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2021

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2021

SUSTAINABILITY REPORT

odeabank

AS TÜRKİYE’S YOUNG AND DYNAMIC BANK, WE INTRODUCE OUR CUSTOMERS TO A SPECIAL BANKING APPROACH AND OFFER MORE THAN IT SEEMS WITH OUR INNOVATIVE AND PERSONAL BANKING STRATEGY. WE ARE PROUD OF BEING THE YOUNGEST PRIVATE DEPOSIT BANK AMONG TÜRKİYE’S MOST VALUABLE AND STRONG BRANDS LIST OF BRAND FINANCE, THE INDEPENDENT BRAND ASSESSMENT INSTITUTION.

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ABOUT THE REPORT

Odeabank, a dynamic member of the Turkish banking sector, celebrated its 8th year in Türkiye in 2020.

While working for “equal futures” by considering the needs of future generations, Odeabank acts with great care to protect the resources of our planet and strives to achieve “more than it seems” in its sustainability journey. With this mentality, it aims to meet the financing needs and expectations of its customers in the fastest and most reliable way, while committing to creating long-term value for all segments of society in all banking transactions, protecting the environment and the rights of its employees. It assumes active responsibility not only for its direct impact, but also for eliminating or minimizing the negative environmental and social impacts that may arise due to lending activities.

With its dynamic and innovative structure, Odeabank has accelerated its sustainability efforts with the awareness of the key role the finance sector plays in the success of sustainable development. As a result of these efforts, it is pleased to share its non-financial performance with this first sustainability report prepared with the financial support of Green for Growth Fund (GGF) Technical Assistance Facility, and in line with

the GRI Standards - the sustainability reporting standards issued by the Global Reporting Initiative (GRI). The Odeabank 2021 Sustainability Report, which includes the activities carried out by Odeabank to support sustainable development, is based on the January-December 2021 period and is shared on the website <https://www.odeabank.com.tr/>.

Designing the roadmap after determining its sustainability priorities, setting future targets and updating the sustainability report transparently at periodic intervals are all indicators of the importance Odeabank places on sustainability.

All opinions and suggestions of its stakeholders are of utmost value for Odeabank. For your comments and questions regarding the sustainability efforts undertaken by Odeabank, please contact us at: cevreselvesosyalrisk@odeabank.com.tr

**THERE'S A WORLD
THERE'S NOTHING LIKE A BETTER FUTURE**



CHAIRMAN’S MESSAGE

Esteemed stakeholders,

We are proud of being one of the top 10 banks in Türkiye in terms of asset size, on the journey we embarked on by starting our operations in the Turkey’s finance sector in 2012. In a short period of 10 years, thanks to our customer-oriented approach and the value we place on our human capital, we have succeeded in becoming a bank that develops innovative and fast solutions in commercial and retail banking, is trusted by its customers, and makes a difference in its field.

The climate crisis that our planet is facing and the COVID-19 pandemic that emerged in 2019 affected our lives in social and environmental aspects and increased our awareness. With this awareness, as Odeabank, we have accelerated our sustainability efforts while maintaining our successful financial performance by courtesy of our strong capital structure and high liquidity. We are happy to contribute to the United Nations Sustainable Development Goals and to support the

sustainable development of our country through these efforts. At the same time, we act with the sustainability principles we have stated in the “Sustainability Policy” and the fair and transparent corporate governance approach we adopt, and determine our strategic goals in line with corporate governance principles.

Considering the extent that environmental and social problems have reached, we are aware that it is very critical to have a holistic perspective and to evaluate the effects along the entire value chain in order to offer solution-oriented approaches. As Odeabank, in addition to our direct impact on the environment, we also consider the environmental and social impacts that may arise due to the activities for which we offer loans. In this context, we do not provide financing for any activity that is included in the “Odeabank List of Prohibited Activities” in the annex to the “Environmental and Social Policy”, which we have developed based on

the list of prohibited activities determined by the International Finance Corporation (IFC).

The Sustainability Policy we published in 2022 and the 2021 Sustainability Report clearly reveal the priorities of all our stakeholders and how much we care about sustainability practices. I would like to thank you, our esteemed stakeholders, for taking the time to review our non-financial performance,

which we are sharing with this first sustainability report.

Sincerely,

DR. IMAD ITANI
Bank Audi S.A.L. Member of the Board and Odeabank Chairman of the Board



MESSAGE FROM THE CEO

Dear stakeholders ,

As Odeabank, since the day we were founded, we have acted with the vision of “being Turkey’s leading ‘phygital’ bank, offering the best digital experience integrated with authentic physical services” and we respond to the needs of our customers at the highest level with our service network spread across 16 provinces. In our activities, which we carry out with the aim of implementing projects that create value and make a difference for everyone, we are happy to have undertaken efforts that produce positive impact by focusing on the issue of sustainability, and to share the important steps in this process with you in our first sustainability report. Thanks to the advantages that accompany being a young and dynamic member of the Turkish banking sector, we present to you the rapid actions we have taken and the current work we carry out under the umbrella of sustainability.

As Odeabank, we believe that a sustainability approach that creates value for the world of finance and the society and the environment we live in is an inseparable whole. In order to be an economically sustainable institution, we adopt an effective risk management approach in all of our activities, as in the global COVID-19 pandemic. In this context, we ensure that risks and opportunities are balanced in line with our short, medium and long-term goals and strategies.

We believe that banks have critical roles in mobilizing the necessary financial resources for sustainability implementations. In addition to our own activities, we include all corporate/

commercial and SME loans we have allocated in the environmental and social risk assessment process, without any limits in terms of amount. We are confident about the future with our care for environmental issues, our qualified workforce, the innovative solutions we have developed, our strong capital structure and the value we create for our customers, the children and the whole society.

The extreme weather, floods, forest fires and disrupted habitats we have witnessed in the recent years, especially in our country, remind us that we need to take action as soon as possible to reduce the effects of the global climate crisis. As Odeabank, both in our own operations and in the activities we support through financing, we consider the environmental, social and economic dimensions of sustainability with a holistic approach. We do not see sustainability as merely minimizing the negative effects of climate change and protecting the environment. In this context, we are working on reducing greenhouse gas emissions from energy consumption and implement projects to ensure energy efficiency. With the “Energy Management Platform” that we have launched in 2016, we can instantly monitor the energy consumption of our branches, carry out improvement activities and save significant amounts of energy. Since the commissioning of the platform, we have prevented 924 tons of carbon emissions through the energy savings we have achieved. In addition, we reduce the amount of non-hazardous waste, mainly paper, as well as hazardous waste such as medical waste with each passing year.

In the social context, we focus on the value we place on our employees and the positive impact

we create for them.

Along with our experienced and development-oriented human resource, we see diversity within the organization as one of our privileged values. We are working to increase women’s participation in the working life through our gender equality targets

that we are planning to implement. As of 2021, as a bank that complies with the principles of empowering women and develops projects in this direction, our female employee ratio is 57%, while the ratio of female executives at the Board of Directors level is 33%. In parallel with the value we place on equality, we act with the awareness that the participation of women in the workforce is an important step that will accelerate sustainable development. The fact that we are a signatory to the Women’s Empowerment Principles (WEPs), the global private sector initiative of the United Nations aimed at women’s participation in working life on equal terms, proves that we embrace the principles of equality and inclusiveness.

We consider it our primary responsibility to provide a fair and safe working environment for our employees, to create value for the entire society and to prepare for an “equal tomorrow” starting from today. With the “Fair Tales” project, which clearly demonstrates the importance we place to this issue and is at the forefront of our social responsibility activities, we reinterpreted world



classic fairy tales from an egalitarian perspective and succeeded in raising awareness of gender equality in society to a large extent. Through “Fair Tales” project that we delivered the books to approximately 50,000 children in 348 schools, 81 of which were village schools, we received many awards.

As Odeabank, we strive to go beyond functioning as a financial institution, and to achieve “more than it seems”. We have launched the O’Art, O’Mag and O’Blog platforms so that everyone can catch up with the trends in culture, art, life, fashion, travel, business world, architecture and technology, and to raise awareness on social issues and increase the accessibility of art. With these platforms, we not only strengthen our relations with everyone, whether our customers or not, but also have the opportunity to understand the changing expectations of the society from day to day and to develop products and services in this direction.

I would like to thank all of our stakeholders, especially our employees, for their contributions to this first sustainability report, in which we transparently present the steps we have taken in the journey of building a sustainable future.

Sincerely,

MERT ÖNCÜ, PhD
CEO and Board Member



01

There's a world where
there's
no discrimination

ABOUT ODEABANK

Corporate Profile

History

Capital and Shareholding Structure

Operating Regions (Branches)

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Products and Services

Achievements and Awards

CORPORATE PROFILE

Odeabank is the Turkish subsidiary of Bank Audi Group, Lebanon’s leading financial institution operating in 11 different countries.



Bank Audi is a regional banking group headquartered in Lebanon, operating in all corporate, commercial, retail, investment and private banking segments.

48

Branches

1,111

Employees

55,5

Billion TL Asset Size

Founded as a joint stock company on March 15, 2012, Odeabank started its activities on October 2, 2012, with the decision of the Banking Regulation and Supervision Agency. Although it entered the Turkish banking sector as the 49th bank in 2012, it managed to increase its asset size 11 times in as little as four years and became one of the top 10 private deposit banks in Türkiye in asset size ranking, according to The Banks Association of Türkiye.

When Odeabank was founded in 2012, it became the first bank in the Turkish banking sector to obtain a license from scratch after

15 years. Odeabank, which has become the most dynamic, innovative and competitive player of the Turkish banking sector with an asset size of TL 55.5 billion in the last 9 years as of the end of 2021, is ready to embrace the future with confidence through its high liquidity and strong capital structure. It continues to contribute to the Turkish economy, with the rightful pride of achieving a gross loan amount of TL 27.6 billion and a net income of TL 206 million with an increase of 53%.

Operating in commercial and retail banking, Odeabank has 48 branches and 1,111

employees as of the end of 2021. As in the past 10 years, it will continue to strengthen its value and position in the sector, thus contributing to the country’s economy by preserving its strong capital structure and experienced and talented workforce in the future. With its customer-oriented approach, it will continue to develop and improve its digital banking channels, which ensure that its customers’ needs are met uninterruptedly and quickly.

Putting customer satisfaction at the center of all of its activities, Odeabank has formed its working strategy in line with the principles that will carry its customers, shareholders and Türkiye forward. It aims to strengthen its position in the sector by maintaining its strong capital structure and expert human resources in the future.

The vision of the bank, which determines its raison d’être (reason for being) as increasing welfare with value-creating banking services, is “to become Turkey’s leading ‘phygital’ bank, offering the best digital experience integrated with authentic physical services”.

Adopting the motto of “More than it seems”, Odeabank has been putting forward projects that create value and make a difference for everyone, beyond what meets the eye, since the day it was founded. Odeabank, one of Turkey’s young, dynamic and innovative banks, will continue to develop its business model and create value for all its stakeholders.



HISTORY

The important developments and milestones that have taken place since Odeabank was established in 2012 are:

2012

Operating license is obtained from the Banking Regulation and Supervision of Agency (BRSA) in October 2012, and Odeabank's first branch opened in Maslak.

2014

Odeabank releases its Oksijen Hesap product.
The Bank is integrated with the Micro Accounting Program.
ATM'den Çek Kabul (ATM Check Acceptance) project is initiated.

2016

A capital increase of TL 1 billion is realized in the Bank.

2018

Odeabank becomes one of the top 10 banks in terms of asset size among private deposit banks.

2013

Odeabank received "Türkiye's Most Innovative Bank" and "Türkiye's Best New Bank" awards, given by Global Banking Finance review.

2015

O'Art, Odeabank's art platform is established.

2017

Integrated Finance and Risk Systems (IFRM), which started to be developed in 2016, is put into pilot use as of the end of 2017, after the implementation and testing phases are successfully completed.

2019

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

2020

The Eşit Masallar (Fair Tales) social responsibility project is implemented.

The FAST System ("Instant and Continuous Transfer of Funds") operated by the Central Bank of the Republic of Türkiye was activated.

2021

The Eşit Masallar (Fair Tales) project is staged as a theatrical play.

Odeabank sponsors free diving world record holder national diver Şahika Ercümen with Oksijen Hesap. Şahika Ercümen, with the main sponsorship of Oksijen Hesap and on the occasion of 98th anniversary of the Republic, dives 100 meters without swimfins or a tube, breaking the world record.

Odeabank's gross loans reach TL 27.6 billion and its net income increases by 53% to TL 206 million.

The Yakından Bankacılık Era begins at Odeabank, where all services are provided by financial advisors over the phone.

Odeabank signs a cooperation agreement with Tacirler Investment in order to offer its customers stock and VIOP transactions and investment services more effectively.

Odeabank is included in the list of Türkiye's Most Valuable and Powerful Brands by Brand Finance.

Closely following the developments regarding the COVID-19 outbreak, Odeabank provides TL 1 million worth of support to the Republic of Türkiye Ministry of Family, Labor and Social Services.

Odeabank signs the United Nations Women's Empowerment Principles, a private sector initiative aimed at women's equal participation in economic life and their empowerment.

CAPITAL AND SHAREHOLDING STRUCTURE

The shareholder base of Bank Audi Group, which has approximately 6,200 employees, includes approximately 1,500 shareholders and/or Global Depositary Certificate holders.

Odeabank’s main shareholder is Bank Audi Group, headquartered in Lebanon, which has a universal banking profile, mainly offering commercial and corporate banking, retail and private banking as well as capital market activities and factoring. Bank Audi dates back to 1830 and its shareholder base has been expanding since 1983. Launched in Beirut, it continues to operate in Abu Dhabi (with a representative office), Qatar, Saudi Arabia and Türkiye, in addition to operations in France,

Switzerland and Lebanon. As of the end of March 2022, Bank Audi’s consolidated assets amount to USD 26.7 billion, customer deposits to USD 19.8 billion, and equity to USD 2.5 billion. With 3,128 employees as of March 2022, the shareholder base of Bank Audi and its consolidated subsidiaries includes more than 1,500 stock and/or Global Depositary Receipt holders. The Bank’s shares are listed on the Beirut Stock Exchange.

SHAREHOLDERS	NUMBER OF SHARES	SHARE OWNERSHIP RATIO
Bank Audi SAL	2,513,293,000.00	76.42%
European Bank for Reconstruction and Development	263,394,000.00	8.01%
International Finance Corporation	209,251,900.00	6.36%
H.H Sheikh Dheyab Binzayed Binsultan Al-Nahyan	131,697,000.00	4.00%
IFC FIG Investment Company S.a.r.l	112,674,100.00	3.43%
Mohammad Hassan Zeidan	58,532,000.00	1.78%
TOTAL	3,288,842,000.00	100.00%

As of 2021,
the Bank’s customer
deposits reached
\$19.8 billion
and its equity reached
\$2,5 billion

OPERATING REGIONS (BRANCHES)

In addition to Odeabank's 48 branches serving in the provinces of Adana, Ankara, Antalya, Bursa, Denizli, Eskişehir, Gaziantep, Hatay, Istanbul, İzmir, Kayseri, Kocaeli, Konya, Mersin, Muğla and Samsun, it has 48 branches in total, including the BankO Branch in Istanbul, which only performs the central management of remotely acquired customers.



48
branches



Odeabank’s vision, mission and values, in other words, its cultural codes, were reconstructed based on the research outputs of the Employer Branding project, which started throughout the Bank in 2020 and continued in 2021.

VISION

Our vision is to become Turkey’s leading “phygital” bank, offering the best digital experience integrated with authentic physical services.

MISSION

Our mission is to facilitate banking with our unique products and expertise, and to contribute to sustainable development with an awareness of social responsibility.

VALUES

Authenticity

We understand our stakeholders and make their lives easier.
We think creatively and offer fast and practical solutions.
We differentiate by making a personal impact..

Excitement

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

Openness

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

Respect

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



Odeabank aims to be a bank that can accurately identify the needs of its customers, improve their quality of life, make them feel special and become essential for them.

Odeabank aims to be a bank which every employee will be proud to be a part of, where they feel that they are appreciated, treated fairly, can enrich themselves, and meet their career goals.

Odeabank aims to be a bank that responds to the needs of the society in which it operates, is aware of its corporate citizenship duties, and works to enhance society’s welfare.

Odeabank aims to be a dynamic and innovative bank in the sector with its technological infrastructure, efficient service approach and experienced human resources.

PRODUCTS AND SERVICES

With its customer-oriented approach, Odeabank offers products and services to meet the needs of individuals and commercial institutions. It cares about developing long-term sustainable and reliable relationships with its customers.

Commercial Banking

In 2021, while the impact of the global COVID-19 pandemic continued, Odeabank resumed to support the commercial activities of companies and provided financial resources to its customers to meet their needs. The scope of Commercial Banking, which provides services to its customers at 18 points, including 5 Commercial Centers and 13 Commercial Branches in 13 provinces as of 2021, consists of cash loans, foreign

trade financing, letters of guarantee, insurance, cash management solutions and treasury products.

Odeabank continues its efforts to make its services a pioneer in the banking sector by creating sustainable success and high-quality brand image through its Commercial Banking activities.

Foreign Trade and Cash Management Hotline

The Foreign Trade and Cash Management Hotline is designed for companies that have just started their foreign trade activities or are currently exporting to foreign markets or purchasing goods/services from foreign markets and need support for their transaction cycles, financing and guarantee needs. Through this hotline, which was launched in March 2021, the questions of companies that need support in foreign trade are answered and technical consultancy is provided. In addition to foreign trade transactions, support is provided for the cash management needs of companies, as well as for Odeabank customers, and anyone in need of technical support.

Customer meetings called "Foreign Trade Meetings with Gizem Öztok Altınsaç", which started before COVID-19, continued on online platforms during the pandemic. In these meetings, where macroeconomic indicators in Türkiye and in the world are detailed, information is shared on the subjects for which companies need support. 4,000 participants have been reached so far



in 100 meetings organized by bringing together businesspeople and the Chambers of Industry and Commerce, contributing to the financial management of companies.



Retail and Private Banking

As of 2021, Odeabank Retail and Private Banking operates in 48 branches, including the Bank'O Branch, in 16 provinces. It develops products and services focusing

on customers' needs and expectations and has been continuing its expertise in remote customer acquisition and management since its establishment.

Deposit Products

Odeabank offers many product alternatives to its customers who want to invest in their savings with fixed or variable return alternatives. In addition to the monthly time deposit product, Oksijen Hesap, which can be opened in TL, USD and EUR currencies and provides overnight interest, is offered with a lower demand limit to savings holders for their daily cash usage needs. Functioning as time deposit during the day and demand deposit during the night, and eliminating the concern of maturity spoil, the Oksijen Hesap is preferred by customers who want to invest in their savings on a daily basis.

Odeabank diversified its deposit portfolio by developing many alternative products and services for its customers who want to invest in their savings for the medium and long term and protect their savings from risks. In this context, along with demand and time deposit products, it offers alternative deposit products to its customers, which respond to daily cash usage needs with a lower limit of demand, offer the flexibility to withdraw money before maturity, generate interest income while freely



switching between currencies, provide the opportunity to invest in savings as gold or silver and to invest in savings for medium and long term, protect against fluctuations in exchange rates, and remove currency risk at maturity.

Insurance and Private Pension

Through its collaboration with AXA Sigorta A.Ş., MetLife Emeklilik ve Hayat A.Ş. and HDI Sigorta A.Ş., Odeabank carries out product and service development activities in the field of bancassurance.



Investment Products

With its experienced staff, Odeabank embraces an investment management approach, while offering products and services to protect and increase its customers' savings in line with risk appetite and return expectations. The 5 key elements of this approach are:

- To know the customer well,
- To protect the customer from possible risks according to the risk level defined by the customer,
- To offer the most diverse and innovative investment opportunities on the market,
- To carry out the management with an experienced and professional and investment certified team of experts,
- To create an investment strategy in a planned process independent of possible risks.

Odeabank customers can get the most suitable product and service support for them through one-to-one meetings with the branch staff who are experts in their fields, experienced and certified by Capital Markets Board of Türkiye (CMB).

Odeabank's portfolio of investment products includes sustainability fund basket funds and sustainability stock funds.



