

DIVERSITY,
EQUITY AND
INCLUSION
POLICY





Organizational

Development Divison

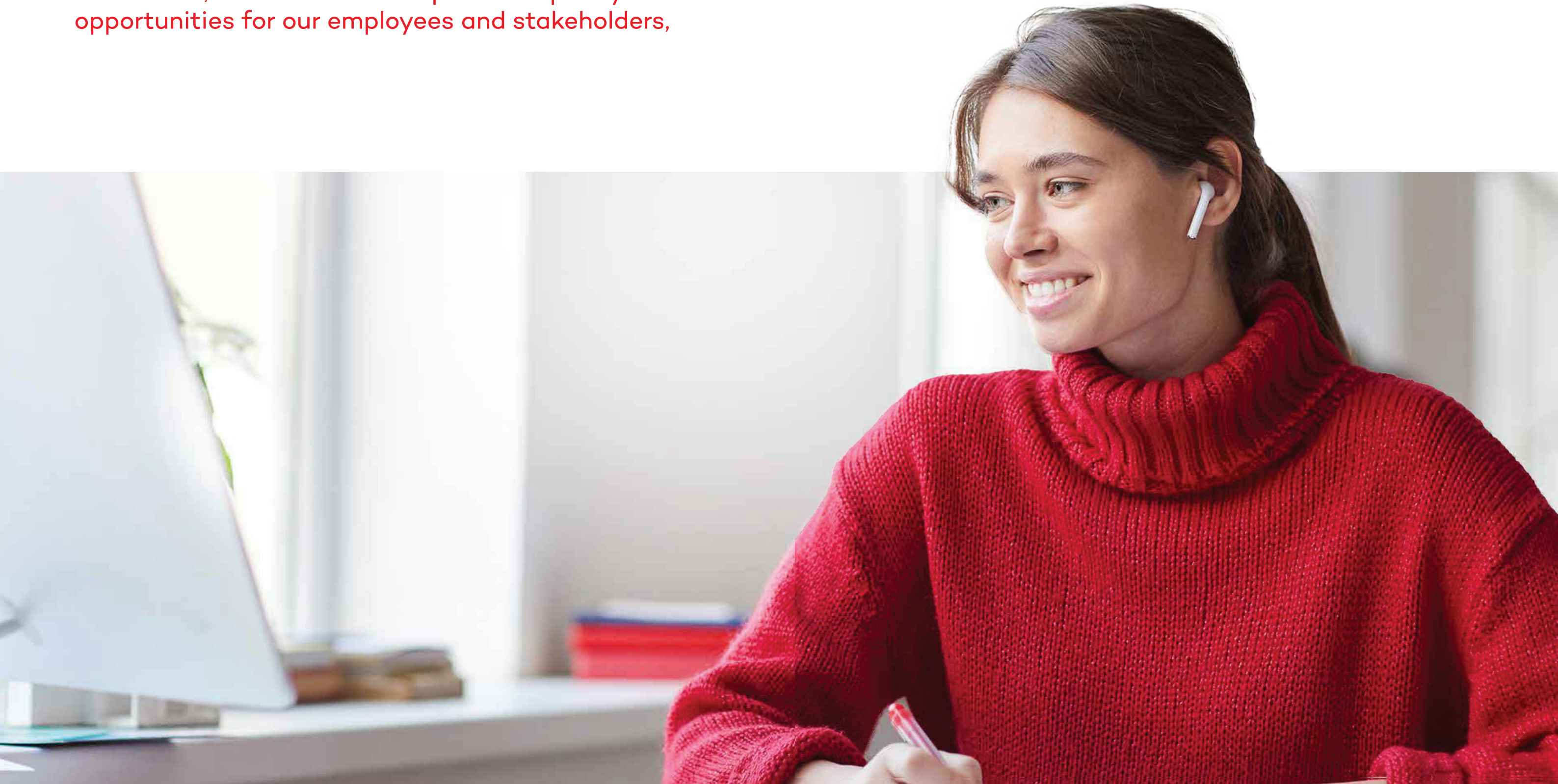
INDEX

1. PURPOSE	2
As Akbank, we have aimed to provide equality in opportunities for our employees and stakeholders, to support vulnerable and create an organization wide awareness culture, and adaptation of supportive policies.	
2. SCOPE	2
3. RESPONSIBILITIES	2
4. DESCRIPTION OF DIVERSITY, EQUITY AND INCLUSION	2
5. SOURCES	2
6. DIVERSITY, EQUITY AND INCLUSION WITHIN AKBANKER CULTURE	3
6.1. PRINCIPLES OF DIVERSITY, EQUITY AND INCLUSION	4
6.1.1. Equal Opportunities	4
6.1.2. Support of groups affected by inequalities	4
6.1.3. Societal Gender Equality	4
7. WORKPLACE, WORK HEALTH AND SECURITY	5
8. DIVERSITY, EQUITY AND INCLUSION IN CUSTOMER ACTIVITIES	8
9. DIVERSITY, EQUITY AND INCLUSION FROM THE PROCUREMENT PROCEDURES	8
10. DIVERSITY, EQUITY AND INCLUSION IN SOCIAL INVESTMENT PROJECTS	9
11. DIVERSITY, EQUITY AND INCLUSION IN SOCIAL INVESTMENT PROJECTS	9
11.1. MONITORING AND FOLLOW-UP APPROACH	10
11.1.1. MONITORING INDICATORS	10
11.1.2. Monitoring Indicators for Supporting Vulnerable Groups and Gender Equality	10
11.1.1. Follow-up Indicators for Awareness Activities	10
11.1.2. Monitoring Indicators for Procurement Activities	11
11.1.3. Monitoring Indicators for Social Investment Activities	11
11.1.4. MEASUREMENT AND REPORTING METHODS	11

1. PURPOSE

to support vulnerable and create an organization wide awareness culture, and adaptation of supportive policies.

As Akbank, we have aimed to provide equality in opportunities for our employees and stakeholders,



2. SCOPE

It includes every Akbank employee, our business partners and communities within society that we aim to effect via social contributions.



Principles regarding the following topics have been set in this document:

- Diversity, Equity and Inclusion in Akbank Culture
- Diversity, Equity and Inclusion in Our Customer Services
