Data Protection and Processing Policy here.
Domestic and International Sanctions Policy	Odeabank and its main shareholder Bank Audi Group have adopted the principle of implementing the necessary policies, procedures, and controls to ensure that prohibited or questionable individuals, institutions, or services/products are not involved in transactions within the scope of embargo practices applied at national and international levels. They aim to protect the Bank and customer assets while ensuring the healthy functioning of the financial system. Their objectives include preventing reputational risks and financial losses, evaluating products and services based on risk, and enhancing internal controls, rules, responsibilities, and employee awareness.



CODE OF ETHICS

Reflecting our dedication to fair competition and anti-corruption, we conduct regular awareness training for our employees.

The Code of Ethics encompasses a set of ethical principles that outline the professional and personal responsibilities all Odeabank employees are expected to embrace. Rooted in our core values and “Banking Ethical Values,” these rules aim to serve as a guide for our employees. We are committed to promoting ethical conduct and ensuring strict adherence to all business rules, laws, and regulations within the banking sector, while also increasing awareness of ethical issues among our employees.

In this context, all Odeabank employees are responsible for:

- acting in accordance with the principle of confidentiality of customer and Bank information,
- keeping fair and accurate records,
- performing transactions honestly,
- being consistent in their relationships with others,
- providing complete, accurate, and full information,

- refraining from discriminating based on religion, language, race, gender, age, sexual orientation, marital status, and physical appearance,
- providing a work environment that is free of violence, physical and psychological abuse, alcohol, and drugs.

Odeabank employees have specific responsibilities regarding data privacy and information security. We are committed to safeguarding personal data of both legal and natural persons obtained through our banking activities, which includes sensitive information related to the Bank’s strategy, business plans, technologies, employee salaries, and third-party data. The responsibility of our employees in terms of data privacy and information security extends beyond their period of employment with the Bank and continues even after they leave.

Within the framework of Odeabank’s Code of Ethics, the disclosure of the following information is prohibited to ensure information security:

- Internal and/or confidential information,
- Financial or organizational information about the Bank, including information regarding the Bank’s operations, strategies, business plans, processes, proprietary products, technologies, etc.,
- Information about customers and their accounts to protect customer confidentiality,
- Third-party information provided to the Bank through its suppliers and commercial counterparts,
- Salary, personal or professional background information of employees,
- All private information of Bank customers or representatives.

The Code of Ethics outlines expectations not only for ethical principles but also for preventing conflicts of interest. In this regard, we expect employees in decision-making positions to refrain from acting contrary to the Bank’s interests, avoid unfair competition, and not engage in illegal activities.

In line with the Bank’s commitment to fair competition and the fight against the proceeds of crime, we conduct awareness-raising training for our employees. The training topics include risks related to fraud and corruption.

We expect all our employees to fully comply with the Ethical Principles. There is a Whistleblowing Reporting Line available for all employees to report any ethical violations. The process for reporting a violation, including the steps to be taken and the channels, authorized units, or individuals for direct communication, has been communicated within the Bank. In 2023, one notification was made through the ethical line and was resolved.

The Internal Audit Department oversees the violation reporting process, ensuring complete confidentiality for the reporting employees and preventing any potential negative consequences they may face. If ethical violations are not reported, the Bank reserves the right to initiate disciplinary actions under the Disciplinary Committee Procedure, and the matter will be assessed by the Bank’s Disciplinary Committee.

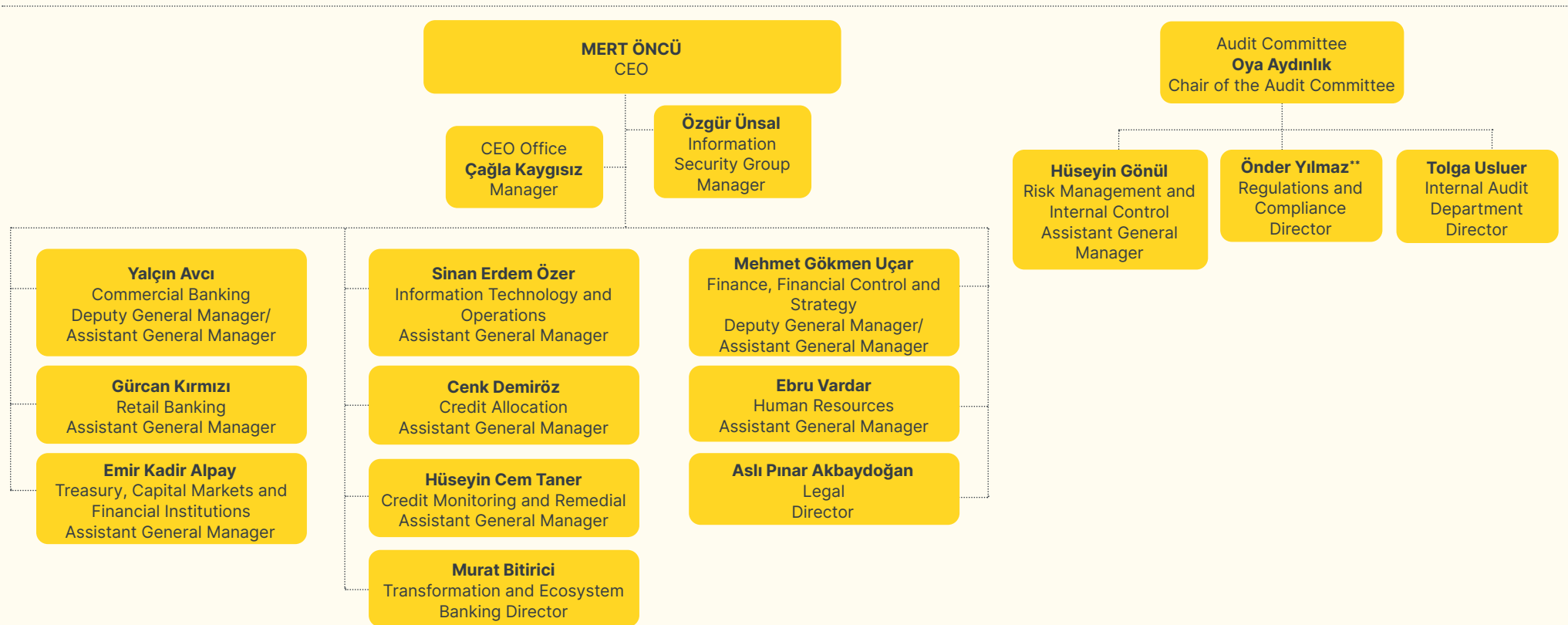




ORGANIZATIONAL STRUCTURE, SENIOR MANAGEMENT AND AUDITORS

The organizational structure of Odeabank includes members of the Executive Committee, which operates under the General Manager, Dr. Mert Öncü, as well as the Internal Systems functions that operate under the Audit Committee.

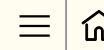
Odeabank Organizational Chart*



*Following Murat Bitirici's departure from the Bank, Digital Banking activities have been incorporated under Retail Banking, now under the responsibility of Gürcan Kırmızı.

**Following Önder Yılmaz's departure from the Bank in 2024, Tolga Usluer continues his role as the Assistant General Manager responsible for the Regulations and Compliance Department as well as the activities of the Internal Audit Department.

For detailed information about the Organizational Structure, Executive Management, and auditors, please see pages 98-109 of the **Odeabank 2023 Annual Report**.



ORGANIZATIONAL STRUCTURE, SENIOR MANAGEMENT AND AUDITORS

Committees

Odeabank has five committees that report to the Board of Directors. These committees are the Credit Committee, Audit Committee, Corporate Governance and Sustainability Committee, Remuneration Committee, and Risk Committee. The bylaws, authorities, responsibilities, and reporting requirements for all committees are outlined in the Corporate Governance Policy.

For detailed information about the committees, please see pages 110-114 of the **Odeabank 2023 Annual Report**.

In addition to these five committees, there are Management Committees that report to the CEO in various areas.

The Management Committees operating within Odeabank are as follows:

- Executive Committee (EXCO)
- Assets-Liabilities Committee (ALCO)
- Operational Risk Committee
- Disciplinary Committee
- Information Security Committee
- Information Systems Steering and Strategy Committee
- Information Systems (IS) Continuity Committee
- IFRS 9 Provisioning Committee
- Expense Management Committee
- Remedial and Management Committee
- Information Sharing Committee

Internal Systems, Regulations and Compliance

As per the Regulation on Internal Systems and Internal Capital Adequacy Assessment Process of Banks, the responsibility for overseeing internal systems can be delegated solely to non-executive members of the Board of Directors or the Audit Committee, and at Odeabank, this responsibility has been entrusted to the Audit Committee. The Internal Control and Fraud Prevention Unit, along with the Risk Management Units under Internal Systems, reports directly to the Audit Committee through the Assistant General Manager of Risk Management and Internal Control; the Internal Audit Department reports to the Audit Committee through the Head of Internal Audit, while the Legislation and Compliance Unit reports to the Audit Committee through the Head of Legislation and Compliance. The function referred to as "Internal Audit" in the relevant regulations and legislation is conducted by the "Internal Audit Department" within the Bank.

Units and activities related to Internal Systems are as follows:

- **Internal Audit Department:** The Internal Audit Department operates under the Audit Committee and reports directly to the Board of Directors to ensure the independence and objectivity requirements. This department assumes the assurance function.

- **Internal Control and Fraud Prevention:**

The Internal Control and Fraud Prevention Unit is responsible for monitoring, independently evaluating, and reporting on the adequacy of information systems controls, financial, operational, and other controls to ensure that banking activities comply with established policies, procedures, and applicable regulations. It also carries out fraud prevention activities and reports the results effectively and periodically to Senior Management.

- **Regulation and Protection of Personal Data Unit, and Combatting Financial Crimes and Compliance:**

The Legislation Unit is responsible for tracking legislative changes, ensuring their dissemination within the Bank, establishing connections between the Bank and regulatory authorities on legislative matters, answering inquiries from Bank personnel regarding legislation, managing compliance with the Personal Data Protection Law, and enhancing awareness of legislation within the Bank.

- **Combating Financial Crimes and Compliance:** Odeabank has developed an effective strategy to ensure compliance with legal obligations and national and international legislation related to preventing money laundering, financing of terrorism, and proliferation of weapons of mass destruction. This strategy not only ensures compliance with legal requirements but also emphasizes the proper and honest execution of contracts while managing compliance risks effectively.

We have established an Operational Risk Committee to promote and strengthen a culture of internal systems in accordance with the directives and guidelines of the Board of Directors, particularly following the Banking Law No. 5411 and the Regulation on Internal Systems and Internal Capital Adequacy Assessment Process of Banks. This committee aims to enhance the harmony between internal systems functions and business lines while providing final opinions from Senior Management when discrepancies arise.

For detailed information on Internal Systems, Legislation and Compliance with the Law on the Protection of Personal Data, and Combating Financial Crimes, please see pages 124-127 of the **Odeabank 2023 Annual Report**.



RISK MANAGEMENT

In line with our Bank's strategy, we identify and analyze the risks and opportunities that will support our short, medium, and long-term objectives, and we implement our activities accordingly. Our policy, established to ensure effective risk management within the Bank, outlines the duties, scope, principles, risk management framework, risk management process, roles, and responsibilities of the risk function.

We approach the risk identification process, one of the most critical steps in our Bank's risk assessment process, with great care. At Odeabank, we view taking actions in response to a risk, along with measures to reduce either the likelihood or impact of the risk, as one of the fundamental pillars of our risk management approach. Relevant actions and recommendations are prepared in collaboration with stakeholders, evaluated by the Risk Committee, and then submitted to the Board of Directors.

Risk management at our Bank is evaluated and monitored through three distinct units: the Credit Risk Unit, the Market and Asset-Liability Risk Unit, and the Operational Risk and Business Continuity Unit.

- **Credit Risk Unit:** This unit is responsible for quantifying risks, developing risk strategies, conducting credit risk reporting, monitoring limits set by the Board of Directors, and performing provision calculations in accordance with BRSA and IFRS 9 requirements. It also calculates capital adequacy to ensure compliance.
- **Market and Asset-Liability Risk Unit:** This unit actively manages market risk arising from the trading positions, counterparty credit risk related to derivatives, balance sheet risks, as well as interest rate and liquidity risks. It plays a key role in the development and implementation of policies related to these risks. The relevant risks are measured, reported, and managed in compliance with national regulations and the Bank's internal risk policies.
- **Operational Risk and Business Continuity Unit:** This unit is responsible for tracking, recording, and reporting operational risk events within the Bank, in alignment with Basel II and local regulations. It ensures that operational risk policies and procedures are updated and develops preventive and corrective actions for risk and loss events. As part of business continuity efforts, it ensures that critical business processes and technical infrastructure are sufficient and ready to prevent operational disruptions in case of a disaster.