Debit Cards and Credit Cards / Personal Loans

The basic approach of bank and credit card products developed by Odeabank is to produce easy and quickly accessible solutions to meet the needs of customers. In this context, Ayrıcalıklı Kart (Privileged Card), which offers cash back for the first time in the banking sector, was offered to high-income segment customers, and Private Card to private banking customers. In 2021, as part of the efforts to enhance customer experience in terms of credit cards, all credit cards started to be printed contactless, and installment features were expanded.

In addition, Odeabank offers its customers suitable financial consultancy and payment plans in line with their cash needs and provides individual loans.



ACHIEVEMENTS AND AWARDS

As Odeabank, we have received nearly 200 different awards in 9 years, for many different themes such as our products and diversity, our banking services, our digital services, and our understanding of customers. The awards we have received in the last 3 years are as follows:

2019

- **IMI Conferences –Call Center Awards Türkiye**
 - First Prize in the category of Best Call Center with under 100 Seats
 - “Most Praiseworthy Customer Representative” Award to Yeşim Bazu in the Best Customer Representative category
- **CX Awards – Customer Experience Awards**
 - “Best Idea” Award for the “Chatbot & Attached Data” project in the Best Use of Artificial Intelligence category
- **17th Golden Spider Awards**
 - Best Website – Second Prize in Banking and Finance category



2020

- **ARC Awards for Annual Reports**
 - Odeabank 2019 Annual Report Interior Design Gold Award - Banks category (International)
 - Odeabank 2019 Annual Report Cover Photo/Design Gold Award - Banks category (International)
 - Odeabank 2019 Annual Report Traditional Annual Report Silver Award - Banks category (International)
 - Odeabank 2019 Annual Report Printing and Production Honors - Banks category (International)
- **Stevie Awards Bronze Awards**
 - “Oksi Bot” Chat Bot project - Bronze Award in Financial Service category
- **Standard Chartered Bank “Customer Reward Program” Awards**
 - Outstanding Quality in Payments Formatting Award

2021

- **IDC**
 - “Webex- Cloud Collaboration” Third Prize in the Cloud Transition category
- **Global Banking & Finance Review Awards 2021**
 - Fastest Growing Private Banking Award
- **A.C.E Award**
 - Banking Segment B Gold Award
- **Standard Chartered Bank Awards**
 - Outstanding Quality in Payments Formatting Award for excellence in FC transfer transactions
- **PRIDA Communication Awards**
 - Strategic Communications Section, Corporate Social Responsibility Communication-EŞİT MASALLAR (Fair Tales)
 - Gender Equality in Communication Special Award – EŞİT MASALLAR (Fair Tales)
 - Special Awards: Ezber Bozan (Out of the Box) 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-Oriented Press and Broadcasting” Category - EŞİT MASALLAR (Fair Tales)
 - PR Section, Felis 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 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 Award
- **MIXX Award Europe 2021**
 - Silver Award in the “Non-Profit Corporate Social Responsibility” Category – EŞİT MASALLAR (Fair Tales)





CORPORATE GOVERNANCE

Corporate Governance

Principles and Policies

Code of Ethics

Organizational Structure and
Executive Board Members

Committees

Internal Systems, Legislation and
Compliance

Risk Management Approach

CORPORATE GOVERNANCE PRINCIPLES AND POLICIES



Odeabank has been publishing a "Corporate Governance Principles Compliance Report" on its corporate website since 2017 in order to demonstrate its determination to maintain Corporate Governance practices within the Bank and to continuously develop and improve these principles.

Odeabank carries out its activities within the framework of certain rules. Care is taken to ensure that the determined rules comply with good institutional practices, and that they consist of rule sets that are independent of individuals and based on equality. All employees are expected to abide by and adopt these rules.

Sustainability Policy

Being aware of the extraordinary impact that the financial sector can have in creating a more sustainable world for future generations, Odeabank prioritizes sustainable development in its operations. In this context, the Bank aims to contribute to the development and sustainable growth of our country in all its banking transactions and operations as well as to encourage the spread of such activities. With the responsible business approach, the Bank aims to eliminate or minimize the negative

environmental and social impacts that may arise from its lending activities and own operations, by taking the United Nations Sustainable Development Goals (SDGs) and the good practices of other supranational organizations operating internationally. With this Policy, in order to support sustainable development, the Bank defines and determines the general principles, basic management and control objectives and principles to be followed.

Corporate Governance Policy

The "Corporate Governance Principles" that Odeabank must comply with in accordance with the BRSA regulation are specified in the Odeabank Corporate Governance Policy. The principles that Odeabank undertakes to comply with are:

1

Institutional values and strategic goals should be established within the Bank.

2

Authorities and responsibilities within the Bank should be clearly defined and implemented.

3

Members of the Board must possess the qualifications required to perform their duties effectively, be aware of the role they have undertaken in corporate governance and be able to make independent assessments about the Bank's activities.

4

Senior Management must have the qualifications to enable them to fulfill their duties effectively and be aware of the role they have undertaken in corporate governance.

5

The work of the Bank's Internal Systems and External Audit employees should be utilized effectively.

6

Compliance with the ethical values, strategic goals and internal balances of the Bank should be ensured in the remuneration policies.

7

Transparency should be ensured in corporate governance.

The policy also states the duties and structure of the Board of Directors, as well as the working purposes, members and responsibilities of the existing committees.

Odeabank publishes its compliance with the principles determined by the BRSA as an annual report on its corporate website.

Remuneration Policy

With the Odeabank Remuneration Policy, it is ensured that the salaries to be paid to the employees match the ethical values and strategic goals of the Bank. It is ensured that the additional payments to be made based on the performance of the employees are consistent with the risks to be assumed by the Bank.

Human Resources Policy

With its Human Resources Policy, Odeabank ensures that its employees carry their business experience to the highest level. This policy is a guide for Odeabank employees on ethics, discipline and compliance with the legislation to which the Bank is subject.

AML Policy

This policy covers the obligations determined by Odeabank to prevent money laundering and financing of terrorism. It aims to minimize the risks through a risk-based approach and the assessment of the transactions made and services received by the Bank and its customers.

Environmental and Social Policy

Odeabank’s Environmental and Social Policy includes the necessary principles and regulations for the detection and prevention of environmental and social impacts that may arise due to the Bank’s lending processes. In this context, the Odeabank List of Prohibited Activities has been prepared with reference to the list of prohibited activities determined by the International Finance Corporation (IFC), and such activities are not financed. In addition, the policy states that in case of non-compliance with any environmental and social laws or regulations during the lending process, lending activities will not be carried out.

Personal Data Protection, Processing, Storage and Disposal Policy

The Personal Data Protection and Processing Policy states the measures taken to protect the personal data of legal and natural persons who have data in Odeabank in any way and for any purpose, to process them in accordance with the law, and to ensure their confidentiality and security.

Precious Metals Responsible Supply Chain

The policy was established based on the provisions of the Regulation on the Operating Principles of Precious Metals Exchange Intermediary Institutions and the Establishment of Precious Metals Intermediary Institutions, and the Communiqué on Precious Metals Standards and Refineries, which are elements of Borsa İstanbul’s precious metals responsible supply chain compliance program. Along with the relevant policy, Odeabank aims to ensure compliance with stock market regulations and international standards, procedures and principles.

Information Technologies (IT) Policy

With the policy, the roles and responsibilities of the IT department within the Bank are determined, the organizational structure is established, and the processes for preparing or changing new policies, procedures or related documents are detailed.

Corporate Social Responsibility Policy

In addition to the fields in which it operates, Odeabank aims to contribute to the society with its corporate social responsibility awareness. It carries out awareness-raising and transformative activities in many spheres, especially in education, sports, culture and arts, environment, women’s empowerment, gender equality and accessibility.

CODE OF ETHICS

Ethical Rules of Conduct are the principles set for increasing the professional and personal obligations and awareness of Odeabank employees.



Odeabank’s core values, along with the highest professional standards of banking, aim to ensure the compliance of employees with all ethical and business rules as parts of the banking sector, in addition to laws, rules and regulations. Odeabank employees have the following responsibilities:

- **To act in accordance with the principle of confidentiality of customer and Bank information,**
- **To keep fair and accurate records,**
- **To perform transactions honestly,**
- **To be consistent in their relationships with others,**
- **To provide complete, accurate and full information,**
- **To not discriminate on religion, language, race, gender, age, marital status and physical appearance,**
- **To provide a working environment free of violence, physical and psychological abuse, alcohol and drugs,**
- **To not obtain personal benefits through their titles or authority.**

Odeabank employees are responsible for the protection, non-leakage and non-sharing of personal data belonging to legal and real persons retained by the Bank, as well as information on the Bank’s strategy, business plans, technologies, employee salaries and

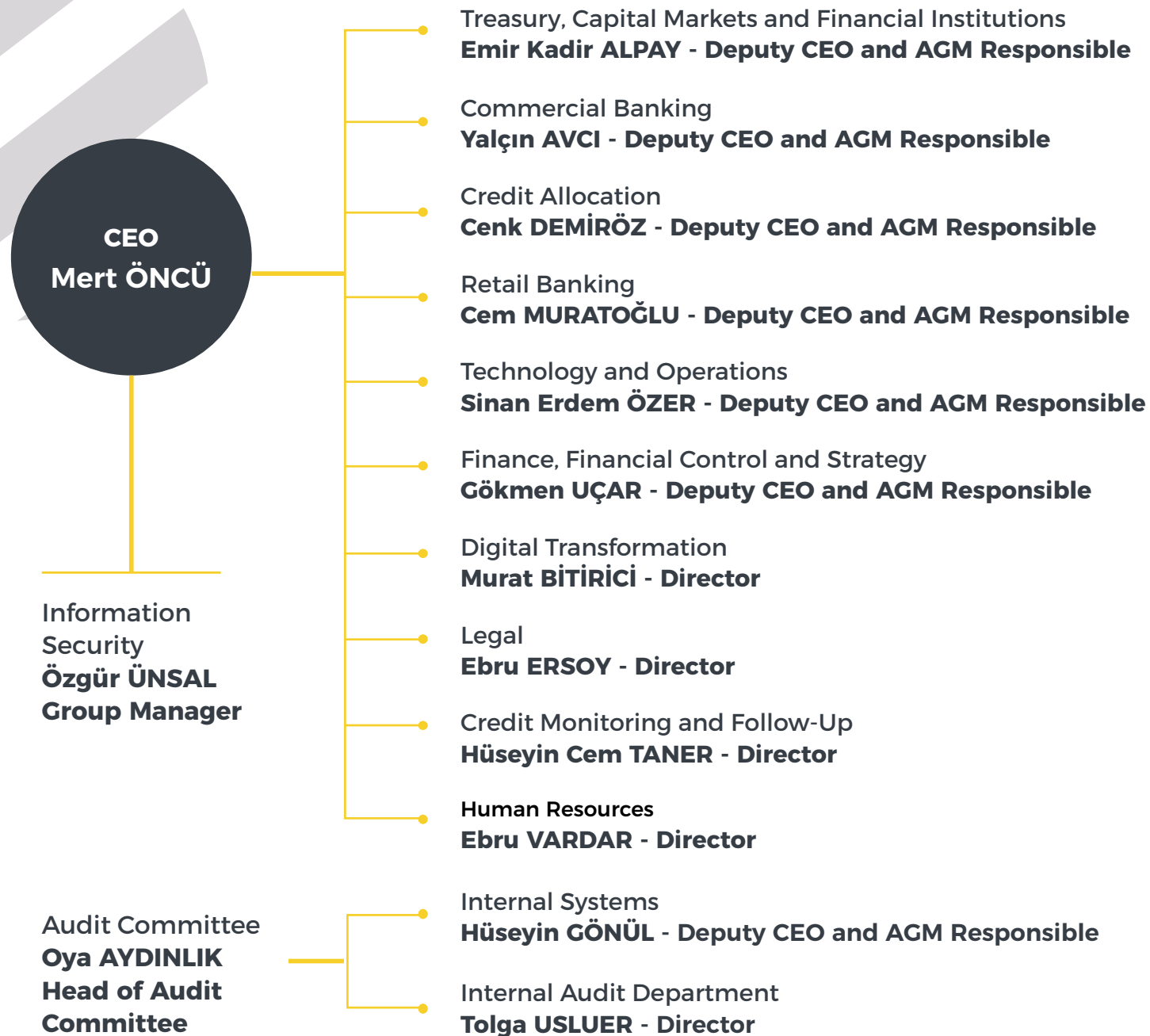
information belonging to third parties, etc. Employees are also offered trainings on the risk of misconduct and corruption.

It is among the Code of Ethics that the persons in the decision-making mechanisms do not make choices contrary to the Bank’s interests, do not acquire advantage due to unfair competition, and do not resort to illegal actions.

Odeabank employees are expected to fully comply with all of these ethical principles. The Whistleblowing Reporting Line, accessible to all employees, and the relevant procedure specify and announce the actions our employees should take in case of an irregularity or violation and the channels, authorized units and/or persons they can directly communicate with and describe in detail the process for making internal notifications in cases of fraud, corruption, forgery, unethical behavior and non-compliance with legal regulations. In the process carried out by the Internal Audit Department, information pertaining to the employee who has made the notification remains completely anonymous. This practice aims to prevent any negative situation that the employee may encounter due to the notification.

ORGANIZATIONAL STRUCTURE AND EXECUTIVE BOARD MEMBERS

Odeabank's organizational chart is provided below:



Dr. Mert ÖNCÜ - CEO



Having obtained his undergraduate degree from İstanbul Technical University's Department of Electronics and Communication Engineering, Dr. Mert Öncü continued his post-graduate studies in the field of Business Administration at Chicago DePaul University and worked as an assistant at the same university. Between 1992-1994, he completed his internship at the Chicago Mercantile Exchange Group.

Öncü received his PhD in Banking from Marmara University's Banking and Insurance Institute in 2001.

He completed the "Growing Leaders and Growing Companies Certificate Program" in INSEAD France in 2010 and the "Advanced Management Program" (AMP) at Harvard University in 2017. Öncü started his career at Koçbank in 1994 and took part in the Koçbank-Yapı Kredi merger in 2006. After the merger, he assumed senior responsibilities in Treasury Management at Yapı Kredi. In addition to these duties, he also served as Member of the Board at the Futures and Options Exchange, which was operational in İzmir between 2007-2013. In 2011, Öncü served as Executive Vice President for Treasury and Financial Institutions and Executive Board Member at Yapı Kredi, as well as member of Yapı Kredi Investment Board of Directors as of January 2018 and was appointed as CEO and Board Member of Odeabank on April 2, 2018.

Emir ALPAY - AGM Responsible for Treasury, Capital Markets and Financial Institutions



Emir Alpay received his bachelor's degree in International Business and Marketing at Marmara University in 1996 and his master's degree in International Business at North London University in 1997.

Starting his career at Koçbank in 1999, Alpay moved to Yapı

Kredi Bank in 2006, where he assumed the positions of Corporate Sales Director, Treasury, Derivatives and Foreign Exchange Markets Group Director, respectively, and was appointed as the CEO of Yapı Kredi Asset Management in 2013. As of September 2019, Alpay has been serving as AGM Responsible for Treasury, Capital Markets and Financial Institutions at Odeabank.

Yalçın AVCI - Deputy CEO and AGM Responsible for Commercial Banking



Avcı received his undergraduate degree from Middle East Technical University's Department of Metallurgical Engineering in 1995 and his master's degree from Ankara Bilkent University's Department of Business Administration in 1997. He worked as Credit Analyst and Customer Representative at Türk Boston A.Ş. between 1995-1997, and as Customer Representative at İktisat Bank Ankara Branch between 1997-1998.

After working as Expert Customer Representative between 1998-2000 and as Assistant Manager between 2000-2002 at HSBC Bank, he went on to serve as Corporate Banking Group Manager between 2002-2005 and as Head of Corporate Banking Sector between 2005-2010. Between 2010-2012, he served as Head of Corporate Banking Group. Yalçın Avcı, who has been serving as Vice President for Corporate Banking at Odeabank since 2012, works as AGM Responsible for Commercial Banking since November 2018 with the merger of Corporate and Commercial Banking and SME Banking business lines, and Deputy CEO since November 2019.

Cem MURATOĞLU - AGM Responsible for Retail Banking



Cem Muratoğlu received his master's degrees in Petroleum Engineering from Middle East Technical University's Faculty of Engineering in 1989 and in Business Administration from Ankara Bilkent University in 1992.

He started his banking career at Interbank A.Ş. in the same year,

engaging in corporate banking. In the past, he has held various positions in the fields of strategy, corporate banking and retail banking in medium- and large-sized private banks of Türkiye. Since 2008, he has been working as senior manager (Executive Vice President) in similar positions. Since 2012, he has been serving as the AGM Responsible for Retail Banking at Odeabank.

Cenk DEMİRÖZ - AGM Responsible for Credit Allocation



Cenk Demiröz started working as Customer Representative in HSBC Bank's Corporate Banking Unit in 2000, after graduating from Boğaziçi University's Department of Economics and receiving his master's degree from Cornell University's Department of Economics.

Between 2002-2010, he worked at HSBC Bank's Corporate and

Commercial Loans Unit. After serving as the Co-Chair of Commercial and SME Loans at ING Bank in 2010, he returned to HSBC Bank where he worked as Director of Corporate, Commercial and Financial Institutions Loans Allocation, Market and Counterparty Risks. Demiröz worked as Executive Vice President for Loans and Deputy CEO at Albaraka Türk Bank between 2017-2019 and has been serving as AGM Responsible for Credit Allocation at Odeabank since November 2019.

Sinan Erdem ÖZER - AGM Responsible for Technology and Operations



Sinan Erdem Özer completed his undergraduate degree in Computer Engineering at Middle East Technical University and an MBA program at Koç University. Starting his career at Koçbank in 1994, Özer served as System Engineer, Department Manager, System Support and Operations Group Manager until 2006.

Özer, who also assumed the leadership of the infrastructure team during the Yapı Kredi Bank and Koçbank integration project, served as Manager of Yapı Kredi IT Service and Support Groups between 2008-2010, and the Group Director of Infrastructure, Operations, Internal Customer Support, Security and Subsidiaries Software teams between 2010-2018. Since September 2018, Özer has been serving as Odeabank's AGM Responsible for Technology and Operations.

Hüseyin GÖNÜL - AGM Responsible for Internal Systems



Hüseyin Gönül completed his undergraduate degree in Management Engineering at İstanbul Technical University in 1995. Starting his career with the Demirbank A.Ş. Executive Program in 1995, Gönül served as Internal Auditor at Demirbank A.Ş. between 1996-1998 and as

Internal Auditor and Risk Manager at Dışbank A.Ş. between 1999-2005, respectively.

In 2005, he assumed the position of Credit Risk Management Director at Fortis Bank A.Ş. and was appointed as Rating Models Development Director at TEB A.Ş. in February 2011. Gönül has been serving as AGM Responsible for Internal Systems at Odeabank since June 2019.

COMMITTEES

Mehmet Gökmen UÇAR - Deputy CEO and AGM Responsible for Finance, Financial Control and Strategy / CFO



Mehmet Gökmen Uçar graduated from Boğaziçi University's Faculty of Economics and Administrative Sciences, Department of Economics in 1998. Uçar worked as External Auditor at Başaran Nas External Auditing and SMMM (PwC) between 1998-2002 and received the title of Independent Accountant and Financial Advisor. Joining Koçbank in 2002, Uçar served as Budget Planning and MIS Director in Financial Control and Planning until 2005.

Uçar undertook various management positions in the fields of strategy, budget and planning in Italy, Germany and Austria within the body of UniCredit Group between 2005-2007. Returning to Yapı Kredi

in 2008, Uçar served as Capital Management, Expense Control and Allocation Manager, Head of Financial Reporting Group and Financial Reporting and Accounting Director, respectively. Uçar, who was appointed as the Financial Reporting and Accounting Group Director in 2011, worked as Executive Vice President of Retail Loans starting from August 2012 and also served as KBB Board Member during the same period. Uçar served as Executive Vice President of Human Resources and Organization Management and member of Yapı Kredi Bank's Executive Committee from January 2016 until July 2018. Appointed as Vice President for Strategy and Business Development at Odeabank in July 2018, Mehmet Gökmen Uçar has been serving as AGM Responsible for Finance, Financial Control and Strategy/CFO since November 2018 and Deputy CEO since December 2021.

