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## 1. Introduction

Odeabank's Sustainability Policy reflects our commitment to integrating environmental, social, and governance (ESG) principles into every aspect of our operations. Sustainability is a fundamental component of the Bank's long-term strategic priorities. Recognizing the critical role of the financial sector in addressing climate change and fostering inclusive growth, we align our strategy with the United Nations Sustainable Development Goals (SDGs), Türkiye's 2053 Net Zero target, and international best practices.

Our policy sets out clear principles—integrity, transparency, responsible growth, and inclusiveness—guiding our approach to risk management, stakeholder engagement, and product innovation. We are dedicated to minimizing our environmental footprint, supporting our clients' transition to sustainable business models, and investing in our communities.

Governance and accountability are central to our approach. The Sustainability Unit, reporting to senior management, coordinates policy implementation, while the Corporate Governance and Sustainability Committee provides oversight and ensures alignment with regulatory requirements. We commit to transparent reporting, regular policy reviews, and continuous improvement, ensuring our actions deliver long-term value for all stakeholders.

## 2. Purpose, Objectives and Areas of Focus

The purpose of this Policy is to define Odeabank's overarching approach to sustainability and to establish the guiding principles, management framework, and strategic objectives that underpin our commitment to sustainable development. Odeabank recognizes its responsibility to contribute to a more sustainable future by integrating ESG considerations into all aspects of its operations and decision-making.

### Strategic objectives

Through this Policy, Odeabank aims to achieve the below strategic objectives:

- **Promoting Sustainable Business Opportunities:** Develop and expand sustainable products and services to provide customers with innovative solutions, capitalize on emerging opportunities, and integrate environmental and social risk considerations into management processes.
- **Reducing Environmental Impact:** Effectively manage the environmental impacts of both direct and indirect activities, implement practices to reduce the Bank's carbon footprint, and collaborate with stakeholders to advance environmental stewardship.
- **Fostering Responsible Stakeholder Relations:** Establish and maintain responsible relationships with customers and suppliers, promote diversity and inclusiveness among employees, enhance transparency, and invest in society. Regularly report on sustainability performance and strengthen accountability across all operations.

### Primary Focus Areas

The Bank's sustainability efforts are directed by several key focus areas that reflect its strategic priorities and commitment to responsible banking:

- **Combating Climate Change and Protecting Natural Resources:** Develop solutions that support the transition to a low-carbon economy in alignment with Türkiye's 2053 Net Zero target, and contribute to the preservation of natural capital.
- **Inclusive Growth:** Support the advancement of social welfare and economic development in an inclusive manner, ensuring that no one is left behind during the transformation process, and making the opportunities of the new era accessible to all.
- **Adherence to the United Nations Global Compact:** Uphold the ten universally recognized principles of the United Nations Global Compact (UN Global Compact) as a foundation for responsible business conduct and sustainable development.

This Policy serves as a foundation for Odeabank's ongoing efforts to embed sustainability into its business strategy, culture, and stakeholder relationships, ensuring that present and future generations can thrive

### 3. Scope

This Policy applies to all activities, operations, and decision-making processes across Odeabank. It establishes the foundational principles that guide the Bank's approach to sustainability and is designed to be implemented in conjunction with other internal policies, procedures, and practices. These include, those aligned with the SDGs and recognized international standards.

The Policy is applicable to all departments, business units, committees, and employees of the Bank. It is intended to ensure that sustainability considerations are integrated into daily operations and strategic planning at every level of the organization. It is acknowledged that, even if the names of such structures change over time, the continuation of the respective responsibilities shall prevail as the governing principle.

This Policy is complemented by a range of supporting policies and procedures, which together form a comprehensive framework for responsible and sustainable banking, including:

- PL-01 Employee Handbook
- PL-04 Corporate Governance Policy
- PL-014 AML – CFT Policy
- PL-015 Conflict of Interest Policy
- PL-021 Remuneration Policy
- PL-036 Environmental and Social Policy
- PL-044 Corporate Social Responsibility Policy
- PL-048 Anti-Bribery and Anti-Corruption Policy
- P-047-FIN Goods and Services Procurement Procedure
- P-223-MHZ Customer Notifications Management Procedure

References within this Policy to specific areas, departments, or committees are intended to refer to the relevant responsible parties, regardless of any changes in organizational structure or nomenclature. The Bank's commitment to sustainability remains consistent, ensuring that all obligations are met and that the highest standards of ethical and responsible conduct are maintained.