For detailed information on risk management and the activities of these units, please see pages 127-129 of the **Odeabank 2023 Annual Report**.

The significant risks Odeabank is exposed to under the Internal Capital Adequacy Assessment Process (ICAAP) framework are outlined below:

CREDIT RISK

MARKET RISK

OPERATIONAL RISK

CONCENTRATION RISK

STRUCTURAL INTEREST RATE RISK

LIQUIDITY RISK

Odeabank's Board of Directors adheres to the following fundamental risk management principles:

- The risk function serves to assist business lines and decision-makers in making the right decisions.

- The Bank's risk management responsibilities are structured around three lines of defense: Lines of Business and Senior Management (first line of defense); Risk, Compliance, and Internal Control (second line of defense); and Internal Audit Department and Independent Audit (third line of defense).
- The risk function does not have the authority to veto commercial decisions. In the event of a negative assessment of a decision, the Risk Committee reports it to the Board of Directors for further review.
- Risks are communicated to internal and external stakeholders in a transparent, systematic, structured, accurate, and timely manner.
- A Board-approved risk appetite sets the limits that management can operate within across the Bank. The Risk Management Department ensures that the risk appetite remains within the defined limits and submits the necessary reports to Senior Management and the Board of Directors.

Aligned with our core risk management principles, we aim to continuously enhance risk management, governance and refine our policies and procedures. Our focus is on exploring more advanced measurement methods and adopting sector best practices to drive ongoing improvement. Through these efforts, the risk function ensures a well-calibrated balance between risks and returns, preserving the Bank's financial strength while contributing to its sustainable growth.



VALUE CHAIN MANAGEMENT

At Odeabank, we engage with all stakeholders to foster long-term shared value across the entire value chain. We prioritize meeting stakeholder expectations, enhancing satisfaction, and creating mutual benefits. In line with our commitment to generating positive impacts, we embrace responsible procurement and actively implement social responsibility initiatives.

In addition to our shareholders, we categorize our key stakeholders into three main groups: employees, customers, and public institutions, including regulatory bodies. We engage with each stakeholder group through both direct and indirect communication channels. The frequency of these communications is determined either on a periodic basis or as needed, in full alignment with legal requirements.

The communication methods defined by the Bank for each stakeholder group are as follows:

Stakeholders	Communication Method
Employees	- Email, phone and face-to-face meetings - Meetings and trainings - Digital communication tools - Digital training programs - Employee satisfaction surveys - Special events for employees - Committee meetings - Announcements and notifications - In-house publications - Social media
Customers	- Customer satisfaction surveys - Email, phone and face-to-face meetings - Customer visits and meetings - Exhibitions, conferences, fairs - Website - News - Social media - Request/grievance sites
Public Institutions and Legislative Bodies	- Periodic reporting - Meetings and conferences - Email, phone and face-to-face meetings - Audits

Supply Chain Management

Through the Internal Services and Banking Support Department, which manages the procurement processes of goods and services, Odeabank prioritizes suppliers who comply with the Bank's Code of Ethics and offer a competitive advantage. In procurement processes conducted in accordance with the procedures for the acquisition of goods and services, both suppliers and the goods and services themselves are subject to risk assessment. As of 2023, our total number of suppliers stands at 357.

Additionally, as a precious metals intermediary institution operating in the Borsa Istanbul Precious Metals Market and acting in compliance with stock exchange regulations, international standards, procedures, and principles, we have established our own responsible supply chain compliance program for precious metals.

You can access our Responsible Supply Chain Compliance Report [here](#).

Cooperation with International Financial Institutions

Since 2016, the International Finance Corporation (IFC), a member of the World Bank Group, the IFC Financial Institutions Growth Fund (IFC FIG Fund), and the European Bank for Reconstruction and Development (EBRD) have been shareholders of Odeabank. To mitigate or eliminate any potential negative impacts that may arise from its lending activities, Odeabank emulates the sustainability approach and best practices of its shareholder, the IFC.

Odeabank continuously strives to enhance its cooperation with international financial institutions. In this regard, the Bank is committed to adopting a comprehensive sustainability perspective that encompasses all aspects of its operations.

In this context, we strengthen the projects we continue to implement to ensure that best practices related to sustainability are integrated into our operational practices through technical assistance opportunities obtained in collaboration with international financial institutions such as IFC, EBRD, Finance-in-Motion, and FMO, which operate in our country.

We develop collaborations with financial institutions to provide innovative solutions and enhance capacity in environmental and social issues.

FINANCIAL EMPOWERMENT

We invest in artificial intelligence and digital technology, offering products and services that drive economic growth.

We develop financial solutions tailored to our customers' needs, with a focus on financially empowering individuals and businesses and supporting foreign trade. With our expert teams in foreign trade and a branch network that covers 80% of Türkiye's exports, we provide robust support for import, export, and international projects, aiming to optimize trade processes. In 2023, we prioritized working with exporters—the primary drivers of Türkiye's economic development and growth.

With innovative services, we secure our clients' foreign trade transactions in several countries, especially in the Middle East. We are also enhancing our export financing solutions for SMEs, collaborating with İhracatı Geliştirme A.Ş. (İGE) to contribute to the progress of our economy.

We are committed to providing the necessary financial support to exporters, value-added sectors, and SMEs, the key drivers of Türkiye's economic growth.





DIGITAL BANKING

The number of financial transactions carried out via our internet and mobile banking channels reached 2.7 million.

In recent years, the banking sector has undergone a profound transformation fueled by digitalization. This shift has accelerated with the rise of fintech companies, the growing adoption of mobile banking applications, and the rapid development of AI-powered solutions. Financial institutions are continuously enhancing their digital infrastructures to provide faster, more secure, and personalized services to their customers. As a result, the banking sector stands among the leading industries in adapting to global digitalization trends.

At Odeabank, we believe that enhancing our customers' access to financial resources and their ability to adapt to a rapidly changing world starts with digitalization. To this end, we closely follow emerging technologies. We offer practical solutions that simplify

banking transactions, continuously develop and update our digital banking channels, and integrate them with physical services to provide the best hybrid (phygital) experience. With our vision to become the leading "phygital" bank of Türkiye, offering the best digital experience integrated with authentic physical services, we provide future-ready solutions and facilitate access to financing. Through additional investments in AI and digital trends, we increase operational efficiency, aiming to consistently improve both customer experience and satisfaction. We remain committed to accelerating access to finance for exporters, value-added sectors, and SMEs, who are key drivers of Türkiye's economic development, and to providing the necessary financial support. Through our phygital banking approach, we continue to create added value for our country and prepare our customers for the future.

All individual and corporate customers enjoy seamless access to our mobile app and internet banking services. These platforms allow them to handle everyday transactions such as money transfers and payments, apply for credit cards, open time and demand accounts in multiple currencies, and invest in products like mutual funds, stocks, bonds, eurobonds, and futures (VIOP). With the support of our smart advisor, Rob'O, they can effortlessly build personalized portfolios. Through the Remote Account Opening feature on our mobile app, customers can become Odeabank clients without ever visiting a branch, easily completing and approving any missing documents online. In 2023, nearly 3,486 customers finalized their documents remotely. The number of financial transactions carried out via our internet and mobile banking channels reached 2.7 million. As we look ahead, our goal is to migrate more branch-based services to our digital platforms, providing customers with streamlined access to all our products and services anytime, anywhere.



70
Number of
installed ATMs

42%
Increase in ATM
Transaction
Volume



DIGITAL BANKING

Through digital channels, we expanded the number of customers benefiting from our phygital banking services by 3.4 times.

We enable our customers to carry out their transactions through 70 ATMs strategically located across Türkiye. To meet customer expectations seamlessly, we implemented various experience enhancement and development projects throughout the year. With the launch of a fee-free initiative in 2023, our customers can now withdraw or deposit cash and check balances five times a month from any bank's ATM across Türkiye, free of charge. Leveraging the strength of our technological infrastructure, we continue to develop security measures against card cloning attacks at ATMs. In 2023, the transaction volume at our ATMs increased by 42% compared to the previous year. Nearly 200,000 Odeabank customers utilized our digital channels, resulting in a 180% increase in mobile transaction volume year-over-year.

Operating under the Retail Banking, our Digital Platforms and Customer Solutions consist of Digital Platforms, the Contact Center, and the Customer Experience and Design units.

Our Digital Platforms aim to deliver seamless, accessible, and personalized experiences to customers through digital touchpoints, including the Odea app, internet banking, our website, and ATMs. As part of the branch digitalization process, we support our relationship managers with AI-powered tools, such as virtual asset assistants, to strengthen customer relations and introduce new value propositions.

The Contact Center operates 24/7 to provide the best solutions tailored to customers' needs. Our Inbound Calls team focuses on delivering fast and high-quality solutions, while the Outbound Sales team connects customers with our products and services. Thanks to our video call-based account opening service, anyone can open an account remotely without visiting a branch and become an Odeabank customer. The Customer Inquiries Management team ensures that customers can reach us across various channels, including social media platforms and provides support when needed.

The Customer Experience and Design Unit is dedicated to enhancing customer satisfaction. By gathering feedback and devising innovative strategies, the team designs personalized customer journeys and experiences. Working closely with other teams, they aim to instill a customer-centric culture throughout Odeabank.

In 2023, we launched our Advanced Analytics Unit for the first time, positioned under Retail Banking and integrated into the CoE (Center of Excellence) organizational structure to serve the entire bank. The unit develops AI-based solutions using existing and potential data sources to meet the Bank's needs. Its key focus areas include optimizing deposit pricing, increasing investment returns in line with customer risk expectations, and enhancing customer satisfaction.

We gather customer feedback to devise innovative strategies and design personalized customer experiences that align with these strategies.



DIGITAL BANKING

The Odea app, revamped in 2023, earned international recognition for its design excellence, receiving the A'Design Bronze Award and Red Dot Design Award.

Innovative Services and Products

In today's fast-paced digital world, we offer intuitive solutions that keep up with the evolving needs and expectations of our customers. Through personalized, future-ready products and services, we strengthen our relationships with existing customers while expanding our reach to new ones. By harnessing the power of technology, we secure a competitive edge and elevate customer satisfaction at every step. Our strategic investments in AI and cutting-edge technologies enable us to introduce innovative products and services that actively contribute to economic growth.

Open Banking

Through our Open Banking feature, we enable both individual and business customers to access and manage their accounts from other banks through the Odea app experience. Without the need for any additional application process, customers can easily link their external accounts to Odea and conduct secure transfers and payments, all within a single platform.

Odea App

In 2023, we introduced the redesigned Odea app with a new corporate identity, focusing on investment-centered banking under the motto, "You Are at the Center of Investment." The app offers personalized financial advisory services, exclusive digital products, and free money transfers through digital channels, setting Odeabank apart in the sector. It also enables customers to monitor and manage platinum and palladium investments directly on their mobile devices. Additionally, users can trade stocks listed on Borsa Istanbul via the app's integration with the BIST platform. The Odea app includes Akademi'O, an educational platform that provides videos, articles, podcasts, and

newsletters to enhance financial literacy. Users can stay up-to-date with market developments through the "Investment News" section and track key financial events using the Economic Calendar feature. Important events can also be added to personal calendars. For seamless transactions, users can create or update passwords using the NFC technology embedded in new ID cards. The Odea app has been downloaded over 220,000 times, with a 180% increase in transaction volume compared to the previous year. The Odea app, revamped in 2023, received international acclaim by earning the A'Design Bronze Award and the prestigious Red Dot Design Award.





DIGITAL BANKING

The launch of Odea Radio gave us the opportunity to amplify our investment-focused content to a broader audience.



With our vision to become the leading “phygital” bank of Türkiye, offering the best digital experience integrated with authentic physical services, we provide future-ready solutions.

Rob’O

We introduced Rob’O, the first AI-powered product in banking applications in Türkiye. Rob’O recommends fund portfolios tailored to customers’ selected risk profiles, helping them access suitable investment tools. It was launched as an investment platform that provides time-saving suggestions by recommending adjustments to these portfolios at regular intervals, considering market dynamics. This platform encourages customers to explore investment opportunities, fostering healthy savings habits without the need for constant market monitoring. Rob’O also features a user-friendly interface, allowing customers to experiment with virtual portfolios, making it unique among similar platforms.

Investment-Focused Podcast and Investment Focus of the Week

In 2023, we launched an Investment-Focused Podcast series under the theme “You Are at the Center of Investment” to support financial literacy. Hosted by Güzem Yılmaz Ertem, the series featured 14 episodes with leading investment experts. Additionally, we provide Investment Focus of the Week, an audio bulletin prepared by Berk Sezgin, our Head of Investment Research and Strategies, highlighting key developments in global markets. The bulletin is released every Monday through the Odea app.