Within Odeabank, there are 21 General Manager committees, called the Internal Systems Committee, reporting to the Board of Directors and the Executive Board. Bylaws, authorities, responsibilities and reporting requirements of all committees are specified in the Corporate Governance Policy.



The committees of the Board of Directors at Odeabank are:

Audit Committee

The Audit Committee functions to oversee the efficiency and adequacy of the Bank's internal systems, the functioning of these systems and accounting and reporting systems within the framework of laws and related regulations, and the integrity of the information produced on behalf of the Board of Directors; to make the necessary preliminary assessments in the selection of external audit firms and rating, valuation and support service institutions by the Board; and to regularly monitor and coordinate the activities of these organizations, chosen and contracted by the Board.

Corporate Governance Committee

The Corporate Governance Committee functions to support the Board in monitoring compliance with the Bank's Corporate Governance principles, to carry out improvement efforts and to make suggestions to the Board of Directors.

Remuneration Committee

The Remuneration Committee functions to support the Board of Directors by monitoring and auditing the Remuneration Policy and practices on behalf of the Board of Directors, and to ensure that the Remuneration Policy is evaluated.

Ebru VARDAR - Human Resources Director



Ebru Vardar, who graduated from İstanbul Technical University's Department of Industrial Engineering, started her career at Vestel. Continuing her career as HR consultant at Arthur Andersen in 1997, Vardar participated in many restructuring projects in different sectors during her 6 years of consultancy experience.

In 2003, she assumed the role of HR Director at Ernst & Young. In 2013, Vardar transferred to Yapı Kredi Bank and continued as HR Director. Throughout her career, Vardar carried out projects on corporate culture, employer branding, performance management and reward systems, recruitment, and talent management. Ebru Vardar, who most recently served as AGM Responsible for Human Resources at Boyner Department Stores, joined Odeabank in 2020.

Risk Committee

The Risk Committee is responsible for determining the Bank's risk appetite, examining and approving the risk framework and policies, reviewing periodic risk reports and monitoring the risk functions within the Bank. It reflects on the Bank's risk policies and risk appetite and makes recommendations to the Board of Directors. The committee monitors the Bank's risk profile for all risk types. It is the committee that works to monitor the management framework of the said risks and to evaluate the efficiency.

Loan Committee

The Loan Committee works to provide support to the Board of Directors on loan disbursement within the limits of its authority.

Credit Committee (CEO Authority)

The committee evaluates the loan proposals that fall under the authority allocated to the CEO to allocate credits within the framework of the delegation of authority undertaken by the Board of Directors.

Credit Committee (Joint Authority of AGM-Head of Credit Allocation)

The committee evaluates the credit proposals that fall under the credit allocation authority, which can be exercised jointly, allocated to the AGM and the Head of Credit Allocation within the framework of the delegation of authority undertaken by the Board of Directors.

Administrative and Legal Follow-up Committee

All kinds of file receivables in the 2nd and 3rd Group that are determined as risky are under the supervision of the Administrative and Legal Follow-up Committee. The committee examines these file receivables and takes the necessary decisions in order to determine the risks, to minimize the receivables losses and to ensure the timely collection of these receivables. Additionally, it submits large-scale and complex file receivables that need special attention to the relevant approval authority (Loan Committee and/or Board of Directors) together with advisory opinions. It may also suggest minimum provision

rates for files under its responsibility. The line committees at Odeabank are:

Executive Committee (EXCO):

The committee develops and implements business policies within the framework of the policy and strategy approved by the Board of Directors and under the leadership of the CEO.

Assets-Liabilities Committee

The committee convenes to assess the issues related to the Bank's balance sheet, liquidity, interest risk and profitability in order to maximize the Bank's income within the risk appetite and tolerance determined by the Board of Directors, and to take decisions when necessary, to develop assets-liabilities management policies and procedures, to observe compliance with the ratios determined by the legal authorities, to implement the Bank's goals and objectives, and to evaluate the Bank's risk and profitability.

Disciplinary Committee

The committee is responsible for the disclosure and management of the regulations and practices regarding the actions, behaviors and transactions of employees in and/or outside the Bank that are not in compliance with the legislation, and the sanctions to be imposed.

Procurement Committee

The committee was established to make purchasing decisions by evaluating product and service procurement issues.

Information Security Committee

The committee is responsible for overseeing and prioritizing the Bank's policies, procedures and related documents pertaining to information security; approval of the security plan; implementation of the provisions of the Corporate Information Security Policy for all assets held by the Bank; providing clear direction and management support for all information security related works; monitoring and direction of all these efforts within the Bank, and examination and evaluation of the periodic reports prepared by the Information Security Unit.

Information Technologies (IT) Steering Committee

The committee is responsible for determining the priorities of IT investments and projects, monitoring the status of ongoing IS projects, resolving resource conflicts between projects, offering necessary guidance to ensure compliance of IT architecture and IT projects with the legislation, and monitoring service levels regarding IT services.

The IT Steering Committee meets at least twice a year and reports to the IT Strategy Committee at least once a year.

Information Technologies (IT) Strategy Committee

The committee is responsible for overseeing the appropriate use of IT investments in line with the IT strategy plan and the alignment of the Bank's business objectives with IT objectives; reporting directly and regularly to the Board of Directors on these matters; reviewing the IT strategy plan at least once a year, revising it when necessary, submitting it to the approval of the Board of Directors and overseeing the activities of the IT Steering Committee. The IT Strategy Committee meets at least twice a year to review whether the IT strategy plan is properly implemented and to assess important IT investment decisions, and reports to the Board of Directors at least once a year.

Customer First Committee

The committee was established to evaluate the prominent issues in the notifications/requests/complaints submitted by the customers, and to determine permanent actions to minimize complaints.

Digital Strategy Committee

The goal of the committee is to examine the ecosystem in order to keep the Bank's digital strategy up to date and improve it, and to evaluate the innovations, global and local trends, threats and opportunities in the sector.

IFRS 9 Impairment Committee

The committee was established to determine all the decisions to be taken regarding IFRS 9 and to take the necessary actions.

Expense Management Committee

The committee was established for the purpose of evaluating the expenditure demands over certain budgeted or unbudgeted amounts, giving the approval for expenditure, and monitoring the realization of the expenditure budget.

Information Systems (IS) Continuity Committee

The committee aims to ensure the continuity of the IS services used in carrying out banking activities and is responsible for declaring a crisis situation by taking into account all the factors related to the cyber incidents, deciding on the activation of the information systems continuity plan, and ensuring coordination with other rescue, continuity and response teams.

Internal Systems Committee

The committee functions with the aims of ensuring the dissemination and strengthening of an internal systems culture consistent with the directives and guidelines of the Board of Directors throughout the Bank, preserving the harmony between internal systems functions and business lines by ensuring that they are discussed on a common platform, and ensuring that final Senior Management opinions are formed within the authorities delegated by the Board of Directors in relation to the differences between the functions of business lines and internal systems that fall under its scope.

INTERNAL SYSTEMS, LEGISLATION AND COMPLIANCE

Having established its internal systems framework in line with the relevant regulations, primarily the Banking Law No. 5411 and the “Regulation on the Internal Systems of Banks and Internal Capital Adequacy Assessment Process”.

Having established its internal systems framework in line with the relevant regulations, primarily the Banking Law No. 5411 and the “Regulation on the Internal Systems of Banks and Internal Capital Adequacy Assessment Process”, Odeabank has developed the essential policies, regulations and procedures for the efficient execution of the necessary banking functions, including risk management, legislation and compliance, and presented this information to all its employees.

Information on the functions that continue their activities under the Board of Directors through the Audit Committee are given under the headings below.

Internal Audit Department

At Odeabank, internal audit activities are carried out by the Internal Audit Department in line with the relevant laws and regulations. The purpose of the Internal Audit Department is to provide assurance regarding the execution of the Bank’s activities in accordance with the law and other relevant legislation, and the internal strategies, policies, principles and objectives, as well as the effectiveness and adequacy of the internal control and risk management systems. In addition to the assurance and consultancy activities carried out under the main headings of Head Office functions, business processes, information technologies, branches, investigations and enquiries, data analytics activities are carried out in the areas of fraud detection and continuous auditing, and scenario-based monitoring and follow-up activities are performed. Based on the results obtained during all the studies carried out, actions are suggested to improve the internal control environment of the Bank and to manage risks more effectively, and the implementation of the actions suggested in the previous

terms is monitored.

The percentage of the business units that are internally audited, the audits to be carried out on an annual basis and the scope of these audits are determined following the risk assessment studies carried out at least once a year within the scope of the relevant laws and regulations of the authorities. In these studies, many factors such as the Bank’s previous system and process evaluations, audit frequency, risk control self-assessment results, the Bank’s strategies, areas for improvement and threats, external audit and regulatory audits are taken into account, and audit priorities are determined. Throughout this process, we act professionally, objectively, honestly and independently, with a vision compliant with international internal audit standards. The Internal Audit Department also plans to carry out assurance activities for the concept of sustainability in the medium and long term.

Within the scope of the “Corporate Governance” carried out by the Internal Audit Department in line with the 2021 audit plan, the adequacy of all written sources (policies, regulations, etc.) approved by the Board of Directors, their compliance with local and international legislation and in-bank practices, committees, their structures and their functioning in terms of corporate governance were examined.

Internal Control Department

Within the framework of carrying out banking activities in line with current policies, methodologies and relevant regulations, the department is responsible for monitoring and independent evaluation of financial, operational and other controls, and reporting the results to the Senior Management in a timely and effective manner.

The Internal Control Regulation, which includes the principles of the internal control system adopted and operated by Odeabank and the working procedures of the Internal Control Department, has been published. Accordingly, the internal control system is an integrated process affecting the overall organization and is implemented by the management and all employees of the Bank, designed to provide reasonable assurance in achieving the determined objectives and fulfilling its mission. Internal control, as a part of all daily activities of the Bank, is carried out first by the employees performing the activity and their managers, and then by the employees of the Internal Control Department. In addition, the Internal Control Department aims to prevent errors arising from legislation, implementation and process design by performing the last checks of all updated or newly created policies, procedures and workflow charts before they are put into practice.

Compliance with Legislation and Protection of Personal Data

The unit is responsible for following the legislative changes and ensuring that they are announced within the Bank, establishing a link between the Bank and regulatory authorities in terms of legislation, answering the questions of the Bank employees about the legislation, as well as the management of compliance with the Personal Data Protection Law and increasing the awareness on the internal legislation.

Legal changes made in the Bank are followed up by the Legislation Unit, the changes are announced to the relevant departments, and if there is a need for regulation or systemic improvement in business processes due to the necessity of legal changes, it undertakes the duty of consultancy in this process.

Within the scope of the protection of personal data, consultancy activities are carried out within the Bank by evaluating business processes, reviewing new products and services within the framework of the Law No. 6698 on the Protection of Personal Data and other national and international legislation and regulations.

Combatting Financial Crimes- Compliance

The unit is responsible for the execution of compliance activities within the scope of the Law on the Prevention of Laundering of Proceeds of Crime and the Financing of Terrorism and related national and international legislation and regulations, national and international sanction practices, and the management of compliance risks that the Bank may face.

Odeabank, within the scope of its obligations determined by local and international legislation and rules, undertakes not to act as an intermediary in transactions related to laundering proceeds of crime, financing of terrorism and illegal activities, directly or indirectly, and to take the necessary precautions and measures.

It undertakes consultancy duties in business processes by carrying out monitoring and control activities for fulfilling the obligations determined by the Law No. 5549 on the Prevention of Laundering Proceeds of Crime, strengthening the risk-oriented approach in customer acceptance and risk assessment processes.

Fraud Prevention

The unit is responsible for taking the necessary preventive measures in order to detect fraud and internal and external counterfeit cases that may occur in payment systems, alternative distribution channels, individual loan and credit card application processes, and acquisition of new customers; responding to letters from official institutions; and developing the necessary processes and infrastructure for the management of the risk of fraud. It carries out monitoring, inspection and control activities in order to detect application and transaction fraud. In addition, it undertakes consultancy duties in the development of preliminary controls by monitoring national and international fraudulent activities, and in the development of business processes within this scope.

RISK MANAGEMENT APPROACH

The Bank manages its risks and opportunities based on the Regulation of the Risk Management Department. Odeabank has had a Risk Management Regulation since 2012,



Odeabank steers its activities by determining its risks in line with its short, medium and long-term goals and strategies. The Bank manages its risks and opportunities based on the Regulation of the Risk Management Department. Odeabank has had a Risk Management Regulation since 2012, when it started operating. The purpose of this regulation is to specify risk management in the Bank by defining the task, scope, principles, risk management framework, risk management process, duties and responsibilities of the risk function established to support the Bank's strategic objectives. The risk identification process is one of the most important steps of the risk assessment process. Defining the Bank's risks in the best and most accurate way

keeps the Bank in a position to take action in case of an unexpected situation. When identifying the Bank's risk, the possible consequences are determined based on the source of the risk and the incidents through which the risk might occur. The Bank is obliged to take the actions necessitated by the risk, and to take measures to reduce the likelihood of risk or the impact of the risk. Relevant actions and measures are presented to the Senior Management in the Risk Committee evaluations.

At Odeabank, risk management is evaluated, monitored and followed through three different units.

Credit Risk Unit

The Credit Risk Management determines the limits according to the risk strategy and appetite by adhering to the legislation, monitors them regularly and reports them to the Audit Committee and the Board of Directors. In addition, by making regular analyzes, it prepares action plans to be implemented in case of a mismatch between the Bank's risk profile and the risk appetite approved by the Board of Directors, to ensure alignment with the defined risk appetite. It is the Credit Risk Management's responsibility to calculate the provisions required to be set aside the Bank within the scope of the rules determined by the BRSA and TFRS 9, and to prepare and maintain their entire infrastructure. In addition, Credit Risk prepares the report on ICAAP (Internal Capital Adequacy Assessment Process) within the scope of compliance with legal capital requirement regulations. Credit Risk Management also carries out the activities of calculating capital adequacy and modeling credit risk parameters (probability of default, amount of default, loss in case of default).

Market and Asset-Liability Risk Unit

The unit is actively involved in the processes of managing the market risk arising from the trading portfolio, counterparty credit risk related to derivative products, structural interest rate and liquidity risks within the scope of balance sheet risks and establishing and implementing policies related to these risks. Relevant risks are measured in accordance with national regulations, Bank and Bank Audi risk policies, and monitored, reported and managed within the framework of risk limits approved by the Board of Directors.

Operational Risk and Business Continuity Unit

Activities carried out within the Bank in the field of operational risk include monitoring, recording, reporting, updating operational risk policies and procedures, determining the Bank's operational risk profile, establishing and following up preventive and remedial actions for risk and loss in line with Basel II and local regulations. Business continuity efforts include the coordination of activities for the adequacy and readiness of critical business processes and technical infrastructure in order to prevent the interruption of operations after a

possible disaster, updating business continuity policies and procedures, realization and updating of Business Impact Analysis studies, preparation of business recovery plans, and conducting Business Continuity tests.

Odeabank manages the Bank's main risks under six headings. These are:

- Credit Risk,
- Market Risk,
- Operational Risk,
- Liquidity Risk,
- Structural Interest Rate Risk,
- Reputation Risk.

The fundamental risk management principles adopted by the Bank's Board of Directors are:

- The risk function supports business lines and decision makers to make the right decisions.
- The Bank's risk management responsibilities are based on 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 External Audit (third line of defense).
- The risk function cannot veto the commercial decisions taken. If there is a negative assessment regarding the decision, it is reported to the Board of Directors through the Risk Committee.
- Risks are shared with various internal and external parties in a transparent, systematic, structural, accurate, duly and timely manner.
- The risk appetite approved by the Board of Directors determines the risk limits that the management can operate within the Bank. The Risk Management Department keeps the risk appetite within the determined risk limits. It submits the necessary reports to the Senior Management and the Board of Directors.
- Risk management strives to constantly improve by:
 - Improving governance,
 - Searching for new and better measurement methods,
 - Continuously improving its own policies and procedures,
 - Adopting sector best practices. The risk function maintains and develops the Bank's financial strength by ensuring that risks and returns are properly balanced.



03

SUSTAINABILITY APPROACH

Sustainability Strategy / Policy

Sustainability Management Structure

Materiality Analysis

SUSTAINABILITY STRATEGY/POLICY

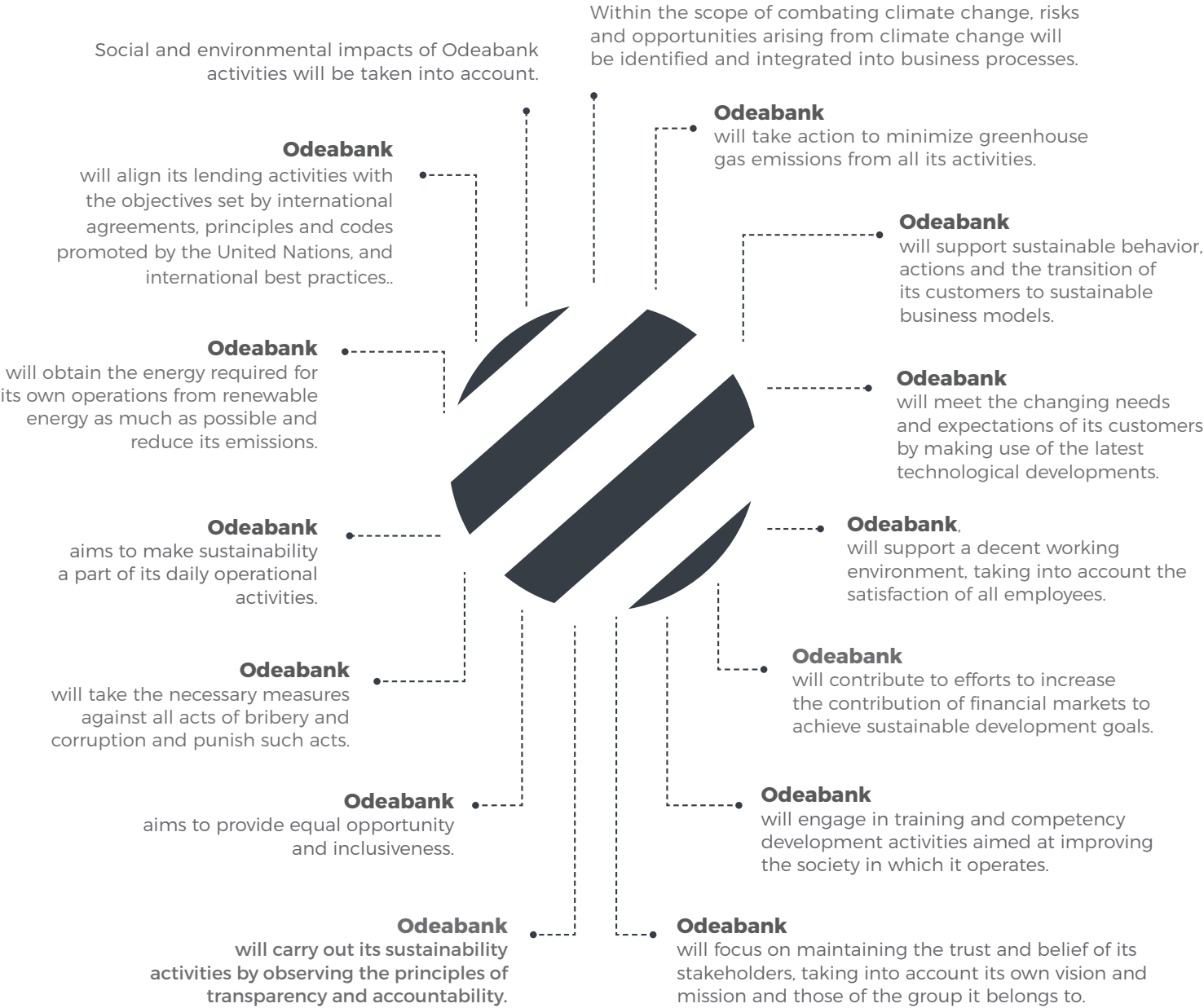
Odeabank carries out its activities with the awareness of its contribution to the sustainability of the financial sector.



