odeabank

2025

SUSTAINABILITY REPORT

Empowering and Transformative Banking

CONTENTS

Introduction

Empowering and Transformative Banking

Responsible Transformation Finance

Performance and Areas for Progress

About Odeabank

Financial Empowerment

Human-Centered Banking

Appendix

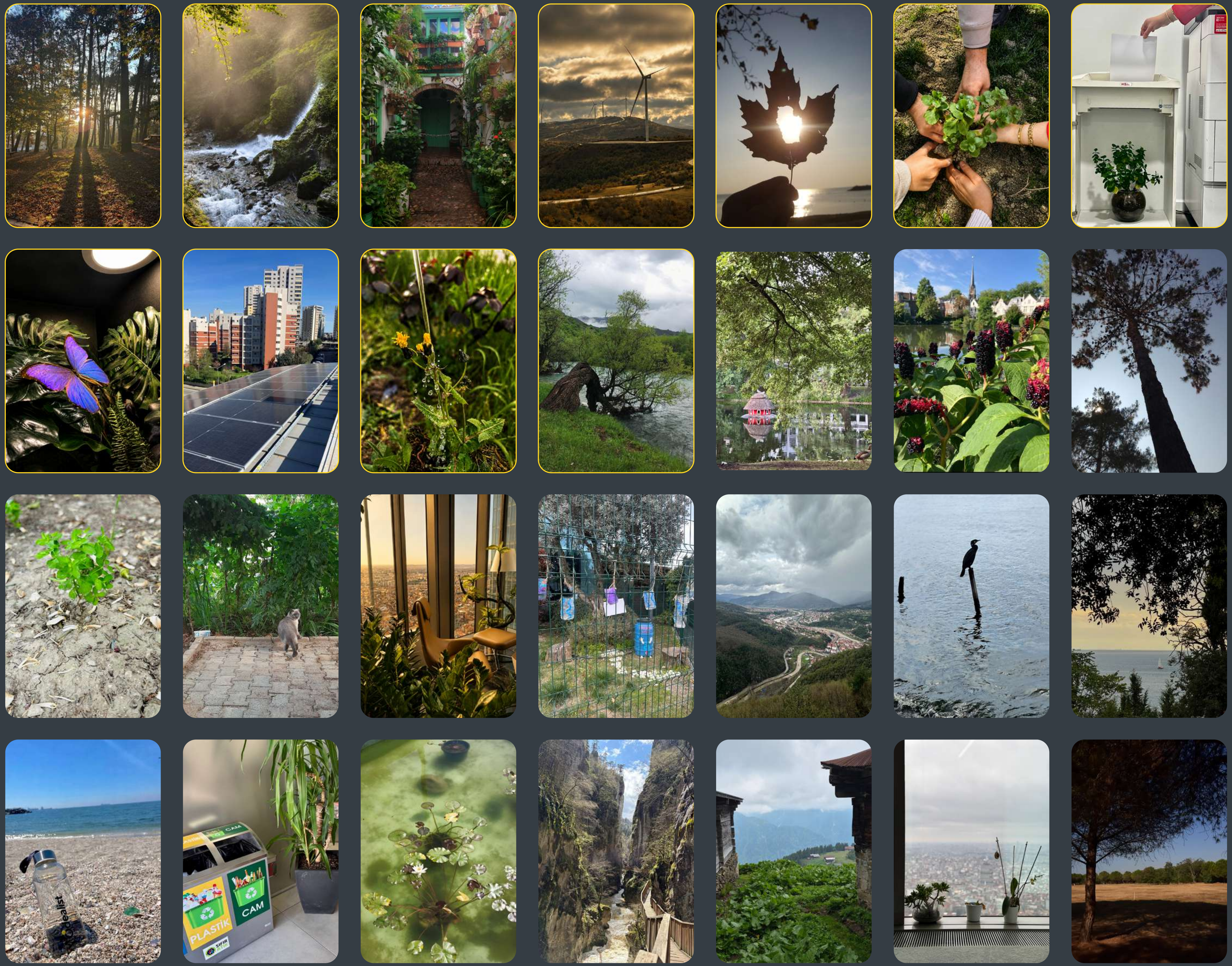
2025
Sustainability Photo Contest

At Odeabank, we place importance on embedding the integrated thinking approach into our corporate culture and encouraging the active participation of our employees in the reporting process. In line with this understanding, we organized the second edition of our photo competition, first launched last year, under the theme "Sustainability at Work".

Through this competition, we invited our employees to interpret the concept of sustainability from their own perspectives and to share their observations on the environment, people, society, and the future through visual storytelling. In this way, we aimed to transform our report into a participatory communication tool that not only presents our performance and targets, but also reflects the contributions and shared perspectives of our employees.

This year, we featured the winning photographs in different sections of our report, making our employees' awareness, creativity, and contributions to sustainability more visible. We would like to thank all colleagues who participated for sharing their perspectives on a sustainable future and for adding value to the visual identity of our report.

All submitted and award-winning photographs featured in the report can be accessed in the "Appendix".



Introduction

ABOUT THE REPORT

PURPOSE AND APPROACH OF THE REPORT

As Odeabank A.Ş. ("Odeabank" or the "Bank"), we view sustainability as an integral part of our long-term value creation approach and business model. Through this report, we aim to share with our stakeholders a transparent and holistic overview of our environmental, social and governance (ESG) performance, sustainability priorities, strategic focus areas, transformation initiatives, and the practices implemented during the year.

Our report is structured around three core value pillars: *Financial Empowerment*, *Human-Centered Banking*, and *Responsible Transformation Finance.* In developing the content structure, we adopted an integrated thinking approach that reflects the links between our strategy, materiality topics, risks and opportunities, and value creation approach. In this context, we address our work in areas such as customer experience, digitalization, financial inclusion, sustainable finance, employee experience, climate-focused transformation, and corporate governance as an interconnected whole.

We shape our sustainability strategy in line with the materiality topics identified through a double materiality assessment, and we evaluate the economic, environmental, and social impacts we create for our stakeholders from a holistic perspective.

The 2025 reporting process was coordinated by the Sustainability Department with contributions from relevant business units. During this process, we aimed to strengthen our internal capabilities in sustainability reporting and further develop our reporting approach into a more integrated structure across the organization.

SCOPE AND REPORTING PERIOD

Unless otherwise stated, this report covers the sustainability performance of Odeabank and its subsidiary, Odeatech and ESG-related operations conducted in Türkiye between 1 January 2025 and 31 December 2025.

Material events after 31 December 2025, including the February 2026 capital increase, are disclosed as subsequent events for completeness. The publication date of this report is July 2026.

The report was prepared under the coordination of the Sustainability Department with contributions from the Sustainability Working Group. During the reporting process, data on the Bank's sustainability performance was collected from relevant business units, and the content was structured in a holistic manner in line with materiality topics and strategic focus areas.

You can access our sustainability approach and reports from *here.*

You may also share your feedback, suggestions, or questions regarding our sustainability activities with us at *sustainability@odeabank.com.tr*

More detailed information regarding the Bank's financial performance, operations, corporate governance structure, and strategic developments can be found in the *2025 Annual Report.*

Sustainability disclosures prepared in complaint with the **Türkiye Sustainability Reporting Standards (TSRS)** have been published as a separate document. Throughout this report, readers are directed to the relevant TSRS compliant disclosures where applicable.

You can access our TSRS compliant sustainability disclosures, which transparently present our climate related risks and opportunities in accordance with the TSRS framework *here.*

REPORTING FRAMEWORKS AND REFERENCES

In preparing the report content, national and international reporting standards, guidelines, and best practice frameworks were taken into consideration.

FRAMEWORK / STANDARD	AREA OF USE	CONTRIBUTION TO THE REPORT
Integrated Reporting Framework (<IR> Framework)	Integrated thinking approach	Structuring the links between our value creation approach and strategy, risks, and materiality topics
GRI Standards 2021 (Global Reporting Initiative – GRI)	Sustainability disclosures	Used as a reference framework for structuring sustainability disclosures and reporting ESG performance
United Nations Sustainable Development Goals (SDGs)	Impact management approach	Linking our operations to global sustainable development objectives
United Nations Global Compact (UN Global Compact - UNGC)	Principles and commitment approach	Supporting our practices in human rights, labour standards, environment, and anti-corruption
Carbon Disclosure Project (CDP) Climate Change Program	Climate-related disclosures	Enhancing our approach to climate risks, opportunities, and carbon management
World Economic Forum (WEF) Stakeholder Capitalism Metrics	Stakeholder-focused performance approach	Supporting long-term value creation and stakeholder-oriented performance measurement
S&P Corporate Sustainability Assessment (CSA) criteria and London Stock Exchange Group (LSEG) ESG metrics	ESG assessment approach	Structuring our sustainability performance data and supporting international assessment processes

NAVIGATION OF THE REPORT

THIS ICON INDICATES PHOTOGRAPHS SUBMITTED BY PARTICIPANTS OF OUR PHOTO COMPETITION.

THIS ICON SHOWS THAT STAKEHOLDER OPINIONS ARE INCLUDED WITHIN THE REPORT.

THIS ICON INDICATES GOOD PRACTICE EXAMPLES FOR THE BANK'S APPROACHES AND INITIATIVES

THE NAVIGATION AREA AT THE TOP OF THE REPORT ENABLES READERS TO QUICKLY ACCESS THE "TABLE OF CONTENTS" PAGE.

< > THIS FUNCTION ALLOWS USERS TO MOVE FORWARD AND BACKWARD BETWEEN PAGES WITHIN THE REPORT.

SCAN THE QR CODES TO WATCH LEADERSHIP MESSAGES THAT HELP SHAPE THIS REPORT.

EMİR KADİR ALPAY
AGM* IN CHARGE OF TREASURY, CAPITAL MARKETS AND FINANCIAL INSTITUTIONS

STANDARD VERSION

ACCESSIBLE VERSION

Sign Language Interpretation and Audio Description

BURCU AKIN ÖZTEMEL
FINANCIAL INSTITUTIONS, FUNDING AND SUSTAINABILITY SENIOR MANAGER

STANDARD VERSION

ACCESSIBLE VERSION

Sign Language Interpretation and Audio Description

Assistant General Manager

BANKING IN A CHANGING WORLD

At Odea Bank, we embrace this transformation through a holistic approach centered on financial empowerment, responsible transformation finance, and human-centered banking.

The year 2025 was marked by geopolitical tensions, uncertainties in trade policies, macroeconomic rebalancing, the climate crisis, the growing need for sustainable finance, digitalization, and an AI-driven transformation that reshaped the business landscape and the financial sector.

From a banking perspective, this transformation has made more visible not only the role of providing financing, but also how capital is allocated, how risks are managed, how clients' transformation needs are supported, how digital trust is ensured, and how long-term value creation is strengthened.

For the Turkish economy, 2025 was a period closely monitored in terms of macroeconomic rebalancing, the disinflation process, tight monetary policy, high funding costs, credit conditions, current account balance, and reserve outlook. In this environment, the financing needs of the real sector diversified beyond working capital and investment financing to include energy efficiency, digital transformation, green production, sustainable supply chains, export competitiveness, and regulatory compliance.

The European Union Green Deal, the Carbon Border Adjustment Mechanism (CBAM), TSRS Compliant reporting requirements, and the evolving regulatory framework for sustainable finance have made it increasingly important for companies to systematically manage their environmental and social impacts. This transformation has accelerated the shift in banks' roles from being mere providers of finance to becoming guides in clients' transition journeys, enabling risk transparency, and supporting sustainable value creation.

Through our digitalized customer experience, data security and cyber resilience approach, sustainable finance products, environmental and social risk management practices, human capital focus, and inclusive banking approach, we believe that banking in a changing world must respond not only to today's needs but also to the transformation requirements of the future.

2025 GLOBAL TRENDS, IMPACT ON THE BANKİNG SECTOR, AND ODEABANK'S RESPONSE

Trend	Global Context and Implications for the Banking Sector	Risk / Opportunity Perspective	Odeabank's Response	Our Focus in 2025	Report Link
1. Macroeconomic Uncertainty, Capital Discipline and Selective Growth	The banking sector had to simultaneously manage interest rates, funding costs, asset quality, divergence in customer demand, and capital efficiency. Globally, banks increasingly shifted from scale-driven growth to more targeted approaches based on the right customer, right product, right pricing, and right risk appetite.	**Risk:** Funding costs, need for selective credit growth, pressure on asset quality, customer segmentation divergence. **Opportunity:** Data-driven customer management, risk-based pricing, balance sheet discipline, more targeted growth, faster response to customer needs.	We adopt a balanced growth approach that integrates financial resilience, capital structure, risk management capacity, and customer needs. We place customer experience, digitalization, and data-driven decision-making at the core of our financial empowerment approach.	Strengthening selective and balanced growth through risk management and customer-focused financial solutions.	*Strengthening Financial Resilience; Risks, Opportunities and Resilience*
2. Climate Risks, Reporting and Financial Impact Management	Climate change has evolved from an environmental issue into a strategic risk affecting credit risk, portfolio resilience, operational continuity, and long-term value creation. Emerging standards aligned with TSRS and ISSB emphasize transparent and comparable disclosure of climate-related risks and opportunities across governance, strategy, risk management, metrics, and targets.	**Risk:** Physical and transition risks, compliance requirements, data quality, need for improved financial impact measurement. **Opportunity:** Sustainable finance, energy efficiency, low-carbon transition finance, integration of climate data into decision-making	We integrate climate-related risks and opportunities into our governance, strategy, and risk management processes. We systematically disclose climate-related information through our TSRS Compliant Sustainability Report and connect it with our strategy, responsible finance approach, and value creation model in our sustainability reporting.	Enhancing visibility of the financial impacts of climate risks and opportunities, improving data-driven reporting quality, and strengthening integration with sustainable finance and E&S risk management.	*TSRS Compliant Sustainability Report; Financing the Transition to a Low-Carbon Economy; Risks, Opportunities and Resilience; Climate-focused Transition Approach*
3. Deepening Sustainable Finance and Transition Finance	The transition to a low-carbon economy is expanding beyond green investments to include transition finance supporting the transformation of carbon-intensive sectors. Regulatory expectations, investor demands, supply chain transformation, and export market requirements are increasing pressure on financial institutions to allocate capital toward long-term transformation.	**Risk:** Regulatory expectations, transition planning requirements, compliance costs in carbon-intensive sectors, portfolio transition management. **Opportunity:** Green and sustainable finance products, energy efficiency investments, transition finance, sustainable supply chain financing, portfolio alignment tracking.	We treat sustainable finance as a strategic value creation area supporting clients' transition to a low-carbon economy. We provide green, social, and sustainability-themed products while integrating environmental and social risks into our credit processes.	Systematic monitoring of sustainable finance through the Green Asset Ratio (GAR), portfolio alignment assessment, and strengthening financing solutions supporting clients' transition needs.	*Financing the Transition to a Low-Carbon Economy; Responsible Products and Services*
4. Artificial Intelligence, Responsible Technology and Digital Trust	Artificial intelligence, data analytics, and digital platforms are transforming customer experience, operational efficiency, and decision-making in banking. However, this transformation also increases the importance of data security, algorithmic transparency, ethical AI use, cyber resilience, third-party risks, and business continuity.	**Risk:** Cybersecurity threats, data privacy breaches, ethical AI risks, operational disruptions, technology dependency. **Opportunity:** Personalized customer experience, operational efficiency, process automation, data-driven decision-making, phygital banking experience, innovation capacity.	We consider technology a strategic lever strengthening our phygital banking approach and customer experience. Through Odeatech's R&D and technology capabilities, we develop solutions in AI, data management, digital banking infrastructure, and automation. We prioritize information security, data privacy, cyber resilience, and ethical technology use.	Scaling Odeatech's capabilities; strengthening AI, data, and automation solutions; improving digital customer experience, cyber resilience, and operational efficiency.	*Digitalized and Enhanced Customer Experience; Data Security and Cyber Resilience*

Trend	Global Context and Implications for the Banking Sector	Risk / Opportunity Perspective	Odeabank's Response	Our Focus in 2025	Report Link
5. Geopolitical Fragility, Supply Chains and Resource Security	Geopolitical tensions, trade policy shifts, supply chain regionalization, and access to critical resources are shaping the global economy. These dynamics increase the importance of supply chain resilience, operational continuity, and regulatory compliance.	**Risk:** Country risk, trade finance exposure, customer cash flow volatility, supply chain disruption, compliance risks, input cost inflation. **Opportunity:** Resilient supply chains, sustainable sourcing practices, transition investments, financial solutions supporting adaptation to market changes.	We closely monitor geopolitical and regulatory developments and support clients in adapting to changing market conditions through tailored financial solutions. We promote responsible business conduct through our supplier code of conduct and value chain approach.	Strengthening alignment between client needs, financing solutions, and value chain practices under evolving regulatory and market conditions.	*Value Chain Management; Responsible Products and Services; Our Ethics and Compliance Approach*
6. Nature, Resource Efficiency and Environmental Impact Management	Climate change-related nature loss, water stress, energy efficiency, waste management, and resource use are increasingly affecting operational resilience and financial performance. For banks, this requires both managing their own environmental footprint and assessing client-related environmental risks within credit processes.	**Risk:** Water stress, resource scarcity, waste management obligations, biodiversity loss, rising operational costs, portfolio exposure to client environmental risks. **Opportunity:** Resource efficiency, energy efficiency, circular economy, waste reduction, low-carbon production investments, sustainable finance products.	We monitor our operational environmental impacts across energy, emissions, water, and waste, while continuing energy efficiency and emissions reduction efforts. We also integrate environmental and social risk assessments into our financing processes.	Improving monitoring of operational energy and waste management, continuing emissions reduction efforts, and strengthening E&S risk assessments in financing.	*Operational Environmental Impact; Energy Management and Efficiency*
7. Just Transition, Inclusive Culture and Talent Transformation	Technological transformation, demographic change, and evolving employee expectations are reshaping talent management, employee experience, and corporate culture. AI and digitalization are changing ways of working, making upskilling, inclusion, and continuous learning more critical.	**Risk:** Digital skills gaps, talent loss, declining employee engagement, slow adaptation to transformation, weak inclusivity. **Opportunity:** Flexible and inclusive culture, attraction of young talent, upskilling in AI and data analytics, improved productivity and employee experience.	Through our Human-Centered Banking approach, we focus on employee development, diversity, equity and inclusion, and financial empowerment. We support young talent development and transformation-focused skill building to prepare our workforce for the future of banking	Developing digital and transformation skills, supporting young talent, strengthening inclusive culture, and creating social impact through financial literacy initiatives.	*Employee Experience, Health and Well-being; Empowering Talent; Diversity, Equity and Inclusion*

OUR STRATEGIC RESPONSE: EMPOWERING AND TRANSFORMATIVE BANKING

In a rapidly changing world, banking extends beyond its traditional financial intermediation role. It also entails anticipating risks, supporting clients through their transformation journeys, using technology responsibly and securely, scaling sustainable finance, and creating broader societal value.

At Odeabank, we respond to this transformation through our **"Empowering and Transformative Banking"** approach. This approach is built around three strategic themes: Financial Empowerment, Responsible Transformation Finance, and Human-Centered Banking.

Financial Empowerment

Connection to a Changing World
Digitalization, evolving customer expectations, financial inclusion, digital trust, and the growing need for data-driven services

Odeabank's Strategic Response
Digitalized customer experience, data security, financial well-being, and accessible and inclusive banking solutions

Related Trends
1, 4, 7

Responsible Transformation Finance

Connection to a Changing World
Climate change, the transition to a low-carbon economy, sustainable finance, resource efficiency, and environmental and social risk management

Odeabank's Strategic Response
Financing the transition to a low-carbon economy, responsible products and services, the Environmental and Social Risk Management (ESRM) System, and operational environmental impact management

Related Trends
2, 3, 5, 6

Human-Centered Banking

Connection to a Changing World
Talent transformation, inclusive growth, employee experience, social impact and financial literacy

Odeabank's Strategic Response
Employee development, diversity, equity and inclusion, employee health and well-being, and social impact and community investments

Related Trends
4, 7

No	Source
1	EY, Global Banking Outlook 2025
2	McKinsey & Company, Global Banking Annual Review 2025
3	Deloitte, 2025 Banking and Capital Markets Outlook
4	IFRS Foundation, IFRS S2 Climate-related Disclosures
5	BDDK, Sürdürülebilir Bankacılık Stratejik Planı / Sürdürülebilir Bankacılık Kaynakları
6	PwC, Megatrends

No	Source
7	Accenture, Technology Vision 2025
8	Accenture, Technology Vision 2025 PDF
9	Accenture, Technology Vision 2025 basın duyurusu
10	PwC, Global Megatrends sayfası
11	World Economic Forum, Future of Jobs Report 2025
12	World Economic Forum, Future of Jobs Report 2025 PDF

MESSAGE FROM THE CHAIR

Dear Stakeholders,

Türkiye continues to offer strong opportunities from a long-term investment perspective through its production capacity, young and dynamic population, entrepreneurial strength, regional position and resilient financial system. At a time when global economic dynamics are being reshaped, trade corridors are shifting, and technology and climate agendas are transforming business priorities, we believe that Türkiye's role in this transformation has become even more strategic.

The banking sector plays a critical role in transforming this potential into sustainable value. A strong and responsible banking system not only supports access to finance but also contributes to channeling capital into productive areas, strengthening the transformation capacity of companies, accelerating digitalization and financing the transition to a low-carbon economy.

We assess the new era for Odeabank from this perspective. With ADQ's investment in Odeabank the Bank has gained the opportunity to advance its strategic transformation journey with a stronger capital structure, a broader international perspective and long-term growth objectives. This investment is a concrete indicator of confidence in Türkiye's banking sector and in the country's sustainable economic future.

In 2025, Odeabank presented a more integrated sustainability approach across Financial Empowerment, Responsible Transition Finance and Human-Centered Banking. We consider it important that the Bank's strategic focus is deepening in areas such as customer experience, digitalization, data security, climate-driven transformation, environmental and social risk management and human capital. All these areas support not only today's performance but also the Bank's future competitiveness and long-term value creation capacity.

We regard sustainable development for Odeabank not merely as a compliance matter but as a critical roadmap. Accordingly, the Bank is committed to integrating environmental and social considerations into its financing decisions, addressing climate-related risks and opportunities in a more systematic manner, strengthening its TSRS compliant sustainability reporting approach, and maintaining transparent communication with stakeholders.

Looking ahead, we believe that Odeabank will play an increasingly important role in its customers' transformation journeys through its strong capital structure, agile organization, digital capabilities and sustainability focus. While growing the Bank's contribution to the Turkish economy, we will continue

At Odea Bank, we continue to take determined steps toward a better world.

to support the strengthening of financial resilience, inclusiveness and responsible growth together.
I would like to thank all Odeabank employees who contributed to this journey, as well as our customers, business partners and all stakeholders who have placed their trust in the Bank.

Sincerely,

Marcos Alonso De Quadros
Chair of the Board of Directors

MESSAGE FROM THE CEO

Dear Stakeholders,

2025 was an important year for Odeabank, during which we strengthened our strategic transformation with concrete results and placed our sustainability program on a more measurable footing while maintaining our financial resilience. Amid macroeconomic rebalancing, evolving financing conditions, accelerated digitalization, changing customer expectations and the growing need for sustainability-led transformation across the banking sector, we focused on disciplined balance sheet management, human-centered growth, stronger technological capabilities and long-term value creation.

Following ADQ's acquisition of 96% of Odeabank's share capital, we strengthened our capital base and gained a broader international perspective to support our long-term growth objectives. In 2025, our paid-in capital increased by 60% to TRY 5.26 billion. Our capital structure, strengthened through the capital increase, supported the Bank's financial resilience while placing our technology investments, sustainable financing capacity and human-centered growth approach on a more solid foundation. We consider this development not merely a change in our shareholding structure, but a critical step supporting Odeabank's future growth capacity and long-term value creation strength.

We closed 2025 with strong financial indicators. **Our total assets increased by 55%, reaching TRY 123 billion.** Our net loans amounted to TRY 50 billion, while our deposits reached TRY 70.6 billion. Our capital adequacy ratio maintained its strong position at 16.3%. This performance was a direct result of our disciplined balance sheet management, prudent approach to risk and selective growth strategy.

The solutions we offer for our customers' investment and savings needs also gained strong momentum in 2025. Our non-deposit assets under management reached TRY 101.6 billion. **We increased our TRY-denominated fund volume by 60.5% to TRY 94.2 billion.** These results demonstrate that our capacity to offer products and services aligned with our customers' changing expectations has strengthened, while also reflecting the concrete outcomes of our investment-oriented banking approach.

We continued to enhance the experience we provide through our digital channels. **While our number of digital customers approached 250,000, our mobile transaction volumes increased by 19%.** We also continued to improve our digital channels to offer customers a faster, more accessible and integrated banking experience. We consider our progress in this area not only in terms of transaction volumes or channel usage, but also as a transformation that makes the customer experience simpler, safer and more personalized.

The completion of our shareholding structure transformation in 2025, following its launch in 2024, marked a significant milestone for our Bank.

A key contributor to our technology and digital capabilities was our subsidiary, Odea Teknoloji Hizmetleri A.Ş. ("Odeatech"). In 2025, as Odeatech scaled its operations, the infrastructure supporting the Bank's technology- and data-driven transformation was further strengthened. Odeatech's efforts in digital banking infrastructure, data management, process automation and artificial intelligence were among the key components supporting Odeabank's phygital banking vision. As we look ahead, this structure will continue to enhance the Bank's competitiveness in terms of customer experience, operational efficiency, risk management and sustainability data infrastructure.

We also achieved measurable progress in our sustainability performance in 2025. We sourced 100% of the electricity consumed in our operations from renewable sources certified by International Renewable Energy Certificates (I-REC). Accordingly, using the market-based method, we reduced our Scope 2 emissions to zero. **Between 2024 and 2025, we achieved an approximately 40% reduction in our Scope 1 and market-based Scope 2 greenhouse gas emissions.** This result reflects our continued commitment to reducing our operational environmental impact and strengthening our transition toward low-carbon operations.

Our sustainability focus extends beyond operational impact. Sustainable financing, environmental and social risk management, the assessment of climate-related risks and opportunities, and strengthening reporting quality are critical components of the Bank's long-term value creation approach. With our separate TSRS Compliant Sustainability Report for the 2025 reporting period, we have further enhanced the transparency and comparability of our disclosures across governance, strategy, risk management, and key metrics.

Under our Human-Centered Banking approach, we continued to make strong progress in employee experience; diversity, equity and inclusion (DEI); and accessibility. In 2025, Odeabank had 1,211 employees on its payroll, while our consolidated employee number, including Odeatech, reached 1,393. On Odeabank's payroll, female employees epresented 57% of the workforce, while the percentage of women in managerial positions was 51.5%. The share of female employees in revenue-generating functions reached 59.8%, while the percentage of female managers in revenue-generating functions reached 59%. These indicators demonstrate the strong reflection of our DEI approach within our corporate culture.

We do not view Human-Centered Banking as something that is limited to employee experience; we also consider it part of our responsibility to respond to the different needs of our customers and society with equal, accessible and inclusive solutions. In this regard, we accelerated our accessibility-focused initiatives to ensure our services are available to everyone, supported by targeted awareness and training programs.

Supporting the development of our employees remained one of our key priorities that strengthened our transformation capacity. **In 2025, our total training hours reached 48,087, with the average training hours per employee standing at 39.7.** Through our learning and development investments, we continued to strengthen our human capital in digitalization, sustainability, leadership, customer experience, data and next-generation competencies. We believe that the Bank's transformation capacity is made possible first and foremost by the knowledge, competencies and commitment of our colleagues to shared goals.

In terms of social impact, we continued to expand the reach of initiatives launched in previous years. **Through our Eşit Masallar (Fair Tales) project, an initiative promoting gender equality through storytelling, we delivered 1.3 million printed copies across 5 books and directly reached more than 200,000 children. The project's total reach increased to 3.56 million, while theater performances reached an audience of more than 100,000 people.**

As part of our investment-oriented banking approach, we continued our efforts to develop and expand financial literacy. Through Odea Radio, our investment-oriented podcast series and content created across our digital channels, we focused on increasing knowledge and awareness about personal finance and investments. Growth in our financial indicators, the strengthening of our capital structure, progress in digital channels, the development of investment products, our use of renewable energy, reductions in emissions, DEI indicators, training investments and social impact initiatives provide clear evidence that sustainability is an integral part of our business model.

Our performance in 2025 confirms the strength of Odea Bank's strategy, which is driven by financial empowerment, responsible transition finance, and human-centered banking.

Looking ahead, we will continue to respond effectively to the changing needs of our customers with our strong capital structure, disciplined balance sheet management, digital and technological capabilities, sustainability performance and Human-Centered corporate culture. We aim to further deepen our banking approach that makes financing a part of long-term value creation and real transformation.

I would like to thank my valued colleagues, customers, business partners and all stakeholders who contributed to achieving these results.

Sincerely,

Dr. Mert Öncü
CEO and Board Member

2025 HIGHLIGHTS

100%
I-REC-CERTIFIED RENEWABLE ELECTRICITY CONSUMPTION
We sourced all of the electricity consumed in our operations from I-REC-certified renewable sources.

40%
REDUCTION IN SCOPE 1 AND SCOPE 2 EMISSIONS
Compared with 2024, we achieved a 40% reduction in our total market-based Scope 1 and Scope 2 greenhouse gas emissions.

TRY 447 MILLION
GREEN TRANSITION FINANCE
We provided green transition financing totalling TRY 447 million.

~250,000
DIGITAL BANKING CUSTOMERS
Our digital banking customer base continued to grow.

TRY 101.6 BILLION
VOLUME OF NON-DEPOSIT ASSETS UNDER MANAGEMENT
We increased our non-deposit assets under management to over TRY 101.6 billion.

16.3%
CAPITAL ADEQUACY RATIO
We maintained a strong capital adequacy ratio of 16.3%.

57%
WOMEN IN THE WORKFORCE
We continued to maintain a share of women employees above the sector average.

1.3 MILLION
FAIR TALES BOOKS DISTRIBUTED CUMULATIVELY
To date, the project has directly reached more than 200,000 children and a total audience of 3.56 million people.

UNGC
GLOBAL COMMITMENT TO RESPONSIBILITY
We became a signatory to the UN Global Compact.

PCAF
FINANCED EMISSIONS
We became a signatory to the PCAF (Partnership for Carbon Accounting Financials)

About Odeabank

ODEABANK AT A GLANCE

We continue to create long-term value through our strengthened capital structure following ADQ's investment, our investment-focused banking approach, and our commitment to digital transformation.

OUR STRATEGIC POSITIONING

At Odeabank, we continue to enhance our investment-focused banking approach by combining digitalization, a data-driven customer experience, and a focus on sustainable growth. Supported by our strong capital base, technology investments, and human-centered service model, we aim to deliver long-term financial solutions that address the evolving needs of both individuals and businesses.

Established in 2012, Odeabank initially focused on commercial banking and has since expanded its capabilities across retail banking, investment products, and wealth management. Backed by a strong capital structure and a customer-focused approach, the Bank has maintained a trajectory of sustainable growth.

Through our broad portfolio of services, ranging from lending solutions to digital banking applications, we provide our customers with an integrated financial experience. Guided by our **"You Are at the Center of Investment"** philosophy, we continue to expand our range of investment-focused products and services.

As part of our digital transformation strategy, we have developed our "phygital banking" approach, integrating financial advisory services with our digital channels to provide customers with an accessible, data-driven, and seamless banking experience.

TRY **123** Billion Total Assets

19% Increase in Mobile Transaction Volume

35 Branches

TRY **101.6** Billion Non-Deposit Assets Under Management

~250,000 Digital Customers

16.3% Capital Adequacy Ratio

45 ATMs

1,211 Employees

KEY FINANCIAL INDICATORS

Financial Indicators	2024	2025	Growth Rate
Total Assets	79.3	123.0	**55.1%**
Net Loans	29.2	50.0	**71.2%**
Deposits	48.0	70.6	**47.1%**
Securities	26.1	36.7	**40.6%**
Shareholders' Equity	5.6	6.2	**10.7%**

Note: Values are presented in TRY billions.

STRATEGIC TRANSFORMATION WITH ADQ

Following the completion of our shareholder transformation in 2025, Odeabank entered a new phase of growth aligned with ADQ's long-term investment approach and global expertise in financial services.

As part of this transformation, we aim to accelerate our strategic investments in:

- Digitalization
- Customer Experience
- Sustainable Finance
- Data-Driven Transformation

Aligned with ADQ's long-term investment philosophy, we seek to strengthen our access to capital markets, diversify our investor base, and enhance our capacity for sustainable growth.

The capital increase completed during the year further strengthened the Bank's capital adequacy and financial resilience. This transformation represents a strategic milestone supporting our long-term value creation approach.

The Bank's paid-in capital of TRY 5,261,811,049.00 was increased by TRY 4,418,133,377.00 to TRY 9,679,944,426.00 pursuant to the resolution adopted at the Extraordinary General Assembly held on 11 February 2026. Of the capital increase, TRY 4,241,215,510.00 was contributed by ADQ Financial Services LLC and TRY 176,917,867.00 by H.H. Sheikh Dheyab Bin Zayed Bin Sultan Al-Nahyan. The full amount of the capital increase was paid in cash. The capital increase was officially registered on 17 February 2026.

SHAREHOLDING AND CAPITAL STRUCTURE

Name and Surname / Commercial Title
ADQ FINANCIAL SERVICES LLC
Share Amount (TRY)
5,051,109,306
Share Ratios
96%

Name and Surname / Commercial Title
H.H SHEIKH DHEYAB BINZAYED BINSULTAN AL-NAHYAN
Share Amount (TRY)
210,701,739
Share Ratios
4%

Name and Surname / Commercial Title
FLASH INVESTMENT HOLDİNG 1 RSC LTD
Share Amount (TRY)
1
Share Ratios
0.0000%

Name and Surname / Commercial Title
FLASH INVESTMENT HOLDING 2 RSC LTD
Share Amount (TRY)
1
Share Ratios
0.0000%

Name and Surname / Commercial Title
FLASH INVESTMENT HOLDİNG 3 RSC LTD
Share Amount (TRY)
1
Share Ratios
0.0000%

Name and Surname / Commercial Title
FLASH INVESTMENT HOLDİNG 4 RSC LTD
Share Amount (TRY)
1
Share Ratios
0.0000%

TOTAL
Share Amount (TRY)
5,261,811,049
Share Ratios
100.00%

Members of the Board of Directors and senior management are not shareholders of the Bank.

**All amounts in the table are presented in full Turkish lira (TRY).*

ABOUT ADQ

Established in 2018, ADQ is an active sovereign investment company focused on critical infrastructure and global supply chains. As a strategic partner of the Government of Abu Dhabi, ADQ invests in the growth of business platforms that create value for local communities across the Emirate while delivering sustainable long-term financial returns to its shareholder. As of 30 June 2025, ADQ managed total assets of 263 billion USD. Its rapidly expanding portfolio spans a broad range of strategic sectors, including energy and utilities, transport and logistics, food and agriculture, healthcare and life sciences, financial services, infrastructure and critical minerals, and sustainable manufacturing.

odeatech

About Odeatech

We position Odeatech as our strategic technology platform, strengthening our competitive advantage in digital transformation, data analytics, artificial intelligence, and process automation.

During 2025, we continued to scale our research and development and technology capabilities while enhancing our operational efficiency and customer experience through solutions that support our data-driven banking approach.

With a department of more than 150 R&D professionals, we further strengthened our technology development capabilities, focusing on enhancing our digital banking infrastructure, data management capabilities, and innovation capacity.

Through fintech ecosystem collaborations and a technology infrastructure aligned with robust information security standards robust information security standards, we continue to build a sustainable technology ecosystem that supports our agile, innovative, and data-driven transformation strategy.

For more information, please visit *Odeatech*

OUR BUSINESS MODEL

At Odea Bank, our customer-centric, solution-driven business model enables us to deliver sustainable financial solutions that meet the evolving needs of individuals and businesses. Guided by our value creation approach, we continuously enhance our financial services to keep pace with the economic and technological dynamics shaping the future.

COMMERCIAL BANKING

As of 2025, we continued to provide Commercial Banking services across 10 locations in eight provinces, comprising five Commercial Banking Centers and five Commercial Banking Branches, supported by our specialized departments.

Within our Commercial Banking operations, we prioritize delivering responsive, solution-oriented financing tailored to our customers' evolving needs. While strengthening the satisfaction of our existing customers, we also focus on building long-term, sustainable customer relationships through new customer acquisition.

Through a comprehensive portfolio of products and services, including cash loans, trade finance, letters of guarantee, and cash management solutions, we address our customers' financial needs holistically while supporting the growth and transformation of businesses operating across a wide range of industries.

In 2025, we continued to enhance our Commercial Banking infrastructure in line with our digitalization and data-driven transformation strategy. By strengthening our digital channels for commercial customers and implementing user experience and process improvements, we further increased our operational efficiency.

As part of our sustainable finance approach, we continued to expand financing solutions supporting energy efficiency, renewable energy, and low-carbon transition investments. Through structured financing solutions designed for exporters, women entrepreneurs, and businesses across diverse sectors, we aimed to contribute to our customers' long-term growth objectives.

For more detailed information on our Commercial Banking operations, please refer to pages *24–27 of the Odeabank 2025 Annual Report.*

ODEABANK HEADQUARTERS

RETAIL BANKING

Within our Retail Banking business line, we continued to strengthen the structures supporting high-quality service across all customer touchpoints nationwide, leveraging our experienced teams. Our objective is to build long-term, trust-based relationships by responding to our customers' evolving financial needs.

Guided by our "You Are at the Center of Investment" philosophy, we increased the number of customers holding non-deposit investment products by 6,9% in 2025, while expanding our non-deposit assets under management by 48,6%, helping customers diversify their financial assets and create long-term value. By developing products and services tailored to customer segments with varying risk profiles, we further strengthened financial inclusion and our human-centered value creation model.

We increased our Turkish lira-denominated fund volume by 60.5%, reaching TRY 94.2 billion. At the same time, we continued to enhance our investment-focused customer experience by offering products and services tailored to customers with different risk profiles.

Through personalized financial advisory services, a broad range of investment products, and our digital banking applications, we continued to deliver an accessible and integrated banking experience. We further enhanced customer experience by offering free EFT and money transfers through digital channels, free cash withdrawals from domestic ATMs, segment-based solutions, and personalized services.

We also continued to enhance our remote customer onboarding process, achieving a 22% year-on-year increase in account openings completed via video calls. By integrating our financial advisory services with our digital banking applications, we continued to deliver our phygital banking experience to customers.

For more detailed information on our Retail Banking products and services, please refer to pages *28–35 of the Odeabank 2025 Annual Report.*

Through our investment-focused retail banking approach, we provide our customers with a personalized, accessible, and integrated financial experience.

ODEABANK HEADQUARTERS

HOW WE CREATE VALUE?