Odea Radio

We also launched our digital radio, Odea Radio to enhance our investment-focused banking approach while offering listeners a curated selection of local and international music. The station features content from sector experts to engage audiences interested in transforming savings into investments, contributing to economic growth. Our first broadcast on October 29 celebrated the centenary of the Turkish Republic with a special 12-episode podcast series titled “100 Years of the Republic with İlber Ortaylı.” Furthermore, Odea Radio stands as Türkiye’s first and only bank radio station broadcasting 24/7.



TECHNOLOGY AND OPERATIONS

At Odeabank, our goal is to continuously evolve and enhance the technological infrastructure that supports our operations.

In the banking sector, ensuring secure, uninterrupted, and efficient operations is essential for customer satisfaction and long-term competitiveness. Strengthening technological capabilities not only enhances service delivery but also fortifies security against rapidly evolving cyber threats. With this in mind, we remain focused on continuously modernizing our infrastructure, safeguarding data at the highest standards, and solidifying our position as a dynamic, forward-looking institution.

The Technology and Operations Unit ensures that transactions across the Head Office, branches, and direct banking channels run seamlessly, complying with regulatory requirements. Throughout 2023, the unit carried out 50 large-scale strategic projects aligned with banking regulations, operational risks, market dynamics, and the needs of senior management and business units. These projects aimed to accelerate digital transformation, boost efficiency, strengthen security, and enhance customer service. As part of these efforts, we upgraded our infrastructure, improved data management capabilities, and integrated innovative technologies like artificial intelligence (AI) and robotic process automation. Through system modernization, enhancements to mobile and online banking platforms, and other operational improvements, we achieved cost savings and strengthened business continuity. Furthermore, we established big data platforms and launched generative AI initiatives, supporting our goal of fostering sustainable growth while enhancing customer satisfaction.

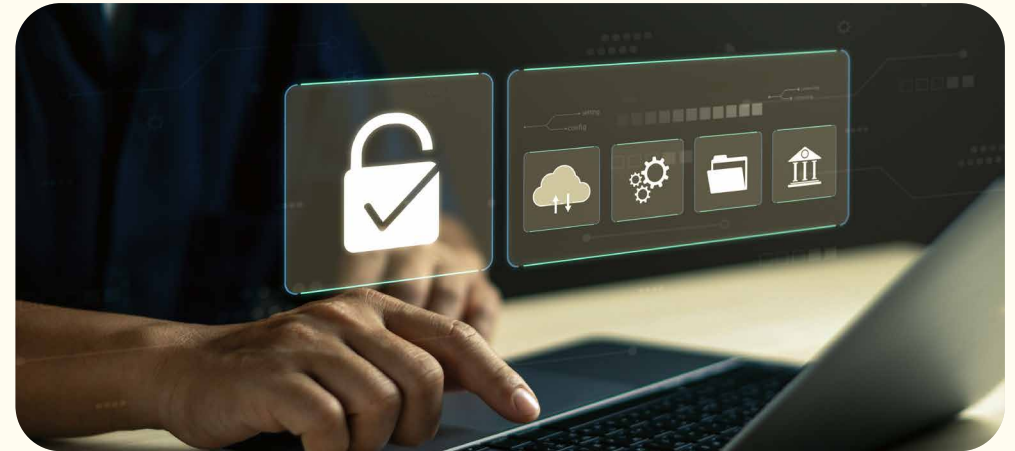


The Technology and Operations Unit carried out 50 large-scale strategic projects, aligned with banking regulations, operational risks, and market dynamics.



TECHNOLOGY AND OPERATIONS

We meticulously protect our systems, infrastructure, data, and processes, ensuring the security and integrity of our information assets.

**Odeatech**

In 2024, we launched Odeatech, marking a pivotal step toward efficiently meeting our technological needs and delivering a fast, secure banking experience. Odeatech leads our research and development efforts in information, communication, and AI technologies, driving innovation by developing AI-powered software, methodologies, standards, and analytical solutions. Through these initiatives, we not only aim to enhance operational efficiency but also elevate the customer experience. Additionally, as we plan to extend Odeatech's services to institutions both in Türkiye and abroad, we believe it will further bolster our competitive edge in the technological landscape.

Innovation Cycle

Through our Innovation Cycle program, an open innovation initiative, our Innovation and Consultancy team collaborates with business units to identify technological needs and brainstorm creative solutions. Following initial evaluations, we identify potential topics and explore partnership opportunities. Promising ideas are implemented through Proof of Concept (PoC) initiatives, enabling us to meet technological requirements while improving processes and creating operational savings.

Cybersecurity and Data Protection

The World Economic Forum's Global Risks Report 2023 ranks "widespread cybercrime and cyber insecurity" among the top global risks of the next two years. As technology becomes more deeply embedded in everyday life, cyber threats are intensifying. At Odeabank, we adopt a robust risk management approach to safeguard our information assets. In line with this approach, we meticulously protect our information systems, infrastructure, data, and all associated processes. To counter the growing threat of cyberattacks, we continuously enhance our human resources, processes, and technological infrastructure.

In 2023, we conducted a comprehensive Maturity Assessment of our cybersecurity standards, evaluating them within the framework of international norms and local regulations to identify potential areas for improvement. These efforts were implemented to strengthen the infrastructure required for the effective detection, reporting, and response to cyber threats. Emphasizing the human element as the first line of defense, we also provided regular training and awareness programs for employees and stakeholders to strengthen their cybersecurity awareness.



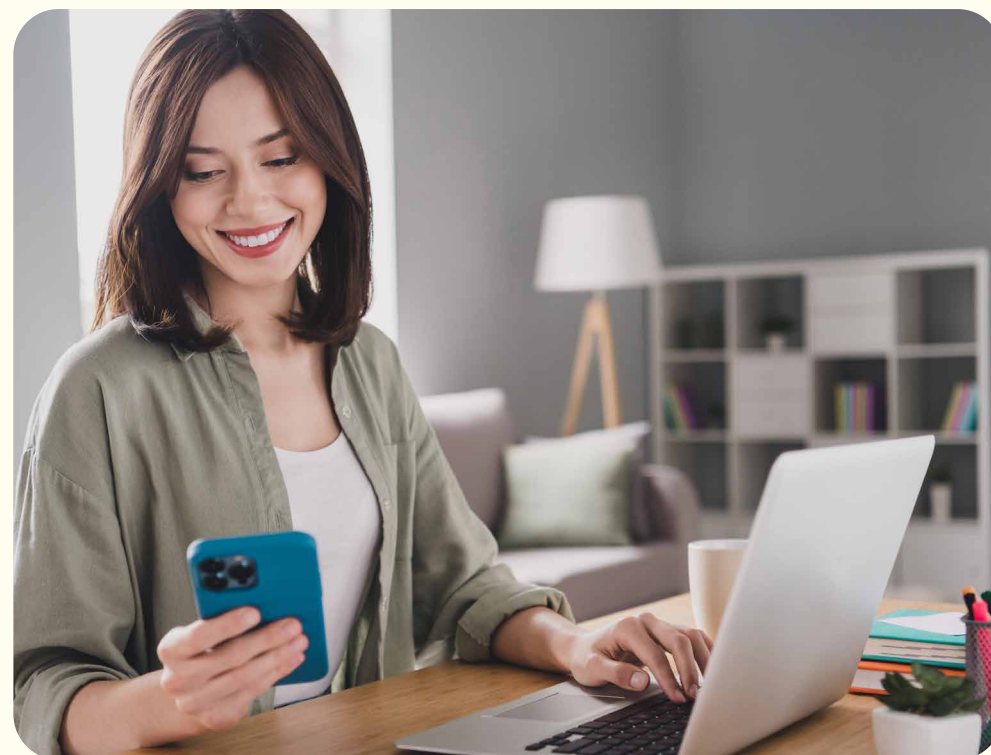
CUSTOMER EXPERIENCE AND SATISFACTION

In 2023, we expanded our total active customer base by nearly 1.5 times.

We see customer satisfaction not merely as a goal but as one of the essential pillars of sustainable success. Our aim is to thoroughly understand our customers' needs and provide them with the best products and services. We are dedicated to delivering an end-to-end superior customer experience across every touchpoint, continuously developing structures that ensure the highest levels of satisfaction. The Customer Experience and Design Unit focuses on collecting and analyzing customer feedback, setting strategies based on insights, and enhancing engagement through personalized experiences and innovative services. As a result of these efforts, we expanded our total active customer base by nearly 1.5 times in 2023.

Aligned with our phygital banking vision, we support the financial assets and business models of our individual and corporate customers through practical

solutions. With digital services and fintech innovations, we accelerate their access to finance, ensuring they stay future-ready. We highly value customer feedback, including suggestions, requests, complaints, and appeals. Our feedback channels include the Odeabank website, branches, digital platforms, contact center, social media accounts, email, mail, fax, Headquarters phone line, official government websites, and other social media tools. All customer notifications are carefully reviewed and resolved in accordance with the Customer Feedback Management Procedure, and timely responses are provided. As part of our commitment to delivering exceptional service, we continuously work on shortening resolution times. In 2023, we successfully resolved all 6,228 customer complaints received.



We regularly measure customer loyalty and satisfaction through surveys conducted by an independent research company. In 2023, we surpassed our NPS target for individual banking services, with our retail, commercial, and private banking customers rating us as “excellent” compared to the sector average. To further strengthen our measurement methods and ensure swift responses to customer requests, we completed the purchase and implementation of the Voice of Customer (VoC) platform in 2023. This platform now

enables us to assess product and service satisfaction levels based on customer interactions across various touchpoints.

We prioritize not only the satisfaction of our customers but also the privacy of their information. As part of our Fraud Prevention efforts, we proactively inform customers twice a year through SMS, email, and push notifications to minimize the risk of fraud exposure. You can access the Odeabank Privacy Policy [here](#).

RESPONSIBLE TRANSFORMATION FINANCE

We ensure compliance with all environmental and social regulations while encouraging our customers to align with them as well.

We are taking decisive steps to support our customers in the transition to a low-carbon economy. We actively promote responsible transformation not only within our own operations but also through the financial services we provide. Through our continuously evolving products and services centered on social and environmental responsibility, we aim to empower exporters and SMEs in their journey toward responsible transformation.



The 9th Sustainable Finance Forum, where we participated as one of the sponsor banks, took place in November at Borsa İstanbul, in collaboration with SKD Türkiye and UN Global Compact Türkiye. The forum highlighted key issues in the business world regarding sustainable finance and aimed to promote best practices. Our Deputy General Manager for Treasury, Capital Markets, and Financial Institutions, Emir Alpay, represented us at the forum, focusing on “Sustainable Development Focus in External Resource Procurement by the Financial Sector and the February 6 Earthquakes.” We take pride in sharing our expertise and efforts at the forum, which brought together professionals from Türkiye and around the world to explore financing for green and earthquake-resistant cities through alternative sustainable resources.

CLIMATE CHANGE

We accelerate the transition to a low-carbon economy through responsible financing solutions aimed at combating climate change.

We place our commitment to combating climate change at the heart of all our operations and accelerate the transition to a low-carbon economy through responsible financing solutions. The long-term goal outlined in the Paris Climate Agreement aims to limit global warming to well below 2°C, ideally 1.5°C, compared to pre-industrial levels. Achieving this goal is crucial to preventing the most severe impacts of climate change. In line with Türkiye's pledge to achieve net zero emissions by 2053, we operate with full awareness of the banking sector's pivotal role in addressing global climate challenges. Our efforts extend beyond reducing our own carbon emissions; we also engage our customers in this transformative process, encouraging shared responsibility.

The future is being shaped by rising temperatures alongside stringent environmental and social regulations. New regulations around environmental sustainability and corporate responsibility present opportunities as well as risks for the private sector. Mechanisms such as the Carbon Border Adjustment Mechanism (CBAM) and the Corporate Sustainability Due Diligence Directive (CSDDD) are particularly critical for exporters who drive high value-added production in our economy, requiring them to adapt to these evolving standards. We support our customers through products and services designed to facilitate compliance with these regulations.



While offering financing solutions that drive the green transition for our customers, we actively work to reduce the indirect emissions linked to our products and services.

We take an active role in the fight against climate change by reducing both our direct and indirect environmental impacts. While offering financing solutions that drive the green transition for our customers, we actively work to reduce the indirect emissions linked to our products and services. At the same time, we continue to implement energy-efficient initiatives across our operations, focusing on reducing greenhouse gas emissions.

Through the development of responsible products and services, we create added value for our customers' operations. In doing so, we not only support their sustainable transformation but also contribute to reducing our own environmental footprint. Additionally, our energy efficiency initiatives within the Headquarters and branch offices, the use of renewable energy sources, and other sustainable practices help us mitigate any potential negative environmental impacts.



ENVIRONMENTAL AND SOCIAL RISK MANAGEMENT IN LENDING ACTIVITIES

We manage our lending processes by incorporating environmental and social risks.