## 4. Sustainability Principles

Odeabank is committed to supporting sustainable development across all of its activities and adheres to the following fundamental principles:

- **Integrity:** Acting with honesty, ethical standards, and a sense of responsible banking in all business processes.
- **Risk Management:** Proactively identifying, assessing and managing long-term risks, including ESG risks.
- **Transparency:** Ensuring open, accurate, timely, and reliable communication with stakeholders and regularly reporting on sustainability performance.
- **Responsible Growth:** Pursuing a business model that balances profitability with the creation of economic and social value.
- **Value Creation:** Developing sustainable solutions that generate benefits for all stakeholders, including customers, employees, investors, society, and the environment.
- **Regulatory Compliance:** Adhering to all applicable national and international laws, regulations, sectoral standards, and voluntary commitments.
- **Inclusiveness:** Encouraging the active participation of employees and stakeholders in sustainability processes.
- **Human Rights and Diversity:** Respecting human rights in all operations, and promoting inclusiveness, equal opportunity, and diversity.
- **Responsible Procurement:** To consider environmental, social, and ethical criteria in procurement processes and ensure the preference of sustainable products and services.

In this context, the following principles are established in this Policy with respect to sustainability.

### A. Environmental Principles

#### Commitment to Environmental Stewardship

- Integrate climate-related risks and opportunities into business strategy, processes, and risk management frameworks.
- Implement Environmental and Social Risk Management process
- Assess and manage both direct and indirect environmental impacts of all activities, including those of subsidiaries.
- Align lending and investment activities with international agreements, guidelines, and best practices, particularly those promoted by the United Nations.
- Set and pursue targets to minimize greenhouse gas emissions from operational and banking activities, and support the transition to a low-carbon economy.
- Promote the use of renewable energy and energy efficiency within operations.

### B. Social Principles

#### Dedication to Social Responsibility and Inclusion

- Foster the active participation of employees and stakeholders in sustainability initiatives.
- Respect human rights in all operations and promote equal opportunity, diversity, and inclusion.
- Create a safe, respectful, and equitable working environment that supports occupational health, social justice, and labor rights.
- Integrate sustainability into daily operations
- Ensure equal opportunity and prevent all forms of discrimination, with a focus on supporting the employment of women, youth, and disadvantaged groups.

- Support customers in adopting sustainable business models and provide financial solutions that facilitate this transition.
- Enhance financial inclusion through digital solutions and technological innovation.
- Engage with stakeholders to advance the contribution of financial markets to SDGs.
- Implement corporate social responsibility projects and invest in capacity-building and awareness-raising initiatives.
- Develop social investment programs
- Collaborate with employees, shareholders, suppliers, and society to facilitate positive social change and share knowledge and resources.

## C. Governance Principles

### Upholding Strong Governance and Ethical Standards

- Conduct all business activities with honesty, ethical standards, and a strong sense of responsibility.
- Proactively identify, assess, and manage long-term risks, including those related to ESG factors.
- Ensure open, accurate, and timely communication with stakeholders, and regularly disclose sustainability performance.
- Pursue a business model that balances profitability with the creation of economic and social value.
- Develop and promote solutions that deliver benefits to customers, employees, investors, society, and the environment.
- Adhere to all applicable national and international laws, regulations, sectoral standards, and voluntary commitments.
- Uphold the highest standards of anti-bribery and anti-corruption.
- Incorporate environmental and social risk assessments into credit processes and strive to enhance positive impacts while mitigating negative ones.
- Communicate sustainability activities transparently and in accordance with accountability principles.

## 5. Implementation and Supervision of the Policy

### 5.1. The Sustainability Unit

The Sustainability Unit is responsible for coordinating and supporting the implementation of this Policy across the Bank. This Unit reports directly to the Senior Manager of Financial Institutions, Funding, and Sustainability, who oversees the execution of the Policy.

Key responsibilities:

- Reviewing existing policies and procedures to ensure alignment with the Bank's sustainability strategy and compliance with the Türkiye Sustainability Reporting Standards (TSRS).
- To voluntarily report the Bank's sustainability performance in compliance with standards and to carry out the necessary data collection, analysis, and reporting processes within this scope.
- Coordinating with relevant departments to develop and monitor short-, medium-, and long-term sustainability goals and actions.
- Ensuring that all departments comply with the principles and requirements of this Policy.