- Work Environment, Workplace Health and Safety
- Diversity, Equity and Inclusion in Procurement Processes
- Diversity, Equity and Inclusion in Social Investment
- Observing and Tracking Diversity, Equity and Inclusion

The policy document is drafted yearly and is updated if it's necessary. Following the update, the necessary teams are notified to make the adequate adjustments and the updates are tracked.

3.RESPONSIBILITIES

Drafter :

Organizational Development Division

Feedback by :

Career Development Division, Akbanker
Experience and Academy Division, Investor
Relations and Sustainability Division,
Procurement Division, Compliance Divison,
Internal Control Divison, Brand and
Communications Office

Approved by :

Board Of Directors

Published by :

Organizational Development Division

Can be used by :

All Akbank employees, candidates and all
societal groups





4. DESCRIPTION OF DIVERSITY, EQUITY AND INCLUSION

Diversity generally encompasses race, gender, belief, religion, ethnicity, nation, political view, age, state of disability, marital status, sexual orientation, similar subjects. and all other differences.

Inclusion is acting on the concept and making use of the concept in practical use by creating an environment of respect and connection in which the richness of ideas, pasts and perspectives of all included are utilized to reach a common work value.₁

Some parts of the society which cannot benefit adequately or are deprived of from the basic economic, cultural and social resources are included under the umbrella term, “vulnerable groups.” Women, youth, individuals with disabilities and the long term unemployed are included under this term.

Equity recognizes that each person has different circumstances, that some people have historically experienced discrimination, and that equal outcomes cannot be achieved by treating everyone the same. Equity requires that resources and opportunities be allocated according to circumstances and needs.