We are aware that our environmental impact extends beyond our own operations to include the loans and project financing we provide. In this regard, we develop products and services that enhance our customers' ability to comply with legal requirements and minimize the environmental and social impacts of the projects we finance. By offering financing solutions that address environmental and social risks and support the transition to a low-carbon economy, we actively participate in responsible transition financing. While ensuring full compliance with national environmental and social regulations, we also encourage our customers to align their operations accordingly. For financed projects, we identify the necessary measures to reduce environmental and social risks, focusing particularly on those that enhance energy efficiency, utilize renewable energy sources, and promote effective waste management.

In line with sustainable banking principles, we prioritize monitoring and managing the environmental and social impacts of the loans we provide. Through these efforts, we aim to minimize risks, contribute to sustainable development goals, and promote societal well-being. This approach helps us effectively mitigate the indirect risks associated with banking activities.

Since 2013, we have incorporated environmental and social risks into our lending processes. Our evaluation procedures adhere to our Environmental and Social Policy and Procedures, as well as the List of Prohibited Activities. In line with this, we do not finance any activities that carry high environmental or social risks. In 2016, we expanded the scope of our evaluation to include all corporate, commercial, and SME loans, regardless of loan amount.

List of Prohibited Activities

All Odeabank's credit transactions are evaluated within the framework of its Environmental and Social Policy. The Odeabank List of Prohibited Activities, based on the list set by the International Finance Corporation (IFC), excludes any support for activities involving human rights violations, child labor, forced labor, the production and trade of weapons and ammunition, waste products and hazardous materials listed in relevant legal regulations, or activities posing significant risks to biodiversity. Upholding these principles, we remain committed to implementing sustainable and responsible financing practices.

You can access Odeabank's Environmental and Social Policy and List of Prohibited Activities **here**.





ENVIRONMENTAL AND SOCIAL RISK MANAGEMENT IN LENDING ACTIVITIES

We categorize the project loans we allocate based on risk levels into three main categories.



We focus on supporting projects that enhance energy efficiency, leverage renewable energy sources, and promote effective waste management.

To assess the environmental and social risks associated with corporate, commercial, and SME loans, we implement the Environmental and Social Risk Assessment Procedure. This procedure is based on our Environmental and Social Policy and aligns with standards from international organizations, including the International Finance Corporation (IFC) and the European Bank for Reconstruction and Development (EBRD). Designed to minimize the environmental and social impacts of financed projects, this assessment model is regularly updated in line with sustainability principles.

Operating under the Credit Division, the “Environmental and Social Risk Team” carefully analyzes loan applications and evaluates the environmental and social risks of projects. This process begins at Odeabank branches and proceeds with the coordination of the Environmental and Social Risk Assessment Team, Branch Marketing, Corporate and Commercial Credit Allocation, and Credit Coordination units. “The Environmental and Social Management System Risk Assessment Form” guides the identification of necessary actions through a decision matrix, ensuring that projects are classified according to their sector’s environmental and social risk categories, in compliance with international standards.

We categorize the project loans we allocate based on risk levels into three main categories: Category A for high-risk projects, Category B for medium-risk projects, and Category C for low-risk projects. This classification follows EBRD standards, with a primary focus on effectively managing the environmental and social risks of all projects.

During the risk assessment process, we conduct comprehensive evaluations of several key areas. These include the project’s use of natural resources, pollution prevention strategies, adherence to labor rights, and the provision of safe and secure working conditions. Additionally, we assess the potential impacts on public health, safety, and security, ensuring community engagement and evaluating the transparency of information sharing throughout the project’s lifecycle.



ENVIRONMENTAL AND SOCIAL RISK MANAGEMENT IN LENDING ACTIVITIES

With the aim of raising awareness about the climate crisis, we launched the Green Transition Loan in 2024.

As part of the lending process, we collaborate with independent consultants when necessary to assess the social and environmental impacts of projects. These assessments result in Environmental and Social Due Diligence (ESDD) reports, outlining strategies and action plans to effectively manage and mitigate identified risks. Based on the decision matrix, we also work with consultants to monitor and audit projects to ensure compliance with environmental regulations and applicable IFC Performance Standards.

In 2023, we continued monitoring the environmental and social impacts of previously financed projects, ensuring their alignment with sustainability criteria.

Impact-Driven Products and Services

Green Transition Loan

Expanding our sustainability efforts and raising awareness about the climate crisis, we launched the Green Transition Loan in 2024. This loan aims to provide favorable financing for commercial enterprises investing in renewable energy and energy efficiency projects. Our goal is to finance these projects exclusively with the Bank's equity capital, without relying on external financiers. Additionally, through our strategic partnership with İhracatı Geliştirme A.Ş. (İGE), we offer specially secured loans to exporting companies.



Throughout the loan process, we guide and support our customers. With our 360-degree sustainability approach, we review all operations and provide consultation on sustainable finance, climate crisis solutions, and responsible investments through specially trained branch portfolio managers, whom we refer to as "Sustainability Ambassadors." These ambassadors actively monitor and report the environmental and social impacts of funded projects, contributing to the success of our customers.

Green Deposit

We empower our commercial customers to contribute to sustainable development goals on both national and global scales, not only through their investments but also through their savings. With our Green Deposit product, we aim to further enhance our contribution to the green

transition. This product adds value to our customers' deposits by offering competitive interest rates while committing to channeling all generated funds exclusively toward environmentally friendly and sustainable projects.

Women in Export Support Package

In collaboration with İhracatı Geliştirme A.Ş. (İGE), we provide specially secured loan opportunities tailored for women entrepreneurs, supporting Türkiye's sustainable development goals. Through our "Women in Export Support Package," we offer favorable financing to export companies led by women, backed by İGE guarantees. We believe that equal participation of women in the workforce is a powerful driver of the global economy, and this collaboration aims to increase Türkiye's export potential.

MANAGEMENT OF DIRECT ENVIRONMENTAL IMPACTS

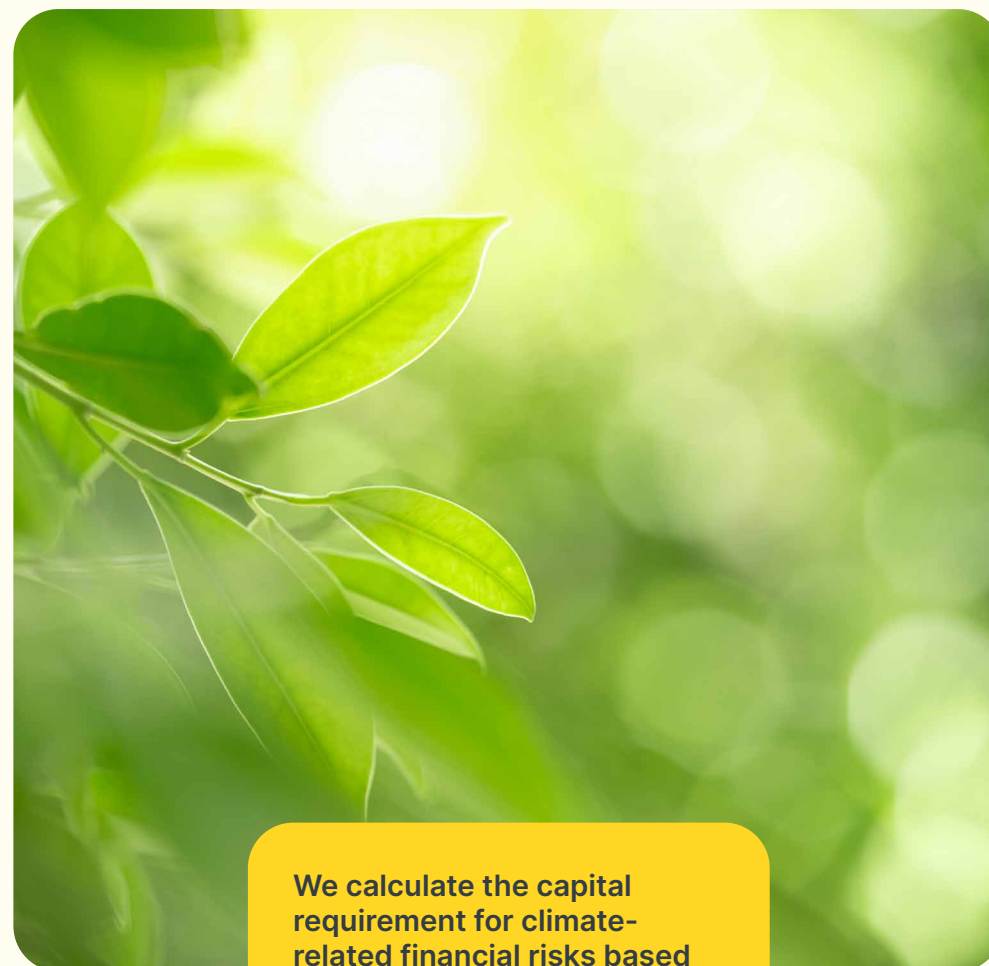
Through our Sustainable Energy Management Platform, we have prevented 5,058 tons of CO₂ emissions as of 2023.

We continuously improve our operations to promote responsible resource use and reduce our direct environmental impact. Our strategies focus on enhancing energy efficiency, sourcing energy from renewable resources, and minimizing paper consumption through digitalization, accelerating our operational transformation. Through continuous monitoring and innovative solutions, we aim to further strengthen our environmental performance.

We measure our environmental performance annually through regular monitoring by our Internal Services team. Guided by the principle of integrating climate-related risks and opportunities into our business processes, our Working Group, led by the Sustainability Department, evaluates environmental actions. Upon completion of a secondary assessment, recommended actions are

promptly implemented. We also calculate the capital requirement for climate-related financial risks based on identified transition risks and incorporate these into our internal capital needs. Under the Internal Capital Adequacy Assessment Process (ICAAP) report framework, we comprehensively report on risks following the guidelines set by the UN Environment Programme's Task Force on Climate-related Financial Disclosures (TCFD).

In addition to these efforts, we aim to further address the risks and opportunities brought by the climate crisis in the coming period by managing and reporting within the TCFD framework. Our goal is to extend this awareness throughout our entire ecosystem, continuously assess our risks, and integrate the climate crisis—along with its environmental and socio-economic impacts—into our business model.



We calculate the capital requirement for climate-related financial risks based on identified transition risks and incorporate these into our internal capital needs.



MANAGEMENT OF DIRECT ENVIRONMENTAL IMPACTS

We closely monitor the energy consumption of our branches, achieving significant savings in electricity usage.

Energy Management and Efficiency

Aligned with our vision of minimizing environmental impact, we continue to take decisive steps to source energy for our branches from renewable resources. We have maintained our commitment by obtaining the I-REC certificate in 2023, ensuring that the energy used in our branches is derived from renewable sources.

Since 2016, we have actively utilized the Sustainable Energy Management Platform to drive continuous improvement. This platform enables the real-time tracking of energy consumption, compensation systems, generators, and UPS equipment across all our branches using blockchain technology. As a result, energy management has become more efficient and effective, minimizing environmental impact caused by energy use.

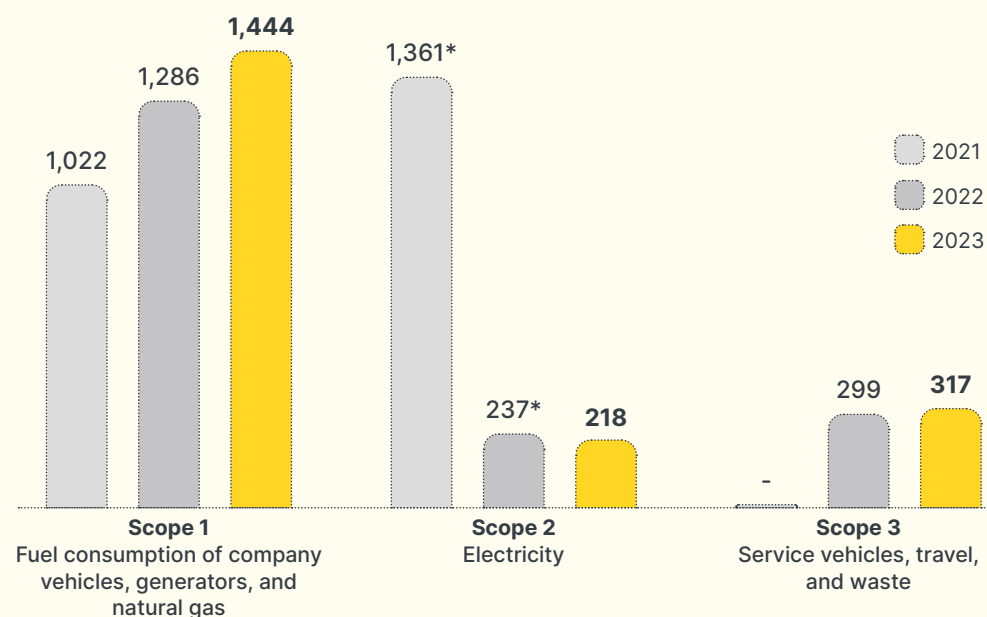
The platform's capabilities allow detailed tracking of branch energy consumption, including after-hours usage, resulting in significant energy savings. Remote interventions during generator or UPS malfunctions also minimize downtime, ensuring energy continuity. Additionally, by avoiding reactive penalties and optimizing consumption, we have achieved cumulative energy savings of 9.7 MWh since the platform's implementation.

