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1. Purpose

The purpose of this Policy is to establish diversity, equity, and inclusion principles as a core part of Odeabank's corporate culture and to provide a fair, respectful, safe and inclusive environment for all employees, customers, business partners and stakeholders.

The Bank recognizes diversity as a strategic advantage, equity as one of the fundamental elements of sustainable growth, and inclusion as an approach that strengthens employee engagement, innovation and long-term organizational resilience.

The Bank implements its diversity, equity and inclusion approach in line with the principle of respect for human rights and with due consideration of applicable national legislation and international good practices. This Policy has been prepared with reference to international frameworks such as the United Nations Global Compact (UN Global Compact), the United Nations Women's Empowerment Principles (WEPs), the core labour principles of the International Labour Organization (ILO), and the OECD Guidelines for Multinational Enterprises.

2. Scope

This Policy applies to all employees, managers, business partners, customers, suppliers and all other stakeholders of the Bank.

This Policy forms the basis of all business processes, including recruitment, remuneration, career development, promotion, training, performance evaluation, employee benefits, procurement, supplier relations as well as product and service development.

The Bank aims to ensure that its diversity, equity and inclusion approach is reflected not only in its corporate culture but also in its customer experience, digital channels, financial inclusion practices and supply chain processes.

3. Related Legal Regulations

4. Policy

4.1 Diversity

Diversity refers to the presence of individuals with different backgrounds, cultures, experiences, perspectives and demographic characteristics, and to the recognition of these differences as a source of value. The Bank considers the various dimensions of diversity, including age, gender, disability status, educational background, experience, cultural diversity, socio-economic background and different perspectives, as potential value for organizational development.

Diversity is recognized as a strategic value that strengthens decision-making processes, supports innovation, increases employee engagement and contributes to sustainable success. The Bank believes that an inclusive working culture that encourages different perspectives also supports long-term organizational resilience.

The Bank also aims to promote an approach that supports diversity within its talent management processes. In this regard, it supports the implementation of practices in recruitment and talent management processes that promote diversity, strengthen equal opportunity and are based on the evaluation of candidates' knowledge, competencies and experience through objective criteria. Through the use of structured interview methods in recruitment processes, evaluations are intended to be conducted within a consistent, comparable and objective framework. Through artificial intelligence-supported assessment practices used in young talent recruitment, the Bank aims to reduce personal biases and support a more inclusive evaluation approach. The Bank supports the diversification of job posting and candidate sourcing channels in order to increase access to diverse talent pools. This diversification aids in reaching candidates with different educational backgrounds, experiences and profiles. In order to support the sustainability of diversity within the organizational structure, the ratio of female employees, female representation at management levels, the ratio of employees with disabilities or any other relevant diversity indicators are regularly monitored and evaluated. In career and talent management practices, promotion and potential assessment processes are conducted based on transparent, consistent, and measurable criteria.

4.2 Equity

The Bank aims to support the fair access of all individuals to opportunities, resources, development opportunities and decision-making processes. This approach recognizes that individuals may have different needs and starting conditions and is based on the development of practices that strengthen equal opportunity.

One of the most fundamental elements of equity is the achievement of gender equality. Gender equality refers to women and men having equal access to opportunities, resources, rights, and services. This is regarded as one of the important components of sustainable economic and social development. The Bank aims to support the empowerment of women in business life, their increased representation in decision-making processes and the enhancement of their financial inclusion.

The Bank aims to uphold an equal opportunity approach in recruitment, remuneration, career development, promotion, training, performance evaluation and employee benefits processes. A zero-tolerance approach is adopted against discrimination, exclusionary practices, harassment and mobbing. In order to support the principles of equal pay for equal work, it is essential that fair, consistent, and objective criteria are applied in remuneration processes. Within this scope, pay equity analyses or related indicators are monitored and areas for improvement that could strengthen equal opportunity are evaluated.

The Bank aims to support the integration of its equity approach throughout its employee experience, leadership culture, and talent management processes.

4.3 Inclusion

Inclusion refers to an organizational culture in which every individual feels valued, respected and accepted. Inclusion is a natural complement to diversity and equality policies; it aims to create an environment where differences can be expressed safely, contributions are valued, and everyone sees themselves as an integral part of the organization.

The Bank aims to foster an inclusive working and service environment where the differences of its employees, customers and all stakeholders are respected, and where individuals can feel safe and valued. A safe and inclusive working environment is supported, enabling employees to express their views freely.