5. SOURCES

Diversity, Equity and Inclusion policy has been prepared in consultation in application sources which including the regarding Akbank's policies and principles, legal regulations and other application sources released by international organizations



- Akbank's Policy and Code of Practice
 - Akbank Sustainability Strategy
 - Corporate Regulation Principles
 - Ethical Principles
 - Human and Culture Codes of Practice
 - Clean Banking Risk Management Policy
 - Humans Right Policy
 - Zero Tolerance Policy Towards Violence
 - Guide on Inclusive Language in Workplace
 - Board of Directors Diversity Policy
 - Akbank's Red Book
 - Supplier Code of Conduct
 - Artificial Intelligence Manifesto
 - Akbank E&S Risk Framework
- The principles and policies of International
 - United Nations Sustainable Development Goals
 - Goal 5: Societal Gender Equality
 - Goal 8: Decent Work and Economic Growth Goal
 - 10: Reduced Inequalities
 - Goal 10: Reducing Inequalities
 - United Nations Global Compact
 - Universal Declaration of Human Rights
 - Declaration on Fundamental Principles and Rights at Work
 - Women Empowerment Principles
 - ILO C190 Violence and Harassment Convention
- Related legal regulations

6. DIVERSITY, EQUITY AND INCLUSION WITHIN AKBANKER CULTURE

6.1. PRINCIPLES OF DIVERSITY, EQUITY AND INCLUSION

6.1.1. Equal Opportunities

As Akbank, we work with the vision of becoming the leading bank in the sustainability field. We know that equal opportunities will bring success; and together we will get to shape a fair and a happy future. In line with these beliefs, creating a workplace founded on equal opportunities and maintaining work sustainability is our goal.

Our main goal is for our employees and directors, who work in an inclusion culture, to learn from each other and improve under these goals, the following principles have been embraced:



- All individual characteristics like race, gender, belief, religion, ethnicity, nation, political view, age, state of disability, marital status, sexual orientation, are welcomed and cannot be used as merits or qualifiers in recruitment, performance assessment or promotion.
- In recruitment, performance assessment or promotion processes the main merits are the expertise and competency of our employees.
- An equal opportunity is achieved by releasing career opportunities via a platform which all of our employees can view and apply to simultaneously.
- In order to provide equal opportunities to all of our employees on topics that are based on gender like maternal plans and military service are not included in our assessment and evaluation criteria.
- The competence, development and career programs in Akbank; hand to hand with each of our employee's career maps and development needs and calculated over analytic big data. This is displayed with absolute clarity to our employees, to whom it provides equal chances. Moreover, the criteria for promotion and head of office with our employee's

positions are shared with our employees in full transparency. Regarding these criteria and from that information they can monitor and follow their career paths in transparency and continuously.

- Inside and outside the organization, in all of our training activities, a plane of equal opportunities is provided for all of our employees under the constant development principle.
- We follow equal pay for equal work principle in Akbank. The effects of the equality of opportunities principle and policy upon the side benefits are tracked and from a third party these values are studied to take precautions for any sorts of risks that might rise in these fields.
- Under our diversity, equity and inclusion policies and the proposition for employee values, our aim is to create values over the legal responsibilities that we provide for our employees and in the end, to create a value.
- When planning for work groups and activities, attendance from all different groups and different individual characteristics(age, gender, seniority) is promoted and watched out for in order to hear from everyone included.

6.1.2. Support of groups affected by inequalities

Under the light of our values, we support different ways of thinking and care for all groups regardless of race, gender, belief, religion, ethnicity, nation, political view, state of disability, marital status, sexual orientation similar subjects.

Within our policy for groups affected by inequalities “women,” “youth,” “individuals with disabilities,” “long term jobless people,” have been determined to fall under this term and the following principles have been imposed for their support.