We also plan to conduct training programs in 2024 to raise awareness among branch employees about energy management and efficiency practices.

In 2023, we calculated our total Scope 1, 2, and 3 greenhouse gas emissions at 1,941 tons. The Sustainable Energy Management Platform contributed to reducing Scope 2 emissions by optimizing energy consumption, supported by our use of I-REC-certified renewable electricity. Our Scope 3 emissions amounted to 317,297 tons of CO₂e. While there was a decrease in office commutes during the post-pandemic period in 2022, the resumption of office operations in 2023 led to a slight increase in Scope 3 emissions.



Greenhouse Gas Emissions (tCO₂e)



* Values have been recalculated using the market-based emission methodology.



MANAGEMENT OF DIRECT ENVIRONMENTAL IMPACTS

Through the mobile Q-matic application we developed, customers can obtain queue numbers digitally, eliminating the need for paper.

Responsible Use of Resources

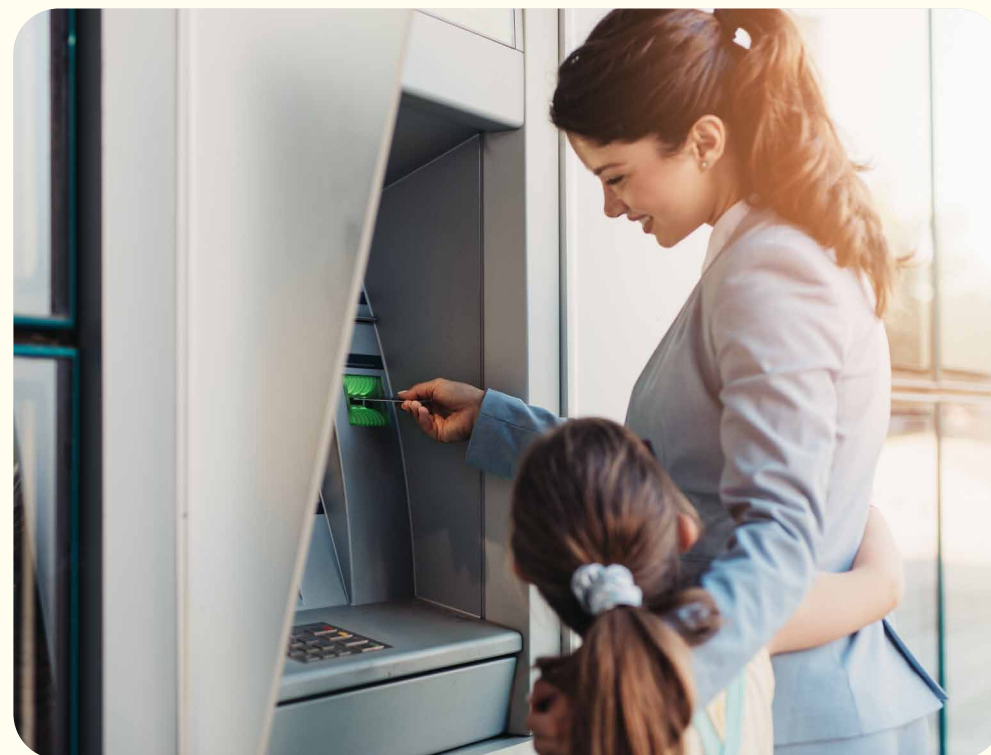
We conduct our operational activities with a strong commitment to environmental responsibility. By transitioning branch documents to electronic formats, we minimize paper consumption. Through the mobile Q-matic application we developed, customers can obtain queue numbers digitally, eliminating the need for paper. Additionally, after ATM transactions, we send notifications via SMS or email instead of issuing paper receipts, reducing our environmental footprint while expanding our digital service network and enhancing the customer experience. At both our headquarters and branches, we continue efforts to reduce the use of single-use plastics. We actively promote recycling and responsible resource use through targeted actions.

We recognize that taking action against water scarcity driven by climate change, including rising temperatures and shifting precipitation patterns, is crucial for securing our future. To address this, we implement water efficiency initiatives. At Odeabank, we prioritize the efficient use of water in both our headquarters and branches. Internally, we encourage practices that promote water conservation.

We have added battery recycling bins next to the waste separation bins in our headquarters. To foster positive habits, we raise awareness about responsible water and paper towel usage through internal announcements and environmental management training. These initiatives aim to increase access to sustainable practices and enhance awareness, supporting effective resource management. As part of these efforts, we recycled 296 kg of electronic waste in 2023.

In 2015, we introduced a courier service using reusable bags, reducing paper consumption for inter-branch file transfers. By replacing traditional paper-based courier and postal services with digital solutions, we further reduced our carbon footprint. In 2023, thanks to the use of the Registered Electronic Mail (KEP) and the National Electronic Notification System (UETS), we prevented approximately 5.9 tons of CO₂ emissions.

To amplify the impact of our initiatives, we completed the Environmental Impact Management Training for branch managers and branch operations managers through an online platform in 2024. This training emphasized the importance of efficient resource management and the actionable steps branches can take to improve environmental performance.



HUMAN-CENTERED BANKING

We focus on cultivating a culture that promotes equal opportunity and inclusive growth.

At Odeabank, we strive to empower all stakeholders and the broader community. Our social investment programs focus on key areas such as women's empowerment, gender equality, and enhancing financial and digital literacy. At the core of these initiatives is our workforce. Since our inception, the vision that "our greatest asset is our

human resources" has been fundamental to our operations, reflecting our belief in the value of employee motivation, engagement, and well-being. We prioritize employee health, focusing on effective talent management to grow together as a cohesive team.

We develop initiatives that integrate our core values and the employer brand concept "Odealist" into the fabric of Odeabank's culture.



EMPLOYEES

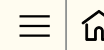
We deepen our human-centered approach by prioritizing employee well-being, diversity, and inclusion.

Through our people-first business model, we cultivate internal relationships in an equitable, objective, transparent, and value-driven manner, free from any form of discrimination. Guided by our core values of diversity, equity, and inclusion, we aim to attract new talents to our Bank while fostering the continuous development of our skilled workforce to build a sustainable corporate structure. We achieve this goal by adhering to the principles outlined in the Odeabank Human Resources Policy, which serves as a guiding framework for employees, promoting ethics, discipline, and compliance with the regulations governing our operations.

You can access the Odeabank Human Resources Policy [here](#).

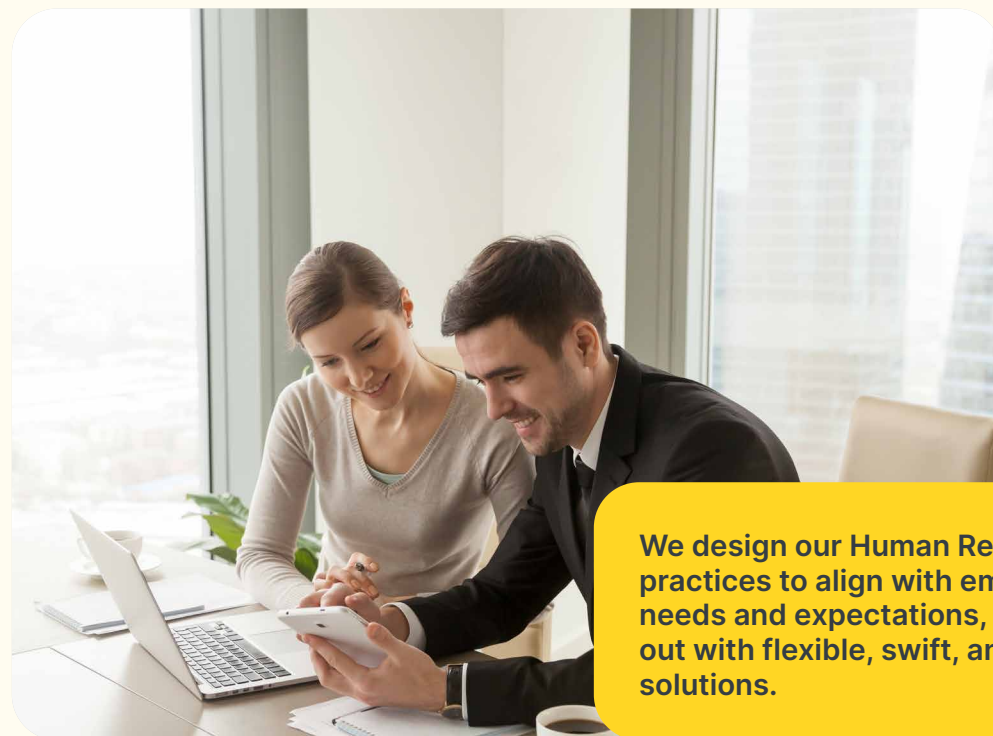
In addition to the Human Resources Policy, we crafted an employee handbook in 2023, reflecting the concept of our employer brand, “Odealist.” This handbook outlines our daily work practices, the behaviors we expect from employees, and the essence of Odeabank’s working culture. Furthermore, to embed the values launched under the new employer brand in 2022 into our organizational culture, we introduced the “Odealist Value Awards” in 2023. This initiative recognized employees who embodied these values, selecting them as the Bank’s first culture ambassadors.





EMPLOYEES

As of 2023, our workforce comprises 1,284 employees, driven by a team culture that fosters continuous learning and growth.



We design our Human Resources practices to align with employee needs and expectations, standing out with flexible, swift, and efficient solutions.

At Odeabank, we develop our Human Resources practices using scientific methodologies, ensuring they are compliant with regulations and aligned with the needs and expectations of our employees. Our HR operations, characterized by their dynamic nature and ability to offer flexible, swift, and effective solutions, have been organized under four core functions as of September 2023: the "Agile Transformation Office," "Organizational Development, Process and Capacity," "Culture and Talent Management," and "Rewards, Performance and Analytics." To further enhance communication between employees and the HR teams, and to simplify access to information, we have introduced a 24/7 "Employee Support Line." In addition, to actively gather feedback, ideas, and suggestions, we conduct regular visits to all branches and departments each year, ensuring that we maintain open and continuous dialogue across the organisation.

- **Agile Transformation Office:** Analyzes all methods and processes to develop and monitor the progress of agile working practices in line with the Bank's objectives.

- **Organizational Development, Processes, and Capacity:** Oversees capacity planning, organizational analysis, and the design and modeling of processes, ensuring effective and efficient management aligned with the Bank's strategies and needs.
- **Culture and Talent Management:** Focuses on maximizing the efficiency of human resources and designing career journeys to foster growth, supported by relevant policies.
- **Reward, Performance, and Analytics:** Develops remuneration, fringe benefits, and other reward management programs within the framework of the Bank's reward policy.

Our operations are guided by the vision, mission, and values—our cultural codes—redefined in 2022. Within the framework of Odeabank's employee value proposition, we combine our strategy and action plans with a culture of teams open to learning and growth. As of 2023, our workforce comprises 1,284 employees. Maintaining our commitment to gender equity, 58% of our employees are women and 42% are men, positioning us above the sector average in terms of female representation.

Total Workforce by Age Group	Female	Male	Total
Under 30	201	138	339
30-50	526	363	889
Over 50	22	34	56



EMPLOYEES

We foster an equality-driven work environment free from any discrimination among our employees.

Equal Opportunity and Diversity

Research shows that fostering equal opportunity and diversity in the workplace significantly enhances performance and boosts innovation capacity. Studies indicate that companies focused on diversity, especially in leadership roles, achieve 25% higher profitability on average compared to their competitors and improve decision-making processes. Accelerating efforts in this area not only improves employee satisfaction scores and talent attraction capabilities within an ethical framework but also creates a unique advantage for competitiveness and long-term success¹.