In this context, it contributes to the sustainable growth of our country by steering its activities under the guidance of the United Nations Sustainable Development Goals and good practices. The principles and control objectives of the support provided by

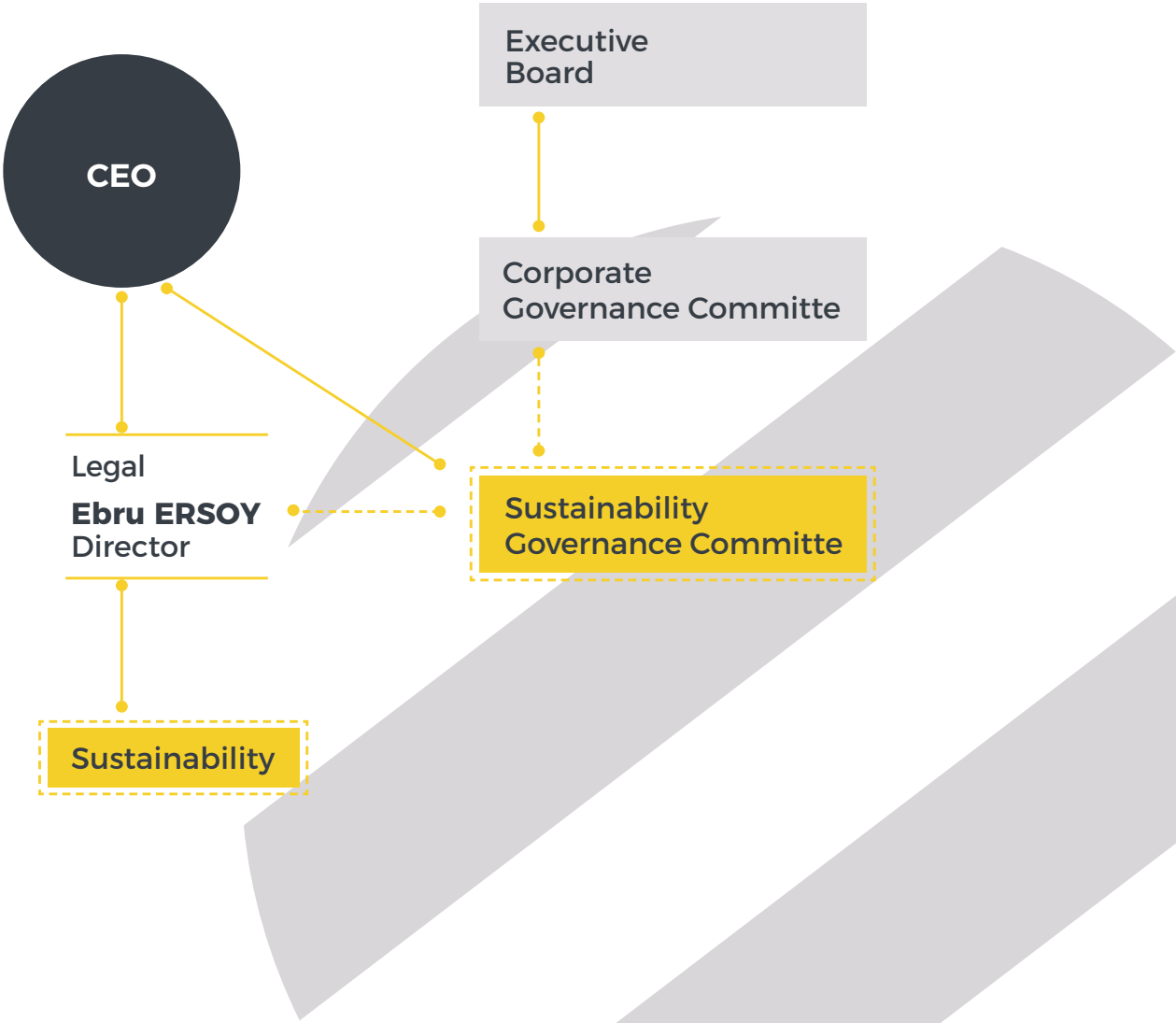
Odeabank to sustainable development are defined in the Odeabank Sustainability Policy published in 2022. Odeabank is in the process of developing a Sustainability Strategy, and it will be published in 2023.

The sustainability principles determined within the scope of the Odeabank Sustainability Policy are:



SUSTAINABILITY MANAGEMENT STRUCTURE

Odeabank’s Sustainability Management Committee was established under the chairmanship of the General Manager to discuss the development and efficiency of sustainability-related activities, and strategic decisions to be taken on environmental, social and governance issues. The Committee, which meets with the determined management level and the participants, periodically reports the work in the field of sustainability and internal developments to the Corporate Governance Committee.



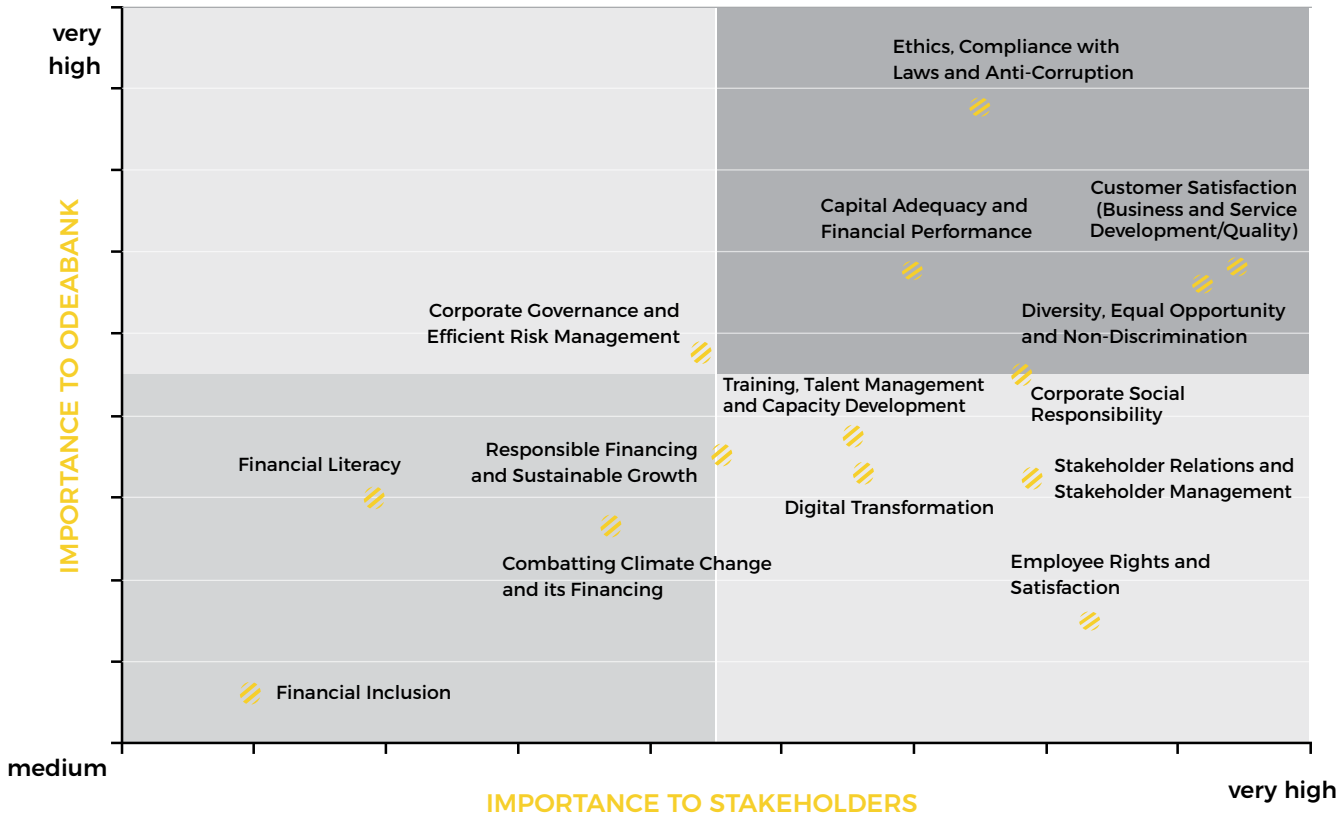
MATERIALITY ANALYSIS

Odeabank conducted the “Odeabank Sustainability Priorities Study” for the first time in 2021 in order to identify important issues in the field of sustainability.

Odeabank conducted the “Odeabank Sustainability Priorities Study” for the first time in 2021 in order to identify important issues in the field of sustainability. The study was carried out by following the survey method, covering the internal and external stakeholders of Odeabank. 444 responses from internal stakeholders, including employees, Senior Management and shareholders were received, in addition to 92 responses from external stakeholders, including suppliers, customers, NGOs, universities and public institutions, amounting to 536 responses in total.

Out of the 14 evaluated themes, 5 were rated as very high priority:

- Ethics, Compliance with Laws and Anti-Corruption
- Customer Satisfaction (Business and Service Development/Quality)
- Diversity, Equal Opportunity and Non-Discrimination
- Capital Adequacy and Financial Performance
- Corporate Social Responsibility



SDG Map of Activities

The map with reference to the Sustainable Development Goals (SDGs) of the 5 themes that were evaluated as the highest priority in the Odeabank Sustainability Priorities Study is provided above.





There's a world where there's
no harm to nature

04

RESPECT FOR THE ENVIRONMENT

Management of Environmental and Social Risks due to Lending Activities / ESMS
Management of Direct Environmental Impacts

MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS DUE TO LENDING ACTIVITIES / ESMS



Odeabank monitors the environmental and social impacts and risks of the loans it has allocated throughout the loan allocation processes. The Bank carries out its activities within the scope of sustainable development by taking into consideration the contribution of the lending process to environmental and social sustainability in the banking sector, its field of activity. In order to reduce the indirect risks arising from lending activities, the Environmental and Social Policy and the List of Prohibited Activities have been published since 2013. In 2016, major changes occurred in the systematic of assessment of environmental and social risks, and all corporate/commercial and SME loans began to be evaluated without a limit on the loan amount.

Odeabank's Environmental and Social Risk Assessment Procedure sets out the framework in which the social and environmental risks of the loans to be allocated to corporate/commercial customers and SMEs are assessed. The procedure is based on the Odeabank Environmental and Social Policy. The practices on which the policy is based are the practices of international institutions such as the International Finance Corporation (IFC), and the European Bank for Reconstruction and Development (EBRD). The "Environmental and Social Risk Team" within the Bank examines the environmental and social risk assessments of customers within the framework of the

Odeabank Environmental and Social Management System. The risk assessment process, which begins at Odeabank branches, is finalized with the coordination of the Environmental and Social Risk Assessment Team, Branch Marketing, Corporate and Commercial Loans Allocation, and the Credit Coordination business units, and the completion of the "Environmental and Social Management System Risk Assessment Form" in the light of the documents obtained from loan customers. With the help of the decision matrix method, necessary actions are determined and the environmental and social risk category of the sector is defined according to international standards. In addition to environmental and social risks, Odeabank also evaluates the "List of Prohibited Activities", and any activity on this list is not financed.

Odeabank groups its project loans into three categories using the EBRD categorization.

Category A: **High Risk Projects**
Category B: **Medium Risk Projects**
Category C: **Low Risk Projects**

If it is foreseen that the social and environmental effects of the allocated loans should be monitored within the Environmental and Social Management System, an Environmental and Social Due Diligence Report prepared by an independent consultant is requested for the projects. Within the scope of the report, it is expected that action plans regarding the management and mitigation of these risks are presented in matters involving risk. When necessary, Odeabank can monitor/audit the project within the environmental and social action plan through an independent consultant or environmental and social risk expert. In this way, compliance with environmental and social legislation and applicable IFC Performance Standards is evaluated. Issues expected to be considered within the scope of the environmental and social assessment to be prepared may include effective use of resources and prevention of pollution, work and working conditions, public health, safety and security, public participation and information, physical and economic displacement, conservation of biological diversity and protection of natural resources, protection of ecosystems, sensitive areas and cultural heritage.



Management of Direct Environmental Impacts

Greenhouse Gas Emission and Energy Consumption Data

EMISSION DATA	UNIT	2019	2020	2021
Scope 1	tCO _{2e}	1,321	986	1,022
Scope 2	tCO _{2e}	3,273	2,735	2,964
TOTAL	tCO _{2e}	4,594	3,721	3,986

Greenhouse gas (GHG) emissions are grouped into 3 categories (which are also called “Scopes”) by the Greenhouse Gas (GHG) Protocol, which is a commonly used international carbon footprint accounting tool. As part of its first Sustainability Report, Odeabank decided to focus on Scope 1 and 2 emissions. In this report, Scope 1 includes greenhouse gas emissions from natural gas, diesel and gasoline consumption, and refrigerant leaks. Scope 2 includes greenhouse gas emissions from electricity consumption. Odeabank plans to include Scope 3 in its GHG inventory the near future.

ELECTRICITY CONSUMPTION	UNIT	2019	2020	2021
Electricity	kWh/yr	6,761,779	5,650,900	6,123,328

NATURAL GAS CONSUMPTION	UNIT	2019	2020	2021
Natural Gas	m³/yr	289,140	218,288	256,591

WATER CONSUMPTION	UNIT	2019	2020	2021
Tap Water Consumption	m³/yr	25,800	11,550	8,791

NON-HAZARDOUS WASTE	UNIT	2019	2020	2021
Domestic Waste	kg/yr	18,000	6,000	12,000
Paper	kg/yr	10,501	1,576	1,059
Total Non-Hazardous Waste	kg/yr	28,501	7,576	13,059

HAZARDOUS WASTE	UNIT	2019	2020	2021
Batteries	kg/yr	-	8,553	-
Toner Cartridges	kg/yr	15,807	9,862	8,330
Medical Waste	kg/yr	120	20	60
Total Hazardous Waste	kg/yr	15,927	9,882	8,390



Energy Management and Efficiency Practices

Odeabank launched the Sustainable Energy Management Platform in December 2016. With this platform, energy consumption, compensation systems, generators and UPS equipment of all Odeabank branches are monitored in real time using blockchain technology. Thanks to the platform:

- The energy consumption of the branches is monitored, and savings are achieved in electricity consumption with the monitoring of office and out-of-office consumptions.
- Reactive penalties are avoided.
- In case of generator or UPS failures, quick interventions are made with remote intervention, and energy cuts to our branches are minimized. Moreover, possible malfunctions can be prevented by monitoring UPS and generator systems instantly.
- As of December 2016, the system has taken important steps for a sustainable energy system by making 256,000 operational business analyzes.
- Since the commissioning of the platform, 6,738,144 kWh of energy has been saved.
- Since the commissioning of the platform approximately 3,514 tons of CO₂ emissions have been prevented.
- With the release of 1,150 tons in 5.5 years, we reduced consumption as much as the absorption by approximately 189,000 trees in a year and supported the nature.

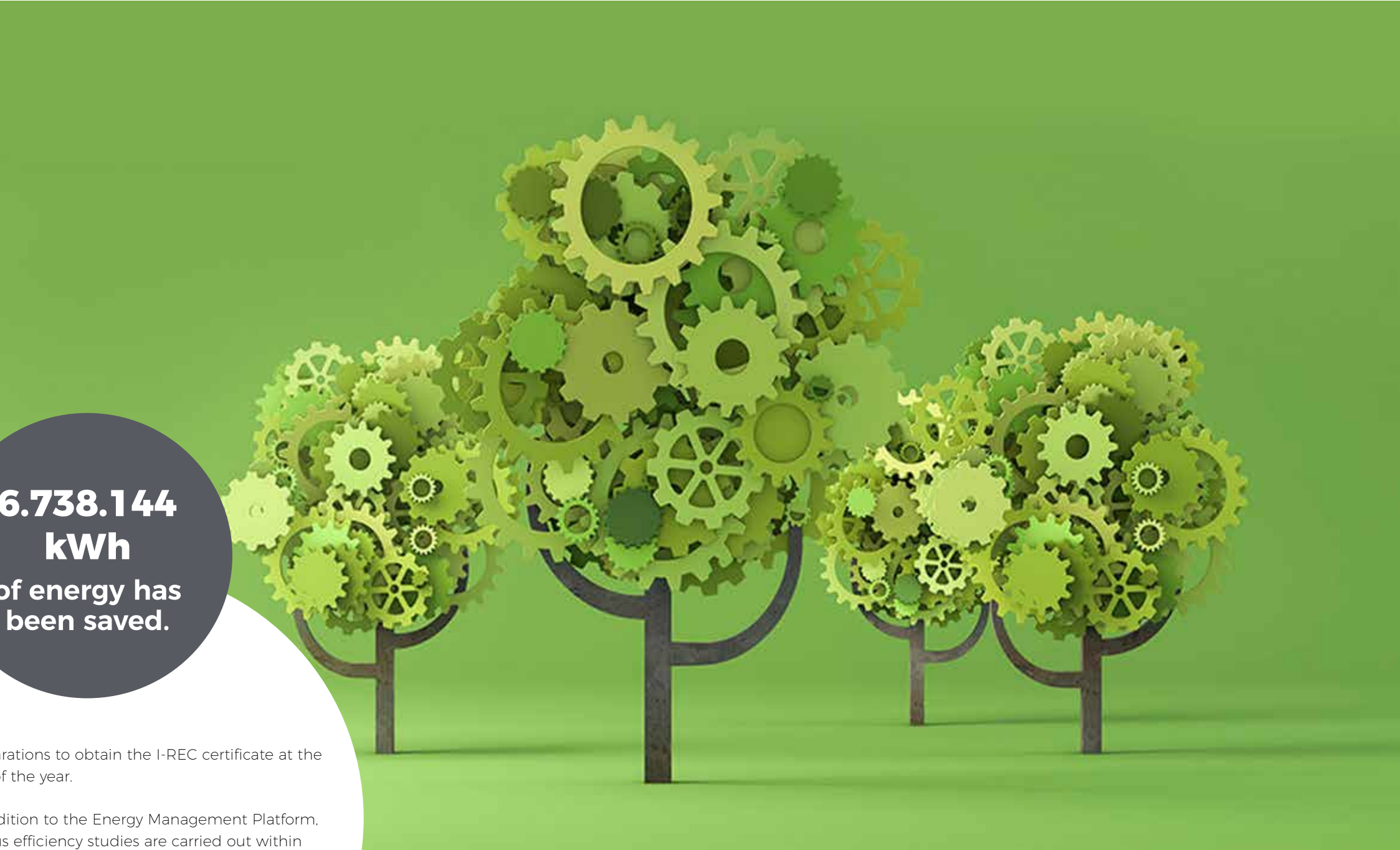
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3,514 tons
of CO₂
emissions have
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Odeabank supplies the 100% of the electricity used in all of its branches from renewable sources. The Bank received an I-REC certificate indicating that its electricity consumption in 2021 was supplied as renewable energy. It has also taken the necessary steps regarding renewable energy consumption in 2022 and completed its

6.738.144 kWh
of energy has
been saved.

preparations to obtain the I-REC certificate at the end of the year.

In addition to the Energy Management Platform, various efficiency studies are carried out within Odeabank. Odeabank continues its efforts to mitigate its direct environmental impact without losing speed.





COMMUNITY RELATIONS

Odeabank and Art: O'Art
Community Dialogue: O'Blog and O'Mag
Corporate Social Responsibility Approach
Memberships



ODEABANK AND ART: O'ART

Odeabank's art platform, O'Art, was founded in 2015 based on the idea that art should be accessible and visible to everyone.



Odeabank strengthens its relations with all segments of society by organizing exhibitions, workshops and talks through the contemporary art approach it has adopted with O'Art.

O'Art presents all disciplines of today's art to the society in different venues, together with the criticism of the current problems of the socio-cultural structure. The artist-work-space-audience relationship established in physical exhibition through O'Art was transferred to digital platforms in 2021 due to the impact of COVID-19. In the exhibitions held in this way, support for new art production continues without restricting form, shape, content and approach.