- Overseeing the Bank's fulfillment of mandatory sustainability reporting obligations in accordance with TSRS, including the preparation and coordination of external assurance processes.
- Reporting progress and challenges to the Corporate Governance and Sustainability Committee.
- Submitting all required approval to the Policy becomes effective once approved by the Corporate Governance and Sustainability Committee and the Board of Directors, with the owning department responsible for managing the approval process.

## 5.2. Governance Structure

The Corporate Governance and Sustainability Committee, comprising members of senior management and relevant department heads, assists the Board of Directors in overseeing the Bank's sustainability activities. The Committee is responsible for:

- Reviewing the effectiveness of sustainability initiatives,
- Monitoring progress against strategic objectives,
- Making recommendations for continuous improvement,
- Supporting the preparation of the annual Sustainability Report in line with TSRS requirements.

The Committee meets regularly and reports directly to the Board of Directors, ensuring that sustainability remains a strategic priority at the highest level of governance. The Committee may invite any director, officer of the Bank or such other person to its meetings if it deems appropriate.

The relevant Bank executives guarantee that the necessary actions will be taken to ensure compliance with the Policies, Procedures or other practices adopted in connection with sustainability with respect to their areas of responsibility.

The Board of Directors audits the implementation of the Policy by means of regular or one-off reports that it receives, which will be submitted by Sustainability Unit, the managers dealing with sustainability at the Bank or, where necessary, by executives managing the control and audit functions of the Bank.

## 5.3. Review and Approvals

This Policy is reviewed at least once a year or as needed to maintain its relevance, effectiveness, and compliance with the TSRS.

The Policy becomes effective once approved by the Corporate Governance and Sustainability Committee and the Board of Directors, with the owning department responsible for managing the approval process.

## 5.4. Key Stakeholders

- **Customers:** Places its customers at the center of its activities, develops solutions for a sustainable future, and offers financing models that take into account the environmental and social impacts of investments.
- **Employees:** Remains committed to human rights, diversity, and equal opportunities, and supports professional development, work–life balance practices, and a culture of volunteering.

- **Shareholders and Investors:** Ensures transparent and regular information sharing and maintains open dialogue with investors.
- **Suppliers:** Adheres to responsible procurement principles and promotes products and services that respect human rights and are socially and environmentally responsible.
- **Public Institutions and Legislators:** Demonstrates full compliance with legislation and engages in constructive dialogue to contribute to the development of public policies in the field of sustainability.
- **Local Communities:** Develops social investment programs in areas such as education, financial literacy, entrepreneurship, gender equality, support for vulnerable groups, culture and arts, and emergency assistance.
- **International Financial Institutions:** Maintains international cooperation and funding relationships and contributes to the development of sustainable finance mechanisms at the global level.
- **Non-Governmental Organizations (NGOs) and Associations:** Collaborates on common social and environmental objectives and strengthens its social responsibility approach by supporting projects that generate societal benefit.
- **Universities:** Provides academic contributions to sustainability through knowledge sharing, research collaborations, and engagement with young talent, and develops joint projects that foster innovation.
- **Media:** Ensures reliable communication with society by adhering to the principles of transparency and accurate public information regarding sustainability initiatives and social investments.

## 5.5. Transparency and Reporting

Odeabank is committed to maintaining the highest standards of transparency and accountability in all aspects of its sustainability journey. The Bank ensures that stakeholders are regularly informed about its sustainability performance, progress, and challenges through clear and accessible communication channels.

Key commitments include:

- **Annual TSRS-Aligned Sustainability Reporting:** Odeabank publishes an annual TSRS Compliant Sustainability Report, prepared in accordance with TSRS 1 and TSRS 2, having completed the mandatory assurance processes under the TSRS framework and taking into account applicable exemptions.
- **Annual Sustainability Reporting:** Odeabank voluntarily reports its sustainability performance in compliance with the Reporting Standards and effectively carries out the processes of data collection, analysis, verification, and reporting within this scope.
- **External Assurance:** Where appropriate, sustainability data and reports will be subject to independent external assurance to enhance credibility and reliability.
- **Stakeholder Engagement:** Odeabank will maintain open channels of communication with stakeholders, actively seeking and incorporating feedback to inform ongoing policy and strategy development.

- **Continuous Improvement:** The Odeabank will regularly review and update its reporting practices to reflect evolving regulatory requirements, stakeholder expectations, and best practices in sustainability disclosure.

Through these measures, Odeabank reinforces its dedication to openness, accountability, and continuous improvement in all sustainability-related activities.