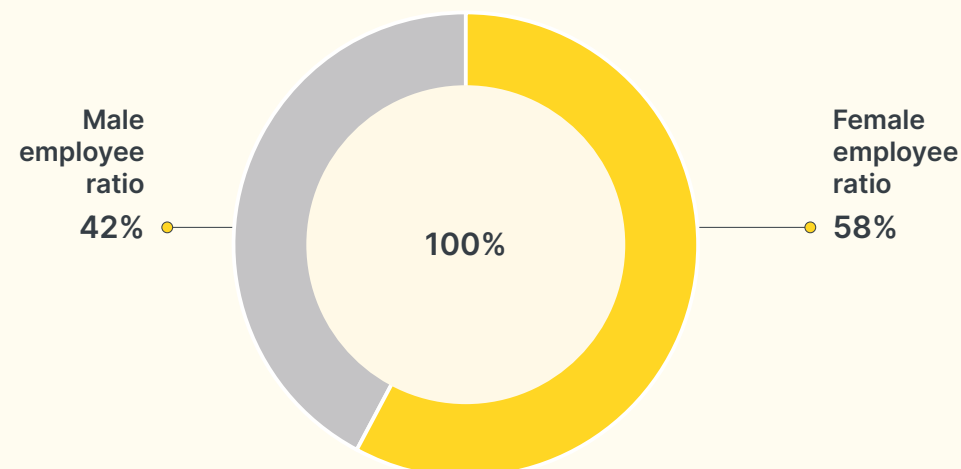
At Odeabank, we believe that our workplace culture has far-reaching social impacts, not only on our current employees but also on the wider community. We are committed to eliminating gender inequality and fostering

a fair and equal working environment. Equality is at the core of both our social investment initiatives and our working model. Guided by the Odeabank Human Resources Policy, we ensure a discrimination-free environment, regardless of religion, language, race, gender, age, sexual orientation, marital status, or physical appearance. In cases where discrimination occurs, we apply sanctions through our Disciplinary Committee within the framework of our Ethical Principles. Furthermore, as a signatory of the United Nations Women's Empowerment Principles (UN WEPs), a global private sector initiative promoting gender equality, we reinforce our commitment to advancing gender equality in the workplace.

Aligned with our vision of promoting the highest standards of equal opportunity and diversity, as of 2023, we employ a total of 1,284 individuals, consisting of 749 women and 535 men. Furthermore, women make up 45%* of our management team.



In 2023, Odeabank received no complaints related to discrimination, maintaining its commitment to equality.



¹ <https://www.mckinsey.com/featured-insights/diversity-and-inclusion/women-in-the-workplace>

*Includes managerial and higher-level positions.



EMPLOYEES

Odeabank has established a Gender Equality Group focused on promoting equality and inclusion.



Management Level	Female	Male	Total
Non-Managerial*	667	454	1,121
Mid-Level Management	80	69	149
Senior Management	2	12	14

*Includes first-level managers.

Employees by Position	Female	Male	Total
Revenue-Generating Functions	291	195	486
Technology Functions	66	99	165

We believe that embedding the principles of equality and inclusion into the core of our working culture requires the collective effort of all employees. To this end, Odeabank has established a Gender Equality Group focused on promoting equality and inclusion. Following the training they received in 2022, the Group developed Odeabank's Gender Equality Roadmap and designed mandatory training programs based on employees' awareness levels. As of 2023, the Group has continued its efforts by formulating the Odeabank Gender Equality Policy and reviewing salary promotions and all benefits through the lens of equality.

Aligned with our principle of being an accessible bank for all, we prioritize inclusion and equality not only with a focus on gender but also by actively encouraging the employment of individuals with disabilities. Over the past three years, we have consistently maintained a workforce with more than 2% of employees with disabilities.

Total Number of Employees with Disabilities	Female	Male	Total
2021	9	17	26
2022	9	15	24
2023	8	15	23



EMPLOYEES

In 2023, we provided 25 employees with diverse career development opportunities through 26 internal job postings.



In 2023, with 85% participation, 1,090 employees completed the Odeabank Employee Engagement Survey, resulting in a weighted engagement score of 56 and a satisfaction score of 73. Our employee turnover rate for the year was 0.22.

Talent Management

At Odeabank, we view our employees as valuable talents who drive our success. We believe that each individual in our team brings unique skills and perspectives that contribute to our dynamic and innovative culture. Effective talent management is essential to unlocking these talents and fostering both personal and professional growth. By investing in employee development, promoting a supportive and inclusive environment, and offering continuous learning opportunities, we ensure our workforce remains motivated, engaged, and equipped to meet the evolving needs of our customers and markets.

Talent management at Odeabank spans across all company processes, beginning with recruitment. Our recruitment processes are rooted in the principle of equality, focusing on competence, experience, and skills to create a fair and inclusive work environment where employees can fully realize their potential. We utilize a digital onboarding platform to provide a seamless end-to-end recruitment and adaptation experience, improving the orientation process not only for new employees but also for their immediate managers and designated onboarding mentors (Odeavisors).

The talent management journey, initiated at the recruitment stage, continues with a focus on career and

professional development planning. We facilitate career progression through assignments, promotions, transfers, role changes, and international placements, providing employees with diverse career opportunities within the Bank.

We regard internal recruitment needs as a key motivator, offering employees opportunities to grow in their careers and explore different business areas. This approach enables our existing workforce to advance across various departments and functions, opening up significant career opportunities. In all promotions, we prioritize objectivity, equality, and impartiality. The promotion process is managed through a collaborative decision-making framework involving the employee's manager, the Human Resources Department, and relevant stakeholders, ensuring fairness and transparency.

New Recruits and Promotions	Female	Male
New Recruits	256	185
Promotions	111	74

At the core of all our processes lies the satisfaction and well-being of our employees. To ensure we cultivate the desired working culture and continuously improve with timely interventions, we strive to maintain the highest levels of employee engagement. One of the key tools in this effort is our annual employee engagement survey, which gathers insights into employee satisfaction, expectations, and feedback, guiding us in shaping effective action plans based on the analysis of these results.



EMPLOYEES

We define these targets annually, revise them when necessary, and assess them at the end of the year.

At Odeabank, we implement a fair compensation and reward system by considering sector salary averages, job responsibilities, annual performance outcomes, internal equity, and the annual budget. Additionally, we provide fringe benefits tailored to the needs and requests of our employees. As of 2023, our employees are offered private health insurance, transportation assistance, and remote work opportunities.



In addition to the annual survey, we collect suggestions and evaluations throughout the year via the “Fikriniz Değerleniy’O-FİDE” (Internal Suggestion Platform). This platform encourages employees to share ideas aimed at enhancing internal efficiency and reducing costs. Suggestions that pass the initial evaluation are reviewed and rewarded, recognizing the valuable contributions of our workforce.

Performance Management

A key component of our employee experience is the fair and transparent reward and promotion systems we have designed. To encourage success and support employees in achieving their goals, we conduct regular performance evaluations. These evaluations are aligned with the Bank’s goals and vision, focusing on two main pillars: business objectives and behaviors.

At the core of performance evaluations are the individual business targets set for each employee. At Odeabank, we define these targets annually through goal cards for all employees, revise them when necessary, and assess them at the end of the year. For Senior Management, role-based targets aligned with the Company’s strategic objectives are established, while segment-based targets are set for field employees. Since 2022, behaviors connected to corporate values have also been integrated into the performance management system. For departments adopting an agile working style, we complement evaluations with the Objectives and Key Results (OKR) framework. Through this structured and fair performance system, all employees are evaluated using a transparent and measurable approach.

EMPLOYEES

In 2023, we maintained our focus on leadership development as part of our training and development strategy.



In 2023, as part of Odeabank's agile learning strategy, we conducted all assessment, training, and development activities aimed at enhancing both technical and non-technical skills and competencies of our employees through digital channels.

Training and Development

At Odeabank, we take a holistic approach to employee development by organizing programs that promote professional, technical, and personal growth. Our training and development strategies are designed to align with the Bank's long-term goals, ensuring they provide maximum benefit for our employees. Recognizing learning and development as key drivers of success, we aim to cultivate an environment that fosters continuous growth, motivating employees and building a skilled, high-performing workforce.

Odeabank's training and development strategy aims to equip employees with next-generation skills, offer personalized development programs, and enhance learning platforms in alignment with the Bank's core objectives. Technical skill

needs are identified through case studies and assessments, with customized training programs developed accordingly. In addition to these programs, we organize seminars on topics such as economics, data, arts and culture, psychology, and health to meet our employees' lifelong learning needs and foster a multidisciplinary perspective.

Employee Training	2021	2022	2023
Total training hours	20,145	24,623	38,085
Average training hours per employee	18.68	20.80	29.66
Leadership training hours	30.5	170	174

In 2023, we maintained our focus on leadership development as part of our training and development strategy. To support the potential of managers who contribute to the Bank's growth, we partnered with Türkiye's leading educational institutions and universities. Through initiatives like the O'leader Development Program, Portfolio Development Program, and a series of webinars, we expanded our learning culture. As part of the O'leader program in 2023, we conducted initiatives under the theme of "Fostering Innovation," tailored to the needs of our target audience.



EMPLOYEES

We offered 288 hours of mentoring through a program designed for branch managers.

We measured the progress of the 75 participating employees through surveys, using the feedback to refine training content and enhance the effectiveness of their development journey. Additionally, we offered 288 hours of mentoring through a program designed for branch managers, developed in collaboration with Retail-Private and Commercial Banking divisions to support the career paths of our field employees.

For newly appointed managers at our Head Office, we launched a three-month "Leadership Development Program," focusing on building the critical skills and competencies required for their new roles.

While enhancing our internal talent, we continue to invest in the next generation of sector professionals. At Odeabank, we value the early integration of young talent into the workforce and believe in the importance of gaining practical experience early in their careers. To this end, we continue to bring recent

graduates into our workforce through several programs, including the Nova Internship Program, Odealist Talent, Young Sales Talent, and IT Young Talent programs. These programs offer young employees the opportunity to gain practical experience while continuing their development through unique learning experiences.

In August 2023, we launched the Young Talent Program, bringing together 51 young professionals for a one-month development initiative covering core banking, technical skills, professional development, and personal growth workshops. In addition to structured training, participants engaged in interactive sessions with department managers, gaining deeper insights into the Bank and its operations. We aim to further their development through additional learning modules planned throughout the year, ensuring continuous engagement and growth.



We view our employees as an integral part of our business. The solutions we offer our customers are built upon the expertise and dedicated efforts of our talented workforce. In this regard, we organize programs aimed at enhancing our employees' technical capacities in line with our product development initiatives. In 2023, alongside implementing thematic loan programs focused on positive impact, we provided training to integrate sustainability principles into all areas of operation. Led by our Sustainability Department and supported by professional consultants, these sessions covered projects such as Sustainability Strategy Development, Carbon Emission Measurement and Reporting, and documentation of the Sustainability Management System.



OCCUPATIONAL HEALTH AND SAFETY (OHS) APPROACH

Through the Odeaport system, our safety expert and workplace physician provide us with regular updates.

In recognition of the value it places on its human capital, Odeabank places great importance on safeguarding the health and well-being of all employees, creating a safe working environment, and implementing all necessary measures to achieve these goals.

To ensure employee health and workplace safety, we have implemented an OHS Management System. Through this system and in alignment with our OHS Policy, we are committed to taking all necessary measures to protect the health and safety of employees, subcontractors, and visitors, in accordance with current OHS regulations. This policy also emphasizes proactive risk assessment, enabling us to effectively identify and mitigate potential hazards.

OHS management at Odeabank is overseen by an Assistant General Manager reporting directly to the CEO. OHS matters are discussed in routine quarterly meetings, with additional sessions held for urgent or critical issues. These meetings help ensure that all necessary procedures and mandatory instructions are systematically implemented across the organization. We leverage the Odeaport system to conduct safety-related research, deliver updates and recommendations from safety experts and occupational physicians, and communicate new safety measures to employees through email notifications. Risk assessments are conducted on two levels—high-probability and low-probability accidents—and include detailed evaluations of potential incidents such as transportation accidents, electrical hazards, workplace hygiene, physical risks, fire safety, and fall prevention.



Through our annual OHS training programs, we aim to prevent potential occupational illnesses and accidents.

All new employees undergo comprehensive OHS training upon joining the Bank. These trainings are coordinated by the OHS Officer and the Human Resources Training team, with regular reporting to ensure compliance. Employees who complete the required training receive certification, and the validity of these certifications is tracked within the legal timeframe. Through our annual OHS training programs, we aim to prevent potential occupational illnesses and accidents.

At Odeabank, occupational accidents are meticulously tracked, documented, and reported to the Social Security Institution (SGK). In 2023, one workplace accident resulting in injury was reported to the SGK, and all necessary safety measures were implemented accordingly. Additionally, the Worksafe software program continued to facilitate the monitoring and management of OHS activities across the Bank throughout the year.

OHS Trainings	2021	2022	2023
Number of Participants	1,659	350	714
Total Training Hours	13,272	2,800	2,293



SOCIAL RESPONSIBILITY

At Odeabank, we actively embrace comprehensive and impactful volunteer efforts to address social issues.