- Extra development activities are carried out, going beyond legal responsibilities, to help groups affected by inequalities hold on better into the workload and for this movement to be supported
- The founding and generalization of groups in support of groups affected by inequalities is supported.
- Opportunities are created for candidates that are new to work life regardless of their gender, state of disability, age, similar subjects. and actions are taken for them to be able to fit into our work pace and integration to our system.



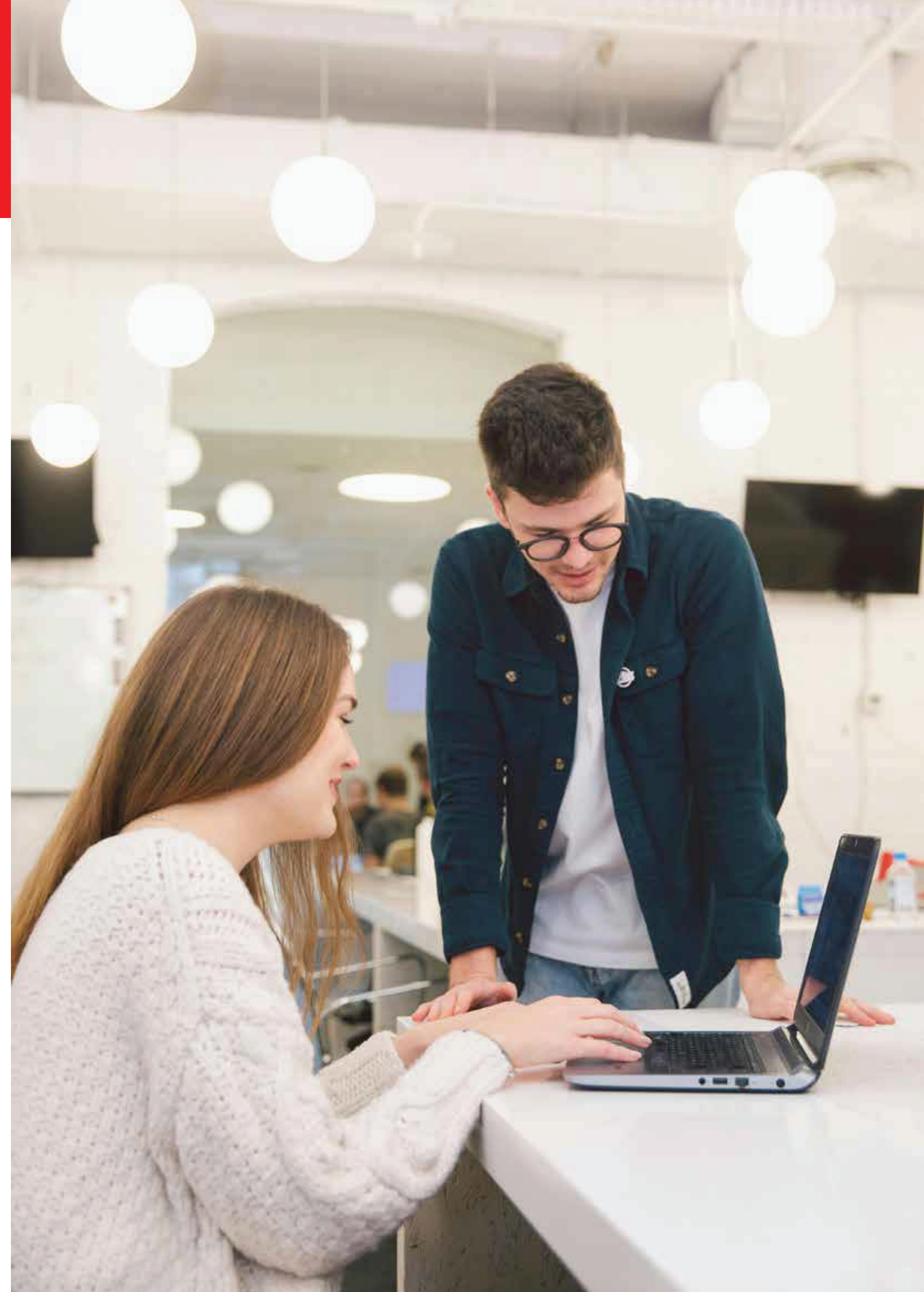


- The wellbeing of individuals who have become a groups affected by inequalities individual in the aftermath of natural disasters is supported and development projects are conducted to earn them back into the work life.
- To make life easier for individuals with disabilities the developments are followed and used to increase accessibility.
- Job postings are drafted and are open to all groups (if the job process does not cause any impediments to any special groups.) Any phrase that might suggest discrimination against individuals with disabilities (driving license, military service, health problems similar subjects.) are not mentioned in the job posting.
- Workplace health and safety are relieved and redrafted in alliance with the needs of our employees like women, pregnant women, individuals with disabilities and other groups whose needs might differ.
- Within Akbank and within teams the gender and age dispersion is tracked and in teams that don't follow these principles undergo a staff planning.

6.1.3. Societal Gender Equality

Certain targets regarding societal gender equality is being set up and the adequacy of new and already existing applications are evaluated within our societal gender equality policies.

- The process of hiring, performance assessment, training, promotion, payroll and side benefits, turnover processes all constantly are under the societal gender equality approach.
- Factors like marital status or having children or not do not affect the choice process regarding hiring or promotion. During job interviews women candidates cannot be asked questions their marriage or maternal plans.
- Regular measurements is carried out to determine barriers to the societal gender equality processes in Akbank and to create sustainable improvement. Under these sanctions, the candidate pools are utilized for roles like income generating roles, technology and digital roles as well as executive positions and precautions are taken to give women equal representation.



- We ensure that our women employees use their maternity leave to its full extent. Their laptop passwords are locked to prevent them from working during their maternity leave.