OPERATING CONTEXT

- Rapidly evolving technology and digital transformation
- Climate crisis and increasing natural disasters
- Regulations, transparent reporting and shift toward green finance
- Rising need for sustainable finance Increasing demand for digital solutions in customer expectations
- Strengthening focus on cybersecurity and data analytics
- Access to skilled workforce becoming a competitive advantage
- Increasing responsibilities around social inequalities, inclusion and gender equality

	INPUTS	OUTPUTS	RELATED MATERIAL TOPICS
INTELLECTUAL CAPITAL	Data analytics and cybersecurity systems Digital banking infrastructure and applications More than 150 employees focused on R&D and innovation Odeatech technology capabilities	New digital products and services Smart investment advisor Rob'O ~250,000 Digital Banking Customers Increased transaction speed through digitalization Innovative financial solutions through open banking applications and FinTech collaborations	- Digital transformation - FinTech and innovation - Cybersecurity and data security - Customer experience - Risk management
NATURAL CAPITAL	3,885 MWh Net Energy Consumption 3,885 MWh Net Energy Consumption 4.1 million TL environmental investments and expenditures Efficient use of natural resources Elimination of single-use plastics at the Head Office Management approach focused on climate risks and opportunities Rooftof solar panel system installation at 2 branches Collaboration with Erişilebilir Her Şey	40% reduction in Scope 1 + 2 emissions 65,197.44 MWh Energy Savings in 2025 100% I-REC-certified renewable electricity consumption Energy efficiency through LED transformation across all branches Environmental and Social Risk Assessment for all commercial loans Increase in internal awareness through the Sustainability Ambassadors Program 1,484 employees participating in employee development programs Total of 447 million TL loans provided for green transition	- Financing of the low-carbon economy - Environmental impact - Renewable energy - Circular economy - Responsible products and services
SOCIAL AND RELATIONSHIP CAPITAL	Collaborations with Mutlu Patiler, Koruncuk and Anne Çocuk Vakfı Sponsorship of the Istanbul Theatre Festival under the theme "There Is a Woman in This" for 5 years Collaborations with national and international organizations Investment-focused podcast with Odea Odea Radyo, the first and only digital bank radio Customer Communication Center with an expert team of 98 people 685 suppliers Odea Investment-Focused Banking Application	• Retail banking NPS Score 31 • Private banking NPS Score 52 • Eşit Masallar book printed 1.3 million books, reaching more than 200,000 kids • Odea Radyo had around 3.5 million listeners • 94.45% local supplier ratio • 6,523 resolved customer complaints • Customer Communication Center call answer rate 97% • Average customer complaint resolution time of 1.5 days • Signatory to the UN Global Compact	- Cybersecurity and data security - Customer experience - Business ethics, compliance and anti-corruption - Corporate governance - Financial literacy and digital literacy - Financial inclusion - Prevention of financial crimes - Social investment programs - Responsible products and services
MANUFACTURED CAPITAL	Odea Investment-Focused Banking Application 35 branches and 45 installed ATMs Our technology subsidiary Odeatech Mobile and internet banking infrastructure	Approximately 250,000 active digital channel users +540,000 mobile application downloads 250,000 digital touchpoints 22% increase in account openings through video calls 19% increase in mobile transaction volume	- Digital transformation - FinTech and innovation - Renewable energy
FINANCIAL CAPITAL	123 billion TL Total Assets (55% Increase) 16.3% Capital Adequacy Ratio ADQ joining our Bank as a shareholder	60.5% increase in fund volume 71% growth in total cash loans TRY 52.9 billion in cash loans, including NPLs, and TRY 32.9 billion in non-cash loans Net loans of 50 billion TL Deposits of 70.6 billion TL Gross loan amount of 52.9 billion TL Average return on equity -31.78% Gross loan/deposit ratio 74.99% 101.6 billion TL non-deposit asset management volume	- Financing of the low-carbon economy - Risk management - Financial inclusion - Prevention of financial crimes
HUMAN CAPITAL	1,211 employees, with Odeatech included 1,393 Employee capability development programs (OdeaStellar, Nova Staj, O'lider) 375 newly hired employees	57% female employee ratio 51.5% female manager ratio Hybrid working model 39.7 training hours per employee 35.5% ratio of women employees in STEM positions Contribution to employee engagement	- Diversity, equity and inclusion - Talent management - Employee health, wellbeing and safety - Financial literacy and digital literacy

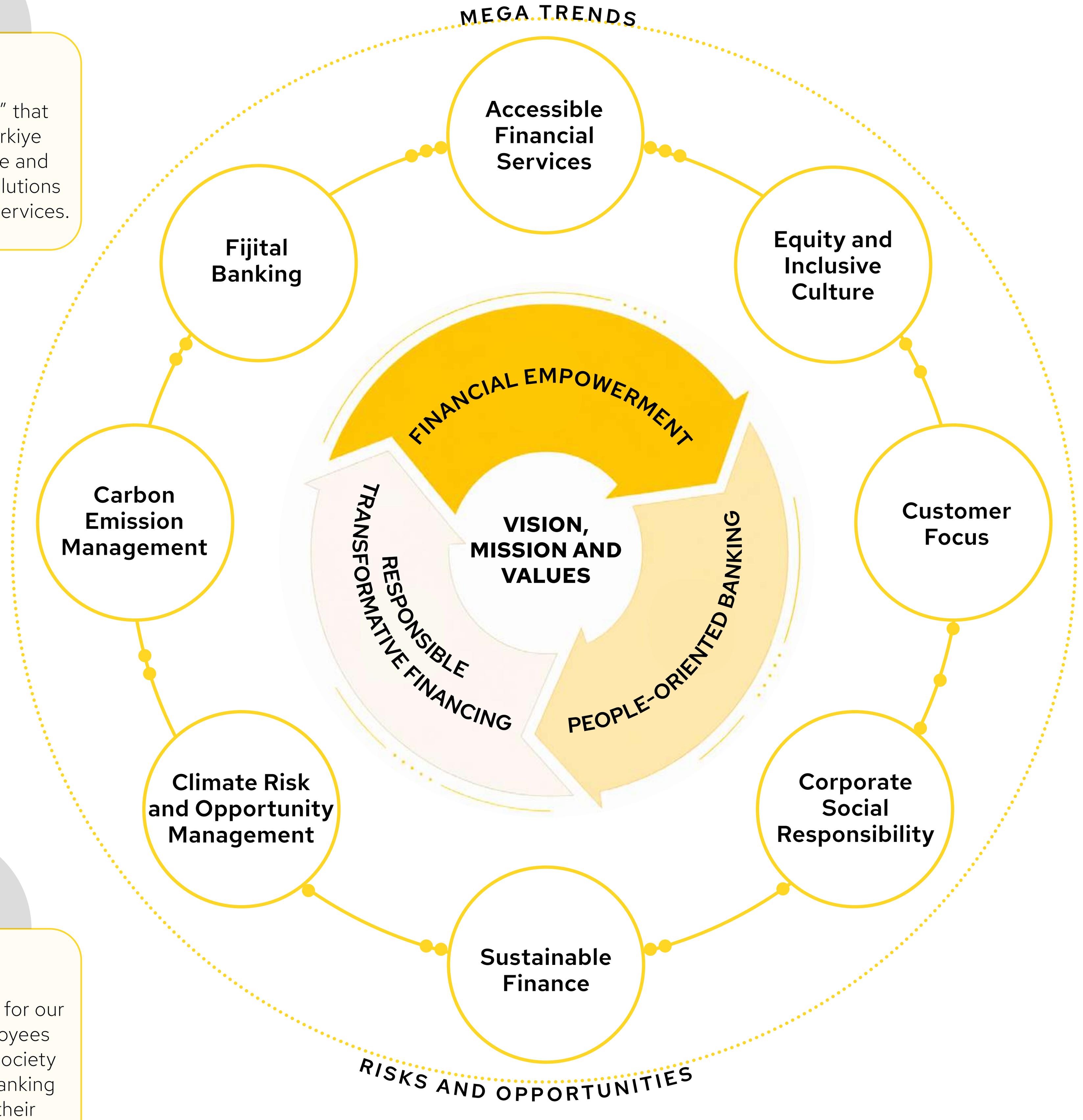
OUR VISION

To be a "digital bank" that creates value for Türkiye by offering innovative and distinctive financial solutions with superior physical services.

OUR MISSION

To create added value for our customers and employees and to contribute to society by addressing their banking needs and solving their financial challenges.

"Empowering and Transformative Banking"



OUR VALUES

AGILITY
We adapt quickly to change, embrace innovation, and act fast to deliver effective solutions.

CUSTOMER FOCUS
We understand our customers' needs deeply and offer tailored solutions that create meaningful and lasting value.

TRANSPARENCY
We communicate openly and honestly, act with integrity, and build trust through clear and consistent actions.

RESPECT
We respect every individual, their opinions, and their differences, creating a diverse and inclusive work.

OUR STRATEGIC OBJECTIVES

FOR OUR CUSTOMERS
To be the first choice for our customers by offering the right solutions at the right time through an innovative and customer-centric approach.

FOR OUR EMPLOYEES
To be a bank that our employees are proud to be a part of, where they can develop themselves, feel valued, and contribute by leveraging their potential.

FOR OUR SOCIETY
To be a bank that contributes to the economic development of society, supports environmental sustainability, and promotes social well-being.

FOR OUR SHAREHOLDERS
To be a bank that provides technology-driven, profitable, sustainable growth and creates long-term value for our shareholders.

RELATED STRATEGIC FOCUS AREAS	VALUE CREATED	FACTORS SHAPING VALUE CREATION	RELEVANT STAKEHOLDERS	CONTRIBUTION TO THE SDGs
- Financial Empowerment - Human-Centered Banking	• Improving service quality and customer experience through data analytics, cybersecurity and digital infrastructure • Increasing competitiveness through technology by accelerating digital transformation with R&D and innovation • Increasing financial inclusion and facilitating access through digitalization	- Cybersecurity threats - Data privacy risks - Technological infrastructure continuity - Increasing digital competition	- Customers - Employees - FinTechs and technology business partners - Regulators - Investors	
- Responsible Transition Finance	• Contributing to the transition to a low-carbon economy by reducing the carbon footprint • Integrating climate risks into our financial system • Supporting customers in their sustainable transition through responsible products and services • Facilitating the transformation of the business world • Creating long-term social and environmental value • Efficient resource use and cost reduction • Contributing to combating climate change • Creating environmental awareness	- Climate transition risks - Physical climate risks - Energy and resource costs - Environmental regulatory compliance risk	- Corporate and commercial customers - Regulators - Investors - Employees - Society - Suppliers	
- Human-Centered Banking - Financial Empowerment	• Contributing to the low-carbon economy by reducing the carbon footprint • Integrating climate risks into our financial system • Expanding access to financial services and supporting financial inclusion • Strengthening employee capabilities, engagement and an inclusive corporate culture • Increasing social benefit through the local supplier ecosystem, collaborations and social investment programs • Improving operational efficiency and service quality through digitalization, data analytics and technology investments • Contributing to the real economy, production and exports through a strong capital structure and lending capacity	- Changing customer expectations - Reputational risk - Supply chain continuity - Weakening of stakeholder trust	- Customers - Suppliers - NGOs - Society - Employees - Business partners - Local economy	
- Financial Empowerment - Human-Centered Banking	• Increasing the accessibility of banking services • Improvement in service quality • Increase in operational efficiency through digital channels • Expansion of financial services	- Operational continuity risk - Digital and physical channel alignment risk - Technological infrastructure outages - Service accessibility risk	- Customers - Employees - Regulators - Technology business partners - Investors	
- Financial Empowerment - Responsible Transition Finance	• Contributing to economic growth by managing financial capital effectively • Increasing our financial resilience through our strong capital structure • Making a long-term contribution to development by supporting export-oriented sectors	- Macroeconomic volatility - Credit risk - Liquidity and capital adequacy risk - Regulatory changes - Climate-related financial risks	- Customers - Investors / shareholders - Regulators - Real sector - Society - International financial institutions	
- Human-Centered Banking - Financial Empowerment	• Developing competent and agile teams by increasing employee satisfaction • Supporting diversity through our strong leadership capacity and inclusive working environment • Attracting young talent to the sector • Creating social benefit and strengthening our reputation	- Talent attraction and retention risk - Employee engagement risk - Skills transformation adaptation risk - Occupational health, safety and wellbeing risks	- Employees - Candidate employees - Customers - Society - Educational institutions - Management teams	

Empowering and Transformative Banking

OUR STRATEGY AND MATERIALITY TOPICS

Our “Empowering and Transformative Banking” approach provides a strategic framework that brings together economic resilience, the transition to a low-carbon economy, digital transformation, inclusivity, a people-centered culture, and robust governance.

At Odeabank, we view sustainability not merely as an environmental and social responsibility agenda, but as a strategic management approach that supports long-term value creation, financial resilience, trust-based banking, and our customers' transformation journeys.

Recognizing the banking sector's financing capacity, ability to influence capital allocation, and multiplier effect, we prioritize managing not only the environmental and social impacts arising from our own operations but also those generated through our customers, products and services, value chain, and financing operations through a holistic approach.

Through this approach, we position the transformative power of finance as a means of creating value by responding to our customers' evolving needs, supporting social well-being, and contributing to sustainable development.

THE EVOLUTION OF OUR SUSTAINABILITY STRATEGY

In 2023, we launched a comprehensive strategy development process to establish a more systematic, measurable, and impact-oriented sustainability approach. As part of this process, we reviewed our sustainability priorities in line with the Bank's vision, mission, business model, and stakeholder expectations, while conducting a detailed gap analysis to identify areas for improvement between our existing practices and international best practices.

In developing our strategic framework, we looked beyond internal assessments. We analyzed the sustainability approaches of national and international financial institutions, sector trends, regulatory developments, investor expectations, and sustainability index criteria. Based on these analyses, we identified the priority areas through which Odeabank could most effectively manage its environmental, social, and governance impacts, while strengthening responsible ownership, monitoring mechanisms, and performance indicators for each area.

In 2024, we reassessed our sustainability strategy in line with the double materiality approach. Accordingly, we evaluated not only the Bank's impacts on the environment, society, and stakeholders, but also the effects of sustainability-related matters on our business model, financial performance, risk profile, operational resilience, and long-term value creation capacity through an integrated perspective.

In 2025, we adopted the principles of integrated thinking and integrated reporting, strengthening the connection between our sustainability initiatives and our value creation model. This enabled us to make the relationship between our financial performance and our environmental, social, and governance performance more transparent, while creating a more integrated framework linking our strategy, materiality topics, risks, opportunities, performance indicators, and societal impact.

This journey demonstrates that our sustainability strategy is not merely a framework of annual initiatives, but a dynamic management approach that evolves alongside our business model, the capitals we rely upon, stakeholder expectations, and our long-term value creation approach.

OUR EMPOWERING AND TRANSFORMATIVE BANKING STRATEGY

Rapid technological advancement, the climate crisis, natural disasters, evolving regulatory expectations, and changing societal needs are redefining the role of the banking sector. At Odeabank, we respond to this transformation through a banking model that provides customers with future-ready financing solutions while supporting the green, technological, and digital transition through an inclusive, trust-based approach.

In line with our mission, we aim to simplify banking through our distinctive products and expertise while contributing to sustainable development through a strong sense of social responsibility.

We have structured our strategy around three strategic focus areas namely Financial Empowerment, Responsible Transition Finance, and Human Centered Banking. Our initiatives and performance across these focus areas are presented in the relevant sections of this report under *"Performance and Areas for Progress"*.

EMPOWERING AND TRANSFORMATIVE BANKING			
STRATEGIC AREA	**FINANCIAL EMPOWERMENT**	**RESPONSIBLE TRANSITION FINANCE**	**HUMAN-CENTERED BANKING**
Our Strategic Approach	We strengthen our customers' access to financial services through digital, innovative, and data-driven solutions.	We develop financing solutions that support the transition to a low-carbon economy.	We create inclusive and sustainable value for our employees, customers, and society.
Strategic Focus Areas	Digital banking solutions; data-driven customer experience; fintech partnerships; AI-enabled processes; financial inclusion	Sustainable finance products; renewable energy finance; transition finance approach; responsible products and services; environmental impact management	Employee experience and well-being; diversity, equity and inclusion; talent management; community investment programs; financial and digital literacy
Related Capitals	Financial Capital; Manufactured Capital; Intellectual Capital	Natural Capital; Financial Capital	Human Capital; Social and Relationship Capital
Related Materiality Topics	Digital transformation; customer experience; fintech and innovation; cybersecurity and data security; risk management; financial and digital literacy; financial inclusion; prevention of financial crime	Financing the low-carbon economy; responsible products and services; environmental impact; renewable energy; circular economy; risk management	Diversity, equity and inclusion; talent management; employee health, well-being and safety; business ethics, compliance and anti-corruption; community investment programs; corporate governance
SDGs Supported	1 NO POVERTY; 8 DECENT WORK AND ECONOMIC GROWTH; 9 INDUSTRY, INNOVATION AND INFRASTRUCTURE; 17 PARTNERSHIPS FOR THE GOALS	7 AFFORDABLE AND CLEAN ENERGY; 12 RESPONSIBLE CONSUMPTION AND PRODUCTION; 13 CLIMATE ACTION; 17 PARTNERSHIPS FOR THE GOALS	4 QUALITY EDUCATION; 5 GENDER EQUALITY; 10 REDUCED INEQUALITIES; 17 PARTNERSHIPS FOR THE GOALS
Performance Linkage	Measured through indicators related to digitalization, customer experience, financial inclusion, data security, and operational resilience.	Measured through sustainable finance, green lending, environmental impact, emissions management, climate risk, and environmental and social risk assessment indicators.	Measured through employee experience, learning and development, diversity, employee health and safety, financial literacy, and social impact indicators.

OUR APPROACH TO LINKING MATERIALITY TOPICS WITH STRATEGY

When grouping our materiality topics under our three strategic focus areas, we consider each topic's impact on our business model, its environmental and social impacts on our stakeholders, its contribution to our financial resilience, and its relationship with our long-term value creation capacity.

This approach enables us to treat our materiality topics not merely as reporting categories, but as management priorities integrated into our strategy, governance, risk management, performance monitoring and decision-making processes.

Strategic Linkage	Management Approach
Business Model Linkage	We assess the impacts of our materiality topics on our banking operations, products and services, customer relationships and operational processes.
Impact Linkage	We consider the impacts of our operations on the environment, society, employees, customers and our value chain.
Financial Linkage	We evaluate the effects of our materiality topics on financial performance, risk profile, funding capacity, portfolio quality and operational resilience.
Performance Linkage	We link our materiality topics to our (KPIs*) framework and performance indicators, enabling more effective monitoring of progress.

**KPI: Key Performance Indıcators. Refers to the key indicators used to monitor and measure the organization's performance against its defined objectives.*

STAKEHOLDER OPINION

Burcu Akın Öztemel

Senior Manager of Financial Institutions, Funding and Sustainability, Odeabank

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In 2025, sustainability at Odeabank evolved from being just a reporting topic into a shared way of working across the organization.

Our strengthened long-term perspective, supported by our shareholder ADQ, has further reinforced the way we approach sustainability. Throughout the year, we worked to strengthen our capabilities in TSRS-compliant reporting while also advancing our work on climate-related risks and opportunities, data management, measurement and sustainable finance. Together, these efforts reinforced an important insight: sustainability creates meaningful impact only when it is embraced across the organization.

For us, building a culture of sustainability does not begin with setting ambitious goals. It begins with embedding a long-term perspective into our everyday decision-making. Whenever we make a decision, we ask ourselves a simple yet important question: What will the long-term impact be?

When sustainability is mentioned, reports, targets and strategy documents often come to mind. Yes, these are all essential. However, real impact comes from integrating this mindset into the way we work every day.

With this understanding, we approached sustainability throughout 2025 as a shared way of doing business rather than a topic owned by specific departments. From Risk Management and financing to Human Resources, Customer Experience, Digital Transformation and Operations, we positioned sustainability as a common approach that supports the way we operate across the Bank.

ADQ's strong commitment to sustainability and its long-term approach has brought a valuable perspective to our sustainability journey. This shared vision encouraged us to integrate sustainability more closely into our business decisions through a more systematic, measurable and structured approach.

Preparing a comprehensive sustainability report requires considerable dedication and effort. Yet the greatest value lies in the learning process it creates across the organization.

Through close collaboration among different departments, we strengthened our data management practices and enhanced our methodological alignment. We continued to develop our institutional capabilities in areas such as TSRS-compliant reporting, climate-related risks and opportunities, as well as environmental and social impacts. While preparing our report, we were also building a shared language around sustainability across the organization. We believe this collective progress is one of our most valuable achievements.

Sustainability remains limited when it is regarded as a specialist field understood by only a few. Its real impact emerges when it is understood across the whole organization, embraced by our stakeholders and embedded into our everyday decision-making.

Throughout 2025, we expanded this culture through our training programs, awareness initiatives and online learning opportunities. Our aim is to make sustainability not a separate topic, but rather a natural part of how we conduct business day to day.

BUILDING BLOCKS OF OUR STRATEGY

We reinforce our strategic focus areas with the foundational pillars that enable our banking operations to remain secure, resilient and accountable.

Building Block	Strategic Contribution	Monitoring Areas
Cybersecurity and Data Security	Represents our security approach that safeguards our information assets, customer trust and operational resilience.	Information security practices, data protection processes, incident management and business continuity initiatives
Business Ethics and Compliance	Strengthens our trust-based banking approach, ethical business culture and regulatory compliance framework.	Ethical principles, compliance processes, anti-bribery and anti-corruption practices, and whistleblowing mechanisms
Risk Management	Supports long-term value creation by ensuring the integrated management of financial and non-financial risks.	Credit risk, operational risk, climate-related risks, and environmental and social risk management
Corporate Governance	Supports transparency, accountability, effective decision-making processes and sustainability governance.	Board of Directors and committee structure, sustainability governance, policies and procedures, and performance monitoring

These building blocks are discussed in greater detail under the *"Data Security and Cyber Resilience"*, *"Risks, Opportunities and Resilience"*, *"Corporate Governance and Our Sustainability Governance"*, and *"Our Ethics and Compliance Approach"* sections of this report.

FROM STAKEHOLDER EXPECTATIONS TO STRATEGIC PRIORITIES

In shaping our sustainability strategy, we evaluate stakeholder expectations alongside industry transformation trends, regulatory developments and the Bank's long-term value creation objectives. This approach ensures that our strategic priorities are aligned not only with our internal agenda but also with the evolving expectations of our customers, employees, investors, regulators, business partners, suppliers and society.

A SECURE, ACCESSIBLE AND DIGITAL BANKING EXPERIENCE

Under our Financial Empowerment strategic focus area, we continue to strengthen our digital customer experience, data security, customer experience and financial inclusion initiatives.

SUPPORTING THE TRANSITION TO A LOW-CARBON ECONOMY

Under our Responsible Transition Finance strategic focus area, we further develop our sustainable finance, green transformation, climate risk, and environmental and social risk management practices.

AN INCLUSIVE WORKPLACE AND POSITIVE SOCIAL IMPACT

Under our Human-Centered Banking strategic focus area, we promote diversity, equity and inclusion, employee experience, financial literacy and social impact initiatives.

TRANSPARENT, ETHICAL AND ACCOUNTABLE GOVERNANCE

We reinforce our trust-based banking approach through our core pillars of corporate governance, ethics and compliance, risk management and sustainability governance.

FROM STRATEGY TO PERFORMANCE

We do not limit our strategy to commitments alone; we regularly monitor our materiality topics, performance indicators and areas for improvement. Accordingly, we assess our sustainability performance across environmental, social and governance dimensions, while also considering risk management, digital resilience, financial inclusion, sustainable finance, employee experience and social impact.

In 2025, we strengthened our sustainability governance structure, working groups and data collection processes to foster greater ownership of our strategic priorities across business units. Going forward, we aim to monitor our sustainability performance through a more measurable and comparable framework that is more closely integrated with our decision-making processes.

Accordingly, this section should be read together with the *KPI Map for Materiality Topics* and *Performance and Areas for Progress* sections. These sections provide a more detailed overview of how our materiality topics are linked to the key KPIs we monitor and the areas on which we focus for continuous improvement.

OUR STRATEGIC DEVELOPMENT FOCUS FOR 2026 AND BEYOND

In the coming years, supported by our strong shareholder structure, disciplined balance sheet management and sustainable finance capabilities, we aim to further strengthen a banking model that responds to our customers' evolving needs, incorporates climate and transition risks into decision-making and delivers long-term value creation.

To achieve this, we plan to enhance our strategic focus in the following areas:

Development Area	Focus
Strategy and KPI Integration	Strengthening the alignment of materiality topics with our KPI framework, performance indicators and senior management objectives.
Data Ownership and Reporting Quality	Enhancing business unit ownership of sustainability data while improving data quality and comparability.
Climate and Portfolio Transition	Further advancing initiatives related to sustainable finance, green lending, climate risk, the GAR, PCAF and CDP.
Social Impact and Inclusion	Developing a more measurable impact approach across financial literacy, accessible banking, employee experience, diversity and social impact initiatives.
Value Chain Management	Integrating environmental and social criteria more systematically into supplier management and procurement processes.

STAKEHOLDER OPINION

Emir ALPAY

AGM in the charge of Treasury, Capital Markets and Financial Institutions, Odeabank

Today, strength in banking is measured not only by the ability to provide capital but also by the vision, priorities, and impact that guide how capital is allocated.

Today, businesses need more than access to finance. They need banking partners that can help them prepare for the future with greater confidence. Market uncertainty, technological transformation, climate related risks, evolving regulations, and changing customer expectations are reshaping investment decisions, growth strategies, and competitive advantage.

As this landscape continues to evolve, the role of banks is evolving with it. Banking today is about directing the right financial resources to the right needs at the right time while enabling transformation that creates lasting value.

At Odeabank, this perspective shapes our sustainability strategy. Strong balance sheet management, a resilient liquidity position, diversified funding sources, and disciplined risk management represent far more than financial performance indicators. They provide the foundation that enables us to stand alongside our customers as a trusted long term partner with a clear focus on delivering solutions.

The year 2025 marked an important milestone for Odeabank. With ADQ becoming our majority shareholder, we not only strengthened our capital structure but also enhanced our ability to pursue a broader vision, take a longer term perspective, and make better use of international opportunities.

As we enter this new chapter, we do not measure growth solely by the size of our balance sheet. We believe that the quality of growth, its sustainability, and the value it creates for our customers are every bit as important as growth itself.

For this reason, we place our Empowering and Transformative Banking approach at the center of our strategy. While helping our customers strengthen their financial position, we also support their digital transformation, improve operational efficiency, facilitate their transition to a low-carbon economy, and help them adapt to changing market conditions.

Our activities across treasury, capital markets, and financial institutions strengthen this approach. Reliable funding sources, strong market relationships, and effective capital management enable us to reinforce the resilience of our Bank while ensuring the continuity and long term impact of the solutions we provide to our customers.

For us, sustainability is a natural extension of our commitment to creating long term value. As we manage our resources, we consider not only the needs of today but also the risks, opportunities, and transformation requirements that our customers will face in the future.

Looking ahead, our priorities remain clear. By combining our strong capital base, disciplined approach to risk management, and international perspective, we aim to play an even stronger role in supporting our customers throughout their transformation journeys.

We believe that the bank of the future will be defined not only by its ability to provide financing but also by its ability to help customers understand change, capture new opportunities, and build resilience in an increasingly uncertain world. At Odeabank, we will continue to use our financial strength to create long term value for our customers, our stakeholders, and the economy.

Scan the QR code to *watch our executive's video message* on stakeholder engagement.

OUR DOUBLE MATERIALITY ASSESSMENT

HOW WE DETERMINE OUR STRATEGIC PRIORITIES?

At Odeabank, we view sustainability not merely as a reporting obligation or a collection of standalone initiatives, but as a core management discipline that shapes our business model, strategic decision-making, risk management and value creation approach.

Accordingly, when identifying our materiality topics, we assess both the impacts of our operations on the economy, the environment and society, and the implications of these topics for the Bank's financial performance, resilience and long-term value creation capacity.

Our Double Materiality Assessment enables us to evaluate sustainability topics not only from the Bank's perspective, but also in terms of the impacts our operations, financing decisions, products and services, and value chain have on our stakeholders and the broader ecosystem.

Through this approach, we:

- Aligning our sustainability agenda with our corporate strategy.
- Evaluating our material topics through the lens of impacts, risks, and opportunities.
- Shaping our reporting scope in line with our strategic priorities.
- Defining our performance indicators and areas for improvement more clearly.
- Making the value we create for our stakeholders more transparent and measurable.

OUR DYNAMIC DOUBLE MATERIALITY APPROACH

The significance of sustainability topics evolves over time in response to changing regulatory expectations, market dynamics, technological developments, the climate crisis, stakeholder expectations and financial conditions.

For this reason, we do not regard our materiality assessment as a static exercise conducted for a single reporting period. Instead, we treat it as a dynamic process that is reviewed regularly and continuously refined to reflect emerging risks, opportunities and evolving business priorities.

Approach	What It Means for Odeabank
Double Materiality	Enables us to assess both the Bank's impacts on the environment and society and the financial implications of sustainability-related matters for the Bank.
Dynamic Materiality	Enables us to monitor how the significance of materiality topics may evolve over time in response to regulatory developments, market conditions, stakeholder expectations and emerging risks.
Integrated Thinking	Enables us to link our materiality topics with our strategy, value creation model, capitals, risk and opportunity management, and performance indicators.

Our Double Materiality Assessment is based on two key dimensions:

IMPACT MATERIALITY

Assesses the actual or potential environmental and social impacts of Odeabank's operations, products and services, financing operations, employees, customers, suppliers and the wider community.

Impact Materiality
+
Financial Materiality
=
Material Topics

FINANCIAL MATERIALITY

Assesses the actual or potential impacts of sustainability-related matters on Odeabank's financial performance, business model, strategic objectives, risk profile, funding capacity, portfolio quality and long-term value creation.

OUR MATERIALITY ASSESSMENT PROCESS

We follow a structured and multi-dimensional assessment process to identify our materiality topics. The process is based on the combined evaluation of information obtained from both internal and external sources.

Process Step	Scope and Purpose
1. Identification of Potential Topics	Identifying sustainability topics that may be material to the banking sector and Odeabank.
2. External Trends and Sector Analysis	Reviewing global risks, sustainability standards, regulatory developments, ESG rating criteria and industry best practices.
3. Assessment of Stakeholder Input	Analyzing the priorities, expectations and key concerns identified by internal and external stakeholder groups.
4. Impact Assessment	Evaluating the positive and negative impacts of each topic on society and the environment based on the magnitude, scope and likelihood of the impact.
5. Financial Materiality Assessment	Assessing the implications of each topic for Odeabank in terms of financial impact, risks, regulatory requirements, innovation opportunities and competitive advantage.
6. Management Review	Incorporating the views of the Board of Directors and senior management to evaluate the alignment of materiality topics with the Bank's strategy.
7. Materiality and Reporting Linkage	Linking the assessment results to the report structure, strategic themes, KPI framework and performance indicators.

Through this process, our materiality assessment becomes more than a standalone analysis for this section; it serves as a foundational framework that shapes the overall structure of the report, our performance narrative, and our management approach.

INPUTS USED IN OUR MATERIALITY ASSESSMENT

Our double materiality assessment is informed not only by internal evaluations but also by industry trends, international standards, regulatory developments, stakeholder expectations, and management perspectives.

As a first step, we conducted a comprehensive literature review covering the most relevant sustainability issues for the banking sector and established a long list of 19 topics. In defining the universe of topics, we considered global sustainability standards, industry reports, regulatory frameworks, ESG rating methodologies, investor expectations, and banking sector best practices.

Our external trend analysis drew upon national and international sources, including the World Economic Forum Global Risks Report, the S&P Corporate Sustainability Assessment (CSA), the MSCI ESG Rating Methodology, the United Nations Environment Programme Finance Initiative (UNEP FI) Principles for Responsible Banking, the SASB Materiality Map, the Banking Regulation and Supervision Agency (BRSA) Sustainable Banking Strategic Plan, and sectoral guidance on climate-related financial risks.

As part of our stakeholder assessment, we considered the perspectives of nine stakeholder groups, including employees, suppliers, customers, public institutions, universities, and non-governmental organizations. Their expectations, priorities, and views on sustainability issues relevant to Odeabank were analyzed and incorporated into the materiality assessment.

Within the impact assessment, the positive and negative impacts of each topic on society and the environment were evaluated based on the magnitude, scope, and likelihood of occurrence. This ensured that the assessment reflected not only the Bank's perspective but also the impacts on external stakeholders and the broader ecosystem.

From a financial materiality perspective, each topic was assessed in terms of its financial implications, associated risks, regulatory requirements, innovation opportunities, and competitive advantages for Odeabank. This analysis strengthened the connection between our materiality topics and the Bank's business model, financial resilience, risk profile, and long-term value creation capacity.

To incorporate management perspectives into the process, we obtained input from members of the Board of Directors and Odeabank's senior management. Their assessments played an important role in validating our materiality topics and ensuring alignment with the Bank's strategic priorities.

As a result of this comprehensive assessment, our materiality topics were determined by considering impact analysis, external trends, Stakeholder Opinions, financial materiality, and management views in an integrated manner.

IMPACT, RISK, AND OPPORTUNITY PERSPECTIVE

Within our double materiality framework, each topic is evaluated not merely as a sustainability issue, but as an impact, risk, and opportunity area that is directly linked to Odeabank's long-term value creation capacity.

Perspective	Assessment Question	What It Means for Odeabank
Impact	How do Odeabank's operations, products, services, financing operations, or value chain create impacts on the environment, society, employees, customers, or other stakeholders through this topic?	Enables us to better understand, manage, and make the Bank's environmental and social impacts more transparent.
Risk	How could this topic affect Odeabank's financial performance, reputation, operational continuity, portfolio quality, regulatory compliance, or overall risk profile?	Enables us to assess the implications of sustainability matters for our financial and operational resilience.
Opportunity	Does this topic present opportunities for Odeabank in terms of new products, services, financing solutions, operational efficiency, customer experience, funding, market positioning, or societal value creation?	Enables us to link our materiality topics with strategic growth opportunities and long-term value creation potential.

This approach ensures that our materiality topics are treated not merely as areas for reporting past performance, but as management priorities that support forward-looking strategic decision-making.

VALUE CHAIN PERSPECTIVE

In the banking sector, sustainability impacts extend well beyond an institution's own operations. Financing operations, customer relationships, products and services, supply chains, and business partnerships all play a significant role in creating environmental and social impacts.

Accordingly, our materiality assessment considers impacts across three key stages of the value chain:

UPSTREAM VALUE CHAIN	OWN OPERATIONS	DOWNSTREAM VALUE CHAIN
Scope of Impact Suppliers, service providers, outsourced services, procurement processes, and business partners	**Scope of Impact** Head Office, branches, digital infrastructure, information systems, employees, governance structure, and operational processes	**Scope of Impact** Customers, loan portfolio, financing operations, products and services, digital channels, customer experience, financial literacy, and community impact
Key Topics Assessed Value chain management; Supplier Code of Conduct; ethics and compliance; environmental and social criteria; human rights and labour practices; local supplier approach	**Key Topics Assessed** Corporate governance; ethics and compliance; risk management; employee experience; diversity, equity and inclusion; employee health and well-being; cybersecurity and data security; energy, emissions, water, and waste management	**Key Topics Assessed** Financing the low-carbon economy; responsible products and services; environmental and social risk management; climate-related risks; financial inclusion; financial and digital literacy; customer experience; community investment programs

This approach enables a more holistic assessment of key topics such as environmental and social risk management, financing the transition to a low-carbon economy, customer experience, data security, value chain management, and community impact.

ASSESSMENT CRITERIA AND TIME HORIZONS

Under our materiality assessment framework, each topic is evaluated from both an impact materiality and a financial materiality perspective using defined assessment criteria.

The impacts, risks, and opportunities associated with our materiality topics may emerge over different time horizons. Accordingly, our assessments consider short-, medium-, and long-term implications.

IMPACT MATERIALITY CRITERIA

NATURE OF THE IMPACT

The topic's potential to generate positive or negative impacts.

SCOPE OF THE IMPACT

The extent to which the impact affects employees, customers, society, the environment, suppliers, or financed operations.

SEVERITY OF THE IMPACT

The magnitude, duration, and significance of the impact on stakeholders.

LIKELIHOOD OF OCCURRENCE

The probability that the potential impact will materialize.

MANAGEABILITY

The extent to which the impact can be managed through existing policies, processes, controls, and mitigation actions.

FINANCIAL MATERIALITY CRITERIA

FINANCIAL PERFORMANCE IMPACT

The impact of the topic on revenue, costs, profitability, capital utilization, or financial resilience.

RISK PROFILE IMPACT

The relationship of the topic to credit risk, operational risk, market risk, compliance risk, reputational risk, or climate-related risks.

FUNDING AND CAPITAL IMPACT

The impact of the topic on funding sources, investor expectations, capital structure, or sustainable finance capacity.

PORTFOLIO IMPACT

The impact of the topic on loan portfolio quality, sector allocation, environmental and social risks, or transition risk.

STRATEGIC OPPORTUNITY IMPACT

The potential of the topic to create opportunities for new products, services, markets, customer segments, digital solutions, or societal value creation.

TIME HORIZONS OF IMPACTS

Short Term

Impacts on current operations, existing regulatory expectations, current stakeholder expectations, and reporting period performance.

Medium Term

Impacts on strategic planning, product and service development, portfolio transformation, data infrastructure, sustainable finance, and operational resilience.

Long Term

Impacts on the climate transition, financing portfolio transformation, technological transformation, human capital, societal impact, reputation, and long-term value creation capacity.

MATERIALITY TOPICS MATRIX AND STRATEGIC THEME ALIGNMENT

The outcomes of the double materiality assessment are summarised in a materiality matrix that positions our material topics across the impact materiality and financial materiality dimensions.

Through this approach, we consider our material topics not merely as a list of priorities, but as fundamental components of our strategic framework, performance indicators and long-term value creation model.

Our materiality topics are classified into three priority levels based on their significance:

Priority Level	Description
Very High Materiality topics	Topics with significant impacts on both stakeholders and the external environment, as well as substantial financial and strategic implications for Odeabank. These topics are closely monitored through our strategy, risk management, performance management, and reporting processes.
High Materiality topics	Topics that are highly significant to Odeabank's sustainability performance, stakeholder relationships, operational resilience, or value creation capacity.
Materiality Topics	Topics that should be monitored and managed as part of our sustainability approach and that complement our strategic agenda.

In alignment with the structure of this report, our materiality topics are organized under three strategic themes.

Strategic Theme	Materiality Topics
Financial Empowerment	Digital transformation; customer experience; cybersecurity and data security; financial and digital literacy; financial inclusion; fintech and innovation; prevention of financial crime
Responsible Transformation Finance	Financing the low-carbon economy; responsible products and services; environmental impact; renewable energy; circular economy; climate-related risks; environmental and social risk management
Human-Centered Banking	Diversity, equity and inclusion; talent management; employee health, well-being and safety; employee experience; community investment programs; business ethics, compliance and anti-corruption; corporate governance

The matrix visually highlights the topics that are of greater significance from the perspectives of Odea Bank's impacts on the external environment and the financial impacts on the Bank.

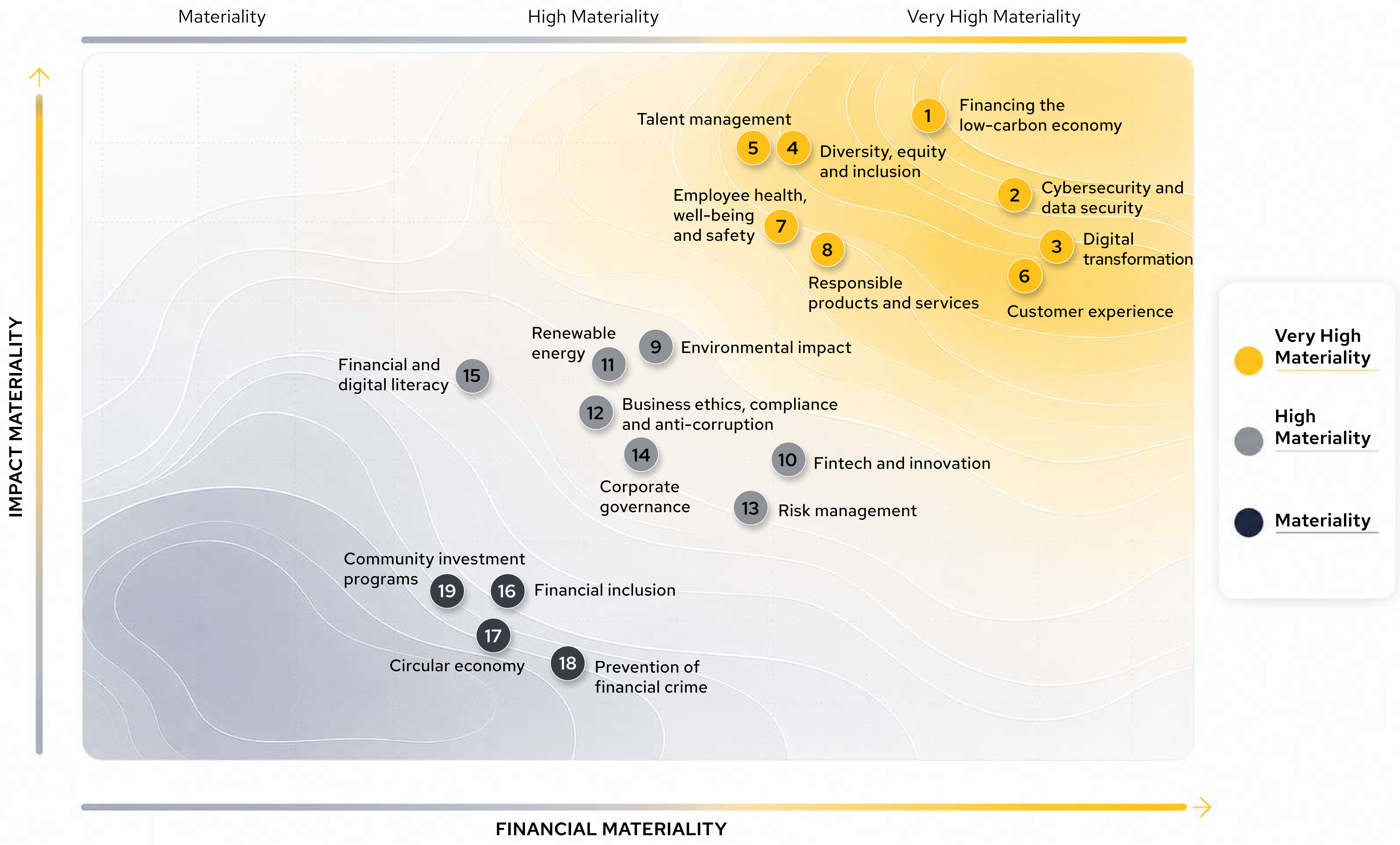
GUIDE TO READING THE MATERIALITY MATRIX

High Impact Materiality
The topic has a significant impact on the environment, society, employees, customers, or the value chain.

High Financial Materiality
The topic has a significant impact on the Bank's financial performance, risk profile, operational resilience, or long-term value creation.

High Impact + High Financial Materiality
The topic is treated as a strategic priority and is monitored closely through dedicated performance indicators.

Dynamic Topics
Topics whose significance may increase over time due to regulatory developments, market dynamics, or evolving stakeholder expectations.



LINKING MATERIALITY ASSESSMENT OUTCOMES TO STRATEGY, KPIs, AND PERFORMANCE

One of the most significant outcomes of our double materiality assessment is the integration of our materiality topics into strategic decision-making and performance management.

Area of Integration	Application of Materiality Assessment Outcomes
Strategy	Materiality topics are positioned under the three strategic pillars of our sustainability strategy.
Risk and Opportunity Management	The impacts of materiality topics on our business model, financial resilience, reputation, regulatory compliance, and operational continuity serve as key inputs to our risk and opportunity assessments.
Value Creation Model	Materiality topics are linked to both financial and non-financial capitals and integrated into our value creation approach.
KPI Framework	Materiality topics are mapped to our KPIs.
Performance and Progress	Progress in managing our materiality topics is evaluated through performance indicators and identified areas for improvement.
Reporting Structure	The report is structured to reflect the relationship between our materiality topics and strategic focus areas.

The management of our materiality topics is supported by dedicated policies, committees, processes, responsible departments, and performance indicators. Throughout the following sections of this report, the management approach and practices related to each materiality topic are presented under the relevant strategic pillar.

The sections entitled *"KPI Mapping for Materiality Topics"* and *"Performance and Areas for Progress"* further illustrate how these materiality topics are linked to the KPIs used to monitor our progress.

OUR DYNAMIC REVIEW APPROACH

We are committed to regularly reviewing our materiality assessment framework in response to evolving regulatory expectations, stakeholder needs, developments in sustainable finance, climate-related risks, digital transformation, and changing societal expectations.

Going forward, we will focus on strengthening the linkage between our materiality topics and performance indicators, enhancing data ownership, and establishing a more transparent connection between materiality topics and senior management objectives.