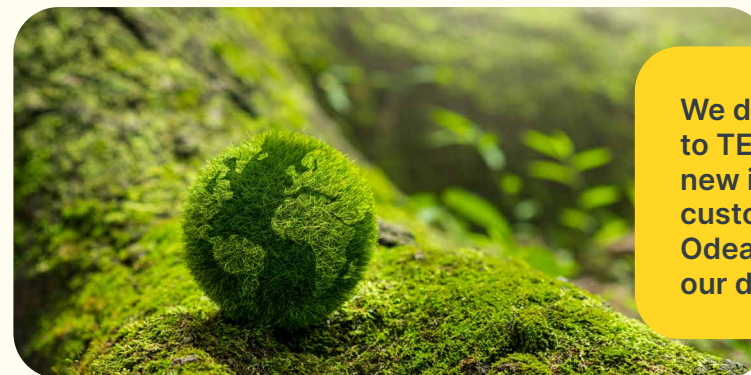
Beyond contributing to sustainable development with the products and services we offer, we strive to create lasting value for society through our dedication to social responsibility. Since our founding, we have taken an active role, both nationally and internationally, in promoting gender equality, empowering women, advancing sports, accessibility, arts, financial literacy, education, cultural development, and reducing environmental impact. Through diverse collaborations, we aim to make a tangible difference in these areas. Our employees and leaders actively embrace comprehensive and impactful volunteer efforts aimed at addressing social issues. Through our social responsibility projects, we create social impact and generate lasting value for the community.

Social Responsibility Projects Carried Out

	2021	2022	2023
Number of Projects	5	4	4

Eşit Masallar (Fair Tales)

Driven by our mission to foster egalitarian values in future generations and ensure equal opportunities for all, we continue to advance the Eşit Masallar (Fair Tales) project, initiated in 2020. Through this initiative, we reimagine beloved fairy tales to inspire parents and children to recognize the importance of gender equality. As of 2023, we have distributed 1 million books to over 1,200 schools, with 310,000 copies provided free of charge and our digital editions receiving over 200,000 views. Expanding the project's impact, we also continued to bring the theater adaptation of our "Eşit Masallar (Fair Tales)" project, now expanded to include themes of nature and environmental awareness, to children. In 2023, the play was staged 14 times in Istanbul and twice in Eskişehir, reaching



We donate a sapling to TEMA for every new individual customer joining Odeabank through our digital channels.

over 11,000 audience members free of charge. To date, the production has been performed 38 times, engaging more than 31,000 children.

Collaborations and Support with NGOs

In 2023, we launched a new initiative in partnership with TEMA (The Turkish Foundation for Combating Soil Erosion, Reforestation, and the Protection of Natural Habitats). As part of this project, we donate a sapling to TEMA for every new individual customer joining Odeabank through our digital channels. This effort resulted in the creation of a 10,000-sapling memorial forest in the Aşağıulupınar Reforestation Area in Malatya.

To mark International Day of the Girl Child on October 11, we supported the Koruncuk Foundation's "Bu İş Çok Zor Yonca" campaign by covering the personal needs of 10 female students for an entire year. On World Animal Day on October 4, we collaborated with Mutlu Patiler (Happy

Paws) on the Kars Susuz Project, providing vaccinations and medical care for puppies in need.

We are also a corporate member of the Million Women Mentors Program, led by TurkishWIN, which promotes gender equality and supports the principles of WEPs. This program connects young women aged 15-25 with sector leaders via digital platforms, offering mentorship to help them achieve their career goals. In 2023, the program expanded beyond STEM fields to welcome young women from all sectors, including high school students, university students, and recent graduates. As part of the initiative, Odeabank volunteers with five or more years of experience serve as mentors, guiding young participants toward their professional aspirations.



SOCIAL RESPONSIBILITY

Through our social responsibility efforts, we play an active role both nationally and internationally, fostering impactful collaborations.

Women in Corporate Life Podcast Series

We expanded our gender equality initiatives aimed at fostering a more equal future by launching the “Women in Corporate Life” podcast series in collaboration with Aposto Radio. This podcast, which we proudly support, explores the challenges women face in corporate environments—whether identified, overlooked, or unnamed—within an academic framework. You can access the podcast episodes [here](#).

Collaboration with “Erişilebilir Her Şey” (Accessible Everything)

To ensure our digital channels are accessible to all users, we partnered with Erişilebilir Her Şey (Accessible Everything) to conduct an assessment and create a roadmap for digital accessibility. As part of this collaboration, we organized Digital Accessibility Training and a webinar titled “Disabled or Obstructed?” for Odeabank employees. Additionally, we made our personal loan agreements more inclusive by incorporating sign language and audio descriptions, ensuring accessibility for individuals with disabilities.

**Earthquake Relief Efforts**

Following the devastating earthquakes in Türkiye, we collaborated with the Turkish Federation of Women's Associations (TKDF) to donate two settlements to the “Mor Yerleşke (The Purple Spaces)” initiative, serving the regions of İskenderun and Malatya. These settlements provide essential services tailored to the needs of women, children, the elderly, individuals with disabilities, and other vulnerable groups. The container units within these centers include spaces for therapy and play for children, along with healthcare, hygiene services, and psychological counseling for women.

We continued to bring the theater adaptation of our “Eşit Masallar (Fair Tales)” project, now expanded to include themes of nature and environmental awareness, to children.



SOCIAL RESPONSIBILITY

Through our social responsibility projects, we create social impact and generate lasting value for the community.

O'art

Since 2015, O'art, Odeabank's art platform, has been dedicated to fostering artistic production, enhancing the visibility of artists and their works, and sustaining meaningful sponsorships within the arts. Embracing digital transformation, O'art brings its exhibitions online, making them accessible to audiences through its website and digital platforms.

In collaboration with Pıksel, O'art pursued its mission to support emerging talent in digital art and new media with three key initiatives during the 2022-2023 period: the Masterclass Program, the New Media Residency Program, and O'art Talks. As part of the Residency Program, ten selected artists were awarded a total of TL 1 million in educational and production grants, with each receiving TL 100,000. In celebration of Odeabank's 10th anniversary, the program also offered two artists an exclusive, fully funded opportunity to collaborate with some of the most renowned new media artists globally. These artists were invited

to participate in Residency Unlimited, one of the most prestigious artist residency programs in the United States, for a two-month period with all expenses covered. Graduates of the program showcased their work in the "Soft Discipline" exhibition, a curated digital group show held at Alan Kadıköy from September 6 to October 6, 2023. The exhibition, curated by Ekmel Ertan in collaboration with the participating artists, offered visitors a compelling glimpse into the dynamic intersections of art and technology.

To mark Odeabank's 10th anniversary, O'art curated the "Onunla" exhibition, showcasing the works of ten artists who have collaborated with the platform over the years. Led by curator Begüm Güney and hosted with venue sponsorship from Fişekhane, the exhibition celebrated this milestone by bringing together a rich array of artistic expressions.

For further details, please visit the official **O'art** website.



Through Odeabank's art platform O'art, 10 emerging artists received grants totaling TL 1 million for education and production.

Festival sponsorships

In 2023, we proudly sponsored the Istanbul Theatre Festival for the third time, organized by the Istanbul Foundation for Culture and Arts (İKSİV). This year's festival, themed "There Is a Woman Behind This," aimed to highlight the role of women in theatre. As part of our sponsorship, several noteworthy plays, including Flu Lysistrata, You Are Not Hamlet, and Sisters, were staged for audiences.

Additionally, we extended our cultural sponsorships to two more festivals in 2023. We supported both the Bergama Theatre Festival and the Creative Children's Festival. At the Creative Children's Festival, we also showcased our Fair Tales play, further promoting our message of gender equality.

O'blog and O'mag

Through O'blog, we continued to share engaging content every month, covering a diverse range of topics including finance, technology, sustainability, savings tips, art and culture, and gender equality. Additionally, O'mag, our arts and culture magazine, featured the latest trends and captivating stories on fashion, culture, travel, art, architecture, gastronomy, and new technologies. Throughout the year, we distributed O'mag to employees across our Head Office and all branches. We also reached broader cultural audiences by distributing the magazine in partnership with Time Out. You can explore both **O'blog** and **O'mag** on our website.

ANNEX 1: ACHIEVEMENTS AND AWARDS

Over the past decade, Odeabank has been honored with nearly 200 awards across various areas.

Over the past decade, Odeabank has been honored with nearly 200 awards across various areas, including product diversity, banking services, digital solutions, and customer satisfaction. The awards we have received over the past three years include:

2021**IDC**

- “Webex-Cloud Collaboration” Third Prize in the Cloud Transition category

Global Banking & Finance Review Awards 2021

- Fastest Growing Private Banking Award

Şikayetvar.com A.C.E Awards

- Banking Segment B Gold Award

The Stevie Awards

- Gold Stevie Award in the Customer Service Training Team of the Year category

Standard Chartered Bank Awards

- Outstanding Quality in Payments Formatting Award for excellence in FC transfer transactions

PRIDA Communication Awards

- Strategic Communication Division, Corporate Social Responsibility Communication – EŞİT MASALLAR (FAIR TALES)
- Gender Equality in Communication Special Award – EŞİT MASALLAR (FAIR TALES)
- Special Awards: Game-changing Project Award – EŞİT MASALLAR (FAIR TALES)
- Special Awards: UNICEF Campaigns That Bring Hope to Children Special Award – EŞİT MASALLAR (FAIR TALES)

Mediacat Felis Awards

- Social Responsibility Section, Felis Award in the “Quality Education” Category – EŞİT MASALLAR (FAIR TALES)
- Social Responsibility Section, Achievement Award in the “Children and Youth Projects” Category – EŞİT MASALLAR (FAIR TALES)

- Social Responsibility Section, Achievement Award in the “Reducing Inequalities” Category – EŞİT MASALLAR (FAIR TALES)
- Branded Content Section, Achievement Award in the “Best Screenplay-Music Match” Category – EŞİT MASALLAR (FAIR TALES)
- Press Section, Achievement Award in the “Purpose-Driven Press and Broadcasting” Category – EŞİT MASALLAR (FAIR TALES)
- PR Section, Felis Prize and Grand Prize in the “Content Production” Category – EŞİT MASALLAR (FAIR TALES)
- Digital and Mobile Section, Felis Award in the “Holistic Digital Campaign” Category – EŞİT MASALLAR (FAIR TALES)
- Media Section, Felis Award in the “Reaching the Target Audience” Category – EŞİT MASALLAR (FAIR TALES)
- Transforming Marketing Impact Section, Felis Award in the “Ground-Breaking Projects/Ideas” Category – EŞİT MASALLAR (FAIR TALES)
- Transforming Marketing Impact Section, Felis Award in the “Positive Social Impact/ Social” Category – EŞİT MASALLAR (FAIR TALES)

Stevie International Business Awards

- Corporate Responsibility – Bronze Award in the Communication or Public Relations Campaign of the Year Category – EŞİT MASALLAR (FAIR TALES)

Kristal Elma (Crystal Apple) Awards

- “Film/Online Film” Section, Silver Award in the “Culture, Art, Sports, Event” Category – EŞİT MASALLAR (FAIR TALES)

Social Media Awards Türkiye

- Gold Award in the “Gender Equality” Category – EŞİT MASALLAR (FAIR TALES)
- Grand Prix Jury Prize – EŞİT MASALLAR (FAIR TALES)

MIXX Award Europe 2021

- “Non-Profit Corporate Social Responsibility” Category – Silver Award – EŞİT MASALLAR (FAIR TALES)



ANNEX 1: ACHIEVEMENTS AND AWARDS

Odeabank's initiatives continued to earn recognition across various areas in 2023.