Since its establishment, the sphere of influence of art has been expanded through 22 exhibitions held on

the O'Art platform. Young people who criticize, think, are interested in and create art were brought together through art competitions. Moreover, the works of artists from all over the world engaged in contemporary art, digital art, installation, drawing, photography and many different disciplines were opened to visitors. In this way, with the cooperation of many galleries and art venues, contributions were made to the visibility of artists and art. O'art exhibitions are also available online since 2020. Virtual exhibitions can be experienced by lovers of art on the Odeabank website.

A retrospective list of the art activities carried out by O'Art is:

- Özge Topçu's digital installation "House/Chamber", a site-specific installation,
- The "Lorem Ipsum" exhibition, which shows two opposite approaches in which typography is either transformed into a tool or adopted as an aim,
- CANAN's solo exhibition titled "Hayal-i Alem", where she produces fairy tale mythological figures in different forms,
- The "şey: nesnenin ihtimali" exhibition, which reveals the constructed aesthetic and critical potential of objects in daily life,
- The "Işıklılık/Skylight" digital event, Özge Topçu's site-specific installation,
- The digital exhibition "ŞİMDİ 2021", showing the effect of the new reality brought on by the global pandemic on the artist's thoughts and feelings,
- The exhibition "Altı Üstü", which examines the relationship of the visible with the basic needs of human beings,
- The "Şimdi" exhibition, which brings a critical perspective to the effort to reach the "new" in today's art
- Sculpture-sound installation "Kadim Zamanlardan", composed of 1500 site-specific pieces specifically produced for Odeabank O'Art Gallery Area by Evren Erol,



"Hayal-i Alem" isimli solo sergi

- Turan Aksoy's works titled "Sandığın Gibi Değil", centering on the individual's behavior as a reflection of or reaction to the idealized values of the society,
- Michael Kenna's "Forms of Japan" exhibition as part of Fotoistanbul Beşiktaş International Photography Festival,
- Harold Feinstein's retrospective exhibition titled "A Photographer's Legacy",
- The "Çizim Bugün" exhibition reflecting the importance of drawing and drawing-based strategies in contemporary art,
- The "Aşk'la, Semiha Berksoy" exhibition, which took place in parallel with the launch of the most comprehensive book on Semiha Berksoy,
- Nick Brandt's photography exhibition titled "Inherit The Dust", centering on the theme of the environmental crisis,
- The "Magiscape" exhibition, which brought together Slovenian and Turkish artists,
- The "Bas Buluş" exhibition, which included original prints by Turkey's leading artists,
- The group exhibition titled "Multiple Existences" created by foreign artists living in Türkiye,
- The exhibition titled "İç Dökmek", which consisted of sketches made by Cem Sağbil during his travels by plane,
- The interdisciplinary "Art Alem" group exhibition, consisting of the works of young artists,
- Painting and sculpture exhibition titled "Ellerin Büyüsü", which includes the works of some of the most important artists in the world,
- The "Yarım Elma, Gönül Alma" exhibition consisting of glass-bottom works by a prominent figure of Turkish art, Mevlut Akyıldız,
- The group exhibition "Modern and Contemporary" consisting of the works of Turkey's leading contemporary and modern artists.

Additionally, in 2016 and 2017, O'Art brought together young artists who see, feel, criticize and create with the O'Art Art Competition and exhibited the award-winning works.



COMMUNITY DIALOGUE: O'BLOG AND O'MAG

Leading the Turkish banking sector with its dynamism and innovation, Odeabank develops solid dialogue with the society and its employees through O'Mag.

It is very valuable for Odeabank in terms of the continuity of its activities to follow the trends in culture, art, business world, finance and economy, sustainability and technology, and thus keep up with the rapidly transforming world. With this awareness, Odeabank not only closely monitors developments in culture, art and life, but also shares the trends with its employees and the entire society through seasonal magazines. O'Magazin magazine, published since 2015 and covering rapidly changing trends and interesting topics such as fashion, culture, travel, art, architecture, gastronomy and new technologies, was rebranded as O'Mag in 2019 with the changing corporate identity of Odeabank.

Leading the Turkish banking sector with its dynamism and innovation, Odeabank develops solid dialogue with the society and its employees through O'Mag. O'Mag plays a motivating and interaction-enhancing role for Odeabank employees and customers with its interesting content, travel suggestions and new experience opportunities. Also providing news on Odeabank, O'Mag offers the opportunity to share important developments for the Bank with the entire society in a transparent manner.

Prepared quarterly and seasonally, O'Mag magazine currently has 24 issues. O'Mag publications, which are shared free of charge, are also distributed at Odeabank branches together with the TimeOut magazine.

Odeabank, which goes beyond O'Mag in its relations with the society, aims to raise awareness and inform the public on sustainability and social issues with O'Blog, a blog where articles are shared on various topics. O'Blog offers content on a variety of topics, including technology, sustainability, saving methods, culture and arts, gender equality, investment and much more. Thanks to this content, which is published as digital articles, the ever-changing trends can be kept up with and the expectations of the stakeholders can be understood more clearly.



CORPORATE SOCIAL RESPONSIBILITY APPROACH



Odeabank aims to create value for the entire society with its social responsibility approach, in addition to its support for sustainable development with the products and services it develops.

In addition to its support for sustainable development with the products and services it formulates, Odeabank aims to create value for the entire society through its social responsibility approach. In this context, since the day it was founded, it has taken an active role and developed collaborations for the realization of its goals in various themes such as gender equality, women’s empowerment, sports, accessibility, education, cultural development, sustainability, benefiting the society and protecting the environment at the national and international level.

Comprehensive and effective volunteering activities are carried out in order to solve social problems within the framework of a corporate social responsibility approach undertaken by employees and managers jointly at Odeabank. Social benefit is created and a positive contribution to society is made through social responsibility projects that are designed and carried out. The number of corporate social responsibility activities and social investments of Odeabank in the last 3 years and the amount spent on them are provided below.

CORPORATE SOCIAL RESPONSIBILITY PROJECTS	2019	2020	2021
Number of projects	2	4	5



A project which creates
awareness of

gender equality

Eşit Masallar (“Fair Tales”)

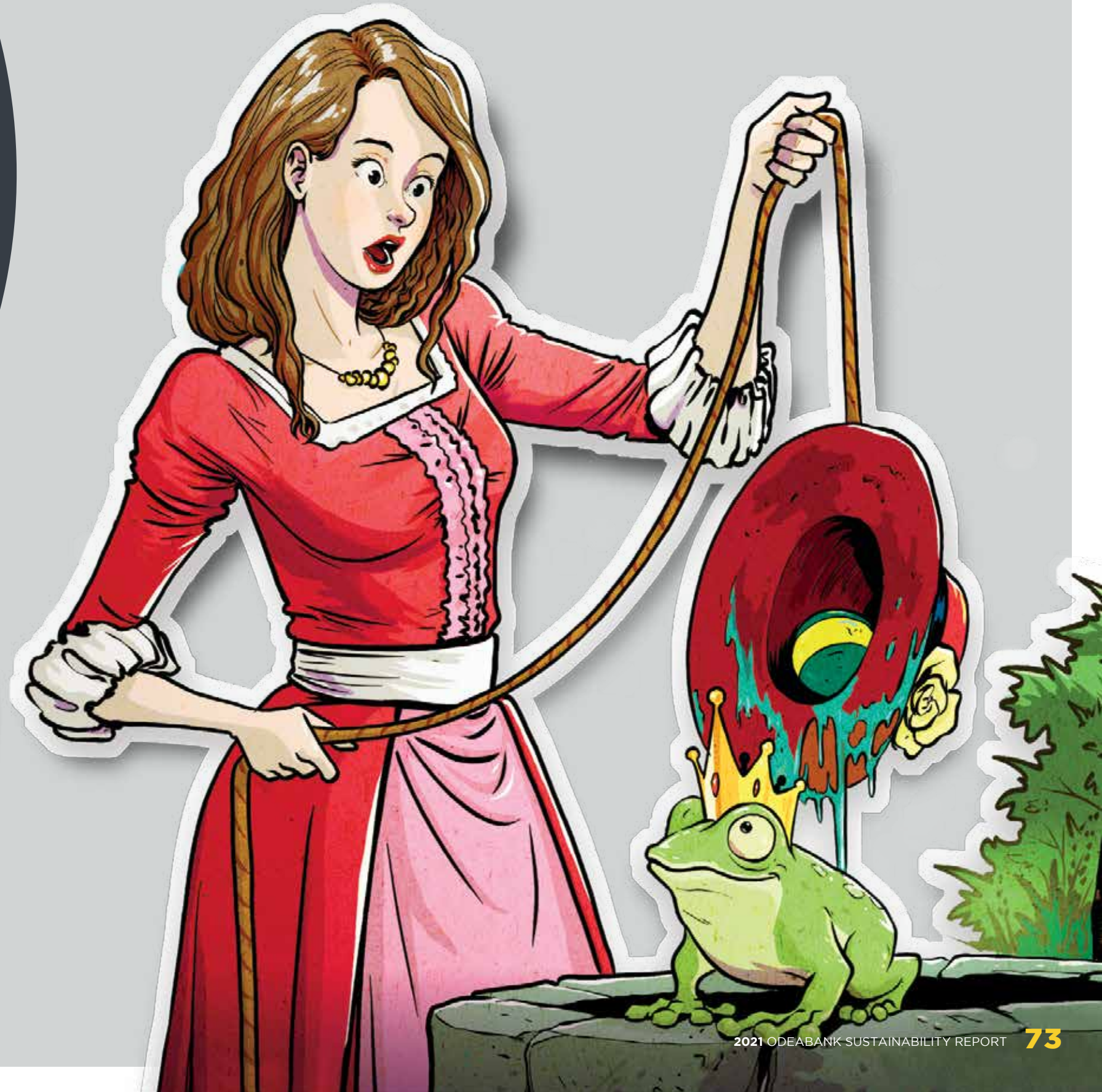
Odeabank succeeded in bringing Eşit Masallar (Fair Tales) books to approximately 50,000 children in 348 schools, 81 of which were in villages.

The Eşit Masallar (Fair Tales) project has won awards in various categories.

We gave away

**310
thousand
books**

Our digital books have been
viewed more than 200
thousand times on
our website.





Studies suggest that the concept of equality and gender bias are learned at a young age and children are confronted with gender norms, the results of which will be seen throughout their lives in their homes, schools and communities, from an early age. With this awareness, Odeabank aims to raise awareness on gender equality in the whole society by reconsidering world-famous fairy tales from an egalitarian perspective with the Eşit Masallar (Fair Tales) project, which it launched in 2020. Believing in an equal future, Odeabank aims to spread an egalitarian understanding among today's children for an equal tomorrow.

Within the scope of the project, the most popular fairy tales were reinterpreted for parents and children, who realize the critical importance of the information learned at childhood in ensuring gender equality. The first phase of the Eşit Masallar (Fair Tales) project, the content advisor of which is Prof. Ayşe Bilge Selçuk and which is carried out in cooperation with Can Publications, focused on rewriting stories such as Little Red Riding Hood, Rapunzel and Cinderella. In the second phase of the project, the stories of Snow White and the Seven Dwarfs and the Frog Prince were reinterpreted, aiming to ensure children adopt an egalitarian approach regarding social roles.

Through the gender equality in social roles approach underlined in the manifesto, world-famous fairy tale protagonists were reinterpreted as the smart and strong Little Red Riding Hood, the bold, daring and free-raised Rapunzel, the smart and curious Cinderella who discovers the world through books, the Frog Prince who chooses goodness and equality, and the Kind Prince, who is strong because of his kind heart and intelligence. Eşit Masallar (Fair Tales), which succeeded in breaking down stereotypical gender norms, was adapted to the theater as a children's play in 2021. The play was staged for the first time in Alan Kadıköy at the 25th İstanbul Theatre Festival, organized by the İstanbul Foundation for Culture and Arts (İKSİV). It reached more than 3000 children through 10 plays until the end of the year.

**Eşit Masallar
(Fair Tales), which
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play in 2021.**



Mediacat Felis Ödülleri'nde 1 Büyük Ödül, 6 Felis ve 5 Başarı olmak üzere, toplam 12 ödüle layık görülen Eşit Masallar projemizde emeği geçen, daha eşit bir gelecek için adım atan herkese teşekkürler.

Mediacat Felis Awards

1. Social Responsibility Section, Achievement Award in the "Children and Youth Projects" Category
2. Social Responsibility Section, Achievement Award in the "Reducing Inequalities" Category
3. Social Responsibility Section, Felis Award in the "Quality Education" Category
4. Branded Content Section, Achievement Award in the "Best Screenplay-Music Match" Category
5. Press Section, Achievement Award in the "Purpose-Oriented Press and Broadcasting" Category
6. PR Section, Felis and Grand Prize in the "Content Production" Category
7. Digital and Mobile Section, Felis Award in the "Holistic Digital Campaign" Category
8. Media Section, Felis Award in the "Reaching Target Audience" Category
9. Transforming Marketing Impact Section, Felis Award in the "Ground-Breaking Projects/Ideas" Category
10. Transforming Marketing Impact Section, Felis Award in the "Positive Social Impact/Social" Category

Stevie International Business Awards

11. Corporate Responsibility – Bronze Award in the Communication or Public Relations Campaign of the Year Category

Social Media Awards Türkiye

12. Gold Award in the "Gender Equality" Category
13. Grand Prix Jury Award

MIXX Award Europe 2021

14. Silver Award in the "Non-Profit Corporate Social Responsibility" Category

PRiDA Communication Awards

15. Strategic Communication Division, Corporate Social Responsibility Communication Award
16. Gender Equality in Communication Special Award



17. Special Awards: Ezber Bozan (Out of the Box) Project Award
18. Special Awards: UNICEF Campaigns That Bring Hope to Children Special Award

Kristal Elma (Crystal Apple) Awards

19. "Film/Online Film" Section, Silver Award in the "Culture, Art, Sports, Event" Category

In 2021, on 3 December International Day of Persons with Disabilities, Odeabank made the Eşit Masallar (Fair Tales) project accessible to all children with visual and hearing impairments by adding audio descriptions, sign language translations and subtitles to the videos in which fairy tales are told, in cooperation with the "Erişilebilir Her Şey" (Everything Accessible) Platform" and published the videos on YouTube.

Odeabank's manifesto for the Eşit Masallar (Fair Tales) project is:

Growing up, we listened to many fairy tales.
Then, as adults, we told those tales to our own kids.
And without realizing, we taught them unequal gender roles by doing so.
Snow White was given an apple by a witch and waited helplessly for a prince's kiss to save her.
Cinderella suffered for a long long time and the only way out was a prince's affection.
Red Riding Hood was naive enough to believe the wolf and ended up being eaten.
Can't we have different tales? Maybe "fair" tales?
Can there be princesses with fierce courage and wits to match and princes who have golden hearts?
Do stepmoms always have to be wicked?
Do princesses have to wait for the princes for their salvation? Is bringing salvation the only duty of princes?
If we change gender roles in fairy tales, the unequal roles in society will change as well.
We believe in an equal future and thus present Fair Tales.

FAIR TALES FROM ODEABANK. LET THE KIDS WAKE UP TO A FAIR FUTURE.



Collaborations, Donations and Sponsorships

Since 2017, Odeabank has been collaborating with the TEMA (Turkish Foundation for Combating Soil Erosion) with the slogan of “The oxygen for the future is guaranteed with the Odeabank Oksijen Hesap”.



Aiming to increase social environmental awareness, Odeabank supports children's nature education as well as

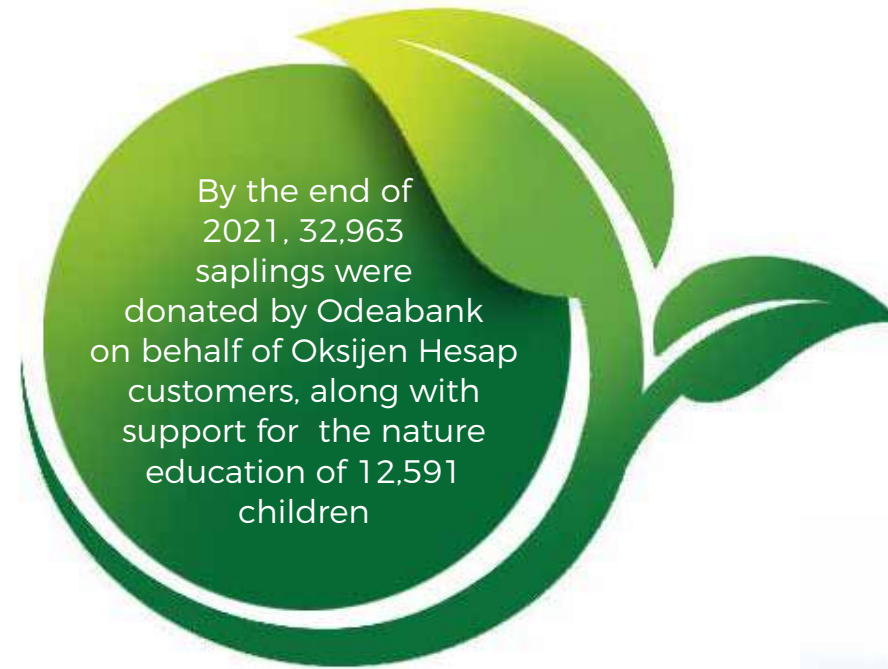
forestation, together with its customers who have an Oksijen Hesap that meet the necessary conditions. Within the scope of this cooperation, contributions are made to the nature education of children or saplings are donated on behalf of Oksijen Hesap holders who meet the necessary conditions. By the end of 2021, 32,963 saplings were donated by Odeabank on behalf of Oksijen Hesap customers, along with support for the nature education of 12,591 children.

In response to a forest fire in Antalya, 5,000 saplings worth TL 50,000 were donated to the TEMA Foundation to support reforestation. In addition, Odeabank, which wants to do more than just celebrate on June 5 World Environment Day, made a special donation to the TEMA Foundation on the said day.

During the forest fires that occurred in many regions of our country in the summer of 2021, Odeabank donated a total of 55,550 saplings, 5 saplings for each employee, to the “1 million saplings” campaign initiated by the Banks Association of Türkiye.



More than 350 Odeabank employees attended Gender Equality Seminars organized in cooperation with “Value for Equality”, an initiative of the Mother-Child Education Foundation (AÇEV). This cooperation with AÇEV and



A donation of TL 5,000 was made to DenizTemiz Association/TURMEPA (Turkish Marine Environment Protection Association), which has been working for the protection of sea and waterways for many years.

the seminars helped Odeabank in setting its targets for gender equality for the future.

In addition, Odeabank, which set out with the intention of doing more than meets the eye for the Eid al-Fitr, supported families in need with a donation of 5,000 TL to LÖSEV.

Odeabank, which participated in the library project of the Süreyya Ağaoğlu Friends of Children Association, which supports children's education and learning, within the framework of the Eşit Masallar (Fair Tales) project, contributed to the establishment of the libraries of 25 village schools by donating a total of 1,000 books. Moreover, with the projects it carried out with LamON9 Social Assistance Association, it brought books to approximately 1,000 students with the support it provided to 10 different village schools. Additionally, through the “What Happened Next?” project by LamON9 Social Assistance Association, of which Odeabank is part, children were asked to write alternative endings for Eşit Masallar (Fair Tales) protagonists and encouraged to think that different gender roles are possible, despite social norms. Studies on critical thinking of gender roles, especially in village schools, and library support are valuable for Odeabank in terms of supporting the education of girls and disadvantaged children.

Within the scope of the cooperation with Boğaziçi University's Technology and Education Laboratory for the Visually Impaired (GETEM), Eşit Masallar (Fair Tales) books were added to the GETEM internet library with

audio descriptions in order to ensure that the project reaches more children. In addition, in cooperation with Her Şey Platformu, tales were made accessible to children with visual and hearing impairments by adding audio descriptions, sign language translation and subtitles to the videos of the Eşit Masallar (Fair Tales) project. This initiative once again showed the major importance Odeabank attaches to equality of opportunity and accessibility as well as gender equality.