This approach will enhance the measurability of our sustainability strategy while enabling us to provide stakeholders with reporting that is more transparent, comparable, and better integrated with our decision-making processes.

We monitor our material topics in alignment with our strategic focus areas, risk and opportunity assessments, value creation model, and performance indicators.

RISKS, OPPORTUNITIES AND RESILIENCE

At Odeabank, we consider risk management to be one of the fundamental pillars of sustainable growth, financial resilience, stakeholder trust and long-term value creation.

At Odeabank, we consider risk management to be one of the fundamental pillars of sustainable growth, financial resilience, stakeholder trust and long-term value creation. In line with our strategy, we monitor the risks and opportunities that may affect our ability to achieve our short-, medium- and long-term objectives, and shape our actions and areas for improvement accordingly.

Rather than repeating the technical details of general banking risks, this section focuses on how our risk management framework is connected to our sustainability strategy, our TSRS 2025 climate-related risk and opportunity assessment, our approach to managing environmental and social risks arising from lending operations, and our value creation model.

Detailed information on general banking risks can be found in the *Odeabank 2025 Annual Report*, while technical disclosures on climate-related financial risks and opportunities are available in our *TSRS Compliant Sustainability Report.*

OUR RISK MANAGEMENT FRAMEWORK

At Odeabank, risk management is conducted under the oversight of the Board of Directors and the guidance of the Risk Committee. The Risk Committee is responsible for effectively identifying, monitoring and managing the risks faced by the Bank.

Our risk management framework is shaped by the Bank's risk appetite, strategic objectives, regulatory requirements, capital adequacy, liquidity structure, operational resilience and sustainability priorities. Operating under the Board of Directors, the Risk Committee regularly evaluates matters such as risk appetite, risk limits, capital adequacy, stress testing and risk-based performance, and reports its assessments to senior management.

Risk management operations at the Bank are conducted in accordance with the framework established by the Risk Management Department, which has been in place since 2012. This framework defines the responsibilities, scope, principles, governance framework, processes and roles of the risk management function.

In line with our strategy, we monitor the risks and opportunities that may affect our ability to achieve our short-, medium- and long-term objectives, and shape our actions and areas for improvement accordingly.

Our risk management approach is based on the following key principles:

Risk Management Principle	Description
Decision-making support	The risk function serves not only as a control mechanism but also as a management tool that supports business lines and decision-makers in strategic decision-making processes.
Triple layered defense	Business units and senior management constitute the first line of defense; the Risk Management and Internal Control, and Regulations and Compliance teams form the second line; while the Board of Inspectors and independent audit constitute the third line.
Independent assessment approach	The risk function supports decision-making processes through independent risk assessments and appropriate reporting mechanisms.
Transparent and systematic communication	Risks are identified, monitored and communicated to relevant stakeholders in a transparent, systematic, structured and timely manner.
Risk appetite and limit structure	Risk limits are established in line with the risk appetite approved by the Board of Directors and are monitored regularly.
Regular reporting	The Risk Management Department monitors risk appetite within the established limits and provides regular reporting to senior management and the Board of Directors.

This framework supports the integration of sustainability-related risks not only into reporting, but also into governance, strategy, lending processes, performance monitoring and decision-making mechanisms.

TSRS 2025 CLIMATE-RELATED RISK AND OPPORTUNITY ASSESSMENT

In 2025, we established our primary framework for assessing climate-related risks and opportunities through our TSRS Compliant sustainability disclosures. Our TSRS report addresses climate-related risks and opportunities under the four pillars of Governance, Strategy, Risk Management, and Metrics and Targets.

Rather than repeating the technical disclosures included in the TSRS report, this Sustainability Report focuses on how climate-related risks and opportunities are connected to our sustainability strategy, responsible finance approach, environmental and social risk management practices, and long-term value creation model.

Risk Type	Assessment Area for Odeabank	Strategic Linkage
Physical Risks	Potential impacts of climate events such as extreme weather, rising temperatures, floods and water stress on our operations, customers and financed operations	Operational resilience, impacts on the loan portfolio, climate vulnerability of customer sectors and long-term financial resilience
Transition Risks	Potential impacts arising from changes in policies, regulations, technology, markets and customer expectations during the transition to a low-carbon economy	Sustainable finance, portfolio transition, customer transition needs, environmental and social risk management, and new financing opportunities

Climate-related opportunities primarily arise from financing the transition to a low-carbon economy, renewable energy, energy efficiency, sustainable products and services, and financing solutions that support our customers' transition needs.

Further details regarding the governance, strategy, risk management, metrics and targets related to climate-related risks and opportunities are available in our *TSRS Compliant Sustainability Report.*

FROM RISKS TO OPPORTUNITIES: LINKING SUSTAINABILITY STRATEGY

Climate-related risks and opportunities addressed within the scope of TSRS 2025 represent key inputs to our sustainability strategy and responsible finance approach. We assess these risks and opportunities not only from the perspective of mitigating adverse impacts, but also as opportunities to support our customers' transition, strengthen financial resilience and enhance our long-term value creation capacity.

Focus Area	Risk Perspective	Opportunity Perspective	Report Reference
Climate-related physical risks	Climate-related physical impacts may affect our operations, customers and financed operations.	Strengthening operational resilience, improving understanding of the climate vulnerability of customer sectors, and enhancing risk assessment capabilities.	*TSRS Compliant Sustainability Report; Climate-focused Transition Approach*
Climate-related transition risks	Changes in policies, regulations, technology, markets and customer expectations may affect the loan portfolio, customer relationships and financing needs.	Sustainable finance, green loans, energy efficiency, renewable energy, and financing solutions that support customers' transition needs.	*TSRS Compliant Sustainability Report; Financing the Transition to a Low-Carbon Economy*
Environmental and social risks arising from lending operations	Financed operations may give rise to environmental and social impacts, high-risk sectors, prohibited operations, as well as reputational and compliance risks.	Strengthening the ESRM System, promoting a responsible finance culture, supporting customers' sustainable transition and enhancing portfolio resilience.	*Environmental and Social Risk Management in Lending Operations / ESRM System; Responsible Products and Services*

This framework illustrates the complementary relationship between the climate-related risk and opportunity assessment conducted under TSRS 2025 and our ESRM system. While the technical assessment of climate-related risks and opportunities is presented in detail in our TSRS Compliant Sustainability Report, our ESRM system serves as the operational framework for identifying, assessing and managing environmental and social risks throughout our lending processes.

ENVIRONMENTAL AND SOCIAL RISK MANAGEMENT IN LENDING OPERATIONS / ESRM SYSTEM

As a financial institution, we recognize that our sustainability impacts extend beyond our own operations to include our financing operations, lending portfolio, customer relationships and value chain. Accordingly, we consider environmental and social risk management to be a core component of our responsible banking and sustainable finance approach.

At Odeabank, we place significant emphasis on the effective assessment of environmental and social risks throughout our credit evaluation processes. We support the identification, mitigation, management and ongoing monitoring of the environmental and social impacts associated with the projects and operations we finance. This approach enables us not only to manage indirect risks arising from our financing operations but also to strengthen our customers' capacity to transition towards more sustainable business models.

Since 2013, environmental and social risk assessments have been embedded within our lending processes. In accordance with our *Environmental and Social Policy and List of Prohibited Activities* we assess operations that present elevated

We consider environmental and social risk management to be a core component of our responsible banking and sustainable finance approach.

environmental and social risks and refrain from providing financing to operations that do not meet our risk acceptance criteria. Since 2016, all corporate, commercial and SME lending transactions have been subject to environmental and social risk assessment, regardless of loan size.

Our Environmental and Social Risk Assessment Procedure is aligned with the standards and requirements of the IFC and the EBRD. Under this framework, projects are classified according to their environmental and social risk profile as Category A, Category B or Category C, consistent with the EBRD categorization methodology.

Risk Category	Description	Assessment Approach
Category A	Projects with significant environmental and social risks	Subject to comprehensive environmental and social due diligence, which may include independent expert assessment and the development of an Environmental and Social Action Plan (ESAP), where appropriate.
Category B	Projects with moderate environmental and social risks	Environmental and social impacts are assessed on a project-specific basis, and mitigation measures are identified where necessary.
Category C	Projects with low environmental and social risks	Projects expected to have minimal environmental and social impacts are subject to standard review and control procedures.

Where deemed necessary, we commission independent Environmental and Social Due Diligence (ESDD) assessments and require the development of environmental and social action plans to address identified risks. We also monitor the environmental and social performance of financed projects on an ongoing basis to assess compliance with applicable sustainability requirements.

Our ESRM system serves as a complementary mechanism supporting the financing of the transition to a low-carbon economy, the delivery of responsible products and services, the assessment of climate-related risks and the transformation of our lending portfolio. Considered alongside the climate-related risk and opportunity assessments conducted under TSRS 2025, our ESRM system enhances the integration of environmental and social considerations into lending decisions while supporting our customers throughout their sustainability transition.

Exclusion List

At Odeabank, all lending activities are assessed in accordance with our Environmental and Social Policy. *Our Exclusion List*, developed with reference to the IFC Exclusion List, prohibits the financing of activities involving human rights violations, child labour, forced labour, the manufacture or trade of weapons and ammunition, waste streams and hazardous waste specified under applicable legislation, as well as products and activities associated with significant biodiversity risks.

Guided by these principles, we prioritize the implementation of responsible and sustainable financing practices across all our financing activities.

FROM RISK MANAGEMENT TO VALUE CREATION

Our risk management and environmental and social risk assessment approach is designed not only to mitigate risks but also to support our customers' transition, strengthen the resilience of our lending portfolio and enhance our sustainable finance capabilities.

Strategic Theme	Risk and Opportunity Linkage
Financial Empowerment	Supports a secure, accessible and resilient banking experience through digitalization, data security, customer experience, financial inclusion and operational resilience.
Responsible Transition Finance	Directly linked to climate-related risks, environmental and social risk management, the transition to a low-carbon economy and sustainable finance opportunities.
Human-Centered Banking	Strengthens organizational resilience and stakeholder trust through employee capabilities, an ethical culture, diversity and inclusion, and positive social impact.

OUR PRIORITIES GOING FORWARD

Looking ahead, we aim to further strengthen the integration of climate-related risk and opportunity assessments with our environmental and social risk management processes and our sustainable finance approach.

Our key priorities include enhancing the integration of climate-related risks into credit underwriting and portfolio assessment processes, advancing our environmental and social risk management practices, increasing the visibility of sustainable finance opportunities, and strengthening the linkage between risk and opportunity management and performance metrics.

In addition, in line with the principles of TSRS 1, we will continue to enhance our approach to systematically assessing sustainability-related risks and opportunities beyond climate, with a particular focus on their implications for our business model, strategy and long-term value creation capacity.

Our approach to risk, opportunity and resilience lies at the heart of our "Empowering and Transformative Banking" strategy and is closely aligned with our three strategic pillars; financial empowerment, responsible transition finance and human-centered banking.

EBRU VARDAR

CORPORATE GOVERNANCE AND OUR SUSTAINABILITY GOVERNANCE

We regard corporate governance as one of the fundamental pillars of our management approach, guided by the principles of fairness, transparency, accountability, and responsibility, and supporting our Bank's long-term value creation capacity.

We build our corporate governance structure on the oversight of the Board of Directors, the committee structure, the responsibilities of senior management, internal systems functions, policies and procedures, and transparent reporting mechanisms. Through this structure, we establish an integrated link between the Bank's strategic objectives, risk management approach, legal and regulatory obligations, and sustainability priorities.

We consider sustainability governance as an integral part of this corporate governance framework. We continue to strengthen governance mechanisms that ensure the effective management of climate-related risks and opportunities, environmental and social impacts, sustainable finance, ethics and compliance, human capital, data management, and performance monitoring across the Bank.

ODEABANK'S GOVERNANCE STRUCTURE

Odeabank's governance framework operates under the strategic oversight of the Board of Directors and the executive responsibility of Senior Management. The Board of Directors has ultimate responsibility for overseeing the Bank's strategic direction, risk appetite, corporate governance framework, internal systems, policy architecture and long-term value creation approach.

Senior Management is responsible for implementing the Bank's strategic objectives, ensuring effective coordination across business units, overseeing day-to-day operations and executing the strategic direction established by the Board of Directors.

Our governance structure encompasses all core banking functions, including Corporate Banking, Retail Banking, Treasury and Capital Markets, Financial Control and Strategy, Credit Allocation, Credit Monitoring and Recovery, Technology and Operations, Human Resources, Legal Affairs, Risk Management, Internal Control and Internal Systems.

As of the 2025 reporting year, through the organizational arrangements implemented, we aimed to establish a more streamlined and integrated governance structure aligned with our strategic priorities.

We believe that an effective governance framework directly strengthens strategic decision-making, risk management, an ethical business culture, stakeholder trust, and sustainable growth.

OUR CORPORATE GOVERNANCE PRINCIPLES COMPLIANCE REPORTS

We have established a structured governance framework to promote the consistent implementation and continuous enhancement of sound corporate governance practices across the Bank. Our governance approach is founded on the principles of fairness, transparency, accountability and responsibility, while ensuring balanced consideration of stakeholder interests and the transparent management of potential conflicts of interest.

Since 2017, we have published an annual "Corporate Governance Principles Compliance Report", enabling us to monitor our governance performance and disclose our practices transparently to stakeholders. In line with the regulations of the BRSA, we regularly review and update our corporate governance principles, policies and procedures.

Our *Corporate Governance Compliance Reports* are available here.

PRINCIPLE 1

Corporate values and strategic objectives should be clearly established and communicated throughout the Bank.

PRINCIPLE 2

Roles, authorities and responsibilities should be clearly defined, effectively assigned and consistently implemented across the organization.

PRINCIPLE 3

Members of the Board of Directors should possess the qualifications required to discharge their duties effectively, understand their responsibilities within the corporate governance framework, and be capable of exercising independent judgement on the Bank's operations.

PRINCIPLE 4

Senior Management should possess the competencies necessary to perform their responsibilities effectively and fully understand their role within the Bank's corporate governance framework.

PRINCIPLE 5

The Bank should ensure the effective utilization of the work performed by employees within the Internal Systems functions and by Independent Auditors.

PRINCIPLE 6

Remuneration policies should be aligned with the Bank's ethical values, strategic objectives and internal governance framework.

PRINCIPLE 7

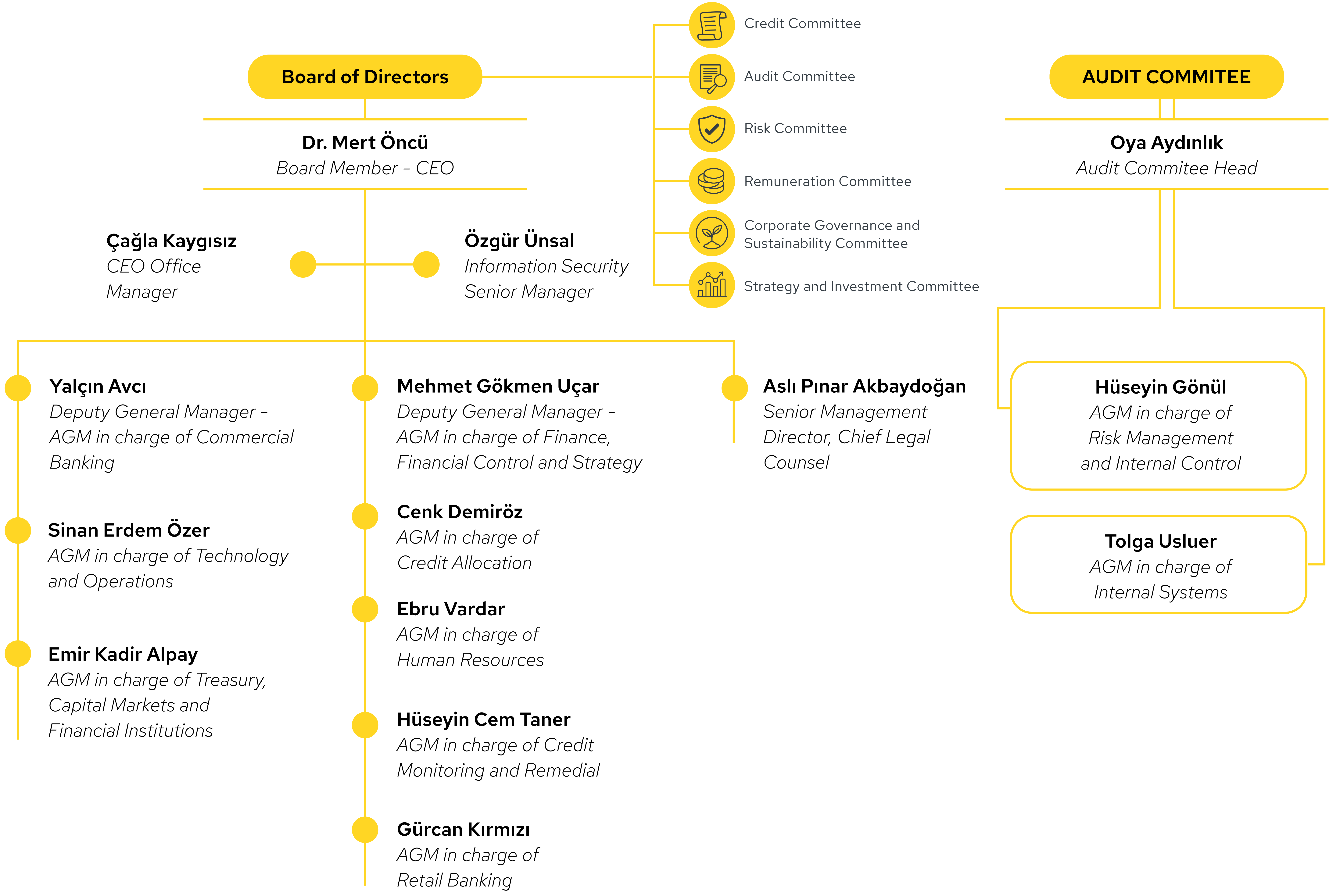
Transparency should be embedded throughout the Bank's corporate governance practices.

ORGANIZATIONAL STRUCTURE

Odeabank's organizational structure is built around the oversight of the Board of Directors, Board Committees, the Senior Management led by the Chief Executive Officer, and the internal systems functions operating under the supervision of the Audit Committee.

Our internal systems functions operate under the oversight of the Audit Committee and cover risk management, internal control, internal audit, fraud prevention, credit risk, market and liquidity risk, operational risk, and business continuity.

Detailed information on Odeabank's organizational structure for the 2025 reporting period, senior management, and external auditors is provided in the *Odeabank 2025 Annual Report.*



BOARD OF DIRECTORS COMMITTEES

The committees established under the Board of Directors are key components of Odeabank's governance framework. Within their respective areas of responsibility, these committees support the Board by contributing to policy development, monitoring implementation, overseeing risks and internal systems, supporting strategic decision-making and strengthening reporting processes.

CREDIT COMMITTEE

Primary Responsibility	Oversees credit approval processes, credit policies and the Bank's portfolio risk profile.		
Sustainability / ESG Linkage	Supports responsible finance, environmental and social risk management, and portfolio quality.		
Committee Structure			
Chair:	Dr. Mert Öncü CEO and Board Member	**Members:**	Jawad Shafique (Vice Chair of the Board), Ali Temel

AUDIT COMMITTEE

Primary Responsibility	Oversees the effectiveness of internal control, risk management, internal audit, accounting and financial reporting processes.		
Sustainability / ESG Linkage	Supports data reliability, internal systems, reporting quality, and the control environment.		
Committee Structure			
Chair:	Oya Aydınlık	**Members:**	Mohamed M. Kaissi, Hamad Saeed Ali Saeed Alshehhi

CORPORATE GOVERNANCE AND SUSTAINABILITY COMMITTEE*

Primary Responsibility	Oversees compliance with corporate governance principles and sustainability activities.		
Sustainability / ESG Linkage	Serves as the primary oversight mechanism for the Bank's sustainability strategy, ESG priorities, climate-related matters, reporting, and governance development.		
Committee Structure			
Chair:	Ali Temel	**Members:**	Mohamed M. Kaissi, Dr. Ayşe Botan Berker

RISK COMMITTEE

Primary Responsibility	Oversees the processes for identifying, measuring, monitoring, and managing the risks to which the Bank may be exposed.		
Sustainability / ESG Linkage	Related to the Bank's risk appetite, climate-related risks, environmental and social risks, and resilience approach.		
Committee Structure			
Chair:	Dr. Ayşe Botan Berker	**Members:**	Hamad Saeed Ali Saeed Alshehhi, Subramanian Suryanarayan

REMUNERATION COMMITTEE

Primary Responsibility	Oversees the alignment of remuneration policies with ethical values, strategic objectives, and internal equity.		
Sustainability / ESG Linkage	Related to responsible remuneration, ethical culture, and long-term value creation.		
Committee Structure			
Chair:	Jawad Shafique	**Members:**	Oya Aydınlık, Mohamed M. Kaissi

STRATEGY AND INVESTMENT COMMITTEE

Primary Responsibility	Reviews long-term strategic priorities, the Bank's investment perspective, and growth opportunities.		
Sustainability / ESG Linkage	Related to sustainable growth, transformation priorities, and the Bank's long-term value creation approach.		
Committee Structure			
Chair:	Jawad Shafique	**Members:**	Hamad Saeed Ali Saeed Alshehhi, Subramanian Suryanarayan, Ali Temel, Dr. Mert Öncü

** In accordance with applicable regulations, the Chair of the Committee is a non-executive member of the Board of Directors. The composition of the Corporate Governance and Sustainability Committee is presented as of 31 December 2025.*

Board Competency Matrix

MARCOS ALONSO DE QUADROS
Chair of the Board
Nationality: Brazil
Total Professional Experience: 36 years
Tenure at Odeabank: 6 years

JAWAD SHAFIQUE
Vice Chair of the Board
Nationality: Pakistan
Total Professional Experience: 22 years
Tenure at Odeabank: 4 years

MOHAMED M KAISSI
Member of the Board
Nationality: USA
Total Professional Experience: 17 years
Tenure at Odeabank: 7 years

HAMAD SAEED ALI SAEED ALSHEHHI
Member of the Board
Nationality: UEA
Total Professional Experience: 16 years
Tenure at Odeabank: 4 years

SUBRAMANIAN SURYANARAYAN
Independent Member of the Board
Nationality: Singapore
Total Professional Experience: 42 years
Tenure at Odeabank: 8 years

AYŞE BOTAN BERKER
Independent Member of the Board
Nationality: Türkiye
Total Professional Experience: 43 years
Tenure at Odeabank: 8 years

OYA AYDINLIK
Independent Member of the Board
Nationality: Türkiye
Total Professional Experience: 39 years
Tenure at Odeabank: 6 years

ALİ TEMEL
Independent Member of the Board
Nationality: Türkiye
Total Professional Experience: 36 years
Tenure at Odeabank: 6 years

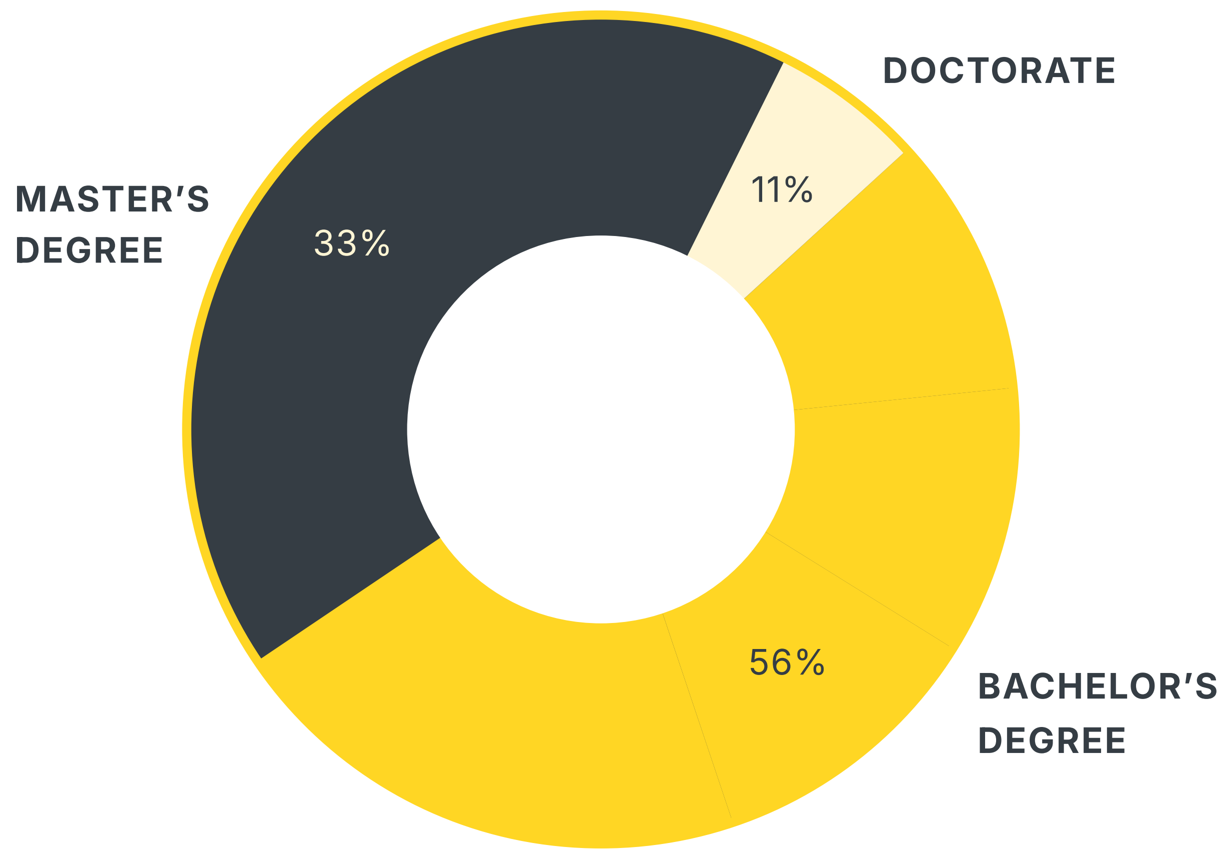
DR. MERT ÖNCÜ
Member of the Board and CEO
Nationality: Türkiye
Total Professional Experience: 32 years
Tenure at Odeabank: 6 years

The competency profile of Odea Bank's Board of Directors is evaluated in light of the Board's responsibilities for long-term value creation, effective risk management, and the oversight of sustainability- and climate-related risks and opportunities.

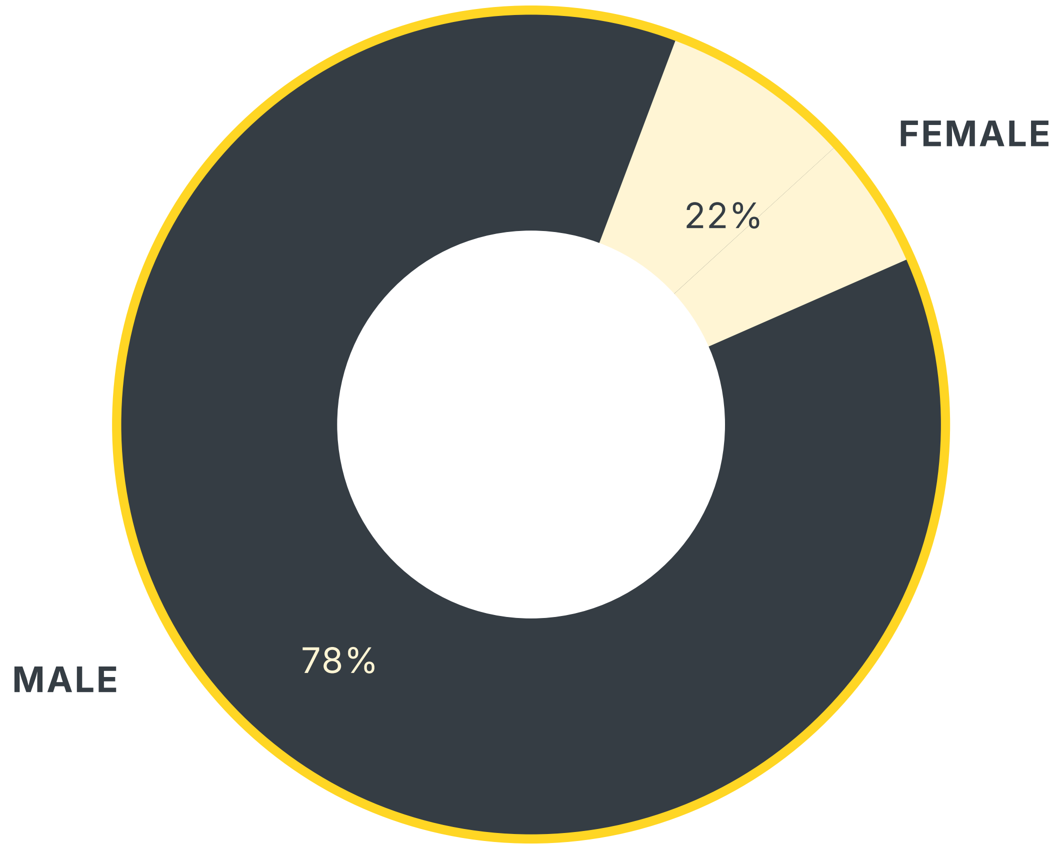
- Credit Committee
- Risk Management Committee
- Corporate Governance and Sustainability Committee
- Audit Committee
- Remuneration Committee
- Strategy and Investment Committee

Board Competency Matrix

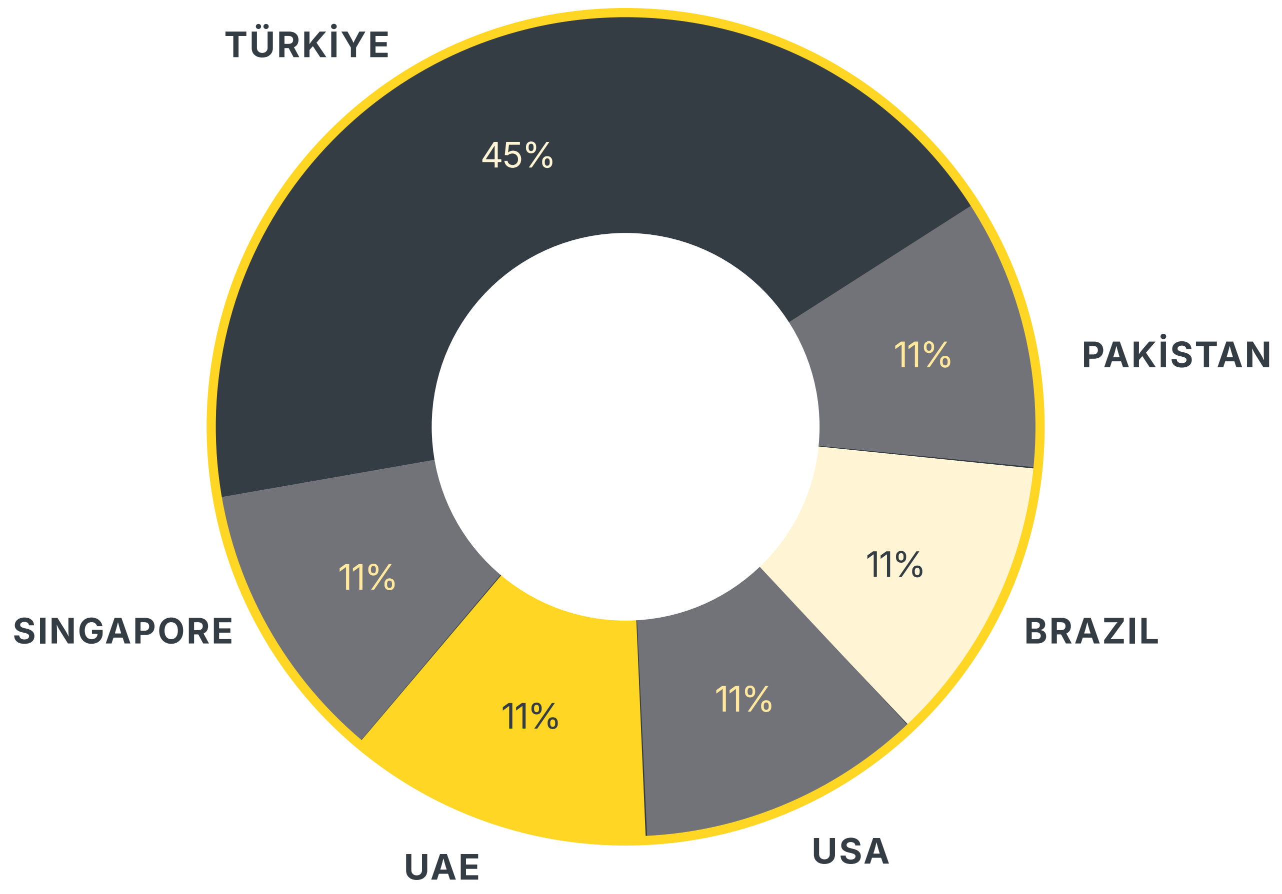
EDUCATIONAL BACKGROUND



GENDER DIVERSITY



NATIONALITY DISTRIBUTION



EXPERIENCE DISTRIBUTION (NUMBER OF MEMBERS)

Note: As each member may be represented in more than one area of experience, the sum of the figures by area may exceed the total number of members.

Senior Management Competency Matrix

DR. MERT ÖNCÜ
Board Member - CEO

Total Professional Experience: 32 years
Tenure at Odeabank: 8.5 years

YALÇIN AVCI
Deputy General Manager – AGM* in charge of Commercial Banking

Total Professional Experience: 31 years
Tenure at Odeabank: 14.5 years

MEHMET GÖKMEN UÇAR
Deputy General Manager - AGM in charge of Finance, Financial Control and Strategy

Total Professional Experience: 28 years
Tenure at Odeabank: 8 years

SİNAN ERDEM ÖZER
AGM in charge of Technology and Operations

Total Professional Experience: 32 years
Tenure at Odeabank: 8 years

HÜSEYİN GÖNÜL
AGM in charge of Risk Management and Internal Control

Total Professional Experience: 31 years
Tenure at Odeabank: 7 years

EMİR ALPAY
AGM in charge of Treasury, Capital Markets and Financial Institutions

Total Professional Experience: 27 years
Tenure at Odeabank: 7 years

CENK DEMİRÖZ
AGM in charge of Credit Allocation

Total Professional Experience: 26 years
Tenure at Odeabank: 7 years

EBRU VARDAR
AGM in charge of Human Resources

Total Professional Experience: 30 years
Tenure at Odeabank: 6 years

HÜSEYİN CEM TANER
AGM in charge of Credit Monitoring and Remedial

Total Professional Experience: 30 years
Tenure at Odeabank: 14 years

GÜRCAN KIRMIZI
AGM in charge of Retail Banking

Total Professional Experience: 24 years
Tenure at Odeabank: 4 years

TOLGA USLUER
AGM in charge of Internal Systems

Total Professional Experience: 26 years
Tenure at Odeabank: 8.5 years

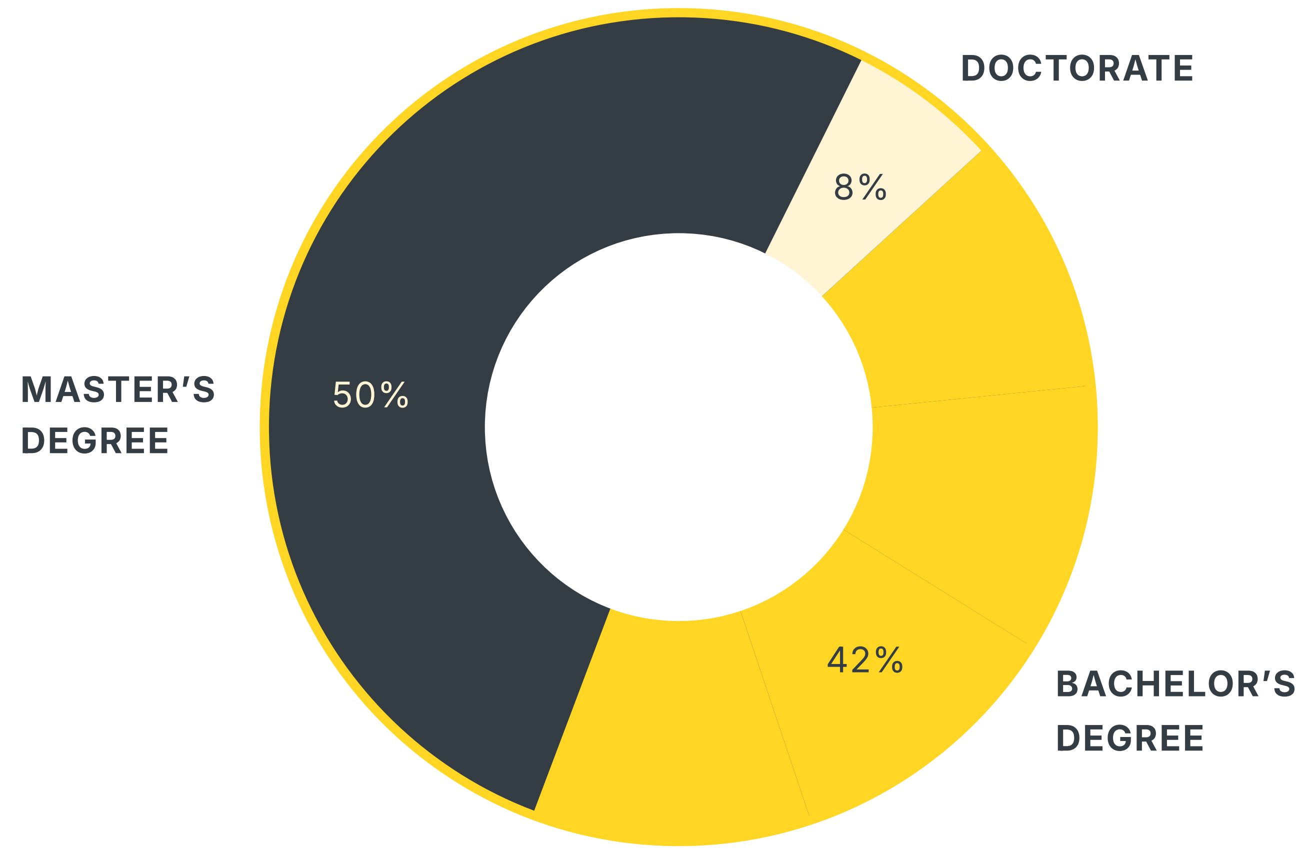
ASLI PINAR AKBAYDOĞAN
Senior Management Director, Chief Legal Counsel

Total Professional Experience: 21 years
Tenure at Odeabank: 10.5 years

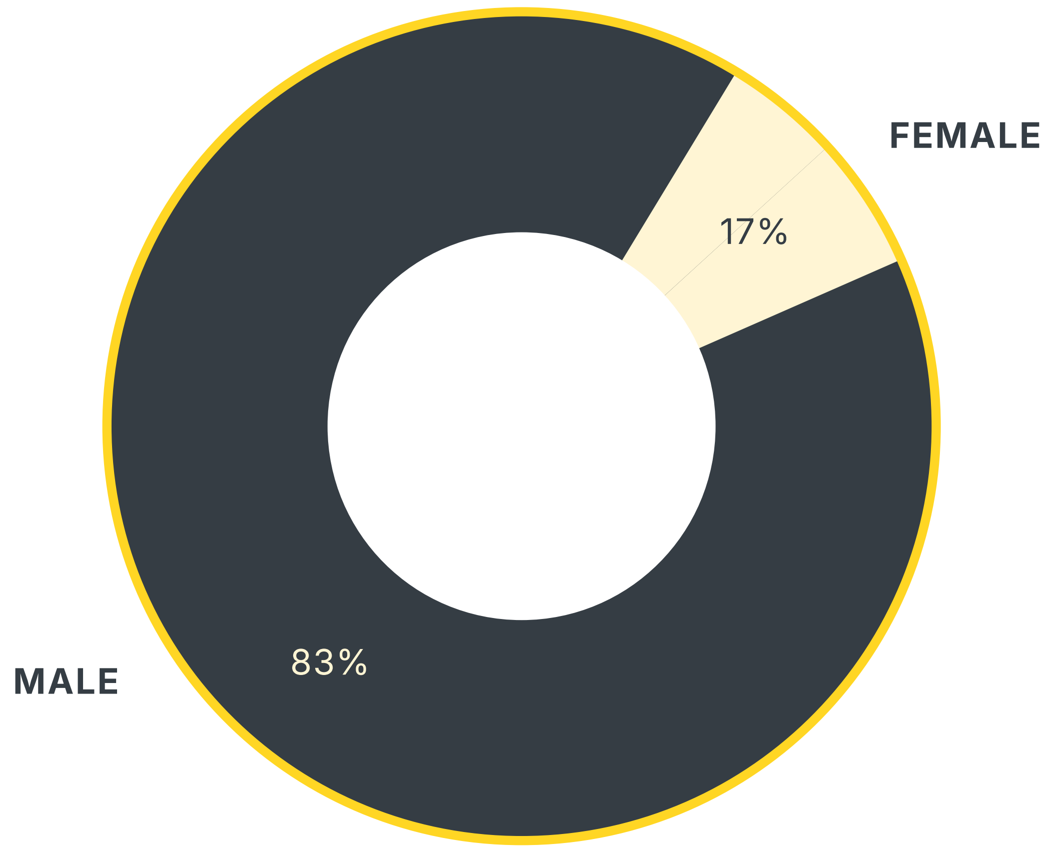
All members of Odeabank's Senior Management are citizens of the Republic of Türkiye.