- By exceeding the legal rights, certain protocols are carried out for longer terms of paternity leave for male employees.
- Before and after maternity leave women employees get mentorship support to make their transitions easier.
- For employees with children in kindergarten or primary education, first day for beginning and last day for report ceremony are allowed to take the day off.
- All of our potential and current parents are in the aim of our social benefits, training and informing opportunities are encouraged to take part in regardless of their gender.
- After their maternity leave it is ensured that women employees are ensured to return to their prior status and standards.
- Employee needs like childcare, elderly care or ailing relative care are taken up regardless of societal gender factor and evaluated in the same way.
- We adopt the approach that both women and men are responsible for all kinds of care work, and we define paid compassionate leave for all our employees that can be used for up to 3 months beyond the legal limits, if needed.

- The payment data of Akbank employees have been evaluated by a third party organization in regards to equal pay for equal work and the concluded that within male and female employees of the same position there is no difference in payroll. The possible risks of this issue are always overseen and guarded. Providing the equal pay for equal work is tracked by the HR compensation and benefits teams annually.

6.2. INCLUSION ORGANISATION CULTURE AND AWARENESS

We strive to provide a working environment where our employees turn and have strong communication. In alliance with this goal, following principles have been carried out under the communication and awareness activities:

- All of our employees are supported with in organization trainings and via this an awareness is reached these trainings makes the inclusion culture more prevalent and thus enhances the decision mechanisms.

- Our diversity, equity and inclusion policy is shared with our candidates and employees and they're expected to adapt.

- During the orientation process, our diversity, equity and inclusion policies are put across to the new employees. The adaptation to diversity and culture is ensured by providing training under these goals.

- With the awareness of inclusion actions does not only fall under the responsibility of a certain team, all of Akbank from employees to leader's act in accordance with our culture in every step that interacts with the employees and candidates.

- All internal and external communication content is made to be a part of work carried under diversity, equity and inclusion.

- By creating a common language for communication, a more sensitive communication model that is sensitive to inclusion and away from stereotypical biases is supported within Akbank.