The Bank ensures an environment in which all employees and stakeholders are not subject to discrimination on the basis of any individual characteristic, including but not limited to gender, age, ethnic origin, physical abilities, socio-economic background, belief system or sexual orientation. Increasing the participation of persons with disabilities and other disadvantaged groups in the workforce, improving accessibility standards and implementing policies that support equal opportunity are also part of this commitment.

The Bank observes equal opportunity in recruitment and promotion processes, implements training programs to develop employees' inclusive leadership competencies, and takes diversity and inclusion objectives into consideration in performance evaluations. The Bank aims to support the development of an inclusive leadership culture.

Within the scope of the "Regulation on the Accessibility of Banking Services" published by the Banking Regulation and Supervision Agency and the Presidential Circular on the "Accessibility of Websites and Mobile Applications," the Bank encourages the development of practices that support physical and digital accessibility, and aims to develop inclusive solutions that facilitate access to financial services for individuals with different needs.

The Bank organizes training programs to increase the awareness and knowledge of its employees and business partners on accessibility.

The Bank conducts experience research on the access of persons with disabilities to physical and digital services. Based on the findings of these studies, the Bank identifies areas for improvement, considers the needs of disadvantaged groups in the products and services it offers to customers, and develops financial solutions that enhance social benefit.

4.4 Supporting Practices

Equal opportunity is observed throughout the recruitment and promotion processes. Inclusive leadership training programs are provided and the integration of the diversity, equity and inclusion principles into human resources processes is supported.

Support is provided through the Internal Whistleblowing Line, through which all employees may report potential violations. Confidentiality and non-retaliation principles are observed throughout reporting processes.

The Bank encourages training and development practices that support employee engagement, a more inclusive corporate culture, and diversity awareness. Within this scope, the provision of training programs supporting the diversity, equity and inclusion approach to employees and the monitoring of participation rates in such training programs are supported. Participation data relating to existing training programs on relevant topics within the Bank may be reported where needed. Training content relating to awareness areas such as gender equality is considered among the development tools that strengthen employees' contribution to an inclusive corporate culture.

The needs of disadvantaged groups are taken into consideration in the products and services offered to customers.

The Bank expects its business partners and suppliers to demonstrate an approach aligned with the principles of human rights, equal opportunity, non-discrimination and inclusion. In this regard, it is essential that supplier relationships are conducted in compliance with Article 4.3.2 (Discrimination) of the Odeabank Supplier Code of Conduct Policy PL-053. The Bank expects its suppliers to act in accordance with principles aimed at preventing discrimination, ensuring equal opportunity, and supporting an inclusive business culture.

Women entrepreneurs, businesses supporting persons with disabilities, and SMEs are supported in the supplier selection processes.

4.5 Implementation and Responsibilities

The Corporate Governance and Sustainability Committee is responsible for the implementation and oversight of this Policy. Relevant units, particularly Human Resources, support the implementation, enhancement, and integration of the practices covered by this Policy into relevant processes.

The Bank encourages the integration of the diversity, equity, and inclusion approach into its corporate culture, employee experience, talent management, customer experience, accessibility practices, financial inclusion initiatives, and supply chain processes. The effectiveness of this approach shall be monitored and assessed using material diversity, equity and inclusion indicators aligned with the objectives of this Policy, as determined by the relevant functions. Such indicators are evaluated by the relevant units and may be used in reporting processes where needed.

Practices implemented within the scope of this Policy are periodically reviewed in line with applicable legislation, national and international good practices, stakeholder expectations, and the sustainability approach. It is aimed to identify areas for improvement, strengthen existing practices, and review relevant processes where necessary.

This Policy is reviewed at least once a year and updated where necessary.

5. Update History

Document Owner		Sustainability	
Related Departments		Compensation, Benefits and HR Operations, Learning and Development Management, Corporate Communications and Marketing, Procurement, Sustainability Working Group	
Update History			
Version No	**Date of Publishing**	**Type of Change***	**Explanation**
1	14.09.2026	New	The Policy has been established to support the integration of diversity, equity and inclusion into the corporate culture. Within the scope of the Policy, approaches to human rights, equal opportunity, accessibility, inclusive corporate culture and financial inclusion have been defined; and relevant national legislation as well as international good practice frameworks, including the UN Global Compact, WEPs, ILO and OECD, have been taken into consideration.

*Type of Change = New, Addition, Cancellation, Update, Review.