Senior Management Competency Matrix

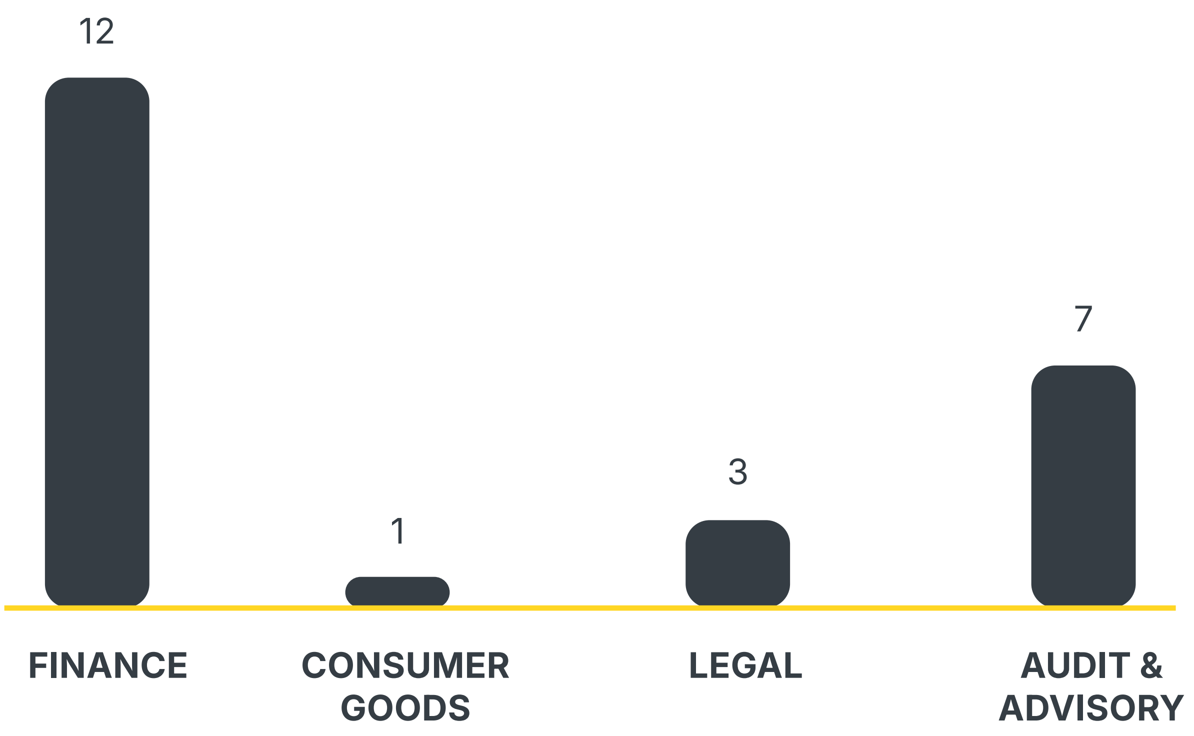
EDUCATIONAL BACKGROUND



GENDER DIVERSITY



EXPERIENCE DISTRIBUTION (NUMBER OF MEMBERS)



Note: As each member may be represented in more than one area of experience, the sum of the figures by area may exceed the total number of members.

OUR SUSTAINABILITY GOVERNANCE APPROACH

At Odeabank, we support our sustainability agenda not only through the products and services we offer, but also through our corporate governance framework, decision-making mechanisms, risk management processes, data management systems, and performance management approach.

Our Sustainability Policy sets out our core principles and commitments in key areas including climate change, environmental and social risk management, financial inclusion, ethical business conduct, and respect for human rights. Responsibility for implementing the Policy rests with the Sustainability Department, while related operations are overseen by the Corporate Governance and Sustainability Committee.

Our sustainability governance framework is built on Board oversight, Committee ownership, coordination by the Sustainability Department, cross-functional working groups, business units, and data owners. This structure promotes enterprise-wide ownership of sustainability matters and supports the effective implementation of actions related to our priority sustainability topics across relevant functions.

OUR SUSTAINABILITY GOVERNANCE STRUCTURE

CORPORATE GOVERNANCE AND SUSTAINABILITY COMMITTEE

The Corporate Governance and Sustainability Committee operates under the authority of the Board of Directors and oversees the Bank's compliance with corporate governance principles and the implementation of its sustainability agenda. The Committee monitors the execution of the Bank's sustainability strategy, evaluates key ESG priorities, develops recommendations relating to sustainability reporting, and, where appropriate, submits recommendations to the Board of Directors.

The Committee considers sustainability and climate-related matters in conjunction with the Bank's risk management framework, strategic objectives, business priorities, and reporting obligations. Where necessary, relevant business units and subject matter experts are engaged to support the decision-making process.

Area of Responsibility	Role of the Committee
Compliance with Corporate Governance Principles	Monitors the Bank's compliance with its Corporate Governance Principles and submits recommendations for improvement to the Board of Directors.
Oversight of Sustainability Operations	Regularly monitors the Bank's sustainability initiatives and evaluates their effectiveness and progress.
ESG Strategic Priorities	Reviews strategic environmental, social and governance priorities and provides recommendations.
Board Structure and Development	Oversees Board nomination processes and, where appropriate, executive and Board development initiatives.
Compliance with Legal and Regulatory Requirements	Ensures that the Board's structure, policies and processes remain aligned with applicable legal and regulatory requirements.
Ethics Reporting Channels	Supports secure reporting channels for raising concerns regarding breaches of corporate values and the Code of Ethics.
Review of the Corporate Governance Framework	Conducts an annual review of the Bank's corporate governance framework and reports its findings to the Board of Directors.

During 2025, the Committee reviewed key topics including the Bank's;

- Sustainability strategy
- Climate-related risks and opportunities
- The green transition
- The GAR
- Regulatory developments
- Sustainability projects.

3 Meetings

3 Resolutions

1 Circular Resolution

The Corporate Governance and Sustainability Committee convened on 18 February 2025, 7 May 2025, and 3 November 2025, holding three meetings and adopting a total of three resolutions during the reporting period. In addition, on 26 September 2025, the Committee adopted one resolution by written circulation without holding a physical or video conference meeting.

SUSTAINABILITY DEPARTMENT AND WORKING GROUPS

Our sustainability agenda is coordinated by the Sustainability Department, which operates under Burcu Akın Öztemel, Head of Financial Institutions, Funding and Sustainability.

The Department plays a central role in developing and implementing the Bank's sustainability strategy, coordinating sustainability reporting and data collection, monitoring regulatory developments, managing ESG ratings and sustainability indices, advancing the sustainable finance agenda, addressing stakeholder expectations, and ensuring the effective execution of sustainability-related projects.

This governance model supports the integration of sustainability into the Bank's business processes. Through dedicated working groups and sub-working groups, sustainability objectives are translated into business unit-level actions, coordination is strengthened across functions, and data flows supporting sustainability reporting are enhanced.

Roles and Responsibilities of the Sustainability Department

- Develop the Bank's sustainability strategy and roadmap in line with its vision and mission.
- Monitor national and international sustainability developments and support the development of sustainable financial products.
- Coordinate initiatives to ensure alignment with national and international sustainability standards and reporting frameworks.
- Measure greenhouse gas emissions, establish emissions reduction targets, and model the impact of climate risk scenarios on the Bank's lending portfolio.
- Maintain regular dialogue with internal and external stakeholders and conduct expectation analyses and feedback processes.
- Organize sustainability training programs and awareness sessions across the Bank.
- Monitor the sustainability of the Bank's operations and, where applicable, those of its suppliers.
- Fulfil the Bank's sustainability commitments and communicate progress transparently.
- Design and enhance a flexible and scalable organizational structure centered on sustainability principles.
- Collaborate with the Sustainability Working Group to develop and implement sustainability-linked products and services.
- Monitor the implementation of actions assigned to the Sustainability Working Group.
- Periodically report sustainability initiatives and internal developments to the Corporate Governance and Sustainability Committee.

WORKING GROUP STRUCTURE AND COORDINATION

SUSTAINABILITY DEPARTMENT	WORKING GROUP	SUB-WORKING GROUPS	BUSINESS UNITS / DATA OWNERS
The central function responsible for strategy, guidance and coordination.	Translates sustainability objectives into actions in collaboration with business units.	Conduct detailed work on specific topics through specialised teams.	Ensure data flow, implement actions and contribute to performance.

OUR ETHICS AND COMPLIANCE APPROACH

At Odea Bank, we foster a transparent, trustworthy, and responsible workplace culture grounded in our corporate values and ethical principles

At Odeabank, we regard an ethical business culture as one of the cornerstones of our trust-based banking approach, corporate reputation, and long-term relationships with our stakeholders. In conducting our business, we are committed not only to compliance with applicable laws and regulations but also to the principles of integrity, honesty, reliability, transparency, respect, fair competition, prevention of conflicts of interest, and accountability.

Our ethics and compliance framework is supported by policies and procedures that enable our employees to fulfill their professional and personal responsibilities in line with the highest ethical standards, as well as training and awareness programs, internal reporting mechanisms, confidentiality and non-retaliation principles, disciplinary processes, and ethical expectations applicable to third parties.

This approach enables the Bank not only to meet its compliance obligations but also to safeguard the integrity of the financial system, strengthen customer trust, provide a safe working environment for employees, and promote responsible business conduct throughout our value chain.

OUR ETHICAL CULTURE AND CODE OF CONDUCT

Our Code of Ethics and Conduct Policy establishes the fundamental principles governing the personal and professional responsibilities of our employees toward the Bank and its stakeholders. The Policy sets out the ethical principles, professional standards, rules of conduct, confidentiality requirements, fair competition principles, conflict of interest management, and measures for protecting the Bank’s reputation that employees are expected to observe while performing their duties.

At Odeabank, our ethical culture extends beyond compliance with policies and procedures. We expect our employees to demonstrate integrity, honesty, reliability, transparency, and respect in their decision-making processes and to conduct their relationships with customers, colleagues, suppliers, and all stakeholders in a professional and fair manner.

Accordingly, we maintain a zero-tolerance approach to violence, harassment, discrimination, intimidation, and all forms of inappropriate conduct. To reinforce ethical values as an integral part of our corporate culture, we regularly organize training and awareness activities for our employees.

Our Code of Ethics and Conduct Policy is available here.

ETHICS AND COMPLIANCE GOVERNANCE FRAMEWORK

We manage ethics and compliance through a governance framework that is preventive, transparent, traceable, and continuously improved. Our primary objective is to prevent unethical conduct before it occurs, provide employees with trusted reporting channels, ensure that reports are handled confidentially, and implement disciplinary and corrective actions where necessary.

Ethical business culture
We encourage employees to make decisions based on integrity, honesty, reliability, transparency, respect, and accountability.

Regulatory compliance
We conduct our operations in accordance with applicable laws and regulations, Bank policies and procedures, and industry standards.

Fair competition
We uphold the principles of fair competition and ethical business practices across all our operations.

Conflict of interest management
We require employees and relevant parties to identify and manage potential conflicts of interest in accordance with our policies and procedures.

Reporting mechanisms
We maintain our Internal Whistleblowing Line to enable the secure reporting of ethical violations, regulatory breaches, or inappropriate conduct.

Confidentiality and non-retaliation
We protect the confidentiality of whistleblowers' identities and prohibit retaliation, discrimination, or punitive action against individuals who report concerns in good faith.

Anti-bribery and anti-corruption
We maintain a zero-tolerance approach to bribery, corruption, improper benefits, inappropriate gifts or hospitality, and facilitation payments.

Supplier and third-party compliance
We expect our suppliers and business partners to operate in line with our standards regarding ethics, regulatory compliance, fair competition, human rights, labour practices, occupational health and safety, and environmental responsibility.

INTERNAL WHISTLEBLOWING LINE AND SECURE REPORTING MECHANISM

We operate an Internal Whistleblowing Line to enable all employees to report potential breaches of our Code of Ethics, regulatory violations, or inappropriate conduct in a secure manner. The reporting procedures, communication channels, and responsible functions are clearly communicated and readily accessible across the Bank.

Whistleblowing reports are managed under the coordination of the Board of Inspectors. The identity of whistleblowers is kept strictly confidential, and employees are protected against retaliation, discrimination, or any form of adverse treatment. This framework provides a safe environment in which employees can report ethical concerns without fear.

No reports were submitted through the whistleblowing line in 2025. To reinforce awareness, 84% of employees completed ethics training and the channel is communicated via trainings and intranet. Zero-incident figures are internal-record-based and unassured.

Where an employee is aware of a breach of the Code of Ethics and Business Conduct but fails to report it, the Bank reserves the right to initiate disciplinary proceedings. Such cases are reviewed by the Disciplinary Committee in accordance with the relevant policies and procedures.

ANTI-BRIBERY AND ANTI-CORRUPTION

At Odeabank, we conduct all our operations in accordance with the principles of integrity, transparency, accountability, and ethical business conduct, while maintaining a zero-tolerance approach to bribery and corruption. We consider adherence to these principles a fundamental responsibility for all our stakeholders, including our Board of Directors, employees, suppliers, and business partners.

Under our Anti-Bribery and Corruption Policy, control mechanisms have been established to prevent bribery, corruption, improper benefits, inappropriate gifts and hospitality, and any conduct that may give rise to conflicts of interest. The Policy applies to employees, managers, suppliers, consultants, and all third parties acting on behalf of the Bank, with the objective of ensuring that business relationships are conducted in accordance with ethical principles.

Accordingly, gifts and hospitality, donations and sponsorships, facilitation payments, third-party relationships, and situations that may create conflicts of interest are assessed within established principles and approval thresholds.

Our ethics and compliance framework is governed under the oversight of the Board of Directors, with ownership by senior management and coordination among the relevant control functions. The Regulatory Compliance, Risk Management, and Internal Control functions, together with other relevant units, contribute to the monitoring, evaluation, and continuous improvement of related policies and practices.

For the 2025 reporting period, no reports of corruption or bribery were received, and the number of confirmed corruption and bribery incidents was zero.

Our *Anti-Bribery and Corruption Policy* is available here.

ETHICS AND COMPLIANCE TRAINING

We regularly conduct training and awareness programs to strengthen our culture of ethics and compliance across the Bank. Training topics include ethical business conduct, workplace principles, conflict of interest management, fraud and corruption risks, anti-money laundering and counter-terrorist financing, and regulatory compliance.

The key ethics and compliance training programmes delivered in 2025 are outlined below:

Training	Employees	Managers	Hours
Code of Ethics and Business Conduct Training	1,535		768
Anti-Money Laundering and Counter-Terrorist Financing Training	1,585	292	1,796
Anti-Bribery and Corruption Training	1,394	271	697

Through these training sessions delivered in 2025, we aim to strengthen our employees' awareness of ethical decision-making, regulatory compliance, financial crime prevention, conflict of interest management, and bribery and corruption risks.

Extending Our Ethics and Compliance Standards to Suppliers and Third Parties

We view ethics and compliance as extending beyond our internal operations and expect the same standards to be upheld by our suppliers and business partners. Our Supplier Code of Conduct Policy applies to all suppliers providing goods, services, or materials to Odeabank, as well as their employees, managers, representatives, agents, and subcontractors.

Under the Policy, suppliers are expected to comply with all applicable laws, regulations, and industry standards, particularly those relating to labour rights, occupational health and safety, environmental protection, and fair competition. As part of our anti-bribery, anti-corruption, and anti-fraud approach, suppliers are prohibited from offering or accepting bribes, improper benefits, facilitation payments, or inappropriate gifts and hospitality that could influence business relationships, whether directly or indirectly.

This approach supports the extension of our ethics and compliance culture throughout our value chain.

No reports of corruption or bribery were received in 2025. Number of confirmed corruption and bribery cases: 0.

CREATING VALUE WITH OUR STAKEHOLDERS

We maintain regular and needs-based engagement with each stakeholder through a wide range of direct and indirect communication channels.

At Odeabank, we build our sustainable value creation approach on open, regular, and transparent engagement with our stakeholders. We define our stakeholders as the broad ecosystem of individuals, institutions, and communities that are affected by our operations, influence our operations, or contribute to our value creation process.

We incorporate stakeholder feedback into the assessment of our materiality topics, the enhancement of our products and services, the improvement of employee and customer experience, the management of environmental and social risks, the advancement of sustainable finance practices, and the design of our social impact initiatives.

We also consider stakeholder expectations and feedback to be an integral part of our reporting process. Accordingly, Stakeholder Opinions are reflected throughout this report, while the value we create through our memberships, industry contributions, and collaborations is presented in detail under the *"Memberships and Collaborations"* section.

FROM FEEDBACK TO ACTION

We view stakeholder engagement as more than a communication and information-sharing exercise. We consider stakeholder expectations, recommendations, and feedback as valuable inputs that support our decision-making processes. Our approach consists of four key stages:

Listening and Understanding: We gather insights into stakeholder expectations, needs, and priorities through various communication channels, meetings, surveys, collaborative platforms, reporting processes, and partnerships.

Prioritization: Feedback received is assessed in line with the Bank's strategic priorities, sustainability approach, key risks and opportunities, and long-term value creation model.

Turning Insights into Action: Stakeholder expectations are integrated into product and service development, customer and employee experience, sustainable finance, environmental and social risk management, compliance, social investment, and value chain management processes.

Reporting and Monitoring: We disclose how stakeholder feedback has been addressed throughout this report and monitor our progress through performance indicators, case studies, and collaborative initiatives.

We maintain regular and needs-based engagement with each stakeholder through a wide range of direct and indirect communication channels.

STAKEHOLDER GROUP*	KEY EXPECTATIONS / MATERIAL TOPIC	ENGAGEMENT CHANNELS	KEY TOPICS	HOW FEEDBACK IS INTEGRATED INTO BUSINESS PROCESSES
Employees	Engagement, professional development, employee commitment, and an inclusive and safe workplace	Employee engagement surveys; training programs; meetings; internal communication channels; corporate publications; digital platforms	Employee experience; learning and development; corporate culture; diversity and inclusion; sustainability awareness	Employee feedback is incorporated into the enhancement of internal communications, training programs, talent management, and employee experience initiatives.
Shareholders	Long-term value creation, financial resilience, transparency, and effective governance	Investor meetings; annual reports; sustainability reports; committee and Board briefings; website announcements	Financial performance; strategic priorities; corporate governance; sustainability performance; risk management	Shareholder expectations are considered in strategic planning, performance management, corporate governance, and sustainability decision-making processes.
Customers	High-quality, accessible, secure, and innovative banking services	Customer satisfaction surveys; complaint and request channels; customer visits; digital channels; customer touchpoints; events	Customer experience; digital banking; data security; access to finance; sustainable finance solutions	Customer feedback informs product and service development, digital channel enhancements, customer experience initiatives, and sustainable finance solutions.
Public Authorities and Regulatory Bodies	Regulatory compliance, transparent reporting, effective risk management, and industry contribution	Periodic reporting; official correspondence; supervisory reviews; meetings; conferences; industry working groups	Regulatory compliance; sustainability reporting; climate and environmental risks; financial regulations; corporate governance	Regulatory expectations are a key input for strengthening compliance, reporting, risk management, internal control, and sustainability governance practices.
International Financial Institutions	Sustainable finance, environmental and social risk management, and alignment with international standards	Reporting; technical assistance programs; project meetings; performance reviews; joint initiatives; funding programs	Environmental and social risk management; sustainable finance; capacity building; international best practices	Collaboration with international financial institutions supports the enhancement of environmental and social risk management in lending processes, strengthens technical capacity, and advances sustainable finance practices.
Suppliers	Ethical, reliable, high-quality, and sustainable business relationships	Supplier assessments; contracts; meetings; email and telephone communications; performance feedback	Responsible procurement; ethics and compliance; service quality; operational continuity; sustainability criteria	Supplier feedback and performance assessments are used to improve procurement processes, service quality, and responsible sourcing practices.
Non-Governmental Organizations and Industry Associations	Collaborative social, environmental, and industry impact	Platform memberships; joint projects; workshops; meetings; awareness campaigns; reporting operations; events	Sustainable development; gender equality; environmental responsibility; financial literacy; sustainable finance	Partnerships with NGOs and industry associations contribute to social investment initiatives, sustainability awareness, and the adoption of industry best practices.
Local Communities	Social impact, inclusion, environmental stewardship, and educational support	Community investment projects; volunteering programs; events; campaigns; local partnerships; corporate communication channels	Education; environmental awareness; volunteering; community development; inclusion	Engagement with local communities helps prioritize and enhance community investment, volunteering, and awareness initiatives.
Universities	Knowledge sharing, talent development, and academic collaboration	Conferences and panel discussions; internship and career programs; academic partnerships; sponsorships; joint projects	Talent acquisition; financial literacy; innovation; sustainability awareness	Collaboration with universities supports graduate talent programs, employer branding, financial literacy, and sustainability awareness initiatives.
Media	Timely, accurate, and transparent public communication	Press releases; interviews; press conferences; corporate social media channels; media partnerships	Corporate developments; sustainability initiatives; community investment projects; industry contributions	Media engagement supports transparent communication, reputation management, and the public disclosure of our sustainability performance.

**Stakeholder groups have been prioritized based on their impact on the Bank's operations, the significance of their expectations, and their relevance to our value creation model.*

Financial Empowerment

DIGITALIZED AND ENHANCED CUSTOMER EXPERIENCE

We continuously enhance our digital services to make banking more accessible, intuitive, and efficient for our customers.

8 DECENT WORK AND ECONOMIC GROWTH
9 INDUSTRY, INNOVATION AND INFRASTRUCTURE
10 REDUCED INEQUALITIES
12 RESPONSIBLE CONSUMPTION AND PRODUCTION

Capitals:

- Intellectual Capital
- Manufactured Capital
- Social and Relationship Capital
- Financial Capital

Related Materiality Topics:

- Cybersecurity and Data Security
- Digital Transformation
- Customer Experience
- Responsible Products and Services
- Fintech and Innovation
- Risk Management
- Financial and Digital Literacy
- Renewable Energy
- Financial Inclusion
- Prevention of Financial Crime

At Odeabank, we regard customer experience as one of the fundamental drivers of our sustainable growth strategy and value creation model. By integrating customer feedback, data analytics, and digital insights into our decision-making processes, we continuously improve our products and services to address the evolving needs and expectations of our customers.

We regard every notification received by our Bank as a valuable source of feedback for enhancing the customer experience. Each submission is carefully assessed, and responses are provided to both customers and non-customers through their preferred communication channel. We continuously monitor our feedback management processes and use the insights gained to improve service quality and enhance our operational processes. As a member of the TBB, we participate in customer complaint reporting processes 4 times a year, contributing to sector-wide monitoring and evaluation practices.

Guided by our phygital banking vision, we seamlessly integrate physical and digital customer touchpoints to deliver an accessible, personalized, and user-friendly banking experience. By analyzing customer journeys end-to-end, we continuously enhance interactions across all touchpoints, simplify transaction processes, and improve overall service quality.

Customer Experience Tailored to Different Segments

COMMERCIAL BANKING CUSTOMERS	RETAIL BANKING CUSTOMERS
• Corporate Internet Banking infrastructure upgraded • Corporate Mobile Banking application expanded • End-to-end process management strengthened • Digital and green transformation solutions introduced • User-friendly, high-performance digital banking experience delivered • Data management and performance monitoring capabilities improved • Regular branch performance analytics provided • Digital application user experience enhanced • Project finance and syndicated lending capabilities strengthened • Structured finance solutions offered • Green Transformation Loan Programme expanded • Renewable energy and energy efficiency investments supported • Dedicated financing solutions for exporters introduced • Tailored support packages developed for women entrepreneurs	• Odea Privileges World launched • Solutions introduced to transform everyday spending into investment opportunities • Investment product offering expanded • Personalized investment experience enhanced • Customer experience enhancements implemented • Investment-focused products and services expanded • Daily banking services integrated with investment solutions • Innovative customer loyalty and investment programs introduced • Innovative financial solutions tailored to customer needs developed • Long-term relationship-based service model adopted • "You Are at the Center of Investment" value proposition strengthened • Easier access to investment products provided • Digital investment experience further enhanced
Commercial Banking Experience	Retail Banking Experience

"A Data-Driven Phygital Banking Approach"

In 2025:

- 6.9% Increase in the Number of Non - Deposit Investment Customers
- 48.6% Growth in Total Non - Deposit Assets
- 19% Increase in Mobile Channel Transaction Volume
- We continued to provide services through 45 ATMs across Türkiye.

Across both commercial and retail banking, we prioritize building long-term, trust-based customer relationships. While placing customer satisfaction at the heart of our strategy, our Contact Center continuously analyzes customer needs and expanded its outbound calling capacity by 2.5 times during 2025, enabling broader customer outreach. Through our Customer Feedback Management framework, we conducted root cause analyses to implement sustainable improvements, resulting in a 17% improvement in customer feedback performance.

Through ongoing investments in digitalization and artificial intelligence, we continue to simplify customer journeys while improving operational efficiency.

DELIVERING A DIGITAL BANKING EXPERIENCE THROUGH THE ODEA MOBILE APP

Built around our "You Are at the Center of Investment" proposition, the Odea mobile application delivers an investment-focused, data-driven, and human-centered digital banking experience. The application enables customers to access investment products more easily while offering personalized financial solutions, free digital banking services, and intuitive features that simplify everyday banking.

Throughout 2025, several human-centered enhancements were introduced to the Odea application. The new Quick Login feature enables secure access through facial recognition and fingerprint authentication without requiring a password, reducing both login time and the number of transaction steps. The home screen was completely redesigned, introducing a personalized "For You" menu based on customer behavior while making campaigns and exclusive offers more visible. In addition, the Odea programs were integrated into the application's menu structure, allowing customers to access loyalty programs and benefits through a single interface. These improvements significantly enhanced customer satisfaction across Odea's digital channels while establishing a stronger foundation for sustainable growth.

As of 2025:

- Our mobile application was downloaded more than 540,000 times.
- Approximately 250,000 customers actively used our digital channels during the year.
- We increased the number of accounts opened via video calls by 22% compared with 2024.

Throughout the year, we further enhanced the user experience for equity and precious metals trading by integrating financial statements, investment data, and calculation tools into the application, enabling customers to make more informed investment decisions. We also introduced an economic calendar, investment news, and daily market bulletins, allowing customers to monitor financial developments in real time.

INNOVATIVE PRODUCTS AND SERVICES

We continued to develop innovative products and services aligned with our customers' evolving lifestyles and digital expectations. Through our open banking infrastructure, customers can manage financial assets held at different banks from a single platform, delivering a more integrated, seamless, and efficient banking experience.

Through Rob'O, our AI-powered investment advisory solution, we provide customers with personalized investment recommendations. By offering risk-profile-based investment suggestions and virtual portfolio solutions, we make investing more accessible, transparent, and easier to understand.

In the area of payment systems, we:

- Enhanced our contactless and online payment infrastructure.
- Introduced a virtual debit card that enables customers to make purchases without requiring a physical card, helping reduce plastic consumption.
- Encouraged customers to receive their credit card statements through digital channels to support lower paper consumption.
- Expanded the use of digital receipts, contributing to a reduction in paper consumption.
- Added TROY branded cards to our product portfolio.
- Developed segment specific card solutions tailored to the diverse needs of our customers.

In addition, we launched the **Odea Privileges World** program, enabling customers to convert credit and debit card spending into investment opportunities and offering an innovative value proposition that combines everyday banking with long-term wealth creation.

OPEN BANKING

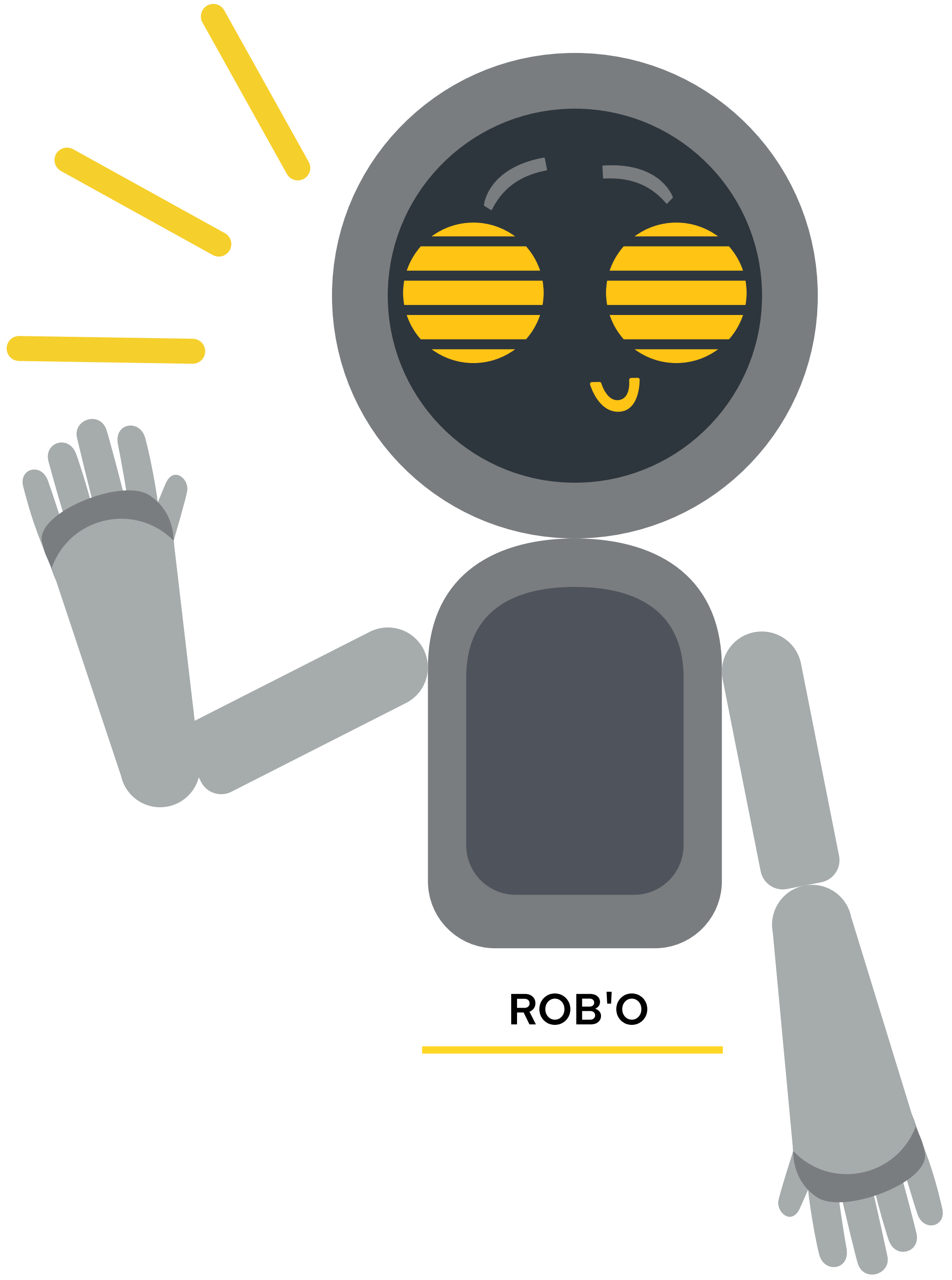
Through our Open Banking infrastructure, we enable both retail and commercial customers to integrate their account information held at different banks into the Odea mobile application, providing access to their financial data through a single platform. This allows us to deliver a faster, more secure and seamless digital banking experience.

ROB'O

Through Rob'O, our AI-powered investment advisory solution, we provide customers with investment recommendations tailored to their individual risk profiles. Using virtual portfolio tools and data-driven insights, we make investment processes more accessible, intuitive and user-friendly.

PAYMENT SOLUTIONS

While continuously enhancing our contactless payment infrastructure, we also contribute to reducing paper consumption through our digital receipt solution. By expanding our product portfolio with TROY-branded cards and offering customer segment-based card solutions, we deliver more personalized payment experiences.



ROB'O

TECHNOLOGY AND DATA-DRIVEN TRANSFORMATION

We position technology not merely as an enabler of operational processes, but as a strategic driver that strengthens customer experience and enhances our value creation capacity.

Throughout 2025, we continued to modernize our technology infrastructure and strengthen our digital transformation investments. By migrating our critical applications to an active-active data center architecture, we enhanced our operational resilience and further strengthened our ability to provide uninterrupted services to our customers.

Through Odeatech, our subsidiary established in 2024 to operate in banking technologies and conduct research and development operations within Dijitalpark Teknokent, we further enhanced our in-house technology development capabilities. Leveraging artificial intelligence-powered tools, advanced analytics and data-driven applications, we continued to improve customer experience and strengthen our decision-making processes.

During the reporting period, research, development and innovation operations focused on developing next-generation technology solutions that support Odeabank's digital transformation objectives. These solutions were successfully deployed into production environments. In addition to launching new products and services, existing systems were substantially redesigned and enhanced using advanced technology approaches.

A total of 20 R&D projects were conducted during the reporting period. Of these, six were successfully completed, thirteen remained actively in progress, and one new R&D project received approval from the Dijitalpark Teknokent administration. With the launch of new initiatives during 2025, our project portfolio expanded significantly in the areas of artificial intelligence, data analytics, big data management and digital banking technologies.

As part of the new products and services introduced during the reporting period, we developed data-driven decision support systems, AI-powered analytics and question-answer solutions, centralized data management infrastructure, applications enhancing the digital customer experience and software solutions designed to optimize operational processes. These developments improved the speed, accuracy, security and efficiency of our banking operations.

In parallel, we significantly enhanced the technological infrastructure of our existing products and services through improvements in performance, scalability, cybersecurity and user experience. Existing systems were redesigned using modern API management and security layers, Data Lakehouse architectures, big data processing technologies and contemporary software development methodologies.

These enhancements have enabled us to build more sustainable, flexible and future-ready technology platforms capable of supporting the evolving needs of digital banking.

The solutions developed through our R&D operations have not only strengthened existing business processes but have also reinforced our data-driven management approach, enhanced customer experience and generated innovative technological capabilities that contribute to our long-term digital transformation objectives.

To foster our culture of innovation, we continued implementing our Innovation Cycle program, collaborating closely with business units through agile methodologies and rapid prototyping practices. Within this framework, we developed Proof of Concept (PoC) initiatives to improve process efficiency and test new business models.

At Odeabank, we view technology not simply as a supporting function but as a strategic lever that strengthens our business model and enhances our capacity to create long-term value. Accordingly, we continue to prioritize technology investments in line with our operational excellence and digital transformation objectives.

Through our Technology, Operations and Information Security functions, we ensure that all processes—from core banking systems to digital channels—operate securely, seamlessly and in full compliance with applicable regulations. At the same time, we promote a culture of innovation across the Bank by implementing initiatives that encourage continuous improvement.

Our digital transformation has also contributed to our sustainability performance. Through infrastructure modernization and digitalization initiatives, we improved energy efficiency, optimized operational continuity and resource utilization, and reduced paper consumption by digitizing business processes. Through these efforts, we contribute to SDG 9 – Industry, Innovation and Infrastructure and SDG 12 – Responsible Consumption and Production.

Furthermore, to support our data-driven transformation, we established big data infrastructure and implemented robotic process automation (RPA) and generative artificial intelligence applications, further enhancing our operational efficiency and accelerating decision-making processes.

INNOVATION CYCLE

As part of the Innovation Cycle, one of Odeabank's open innovation initiatives, our Innovation and Consulting Department collaborates with the Bank's business units to identify technology needs and facilitate ideation sessions. Following an initial assessment, potential focus areas are identified, and financial collaboration opportunities are evaluated. The resulting ideas are implemented through a PoC approach, enabling us to address business units' technology needs while improving processes and increasing operational efficiency.

Established in 2024 in line with Odeabank's strategic objectives, the Innovation and Consulting – Advanced Analytics Department is responsible for bringing innovative ideas to life, building ecosystem partnerships, and fostering a culture of innovation across the Bank. To accelerate the discovery and validation of new business models, products, and services through a test-and-learn approach, the department launched the Innovation Cycle program. By applying agile methodologies and rapid prototyping, we encourage a culture of experimentation and continuous improvement throughout the Bank. Cross-functional ideation workshops are conducted to identify operational pain points, evaluate industry trends, and assess competitors' approaches, while developing high-level solution proposals aligned with the Bank's strategic priorities.

Proofs of Concept are carried out to rapidly test high potential ideas and identify programs and solutions that can be implemented in the near term. Through our Odea in Vision sessions, we bring together industry experts to discuss emerging developments and application areas in financial services while exploring potential use cases that can create value for the Bank. As part of this initiative, a Banking as a Service Webinar was held to examine evolving business models and opportunities in the sector. In addition, our Technology Radar innovation bulletin is shared daily with Senior Management to provide updates on industry developments, strategic partnerships, and key technological innovations relevant to the financial sector.

ADVANCED ANALYTICS (CENTER OF EXCELLENCE)

To strengthen our data-driven decision-making capabilities and maximize the value created through artificial intelligence technologies, our Advanced Analytics Unit continued to operate as a strategic **Center of Excellence** supporting the Bank's material topics. Positioned within Retail Banking while serving the entire organization, the unit develops digitalization and personalization-focused solutions that contribute to enterprise-wide value creation.

Our Advanced Analytics Unit integrates both internal and alternative data sources to generate deeper insights into customer behavior, develop segment-based strategies, and implement advanced analytics solutions that enhance customer satisfaction. Leveraging data generated through the open banking ecosystem, the unit focuses on designing personalized products and services while developing sophisticated models for deposit pricing optimization and investment return enhancement.

Throughout 2025, we continued to expand our use of artificial intelligence and generative AI technologies to improve operational efficiency and enrich the customer experience.

We developed predictive models to better understand our customers' investment and savings preferences, accelerating our data-driven transformation journey. These initiatives enhanced the effectiveness of our decision-making processes and strengthened our capacity to create sustainable long-term value.

OUR DATA-DRIVEN CUSTOMER EXPERIENCE APPROACH

Through our Retail Banking CRM Unit, we develop data-driven marketing and communication strategies by analyzing customer data through advanced analytical models, strengthening our customer segmentation capabilities. Through personalized communications and targeted campaigns, we aim to increase customer engagement while delivering solutions tailored to individual needs and expectations.

We continuously improve the customer experience through a culture of ongoing development, reinforcing our stakeholder focused value creation approach.

This integrated approach strengthens customer loyalty while enabling us to proactively manage customer attrition risk. At the same time, we continuously improve the customer experience through a culture of ongoing development, reinforcing our stakeholder-focused value creation approach.

We manage customer suggestions, complaints, objections, and requests efficiently through our multi-channel service model. Feedback received through digital channels, our website, Contact Center, social media, branches, and official platforms is evaluated in accordance with our Customer Feedback Management Procedure.

During 2025, 6,523 of the 6,530 complaints received, including those carried over from the previous reporting period, were successfully resolved. The average complaint resolution time was maintained at 1.5 days.

This systematic approach has also been recognized by independent customer experience award platforms:

- **Şikayetvar ACE – Banking Category B Diamond First Place Award: Awarded first place for the fourth consecutive year.**

Our Retail Banking CRM Unit manages data-driven marketing and communication strategies to ensure that our retail banking products and services reach the appropriate customer segments effectively and at the right time. By leveraging analytical models, we strengthened our segmentation approach and structured our campaign management and content development processes around customer needs and expectations. Through personalized communication initiatives, we sought to increase customer engagement and deliver our value proposition more effectively.

Through our "Voice of Customer" platform, we analyze real-time feedback collected across multiple customer touchpoints, enabling us to continuously monitor customer expectations and evolving needs.

Customer Contact Center

In 2025, our Customer Contact Center, supported by a team of 98 specialists, continued to deliver uninterrupted service through its human-centered technology infrastructure and omnichannel service model, ensuring a consistently high-quality customer experience.

As part of our 24/7 service model, we complemented traditional voice communication channels with video banking services available between 08:00 and 02:00, providing customers with a flexible, accessible, and inclusive experience across multiple touchpoints.

Customer Experience Performance Metrics	2024	2025
Retail Banking NPS* Score	50	31
Private Banking NPS Score	48	**52**
Commercial Banking NPS Score**	55	-
Number of Customer Complaints Received	6,272	**6,530**
Number of Complaints Responded To	6,282	**6,523**
Number of Complaints Resolved	6,282	**6,523**
Customer Contact Center Interactions	693,648	**1,101,451**
Customer Contact Center Service Level	82%	**83%**
Call Answer Rate	96%	**97%**
Number of Products Offered	13	13
Average Complaint Resolution Time	1.5 days	1.5 days

**NPS: Net Promoter Score. A customer experience metric that measures customers' likelihood of recommending the relevant service or brand. In 2024, the NPS and overall satisfaction survey was conducted by Ipsos using the CATI method and a different survey structure. As of 2025, our measurement methodology was revised, the survey sample was optimized to better reflect the CRM customer profile, and the questionnaire was redesigned. Therefore, the 2024 and 2025 results are not directly comparable.*

*** As the Commercial Banking NPS score was not included within the scope of measurement during the 2025 reporting period, no score was calculated for 2025.*

Throughout the year, we also continued to strengthen customer loyalty through investment-focused campaigns and loyalty initiatives such as our "Refer a Friend" program.

DATA SECURITY AND CYBER RESILIENCE

At Odeabank, we consider the protection of our customers', employees', and business partners' data to be an integral part of our risk management, corporate governance, and sustainable value creation approach.

Capitals:

- Social Capital
- Intellectual and Manufactured Capital
- Human Capital

Related Materiality Topics:

- Cybersecurity and Data Security
- Risk Management
- Prevention of Financial Crime

Accordingly, we view information security not only as a technical requirement but also as a strategic priority that reinforces stakeholder trust and safeguards our corporate reputation. Throughout 2025, we continued to strengthen our information systems, technology infrastructure, data assets, and digital processes through an integrated approach encompassing people, processes, and technology.

During the reporting period, we maintained our information security practices in line with applicable national regulations, particularly the Regulation on Banks' Information Systems and Electronic Banking Services issued by the BRSA, as well as international best practices. To ensure the confidentiality, integrity, and availability of information, we continuously monitored and analyzed system logs across our technology infrastructure.

Under the coordination of our Information Security Committee, we continued to ensure compliance with national and international regulatory requirements while maintaining a proactive risk management approach to address the evolving cyber threat landscape.

Further information on our governance structure is available in the *"Corporate Governance and Our Sustainability Governance"* section of this report.