Realizing its social investments through sponsorship activities as well as donations, Odeabank has made it its mission to support female athletes by sponsoring the freediving world record holder national diver Şahika Ercümen with Oksijen Hesap. Şahika Ercümen, with the main sponsorship of Oksijen Hesap on the occasion of the 98th anniversary of the Republic dived 100 meters without swimfins and a tube, making headlines in the Turkish and global press as the new holder of the world record, which previously stood at 95 meters. In collaboration with Şahika Ercümen, Odeabank has not only demonstrated its support for women in all areas of society, but also raised awareness on gender equality and environmental protection.



Demonstrating its care for the future generations and education through its activities, collaborations, donations and sponsorships, Odeabank provided a total of TL 344,584 worth of scholarships to 4 persons within the scope of the Odeabank Koç Scholarship program in 2019 and 2020. Continuing the same support in 2021, it offered scholarships to 2 more students. Moreover, with the awareness that public health is an integral part of sustainable development and acting with the aim of creating social benefits,

Odeabank donated TL 1 million to the Ministry of Family, Labor and Social Services in 2020 during the global COVID-19 pandemic.

The collaborations, sponsorships and donations by Odeabank in the last 3 years to create value for the whole society, especially for the disadvantaged and vulnerable, and to protect the nature can be summarized as:

2019

- Support to the Turkish Foundation for Children in Need of Protection
- TCMC (2019 Capital Markets Congress) silver sponsorship
- Music Contest sponsorship
- 4 Team Organizations (Oksijen Hesap, İzmir Children's Festival) sponsorship
- Uniq Expo (Andy Warhol Exhibition) main sponsorship
- EGiAD (Aegean Young Businessmen Association) sponsorship
- Support to Fenerbahçe Sports Club Association
- Hasköy Sports Club sponsorship

2020

- Support to Galatasaray Sports Club Association
- Support to OGEM Foundation
- TEMA Foundation sapling donation
- EGiAD (Aegean Young Businessmen Association 3rd-year sponsorship)
- Support to Turkish Foundation for Children in Need of Protection
- Turismo (Ceren Necipoğlu International Harp Festival) sponsorship
- Hasköy Sports Club sponsorship

2021

- Doğan Burda - Capital 500 session sponsorship
- Mercado Fresh Inspiration Talks sponsorship
- March 8, Women's Day donation to Foundation for the Support of Women's Work
- Uludağ Economy Summit sponsorship
- Ramadan donation to LÖSEV
- Mercado 2nd Term sponsorship
- Aposto sponsorship
- Education donation to TEMA Foundation
- Lamon9 collaboration
- Deniz Temiz Association collaboration
- Donation to TEMA Foundation against forest fires
- TBB afforestation campaign sapling donation
- Mercado Podcast sponsorship
- International Day of the Girl Child donation
- Yanındayız Association sponsorship
- İstanbul Fintech Week sponsorship
- Şahika Ercümen sponsorship
- İTÜ Management Sciences Congress side sponsorship
- İSKV Theatre Fest sponsorship

Memberships

Odeabank cares about being a part of international and national initiatives and institutions that aim to contribute to its own business model and the society as a whole.



Odeabank is a member of TÜSİAD, an organization formed by Türkiye's entrepreneurs and business executives, and YASED, the International Investors Association, which is the representative of international direct investors in Türkiye. In addition, the Bank is a member of the Banks Association of Türkiye (TBB), of which Odeabank CEO Mert Öncü is among the Board Members.

Odeabank is a signatory to the Women's Empowerment Principles (WEPs), the global private sector initiative of the United Nations, which aims to ensure that women

participate in economic life on equal terms and work under fair conditions. WEP, created in cooperation with the United Nations Global Compact (UN Global Compact) and the United Nations Gender Equality and Women's Empowerment Unit (UN Women), guides the private sector and the entire society towards achieving gender equality. With the signature of the Odeabank CEO, the commitments set out in the Women's Empowerment Principles to ensure gender equality throughout the Bank's entire organization were adopted and placed among the Bank's fundamental principles.





VALUE FOR EMPLOYEES

Human Resources Approach

Employee Profile

Performance Management

Training and Capacity Building

Career Support

Inclusion, Opportunity and Gender
Equality

Occupational Health and Safety
(OHS) Approach

HUMAN RESOURCES APPROACH

Odeabank’s Human Resources Policy, underlines the Bank’s goal of having competent employees with a high level of education and experience, thereby achieving high performance.



Odeabank considers the motivation, loyalty and happiness of its 1,111 employees to be its greatest assets, with the vision of “our most important value is our human resources”. Relatedly, it shapes its dynamic and innovative aspect with the importance it attributes to human capital and the opportunities it offers and prepares for a sustainable future.

Effective management of internal relations, implementation of a fair, objective and value-oriented remuneration and reward system without any discrimination, as well as maintaining a human resources-centered business model forms the basis of Odeabank’s Human Resources approach. The fair treatment of employees and the establishment of transparent and open communication are at the

center of this approach. Odeabank’s Human Resources Policy, prepared to this end, underlines the Bank’s goal of having competent employees with a high level of education and experience, thereby achieving high performance. It also aims to have a sustainable corporate structure with the principles of bringing new talents to the Bank and ensuring the continuity of competent human resources, which are emphasized in this policy.

Odeabank Human Resources practices are managed with an approach that supports and develops its employees, encourages teamwork, and enables innovation and continuous development. It is carried out with systematic solutions designed in a modular structure based on scientific methodologies and

complying with the legislation, taking into account the needs of the Bank. Odeabank Human Resources practices, which stand out with their dynamism, have adopted the principle of providing flexible, fast and effective solutions. In addition, Odeabank implements a fair remuneration and reward system for its employees, which are the key elements of its success, taking into account the average wages of the sector, the job size of the positions, the annual performance results of the employees, the internal balances and the annual budget.

The Odeabank Human Resources organization, which consists of Career and Labor Force Management, Human Resources Operations Management and Organizational Development units, carries out internal communication activities that support the mental and physical “well-being” of employees and organizes trainings that help their development. In this context, the “Employee Support Hotline” program, which provides services in many fields from psychological counseling to physical health, was launched and made available for 24/7 use in order to ensure employees’ access to accurate information and to protect their health.

Odeabank, which cares about the “well-being” and health of its employees, organizes social and sports activities for them in order to maintain the balance between work and life outside of work. Founded in 2014, Odeabank Football Team has participated in 7 tournaments so far and finished the Corporate Football League (CFL) in 4th place in 2015. Odeabank Basketball Team, which was founded in 2012 and has joined the Corporate Basketball League (CBL) since then, has succeeded in becoming the Turkish Champion in the competition between approximately 120 corporate companies in the 2016-2017 season. In addition, Odeabank Rowing Team Drag’O has participated in 9 festivals since its establishment in 2014 and won the 1st place trophy at the Dragon festival in September 2017. Founded in 2018, the Odeabank Sailing Team won the 2nd prize in the Jimmy Key Universail Cup 2018 tournament, and the Odeabank Tennis Team won the 1st prize in the Türkiye Interbank Tennis Tournament in 2016 and 2017. The sports teams, activities and tournaments have become

a source of motivation for Odeabank employees. It has also been observed that the awards won at the events boost employees’ loyalty to the Bank, as well as the synergy between the teams.

It is critical for Odeabank to create synergy and increase cooperation among all business units. Human Resources, which want to increase synergy and create a suitable environment to hear the feedback, ideas and suggestions of the employees, make regular visits to all branches and units every year. In addition, with the employee satisfaction survey conducted in 2019, employees’ bond with the Bank and their satisfaction levels were measured and evaluated under the themes of Loyalty, Brand, Senior Management, First Manager, Career & Development, Decision Making, Performance Management, Reward & Appreciation, Collaboration, Empowerment/Autonomy, Business Activities, Infrastructure Opportunities, Diversity & Inclusion, Talent & Staff, Work/Private Life Balance and Customer Focus.

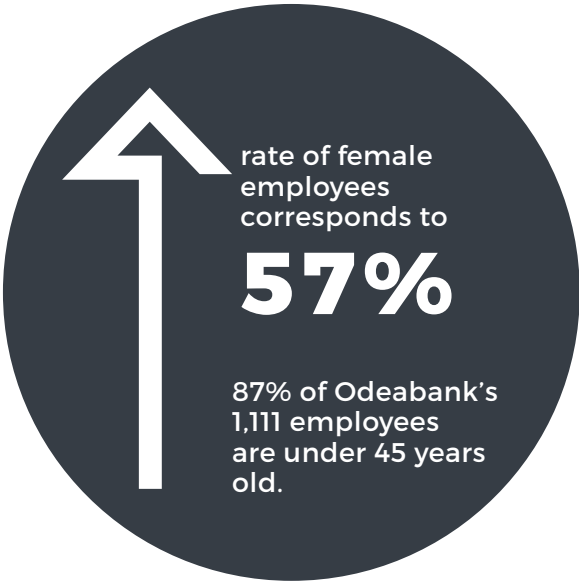
Moreover, employees’ suggestions that could increase internal efficiency or provide added value such as reducing expenses are also collected through the suggestion evaluation platform “Fikriniz Değerleniy’O - FIDE” (Internal Suggestion Platform). If the suggestions are approved by the committees, the employees that put forward the suggestions are rewarded.

Fikriniz Değerleniy’O

Moreover, employees’ suggestions that could increase internal efficiency or provide added value such as reducing expenses are also collected through the suggestion evaluation platform “Fikriniz Değerleniy’O - FIDE”

EMPLOYEE PROFILE

A total of 635 female and 476 male employees work within the Bank, and the rate of female employees corresponds to 57%.



Odeabank has brought together well-educated, innovative employees who follow global developments and technology, are open to learning and enrichment, and open to teamwork. As of 2021, 45% of Odeabank employees work at branches and 55% at the Head Office.

Odeabank, which stands out in the financial sector as a dynamic and innovative bank, has a total of 1,111 employees, 87% of which are under the age of 45. In addition, 74% of Odeabank employees are Generation Y, and the average age of the employees is 37. Approximately 21% of the employees are under the age of 30, eager to learn and open to development. A total of 635 female and 476 male employees work within the Bank, and the rate of female employees corresponds to 57%.

TOTAL WORKFORCE BY AGE GROUP

	18-30	30-45	45+	Total
FEMALE	146	419	70	635
MALE	87	317	72	476

There are 14 persons in Odeabank's Senior Management Structure and 114 persons in the Mid-Level Management Structure. 14% of the Senior Management and 43% of the Mid-Level Management are women.

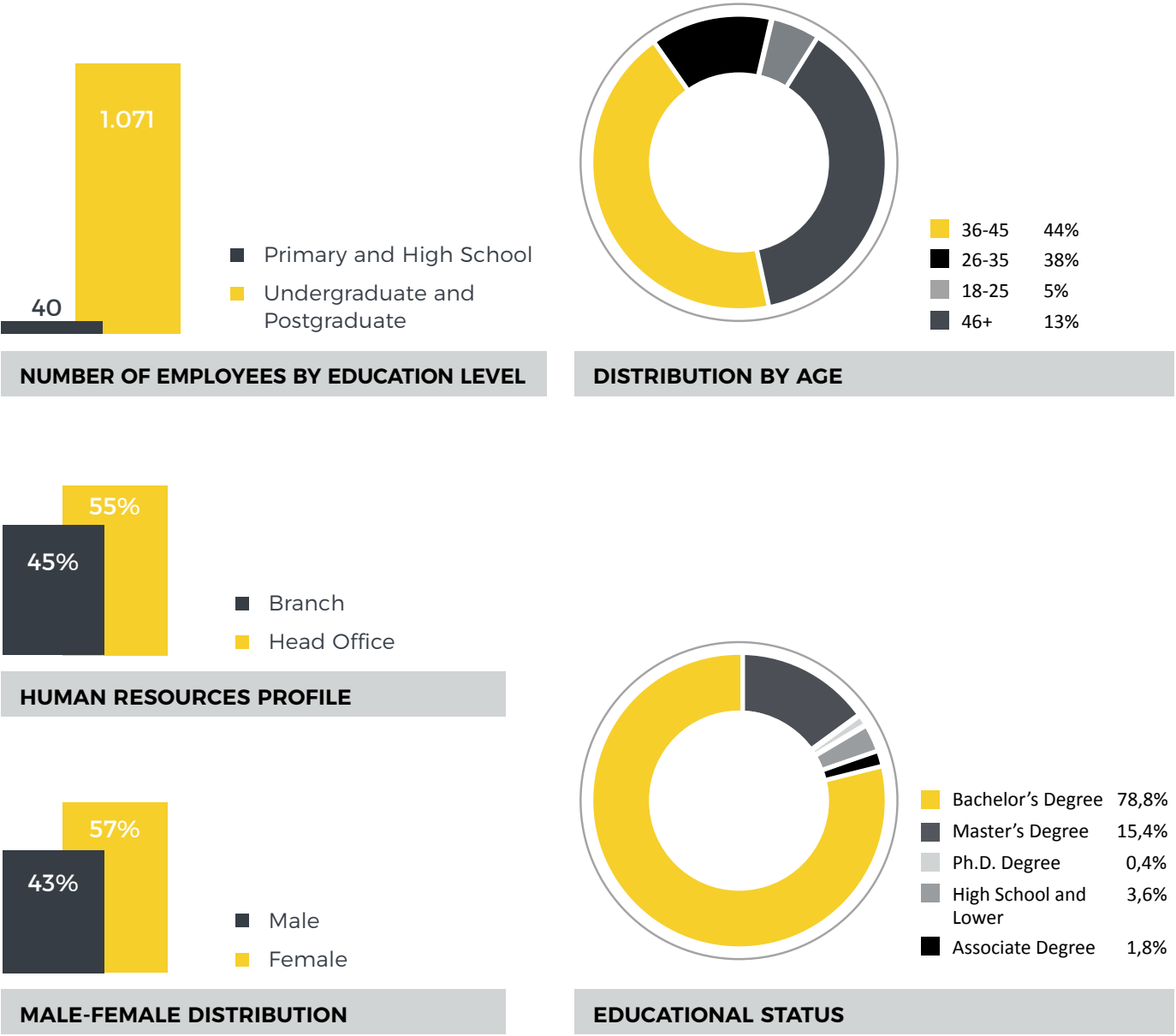
SENIOR MANAGEMENT STRUCTURE

	18-30	30-45	45+	Total
FEMALE	0	0	2	2
MALE	0	3	9	12

MID-LEVEL MANAGEMENT STRUCTURE

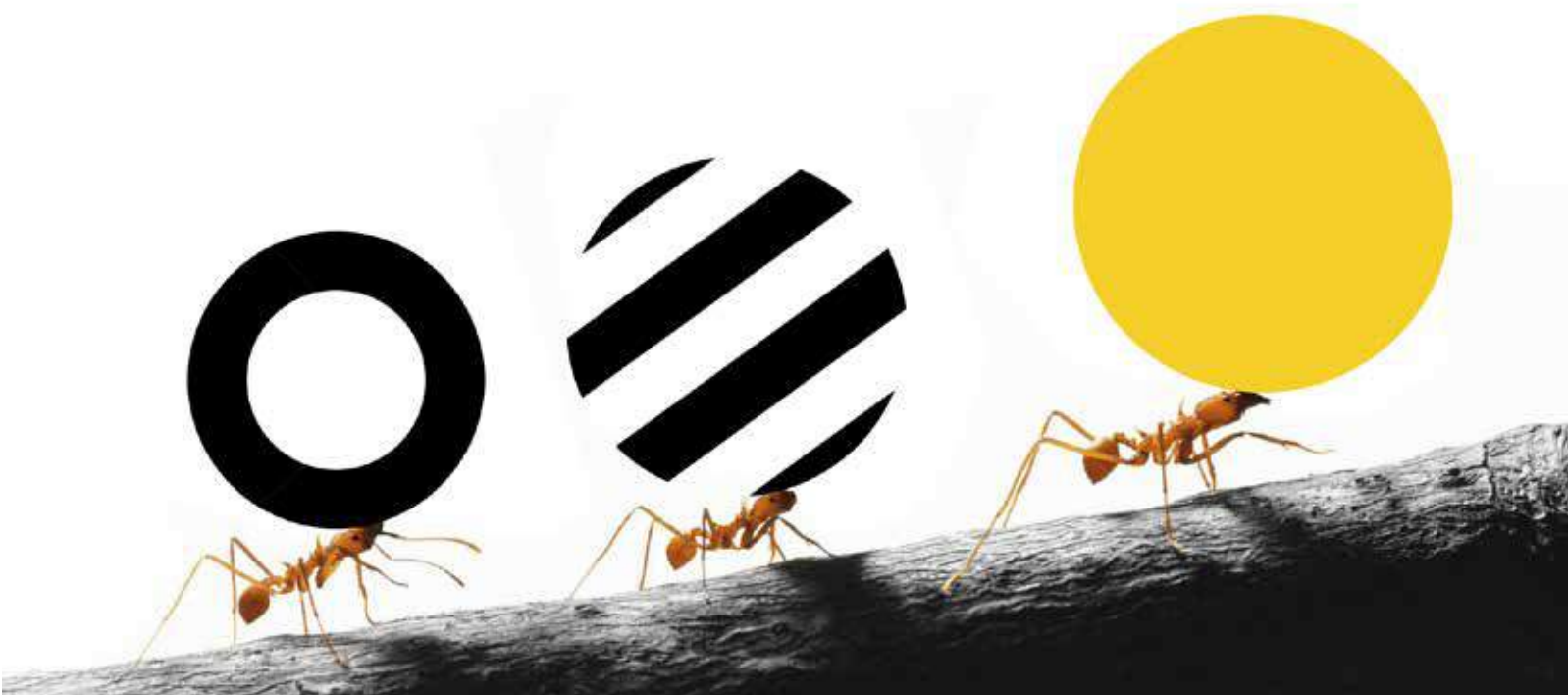
	18-30	30-45	45+	Total
FEMALE	0	19	30	49
MALE	0	39	26	65

More than 96% of Odeabank employees have undergraduate and postgraduate degrees.



At Odeabank, 1,102 employees, corresponding to 93% of total employees, work with indefinite employment contracts and there is no workforce under collective agreement.

PERFORMANCE MANAGEMENT



Employees were evaluated and rewarded with a more accurate, measurable, transparent and egalitarian approach, thanks to the determined performance indicators and digitized metrics.

Adopting the vision of “our most important value is our people”, Odeabank rearranged its goal-setting and follow-up mechanism in 2021 in order to make the performance system more compatible with the management approach aligned with the Bank’s long-term goals. Thus, the target-based performance management system, which was designed with a fair approach, was updated for both Senior Management and branch employees.

Role-based scorecards were prepared for Odeabank Senior Management in line with company goals. While the targets in these cards were determined in a way to

hold Senior Management team personally responsible for the numerical results of the Bank, a segment-based targeting system was implemented for field workers.

Odeabank has ensured that all of its employees carry out their duties in line with the corporate targets with the target-based performance system that it has established, which operates in a fair and systematic manner. In addition, employees were evaluated and rewarded with a more accurate, measurable, transparent and egalitarian approach, thanks to the specified performance indicators and digitized metrics.

TRAINING AND CAPACITY BUILDING

Creating human resources capital with high performance and motivation by supporting the intellectual background and professional development of its employees is one of Odeabank’s most important investments for the future. Considering support to employee development through training and capacity building programs as the key to success, Odeabank offers an environment suitable for continuous learning in line with sustainability, long-term needs and strategic goals. It is believed that these training

opportunities, created in order to contribute to the professional and personal development of the employees, will boost the motivation of the employees as well as the performance of the Bank and also create an efficient working environment. To this end, 874 people attended 29,233 hours of training in 2019, 485 people attended 6,767 hours of training in 2020, and 1,078 people attended 20,145 hours of training in 2021 at Odeabank.

EMPLOYEE TRAININGS	2019		2020		2021	
	Female	Male	Female	Male	Female	Male
White Collar Employees	514 people 14.797 hours	357 people 14.421 hours	293 people 4.369 hours	190 people 2.386 hours	628 people 12.312 hours	438 people 7.694 hours
Senior Management	1 people 14 hours	2 people 1 hours	-	2 people 12 hours	2 people 34 hours	10 people 105 hours
Total	874 people / 29.233 hours		485 people / 6.767 hours		1078 people / 20.145 hours	

In 2021, Odeabank’s training and development strategies were redesigned to serve the Bank’s long-term future goals and to spread the agile learning culture within the organization. In this context, in addition to the technical skills of the employees, seminar series were held to increase their knowledge levels in different disciplines such as culture and arts, psychology, health, parenting, and archeology.