- A communication language and certain message drafts are created for the in organization diversity, equity and inclusion work.

- On days that focus on gender equality and the support of groups affected by inequalities like March 8 Women's Day, December 3 International Day of Persons with Disabilities, November 25 International Day for the Elimination of Violence Against Women, international awareness activates are carried out and these awareness activities with the attendance of the employees these kinds of activities are spread on other times of the year as well.

- By implementing leadership and mentorship programs the creation of role models for groups affected by inequalities are supported and certain mediums and portals are utilized for role models to share information and experience with other employees.

- Our ethical principles against sexual abuse, mobbing, direct or indirect discrimination, any form of verbal or physical violence and abuse create an awareness for these topics.

- Trainings are held to increase awareness regarding the description of verbal or physical discrimination, direct or indirect discrimination; what to do when facing these and the actions Akbank will take against those who carry these actions.

- The “Zero-Tolerance Support Line” which is for any of our employees who run into discrimination, mobbing, or violence to contact and report the unjust treatment they are facing is promoted regularly and any compliance is regarded with diligence and employees are supported.
- The Zero Tolerance Policy Towards Violence is carried to oversee the processes in the instance of facing any kind of violence in order to create a safe and supportive work environment for all of our employees and any conversation that might create awareness for this topic is carried out all across Akbank.
- The Child Development and Societal Gender Equality Guide prepared by everyone in Akbank serves as a new source available to all Akbank employees which highlights the importance of parents’ roles in being aware of the societal gender equality and undertaking the role of being conscious while raising children and tether effective suggestions; this source is shared with all new parent Akbank employees.
- Guide on Inclusive Language in Workplace is prepared for everyone in Akbank and it aims to create a structure in which every individual benefits the same from sources and opportunities, takes on equal roles, where the

balance is equated in decision making processes and the stereotypes are questioned via a language in which all the genders are represented equally. The prevalence of correct use of language in the workplace is communicated regularly.

- “Akbank’s Red Book” is a book written by the Akbank employees as a guide, which contains the culture constituents and behaviors, and this book is centralized. In order to generalize the sets of behaviors in this book communication channels and trainings are held with all of our employees as well as our new employees. Within these aforementioned behaviors are 19, some of which are; “We respect diversity and differences, care for cultural values and preferences,” “We believe in a multitude of voices not hierarchy, we know that different ideas carry us to right decisions,” “We pursue our wellbeing as humans.

6.3. THE ROLE AND APPROACH OF THE LEADERS

The utmost responsibility falls onto the leaders in order to all of the employees to accept and internalize the diversity, equity and inclusion policies as well as for the organization culture to be sustainable. The following

principles have been set to determine the roles and responsibilities of our leaders and to clarify their approaching principles: In the name of tracking Akbank's performance in diversity, equity and inclusion, and to initiate action in the light of tracking of this performance an Executive Vice President responsible for "Diversity, equity and Inclusion" is assigned.

- With the consciousness that the diversity, equity and inclusion is actually under the responsibility of every leader, this responsibility is attained to a different Executive Vice President every 2 years.

- The diversity, equity and inclusion goals are set as the stacking merit for each task level that sees over a team.

- Including employees that work in critical decision making positions such as hiring, promotion and turnover, all employees are assigned to undergo compulsory "Withholding Unconscious Bias" and "Societal Gender Equality" trainings.

- Each employee is encouraged to be beneficial to the task at hand, state their ideas and to talk during debate-negotiation processes. Any language that might restrict employees with different ideas, which might directly inhibit dominance over other parties or limit their motivation to interact is not accepted in any way.

- Equal work division between different people in teams is fostered. No determined group of people can be tasked with unsustainable, new members get equal responsibility and work opportunities.

- To adapt the employees to the organization culture and values is the primary responsibility of the leaders.

- Our leaders come together with our employees regardless of their levels in different activities and receive feedback from employees.