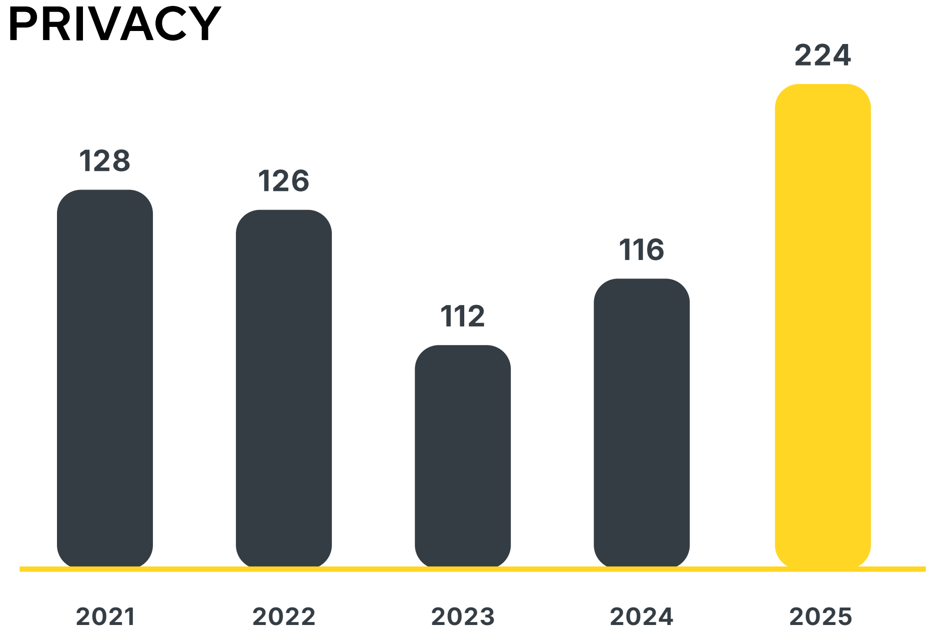
As part of our supply chain security approach, we continued to assess the information security risks associated with third-party service providers and implemented the necessary control mechanisms. This approach helps prevent operational disruptions while supporting secure digital operations across our business partner ecosystem.

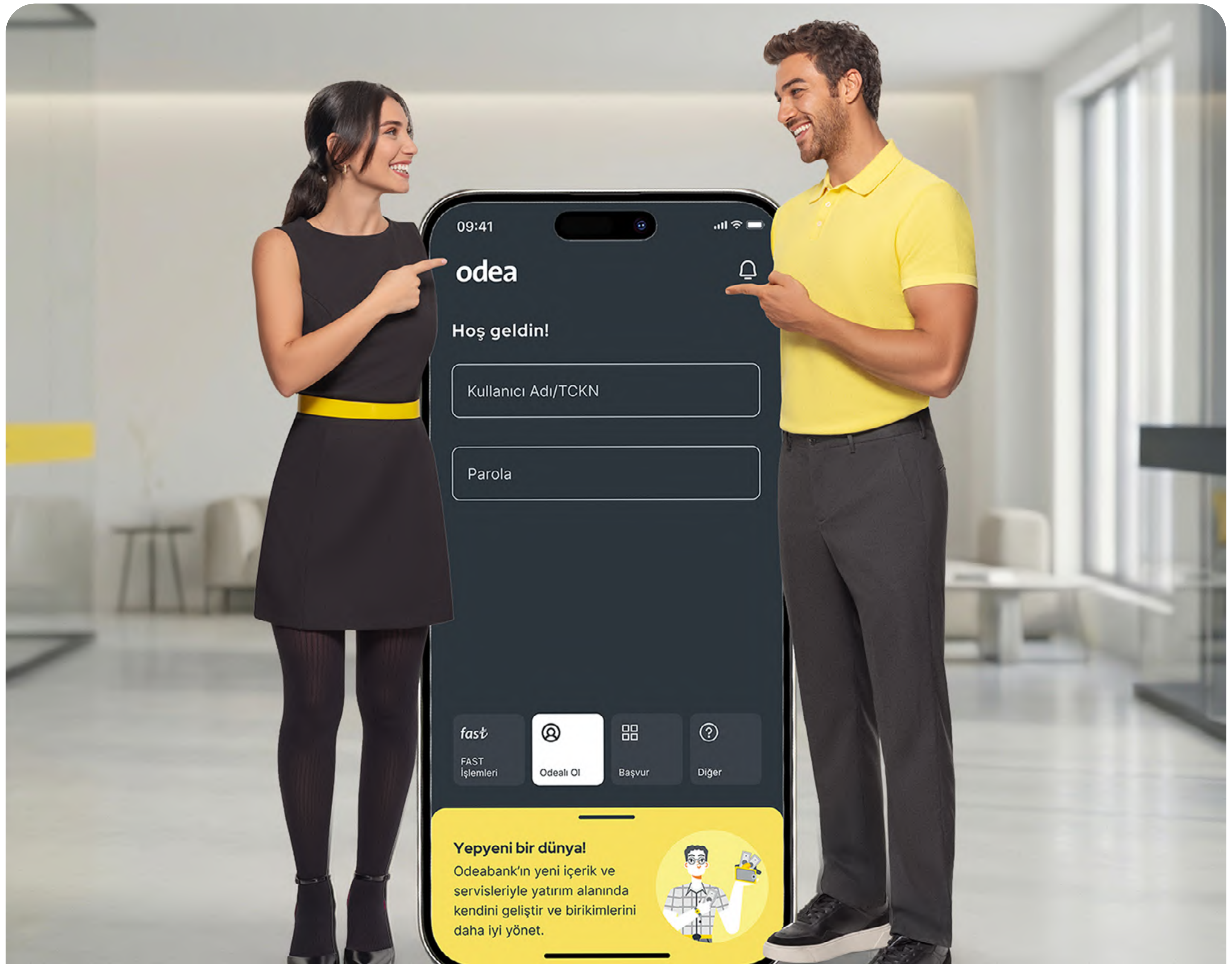
Recognizing that cybersecurity depends on both technology and people, we continued to strengthen our information security culture through regular training and awareness programs for employees and external personnel with system access. Training content was regularly updated to reflect emerging cyber threats, enabling us to continuously enhance information security awareness across the organization.

To support a secure digital banking experience for our customers, we also conducted awareness campaigns throughout 2025 on fraud prevention through SMS, email, and push notifications, providing guidance on identifying and avoiding potential fraud attempts.

Our *Privacy Policy* is available here.

NUMBER OF COMPLAINTS RECEIVED REGARDING VIOLATION OF CUSTOMER PRIVACY





OPERATIONAL RESILIENCE AND BUSINESS CONTINUITY

At Odeabank, we consider operational resilience and business continuity essential to providing our customers with reliable and uninterrupted services. To ensure that our operations continue with minimal disruption during disasters, crises, technical outages, cyber incidents or operational disruptions, we maintain an integrated framework comprising policies, plans, procedures, testing and awareness activities. This framework covers critical business processes, relevant teams, information assets, information technology and communications infrastructure, workplaces and critical service providers. Business continuity, crisis communication and crisis management documents are reviewed regularly, while related processes are monitored in coordination with crisis management teams and the relevant committees and teams.

Based on regularly conducted business impact analyses, redundancy, recovery and continuity scenarios are developed for infrastructure supporting critical processes, products and services, and backup systems are tested periodically. Geographical redundancy, alternative operational infrastructure and data centre architecture strengthen our operational resilience and digital service continuity.

Periodic crisis and emergency communication tests are also conducted. The Emergency Communication System (ADİS) enables rapid contact with all employees and centralised monitoring of their status. Through training and awareness activities tailored to different roles and responsibilities, we aim to embed business continuity management as an institutional approach that supports operational resilience, customer trust, employee safety and the Bank's long-term resilience.

STRENGTHENING FINANCIAL RESILIENCE

We view financial resilience not only through the lens of access to financ but also through access to information, financia awareness, and informed decision-making.

Capitals:

- Financial Capital
- Social Capital
- Intellectual Capital
- Manufactured Capital

Related Materiality Topics:

- Financing the Low-Carbon Economy
- Digital Transformation
- Customer Experience
- Responsible Products and Services
- Fintech and Innovation
- Renewable Energy
- Environmental Impact
- Risk Management
- Financial and Digital Literacy
- Financial Inclusion
- Community Investment Programs

At Odeabank, we regard supporting our customers' ability to adapt to changing economic conditions and strengthen their long-term financial resilience as one of our core responsibilities. Accordingly, we develop financial solutions tailored to the needs of both retail and commercial customers while implementing initiatives that facilitate access to finance, promote informed financial decision-making, and support sustainable growth.

Guided by our **"You Are at the Center of Investment"** approach, we view financial resilience not only through the lens of access to finance but also through access to information, financial awareness, and informed decision-making. Through our digital banking infrastructure, investment-focused products and services, financial content ecosystem, and advisory solutions, we aim to strengthen our customers' long-term financial well-being.

Throughout 2025, we:

- expanded our portfolio of investment-focused products and services;
- developed digital solutions that support customers' financial decision-making processes;
- strengthened financing and advisory services tailored to different customer segments; and
- continued to enhance our digital content and platforms promoting financial literacy.

For our commercial customers, we strengthened our end-to-end solution approach across project finance, syndicated loans, and restructuring processes while continuing to provide dedicated financing support for exporters, women entrepreneurs, and companies investing in transformation initiatives.

Through our Green Transformation Loan Program, we continued to finance our customers' investments in energy efficiency, renewable energy, and low-carbon production. Beyond financing, we also provided advisory services to support our customers throughout their digital and green transformation journeys. To strengthen organizational capabilities and promote sustainability-driven transformation, we delivered Sustainability Training to 73 participants, consisting of customers and sustainability ambassadors.

Within Retail Banking, we continued to develop products and services that encourage savings and investment habits under our investment-focused banking approach. Through Odea Privileges World, our digital investment solutions, and personalized financial experience applications, we supported our customers in becoming more active, informed participants in the financial system.

ACCESS TO FINANCIAL KNOWLEDGE

We consider financial literacy to be a strategic responsibility that contributes to broader social development. Accordingly, we publish accessible and practical content on investment, savings, and personal budgeting through our digital platforms to make financial knowledge more widely available and easier to understand.

Through our *O'Blog* and *O'Mag* platforms, we continue to support financial literacy across society, while our investment-focused publications are made available through the Odea Investment Bulletin, enabling customers to follow market developments more closely and make more informed financial decisions.

OUR FINANCIAL CONTENT ECOSYSTEM

As part of our investment-focused banking approach, we continued to enhance access to financial knowledge through our digital content platforms. Through our podcasts, investment focused radio programs, investment insights, and digital content, we kept our customers informed about the latest developments in the investment landscape.

ODEA RADIO

Through Odea Radio, Türkiye's first and only 24/7 bank-operated radio station, we continue to make financial content more accessible, inclusive, and available across a variety of formats. By delivering investment, finance, economy, and lifestyle content through audio broadcasts, we support broader access to financial knowledge.

In 2025, we expanded our content offering with investment focused programs including Investment Focused Podcast, Investment Focused Agenda, and The Voice of Investment, alongside weekly market insights. This enabled us to provide an accessible experience that catered to diverse user needs and content consumption preferences, extending beyond traditional written content.

As of December 2025, Odea Radio reached an average of 175,071 monthly listeners, representing a 95% increase in audience size compared to the previous year. With this performance, Odea Radio ranked 7th among Karnaval Media's digital radio stations.

Throughout 2025, Odea Radio recorded a total of 3,498,645 listens, with listeners spending a cumulative 24,277 hours tuned in.

odea radyo

INVESTMENT-FOCUSED PODCAST

In line with our "You Are at the Center of Investment" approach, our Investment-Focused Podcast continued with its third season in 2025. During the year, we released 14 new episodes, bringing the series to a total of 42 episodes and 420,743 listens by year-end.

Throughout 2025, the Investment-Focused Podcast consistently ranked among Türkiye's Top 10 podcasts in the finance and investment category. This achievement demonstrates the broad reach of our digital content designed to promote financial literacy and investment awareness.

TODAY'S INVESTMENT HIGHLIGHTS

As part of our Investment Focused Banking approach, we shared clear and accessible updates on developments in global markets with our customers every weekday through the Odea X account, with the aim of making financial literacy a part of everyday life.

ACCESSIBLE AND INCLUSIVE BANKING

We believe that access to financial services should be equitable and inclusive for everyone, and we design our products, services, and communication channels to address diverse needs.

Capitals:

- Social Capital
- Human Capital
- Intellectual Capital
- Manufactured Capital

Related Materiality Topics:

- Digital Transformation
- Diversity, Equity and Inclusion
- Talent Management
- Customer Experience
- Responsible Products and Services
- FinTech and Innovation
- Financial and Digital Literacy
- Financial Inclusion
- Community Investment Programs

At Odeabank, we view accessibility not merely as physical access or digital usability, but as a fundamental component of our financial empowerment approach. We aim to ensure that individuals of different age groups, digital competency levels, and accessibility needs have equal access to financial services, information, and opportunities.

We approach access to banking services not only from a digitalization perspective, but also through the principles of accessibility, inclusion, and equal customer experience.

As digital banking continues to expand, we prioritize strengthening digital inclusion by addressing the varying levels of access to and proficiency in digital channels across different customer groups.

Throughout 2025, we:

- implemented improvements to enhance the user experience across our digital channels,
- continued to offer our customers accessible, omnichannel communication options,
- expanded our video call services to facilitate easier access to banking transactions,
- enhanced our customer communication processes to address the needs of different customer groups,
- expanded sign language-supported video services and accessible communication practices to promote digital inclusion,
- made our customer information documents and banking agreements accessible through sign language and audio description features,
- and, guided by the principle that "every child has the right to listen to stories," added audio description and sign language features to the digital versions of Eşit Masallar (Fair Tales), aiming to enable children with visual and hearing differences to access the stories.

As part of our accessible banking approach, we prioritize keeping our digital platforms simple, intuitive, and user-friendly, while continuing to provide uninterrupted service across multiple customer touchpoints through our Customer Contact Center and branch network.

Metrics	2025
Number of sign language-supported content pieces	25
Reach / views of sign language videos	11,600,879
Number of customers opening accounts via video banking	63,732
Total number of video banking sessions	100,494
Number and percentage of branches with accessibility enhancements	35
Number of branches equipped with Disabled Assistance Call Buttons	35
Reach of financial literacy content	281,789,168
Investment - focused podcast listening figures	194,786
Number of employees receiving accessibility training	405

We adopt a holistic approach to accessibility across all our touchpoints, aiming to make it an integral part not only of the customer experience but also of our corporate culture. In 2025, we organized training sessions for our employees and business partners to enhance awareness and understanding of accessibility. Under the Odea Radio platform, we launched the "Conversations on Accessibility" radio program in collaboration with our stakeholder, Accessible Everything (Erişilebilir Her Şey).

To evaluate and enhance the accessibility of our digital banking services, we conducted a comprehensive assessment and prepared an Accessibility Status and Recommendations Report for our website and mobile application. We also introduced audio description and sign language options for the agreements available on our website, including our General Banking Agreements and agreements relating to deposit, investment, and loan products, making access to our products more inclusive.

We view financial inclusion not merely as access to financial products and services, but as empowering individuals to participate in the financial system in an informed, confident, and independent manner.

To improve the physical accessibility of our branch network, we implemented various enhancements, including access ramps, tactile paving, Braille signage, and accessible service areas designed to meet the needs of customers with diverse accessibility requirements. In selected branches, we introduced a Disability Assistance Call Button, enabling customers to access assistance more quickly whenever needed.

We continue to support customers with physical disabilities by equipping all of our ATMs with voice-guided menu functionality. In addition, transaction notifications within our digital banking services have been designed to be compatible with screen readers, enabling customers with visual impairments to independently monitor and manage their banking operations.

We view financial inclusion not merely as access to financial products and services, but as empowering individuals to participate in the financial system in an informed, confident, and independent manner. Through Akademi'O, O'Blog, our investment-focused content, podcast series, and digital learning tools, we continue to expand access to financial knowledge. We consider financial literacy to be a fundamental enabler of financial inclusion and aim not only to improve our customers' access to financial services but also to support them in making informed financial decisions.

Through products and financing solutions tailored to the needs of women entrepreneurs, exporters, and diverse customer segments, we continue to expand access to financial services while strengthening our inclusive growth approach. Our solutions supporting women's access to finance aim to increase their participation in economic life and contribute to sustainable development.

To ensure the continued advancement of our accessibility strategy, we provide training and awareness programs that enhance our employees' knowledge and capabilities in this area. We are committed to embedding accessibility and inclusion not only within the customer experience but also throughout our corporate culture.

Through this approach, we aim to support our customers not only in accessing financial products and services but also in participating in the financial system in a more informed, empowered, and independent way.

STAKEHOLDER OPINION

Seben Ayşe Dayı

Co-Founder, Accessible Everything

When we first encountered Odeabank's Eşit Masallar (Fair Tales) project, our immediate thought was:

Why shouldn't Eşit Masallar (Fair Tales) be truly fair and accessible for everyone?
That simple question marked the beginning of a four-year collaboration between Accessible Everything and Odeabank. We believed that these stories, reimagined through the lens of equality, should be accessible to all children. As an organization committed to making the world more accessible for people with all types of disabilities, we contributed to the project by providing sign language interpretation, audio description, and subtitle solutions. Together, we enabled children with hearing impairments, visual impairments, and other accessibility needs to enjoy these stories on equal terms.

Following the successful implementation of the accessible Eşit Masallar (Fair Tales) project, we began working closely with various Odeabank departments to explore how the banking experience could become more inclusive for people with disabilities. Through practical examples, we shared opportunities for improvement directly with decision-makers.

We quickly completed regulatory requirements such as making contractual documents accessible through sign language and audio narration. However, what impressed us most was that Odeabank never viewed accessibility as merely fulfilling legal obligations.

Together, we organized awareness training programs across the Bank and continue to deliver these sessions regularly. Wanting accessibility awareness to extend beyond the organization itself, Odeabank also partnered with us to launch the "Conversations on Accessibility" podcast series.

Working with this dynamic department, which embraces accessibility as a fundamental human right, has consistently enabled us to stay one step ahead. Through our research on the "barriers to customer experience" in both physical and digital banking, we identified the needs of different disability groups when using banking services. Based on these findings, we continue to implement the recommendations set out in our comprehensive accessibility assessments, delivering tangible improvements across both physical and digital channels.

We sincerely thank Odeabank for embracing this approach and for its unwavering commitment to creating a truly accessible and inclusive banking experience.

MÜGE İŞTEBEN

Learning and Development Management

Assistant Manager

İstanbul

Responsible Transition Finance

FINANCING THE TRANSITION TO A LOW-CARBON ECONOMY

At Odeabank, we believe that the transition to a low-carbon economy depends on the financial system's ability to channel capital toward sustainable investments.

Capital:

- Financial Capital
- Social and Relationship Capital
- Intellectual Capital
- Human Capital
- Natural Capital

Related Materiality Topics:

- Financing the Low-Carbon Economy
- Responsible Products and Services
- Renewable Energy
- Environmental Impact
- Risk Management

We aim to go beyond managing the environmental impacts of our own operations by supporting environmentally and socially responsible practices across the sectors we finance and contributing to our customers' transition toward lower-carbon, more efficient, and more resilient business models.

We view sustainable finance as extending beyond a portfolio of dedicated products and services. Our approach encompasses our lending policies, risk assessment processes, customer relationships, and internal capabilities. Through financing solutions focused on climate change mitigation, resource efficiency, renewable energy, energy efficiency, and low-carbon production investments, we seek to address our customers' transition needs.

OUR ROLE IN THE TRANSITION TO A LOW-CARBON ECONOMY

We Provide Financing
We support our customers' investments in energy efficiency, renewable energy, and low-carbon production.

We Manage Risks
We focus on integrating environmental and social considerations more systematically into our lending processes.

We Measure Our Impact
As a signatory to the PCAF, we continue to strengthen our capabilities for measuring financed emissions.

We Build Capacity
Through our Sustainability Ambassadors Program and sustainable finance training initiatives, we enhance the capabilities of our customer-facing departments.

1,452

employees completed more than 3,150 hours of mandatory environmental training.

In 2025, we continued to strengthen our sustainable finance product portfolio and support our customers' transformation journeys through products such as the Green Transformation Loan and Green Deposit. Within this scope, we provided a total of **TRY 447 million** in green transformation financing throughout the year.

The Green Transformation Loan is our sustainable finance product designed to support the investments of our commercial customers that have the potential to improve energy efficiency, resource efficiency, renewable energy use and environmental performance. The product was structured with the aim of expanding our green asset portfolio and integrating a sustainability perspective into credit processes in a more systematic manner.

Under the program, eligible investments are assessed by considering their contribution to energy or resource efficiency, use of green technologies and greenhouse gas emission reduction potential. For eligible projects, through a technical assessment approach, we aim to make the potential environmental benefits of financed investments more measurable and traceable.

Through this approach, we address sustainable finance not only in terms of the financing volume provided, but also together with eligibility criteria, environmental impact potential and portfolio monitoring. In this way, while supporting our customers' transition to low-carbon and resource-efficient business models, we aim to contribute to the more systematic monitoring of the environmental impact we create through financing.

To strengthen our sustainable finance approach, we focus on evaluating environmental and social risks in our financing decisions in a more systematic manner. Within this scope, we integrate a sustainability perspective into our credit processes and aim to monitor, assess and manage the environmental and social impacts of financed projects more effectively. In line with this approach, **707 loans** were assessed in 2025, while the share of conditionally approved loans related to the alcohol and tobacco sectors in the portfolio stood at 1.16% as of year-end. No project was approved in 2025.

Through our PCAF signatory status, we aim to strengthen our efforts to measure financed emissions and make the climate impact of our portfolio more visible and manageable.

In the transition to a low-carbon economy, our customers may differ in terms of data readiness, investment capacity, the pace of transformation across sectors and technical knowledge needs. For this reason, we do not limit our sustainable finance approach to product offerings alone; we address it together with customer guidance, data collection capacity, risk assessment processes and internal capability development.

In this context, we attach importance to enhancing the knowledge and capabilities of our customer-facing teams in sustainable finance, climate risk and environmental and social impact. In 2025, we delivered sustainable finance and climate-focused sessions for our Commercial Banking teams, and designed a dedicated program through which we conducted presentations to raise awareness among our commercial customers on their green transformation journeys and accompany these processes within the framework of sustainable finance.

STAKEHOLDER OPINION

Ulaş Ergenç

Head of Construction, Real Estate and Valuation Group

Sustainability is no longer simply an objective for us—it has become an integral part of our daily operations. By obtaining I-REC certificates for all of our branches, we have officially verified that the electricity we use is sourced from renewable energy.

With the solar power systems installed at our Ataşehir Contact Center and Bodrum Branch, we have also become an energy producer. By converting all of our branches to LED lighting, we have reduced both our carbon footprint and our energy costs. When combined with our electric vehicle charging infrastructure, these initiatives demonstrate how comprehensively we approach energy efficiency.

I believe that every step, no matter how small it may seem, contributes to a much larger picture. We are confident that we are moving in the right direction, and our focus now is on maintaining this momentum.

In addition, the Odeabank Sustainability Team delivered one hour Sustainability Training program for our commercial banking customers and Commercial Banking branch employees. The training covered sustainable finance practices, sustainability regulations and emerging developments, climate related risks, and environmental and social impact management, contributing to greater awareness and knowledge in these areas. To further strengthen sustainability awareness across the Bank, we delivered a total of **3,150 hours of training to 1,452 employees** during the year.

Sustainability Ambassadors

We continue to implement our "Sustainability Ambassadors" programs through branch portfolio managers who receive specialized training on climate change and the transition to a low-carbon economy. Our ambassadors provide guidance to customers on sustainable finance, climate risk, and responsible investment while supporting the monitoring and reporting of the environmental and social impacts of financed projects, thereby playing an active role throughout customers' transition journeys. In recognition of their valuable contributions and dedication throughout the year, we presented our Sustainability Ambassadors with awards consisting of sustainable products during our year-end event.

As of 2024, 19 employees participated in the Sustainability Ambassadors Program, receiving a total of 38 hours of training.

Through this comprehensive approach, we address the transition to a low-carbon economy from multiple perspectives—including product development, risk management, customer guidance, internal capability building, and impact measurement—and position sustainable finance as a key driver of long-term value creation.

Looking Ahead – Our Areas of Focus

- Further expand our sustainable finance product portfolio.
- Strengthen our financed emissions measurement methodology.
- Broaden the integration of environmental and social risk assessment processes.
- Enhance our capacity to guide customers throughout their transition journeys.
- Regularly monitor and evaluate our sustainable finance performance.

STAKEHOLDER OPINION

Esel Gürsel

Portfolio Manager/ Sustainability Ambassador

At Odeabank, we believe that the financial sector has a significant responsibility in building a more livable world for future generations. Accordingly, we place sustainable development at the core of our operations. Practices that support sustainable development have become an integral part of our business processes as we strive to leave a better world for future generations.

In line with this approach, sustainability at our Bank is viewed not only as an environmental responsibility but through a holistic perspective encompassing its economic, social, and governance dimensions. We integrate these principles into our business processes across all areas. While reducing environmental impacts, improving energy efficiency, and promoting the responsible use of resources remain among our priorities, we also foster a culture that supports inclusiveness, equal opportunity, and employee engagement.

While it is relatively easy for organizations to embrace this mindset and commit to implementing it, I believe that one of the greatest challenges is ensuring that stakeholders adopt the same perspective.

As a Sustainability Ambassador, I value the opportunity to contribute to spreading this culture both within and beyond our organization by raising awareness among my colleagues, helping our customers better understand sustainable solutions, and encouraging them to adopt practices that create positive impact.

RESPONSIBLE PRODUCTS AND SERVICES

We view our responsible products and services approach not merely as a product development initiative, but as a banking philosophy that accompanies our customers throughout their transformation journeys, facilitates access to finance, and supports long-term value creation.

Capitals:

- Financial Capital
- Social and Relationship Capital
- Intellectual Capital
- Natural Capital

Related Materiality Topics:

- Financing the Low-Carbon Economy
- Diversity, Equity and Inclusion
- Responsible Products and Services
- Renewable Energy
- Financial Inclusion

We support our sustainable finance approach through products and services that address our customers' environmental and social transformation needs. We continue to diversify our financial product portfolio in line with the Sustainable Development Goals by developing solutions that support the transition to a low-carbon economy, resource efficiency, renewable energy investments, inclusive growth, and women's participation in economic life.

We view Responsible Products and Services approach not merely as a product development initiative, but as a banking philosophy that accompanies our customers throughout their transformation journeys, facilitates access to finance, and supports long-term value creation. Accordingly, in 2025, we continued to enhance our products and services with a focus on green transformation, sustainable resource management, and inclusive finance.

GREEN TRANSFORMATION LOAN

Target Customer	Customer Need Addressed	Transformation Area
Commercial customers and companies in the real sector	Financing renewable energy, energy efficiency, resource efficiency, and low-carbon production investments	Transition to a low-carbon economy, climate change mitigation, and reduction of environmental impacts

GREEN DEPOSIT

Target Customer	Customer Need Addressed	Transformation Area
Commercial customers	Aligning savings and funding preferences with sustainable finance principles	Sustainable resource management, supporting the green finance ecosystem, and promoting responsible funding

WOMEN IN EXPORT SUPPORT PACKAGE

Target Customer	Customer Need Addressed	Transformation Area
Export-oriented companies led by women	Facilitating access to finance through guarantee-backed lending	Women's economic empowerment, inclusive growth, and strengthening export capacity

CLIMATE-FOCUSED TRANSITION APPROACH

While working to reduce the environmental impacts arising from our own operations, we also aim to support the transition of the sectors we finance toward low-carbon, efficient, and resilient business models.

Capitals:

- Financial Capital
- Manufactured Capital
- Social and Relationship Capital
- Intellectual Capital
- Natural Capital
- Human Capital

Related Materiality Topics:

- Financing the Low-Carbon Economy
- Environmental Impact
- Renewable Energy
- Risk Management
- Circular economy

At Odeabank, we view climate change not only as an environmental issue but as a strategic transformation area with significant implications for the financial system, the real economy, our customers, our operations, and our long-term value creation capacity.

While working to reduce the environmental impacts arising from our own operations, we also aim to support the transition of the sectors we finance toward low-carbon, efficient, and resilient business models. To this end, we continue to expand our sustainable finance products, strengthen the integration of environmental and social considerations into our lending processes, and enhance our capabilities for measuring financed emissions.

One of the key milestones in strengthening our climate-focused transition approach during 2025 was supporting our financed emissions measurement efforts through our commitment to the PCAF. In this context, we continued our preparations to make the climate impact of our lending portfolio more transparent, measurable, and manageable. Measuring financed emissions is expected to become a critical component in the further development of our climate strategy, portfolio management approach, and sustainable finance priorities.

We continue to enhance our processes in collaboration with relevant business units to assess climate-related risks and opportunities more systematically. Transition risks, physical risks, evolving regulatory expectations, customers' transition needs, and sustainable finance opportunities remain among our key focus areas. Our TSRS compliance initiatives, CDP preparations, and climate-related data management operations further strengthen our climate-related decision-making, measurement, and reporting capabilities.

As part of our efforts to reduce operational impacts, we regularly monitor our energy consumption, greenhouse gas emissions, water use, and waste performance. Through energy management practices, renewable electricity procurement, on-site renewable energy generation projects, water efficiency initiatives, waste management programs, and digitalization, we continue to support our transition toward lower-carbon operations.

We believe that climate-focused transformation cannot be achieved solely through technical measures, but also requires shared knowledge, awareness, and ownership across the organization. Accordingly, through our Sustainability Working Group, led by the Sustainability Department, we evaluate environmental action proposals submitted by business units while continuing to strengthen our internal capabilities in sustainable finance, climate risk, environmental and social impact management, energy management and efficiency, and sustainability reporting.

We recognize that the transition to a low-carbon economy presents ongoing learning opportunities related to data quality, methodological development, customer transition readiness, and varying transition pathways across sectors. Therefore, we continue to advance our climate-focused transition approach not only through targets and implementation initiatives but also by strengthening our measurement infrastructure, process maturity, stakeholder collaboration, and continuous improvement practices.

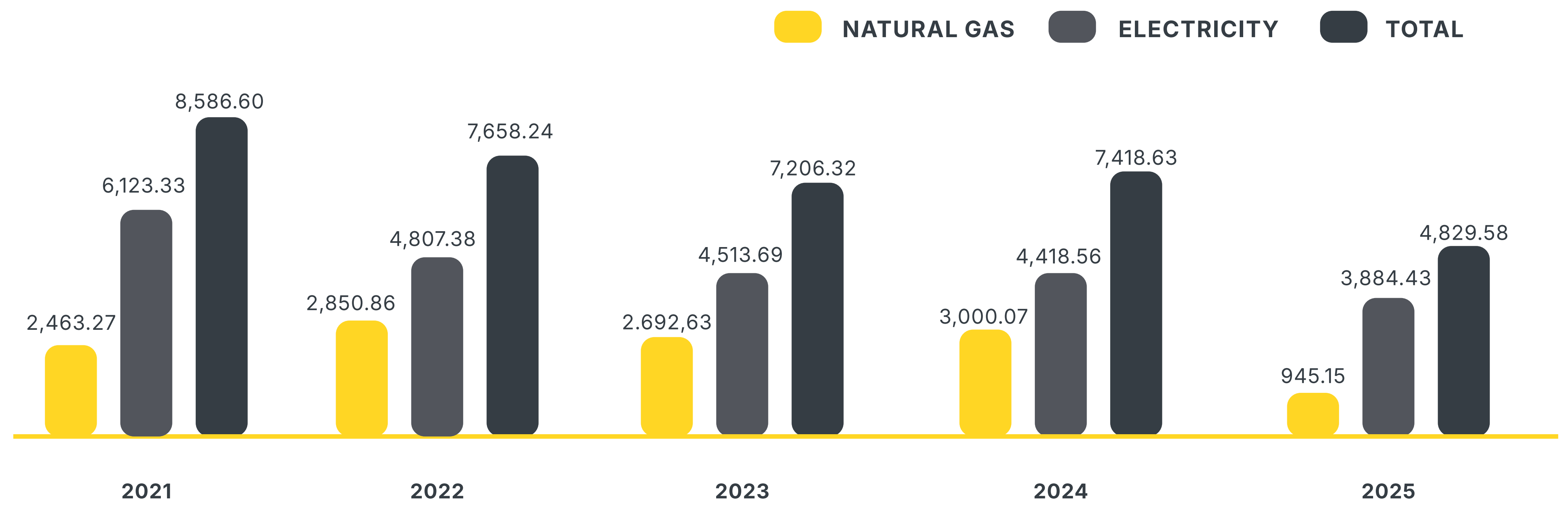
OUR CLIMATE-FOCUSED TRANSITION MODEL

We address our climate strategy through a holistic approach that spans governance, financing, emissions management, and data infrastructure.

	Governance and Ownership	Climate Risks and Opportunities	Operational Emissions Reduction	Low-Carbon Finance	Financed Emissions	Resource Efficiency and Circularity	Data, Reporting and Transparency
Our Approach	We manage our climate-focused transition through our sustainability governance framework, Sustainability Working Group, and the active involvement of relevant business units.	We assess transition risks, physical risks, evolving regulatory expectations, and our customers' transition needs.	We reduce our operational emissions through renewable electricity, energy monitoring systems, LED conversion projects, and on-site solar energy generation.	We develop financing solutions that support our customers' investments in renewable energy, energy efficiency, and low-carbon transformation.	We continue to strengthen our capabilities for measuring and managing the climate impact of our lending portfolio.	We improve resource efficiency through water conservation, waste management, digitalization, and recycling practices.	We strengthen our measurement, monitoring, and reporting infrastructure to improve the transparency of our climate performance.
2025 Focus	Evaluation of environmental action proposals, senior management awareness, and internal capability development	TSRS compliance process, CDP preparations, and the development of climate-related processes	Renewable electricity procurement, energy management initiatives, and on-site renewable energy projects	Green Transformation Loan, Green Deposit, and expansion of our sustainable finance product portfolio	PCAF membership and preparations for financed emissions measurement	Water conservation, electronic waste recycling, Registered Electronic Mail (REM/KEP), and reusable courier bag initiatives	ESG data management system, TSRS implementation, CDP reporting, and monitoring of emissions and sustainability data

ENERGY MANAGEMENT AND EFFICIENCY

Energy Consumption Trend (MWh)*



**Our total energy consumption followed a downward trend between 2021 and 2025. In 2025, our total energy consumption decreased by approximately 34.9% compared to the previous year and by approximately 43.8% compared to 2021.*

At Odeabank, energy management and efficiency constitute one of the key pillars of our approach to reducing our operational environmental impact. Across our operations, from our Head Office to our branch network, we regularly monitor energy consumption and support our transition to low-carbon banking operations through the use of renewable electricity, energy monitoring systems, energy efficiency initiatives, and on-site renewable energy generation projects.

In 2025, 100% of the electricity consumed by Odeabank and Odeatech was sourced from I-REC-certified renewable energy.

By procuring renewable electricity through I-REC certificates, we reduced our market-based Scope 2 emissions to zero while continuing to monitor emissions associated with our location-based electricity consumption. By combining renewable electricity procurement with energy efficiency initiatives, we further strengthened our operational emissions reduction approach.

To enhance energy performance monitoring, we digitally track the energy consumption of our branches and critical infrastructure systems. Building on the energy management infrastructure we have operated since 2016, we further enhanced our capabilities in 2025 through the implementation of the LENA platform, enabling a more centralized and real-time monitoring system. Through this platform, we more effectively monitor electricity consumption across all branches, strengthen our ability to respond rapidly to system failures, and support service continuity.

Our energy consumption analyses indicate that a significant proportion of branch energy use is attributable to lighting, heating, cooling, and HVAC systems. Accordingly, we continue to implement improvements in control systems, electrical panels, power factor correction systems, and equipment management processes. The completion of our LED lighting conversion program across our branch network, together with our energy monitoring practices, continues to strengthen our operational efficiency.

In line with our on-site generation and consumption approach, we continue to implement solar power projects at suitable locations. During the reporting period, photovoltaic (PV) systems with installed capacities of 10 kVA and 15 kVA were commissioned at our Ataşehir Contact Center and Bodrum Branch, respectively. These systems are expected to meet approximately 13% and 25% of each facility's electricity demand through renewable energy, contributing to a permanent reduction in our carbon footprint. In addition, a 22 kW electric vehicle charging station was commissioned at our Ataşehir Contact Center to support low-carbon transportation solutions.

In 2026, we will continue to assess and plan additional solar energy projects to expand renewable energy investments across suitable locations. Alongside infrastructure investments, we will also continue to raise employee awareness through internal communication and training initiatives aimed at reducing energy consumption and promoting the efficient use of resources.

Our Head Office building, Levent 199, is certified LEED Gold, reflecting high standards in energy and water efficiency, indoor environmental quality, sustainable site selection, and responsible material use. This certification represents an important component of our efforts to reduce our operational environmental impact.

Through our energy management and efficiency initiatives, we aim not only to reduce energy consumption but also to strengthen operational resilience, support emissions reduction, and accelerate our transition to low-carbon banking operations.

Through our Energy Management Platforms, we achieved cumulative energy savings of **65,197.44 kWh** by the end of 2025.

RESPONSIBLE RESOURCE USE

At Odeabank, we consider resource efficiency to be an integral part of reducing our operational environmental impact and supporting our transition to low-carbon operations. Across our Head Office and branch network, we pursue a continuous improvement approach in areas including water consumption, waste management, recycling, digitalization, paper reduction, and the elimination of single-use products.

By digitalizing document management and communication processes, we aim to reduce paper consumption and minimize the environmental impacts associated with our operations. While eliminating single-use plastic products at our Head Office, we also promote employee awareness through internal initiatives focused on resource efficiency, water conservation, waste reduction, and recycling.

To improve water efficiency, we continue implementing practices that promote the efficient use of water across our Head Office and branch network. During the reporting period, we expanded the sensor-operated tap system used at our Head Office to pilot branches, achieving total **water savings of 360 m³.** Internal awareness campaigns encouraging reduced water and paper towel consumption further supported environmentally responsible workplace practices.

As part of our waste management approach, we continue strengthening waste segregation and recycling practices. During 2025, we enhanced our waste separation system at our Head Office by incorporating dedicated battery recycling bins. Through our waste management initiatives, **4,452 kg of electronic waste was sent for recycling.**

To improve paper management and resource efficiency, we developed a digital platform that automatically monitors paper consumption across the Bank. Initial measurement results were obtained in November 2025. Analysis of December 2025 data showed a 20% reduction in paper consumption compared to the previous month. Based on the two-month assessment covering November and December 2025, total greenhouse gas emissions associated with paper consumption were calculated at 30 tCO_2e. These baseline results will support future resource efficiency initiatives and emissions reduction efforts. Paper consumption trends will continue to be monitored regularly, and improvement initiatives will be implemented accordingly.

We also prioritize digitalization to reduce environmental impacts associated with postal services and document delivery. By promoting the use of Registered Electronic Mail (REM) instead of physical mail and implementing a reusable courier bag system for inter-branch deliveries, we further reduced operational emissions. During 2025, 1,801 REM transactions prevented approximately 90 kg CO_2e, while 15,198 reusable courier bag deliveries avoided approximately 760 kg CO_2e. Collectively, these initiatives prevented approximately 850 kg CO_2e emissions.

We regard responsible resource use not merely as an opportunity to reduce operational costs but as an integral component of environmental impact management, employee engagement, and the integration of our climate-focused transformation strategy into our day-to-day operations.

Performance Indicators	2025
Total water consumption (m³)	12,820
2024-2025 Change in water consumption (%)	-1.19
Number of locations covered by sensor-operated tap systems	4
Scope of single-use plastic elimination	Head Office and All Branches
Methodology for Calculating Emission Reductions from KEP and Bagged Courier Services*	3,928
Reach of environmental and resource efficiency awareness initiatives	11,004

**Service is driven by the increased adoption of digital delivery channels in place of physical mail, supporting reductions in both paper consumption and postal costs.*

OPERATIONAL ENVIRONMENTAL IMPACT

At Odea Bank, we manage our operational environmental impact as a strategic priority that supports our transition to low-carbon banking operations.

Capitals:

- Manufactured Capital
- Social and Relationship Capital
- Intellectual Capital
- Natural Capital

Related Materiality Topics:

- Environmental Impact
- Renewable Energy
- Risk Management
- Circular Economy

Across our Head Office, branches, and related operations, we measure and monitor our environmental impacts and identify priority improvement areas through a data-driven approach.

We monitor our emissions and resource consumption data on a monthly basis and regularly report our key environmental performance indicators to ADQ. For the past three years, we have tracked and analyzed our greenhouse gas (GHG) emissions and ESG data through an online monitoring system. This structure supports enhanced data quality, periodic performance monitoring, improved internal coordination, and greater consistency in our reporting processes.

Our emissions data are subject to both the external assurance process conducted under TSRS requirements and the ADQ external assurance process. Scope 1 and Scope 2 (market- and location-based) are within the TSRS limited assurance boundary. Expanded Scope 3 categories reported in 2025 fall outside current assurance scope and are self-declared. Accordingly, we place significant emphasis on strengthening the scope, methodology, traceability, and supporting documentation of our emissions calculations.

We monitor our operational emissions under Scope 1, Scope 2, and relevant Scope 3 categories. While Scope 2 emissions are reported using both market-based and location-based approaches, our Scope 3 assessment is designed to provide greater visibility into the indirect impacts associated with our value chain. The measurement and management of financed emissions represent one of the key development areas within our climate transition strategy. As a signatory to PCAF, we continue to strengthen our efforts to measure and manage the climate impact of our lending portfolio in a more systematic manner.

To strengthen our decarbonization roadmap and target-setting process, we plan to calculate all relevant and materiality Scope 3 categories in 2026. During the same period, we also aim to complete our CDP Climate Change disclosure and develop a more structured climate action plan to support our emissions reduction targets as part of the UN Global Compact Climate Ambition Accelerator Programme.

Baseline referenced target will be defined with a baseline year and quantified reduction pathway in 2026/2027 under the UN Global Compact Climate Ambition Accelerator, progressing towards TSRS/ISSB alignment.