Odeabank, which has moved all trainings to online platforms due to the global pandemic as of 2021, supports the professional development of all its employees with technical and social content through the “e-Odea Human Resources Training Platform”. Measurement and evaluation activities are carried

out in order to tailor the development programs planned to increase the level of knowledge and skills that employees should possess in line with their roles and responsibilities, and to align them with the Bank’s needs. Moreover, the “Internal Trainer Development” program is implemented with the aim of spreading the Bank’s expertise and knowledge to the entire organization in line with the experience and knowledge levels of the employees, and to ensure that the internal trainings meet certain standards.

In addition to the formal technical trainings provided to employees, Odeabank also contributes to informal learning processes with the method of learning from each other in order to develop a culture of learning

within the organization. It also supports the learning processes within the organization with the mentoring programs it has developed. The Vide’O platform, which includes short and instructive videos shot by Odeabank employees as well as seminar recordings, was offered to employees as an interactive social learning tool. In

addition, Odeabank employees’ personal development needs are determined at quarterly intervals through the Banks Association catalogue, and opportunities are provided for them to participate in personal and technical trainings.

CAREER SUPPORT



Odeabank, which favors success-oriented, dynamic, innovative, competitive and socially sensitive people in its recruitment processes, provides vertical and horizontal advancement opportunities for its employees in line with their competencies and responsibilities during their tenure. In this context, Odeabank employees are offered consultancy services and personal development opportunities suited to their expertise. These opportunities include filling vacant or newly opened positions from within the Bank through internal announcements and offering new career options to employees. To this end, applications for 32 internal postings shared during the year were evaluated, and different career opportunities were provided for 24 employees.

Within the framework of the Odeabank Leadership Program (O’lider-O’Leader), designed to support the competencies and potentials of managers who will

carry Odeabank to the future, development plans and training programs are implemented for managers in cooperation with Turkey’s leading educational institutions and universities. In addition, the career journeys of employees working in the field are supported with the mentoring program commissioned for portfolio managers in cooperation with Retail-Private Banking and Commercial Banking business lines.

Odeabank’s social investments for the future generations include internship opportunities created for young people to gain professional experience and prepare them for business life. Generally, long-term interns are recruited with the aim of enabling young talents to experience business life and bring them into Odeabank. Employment opportunities are provided to the interns in line with the needs arising in the departments they work in.

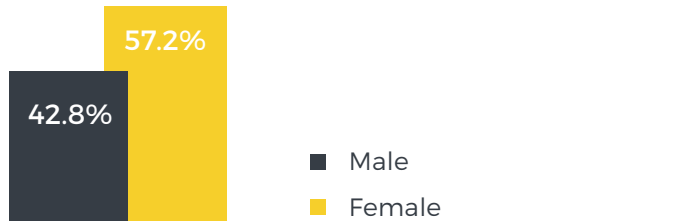
INCLUSION, OPPORTUNITY AND GENDER EQUALITY

The business world creates significant social effects that start with its own employees in the working environment and spread to the whole society outside the working environment. Increasing the ratio of female employees by eliminating gender inequality in the working environment of companies and providing equal opportunities for everyone without any discrimination not only improves the performance of companies, but also increases the welfare of the society outside the working environment and supports sustainable development. In addition, companies with both gender and ethnic diversity are known to perform better.

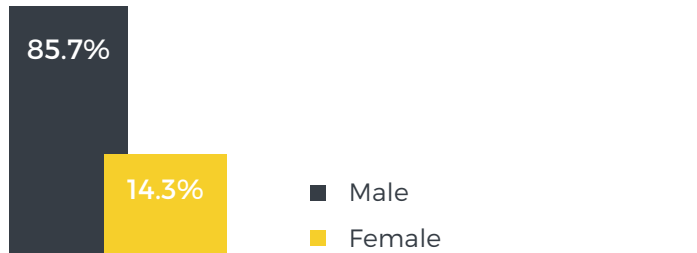
Equality is at the center of Odeabank’s social responsibility projects and sponsorships aimed at creating social value, as well as the Bank’s operating model and policies towards its own employees. As emphasized in Odeabank’s Human Resources Policy, employees are not discriminated against due to religion, language, race, gender, age, marital status and physical appearance, with the principles of honesty and integrity at the center of all employee relations. In addition to providing equal opportunities to employees, gender equality is also among the basic working principles of Odeabank. Within the framework of this principle, fair and equitable working opportunities are offered to all Odeabank employees, men and women.

Believing that conditions enabling women and men to realize their full potential should be created for strong societies and economies, Odeabank has 1,111 Odeabank directly employed employees as of 2021, of whom are 635 women and 476 men. In other words, 57% of Odeabank employees are women.

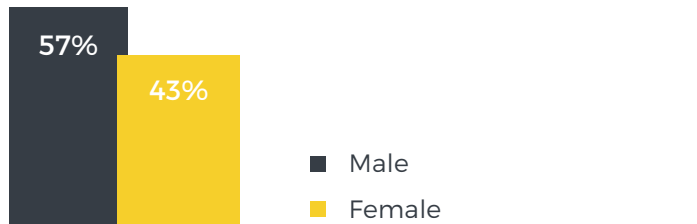
In addition, women account for 14.3% of senior management and 43% of mid-level management.



TOTAL WORKFORCE BY GENDER



RATIO OF WOMEN IN SENIOR MANAGEMENT



RATIO OF WOMEN IN MID-LEVEL MANAGEMENT

Odeabank has managed to maintain the ratio of female employees at high levels in the past 3 years.

TITLE GROUP

Number of Female Employees

	Senior Management	Supervisors and Higher Executives	White Collar Employees	Total
2019	2	134	497	633
2020	2	128	502	632
2021	2	129	504	635

Odeabank attaches importance to the participation of young women in economic life and offers opportunities within the framework of the principle of equality. While 23% of the women working at the Bank are under the age of 30, 89% are under the age of 45.

FEMALE WORKFORCE BY AGE GROUP

	18-30	30-45	45+	Total
2021	146	419	70	635

Working towards raising awareness and sensitivity, which is one of the important steps towards achieving gender equality, Odeabank included its employees in Gender Equality Seminars in cooperation with the

Mother-Child Education Foundation (AÇEV) initiative, “Value for Equality”. Subsequently, the Gender Equality (GE) Working Group, which was formed within Odeabank, worked for 8 months after obtaining detailed

information on the subject thanks to the 6 trainings it received, and put forward actions for gender equality in the fields of Human Resources practices, products and services, internal and external communication. In the light of the seminars, the GE Working Group composed of volunteers determined Odeabank's goals include raising employees' awareness on gender equality as well as taking necessary actions to ensure gender parity.

Creating opportunities for its female customers as well as its employees and empowering them in economic life is a valuable step in Odeabank's sustainability journey. Odeabank, which conducted the Women's Savings Habits Survey to examine women's saving tendencies and investment habits before and after the pandemic in Türkiye, carries out studies to meet the expectations and needs of its female customers.

For Odeabank, inclusiveness and equality bring along the principle of being an accessible bank for everyone. Having maintained the ratio of employees with

disabilities at over 2% in the last 3 years, Odeabank aims to increase the ratio of employees with disabilities to 4% in 2022.



TITLE GROUP

Ratio of Employees with Disabilities

	Senior Management	Supervisors and Higher Executives	Employees
2019	-	2	27
2020	-	1	28
2021	-	2	24

In addition, "barrier-free communication" and "sign language" trainings are given to Odeabank Communication Center and branch employees in order to strengthen communication with customers with disabilities. Within the scope of accessibility, 296 Odeabank employees participated in these online trainings in 2021, and participation in the trainings was regularly monitored and reported.

In case of any discrimination, which is contrary to the principles specified in the Odeabank Human Resources Policy, the discriminating person is sanctioned within the scope of the Disciplinary Committee practices within the framework of the Code of Ethics. There were no discrimination incidents in 2021.

OCCUPATIONAL HEALTH AND SAFETY (OHS) APPROACH

Odeabank takes every precaution to ensure the health and safety of its employees, subcontractors and visitors in its working environments, in accordance with the current OHS regulations and OHS requirements.



In line with the value it places on human capital, it is of great importance for Odeabank to protect the health and well-being of all employees, to create a safe working environment and to implement all necessary measures.

Odeabank established an OHS Management System to ensure employee health and safety. In its OHS Policy prepared in this direction, Odeabank takes every precaution in order to ensure the health and safety of employees, subcontractors and visitors in the working environment, in accordance with the OHS regulations and OHS requirements, and to prevent unsafe situations and actions that may cause work accidents

and occupational diseases and undertakes to eliminate any possible accident risks by detecting them in advance through efficient risk assessment. In addition, studies are carried out to train employees in the field of OHS, to ensure that they have sufficient awareness on the subject and to encourage their participation in OHS processes.

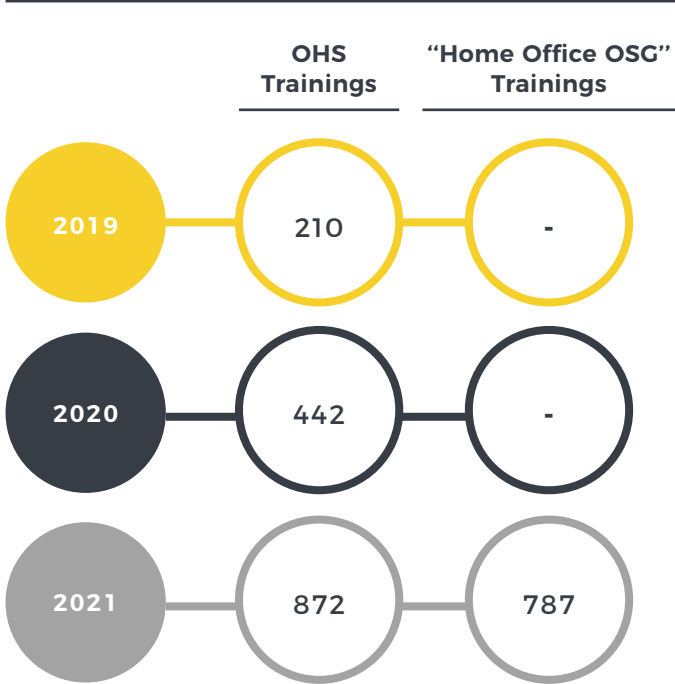
Occupational Health and Safety training is provided for all newly recruited employees at Odeabank. These trainings are monitored and regularly reported with the coordination of the OHS Officer and the Human Resources Training team. Employees who complete the training are issued a training certificate and its validity

is monitored within the legal period. OHS trainings given face-to-face in the pre-pandemic period were taken to the online platform because of the global pandemic. In addition, due to the increase in the number of people working from home because of the mandatory shutdowns due to the pandemic in 2021, the "Home Office OHS" training format was prepared and presented to Odeabank employees to complement the standard OHS trainings. In 2021, 872 employees and managers attended the OHS trainings provided by the Bank, and 787 employees and managers attended the Home Office OHS trainings.

The aim of the OHS trainings held within the scope of training programs that are reorganized every year is to prevent possible occupational diseases and work accidents. In cases where personal protective equipment is required, it is ensured that employees use personal protective equipment, and in case of a work accident, a report is prepared and the Social Security Institution (SGK) is notified within 3 days. There were no occupational accidents at the Bank in 2020 and 2021. In addition to employees, it is ensured that subcontractors serving the Bank as well as visitors act in accordance with the specified OHS rules.

Within the scope of OHS efforts, a project to monitor OHS studies has been initiated through the software program called Worksafe, and it is planned to follow all OHS activities on the platform in the future. In addition, Odeabank employees can share their questions and problems regarding physical and psychological health issues with experts and receive the support they need through the "Employee Support Hotline", which is open 24/7.

Number of Employees who Received OHS Training



24/7

"Employee Support Hotline"

Odeabank employees can share their questions and problems regarding physical and psychological health issues with experts and receive the support they need.

COVID-19 Approach

With the outbreak of the COVID-19 global pandemic, the health and safety of employees and their families has become a critical issue for Odeabank. In this context, the emergency action plan was quickly put into use, employees with special health conditions were prioritized and a transition to remote working was made. In order to protect the safety of employees and customers at Odeabank branches, necessary measures were taken to minimize physical contact. Branch employees carry out their activities in a hygienic working environment with rotation and minimum staff. As of April 2022, a hybrid working model has been implemented for both the Head Office and branch teams.

From the first days of the global pandemic, employees have been informed and guided about preventing the spread of the pandemic and ways of staying protected. In addition, necessary controls are made to ensure that the pandemic rules are implemented by employees and customers in order to maintain physical distance and reduce the risk of contamination.

During the COVID-19 global pandemic, the “EsniyO” (Work “O”ut) program was implemented in order to support the physical and mental well-being of employees, and they were encouraged to participate in sports activities accompanied by pilates instructors. Caring about the well-being and motivation of its employees, Odeabank aimed to reduce the negative impact of the global pandemic on employees with this 4-week program.

By integrating Odeabank’s Card-Pass System with the Ministry of Health’s (HES-Vaccination) system, the health status of the employees was monitored daily and get well soon packages were sent when necessary.

With the same system, HES codes were defined in the card-pass system, the health risks of the employees were monitored and efforts were made to minimize contamination. During this period, psychological and physical health support was provided to Odeabank employees in need through the “Employee Support Hotline”, which is open 24/7.

During the COVID-19 global pandemic, Odeabank aimed to contribute to the health of its employees and customers, as well as the entire community, with a donation of TL 1 million to the Republic of Türkiye Ministry of Family, Labor and Social Services.



There's a world where there's
no unconscious consumption



07

VALUE CHAIN MANAGEMENT

Supply Chain Management

Customer Satisfaction
Approach

Cooperation with International
Financial Institutions

Odeabank is aware of the importance of acting in cooperation with all its stakeholders in the value chain in order to maintain a sustainable and beneficial business model and increase satisfaction rate. It has undertaken to make a positive impact on the entire value chain with its social responsibility activities and responsible procurement approach.

In addition to its shareholders, Odeabank has identified its stakeholders as employees, customers, public institutions and law-maker bodies. It shapes its direct or indirect communication activities with these stakeholders within the framework of legal or internal regulations at certain periods or according to needs. Communication methods are:

STAKEHOLDERS	COMMUNICATION METHOD
Employees	E-mail, 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
Customers	Customer satisfaction surveys E-mail, phone and face-to-face meetings Customer visits and meetings Exhibitions, conferences, fairs Website News Social media Request/complaint sites
Public Institutions and Law-Maker Bodies	Periodic reporting Meetings and conferences E-mail, phone and face-to-face meetings Audits

SUPPLY CHAIN MANAGEMENT

The Internal Services and Banking Support Department, which manages the supply of goods and services within Odeabank, prefers suppliers that comply with the Bank’s ethical principles and provide a competitive advantage. In the purchasing processes realized in accordance with the Bank’s Goods and Services Procurement Procedure, in addition to goods and services, suppliers are also subject to risk assessment.

Odeabank is a precious metals intermediary institution operating in the Borsa İstanbul Precious Metals Market, acting on the principle of compliance with the Exchange regulations, international standards, procedures and principles. Accordingly, it has established its own precious metals responsible supply chain compliance program.

CUSTOMER SATISFACTION APPROACH

Even under the rapidly changing global conditions and the challenging aspects of the pandemic, Odeabank has focused on developing services that meet the preferences and expectations of its customers by recognizing their needs in advance. Odeabank works to ensure that customers have easy access to its services and products, and to meet the financing needs of all segments of society in a fast and reliable manner. To this end, it considers the preferences and expectations of its customers to be the most important factors that lead to innovative and sustainable growth. Odeabank

has received many awards for its improved customer experience, innovative structure and efficient customer service. A full list of the awards received can be found under “3.7. Achievements and Awards”.

Odeabank receives feedback from its customers at regular intervals through customer satisfaction surveys. Known as the customer-centered and dynamic bank of the banking sector, Odeabank has achieved successful NPS points in terms of “Perfect Customer Experience”.

Customer Notifications Management Procedure

Odeabank, which is willing to continuously increase the level of customer satisfaction, values the notifications received from customers. Customers can submit their suggestions, requests, complaints and objections via the Odeabank website, branches, digital channels, social media accounts, e-mail, mail, fax, Head Office telephone, official institutions’ websites and other social media channels. All notifications received by the Bank are reviewed and finalized within the framework of the Customer Notifications Management Procedure, customers are responded to through the channels they prefer, and when necessary, the matter is shared with

the Internal Audit Department for further analysis. Odeabank evaluated and resolved 46 complaints from its customers in 2019 and 3 complaints in 2020 within the scope of Customer Notifications Management. In 2021, there were no complaints received by the Bank thanks to the development of effective channels and the improvement of customer experience through fast solutions. Considering being a customer-friendly bank among its values, Odeabank aims to maximize its process improvement efforts in the upcoming period in order to shorten the duration of its services while increasing the quality.

COOPERATION WITH INTERNATIONAL FINANCIAL INSTITUTIONS

 The International Finance Corporation (IFC), the IFC Financial Institutions Growth Fund (IFC FIG Fund) and the European Bank for Reconstruction and Development (EBRD), members of the World Bank Group since 2016, are shareholders of Odeabank.

 The Bank takes as an example the sustainability approach and good practices of its shareholder, IFC, in order to eliminate or mitigate the negative effects that may arise from lending activities. Odeabank has prepared the Prohibited Activities List based on the IFC Prohibited Activities List and monitors the projects in line with the IFC Performance Standards.

The Bank offers innovative solutions by collaborating with international financial institutions and ensures capacity building in environmental and social issues. For example, with the cooperation of institutions such as IFC, Finance in Motion (advisor to the Green for Growth Fund (GGF) and the European Fund for Southeast Europe (EFSE)), and the Banks Association of Türkiye, trainings aiming at raising environmental and social awareness are organized at the Bank.

Odeabank supports micro- and small-scale enterprises operating in Türkiye and renewable energy projects with the loans obtained from EFSE, which aims at promoting economic development and prosperity, and GGF, which aims at mitigating climate change and promoting sustainable economic growth in target regions, including Southeast Europe. Within the scope of the cooperation with the GGF, Odeabank can measure the energy efficiency and carbon emissions of the projects it finances, with the support of technical assistance provided in tandem with GGF financing, including the support to develop this Sustainability Report, as well as trainings and reporting support.





DIGITALIZATION AND INNOVATION EFFORTS

Digital Banking
Innovative Services and Products
Technology and Operations

DIGITAL BANKING

Odeabank has become one of the banks to quickly adapt to the global pandemic and the new normal after it, thanks to its pioneering technology and applications in the field of digital banking.



The use of technology and the trend of digitalization in banking activities are becoming more and more widespread, changing the business models of banks. They also shape the expectations of customers and increase the need for effective digital channels. In line with these developments, Odeabank has adopted a new vision and mission that focuses on sustainable, innovative solutions and digitalization.

Odeabank's digital working model was announced in April 2021. Established in line with the model, the Odeabank Digital Banking Department consists of four main units: Digital Services, Digital Transformation Office, Customer Experience and Design, and Digital

Marketing. Odeabank Digital Services operates to provide its customers with an uninterrupted, easily accessible, personalized and integrated experience through digital touch points (mobile, internet branch, ATM) in line with the Bank's strategies and objectives. The Digital Transformation Office is responsible for determining, implementing and monitoring the roadmap for the Bank's digitalization. The Customer Experience and Design Unit works to improve customer experience and increase interaction with innovative services tailored to their needs. Odeabank Digital Marketing Unit, on the other hand, carries out activities within the Bank regarding the determination and monitoring of digital metrics and targets.

Odeabank has become one of the banks to quickly adapt to the global pandemic and the new normal after it, thanks to its pioneering technology and applications in the field of digital banking. Making

technological investments by creating effective digital channels, Odeabank aims to develop and expand these channels and continuously increase efficiency.

For Odeabank, the 3 main business objectives regarding digitalization are:

1

To become the leader of "phygital" (new products and services formed by the combination of physical personal touch and digitalization) investments in retail banking in Türkiye

- The aim is to both open new doors to customers and enhance their current experiences by improving the existing force of customer representatives with new digital products and services to support the concept of phygital.