**2022****Şikayetvar.com A.C.E Awards**

- Banking B Segment Diamond Award

The Stevie Awards

- Contact Center of the Year (Up to 100 Seats) – Financial Service Industries Gold Stevie Award

IDC Türkiye Financial Technologies Awards

- 1st Prize for Redhat Openshift End-to-End Automation
- 3rd Prize for Transition to SD-WAN Technology

Direklerarası Audience Awards

- Institutional Theaters Award – EŞİT MASALLAR (FAIR TALES)

Yeni Tiyatro Magazine Labor and Achievement Awards

- Best Children's Play of the Year Award – EŞİT MASALLAR (FAIR TALES)

Kristal Elma (Crystal Apple) Awards

- Bronze Award for the commercial film showcasing our instant account opening feature

2023**Odea Mobile Application**

- Red Dot Design Award 2023
- A'Design Award & Competition: Bronze A' Design Award Winner for Mobile Technologies, Applications and Software Design Category in 2022

- Fortune Türkiye 2022 C-Suite Series 50 CTO: Sinan Erdem Özer, Assistant General Manager of Technology and Operations at Odeabank

- Capital Women-Friendly Companies Survey "100 Women Manager-Friendly Companies": Odeabank – 50th place
- The Stevie® Awards: Customer Service Complaints Team of the Year –Financial Service Industries Bronze Award
- Şikayetvar A.C.E Awards: Banking B Segment - Diamond Award
- IMI Conferences – "Most Praiseworthy" Award in the "Best Team Leader" Category at the Türkiye Call Center Awards
- PSM Awards – Silver Award for Internal Innovation with the Customer Service Assistant Bot "Odi"
- Brandon Hall Group Excellence Awards: Talent Management - Talent Acquisition – Leadership Development/Human Resources



**ANNEX 2: ENVIRONMENTAL PERFORMANCE INDICATORS**

Electricity Consumption (kWh)	2021	2022	2023
Renewable Energy (I-REC)	3,275,076	4,146,656	4,058,249
Excluding I-REC	2,848,252	495,540	455,443
Total	6,123,328	5,717,852	4,513,692

Natural Gas Consumption (m³)	2021	2022	2023
Natural gas	256,591	294,077	280,000

Emissions (tCO ₂ e)	2021	2022	2023
Scope 1	1,022	1,286	1,444
Scope 2	1,361	237	218
Scope 3	-	299	297
Total	3,986	2,336	1,941

Water Management (m³)	2021	2022	2023
Municipal Water Consumption	11,550	8,791	12,736

Non-Hazardous Waste (kg)	2021	2022	2023
Domestic Waste	12,000	8,281	12,450
Paper and cardboard	1,059	1,342	4,913
Total Non-Hazardous Waste	13,059	9,623	17,363

Hazardous Waste (kg)	2021	2022	2023
Battery	-	540	288
Toner Cartridges	8,330	6,047	1,179
Medical Waste	60	50	50
Total Hazardous Waste	8,390	6,637	1,517

**ANNEX 3: SOCIAL PERFORMANCE INDICATORS**

Employee Satisfaction and Loyalty	2023
Number of employees participating - Satisfaction	1,090
Ratio of employees participating - Satisfaction	85%
Weighted Satisfaction Score	73
Number of employees participating - Loyalty	1,090
Ratio of employees participating - Loyalty	85%
Weighted Loyalty Score	56

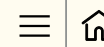
Employees by Gender	2021	2022	2023
Female	635	637	749
Male	476	473	535
Total	1,111	1,110	1,284

Total Number of Disabled Employees	2021	2022	2023
Female	9	9	8
Male	17	15	15
Total	26	24	23

Total Number of Employees by Age Groups	2021			2022			2023		
	Female	Male	Total	Female	Male	Total	Female	Male	Total
Under 30	116	67	183	129	82	211	201	138	339
Between 30-50	502	373	875	482	356	838	526	363	889
Over 50	17	36	53	26	35	61	22	34	56

Employees by Seniority in 2023	Female	Male
0-5 years of employment	461	338
5-10 years of employment	173	111
Over 10 years of employment	86	201

2023 New Hiring and Promotions	Female	Male
New hiring	256	185
Promotion	111	74



ANNEX 3: SOCIAL PERFORMANCE INDICATORS

Open Positions	2023
All open positions	602
Positions filled by women	313
Positions filled by men	246
Positions filled by female internal candidates	57
Positions filled by male internal candidates	61
Positions filled by internal candidates	118

2023 Employee Turnover Rate	Female	Male	Total
Number of employees leaving	152	126	278
Employee turnover rate	0.20	0.24	0.22
Number of employees who left voluntarily	101	81	182
Voluntary employee turnover rate	0.13	0.15	0.14

2023 Management Structure	Female	Male	Total
Non-executive*	667	454	1121
Middle Management Structure	80	69	149
Senior Management Structure	2	12	14

*Including first-line managers.

2023 Odeabank Board Structure	Female	Male	Total
Board of Directors	3	9	12
Audit Committee	1	2	3
Executive Committee	2	11	13

Employees by Position in 2023	Female	Male	Total
Income generating functions	291	195	486
Working in technology functions	66	99	165

Employee Training	2021	2022	2023
Total training hours	20,145	24,623	38,085
Average training hours per employee	18.68	20.80	29.66
Leadership training hours	30.5	170	174

2023 Parental leave	Female	Male	Total
Employees taking parental leave	14	14	28
Employees returning to work after parental leave	14	14	28
Employees returning to work after parental leave and having worked for at least 12 months	11	12	23

OHS Training	2021	2022	2023
Number of employees participating	1659	350	714
Total training hours	13,272	2,800	2,293

Occupational Health and Safety	2021	2022	2023
Accident Frequency Rate	0	0	0.23
Number of fatal cases	0	0	0
Number of lost time accidents	0	1	1
Total number of accidents	0	1	1



ANNEX 4: GRI CONTENT INDEX

Statement of use	Odeabank has reported in accordance with the GRI Standards for the period January-December 2023.	
GRI 1 used	GRI 1: Foundation 2021	
GRI Standard	Disclosure	Page Number, Source and/or Direct Answers
General Disclosures		
GRI 2: General Disclosures 2021	2-1 Organizational details	7 13
	2-2 Entities included in the organization's sustainability reporting	7
	2-3 Reporting period, frequency and contact point	7
	2-4 Restatements of information	13
	2-5 External Assurance	No external audit was conducted within the scope of the report. 16
	2-6 Activities, value chain and other business relationships	17 19-20 34
	2-7 Employees	52-59
	2-8 Workers who are not employees	All Odeabank employees are its own personnel.
	2-9 Governance structure	31-32 26-27

GRI Standard	Disclosure	Page Number, Source and/or Direct Answers
GRI 2: General Disclosures 2021	2-10 Nomination and selection of the highest governance body	Privacy Restrictions Odeabank, does not share this information publicly in accordance with the institution's privacy policies.
	2-11 Chair of the highest governance body	31-32
	2-12 Role of the highest governance body in overseeing the management of impacts	26-27 31
	2-13 Delegation of responsibility for managing impacts	26-27 45-47
	2-14 Role of the highest governance body in sustainability reporting	26-27
	2-15 Conflicts of interest	30 33
	2-16 Communication of critical concerns	No critical issue occurred during Odeabank's reporting period.
	2-17 Collective knowledge of the highest governance body	31-32
	2-18 Evaluation of the performance of the highest governance body	Privacy Restrictions Odeabank, does not share this information publicly in accordance with the institution's privacy policies.
	2-19 Remuneration policies	28-29



ANNEX 4: GRI CONTENT INDEX

GRI Standard	Disclosure	Page Number, Source and/or Direct Answers
GRI 2: General Disclosures 2021	2-20 Process to determine remuneration	28-29
	2-21 Annual total compensation ratio	Privacy Restrictions Odeabank does not share this information publicly in accordance with the institution's privacy policies.
	2-22 Statement on sustainable development strategy	21-23
	2-23 Policy commitments	28-30
	2-24 Embedding policy commitments	28-30
	2-25 Processes to remediate negative impacts	33 45-47 48-50 42
	2-26 Mechanisms for seeking advice and raising concerns	30-32 42
	2-27 Compliance with laws and regulations	30-32
	2-28 Membership associations	34
	2-29 Approach to stakeholder engagement	34
	2-30 Collective bargaining agreements	Odeabank does not have a workforce under a collective agreement.

GRI Standard	Disclosure	Page Number, Source and/or Direct Answers
Material Topics		
GRI 3: Material Topics 2021	3-1 Process to determine material topics	24-25
	3-2 List of material topics	24-25
	3-3 Management of material topics	24-25
Economic Performance		
GRI 3: Material Topics 2021	3-3 Management of material topics	13
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	16 61-63
Indirect Economic Impacts		
GRI 3: Material Topics 2021	3-3 Management of material topics	38-47
GRI 203: Indirect Economic Impacts 2016	203-2 Significant indirect economic impacts	45-47 38-41
Procurement Practices		
GRI 3: Material Topics 2021	3-3 Management of material topics	34
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	34



ANNEX 4: GRI CONTENT INDEX

GRI Standard	Disclosure	Page Number, Source and/or Direct Answers
Anti-corruption		
GRI 3: Material Topics 2021	3-3 Management of material topics	30
GRI 205: Anti-Corruption 2016	205-1 Operations assessed for risks related to corruption	30
	205-2 Communication and training about anti-corruption policies and procedures	30
	205-3 Confirmed incidents of corruption and actions taken	30
Anti-competitive Behavior		
GRI 3: Material Topics 2021	3-3 Management of material topics	30
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	There are no lawsuits regarding anti-competitive behavior and activities.
Energy		
GRI 3: Material Topics 2021	3-3 Management of material topics	48-49
GRI 302: Energy 2016	302-1 Energy consumption within the organization	49, 66
	302-4 Reduction of energy consumption	48-49

GRI Standard	Disclosure	Page Number, Source and/or Direct Answers
Water and Effluents		
GRI 3: Material Topics 2021	3-3 Management of material topics	50
GRI 303: Water and Wastewater 2018	303-1 Interactions with water as a shared resource	50
	303-3 Water withdrawal	50, 66
Emissions		
GRI 3: Material Topics 2021	3-3 Management of material topics	48-50
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	49-50, 66
	305-2 Energy indirect (Scope 2) GHG emissions	49-50, 66
	305-3 Other indirect (Scope 3) GHG emissions	49-50, 66
	305-5 Reduction of GHG emissions	49-50, 66
Waste		
GRI 3: Material Topics 2021	3-3 Management of material topics	50
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	50
	306-2 Management of significant waste-related impacts	50
	306-3 Waste generated	50, 66
	306-5 Waste directed to disposal	66



ANNEX 4: GRI CONTENT INDEX

GRI Standard	Disclosure	Page Number, Source and/or Direct Answers
Employment		
GRI 3: Material Topics 2021	3-3 Management of material topics	51-57
GRI 401: Employment (2016)	401-1 New employee hires and employee turnover	56
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	29, 51-57
	401-3 Parental leave	68
Occupational Health and Safety		
GRI 3: Material Topics 2021	3-3 Management of material topics	60
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	60
	403-2 Hazard identification, risk assessment, and incident investigation	60
	403-5 Worker training on occupational health and safety	60, 68
	403-8 Workers covered by an occupational health and safety management system	60
	403-9 Work-related injuries	68
	403-10 Work-related ill health	68

GRI Standard	Disclosure	Page Number, Source and/or Direct Answers
Training and Education		
GRI 3: Material Topics 2021	3-3 Management of material topics	58-59
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	58, 68
	404-2 Programs for upgrading employee skills and transition assistance programs	58-59
Diversity and Equal Opportunity		
GRI 3: Material Topics 2021	3-3 Management of material topics	51-55
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	55, 68
Local Communities		
GRI 3: Material Topics 2021	3-3 Management of material topics	61-63
GRI 413: Local Communities 2016	413-2 Operations with significant actual and potential negative impacts on local communities	61-63
Customer Privacy		
GRI 3: Material Topics 2021	3-3 Management of material topics	37, 42
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	37, 42



ANNEX 4: GRI CONTENT INDEX

GRI Standard	Disclosure	Page Number, Source and/or Direct Answers
Financing the Low-Carbon Economy		
GRI 3: Material Topics 2021	3-3 Management of material topics	44-47
Cybersecurity and Data Protection		
GRI 3: Material Topics 2021	3-3 Management of material topics	41
Digital Transformation		
GRI 3: Material Topics 2021	3-3 Management of material topics	40-41
Responsible Products and Services		
GRI 3: Material Topics 2021	3-3 Management of material topics	47
Customer Experience		
GRI 3: Material Topics 2021	3-3 Management of material topics	4

ANNEX 5: WOMEN'S EMPOWERMENT PRINCIPLES (WEPs)
COMMUNICATION ON PROGRESS

WEPs	GRI STANDARDS DISCLOSURES	PAGE REFERENCES
Principle 1: Create High-Level Corporate Leadership for Gender Equality	GRI 405-1, GRI 405-2	51-57
Principle 2: Treat All People Fairly at Work, Respecting and Supporting Non-Discrimination and Human Rights	GRI 202-1; GRI 401 -1; GRI 401 -3; GRI 405-1, GRI 405-2; GRI 406-1	51-57
Principle 3: Ensure the Health, Wellbeing and Safety of All Workers, Whether Male or Female	GRI 403-2; GRI 406-1	51-57, 60
Principle 4: Promote Education, Training and Professional Development for Women	GRI 404-1; GRI 404-3	51-59
Principle 5: Implement Supply Chain, Marketing Practices and Enterprise Development that Empower Women	GRI 3-3; GRI 204-1	34
Principle 6: Champion Equality Through Community Initiatives and Advocacy	GRI 413-1	61-63
Principle 7: Measure and Report Publicly on Progress to Create Gender Equality	GRI 3-3; GRI 405-1; GRI 405-2	51-57

odeabank

Esentepe Mahallesi Büyükdere Caddesi
Levent 199 Apt. No: 199/119
Şişli/İSTANBUL/TÜRKİYE
+90 212 304 84 44
+90 212 304 84 45
www.odeabank.com.tr
iletisim@odeabank.com.tr

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