STAKEHOLDER OPINION

Cengiz Arslan

Assistant Accounting Manager

In line with Odeabank's sustainability vision, we support operational resource management through data-driven strategies.

By consolidating the energy consumption data from our Head Office and branches on a monthly basis, we have established a transparent reporting infrastructure.

We have designed our data collection and verification processes in accordance with independent assurance standards and assurance requirements, ensuring the highest level of reliability for our sustainability reporting.

We also analyze periodic fluctuations in consumption and operational challenges through real-time data monitoring. By conducting root cause analyses, we are able to implement corrective actions promptly and effectively. As we combine financial discipline with environmental responsibility, we continue to build a reliable data foundation that supports Odeabank's journey toward a low-carbon economy and green transition.

Data reliability and traceability form the foundation of our climate reporting.

EMISSIONS PERFORMANCE SUMMARY

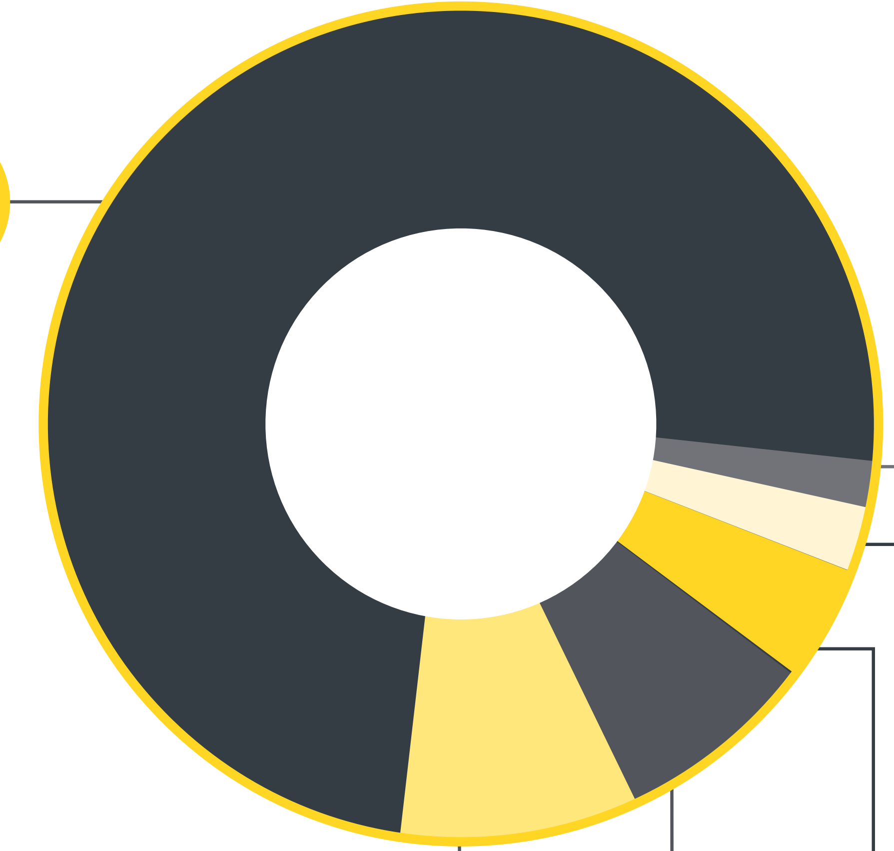
Scope 1	Scope 2 (Market-based)	Scope 2 (Location-based)	Scope 3
1,122.69 tCO_2e	0 tCO_2e	1,685.84 tCO_2e	10,512.79 tCO_2e
Direct greenhouse gas emissions	Calculated considering renewable electricity certificates	Calculated using grid electricity emission factors	Calculated excluding Category 15: Investments

LIMATE DATA MANAGEMENT AND OUR 2026 PRIORITIES

AREA	OUR APPROACH	AREA	OUR APPROACH	AREA	OUR APPROACH
DATA MONITORING	We monitor emissions and resource consumption data on a monthly basis.	REGULAR REPORTING	We regularly report key environmental performance indicators to ADQ.	DIGITAL MONITORING	We track our GHG emissions and ESG data through an online monitoring system.
EXTERNAL ASSURANCE	Our emissions data are subject to external assurance under both the TSRS and ADQ assurance processes.	SUPPORTING DOCUMENTATION	We focus on strengthening data traceability, methodological consistency, and supporting documentation.	SCOPE 3 DEVELOPMENT	We plan to calculate all relevant and materiality Scope 3 categories in 2026.
CDP READINESS	We plan to submit our first CDP Climate Change disclosure in 2026.	CLIMATE ROADMAP	We aim to develop a climate action plan under the UN Global Compact Climate Ambition Accelerator Programme.	FINANCED EMISSIONS	In line with our PCAF membership, we continue to strengthen the measurement and management of financed emissions.

You can access Odeabank's *TSRS Compliant Sustainability Report* here.

KEY SOURCES OF SCOPE 1 EMISSIONS



594.80 — 53%

COMPANY VEHICLES – GASOLINE

Highest-priority source for direct emissions monitoring.

13.44 — 1.2%

COMPANY VEHICLES – DIESEL*

Monitored as part of fleet emissions management.

20.34 — 1.8%

FIRE SUPPRESSION EQUIPMENT

Monitored as part of fugitive emissions management.

24.04 — 2.1%

DIESEL (GENERATORS)

Although representing a relatively small share, it continues to be monitored.

278.64 — 24.8%

REFRIGERANT GAS LEAKAGE

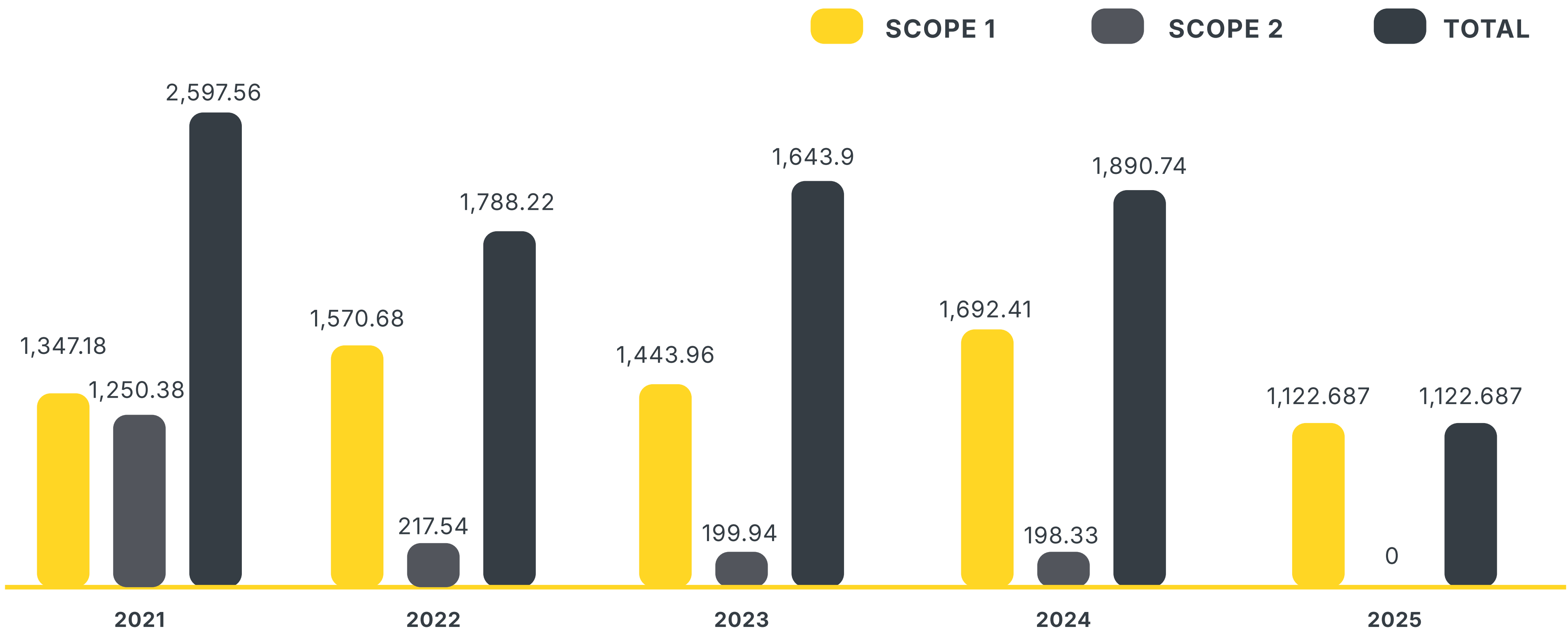
A key improvement area for maintenance, monitoring, and leak management.

191.43 — 17.1%

NATURAL GAS

Managed through energy efficiency measures and consumption monitoring.

ODEABANK TOTAL SCOPE 1 AND SCOPE 2 EMISSIONS (tCO_2e)



During the 2025 reporting period, our total Scope 1 and Scope 2 greenhouse gas emissions decreased by approximately 40% compared to the previous year. This improvement was driven by the use of more comprehensive and higher-quality activity data in our emissions calculations, the removal of diesel-powered company vehicles from our fleet, and the reduction of our market-based Scope 2 emissions to zero through the use of 100% I-REC-certified renewable electricity.

ODEATECH GREENHOUSE GAS EMİSSİONS (tCO_2e)

Scope 1	17.71 tCO_2e
Scope 2 (Location-based)	64.16 tCO_2e
Scope 2 (Market-based)	0 tCO_2e
Total (Scope 1 + Scope 2, Location-based)	81.87 tCO_2e
Total (Scope 1 + Scope 2, Market-based)	17.71 tCO_2e

** Odeatech's Scope 1 emissions arise from natural gas consumption and diesel used in generators. The Bank's vehicles are owned by Odeabank; therefore, the related emissions are reported under Odeabank.*

Further details on our emissions performance are available in the *"2025 Performance Indicators"* section.

VALUE CHAIN MANAGEMENT

At Odea Bank, we regard our value chain as a strategic area of management, enabling us to take a holistic approach to assessing the economic, social, and environmental impacts of our operations.

Capitals:

- Financial Capital
- Social and Relationship Capital
- Intellectual Capital
- Natural Capital
- Human Capital

Related Materiality Topics:

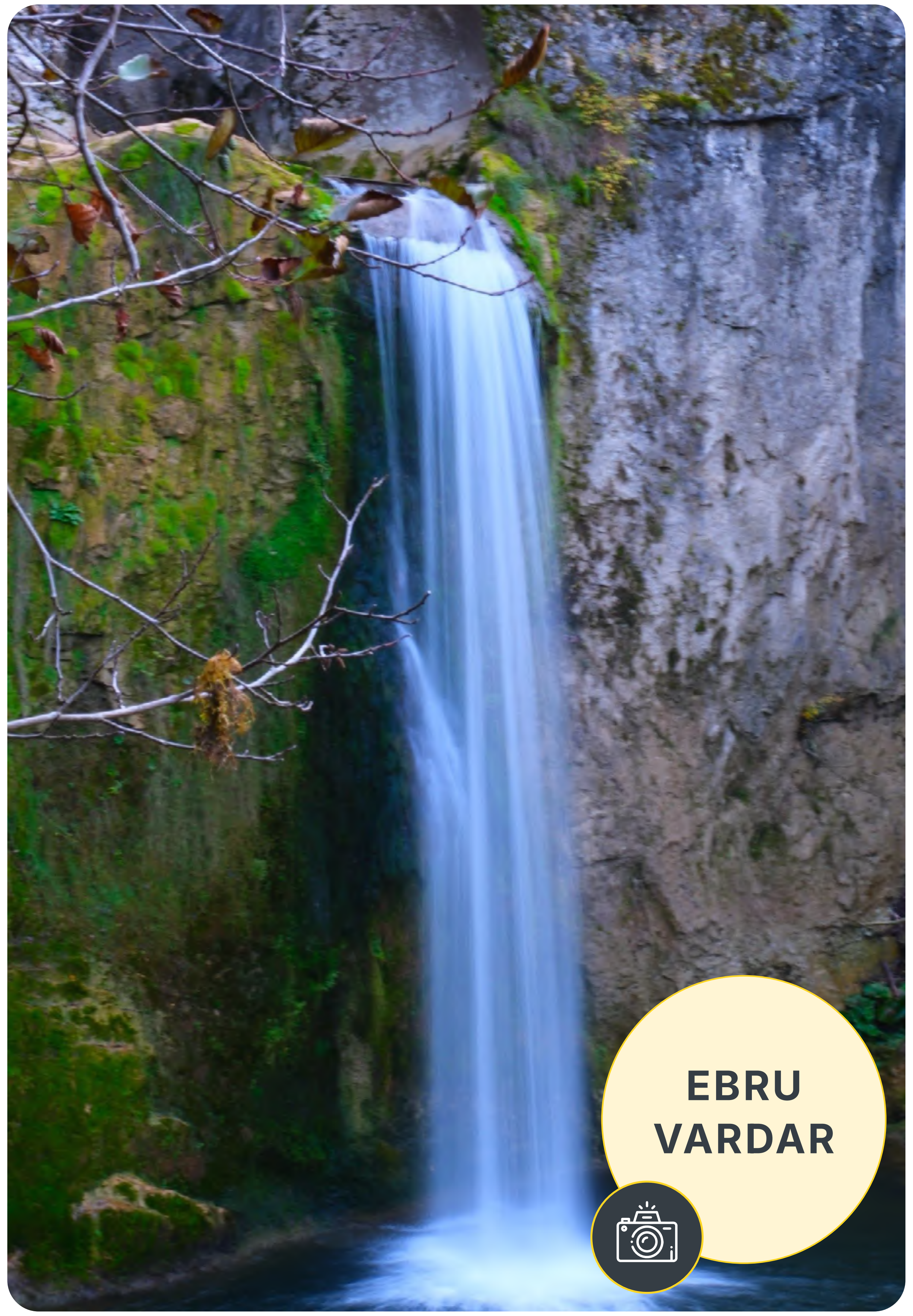
- Responsible Products and Services
- Environmental Impact
- Business Ethics
- Compliance and Anti-Corruption
- Risk Management

Beyond the direct impacts of our banking operations, we create value through our relationships with suppliers, customers, employees, business partners, shareholders, financial institutions, regulatory authorities, and society.

Our value chain approach encompasses access to financial resources, the procurement of operational goods and services, our core banking operations, product and service development, customer experience, responsible finance, and our broader socio-economic impacts. This framework enables us to evaluate our operations not only in terms of financial outcomes, but also through the lenses of ethical business conduct, risk management, information security, customer satisfaction, financial inclusion, environmental and social responsibility, and stakeholder trust.

Throughout our value chain, we aim to create long-term, inclusive, and sustainable value while upholding the principles of ethics, transparency, regulatory compliance, responsible finance, information security, and operational resilience across all of our business processes.

To learn more about the holistic value we create across our value chain through our corporate responsibility approach, please refer to the *"Our Value Creation Model"* section.



UPSTREAM

Provision of Capital and Financial Resources

Procurement of Operational Goods and Services

CORE BANKING OPERATIONS

Product and Service Development

Credit Allocation and Risk Management

Customer Acquisition and Channel Management

Payment Systems and Operations Management

Treasury and Fund Management

Human Resources and Corporate Governance

DOWNSTREAM

Social and Economic Impacts

Customer Impacts

SUPPLY CHAIN MANAGEMENT

We manage our procurement processes for goods and services in accordance with our _Code of Ethics and Conduct Policy_, _Sustainability Policy_, and relevant internal procedures. We adopt a competitive, transparent, and fair procurement approach, considering compliance with ethical principles, service quality, operational capability, regulatory compliance, information security, and sustainability criteria in our supplier selection process.

Procurement operations are coordinated by our Support Services and Banking Support Division, where both our suppliers and the goods and services they provide are subject to risk assessments. Accordingly, we view supply chain management not merely as the procurement of products and services, but as a strategic process that supports operational continuity, corporate reputation, environmental and social responsibility, and stakeholder trust.

SUPPLY CHAIN PERFORMANCE INDICATORS

	Total number of suppliers	Number of local suppliers	Local supplier ratio	Payment ratio to suppliers
2025	685	647	94%	93%
2024	732	701	96%	89%

We place great importance on promoting ethical, transparent, and responsible business practices throughout our supply chain. Through our Supplier Code of Conduct approach, we establish a common framework for the ethical, social, environmental, and governance principles we expect our business partners to uphold. This approach aims to strengthen our shared sense of responsibility within supplier relationships, manage compliance and reputational risks more effectively, and support the creation of sustainable value.

CORE PRINCIPLES EXPECTED FROM OUR SUPPLIERS

REGULATORY COMPLIANCE

Compliance with applicable laws, regulations, and industry standards

ETHICAL BUSINESS CONDUCT

Business integrity, prevention of conflicts of interest, and anti-bribery and anti-corruption practices

LABOUR AND SOCIAL STANDARDS

Fair labour practices, prevention of discrimination, and respect for human and employee rights

OCCUPATIONAL HEALTH AND SAFETY

Promotion of safe and healthy working conditions

ENVIRONMENTAL RESPONSIBILITY

Compliance with environmental legislation, responsible resource use, and efforts to reduce emissions

INFORMATION SECURITY AND PRIVACY

Protection of confidential information and compliance with data privacy requirements

We are currently developing our Responsible Procurement Policy, which aims to integrate our environmental, social, and ethical responsibilities into procurement processes in a more systematic manner while strengthening our supplier evaluation approach through sustainability criteria.

Looking ahead, our priority areas for development include increasing the visibility of environmental and social criteria within supplier selection, evaluation, and monitoring processes, improving the quality of supplier data, and adopting a more systematic approach to assessing sustainability risks across critical procurement categories.

Our Compliance Focus

As a precious metals intermediary operating in the Borsa İstanbul Precious Metals Market, we conduct our activities in accordance with the sector-specific regulations, international standards, and applicable rules and principles governing this market. In this context, we implement our Responsible Precious Metals Supply Chain Compliance Program and publicly disclose our approach through our *Responsible Supply Chain Compliance Report.*

Human-Centered Banking

EMPOWERING TALENT

We position our human capital as a key enabler of our sustainable growth, digital transformation, customer experience, operational agility, and social impact objectives.

7 AFFORDABLE AND CLEAN ENERGY
12 RESPONSIBLE CONSUMPTION AND PRODUCTION

Capitals:

- Intellectual Capital
- Human Capital

Related Materiality Topics:

- Talent Management

At Odeabank, we view our Human-Centered Banking approach as a holistic value creation framework that supports employee development, strengthens our inclusive corporate culture, prioritizes employee health and well-being, and enhances social value.

In 2025, we further strengthened our human-centered approach through initiatives focused on talent acquisition, learning and development, performance and career management, diversity and inclusion, employee experience, health and safety, social impact, and financial literacy. We implemented practices that recognize employee contributions, reinforce a high-performance culture, address the expectations of different generations, and create positive societal impact.

Total Odeabank + Odeatech employees	1,393
Odeabank employees	1,211
Average employee age	36
Total employee turnover rate	15%
Voluntary turnover rate	11%
New hires	375
Promotions	204
Total training hours*	48,087
Average training hours per employee	39.7
Occupational Health and Safety (OHS) training participants	1,571

** Data includes Odeatech employees.*

At Odeabank, we aim to create a dynamic working environment that enables our employees to meet the evolving needs of the banking sector by strengthening competencies, supporting career development, and fostering a high-performance culture.

In 2025, Odeabank employed 1,211 people, while our consolidated workforce, including Odeatech, reached 1,393 employees. Of our Odeabank workforce, 710 were women and 501 were men, corresponding to 59% female and 41% male representation. All employees were employed on a full-time basis in white-collar positions.

We monitor our workforce profile across dimensions including gender, age, tenure, job level, disability status, functional area, and management level. These insights inform our talent acquisition, career planning, training needs analysis, and organizational capacity management processes. In 2025, our average employee age was 36. The fact that 777 employees had between 0–5 years of tenure reflects our dynamic talent acquisition strategy and organizational growth, while 250 employees with 10 years or more of service contribute to preserving institutional knowledge and facilitating the transfer of experience.

Employee engagement and retention remain key indicators of our human capital management performance. In 2025, our total employee turnover rate was 14.8%, while our voluntary turnover rate declined to 10.5%. Compared to 2024, when total turnover stood at 29% and voluntary turnover at 21%, this significant improvement highlights the value of our integrated approach to employee experience, career development, compensation, benefits, and engagement initiatives.

Throughout 2025, we conducted our recruitment operations in line with the Bank's strategic priorities, focusing on attracting candidates with strong learning agility, alignment with our corporate values, and the ability to adapt to evolving ways of working. Of the 399 positions opened during the year, 391 were successfully filled, resulting in an approximately 98% position fill rate. A total of 375 new employees joined the Bank, with women accounting for 50.7% and men 49.3% of all new hires.

During the year, 801 candidates participated in our AI-supported interview process. Through this initiative, we aimed to enhance the candidate experience, accelerate recruitment processes, and improve the efficiency and consistency of candidate assessments. We also continued to conduct candidate experience surveys to gather feedback and further improve our recruitment practices.

Our performance management framework is designed to strengthen our high-performance culture, recognize employee contributions, monitor role-based business outcomes, and support individual development. The framework consists of goal scorecards, sales scorecards, core and leadership competencies, and technical competencies. This integrated structure ensures that individual performance remains closely aligned with the Bank's strategic priorities.

In 2025, 204 employees were promoted, including 114 women and 90 men, with women representing **55.9%** of all promotions. In addition, 55 employees transferred to different functions based on internal job postings, applications, and manager and employee requests. These internal mobility practices support career development while preserving institutional knowledge and facilitating the transfer of expertise across departments.

Building on the foundations established in 2024, we further advanced our data-driven HR practices in 2025. Through initiatives in performance management, agile transformation, process improvement, workforce planning, compensation management, and HR analytics, we enhanced the measurability, transparency, and decision-support capabilities of our human resources processes.

We structure our talent management approach around talent acquisition, learning and development, leadership, performance and career management, internal mobility, data-driven HR practices, and an agile work culture.

We continued implementing the OKR (Objectives and Key Results) methodology within our Investor Relations and Information Security departments, promoting greater agility, transparency, and focus in goal-setting and performance monitoring. Through the SenkrOn platform, we enabled a more integrated and traceable management of performance, objectives, and feedback processes. In parallel, our HR analytics initiatives increased data visibility across key areas such as employee engagement, talent management, workforce planning, employee demographics, performance, and workforce productivity.

INVESTING IN THE SKILLS OF THE FUTURE

At Odeabank, we prioritize equipping both our employees and young talent with the competencies required for the future of banking. To achieve this, we invest in our human capital through graduate talent programs, learning and development journeys, leadership development, and training focused on sustainability, artificial intelligence, and data analytics.

In 2025, our Nova Internship Program and OdeaStellar Young Talent Program introduced emerging talent to the financial services industry, while our employee development programs strengthened technical, digital, leadership, and personal competencies. Through the Nova Internship Program, 29 interns gained first-hand experience of the Bank and the banking sector.

Meanwhile, 53 young professionals joined the Bank through the OdeaStellar Young Talent Program. Lasting approximately two months, the program delivered a comprehensive development journey consisting of 34 technical and personal development training modules.

Through our sustainability, artificial intelligence, and data analytics training programs, we support our employees in adapting to evolving ways of working while fostering digital capabilities, data-driven decision-making skills, and sustainability awareness across the organization.

Detailed annual information on employee development, training hours, and other social performance indicators can be found in the *"Social Performance Indicators"* section of this report.

Employee Development Programs	Scope / Content
OdeaStellar Development Program	Approximately two-month program featuring 34 technical and personal development training modules
Artificial Intelligence Development Program	AI Development Program launch event and AI Literacy training
Data Analytics Development Program	Data Literacy, Data Driven Decision Making, and Basic to Advanced Excel Training
Leadership Development Program	Four-month program consisting of eight modules for newly appointed managers
Commercial Banking Portfolio Development Program	Seven technical and personal development training modules for Relationship Managers working in branches
Retail Banking Investment Specialist Development Program	Training delivered under two specialized modules
Nova Internship Program	Training through the E-Odea platform covering effective communication, technology literacy, basic Excel, artificial intelligence, and related topics

Sustainability Training Performance	2025
Employees receiving basic sustainability training	1,284
Employees receiving advanced sustainability training	1,269
Sustainability training hours	2,803
Participants in sustainability training provided to commercial customers	73
Participants in sustainability training provided to Commercial Banking branch employees	29
Employees participating in external sustainability training programs	5

Digital Skills and Artificial Intelligence Training Performance	2025
Artificial Intelligence Development Program participation rate	51%
Number of AI Literacy groups	12
AI Literacy participants	300
Employees participating in Data Science / Data Analytics training	302
Total training hours on AI and data	6,784
Training satisfaction score	84

DIVERSITY, EQUITY AND INCLUSION

We uphold the principle of equal opportunity in our recruitment, promotion, compensation, benefits, and learning and development processes, while prioritizing merit and competence.

Capitals:

- Social and Relationship Capital
- Human Capital

Related Materiality Topics:

- Diversity, Equity and Inclusion

57%
female workforce

51.5%
women in management positions

59.8%
women in revenue-generating functions

60.3%
women managers in revenue-generating functions

35.5%
women in STEM role

0
Discrimination incident

While maintaining strong female representation in management positions, we consider increasing women's representation in senior leadership, STEM disciplines and other critical leadership roles among our key priorities for future development.

Our Global Commitment to Women's Empowerment

We are a signatory to the Women's Empowerment Principles (WEPs), developed by UN Women and the UN Global Compact.

- Equal opportunities and an inclusive working environment
- Support for women's leadership
- Equal access to learning and development opportunities
- Promotion of gender equality throughout the value chain and wider society

In 2025, women represented 59% of our workforce, while men accounted for 41%. Of our 266 employees in managerial positions, 137 were women and 129 were men, resulting in a 51.5% representation of women in management. Women represented 59.8% of employees in revenue-generating functions, while 60.3% of managers in these functions were women.

While maintaining strong female representation in management positions, increasing the representation of women in senior management, C-level and STEM roles remains one of our key development priorities. In 2025, women represented 35.5% of employees in STEM positions. Accordingly, through our recruitment, development, career planning and leadership programs, we aim to strengthen the representation of women in technology, data and innovation-focused roles. In 2025, 35 employees with disabilities were employed across the Bank, including 10 women and 25 men, corresponding to an employee disability representation rate of approximately 2.9%. In line with our commitment to providing an accessible and inclusive workplace, we continue to implement practices that support the equal participation of employees with disabilities in working life.

We maintain a zero-tolerance approach to discrimination, harassment and workplace bullying, while providing secure channels through which employees can raise concerns and provide feedback. No cases of discrimination were identified within the Bank during 2025. A total of **1,455** employees participated in awareness training on diversity, discrimination and harassment. Strengthening the visibility of our existing reporting and grievance mechanisms to ensure employees can safely communicate feedback and concerns through accessible and structured channels remains an important area for further development.

Our compensation practices are managed in line with role responsibilities, performance and market conditions, while supporting fairness, competitiveness and equal opportunity.

To further strengthen our inclusive corporate culture through a more systematic and holistic framework, we introduced our Diversity, Equity and Inclusion Policy in 2026.

Diversity, Equity and Inclusion Performance	2023	2024	2025
Women in management positions (%)	51	52	52
Women in revenue-generating functions (%)	60	51	60
Women managers in revenue-generating functions (%)	50	56	60
Women in STEM roles (%)	40	42	36
Employees with disabilities	23	35	35
Confirmed discrimination cases	0	0	0
Participants in diversity, discrimination and harassment awareness training	-	-	1,455

**No diversity, discrimination and harassment awareness training was conducted in 2023 or 2024.*

Respect for Human Rights

Respect for human rights is one of the cornerstones of our sustainable and responsible banking approach. We promote equal opportunity, non-discrimination, safe working conditions, employee well-being, accessibility and ethical business conduct for our employees, customers, suppliers and all stakeholders affected by our operations. While our human rights approach is supported through our policies and practices, we are committed to continuously strengthening our institutional capacity and implementation capabilities in this area.

In this context, in 2026 we joined the UN Global Compact Human Rights Accelerator Programme and initiated a gap assessment to further enhance our human rights management approach in line with international best practices. Through the program, we aim to strengthen the systematic assessment of human rights risks and impacts, enhance relevant processes and governance mechanisms, and embed a stronger human rights culture throughout the organization.

EMPLOYEE EXPERIENCE, HEALTH AND WELL-BEING

We position employee experience not only as part of our human resources processes, but also as a holistic management approach that strengthens our corporate culture, enhances employee engagement, and supports our long-term value creation.

3 GOOD HEALTH AND WELL-BEING
8 DECENT WORK AND ECONOMIC GROWTH

Capitals:

- Human Capital

Related Materiality Topics:

- Employee Health, Well-being and Safety

SUPPORTING THE EMPLOYEE EXPERIENCE

Hybrid working practices

Home office support

Digital workplace tools

Flexible working approach

At Odeabank, we view the employee experience as a strategic human capital management area that brings together employee engagement, corporate culture, inclusion, health, safety and well-being. Throughout 2025, we continued to enhance our employee experience practices to strengthen employees' connection with the Bank's strategy, respond to the evolving expectations of different generations, foster a workplace built on trust and inclusion, and support employee well-being. Accordingly, we positioned the employee experience not merely as a component of human resources processes, but as a holistic management approach that strengthens our corporate culture, enhances employee engagement, and supports our long-term value creation.

Through our Odealist culture—one of the defining elements of our corporate identity—we encouraged our employees to build a strong connection not only with their roles and responsibilities but also with the Bank's values, human-centered service approach, ethical principles and sustainability objectives. During 2025, we focused on bringing employees together around common goals, strengthening a culture of collaboration and accountability, and embedding our corporate values more deeply into everyday ways of working. To support this objective, we reinforced employee relations and internal communications through regular updates, employee meetings, leadership communications and initiatives that nurture our corporate culture.

We regard employee opinions, suggestions and feedback as essential sources of insight for continuously improving the employee experience. Through multiple communication channels, we sought to better understand employees' expectations and needs, using the feedback received as a key input for our continuous improvement efforts. In doing so, we aimed to foster a working environment built on open communication, constructive feedback and active participation.

To support our employees' quality of life, engagement and overall well-being, we provide a comprehensive range of employee benefits and support programs. These include private health insurance, life insurance, transportation and meal allowances, home office support, and education and professional certification assistance. Through these initiatives, we support both our employees' professional development and their work-life balance, creating an employee experience that contributes to long-term career development.

We also continue to stand by our employees during significant milestones in their lives. By celebrating important occasions such as marriage and the birth of a child, we strengthen employees' sense of belonging, while our parental support practices help address their evolving needs throughout different stages of life. Through this approach, we continue to foster an inclusive workplace where employees feel valued, supported and an integral part of the Odeabank culture.

36
EMPLOYEES TAKING MATERNITY / PARENTAL LEAVE

100%
RETURN-TO-WORK RATE

24
EMPLOYEES REMAINING WITH THE BANK FOR AT LEAST 12 MONTHS AFTER RETURNING FROM LEAVE

HEALTH, SAFETY AND WELL-BEING

We consider employee health, well-being and safety to be a strategic priority for protecting our human capital and strengthening our sustainable working environment. Our approach extends beyond regulatory compliance and accident prevention to encompass physical safety, psychological resilience, social well-being, emergency preparedness and business continuity within a holistic management framework.

We view occupational health and safety (OHS) not merely as a legal obligation but as an integral component of our corporate culture, ensuring that all employees operate in a safe and healthy working environment.

Our OHS performance is monitored regularly through dedicated boards and committee structures. The senior management responsible for occupational health and safety serves as the Employer Representative and reports directly to the CEO. To safeguard our employees and ensure uninterrupted service delivery, we continue to strengthen our business continuity and crisis management capabilities.

Our institutional resilience is supported through alternative working arrangements, emergency response plans, crisis management departments and backup operational infrastructure designed to maintain critical operations during disruptions. We also review our preparedness through regular emergency drills and communication tests while promoting emergency awareness across the organization.

OHS Performance of Contractors

We regard the health and safety of contractor employees as an integral part of our occupational health and safety approach. Accordingly, occupational health and safety criteria are incorporated into our contractor selection processes. Before work begins, contractors are required to provide evidence of employee OHS training, medical examinations and role-specific documentation. For occupations requiring specialized equipment or qualifications, the relevant training and competency certificates must also be submitted. We monitor contractors' compliance with the Bank's occupational health and safety requirements throughout their operations and assess on-site practices through a preventive risk management approach. As part of this process, we regularly monitor contractor OHS performance by tracking key indicators such as occupational accidents, injuries, lost-time incidents and work-related fatalities.

No fatalities, work-related deaths, recordable occupational accidents, high-severity injuries or lost-time incidents involving contractor employees occurred during 2025. This performance demonstrates the effectiveness of our contractor pre-qualification procedures, mandatory training and health documentation requirements, and ongoing OHS monitoring practices in maintaining a safe working environment.

HSE Performance Indicator	2025
Occupational Health and Safety training hours	2,067
OHS training participants	1,571
OHS inspections	38
Emergency drills	37
Emergency drill participation rate	70%
Occupational diseases	0
Total lost workdays	0

PSYCHOLOGICAL AND SOCIAL WELL-BEING

In 2025, we implemented a variety of initiatives to support our employees' psychological and social well-being, strengthen internal engagement, and increase opportunities for social interaction outside the workplace.

We believe that standing by our employees during the significant milestones in their lives is an important part of the employee experience. Accordingly, we continued to celebrate and support employees who got married or welcomed a new child by sharing in their happiness as a Bank and recognizing these special occasions. Throughout the year, we organized a range of hobby, sports, and social engagement activities designed to appeal to our employees' diverse interests.

In 2025, we held a total of 12 hobby and sports events. These included rowing events, a ceramics workshop, culinary workshops at MSA, a candle-making workshop, a lampshade-making workshop, an online escape game, cookie and cupcake workshops, a chocolate-making workshop, an online sculpture workshop, and a quiz competition. Through these activities, we aimed to encourage social interaction, foster creativity, and strengthen collaboration and communication across teams.

As part of our sports initiatives, which support not only employees' physical well-being but also their social connectedness, we participated in the Runtalya Marathon, the Istanbul Half Marathon, the Istanbul Marathon, the Caddebostan running event, and a tennis tournament. These operations helped reinforce team spirit, boost motivation, and create shared experiences that contribute to a positive and collaborative work environment.

To strengthen our culture of volunteerism and solidarity, we organized a visit to an animal shelter in 2025. In addition, as part of the April 23 National Sovereignty and Children's Day celebrations, we made a donation to KAÇUV to support children and continued to integrate our commitment to social impact with the employee experience.

SOCIAL IMPACT AND COMMUNITY INVESTMENT

We position our social investments not only as donations, sponsorships, or communication activities, but as a key component of our long-term value creation approach.

Capitals:
- Social and Relationship Capital
- Human Capital
- Intellectual Capital

Related Materiality Topics:
- Community Investment Programs
- Financial and Digital Literacy
- Diversity, Equity and Inclusion

At Odeabank, we view social impact as extending beyond our financial services, with the objective of contributing to the development of a more equitable, inclusive, accessible, and financially empowered society. We position our community investments not merely as donations, sponsorships, or communication operations, but as an integral component of our long-term value creation approach.

In 2025, we continued our social impact initiatives with a focus on climate action, equality, culture and the arts, accessibility, the empowerment of women and girls, quality education, and financial literacy.

PROMOTING EQUALITY AND EDUCATION

Equality, the empowerment of women and girls, and quality education remain among the key priorities of our corporate social investment strategy. We believe that introducing children to the values of equality from an early age, improving girls' access to education, and supporting young women throughout their career journeys are essential components of inclusive and sustainable development.

In 2025, we continued our *Eşit Masallar (Fair Tales)* initiative, which was developed based on the insight that gender stereotypes are often transmitted through traditional fairy tales. Through this project, we reinterpret classic stories from an equality perspective to help children develop an early understanding of equality and inclusion.

To date, five Eşit Masallar (Fair Tales) books have been published, with a total print run of 1.3 million copies. The project has directly reached more than 200,000 children, while its total audience has exceeded 3.56 million people. The digital editions have been viewed more than 200,000 times, and the theater production inspired by the stories has reached more than 100,000 children and their families through performances across Türkiye. In 2026, we will publicly share the results of the social impact assessment conducted for the Eşit Masallar (Fair Tales) initiative.

We also continued our partnership with the Koruncuk Foundation to support girls' access to education. As part of the International Day of the Girl Child on 11 October, we supported the Foundation's "Does Success Matter?" campaign by covering one month's educational expenses for 107 girls. On the same occasion, we hosted a special program on Odea Radio together with the Koruncuk Foundation to raise awareness of the importance of supporting girls' education and aspirations.

SOCIAL IMPACT AT A GLANCE – EŞIT MASALLAR (FAIR TALES)

- **1.3 million books printed**
- **More than 200,000 children reached directly**
- **Total audience of 3.56 million**
- **More than 100,000 children and family members reached through the theater production**

EMPOWERING WOMEN AND GIRLS

We consider women's equal participation in economic and social life to be fundamental to sustainable development. Accordingly, we implement initiatives that support women's participation in the workforce, leadership development, and economic empowerment, while embedding gender equality into both our internal practices and our community investment programs. As a signatory to the WEPs, developed by the UN Global Compact and UN Women, we continue to advance initiatives that contribute to women's empowerment.

Through the One Million Women Mentors program, led by TurkishWIN, our volunteer employees provided mentoring support to high school students, university students, and recent female graduates.

Our commitment to gender equality extends beyond the workplace and community projects to include family roles, caregiving responsibilities, democratic parenting, and children's well-being. In collaboration with Equality Matters (Eşitliğe Değer), we organized seminars on equitable parenting for our employees and drives awareness activities during Mother's Day and Father's Day focusing on parenting, caregiving responsibilities, and equality within the family.

To mark International Women's Day on 8 March, we supported the Foundation for the Support of Women's Work (KEDV) and its initiatives aimed at strengthening the economic participation of women affected by the earthquake. Through this support, we sought to enhance women's economic resilience and active participation in post-disaster recovery.

OUR GLOBAL COMMITMENT TO WOMEN'S EMPOWERMENT

- **Signatory to the WEPs**
- **Member of the One Million Women Mentors Program**
- **Supporting girls' access to education**
- **Promoting awareness of equitable parenting**
- **Supporting initiatives that strengthen women's economic empowerment**

ACCESSIBILITY AND INCLUSIVE BANKING

We believe that everyone should have equal access to financial services and information. Accordingly, we approach accessibility not only from a physical perspective but also through digital experience, communication, and access to information.

In 2025, through our partnership with Accessible Everything (Erişilebilir Her Şey), we assessed the accessibility performance of our digital channels and customer touchpoints. We also launched the Conversations on Accessibility content series to raise awareness of accessibility-related issues.

OUR ACCESSIBILITY APPROACH

- **Physical accessibility:** Accessible branch and ATMs
- **Digital accessibility:** Website, Internet Banking, and Mobile App Enhancements
- **Inclusive communication:** Accessibility Assessment of Communication Materials
- **Awareness:** Eight-episode Conversations on Accessibility series
- Further information on our accessible banking practices is available in the ***"Accessible and Inclusive Banking"*** section.

FINANCIAL LITERACY AND ACCESS TO KNOWLEDGE

In 2025, we further strengthened our financial literacy efforts by expanding our engagement with young people. As part of this initiative, we organized the ALGO Trade 101 event, where university students were introduced to the fundamental principles of algorithmic trading. Participants also took part in a hands on workshop that enabled them to reinforce their theoretical knowledge through practical application.

Throughout the year, we engaged with students through a variety of events and platforms, including Anbean Finance and Investment School, the Interaction and Development Camp, YTU KVK Fest, Hacettepe HEK Investing, Marmara University CMY, Bilkent University Data Days, and the 18th BTZ Event at Istanbul Technical University (ITU). Through these initiatives, we supported young people's access to knowledge in finance, investment, technology, and career development, while further strengthening the Bank's engagement with emerging talent.

We regard financial literacy as an important area of social impact that enables individuals to participate more confidently in economic life.

Through Akademi'O, our Investment Focused Agenda and The Voice of Investment programs on Odea Radio, and O'mag, O'blog, our investment-focused publications, and the Investment-Focused Podcast, we promote access to information on investing, savings, financial planning, and economic developments.

During the third season of the Investment-Focused Podcast in 2025, we published 14 episodes, bringing a broad range of investment topics to wider audiences. We continued expanding our financial literacy content across various digital platforms.

OUR FINANCIAL LITERACY ECOSYSTEM

- **Akademi'O**
- **Odea Radio**
- **Investment-Focused Podcast**
- **O'mag**
- **O'blog**
- **Press Releases**

Further information regarding Akademi'O and our financial literacy initiatives can be found in the *"Financial Empowerment"* section.

CREATING INCLUSIVE IMPACT THROUGH ARTS AND CULTURE

We believe that arts and culture have the power to bring communities together. Through O'art and our cultural sponsorships, we support initiatives that contribute to artistic production and cultural engagement.

Since 2015, *O'art* has provided a platform for contemporary artists, supporting new artistic production while increasing the visibility of artists. By extending O'art exhibitions to digital platforms, we also enable broader public access beyond physical exhibition spaces.

In 2025, under the O'art platform, we produced content featuring insights from Art Basel Hong Kong, the Istanbul Biennial, and the Abu Dhabi Art Fair, as well as selected domestic and international exhibitions, curated by Begüm Güney.

In line with our commitment to gender equality, we continue to support women's visibility in the cultural sector. In 2025, we proudly served for the fifth consecutive year as the theme sponsor of the **"There's a Woman Behind This"** program at the İKSV Theater Festival, supporting the visibility, creativity, and contributions of women in theater.

OUR ARTS & CULTURE FOCUS

- **Supporting contemporary art through O'art**
- **Expanding cultural access through digital exhibitions**
- **Theme sponsorship of the İKSV Theater Festival's "There's a Woman Behind This" program**
- **Eşit Masallar (Fair Tales) Theater Production**
- **Increasing the visibility of women's contributions to arts and culture**

EMPLOYEE VOLUNTEERING AND INTERNAL ENGAGEMENT

We believe that social impact should also be embedded within our organizational culture. Accordingly, we organize employee volunteering, awareness, and educational initiatives that strengthen environmental and social responsibility across the Bank.