2

Leveraging digital opportunities in core banking services and operations

- In order to improve and renew the digital experience currently offered to customers, efforts are made to digitize basic banking and operations.
- Within the scope of the digitalization of branches, efforts are made to strengthen existing relations with customers and to support customer representatives with artificial intelligence-based models in investment issues for new value propositions to be presented to customers.

3

To become the bank to have the best digital working methods in its class, together with all employees

- The teams established in order to realize the agile cultural transformation within the organization continue to work in accordance with agile methods. It is aimed to create a customer-oriented culture within the Bank that is open to experimentation, discovery and feedback.

Odeabank measures its innovation practices with 3 key performance indicators through the digital channels it has developed. These indicators were determined as follows:

1

NPS score and customer satisfaction,

2

Increasing financial activity in mobile/digital channels,

3

Customer acquisition and retention.

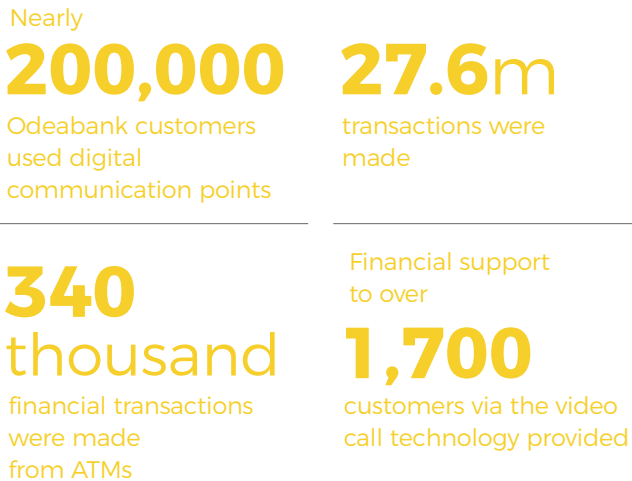
INNOVATIVE SERVICES AND PRODUCTS

In 2021, nearly 200,000 Odeabank customers used digital communication points, and a total of 23.2 million transactions were made through these channels.

In order to increase financial participation and accessibility, Odeabank enables account opening via digital channels with video calls without the requirement of original signature and branch visits. In this way, it has managed to reach every segment of the society in need of financing, without risking the health and safety of the society and its employees during the global pandemic. In 2021, nearly 200,000 Odeabank customers used digital communication points, and a total of 27.6 million transactions were made through these channels. On the other hand, 88.4% of transactions made through digital channels were realized through the mobile platform. As part of its digitalization efforts, Odeabank offers its customers the opportunity to perform their precious metal/silver purchases and sales transactions via mobile and internet branches without going to the branch. Plus, the Odeabank mobile application was downloaded more than 85,000 times and provided financial support to over 1,700 customers via the video call technology.

Odeabank brings together digital platforms and the approach of creating value for the society. It plans to increase financial literacy and create value for the society with the financial literacy trainings it will provide through its new mobile application. With the videos to be uploaded onto this application, it aims to increase the level of awareness about the basic concepts of banking, savings principles and investment products. At the same time, our plans include to develop products for children and to support the increase of financial literacy by involving them in financial matters from a young age.

Odeabank has developed the "Medical Doctors Package" and offered this package to healthcare professionals, which includes many advantages that will make the lives of doctors easier. In addition, the "Kazandırıy'O" (Add "O'n) mobile application, which makes banking transactions profitable, offers all customers and non-customers the opportunity to earn bonuses, special discounts and rewards while performing banking transactions, in addition to offering many features that make their lives easier. Oksijen Hesap, offered to customers who want to invest in their savings on a daily basis with its daytime and nighttime structure, is an innovative product that minimizes customers' premature withdrawal concerns.



TECHNOLOGY AND OPERATIONS

Focusing on providing uninterrupted service in line with technological advances and developments in legal regulations, Odeabank offers solutions for its customers to perform their transactions faster and easier. At the same time, it implements many technological investments in order to continuously improve the customer experience on digital platforms.

At Odeabank, the Technology and Operations Unit ensures that all transactions are carried out uninterruptedly, especially in the main banking system, within the framework of the determined regulations and rules.

Information Technologies

It is important for Odeabank that the hardware and technical infrastructure of all applications offered to its customers are uninterrupted 24/7, and the necessary infrastructure for this is developed thanks to the Information Technologies Unit. In 2021, it was decided to carry out the software development activities with the internal resources of the bank, and in this direction, the Digital Banking Software Development Unit within Odeabank became operational.

In 2021, efforts were made to renew existing systems in a way that would provide technology development, performance increase and cost advantage, together with consolidation and transformation projects, and

great gains were achieved. For example, the FAST application, which allows 24/7 money transfer, and the Remote Customer Acquisition process through Mobile Banking were introduced. In addition, efforts were undertaken to monitor the instant changes of the data of the banking system and to transfer them to other systems. The aim is to pursue these technology efforts, which increase efficiency and performance, in 2022 as well. In order to update the technology of digital channels and enrich them with new investment products and features, the project to renew the existing mobile banking application was initiated. With the project, which is planned to be implemented in 2022, it will be possible to act more agile in digital channels.

Information Security

With the developing technology, information assets may face cyber threats and attacks, and banks need to take additional measures to ensure the security of their information assets. With an effective risk management approach, Odeabank has developed measures to protect its information systems, information infrastructure, data and related processes against cyberattacks. It works on increasing the capacity of human resources as well as developing processes and technologies to protect information assets.

In 2021, activities were carried out to improve the Cyber Incident Management infrastructure, which allows detecting, reporting and responding to cyber threats. Test studies were carried out for cyber incident management processes. In addition, Odeabank continues to develop security measures at ATMs and against various card cloning attacks by using the power of its technological infrastructure.

Operational Efficiency

The integration of processes into the system was increased by making system updates focused on customer satisfaction and prioritizing risk-based developments in order to ensure high quality, error-free and quickly completed transactions at Odeabank in 2021. By making use of technology, operations were rendered more effective, efficient and faster, and

significant savings were achieved in labor and material resources. Studies were carried out on the conversion of printed statements to e-statements, and necessary actions were taken to reduce the use of paper in an environmentally friendly manner. Most of the printed documents were transferred to the digital environment, thus saving paper.



GRI 1

Odeabank has reported in accordance with the GRI Standards for the period January-December 2021.

For the Content Index – Essentials Service, GRI Services reviewed that the GRI Content Index is clearly presented, in a manner consistent with the Standards, and that the references for disclosures 2-1 to 2-5, 3-1 and 3-2 are aligned with the appropriate sections in the body of the report.

GRI STANDARD	DISCLOSURE	PAGE NUMBERS, EXPLANATIONS AND/OR URL	OMISSIONS
GRI 1: FOUNDATION 2021			
GRI 2: GENERAL DISCLOSURES 2021			
GRI 2: General Disclosures 2021	2-1 Organizational details	About the Report, p.4 About Odeabank, p.10	-
	2-2 Entities included in the organization's sustainability reporting	About the Report, p.4	-
	2-3 Reporting period, frequency and contact point	About the Report, p.4	-
	2-4 Restatements of information	This report is the first sustainability report of Odeabank.	-
	2-5 External assurance	No external audit was conducted within the scope of the report.	-
	2-6 Activities, value chain and other business relationships	Corporate Profile, p.12 Capital and Shareholding Structure, p.16 Operating Regions (Branches), p.18 Products and Services, p.22 Memberships, p.81 Value Chain Management, p.100	-
	2-7 Employees	Corporate Profile, p.12 Employee Profile, p.86	-
	2-8 Workers who are not employees	No external employee works in Odeabank.	-
	2-9 Governance structure and composition	Corporate Profile, p.12 Organizational Structure and Senior Management, p.34 Committees, p.39 Sustainability Management Structure, p.50	-

GRI 2: General Disclosures 2021	2-10 Nomination and selection of the highest governance body	Confidentiality constraints Odeabank, does not share this information publicly in accordance with the institution's privacy policies.	-
	2-11 Chair of the highest governance body	Organizational Structure and Senior Management, p.34	-
	2-12 Role of the highest governance body in overseeing the management of impacts	Committees, p.39 Sustainability Management Structure, p.50	-
	2-13 Delegation of responsibility for managing impacts	Sustainability Management Structure, p.50 Management of Environmental and Social Risks due to Lending Activities / ESMS, p.56	-
	2-14 Role of the highest governance body in sustainability reporting	Sustainability Management Structure, p.50	-
	2-15 Conflicts of interest	Code of Ethics, p.33	-
	2-16 Communication of critical concerns	Risk Management Approach, p.44 No critical issue occurred during Odeabank's reporting period.	-
	2-17 Collective knowledge of the highest governance body	Organizational Structure and Senior Management, p. 34	-
	2-18 Evaluation of the performance of the highest governance body	Confidentiality constraints Odeabank, does not share this information publicly in accordance with the institution's privacy policies.	-
	2-19 Remuneration policies	Corporate Governance Principles and Policies, p.30 Human Resources Approach, p.84	-
	2-20 Process to determine remuneration	Corporate Governance Principles and Policies, p.30 Human Resources Approach, p.84	-
	2-21 Annual total compensation ratio	Confidentiality constraints Odeabank, does not share this information publicly in accordance with the institution's privacy policies.	-
	2-22 Statement on sustainable development strategy	Sustainability Approach, p.46 SDG Map of Activities, p.53	-
	2-23 Policy commitments	Corporate Governance Principles and Policies, p.30 Code of Ethics, p.33	-

GRI 2: General Disclosures 2021	2-24 Embedding policy commitments	Corporate Governance Principles and Policies, p.30 Code of Ethics, p.33	-
	2-25 Processes to remediate negative impacts	Risk Management Approach, p.44 Respect for the Environment, p.54 Community Relations, p.62 Corporate Social Responsibility Approach, p.70 Customer Satisfaction Approach, p.103	-
	2-26 Mechanisms for seeking advice and raising concerns	Code of Ethics, p.33 Internal Systems, Legislation and Compliance, p.42 Customer Satisfaction Approach, p.103	-
	2-27 Compliance with laws and regulations	Code of Ethics, p.33 Internal Systems, Legislation and Compliance, p.42	-
	2-28 Membership associations	Memberships, p.81	-
	2-29 Approach to stakeholder engagement	Collaborations, Donations and Sponsorships, p.78 Human Resources Approach, p.84 Value Chain Management, p100.	-
	2-30 Collective bargaining agreements	Odeabank does not have a workforce under a collective agreement.	-

MATERIAL ISSUES			
GRI STANDARD	DISCLOSURE	PAGE NUMBERS, EXPLANATIONS AND/OR URL	OMISSIONS
GRI 3: MATERIAL TOPICS 2021			
Material Topics			
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Materiality Analysis, p.52	-
	3-2 List of material topics	Materiality Analysis, p.52	-
	3-3 Management of material topics	Materiality Analysis, p..52	-
GRI 200: ECONOMIC STANDARDS SERIES			
Capital Adequacy and Financial Performance			
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Corporate Profile, p.12	-
	3-2 List of material topics	Corporate Profile, p.12	-
	3-3 Management of material topics	Corporate Profile, p.12	-

GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	Corporate Profile, p.12 Corporate Social Responsibility Approach, p.70	-
	201-2 Financial implications and other risk and opportunities due to climate change	Sustainability Strategy/Policy, p.48	-
GRI 203: Indirect Economic Impacts 2016	203-2 Significant indirect economic impacts	Respect for the Environment, p.54 Innovative Services and Products, p.110	-
Responsible Financing and Sustainable Growth			
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Corporate Profile, p.12 Products and Services, p.22	-
	3-2 List of material topics	Corporate Profile, p.12 Products and Services, p.22	-
	3-3 Management of material topics	Corporate Profile, p.12 Products and Services, p.22	-
Financial Literacy			
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Products and Services, p.22 Digitalization and Innovation Efforts, p.106	-
	3-2 List of material topics	Products and Services, p.22 Digitalization and Innovation Efforts, p.106	-
	3-3 Management of material topics	Products and Services, p.22 Digitalization and Innovation Efforts, p.106	-
Financial Inclusion			
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Products and Services, p.22 Digitalization and Innovation Efforts, p.106	-
	3-2 List of material topics	Products and Services, p.22 Digitalization and Innovation Efforts, p.106	-
	3-3 Management of material topics	Products and Services, p.22 Digitalization and Innovation Efforts, p.106	-
Ethics, Compliance with Laws and Anti-Corruption			
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Code of Ethics, p.33 Sustainability Strategy/Policy, p.48	-
	3-2 List of material topics	Code of Ethics, p.33	-
	3-3 Management of material topics	Code of Ethics, p.33	-

GRI 205: Anti-Corruption 2016	205-1 Operations assessed for risks related to corruption	Code of Ethics, p.33	-
	205-2 Communication and training about anti-corruption policies and procedures	Code of Ethics, p.33	-
	205-3 Confirmed incidents of corruption and actions taken	Code of Ethics, p.33	-
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.	-
GRI 300: ENVIRONMENTAL STANDARDS SERIES 2016			
Combating Climate Change and its Financing			
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Sustainability Strategy/Policy, p.48 Management of Direct Environmental Impacts, p.58	-
	3-2 List of material topics	Sustainability Strategy/Policy, p.48 Management of Direct Environmental Impacts, p.58	-
	3-3 Management of material topics	Sustainability Strategy/Policy, p.48 Management of Direct Environmental Impacts, p.58	-
GRI 302: Energy 2016	302-1 Energy consumption within the organization	Message from the Senior Management, p.6 Management of Direct Environmental Impacts, p.	-
	302-3 Energy Intensity	Management of Direct Environmental Impacts, p.58	-
	302-4 Reduction of energy consumption	Management of Direct Environmental Impacts, p.58	-
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG Emissions	Management of Direct Environmental Impacts, p.58	-
	305-2 Energy Indirect (Scope 2) GHG Emissions	Management of Direct Environmental Impacts, p.58	-
	305-5 Reduction of GHG emissions	Management of Direct Environmental Impacts, p.58	-
GRI 303: Water and Effluents 2018	303-5 Water consumption	Management of Direct Environmental Impacts, p.58	-
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	Management of Direct Environmental Impacts, p.58	-
	306-2 Management of significant waste-related impacts	Management of Direct Environmental Impacts, p.58	-
	306-3 Waste generated	Management of Direct Environmental Impacts, p.58	-
	306-4 Waste diverted from disposal	Management of Direct Environmental Impacts, p.58	-

GRI 400: SOCIAL STANDARDS SERIES 2016			
Employee Rights and Satisfaction			
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Corporate Governance Principles and Policies, p.30 Human Resources Approach, p.84	-
	3-2 List of material topics	Corporate Governance Principles and Policies, p.30 Human Resources Approach, p.84	-
	3-3 Management of material topics	Corporate Governance Principles and Policies, p.30 Human Resources Approach, p.84	-
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Human Resources Approach, p.84 Employee Profile, p.86	-
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Human Resources Approach, p.84	-
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Occupational Health and Safety (OHS) Approach, p.96	-
	403-2 Hazard identification, risk assessment, and incident investigation	Occupational Health and Safety (OHS) Approach, p.96	-
	403-3 Occupational health services	Occupational Health and Safety (OHS) Approach, p.96	-
	403-4 Worker participation, consultation, and communication on occupational health and safety	Occupational Health and Safety (OHS) Approach, p.96	-
	403-5 Worker training on occupational health and safety	Occupational Health and Safety (OHS) Approach, p.96	-
	403-6 Promotion of worker health	Occupational Health and Safety (OHS) Approach, p.96	-
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Occupational Health and Safety (OHS) Approach, p.96	-
	403-9 Work-related injuries	Occupational Health and Safety (OHS) Approach, p.96	-
	403-10 Work-related ill health	Occupational Health and Safety (OHS) Approach, p.96	-
			-

Diversity, Equal Opportunity and Non-Discrimination			
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Human Resources Approach, p.84	-
	3-2 List of material topics	Human Resources Approach, p.84	-
	3-3 Management of material topics	Human Resources Approach, p.84	-
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Human Resources Approach, p.84 Employee Profile, p.86 Inclusion, Opportunity and Gender Equality, p.92	-
	405-2 Ratio of base salary and remuneration of women to men	Confidentiality constraints Odeabank, does not share this information publicly in accordance with the institution's privacy policies.	-
GRI 406: Non-Discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	Inclusion, Opportunity and Gender Equality, p.92 No discrimination cases were encountered during the reporting period.	-
GRI 408: Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	Corporate Governance Principles and Policies, p.30	-
GRI 409: Forced and Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	Corporate Governance Principles and Policies, p.30	-
Training, Talent Management and Capacity Development			
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Human Resources Approach, p.84 Training and Capacity Building, p.90	-
	3-2 List of material topics	Human Resources Approach, p.84 Training and Capacity Building, p.90	-
	3-3 Management of material topics	Human Resources Approach, p.84 Training and Capacity Building, p.90	-
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	Training and Capacity Building, p.90	-
	404-2 Programs for upgrading employee skills and transition assistance programs	Training and Capacity Building, p.90	-

Stakeholder Relations and Stakeholder Management			
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Community Relations, p.62	-
	3-2 List of material topics	Community Relations, p.62	-
	3-3 Management of material topics	Community Relations, p.62	-
GRI 413: Local Communities 2016	413-2 Operations with significant actual and potential negative impacts on local communities	Management of Environmental and Social Risks due to Lending Activities / ESMS, p.56	-
Corporate Social Responsibility			
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Corporate Social Responsibility Approach, p.70	-
	3-2 List of material topics	Corporate Social Responsibility Approach, p.70	-
	3-3 Management of material topics	Corporate Social Responsibility Approach, p.70	-
Customer Satisfaction (Business and Service Development/Quality)			
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Customer Satisfaction Approach, p.103	-
	3-2 List of material topics	Customer Satisfaction Approach, p.103	-
	3-3 Management of material topics	Customer Satisfaction Approach, p.103	-
GRI 416: Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of product and service categories	Innovative Services and Products, p.110	-
Digital Transformation			
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Digitalization and Innovation Efforts, p.106	-
	3-2 List of material topics	Digitalization and Innovation Efforts, p.106	-
	3-3 Management of material topics	Digitalization and Innovation Efforts, p.106	-

Women Empowerment Principles (WEPs) Improvement Declaration

REPORTING CONSULTANCY



escarus

(TSKB Sustainability Consultancy)

info@escarus.com

www.escarus.com

T: +90 (212) 334 5460

DESIGN

Pelin Günlaltay

www.orfereklam.com.tr

PRINCIPLES	GRI STANDARD STATEMENTS	PAGE REFERANCES
Principle 1 – Ensuring Top Level Institutional Leadership for Gender Equality	GRI 405-1, GRI 405-2	Human Resources Approach, p.84 Community Relations, p.62
Principle 2 – Treating All Women and Men Fairly in Business, Respecting Human Rights and Non-Discrimination, Supporting These Principles	GRI 202-1; GRI 401-1; GRI 401-3; GRI 405-1; GRI 405-2; GRI 406-1	Human Resources Approach, p.84
Principle 3 – Ensuring the Health, Safety and Wellbeing of All Female and Male Employees	GRI 403-2; GRI 406-1	Human Resources Approach, p.84
Principle 4 – Supporting Women's Education, Training and Professional Development Opportunities	GRI 404-1; GRI 404-3	Human Resources Approach, p.84 Community Relations, p.62
Principle 5 – Application of Entrepreneurial Development, Supply Chain and Marketing Methods for Women's Empowerment	GRI 3-3; GRI 204-1;	Human Resources Approach, p.84 Community Relations, p.62
Principle 6 – Promoting Equality through Community Initiatives and Advocacy	GRI 413-1	Human Resources Approach, p.84 Community Relations, p.62
Principle 7 – Evaluation and Public Reporting of Achievements on Gender Equality	GRI 3-3; GRI 405-1; GRI 405-2	Human Resources Approach, p.84



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odeabank

Headquarter

Esentepe Mahallesi Büyükdere Cad. Levent 199 Apt.
No:199/119 Şişli/İstanbul

T: +90 212 304 84 44