Through our collaboration with Mutlu Patiler, we supported the care and treatment of stray animals. To celebrate our anniversary, we also partnered with the Pastamızı Çocuklar Üflesin initiative, providing meaningful social support to children attending village schools in Ağrı, Van, and Iğdır.

We consider employee volunteering and mentoring to be key drivers of our internal social impact culture. Going forward, we aim to monitor our volunteering initiatives more systematically by tracking the number of employee volunteers, volunteering hours, beneficiaries reached, and employee feedback.

MEASURING SOCIAL IMPACT

We are committed to making the impact of our community investments more visible, comparable, and outcome-oriented. Accordingly, we intend to evaluate our social initiatives not only through activity counts or reach metrics but also by considering beneficiary feedback, behavioural change, program completion rates, accessibility improvements, volunteering contributions, and alignment with the Sustainable Development Goals (SDGs).

In the coming years, we aim to further strengthen our social impact measurement framework by systematically assessing project outcomes, beneficiary impact, and long-term societal value.

Our 2026 Social Impact Priorities

- Develop a comprehensive social impact measurement methodology.
- Establish systematic monitoring of volunteering and mentoring indicators.
- Scale accessibility initiatives.
- Strengthen programs supporting women's and girl's empowerment.
- Enhance human rights governance practices.
- Improve reporting on contributions to the Sustainable Development Goals (SDGs).

We consider employee volunteering and mentoring to be key drivers of our internal social impact culture.

Performance and Areas for Progress

2025 PERFORMANCE INDICATORS

ENVIRONMENTAL PERFORMANCE INDICATORS

Odeabank Energy Consumption	2021	2022	2023	2024	2025
Natural Gas Consumption (MWh)	2,463	2,851	2,693	3,000	945
Electricity Consumption Excluding Renewable Electricity (I-REC) (kWh)	2,848,252	495,540	455,443	451,780	0
Total Energy Consumption (kWh)*	6,123,328	4,807,383	4,513,692	4,418,561	3,884,430
Renewable Energy (I-REC) (kWh)	3,275,076	4,311,843	4,058,249	3,966,781	3,884,430
Renewable Electricity Ratio (%)	53,5	89,7	89,9	89.8	100
Energy Intensity (kWh/Employee)	5,512	4,331	3,515	3,974	3,208

In 2025, 100% of electricity consumption was matched with I-REC certificates, resulting in zero non-I-REC electricity consumption. Total electricity consumption decreased compared to 2021, while renewable electricity usage reached a level covering all electricity consumption.

Odeatech Energy Consumption	2024	2025
Natural Gas (MWh)***	62.64	95.39
Diesel (Generator) (Liters)	3,300	1,928
Electricity (kWh)	23,836	147,841

*As Odeatech commenced operations in April 2024, the 2024 consumption data covers an eight-month period. In 2025, the inclusion of a full 12 months of consumption data resulted in an increase in the reported figures.
**Odeatech's operational area increased from 763 m² to 1,099 m² in March 2025, and further to 1,526 m² in October 2025. This expansion in floor area contributed to the increase in consumption figures.
***Odeatech's natural gas consumption is tracked in m³ and has been converted into MWh for presentation in the table to ensure comparability.

Emissions (tCO_2e)	2021	2022	2023	2024	2025
Scope 1	1,347	1,570	1,444	1,692	1,122
Scope 2 (Location-based)	2,926	2,735	2,160	1,939.84	1,685.84
Scope 2 (Market-based)*	1,250	217	200	198	0
Total (Scope 1 + Scope 2 Location-based)	4,273	4,305	3,604	3,632	2,808
Total (Scope 1 + Scope 2 Market-based)	2,597	1,767	1,644	1,890	1,122
Scope 3	524	608	1,013	712	10,512.79
Total (Scope 1 + Scope 2 + Scope 3)	3,121	2,395	2,657	2,603	11,635.48

*In 2025, I-REC certificates covered 100% of electricity consumption. Accordingly, Scope 2 emissions calculated using the market-based method were zero (0). Scope 2 emissions were also calculated and reported using the location-based method based on the relevant grid emission factors. I-REC certificates were allocated to the reporting period's electricity consumption and retired within the relevant registry systems.

PRIORITY IMPACT AREAS IN SCOPE 3 EMISSIONS

Scope 3 Category	2025 tCO_2e	Share of Scope 3*	Management Perspective
3.1 Purchased Goods and Services	4,639.15	44.1%	A priority area in terms of supplier data quality and procurement processes.
3.2 Capital Goods	2,184.30	20.8%	Reflects the environmental impact of investment and procurement decisions.
3.3 Fuel- and Energy-Related Activities (Not Included in Scope 1 or Scope 2)	720.10	6.9%	Complements the indirect impact of energy consumption.
3.4 Upstream Transportation and Distribution	2,379.77	22.6%	Important for monitoring logistics and shipment processes.
3.5 Waste*	0.10	0.0%	Although emissions from waste are limited, they continue to be monitored.
3.6 Business Travel	96.14	0.9%	Linked to travel policies and digital meeting practices.
3.7 Employee Commuting	493.20	4.7%	Monitored in relation to employee mobility and commuting patterns.
3.12 End-of-Life of Sold Products	0.02	0.0%	Monitored within the product life cycle approach.
Total	10,512.79	100%	The overall Scope 3 emissions profile highlights the priority management areas across supply chain, procurement and logistics processes.

**During the 2025 reporting period, Scope 3 emissions were calculated using more detailed and verified activity data. Accordingly, emissions from Category 2 (Capital Goods), Category 4 (Upstream Transportation and Distribution), and Category 12 (End-of-Life Treatment of Sold Products) were included in the reporting boundary for the first time. In addition, the calculation methodologies for Categories 1, 5, 6, and 7 were expanded to cover all relevant operations. The increase in Scope 3 emissions primarily reflects the expanded methodological scope and is a natural outcome of improved reporting maturity. We aim to expand our Scope 3 inventory, including the development of PCAF-aligned financed emissions calculations for priority lending portfolios, while continuing to strengthen data quality, portfolio coverage and methodology.*

Scope 3 Emissions (tCO_2e)*	2021	2022	2023	2024	2025*
Category 1 – Purchased Goods and Services	0,32	34,85	280,64	52,66	4.639,15
Category 2 – Capital Goods	-	-	-	-	2.184,30
Category 3 – Fuel- and Energy-Related Activities	516,93	511,97	501,02	515,80	720,10
Category 4 – Upstream Transportation and Distribution	-	-	-	-	2.379,77
Category 5 – Waste Generated in Operations	7,23	5,72	77,06	9,35	0,10
Category 6 – Business Travel	–	33,50	131,59	112,48	96,14
Category 7 – Employee Commuting	–	22,65	22,74	22,25	493,20
Category 12 – End of Life of Sold Products	-	-	-	-	0,02
Total	524,48	608,69	1.013,05	712,55	10.512,79

**In 2025, Purchased Goods and Services, Upstream Transportation and Distribution, and Capital Goods were the most significant contributors to Scope 3 emissions. This demonstrates improved visibility of value chain-related emissions.*

Odeatech Greenhouse Gas Emissions (tCO_2e)*	2024**	2025***
Scope 1	12,03	17,71
Scope 2 (Location-based)**	1,31	64,16
Scope 2 (Market-based)	1,31	0
Total Scope 1 + Scope 2 (Location-based)	13,34	81,87
Total Scope 1 + Scope 2 (Market-based)	13,34	17,71

*As Odeatech was established in 2024, emissions data is not available for previous years.
**As Odeatech commenced operations in April 2024, the 2024 emissions data covers an eight-month period. The inclusion of a full 12 months of data in 2025 contributed to the increase in the reported figures.
***Odeatech's operational area increased from 763 m² to 1,099 m² in March 2025 and to 1,526 m² in October 2025. This expansion in floor area contributed to the increase in emissions and consumption.

Water Management (m³)*	2021	2022	2023	2024	2025
Municipal Water Use	11.550	8.791	12.736	12.974	12.820
Average Water Consumption per Employee (m³/employee)	10,4	7,9	9,9	11,7	10,6

*Municipal water use in 2025 remained broadly in line with 2024. Water consumption trends should be assessed together with operational footprint, workforce size, and operational intensity.
The total number of employees can be obtained from the "Employees by Gender" table on the following page.

Non-Hazardous Waste (kg)	2021	2022	2023	2024	2025
Municipal Waste**	12.000	8.281	12.450	9.972	107.543
Paper and Cardboard***	1.059	1.342	4.913	3.734	81.194
Plastic Waste*	-	-	369	342	432
Metal Waste*	-	-	300	128	60
Total Non-Hazardous Waste	13.059	9.623	18.032	14.178	189.229

*Data for plastic and metal waste is unavailable for 2021 and 2022.
**In 2025, the methodology for municipal waste calculations was expanded to include employee headcount and working time. The increase is therefore primarily attributable to this methodological change.
***The increase in paper and cardboard waste resulted from the destruction of archived records retained for 10 years.

Hazardous Waste (kg)	2021	2022	2023	2024	2025
Batteries*	-	540	288	4.656	4.452
Toner Cartridges	8.330	6.047	1.179	201	4
Medical Waste	60	50	50	20	15
Total Hazardous Waste	8.390	6.637	1.517	4.877	4.471

*The increase in 2024 resulted from the scheduled five-year replacement of batteries used in UPS (Uninterruptible Power Supply) systems.

Compliance with Environmental Regulations	Unit	2024	2025
Administrative Fines	TRY	0	0
Number of Sanctions Imposed	Number	0	0

SOCIAL PERFORMANCE INDICATORS

Employee Satisfaction and Engagement	2023*
Number of Employees Participating – Satisfaction	1,090
Employee Participation Rate – Satisfaction	85%
Weighted Satisfaction Score	73
Number of Employees Participating – Engagement	1,090
Employee Participation Rate – Engagement	85%
Weighted Engagement Score	56

**No employee satisfaction or engagement surveys were conducted in 2024 or 2025.*

Breakdown of Employees by Location and Gender	2021			2022			2023			2024			2025		
	Female	Male	Total	Female	Male	Total	Female	Male	Total	Female	Male	Total	Female	Male	Total
Head Office	309	297	606	339	314	653	451	374	825	445	369	814	537	454	991
Branch	326	179	505	298	159	457	298	161	459	256	143	399	257	145	402
Total	635	476	1,111	637	473	1,110	749	535	1,284	701	512	1,213	794	599	1,393
Total (%)	57	43	100	57	43	100	58	42	100	58	42	100	57	43	100

**As of 2024, the data cover both Odeabank and Odeatech*

Total Number of Employees with Disabilities	2021	2022	2023	2024	2025
Female	9	9	8	12	10
Male	17	15	15	23	25
Total	26	24	24	35	35

Total Workforce by Age Group	2021			2022			2023			2024			2025		
	Female	Male	Total	Female	Male	Total	Female	Male	Total	Female	Male	Total	Female	Male	Total
Under 30	116	67	183	129	82	211	201	138	339	168	108	276	203	139	342
30–50	502	373	875	482	356	838	526	363	889	453	316	769	487	333	820
Over 50	17	36	53	26	35	61	22	34	56	30	37	67	20	29	49

Odeatech Workforce by Age Group*	2024			2025		
	Female	Male	Total	Female	Male	Total
Under 30	10	16	26	22	34	56
30–50	40	35	75	62	64	126
Over 50	0	0	0	0	0	0

There are no employees aged over 50 at Odeatech.

Employees by Length of Service	2023		2024		2025	
	Female	Male	Female	Male	Female	Male
0–5 years	461	338	392	270	458	319
5–10 years	173	111	130	97	111	73
Over 10 years	86	201	129	94	141	109

New Hires and Promotions	2023		2024		2025	
	Female	Male	Female	Male	Female	Male
New Hires	256	185	207	154	190	185
Promotions	111	74	131	85	114	90

Open Positions	2023	2024	2025
Total Open Positions	602	398	399*
Positions Filled by Female Candidates	313	218	199
Positions Filled by Male Candidates	246	160	192
Positions Filled by Internal Female Candidates	57	11	9
Positions Filled by Internal Male Candidates	61	6	7
Positions Filled by Internal Candidates	118	17	16

** The total number of positions filled in 2025 was 391.*

Employee Turnover Rate*	2023			2024			2025		
	Female	Male	Total	Female	Male	Total	Female	Male	Total
Number of Employees Leaving	152	126	278	218	136	354	86	93	179
Employee Turnover Rate (%)	20	24	22	31	27	29	12	18	15
Voluntary Leavers	101	81	182	155	97	252	52	75	127
Voluntary Turnover Rate (%)	13	15	14	22	19	21	07	15	11

** In 2025, the overall employee turnover rate declined from 29% in 2024 to 15%. The voluntary turnover rate also decreased from 21% to 11%, indicating a significant improvement in employee retention.*

Management Structure	2023			2024			2025		
	Female	Male	Total	Female	Male	Total	Female	Male	Total
First-Level Managers	75	55	130	68	64	132	72	60	132
Middle Management	5	14	19	6	17	23	5	15	20
Senior Management	2	12	14	2	10	12	2	10	12

Managers by Age Group*	2023		2024		2025	
	Female	Male	Female	Male	Female	Male
Under 30	2	0	2	1	0	2
30–50	138	130	108	101	123	114
Over 50	13	19	12	12	14	13

**The 2023 data reported in the previous reporting period has been updated as part of the data verification process.*

Employees by Position	2023			2024			2025		
	Female	Male	Total	Female	Male	Total	Female	Male	Total
Revenue-Generating Functions	291	195	486	72	68	140	269	181	450
Employees in IT Departments	69	106	175	34	66	100	33	61	94
Employees in STEM Roles	21	32	53	59	83	142	33	60	93

Employee Training	2021	2022	2023	2024	2025
Total Training Hours	20,145	24,623	38,085	30,191	48,087
Average Training Hours per Employee	18.68	20.80	29.66	27.15	39.70
Leadership Training Hours	30.5	170	174	443	219

Parental Leave	2023			2024			2025		
	Female	Male	Total	Female	Male	Total	Female	Male	Total
Employees Taking Parental Leave	14	14	28	16	15	31	22	14	36
Employees Returning After Parental Leave	14	14	28	16	15	31	22	14	36
Employees Returning After Parental Leave and Remaining Employed for at Least 12 Months	11	12	23	13	12	25	14	10	24

Occupational Health and Safety Training	2021	2022	2023	2024	2025
Number of Employees Participating	1.659	350	714	757	1.571
Total Training Hours	13.272	2.800	2.293	4.864	2.067

Occupational Health and Safety	2021	2022	2023	2024	2025
Lost Time Injury Frequency Rate (LTIFR)	0	0	0,23	0	0
Lost-Time Injuries	0	1	1	0	0
Total Number of Accidents	0	1	1	0	0
Occupational Accidents	0	1	1	0	0
Fatalities	0	0	0	0	0

** No fatal occupational accidents occurred during the reporting period.*

Occupational Health and Safety Indicators	2025
Number of OHS Committees	3
Number of OHS Committee Members	32
Number of Employee Representatives	10
OHS Audits	38
Average Time to Close Non-Conformities	15 days
Emergency Drills Conducted	37
Emergency Drill Participation Rate	70%
Number of Occupational Diseases	0
Total Lost Days	0

Learning, Development, and Leadership	2025
Total training hours	48,087
Average training hours per employee	39.7
Participants in employee development programs	1,484
Leadership training hours	219
Participation rate in the Artificial Intelligence Development Program	51%
Number of Artificial Intelligence Literacy groups	12
Number of participants in the Artificial Intelligence Literacy Program	300
Number of employees participating in Data Science / Data Analytics training	302
Participants in diversity, discrimination and harassment awareness training	1,455

Social Impact Performance	2025
Number of social responsibility projects	9
Number of NGO partners	4
Total number of beneficiaries reached	3,933,473
Eşit Masallar (Fair Tales) books printed	1.3 million
Children reached directly through Eşit Masallar (Fair Tales)	200,000+
Total reach of Eşit Masallar (Fair Tales)	3.56 million
Digital book views	200,000+
Children and families reached through the theater production	100,000+
Number of girls supported	107
Number of accessibility improvement actions	10
Number of Investment-Focused Podcast episodes	14
Number of Accessibility Conversations episodes	8
Social investment budget (TRY)	21,546,201

Our Data Quality, Traceability and Assurance Approach

To enhance the reliability of our sustainability performance indicators, we focus on strengthening data ownership, calculation methodologies, internal control processes and reporting practices. In 2025, while consolidating environmental and social performance data with the relevant business units, our key priorities included clarifying methodological notes, improving the traceability of data sources and assessing the scope of assurance for selected indicators.

As part of our data management approach, we evaluate performance indicators together with the relevant data owners and place importance on explaining, through footnotes, any changes in scope, methodology or organizational structure that may affect year-on-year comparability. This approach supports the more reliable and meaningful use of reported data in both internal decision-making processes and external stakeholder assessments.

Looking ahead, we aim to strengthen the system-based monitoring of sustainability data, enhance our control mechanisms and expand the scope of indicators that may be subject to assurance.

OUR TARGETS AND AREAS FOR IMPROVEMENT

At Odeabank, we monitor our sustainability performance in alignment with our materiality topics, strategic priorities and senior management objectives. In 2025, we expanded our performance management approach beyond environmental and social indicators to include governance, sustainable finance, climate and environmental impact, digital resilience, human capital, customer experience and value chain dimensions.

Within this framework, we consolidated our performance across areas including energy and resource consumption, greenhouse gas emissions, renewable electricity use, waste management, employee experience, learning and development, diversity, equity and inclusion, occupational health and safety, social impact and value chain management, with contributions from our relevant business units.

Going forward, we aim to further develop our performance management approach into a more measurable, comparable and target-oriented structure. In this context, we will strengthen the definition of baseline years, time horizons, responsible business units, data ownership, methodologies and implementation status for selected indicators.

PERFORMANCE FRAMEWORK LINKED TO SENIOR MANAGEMENT OBJECTIVES

Report Main Section	2025 Focus Area	Actions Monitored	Contribution to Performance Management
Empowering and Transformative Banking	Sustainability governance, reporting quality, ethical compliance and data infrastructure	TSRS compliant sustainability reporting, ethics and compliance initiatives, alignment preparations for the ADQ sustainability data system, review of internal governance processes	Strengthened the integration of sustainability topics into senior management oversight, reporting processes and decision-making mechanisms.
Financial Empowerment	Digitalization, process automation, operational efficiency and cyber resilience	RPA platform transformation, process optimization, centralized log management, next-generation operations roadmap and actions to reduce audit findings	Supported the integration of digitalization and operational efficiency initiatives into sustainability performance.
Responsible Transformative Finance	Financing the transition to a low-carbon economy GAR preparations and operational environmental impact	Monitoring green loan disbursements, customer awareness initiatives, development of a green-certified customer portfolio, GAR preparations and carbon emission reduction actions	Supported stronger integration between sustainable finance, portfolio transformation and operational environmental performance.
Human-Centered Banking	ESG awareness, sustainability culture and employee capabilities	E-learning modules and assessments on ESG, sustainability and green assets; awareness initiatives for credit allocation departments, business units and branches	Contributed to the dissemination of sustainability knowledge across the Bank and its integration into business processes.

In 2025, our sustainability agenda was supported by objectives and actions implemented across different business units. These priorities focused on sustainable finance, climate and environmental impact, reporting and data infrastructure, operational efficiency, digital resilience, ESG awareness and corporate compliance.

OUR DEVELOPMENT AREAS AND IMPROVEMENT PRIORITIES

In 2025, we monitored the key development areas within our performance management approach together with the related KPI areas and our improvement priorities beyond 2026. This structure enables us to evaluate our sustainability performance not only through annual results but also in terms of methodology, data ownership, target monitoring and long-term development priorities.

Development Area	Key 2025 Approach	KPIs / Performance Areas Monitored	2026 and Beyond Improvement Focus
Sustainability Governance and Reporting	Implemented TSRS compliant Sustainability reporting, system-based sustainability data monitoring, alignment with the ADQ data infrastructure and adaptation to ethical standards.	TSRS compliance, data ownership, sustainability data systems, ethics and compliance processes, governance structure	Strengthen data ownership, control mechanisms and the linkage between KPIs and senior management objectives.
ESG Awareness and Capacity Building	Supported training programs and assessments on ESG, sustainability and green assets for credit allocation departments, business units and branches.	ESG training, participation, assessment success rates, role-based awareness	Expand role-based ESG training and monitor training outcomes through measurable indicators.
Sustainable Finance and Green Lending	Monitored green loan disbursements and conducted customer awareness initiatives in sectors requiring green transition.	Green loan disbursements, sustainable finance volume, customer awareness initiatives, green-certified customer portfolio	Clarify sustainable finance definitions, targets and impact indicators.
GAR and Portfolio Monitoring	Conducted preparations for GAR reporting, including data collection, assignment of responsible data owners and methodology alignment.	GAR calculation infrastructure, portfolio classification, data collection procedures	Establish a permanent, repeatable and auditable GAR calculation infrastructure.
Operational Environmental Impact	Monitored carbon-efficient solutions and environmental impact reduction initiatives across logistics, real estate management and support functions.	Scope 1, Scope 2 and Scope 3 emissions, energy consumption, I-REC, water consumption, waste generation, resource efficiency	Strengthen year-on-year comparability and intensity indicators for emissions, energy, water and waste.
Digitalization and Operational Efficiency	Implemented RPA platform transformation, process optimization, a next-generation operations roadmap and actions to reduce audit findings.	RPA migration, automation coverage, process optimization, operational efficiency indicators	Measure the contribution of digitalization and automation initiatives to resource efficiency, productivity and business continuity.
Data Security and Cyber Resilience	Strengthened the security and traceability of digital processes through centralized log management, system monitoring and infrastructure improvements.	Log management, information security processes, business continuity, cyber resilience indicators	Monitor incident management, training, testing and business continuity indicators on a year-on-year comparable basis.
Financial Resilience	Supported financial resilience through a strong capital structure, effective risk management and a selective growth strategy.	Total assets, loan portfolio, deposits, equity, capital adequacy and liquidity indicators	Increase the visibility of sustainability-related risks and opportunities on financial resilience.
Accessible and Inclusive Banking	Strengthened inclusive banking through digital channels, financial literacy initiatives and customer-focused solutions.	Digital channel usage, customer experience, financial literacy, accessibility improvements	Strengthen measurement of access, outputs and impacts for financial literacy and inclusive banking initiatives.
Employee Experience and Capability Development	Supported employee capabilities through learning, development, leadership and talent management programs.	Total training hours, training hours per employee, sustainability training, talent programs, leadership development	Strengthen role-based development programs focused on sustainability, digitalization, artificial intelligence and risk management.
Diversity, Equity and Inclusion	Monitored employee demographics, female employee and female management ratios, equal opportunity and inclusive culture initiatives.	Female employee ratio, female manager ratio, age and gender breakdowns, employees with disabilities, discrimination cases	Strengthen target-based monitoring of diversity and inclusion indicators.
Employee Health, Safety and Well-being	Supported employee experience through occupational health and safety, well-being and wellness initiatives.	OHS training, occupational accident indicators, employee turnover, parental leave, well-being initiatives	Monitor OHS and well-being indicators together with employee experience and retention indicators.
Social Impact and Social Investments	Supported social impact through community investment programs, financial literacy initiatives, accessibility and volunteering programs.	Social investment projects, direct beneficiaries, total reach, volunteering, mentoring, financial literacy outcomes	Establish a systematic social impact measurement approach covering reach, outputs and impacts.
Value Chain Management	Addressed supplier management, procurement processes and value chain impacts from a sustainability perspective.	Total number of suppliers, local supplier ratio, procurement expenditure, supplier assessment processes	Integrate environmental and social criteria more systematically into supplier assessment processes.

OUR DEVELOPMENT PRIORITIES FOR 2026 AND BEYOND

Looking ahead, we aim to evolve our sustainability performance management approach into a structure that is more measurable, comparable and more closely integrated with decision-making processes. Within this framework, we have identified four key development priorities.

Development Area	Our Priority	Expected Contribution
Data and Governance	Strengthen the linkage between KPIs for materiality topics and senior management objectives while improving data ownership, control mechanisms and reporting quality.	More reliable, traceable and comparable sustainability data.
Climate and Responsible Finance	Strengthen methodologies for sustainable finance, green lending and GAR indicators while advancing CDP, PCAF and UN Global Compact Climate Ambition Accelerator initiatives.	More systematic monitoring of climate performance, portfolio impacts and transition finance.
People and Social Impact	Expand role-based ESG training and strengthen the measurement approach for employee experience, diversity, social investment, volunteering and social impact indicators.	Greater visibility of human capital and social value performance.
Digital Resilience and Value Chain	Further integrate digitalization, automation, cybersecurity, data security, business continuity and supplier management indicators into the sustainability performance framework.	Enhanced operational resilience, efficiency and value chain traceability.

Guided by this roadmap, we will continue to develop our sustainability performance not merely as an annual reporting outcome, but as a dynamic management tool that supports strategic decision-making, risk management, resource efficiency and long-term value creation.

KPI MAP FOR MATERIALITY TOPICS

To enhance the traceability of performance related to our materiality topics, we map each materiality topic to the relevant report section, key KPI areas monitored, and performance indicators. This map establishes a clear link between the strategic narrative of the report and our environmental and social performance indicators, enabling readers to more easily monitor our progress on materiality topics.

The indicators included in the KPI map represent the primary measurement areas used to assess performance for each materiality topic. To ensure that these indicators are monitored reliably and consistently over time, it is important to clearly define data ownership, calculation methodologies, and reporting responsibilities. Accordingly, sustainability performance indicators are consolidated in collaboration with the relevant business units, while any changes in scope, methodology, or organizational structure that may affect year-on-year comparability are disclosed through explanatory footnotes.

Actual performance data for these indicators is presented under the environmental and social performance tables in the "*2025 Performance Indicators*" section.

HOW TO READ THE KPI MAP?

The indicators included in the KPI map are monitored at three levels:

- Management and governance indicators: Show how each topic is managed, including the relevant policies, committees, processes, and data ownership structures.
- Performance and outcome indicators: Present the quantitative and qualitative results achieved during the reporting period.
- Impact and improvement indicators: Demonstrate the impacts of materiality topics on stakeholders, the environment, employees, customers, and the value chain, while highlighting areas for future improvement.

This structure establishes a traceable connection between our materiality topics and the performance tables presented throughout the report.

Main Report Section	Relevant Subsection	Materiality Topic Linkage	Key KPI Areas Monitored	Indicator Type
Empowering and Transformative Banking	Our Strategy and Materiality Topic	Sustainability strategy, long-term value creation, strategic priorities	Materiality topic-related targets, monitored KPI areas, SDG alignment, sustainability initiatives	Management / Governance
	Our Double Materiality Assessment Model	Impact and financial materiality, stakeholder expectations, prioritization results	Materiality topic list, materiality level, stakeholder groups, risk and opportunity linkage	Management / Governance
	Risks, Opportunities and Resilience	Climate risks, transition risks, physical risks, operational resilience	Climate-related risks and opportunities, scenario analyses, risk management processes, TSRS related indicators	Risk / Resilience
	Corporate Governance and Our Sustainability Governance	Sustainability governance, decision-making mechanisms, senior management oversight	Committee structure, working group operations, policies and procedures, data ownership, performance monitoring	Management / Governance
	Our Ethics and Compliance Approach	Ethical culture, compliance, anti-bribery and anti-corruption	Ethics and compliance training, reporting mechanisms, policy coverage, employee awareness	Management / Performance
Financial Empowerment	Digitalizing and Enhancing Customer Experience	Digital transformation, customer experience, innovation	Digital channel usage, customer experience indicators, digital products and services, process automation	Performance / Outcome
	Data Security and Cyber Resilience	Cybersecurity, data privacy, operational security	Information security training, cybersecurity practices, data protection processes, log management, business continuity operations	Risk / Resilience
	Strengthening Financial Resilience	Financial performance, strong balance sheet, capital and liquidity structure	Total assets, loan portfolio, deposits, shareholders' equity, capital adequacy, liquidity indicators	Performance / Outcome
	Accessible and Inclusive Banking	Financial inclusion, financial literacy, accessible services	Financial literacy initiatives, inclusive products and services, digital accessibility, accessibility improvements	Impact / Contribution
Responsible Transformation Finance	Financing the Transition to a Low-Carbon Economy	Sustainable finance, green loans, transition finance, low-carbon economy	Sustainable finance volume, green lending, sustainable products, customer awareness activities	Performance / Outcome
	Climate-Focused Transition Approach	Climate-related risks and opportunities, TSRS compliant disclosures, portfolio transition	Climate risk analysis, scenario studies, GAR preparations, PCAF preparations, CDP preparations, portfolio monitoring	Risk / Resilience
	Responsible Products and Services	Responsible banking, sustainable products, supporting customer transition	Sustainable finance products, financing practices aligned with ESG criteria, customer transition support	Impact / Contribution
	Operational Environmental Impact	Energy, emissions, water, waste, and resource efficiency	Scope 1, Scope 2 (location-based and market-based), Scope 3 emissions, energy consumption, I-REC usage, water consumption, waste generation, recycling	Performance / Outcome
	Value Chain Management	Responsible procurement, supplier management, local sourcing	Total number of suppliers, local supplier ratio, procurement expenditures, supplier assessment processes, ESG criteria	Management / Performance
Human-Centered Banking	Empowering Talent	Training, development, talent management, leadership	Total training hours, average training hours per employee, leadership training, sustainability training, talent and development programs	Performance / Outcome
	Diversity, Equity and Inclusion	Equal opportunity, inclusive culture, gender equality	Female employee ratio, female manager ratio, female representation in governance bodies, number of employees with disabilities, discrimination cases, WEPs-related indicators	Impact / Contribution
	Employee Experience, Health and Well-being	Employee engagement, employee well-being, occupational health and safety	Number of employees, employee turnover rate, voluntary turnover rate, parental leave, return-to-work rate, OHS training, occupational accident indicators	Performance / Outcome
	Social Impact and Community Investment	Social benefit, financial literacy, inclusive social impact	Direct beneficiaries, total reach, volunteering, mentoring, financial literacy and accessibility indicators	Impact / Contribution

AÇELYA YILDIRIM KARACA
Inbound Calls and Video Services
Customer Representative
Tropical Butterfly Garden, Konya

Appendix

MEMBERSHIPS AND COLLABORATIONS

Membership / Initiative / Collaboration	Type of Participation	Strategic Contribution Area	2025 Output / Contribution	Related Materiality Topic / Report Section
PCAF - Partnership for Carbon Accounting Financials	Membership	Measurement of financed emissions and assessment of climate-related risks	Enhanced capacity to measure financed emissions from the loan portfolio using an internationally recognized methodology.	Climate-Focused Transition Approach / Responsible Products and Sevices
UN Global Compact	Signatory / Commitment	Alignment with principles on human rights, labour standards, environment, and anti-corruption	Supported the strengthening of our sustainability approach in line with universally recognized principles.	Corporate Governance and Our Sustainability Governance / Human-Centered Banking / Operational Environmental Impact
Women's Empowerment Principles (WEPs)	Signatory / Commitment	Gender equality and women's economic empowerment	Served as a reference framework for policies, practices, and awareness initiatives supporting women's empowerment in the workplace.	Diversity, Equity and Inclusion
One Million Women Mentors (1 MILLION WOMEN TO TECH)	Program Participation	Women's career development and mentoring	Contributed to mentoring initiatives that support women's advancement in professional life.	Human-Centered Banking
The Banks Association of Türkiye (TBB)	Membership	Sector-wide policy development, regulatory engagement, and best practices	Participated in monitoring sector developments and collaborative evaluation processes.	Corporate Governance and Ethics / Risks, Opportunities and Resilience
TBB Sustainability Working Group	Active Participant	Sustainable banking, TSRS compliance, and sector knowledge sharing	Contributed to industry knowledge sharing on TSRS compliance and sustainability practices.	Corporate Governance and Our Sustainability Governance / Risks, Opportunities and Resilience
BCSD Türkiye (SKD Türkiye)	Membership	Collaboration and best practice sharing for sustainable development	Supported the monitoring of sector developments and the adoption of sustainability best practices.	Our Strategy and Materiality Topics / Creating Value Together with Our Stakeholders
IFC	Partnership	Sustainable finance, investment, and institutional capacity building	Contributed to institutional capacity development for sustainable development through international financing and technical knowledge sharing.	Responsible Transformation Finance / Value Chain Management
EBRD	Partnership	Green finance, ESG integration, and environmental and social risk management	Supported green finance projects and alignment with ESG criteria.	Responsible Transition Finance / Environmental and Social Risk Management in Lending Operations
Finance in Motion	Partnership	Financing investments with high environmental and social impact	Enhanced access to sustainability-focused funds and strengthened impact finance capacity.	Responsible Transformation Finance
FMO	Business Partner	International financing and sustainable investments	Contributed to strengthening institutional capacity and supporting sustainable investments.	Responsible Transformation Finance
Proparco	Business Partner	ESG-based financing and monitoring processes	Supported the development of financing models aligned with ESG principles.	Responsible Transformation Finance / Risks, Opportunities and Resilience
Export Development Inc. of Türkiye (İGE A.Ş.)	Project Partnership	Facilitating access to finance for SMEs and exporting companies	Contributed to economic development by providing financing support to exporting companies.	Strengthening Financial Resilience / Commercial Banking
TÜSİAD	Corporate Membership	Business dialogue, public policy engagement, and corporate visibility	Supported engagement with the business community and monitoring of key developments.	Creating Value with Our Stakeholders / Corporate Governance and Our Sustainability Governance
YASED	Corporate Membership	International investment ecosystem and policy dialogue	Strengthened engagement with the investment ecosystem in foreign direct investment and investor relations.	Creating Value with Our Stakeholders / Strengthening Financial Resilience
Corporate Communications Association	Corporate Membership	Communication strategies, reputation management, and industry best practices	Supported the development of corporate communication practices in line with current trends.	Creating Value with Our Stakeholders

AWARDS AND ACHIEVEMENTS

THE HAMMERS AWARDS

Brand Experience, Media and Content Category: ***Bronze Award for the Odea Radio Project*** – Best Team in the Use of Audio Platforms

Strategy Category: ***Silver Award for the Odeabank Eşit Masallar (Fair Tales) Project*** – Sustainable Success Team

Corporate Social Responsibility and Sustainability Category: ***Silver Award for the Odeabank Eşit Masallar (Fair Tales) Project*** **–** Best Team in Gender Equality

PRIDA AWARDS 2025

Grand Award in Digital and Social Media for the **Odea Radio Project**

Creative / Innovative Media Use for the **Odea Radio Project**

Digital Community Building and Management for the **Odea Radio Project**

Music Platforms and Podcast Award for the **Odea Radio Project**

THE STEVIE AWARDS 2025

Gold Stevie Award in the New category for the Agentic Generative AI Project – OdeAssistant (Procedure Assistant)

Bronze Stevie Award in the Business Intelligence Solution – Implementation category for the RM Dashboard

QORUS REINVENTION AWARDS

First Prize in the Operational Excellence category for the Commercial Banking – "Commercial Boost: RM Dashboard" project

REGULATORY COMPLIANCE ASSOCIATION COMPLIANCE AWARDS

5th Regulatory Compliance Conference, Organized by the Regulatory Compliance Association received ***Professional Development Support Award***

THE INSTITUTE OF INTERNAL AUDITING TÜRKIYE AWARENESS AWARDS 2025

Corporate Awareness Award

ŞIKAYETVAR A.C.E. ACHIEVEMENT IN CUSTOMER EXCELLENCE 2025

Diamond Award in the Banking – Segment B category

PMI TÜRKİYE PMO AWARDS 2025

Community Engagement and Culture Award

POLICIES AND APPROACHES

Our Policies	Our Approach	Relevant Materiality Topic
Sustainability Policy	At Odeabank, through our Sustainability Policy, we integrate ESG principles into all our operations, decision-making processes, and stakeholder relationships. In alignment with the SDGs, Türkiye's 2053 Net Zero target, and the UN Global Compact 10 principles, we set out our approach to combating climate change, promoting inclusive growth, responsible finance, human rights, sustainable procurement, ethical governance, TSRS compliant sustainability reporting, transparency, and continuous improvement.	1. Low-Carbon Economy Financing, 4. Diversity, Equity and Inclusion, 8. Responsible Products and Services, 9. Environmental Impact, 11. Renewable Energy, 12. Business Ethics, Compliance and Anti-Corruption, 13. Risk Management, 14. Corporate Governance, 16. Financial Inclusion
TSRS 1 and TSRS 2 Compliance Procedure	The TSRS 1 and TSRS 2 Compliance Procedure defines the governance, responsibilities, data collection, materiality assessment, assurance, and publication processes across the Bank to ensure that sustainability- and climate-related financial disclosures are prepared in a transparent, reliable, and TSRS compliant manner.	9. Environmental Impact, 12. Business Ethics, Compliance and Anti-Corruption, 13. Risk Management, 14. Corporate Governance
Environmental and Social Policy and Excluded Operations List	Through our Environmental and Social Policy, we establish the fundamental principles for managing the environmental and social impacts that may arise from our lending operations. Based on the IFC Excluded Operations List, we do not finance operations included in Odeabank's Excluded Operations List or lending transactions that fail to comply with applicable environmental and social legislation.	1. Low-Carbon Economy Financing, 8. Responsible Products and Services, 9. Environmental Impact, 12. Business Ethics, Compliance and Anti-Corruption, 13. Risk Management, 14. Corporate Governance
Corporate Social Responsibility Policy	Through our products and services that support sustainable development, we create social value in the areas of women's empowerment, education, culture, sports, accessibility, and the environment, encourage volunteering, and refrain from financing excluded operations in line with the principles of responsible banking.	4. Diversity, Equity and Inclusion, 8. Responsible Products and Services, 9. Environmental Impact, 15. Financial and Digital Literacy, 16. Financial Inclusion, 19. Community Investment Programs
Human Resources Policy	Through our Human Resources Policy, we recognize that our most valuable asset is our human capital and aim to ensure that our employees adopt a professional, fair, and effective approach in compliance with ethical values, applicable laws, and the Bank's rules.	4. Diversity, Equity and Inclusion, 5. Talent Management, 7. Employee Health, Well-being and Safety, 12. Business Ethics, Compliance and Anti-Corruption, 14. Corporate Governance
Human Rights Policy	Through our Human Resources and Human Rights Policy, we strengthen our sustainable workplace culture by enhancing the employee experience while promoting ethics, discipline, regulatory compliance, equality, diversity, inclusion, occupational health and safety, and open communication. Our Human Rights Policy is incorporated into our Human Resources Regulation.	4. Diversity, Equity and Inclusion, 5. Talent Management, 7. Employee Health, Well-being and Safety, 12. Business Ethics, Compliance and Anti-Corruption
Remuneration Policy	Through our Remuneration Policy, we establish the remuneration principles applicable to all employees based on regulatory compliance, ethical values, strategic objectives, internal equity, market dynamics, individual performance, objective recruitment and promotion practices, and effective risk management.	4. Diversity, Equity and Inclusion, 5. Talent Management, 7. Employee Health, Well-being and Safety, 12. Business Ethics, Compliance and Anti-Corruption, 13. Risk Management, 14. Corporate Governance
Anti-Bribery and Corruption Policy	Through our Anti-Bribery and Anti-Corruption Policy, we uphold high ethical standards, transparency, and accountability for all our employees and related parties. With our zero-tolerance approach, we provide guidance on the effective implementation of risk-based control, reporting, and enforcement mechanisms in compliance with national and international regulations.	12. Business Ethics, Compliance and Anti-Corruption, 13. Risk Management, 14. Corporate Governance, 18. Prevention of Financial Crime

Our Policies	Our Approach	Relevant Materiality Topic
Financial Crime Policy	We are committed to full compliance with national and international regulations on anti-money laundering and counter-terrorist financing. Within this framework, we implement an effective risk-based strategy aimed at minimizing relevant risks and expect all employees to act in accordance with this policy.	12. Business Ethics, Compliance and Anti-Corruption, 13. Risk Management, 14. Corporate Governance, 18. Prevention of Financial Crime
Personal Data Protection and Processing Policy	In accordance with the Personal Data Protection Law, we prioritize the privacy and security of personal data relating to individuals associated with our products and services. Through our Personal Data Protection and Processing Policy, we establish the principles governing the lawful processing, retention, and protection of personal data.	2. Cybersecurity and Data Security, 6. Customer Experience, 12. Business Ethics, Compliance and Anti-Corruption, 13. Risk Management, 14. Corporate Governance
Domestic and International Sanctions Policy	We implement the necessary policies, procedures, and control mechanisms to prevent prohibited or high-risk persons, entities, products, and services subject to national and international sanctions from being involved in banking transactions. Through this approach, we aim to protect the Bank's and our customers' assets, support the secure functioning of the financial system, and mitigate reputational and financial loss risks. While evaluating our products and services through a risk-based perspective, we continuously strengthen our internal control framework, responsibilities, and employee awareness.	8. Responsible Products and Services, 12. Business Ethics, Compliance and Anti-Corruption, 13. Risk Management, 14. Corporate Governance, 18. Prevention of Financial Crime
Information Security Policy	Through our Information Security Policy, we manage customer and employee information in a manner that safeguards its confidentiality, integrity, and availability. Through legally compliant, risk-based, and continuously improved practices, we support operational continuity while aiming to provide a secure and resilient working environment.	2. Cybersecurity and Data Security, 3. Digital Transformation, 6. Customer Experience, 12. Business Ethics, Compliance and Anti-Corruption, 13. Risk Management
Code of Ethics and Conduct	We conduct our operations in line with the principles of integrity, transparency, and accountability. To encourage our employees to act in accordance with ethical values, we clearly define our standards of conduct and regard compliance with these principles as an integral part of our corporate culture.	12. Business Ethics, Compliance and Anti-Corruption, 13. Risk Management, 14. Corporate Governance
Diversity, Equity and Inclusion Policy	Through our Diversity, Equity and Inclusion Policy, we set out our commitment to providing a fair, inclusive, and discrimination-free working and service environment for all our employees and stakeholders. Without permitting discrimination based on gender, age, ethnicity, physical abilities, socio-economic background, belief system, or any other personal characteristic, we uphold the principle of equal opportunity in recruitment, development, promotion, remuneration, and employee experience processes. Through this approach, we foster an inclusive workplace culture where differences can be expressed with confidence and everyone feels valued and an integral part of our corporate culture.	4. Diversity, Equity and Inclusion, 5. Talent Management, 6. Customer Experience, 7. Employee Health, Well-being and Safety, 14. Corporate Governance

OUR CONTRIBUTION TO THE SUSTAINABLE DEVELOPMENT GOALS

Sustainable Development Goal	Odeabank's Contribution	Relevant SDG Target	Related Materiality Topic	Strategic Focus Area
2 ZERO HUNGER	We support rural development through loan products tailored to a wide range of sectors, including agriculture and livestock farming.	**2.3** By 2030, double the agricultural productivity and incomes of small-scale food producers, in particular women, Indigenous peoples, family farmers, pastoralists and fishers, including through secure and equal access to land, other productive resources and inputs, knowledge, financial services, markets, opportunities for value addition and non-farm employment.	• Responsible Products and Services • Financial Inclusion • Community Investment Programs	*Responsible Transformation Finance*
3 GOOD HEALTH AND WELL-BEING	We prioritize the physical and mental well-being of our employees by implementing workplace practices that promote healthy living.	**3.8** Achieve universal health coverage, including financial risk protection, access to quality essential healthcare services, and access to safe, effective, quality and affordable essential medicines and vaccines for all.	• Employee Health and Safety • Community Investment Programs	*Human-Centered Banking*
4 QUALITY EDUCATION	We develop financial literacy initiatives and employee training programs. Through the Investment-Focused Podcast, one of Türkiye's most-listened-to economics podcasts, we enhance individuals' investment awareness, while extending this impact through Odea Radio and newly launched video content series. In addition, Akademi'O, the digital financial education platform within the Odea mobile application, aims to strengthen social welfare and economic stability in the long term by improving financial literacy.	**4.4** By 2030, substantially increase the number of youth and adults with relevant skills, including technical and vocational skills, for employment, decent jobs and entrepreneurship. **4.7** By 2030, ensure that all learners acquire the knowledge and skills needed to promote sustainable development, including through education for sustainable development and sustainable lifestyles, human rights, gender equality, promotion of a culture of peace and non-violence, global citizenship, and appreciation of cultural diversity and culture's contribution to sustainable development.	• Financial and Digital Literacy • Talent Management • Community Investment Programs	*Human-Centered Banking*
5 GENDER EQUALITY	We promote the equal participation of women in social, cultural, and economic life through numerous long-standing initiatives. Through our Eşit Masallar (Fair Tales) project, we reinterpreted classic fairy tales through a gender equality perspective, reaching 1.3 million children and delivering messages of equality to more than 100,000 children through theater performances. We have also sponsored the Istanbul Theater Festival for four consecutive years under the theme "There's a Woman Behind This", highlighting women's contributions to the arts. Dedicated support packages for women exporters encourage women's economic participation. In addition, we launched the "Mentorship from Odeabank Volunteers to Young Women" program to further support gender equality.	**5.1** End all forms of discrimination against all women and girls everywhere. **5.5** Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life.	• Diversity, Equity and Inclusion • Financial Inclusion • Talent Management	*Human-Centered Banking*
7 AFFORDABLE AND CLEAN ENERGY	We procure I-REC-certified renewable electricity and support energy efficiency and renewable energy projects through our green transition loans.	**7.2** By 2030, substantially increase the share of renewable energy in the global energy mix **7.3** By 2030, double the global rate of improvement in energy efficiency.	• Financing the Low-Carbon Economy • Renewable Energy • Environmental Impact • Responsible Products and Services	*Responsible Transformation Finance*

Sustainable Development Goal	Odeabank's Contribution	Relevant SDG Target	Related Materiality Topic	Strategic Focus Area
8 DECENT WORK AND ECONOMIC GROWTH	We support employment and provide fair working conditions. Our Human Resources Policy is built on fair compensation, diversity and inclusion, aiming to provide equal opportunities for every employee. We implement comprehensive practices that enable all employees, including women, young people, and persons with disabilities, to realize their full potential. We also contribute to economic growth through dedicated financial solutions for women entrepreneurs and SMEs.	**8.5** By 2030, achieve full and productive employment and decent work for all women and men, including young people and persons with disabilities, and equal pay for work of equal value.	• Diversity, Equity and Inclusion • Talent Management • Financial Inclusion • Customer Experience	*Human-Centered Banking*
9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	We support sustainability through digital banking, fintech collaborations, and innovative services. Innovative solutions developed under Odeatech make financial services more accessible, secure, and user-friendly.	**9.3** Increase the access of small-scale industrial and other enterprises, particularly in developing countries, to financial services, including affordable credit, and their integration into value chains and markets. **9.4** By 2030, upgrade infrastructure and retrofit industries to make them sustainable, with increased resource-use efficiency and greater adoption of clean and environmentally sound technologies and industrial processes.	• Digital Transformation • Cybersecurity and Data Security • Fintech and Innovation	*Financial Empowerment*
10 REDUCED INEQUALITIES	We support social inclusion through accessibility initiatives and an equitable service approach. Through our collaboration under the ''Accessible Everything'' social initiative, we launched the "Conversations on Accessibility" podcast series on Odea Radio, aiming to raise awareness of accessibility and contribute to the full and equal participation of persons with disabilities in social life.	**10.2** By 2030, empower and promote the social, economic and political inclusion of all, irrespective of age, sex, disability, race, ethnicity, religion, economic or other status.	• Financial Inclusion • Diversity, Equity and Inclusion	*Human-Centered Banking*
12 RESPONSIBLE CONSUMPTION AND PRODUCTION	We prioritize reducing consumption through energy management and efficiency practices. Our banking operations emphasize efficient resource use, expand digital solutions that reduce paper consumption, and promote operational practices with lower environmental impact.	**12.2** By 2030, achieve the sustainable management and efficient use of natural resources.	• Environmental Impact • Circular Economy • Financing the Low-Carbon Economy • Renewable Energy	*Responsible Transformation Finance*
13 CLIMATE ACTION	We support the transition through sustainable finance products, particularly green transition loans, and climate risk management. We have also developed products such as Green Deposit, enabling individuals and organizations to make savings and investment choices that reduce their environmental impact.	**13.2** Integrate climate change measures into national policies, strategies and planning.	• Financing the Low-Carbon Economy • Responsible Products and Services • Renewable Energy • Environmental Impact	*Responsible Transformation Finance*
17 PARTNERSHIPS FOR THE GOALS	We create shared value by developing partnerships with national and international organizations. In this context, we actively participate in the sustainability working groups of the Banks Association of Türkiye (TBB), the Business Council for Sustainable Development Türkiye (SKD Türkiye), the International Investors Association (YASED), and TÜSİAD.	**17.16** Enhance the Global Partnership for Sustainable Development by complementing multi-stakeholder partnerships that mobilize and share knowledge, expertise, technology and financial resources to support the achievement of the Sustainable Development Goals, particularly in developing countries.	• Fintech and Innovation • Corporate Governance • Business Ethics and Compliance • Risk Management	*Financial Empowerment*

WOMEN'S EMPOWERMENT PRINCIPLES (WEPs)

WEPs Principle	Corresponding Approach in the Report	Related GRI Disclosures	Relevant Section	Page No.
Principle 1: Establish high-level corporate leadership for gender equality	Demonstrating commitment to diversity, equity and inclusion at the Board of Directors and senior management levels; reporting on sustainability governance and the WEPs commitment.	**GRI 2-9, 2-12, 2-13, 2-14, 2-23, 2-24, 2-29, 3-3, 405-1**	*Corporate Governance and Our Sustainability Governance; Diversity, Equity and Inclusion*	39, 88
Principle 2: Treat all women and men fairly at work – respect and support human rights and non-discrimination	Fair employment, equal opportunity, anti-discrimination practices, employee rights, parental leave, and inclusive human resources practices.	**GRI 2-7, 2-23, 2-24, 2-25, 2-26, 3-3, 401-1, 401-2, 401-3, 405-1, 405-2, 406-1**	*Diversity, Equity and Inclusion; Employee Experience, Health and Well-being; Empowering Talent*	88, 90, 85
Principle 3: Ensure the health, safety and well-being of all women and men workers	Occupational health and safety, employee well-being, a safe working environment, parental support processes, and employee assistance practices.	**GRI 3-3, 401-2, 401-3, 403-1, 403-2, 403-3, 403-4, 403-5, 403-6, 403-9, 403-10**	*Employee Experience, Health and Well-being*	90
Principle 4: Promote education, training and professional development for women	Development of women employees through leadership and talent programs, training hours, career development, and performance evaluation processes.	**GRI 3-3, 404-1, 404-2, 404-3, 405-1**	*Empowering Talent; Diversity, Equity and Inclusion*	85, 88
Principle 5: Implement enterprise development, supply chain and marketing practices that empower women	Responsible procurement, supplier management, partnerships supporting women's economic empowerment, and an inclusive communications approach.	**GRI 2-6, 2-23, 2-24, 3-3, 204-1, 308-1, 414-1, 414-2**	*Value Chain Management; Social Impact and Community Investments; Our Ethics and Compliance Approach*	81, 92, 50
Principle 6: Promote equality through community initiatives and advocacy	Supporting gender equality through girls' education, mentoring, financial literacy, and community investment programs.	**GRI 2-28, 2-29, 3-3, 203-1, 203-2, 413-1**	*Social Impact and Community Investments; Strengthening Financial Resilience; Diversity, Equity and Inclusion*	92, 64, 88
Principle 7: Measure and publicly report on progress to achieve gender equality	Reporting on the percentage of women employees, women managers, female representation in governing bodies, discrimination cases, parental leave, and social impact indicators.	**GRI 2-2, 2-3, 2-4, 2-22, 2-29, 3-3, 401-3, 405-1, 405-2, 406-1**	*Performance and Areas for Progress; Diversity, Equity and Inclusion; GRI Content Index*	96, 88,119

UN GLOBAL COMPACT REFERENCE TABLE

Odeabank supports the Ten Principles of the United Nations Global Compact in the areas of human rights, labour standards, environment, and anti-corruption. These principles are addressed through our approach to ethics, compliance, respect for human rights, employee experience, environmental impact management, and responsible banking.

Area	Principle	Relevant Approach / Content Reference in the Report	Relevant Section	Page No.
Human Rights	Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.	**Respect for human rights, an ethical business culture, an inclusive working environment, and a responsible banking approach toward stakeholders.**	*Our Ethics and Compliance Approach; Diversity, Equity and Inclusion; Value Chain Management*	50, 88, 81
Human Rights	Principle 2: Businesses should ensure that they are not complicit in human rights abuses.	**Environmental and social risk assessment in lending processes, the prohibited operations list, supplier code of conduct, and ethical reporting mechanisms.**	*Risks, Opportunities and Resilience; Value Chain Management; Our Ethics and Compliance Approach*	35, 81, 50
Labour Standards	Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.	**Respect for employee rights, open communication channels, employee experience, and feedback mechanisms.**	*Employee Experience, Health and Well-being; Our Ethics and Compliance Approach*	90, 50
Labour Standards	Principle 4: Businesses should uphold the elimination of all forms of forced and compulsory labour.	**Prevention of forced labour and human rights violations, ethical principles, and a responsible approach throughout supplier and lending processes.**	*Our Ethics and Compliance Approach; Value Chain Management; Risks, Opportunities and Resilience*	50, 81, 35
Labour Standards	Principle 5: Businesses should uphold the effective abolition of child labour.	**Prevention of child labour, the prohibited operations list, supplier code of conduct, and social risk assessment processes.**	*Value Chain Management; Risks, Opportunities and Resilience; Our Ethics and Compliance Approach*	81, 35, 50
Labour Standards	Principle 6: Businesses should uphold the elimination of discrimination in respect of employment and occupation.	**Equal opportunity, an inclusive corporate culture, representation of women employees and women managers, and an anti-discrimination approach.**	*Diversity, Equity and Inclusion; Employee Experience, Health and Well-being*	88, 90
Environment	Principle 7: Businesses should support a precautionary approach to environmental challenges.	**Climate risk assessment, environmental and social risk management, and operational environmental impact management.**	*Climate-Focused Transition Approach; Operational Environmental Impact*	74, 78
Environment	Principle 8: Businesses should undertake initiatives to promote greater environmental responsibility.	**Energy, emissions, water and waste management; use of I-REC certificates; resource efficiency; and environmental awareness initiatives.**	*Operational Environmental Impact; Energy Management and Efficiency*	78, 76
Environment	Principle 9: Businesses should encourage the development and diffusion of environmentally friendly technologies.	**Financing the transition to a low-carbon economy, green loans, renewable energy, and sustainable finance practices.**	*Financing the Transition to a Low-Carbon Economy; Responsible Products and Services*	70, 73
Anti-Corruption	Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.	**Ethical principles, compliance policies, anti-bribery and anti-corruption practices, whistleblowing mechanisms, and prevention of financial crime.**	*Our Ethics and Compliance Approach; Corporate Governance and Our Sustainability Governance*	50, 39

GRI CONTENT INDEX

GRI Content Index	
Statement of Use	Odeabank has reported the information cited in this GRI Content Index for the period 1 January – 31 December 2025 with reference to the GRI Standards 2021.
GRI 1 Used	GRI 1: Foundation 2021

GRI Standard	Disclosure	Report Section / Direct Response	Page No.
GRI 2: General Disclosures 2021	2-1 Organizational details	Odeabank at a Glance; Shareholding and Capital Structure; Corporate Governance and Our Sustainability Governance	16, 17, 39
	2-2 Entities included in the organization's sustainability reporting	About This Report	5
	2-3 Reporting period, frequency and contact point	About This Report, Contact	5, 135
	2-4 Restatements of information	Environmental Performance Indicators; Social Performance Indicators; Our Data Quality, Traceability and Assurance Approach	97, 100, 105
	2-5 External Assurance	The Sustainability Report as a whole has not been subject to independent external assurance. However, the disclosures presented in the Bank's 2025 TSRS Compliant Sustainability Report have been subject to limited assurance by KPMG Bağımsız Denetim ve Serbest Muhasebeci Mali Müşavirlik A.Ş. in accordance with GDS 3000, "Assurance Engagements Other than Audits or Reviews of Historical Financial Information", and GDS 3410, "Assurance Engagements on Greenhouse Gas Statements", as issued by the Public Oversight, Accounting and Auditing Standards Authority of Türkiye. The limited assurance engagement is restricted to the disclosures presented in the 2025 TSRS Compliant Sustainability Report. Accordingly, the assurance scope covers the climate-related disclosures presented under the governance, strategy, risk management, metrics and targets pillars of the TSRS Compliant Sustainability Report, including Scope 1 and Scope 2 greenhouse gas emissions, the location-based and market-based breakdown of Scope 2 emissions, the greenhouse gas emissions calculation methodology, the operational control approach, disclosures related to the use of I-RECs, TSRS 2 Commercial Banks sector-specific metrics, assets vulnerable to climate-related risks, assets aligned with climate-related opportunities, capital deployment, and disclosures related to climate-related targets. Scope 3 emissions, including financed emissions, have not been disclosed in the 2025 TSRS Compliant Sustainability Report in line with the applicable TSRS transition reliefs and are therefore outside the limited assurance scope. Social indicators, customer experience metrics, employee-related indicators, community impact data, sustainable finance amounts and other performance indicators presented in this voluntary Sustainability Report, but not included in the TSRS Compliant Sustainability Report, have not been subject to separate independent external assurance.	119

GRI Standard	Disclosure	Report Section / Direct Response	Page No.
GRI 2: General Disclosures 2021	2-6 Operations, value chain and other business relationships	Odeabank at a Glance; Our Business Model; How We Create Value; Value Chain Management	16, 19, 21, 81
	2-7 Employees	Empowering Talent; Employee Experience, Health and Well-being; Social Performance Indicators	85, 90, 100, 102
	2-8 Workers who are not employees	Employee Experience, Health and Well-being; Social Performance Indicators	90, 100
	2-9 Governance structure and composition	Corporate Governance and Our Sustainability Governance	39
	2-10 Nomination and selection of the highest governance body	Corporate Governance and Sustainability Governance: Details of the relevant process are not disclosed within the scope of public reporting.	39
	2-11 Chair of the highest governance body	Corporate Governance and Our Sustainability Governance	39
	2-12 Role of the highest governance body in overseeing the management of impacts	Corporate Governance and Our Sustainability Governance; Risks, Opportunities and Resilience	39, 35
	2-13 Delegation of responsibility for managing impacts	Corporate Governance and Our Sustainability Governance; Sustainability Working Group	39, 49
	2-14 Role of the highest governance body in sustainability reporting	Corporate Governance and Our Sustainability Governance; About This Report	39, 5
	2-15 Conflicts of interest	Our Ethics and Compliance Approach; Our Corporate Governance and Sustainability Governance	50, 39
	2-16 Communication of critical concerns	Corporate Governance and Our Sustainability Governance; Our Ethics and Compliance Approach: There were no critical concerns requiring public disclosure during the reporting period.	39, 50
	2-17 Collective knowledge of the highest governance body	Corporate Governance and Our Sustainability Governance; Board Competency Matrix	39,43
	2-18 Evaluation of the performance of the highest governance body	Corporate Governance and Our Sustainability Governance: Details of the evaluation process are not disclosed within the scope of public reporting.	39
	2-19 Remuneration policies	Policies and Approaches; Corporate Governance and Our Sustainability Governance; Empowering Talent	113, 39, 85
	2-20 Process to determine remuneration	Policies and Approaches; Corporate Governance and Our Sustainability Governance; Empowering Talent	113, 39, 85
	2-21 Annual total compensation ratio	Direct response: This information is not disclosed within the scope of public reporting.	
	2-22 Statement on sustainable development strategy	Chair of the Board's Message; CEO's Message; Our Strategy and Materiality Topics; Our Contribution to the Sustainable Development Goals	11, 12, 23, 115
	2-23 Policy commitments	Policies and Approaches; Our Ethics and Compliance Approach; Value Chain Management	113, 50, 81
	2-24 Embedding policy commitments	Policies and Approaches; Corporate Governance and Our Sustainability Governance; Our Ethics and Compliance Approach	113, 39, 50
	2-25 Processes to remediate negative impacts	Our Double Materiality Assessment; Risks, Opportunities and Resilience; Our Ethics and Compliance Approach; Value Chain Management	28, 35,50, 81
	2-26 Mechanisms for seeking advice and raising concerns	Our Ethics and Compliance Approach	50
	2-27 Compliance with laws and regulations	Our Ethics and Compliance Approach; Corporate Governance and Our Sustainability Governance	50, 39
	2-28 Membership associations	Memberships and Collaborations	111
	2-29 Approach to stakeholder engagement	Our Double Materiality Assessment; Creating Value With Our Stakeholders; Memberships and Collaborations	28, 53, 111
	2-30 Collective bargaining agreements	Odeabank does not have a workforce covered by collective bargaining agreements.	

GRI Standard	Disclosure	Report Section / Direct Response	Page No.
MATERIALITY TOPICS			
GRI 3: Material Topics 2021	3-1 Process to determine materiality topics	Our Double Materiality Assessment	28
	3-2 List of materiality topics	Our Double Materiality Assessment; Our Materiality Topics	28, 33
	3-3 Management of materiality topics	Our Strategy and Materiality Topics; KPI Map for Materiality Topics; Our Performance and Areas for Progress	23, 108, 105
ECONOMIC PERFORMANCE			
GRI 3: Material Topics 2021	3-3 Management of materiality topics	Strengthening Financial Resilience; Risks, Opportunities and Resilience; Our Performance and Areas for Progress	64, 35, 105
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	Our 2025 Performance Overview; Strengthening Financial Resilience; 2025 Performance Indicators	64, 100
	201-2 Financial implications and other risks and opportunities due to climate change	Risks, Opportunities and Resilience; Climate-Focused Transition Approach; Refer to the TSRS Compliant Sustainability Report	35, 74, 5
	201-4 Financial assistance received from government	There was no government financial assistance requiring disclosure during the reporting period.	
INDIRECT ECONOMIC IMPACTS			
GRI 3: Material Topics 2021	3-3 Management of materiality topics	Strengthening Financial Resilience; Accessible and Inclusive Banking; Social Impact and Community Investments	64, 66, 92
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	Social Impact and Community Investments; Strengthening Financial Resilience; Accessible and Inclusive Banking	92, 64, 66
	203-2 Significant indirect economic impacts	Social Impact and Community Investments; Strengthening Financial Resilience; Accessible and Inclusive Banking	92, 64, 66
PROCUREMENT PRACTICES			
GRI 3: Material Topics 2021	3-3 Management of materiality topics	Value Chain Management; Policies and Approaches	81, 113
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	Value Chain Management	82
ANTI-CORRUPTION			
GRI 3: Material Topics 2021	3-3 Management of materiality topics	Our Ethics and Compliance Approach; Corporate Governance and Our Sustainability Governance	50, 39
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	Our Ethics and Compliance Approach; Risks, Opportunities and Resilience	50, 35
	205-2 Communication and training about anti-corruption policies and procedures	Our Ethics and Compliance Approach; Policies and Approaches	50, 113
	205-3 Confirmed incidents of corruption and actions taken	Our Ethics and Compliance Approach	50

GRI Standard	Disclosure	Report Section / Direct Response	Page No.
ANTI-COMPETITIVE BEHAVIOR			
GRI 3: Material Topics 2021	3-3 Management of materiality topics	Our Ethics and Compliance Approach; Policies and Approaches	50, 113
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust and monopoly practices	Our Ethics and Compliance Approach; Social Performance Indicators	50, 100
ENERGY			
GRI 3: Material Topics 2021	3-3 Management of materiality topics	Operational Environmental Impact; Energy Management and Efficiency	78, 76
GRI 302: Energy 2016	302-1 Energy consumption within the organization	Operational Environmental Impact; Energy Management and Efficiency; Environmental Performance Indicators	78, 76,97
	302-3 Energy intensity	Environmental Performance Indicators; Our Performance and Areas for Improvement	97, 105
	302-4 Reduction of energy consumption	Operational Environmental Impact; Energy Management and Efficiency	78, 76
WATER AND EFFLUENTS			
GRI 3: Material Topics 2021	3-3 Management of materiality topics	Operational Environmental Impact; Energy Management and Efficiency	78, 76
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	Operational Environmental Impact; Environmental Performance Indicators	78, 99
	303-3 Water withdrawal	Environmental Performance Indicators	99
	303-5 Water use	Environmental Performance Indicators	99
EMISSIONS			
GRI 3: Material Topics 2021	3-3 Management of materiality topics	Operational Environmental Impact; Climate-Focused Transition Approach; Our Performance and Areas for Improvement	78, 74, 105
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Operational Environmental Impact; Environmental Performance Indicators	78, 97, 98
	305-2 Energy indirect (Scope 2) GHG emissions	Operational Environmental Impact; Environmental Performance Indicators	78, 97, 98
	305-3 Other indirect (Scope 3) GHG emissions	Operational Environmental Impact; Environmental Performance Indicators	78, 97
	305-5 Reduction of GHG emissions	Operational Environmental Impact; Energy Management and Efficiency; Our Performance and Areas for Progress	78, 76, 105

GRI Standard	Disclosure	Report Section / Direct Response	Page No.
WASTE			
GRI 3: Material Topics 2021	3-3 Management of materiality topics	Operational Environmental Impact; Energy Management and Efficiency	78, 76
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	Operational Environmental Impact; Environmental Performance Indicators	78, 97
	306-2 Management of significant waste-related impacts	Operational Environmental Impact; Environmental Performance Indicators	78, 97
	306-3 Waste generated	Environmental Performance Indicators	97
	306-5 Waste directed to disposal	Environmental Performance Indicators	97
EMPLOYMENT			
GRI 3: Material Topics 2021	3-3 Management of materiality topics	Empowering Talent; Employee Experience, Health and Well-being	85, 90
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Employee Experience, Health and Well-being; Social Performance Indicators	90, 101, 102
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Employee Experience, Health and Well-being	90
	401-3 Parental leave	Employee Experience, Health and Well-being; Social Performance Indicators	90, 103
OCCUPATIONAL HEALTH AND SAFETY			
GRI 3: Material Topics 2021	3-3 Management of materiality topics	Employee Experience, Health and Well-being	90
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Employee Experience, Health and Well-being	90
	403-2 Hazard identification, risk assessment, and incident investigation	Employee Experience, Health and Well-being	90
	403-5 Worker training on occupational health and safety	Employee Experience, Health and Well-being; Social Performance Indicators	90, 103
	403-8 Workers covered by an occupational health and safety management system	Employee Experience, Health and Well-being	90
	403-9 Work-related injuries	Employee Experience, Health and Well-being; Social Performance Indicators	90, 103
	403-10 Work-related ill health	Employee Experience, Health and Well-being; Social Performance Indicators	90, 103

GRI Standard	Disclosure	Report Section / Direct Response	Page No.
TRAINING AND EDUCATION			
GRI 3: Material Topics 2021	3-3 Management of materiality topics	Empowering Talent	85
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	Empowering Talent; Social Performance Indicators	85, 100
	404-2 Programs for upgrading employee skills and transition assistance programs	Empowering Talent; Employee Experience, Health and Well-being	85, 90
DIVERSITY AND EQUAL OPPORTUNITY			
GRI 3: Material Topics 2021	3-3 Management of materiality topics	Diversity, Equity and Inclusion	88
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Diversity, Equity and Inclusion; Corporate Governance and Our Sustainability Governance; Social Performance Indicators	88, 39, 100
NON-DISCRIMINATION			
GRI 3: Material Topics 2021	3-3 Management of materiality topics	Diversity, Equity and Inclusion; Our Ethics and Compliance Approach	88, 50
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	Diversity, Equity and Inclusion; Our Ethics and Compliance Approach; Social Performance Indicators	88, 50, 104
LOCAL COMMUNITIES			
GRI 3: Material Topics 2021	3-3 Management of materiality topics	Social Impact and Community Investments	92
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	Social Impact and Community Investments; Social Performance Indicators	92, 104
	413-2 Operations with significant actual and potential negative impacts on local communities	Risks, Opportunities and Resilience; Environmental and Social Risk Management in Lending Operations; Value Chain Management	35, 37, 81
CUSTOMER PRIVACY			
GRI 3: Material Topics 2021	3-3 Management of materiality topics	Data Security and Cyber Resilience; Our Ethics and Compliance Approach	62, 50
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Data Security and Cyber Resilience; Our Ethics and Compliance Approach	62, 50

Materiality Topic	Relevant GRI Disclosure	Report Section / Direct Response	Page No.
ORGANIZATION-SPECIFIC MATERIALITY TOPICS			
Financing the Low-Carbon Economy	GRI 3-3 Management of materiality topics	Financing the Transition to a Low-Carbon Economy; Climate-Focused Transition Approach; Our Strategy and Materiality Topics; Strengthening Financial Resilience; Our Responsible Products and Services	70, 74, 23, 64, 73
Cybersecurity and Data Security	GRI 3-3 Management of materiality topics	Data Security and Cyber Resilience; Policies and Approach	62, 114
Digital Transformation	GRI 3-3 Management of materiality topics	Digitalized and Enhanced Customer Experience; Strengthening Financial Resilience	56, 64
Responsible Products and Services	GRI 3-3 Management of materiality topics	Responsible Products and Services; Financing the Transition to a Low-Carbon Economy; Accessible and Inclusive Banking	73, 70, 66
Customer Experience	GRI 3-3 Management of materiality topics	Digitalized and Enhanced Customer Experience; Accessible and Inclusive Banking	56, 66
Financial and Digital Literacy	GRI 3-3 Management of materiality topics	Strengthening Financial Resilience; Social Impact and Community Investments	64, 92
Financial Inclusion	GRI 3-3 Management of materiality topics	Accessible and Inclusive Banking; Strengthening Financial Resilience	66, 64
Environmental and Social Risk Management	GRI 3-3 Management of materiality topics	Risks, Opportunities and Resilience; Environmental and Social Risk Management in Lending Operations; Value Chain Management	35, 37, 81

2025 SUSTAINABILITY PHOTO CONTEST WINNERS

ERÇE OĞUZHAN ERDEM

Sunlight filtering through the trees whispers of nature's quiet power to renew itself each day. Sustainability does not always begin with grand projects; sometimes, it begins in a heart that can look upon the soil, the trees, and the light streaming down from the sky with respect.

Cemal Güngör Park, *İstanbul*

odeabank

BUKET BALTACI

This canyon, shaped over decades by the high-volume water flowing through the valley, eroding the rocks to form deep pools, waterfalls, and caves, takes its name from the word Orrido, meaning "frightening" or "terrifying." This awe-inspiring yet formidable force of nature whispers a message to us: "Over time, water wears away even the hardest rocks in its path. Building a sustainable future likewise requires patience, determination, and continuity.

Orrido di Bellano, *Italy*

CİHAN KAAN GAZİ

In Córdoba's ancient Andalusian courtyards, walls bloom and stones breathe. In these patios, the open courtyards at the heart of the home entrusted to humanity by UNESCO, sustainability has endured for centuries. It lives on in a flowerpot lovingly watered by a grandfather and in the quiet care passed down to a grandchild.

The Courtyards of Cordoba, *Spain*

EZGİ KÜÇÜKÜNSAL

This photograph, taken during a visit to Çekerek, symbolizes how wind, an invisible force, can be transformed into energy that supports life without harming nature. This transformation strengthens my belief in a sustainable future with each passing day.

Wind of Çekerek, *Yozgat*

GÖKÇEN KOLÇAK

During a walk along Florya Beach, I wanted to capture that delicate and fragile balance found in nature. The sunlight filtering through the opening in the middle of the leaf and the sea stretching across the horizon bring together, in a single frame, nature's fragility and its endless continuity. This image reminds us that the gaps that emerge in nature are not a loss, but a natural part of the process of sustainable transformation.

Florya Beach, *İstanbul*

AYŞE AKSOY

This photograph, taken as we planted flowers with our colleagues in the garden of our branch during the lunch break, symbolizes both how meaningfully we used our time and the genuine harmony we share with nature as an organization.

Garden of Yeşilyurt Branch, *İstanbul*

HİLAL GÖRKEM ARCAN

The message conveyed by this photograph, taken in the printer area of our branch, is simple yet powerful: "What comes from the earth returns to the earth." It offers a quiet but meaningful reminder of paper's journey through nature and the importance of recycling.

Yeşilyurt Branch, *İstanbul*

AÇELYA YILDIRIM KARACA

As I photographed this little companion, adorned with nature's most delicate colors, I found myself imagining a future in which we leave behind not only a smaller carbon footprint, but also these vivid colors for the generations to come. Sustainability is our responsibility to protect these singular beauties that nature gently whispers to our hearts.

Tropical Butterfly Garden,
Konya

MUHAMMED TOKU

The solar energy system installed on the roof of our Ataşehir branch shines like a green signature amid the dense urban landscape. Implemented in line with our Bank's sustainability vision, this initiative symbolizes our commitment to reducing our environmental impact by increasing the use of renewable energy.

Ataşehir Branch SPP,
İstanbul

MÜGE İŞTEBEN

"One Drop, One Life." Through this image, where a single drop of water sustains an entire life, I wanted to show that protecting nature begins with the smallest of steps. Every drop of water that gives life to nature is the most precious legacy we can leave to the future with care and love.

İstanbul

HİLAL UÇURUM TUNCAY

Nature adapts to every circumstance and continues to thrive with quiet strength." This image, defying the harshest conditions, reveals nature's remarkable ability to preserve its balance and endure.

Ovacık Nature, *Tunceli*

REPORTING GUIDE

At Odeabank, we regard sustainability reporting not merely as an annual performance disclosure, but as a management tool that supports data quality, corporate accountability, strategic decision-making, and transparent communication with our stakeholders.

Accordingly, the environmental, social, governance and economic performance indicators included in our 2025 Sustainability Report have been prepared in line with our sustainability materiality topics, national and international reporting frameworks, applicable legislation, stakeholder expectations, and the Bank's internal data management processes.

This section summarizes the key data collection, consolidation, control and reporting approach applied in preparing our voluntarily published 2025 Sustainability Report.

REPORTING SCOPE

Unless otherwise stated, this report covers the sustainability performance of Odeabank and its subsidiary Odeatech for operations conducted in Türkiye between 1 January 2025 and 31 December 2025.

Depending on the nature of each dataset, indicators presented in this report may be disclosed at the Odeabank, Odeatech or consolidated level. Where reporting boundaries differ, explanatory notes are provided under the relevant indicator or within the respective section.

Our disclosures prepared in accordance with the TSRS are published separately. This voluntary Sustainability Report complements our TSRS reporting by providing a more comprehensive overview of the Bank's sustainability strategy, materiality topics, performance, practices, and the value we create for our stakeholders.

DATA COLLECTION AND CONSOLIDATION PROCESS

The sustainability reporting process is coordinated by the Sustainability Department. Reported indicators are consolidated based on datasets and supporting information prepared by the responsible business units. The following approach is applied throughout the data collection process:

DATA CATEGORIES

The principal data categories covered by this report are presented below:

Data Category	Scope
Environmental Performance	Energy consumption, renewable electricity, greenhouse gas emissions, water consumption, waste management and resource efficiency indicators
Social Performance	Workforce, diversity, training, talent management, employee experience, occupational health and safety, and social impact indicators
Governance Performance	Corporate governance, sustainability governance, ethics and compliance, risk management, information security and data privacy indicators
Economic Performance	Financial indicators, direct economic value generated and distributed, sustainable finance, and responsible products and services performance
Customer and Digitalization Indicators	Digital customer experience, customer satisfaction, complaint management, accessible banking and financial literacy indicators

The following approach is followed in the data collection process:

1. Reporting indicators are determined by considering the Bank's materiality topics, the GRI Standards, the UN Global Compact, WEPs, CDP, PCAF, and internationally recognized ESG assessment frameworks.
2. A responsible data owner and business unit are assigned for each indicator.
3. Data are collected from the relevant business units using predefined reporting templates.
4. Where necessary, supporting documentation, system extracts, calculation files or methodological notes are requested.
5. The Sustainability Department reviews all reported data for completeness, consistency, year-on-year comparability and alignment with the overall report narrative.
6. Additional confirmation is obtained from relevant business units for critical indicators where required.
7. Any identified inconsistencies, boundary differences or methodological changes are jointly assessed with the relevant departments and clarified before reporting.

CALCULATION AND PRESENTATION PRINCIPLES

Where possible, indicators are presented on an annual basis together with comparative historical data. Consistency in reporting boundaries and calculation methodologies is maintained to support comparability across reporting periods.

Where significant changes occur in reporting scope, methodology or data sources, the impact on comparability is assessed and explanatory notes are provided alongside the relevant indicator where appropriate.

ENVIRONMENTAL INDICATORS

Energy consumption, renewable electricity, greenhouse gas emissions, water consumption and waste management indicators are reported based on operational records, invoices and meter readings, service provider records, renewable energy certificates, and information provided by the relevant business units.

Greenhouse gas emissions are calculated by considering Scope 1, Scope 2, and, where reliable data are available, the relevant Scope 3 categories. Scope 1 emissions comprise direct emissions arising from the Bank's operations, while Scope 2 emissions relate to indirect emissions resulting from purchased electricity consumption.

Where appropriate data are available, Scope 2 emissions are assessed using both location-based and market-based methodologies. Certified renewable electricity procurement or matching mechanisms are incorporated into market-based calculations where applicable.

Sustainable Finance and Responsible Products

Indicators relating to sustainable finance and responsible products are reported by considering the purpose of the relevant products, customer segments, financing volumes, intended use of proceeds and project types.

These data are derived from product, loan and portfolio information provided by the relevant business units. Product scope, eligibility criteria and classification methodologies are confirmed by the responsible business units, and reporting is prepared accordingly for the reporting period.

Employee Data

Employee-related data are reported based on Human Resources records as of the end of the reporting period. Information including workforce size, gender, age group, job level, recruitment, employee turnover, promotions, training and similar indicators is compiled from the Bank's human resources systems and learning platforms.

Employee turnover is calculated based on the number of employees leaving the Bank during the reporting period relative to the workforce size for the relevant period. Training hour disclosures include completed online and classroom-based training recorded in the relevant learning management systems. Whether occupational health and safety training or other specialized training categories are included in total training hours is specified, where applicable, within the relevant performance indicator.

Occupational Health and Safety

Occupational health and safety indicators are reported based on applicable legislation, internal records, incident reports, Occupational Health and Safety Committee records, and training data. Indicators relating to workplace injuries, lost-time incidents, occupational diseases, fatalities and occupational health and safety training are compiled using records maintained by the responsible departments.

Ethics, Compliance and Financial Crime Prevention

Indicators relating to ethics, compliance, anti-corruption, anti-money laundering and the prevention of financial crime are reported based on records maintained by the Compliance function and other relevant control functions.

Data relating to ethics notifications, violations, investigations, disciplinary actions, training and awareness activities are monitored through the relevant systems, reporting channels and training records. Reported information is limited to notifications and incidents recorded during the reporting period.

Customer Experience and Digitalization

Customer experience indicators include customer satisfaction, NPS, number of complaints, resolution times, digital channel usage, accessibility practices and contact center performance. These data are compiled from customer experience systems, digital channel records, contact center reports and customer surveys.

Customer satisfaction and NPS results are assessed based on the relevant measurement period, sampling methodology and reporting scope. Digital customer and transaction data are reported according to the applicable definitions and measurement methodologies.

Community Impact and Social Investments

Our social impact and social investment performance is monitored through indicators such as project budgets, the number of people reached, direct and indirect beneficiaries, event participants, the number of materials distributed, and outreach metrics.

Direct beneficiaries refer to individuals who directly participate in a project or activity or directly benefit from its outputs. Indicators relating to indirect reach or media exposure are calculated using project communication channels, publications, digital platforms or third-party reporting. Accordingly, where possible, a distinction is made between direct beneficiaries and total reach when presenting social impact data.

DATA QUALITY AND CONTROL APPROACH

The reliability of sustainability data is supported through data ownership by the relevant business units, consolidation and consistency reviews conducted by the Sustainability Department, comparative analyses and, where necessary, requests for supporting documentation.

EXTERNAL ASSURANCE AND RELATIONSHIP WITH THE TSRS COMPLIANT SUSTAINABILITY REPORT

Odeabank's sustainability disclosures prepared in accordance with the TSRS are published as a separate report and are subject to limited assurance within the scope and reporting boundaries specified therein. This voluntary Sustainability Report has been prepared separately from the TSRS Compliant Sustainability Report and has not been subject to independent external assurance as a whole. Nevertheless, disclosures related to indicators that are included within the scope of the TSRS limited assurance engagement have been prepared by taking into consideration the relevant assurance procedures and the methodological approach adopted in the TSRS Compliant Sustainability Report.

Performance indicators included in this report that fall outside the scope of limited assurance are reported based on declarations provided by the relevant data owners, system records, supporting documentation and internal control processes.

Looking ahead, Odeabank aims to assess the expansion of external assurance to selected sustainability indicators as part of its ongoing efforts to enhance data quality and reporting maturity.

LIMITATIONS AND CONTINUOUS IMPROVEMENT

Sustainability reporting is a dynamic process involving numerous business units, data sources and calculation methodologies. Certain indicators may be subject to limitations arising from reporting boundaries, system infrastructure, measurement methodologies or third-party data availability.

Accordingly, the Bank seeks to further strengthen methodologies and improve data quality in emerging reporting areas, particularly Scope 3 greenhouse gas emissions, financed emissions, supplier-related environmental and social impacts, social impact measurement, and portfolio-based climate metrics.

DATA APPROACH

Our data quality approach is based on the following principles:

Principle	Description
Accuracy	Data are verified against the relevant systems, records, invoices, reports or confirmations provided by the responsible business units.
Consistency	Data are assessed for consistency with previous reporting periods, the related narrative sections and performance indicators presented throughout the report.
Comparability	Changes in reporting boundaries and methodologies are considered when presenting year-on-year comparisons.
Traceability	For materiality indicators, the data source, responsible business unit and calculation methodology are documented and traceable.
Transparency	Explanatory disclosures are provided where reporting boundaries, assumptions or limitations apply.

As Odeabank, we are committed to making our sustainability reporting increasingly measurable, comparable, and decision-useful each year. To support this objective, we aim to:

- Further strengthen the systematic monitoring of KPI sets associated with our materiality topics,
- Enhance data ownership and internal control mechanisms,
- Evaluate the expansion of external assurance to selected sustainability indicators,
- Further mature sustainable finance, PCAF, CDP and portfolio-based climate data,
- Improve the measurement of social impact through clearer differentiation between output and outcome indicators,
- Strengthen the systematic collection of supplier and value chain data,
- Support reporting processes through digital data management solutions.

Through this approach, we will continue to present our sustainability performance in a manner that is increasingly transparent, traceable, and decision-useful for our stakeholders.

You can visit our Turkish Glossary of Terms to explore the sustainability terms used throughout this report.

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LEGAL DISCLAIMER

The Odeabank 2025 Sustainability Report has been prepared to transparently communicate the Bank's sustainability approach, practices, and performance for the period 1 January–31 December 2025 to its stakeholders.

The report has been prepared in line with the principles of integrated thinking, taking into consideration the GRI Standards, internationally recognized best practices, and investor-oriented sustainability reporting approaches.

The information contained in this report reflects the data available and internal assessments made as of the publication date. Certain statements contained herein may include forward-looking assessments, assumptions and estimates. The financial, operational, and ESG indicators presented in this report relate solely to the reporting period and may change over time due to macroeconomic developments, regulatory changes or revisions to the Bank's corporate strategy.

This report has been prepared solely for informational purposes and does not constitute investment advice, an offer, or any form of commitment.

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Our report has only been published online.

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