7. WORKPLACE, WORK HEALTH AND SECURITY

- Workplace health and safety policies are drafted in accordance with diversity, equity and inclusion policies. All changes in work environments are carried out in consideration of all employees. The needs for different working groups such as pregnant people, individuals with disabilities and the elderly are determined; the health and security policies are prepared in accordance. The policy applications are periodically assessed and updated as necessary.

- The responsibility to create safe workplaces is not only valid for in-office employees or hybrid employees but also those that work remote. Different services from which the employees that work under different conditions are offered.

- By increasing the diversity, equity and inclusion of the flexible and remote working opportunity equality and chance of recruitment is created for those who have different expectations, limited abilities and more vulnerability as groups. For all employees as long as it fits in the regulation determined working types, as long as their job descriptions allow them they are offered different flexible working models such as working in timeframes determined by the individual, part time working, working for a determined time period, remote or hybrid working.

- In order to provide a healthy workplace to our employees in the instance of events like epidemic disease similar subjects. we engage our flexible working plan .



8.DIVERSITY, EQUITY AND INCLUSION IN CUSTOMER ACTIVITIES

We carry our customer operations under our customer centered work principles and Clean Banking Principles.

- No difference is held over religion, language, race, age, gender, political opinion similar subjects. between customers, the quality of work and precut does not change based on the personal traits of the customer.

- Offering solutions to customer within their financial needs and expectations, applicable products, services and solutions and in doing so providing fair, clear and market appropriate pricing is one of our top priorities.

- In different types of products and services available to the customers, the customers are informed clearly, extensively, accurately and in timely manner about things that require attention, the profit, possible risk, expense and gains included.

- With the products and services provided for parts that have limited access to financial resources we make them a part of the inclusion work model.





9. DIVERSITY, EQUITY AND INCLUSION FROM THE PROCUREMENT PROCEDURES

The Diversity, equity and Inclusion perspective applies not only to Akbank employees but also to the relationships we establish with our business partners. In this context, the following policies have been established:

- Within the framework of our procurement policies, our suppliers' commitments to generally accepted social and ethical standards or regulations such as "UN Global Compact", "Global Reporting Initiative", "SA8000", "Ethical Trade Initiative" are questioned.
- Small businesses and organizations belonging to groups affected by inequalities are supported. For this reason, women entrepreneurs, young entrepreneurs or entrepreneurs with disabilities are invited to the Akbank Supplier Pool via our Supplier Portal. Akbank's procurement policies and processes are in line with our diversity, equity and inclusion policies. Our procurement policies are periodically updated through necessary controls.
- In order to ensure supplier diversity and sustainability, certain tracking indicators are defined after the Supplier Portal is launched. Follow-up indicators are monitored and reported at regular intervals.

10. DIVERSITY, EQUITY AND INCLUSION IN SOCIAL INVESTMENT PROJECTS

- Within the framework of our social investments, sustainable projects serving the fields of Culture-Art, Training, Entrepreneurship and Volunteering are carried out.
- Our Social Investment Projects contribute to social and economic development in all segments of society with the support of Akbank and the volunteering activities of our employees.
- Volunteering activities support and add value to groups affected by inequalities in society.
- Non-Governmental Organizations (NGOs) and Akbank Volunteers are brought together to increase the impact of NGOs and volunteers.
- Social groups/platforms are created where employees can follow and participate in volunteering activities.
- Continuous development of volunteers is ensured through collaborations.
- Sustainable projects that create social benefit and reach large masses are created.

- Priority is given to projects that inspire and support development, free and original ideas in every field.
- Together with Akbank Volunteers and Akbank business partners, efforts are made to provide young people with the competences of the future. By organizing training activities and events, value is created for all young people across Turkey. Participant selection processes are in line with our Diversity, equity and Inclusion policies.
- We support the development of technology competencies by designing training programmers for female university students.
- By organizing events supporting young entrepreneurs across Turkey, we support participants' entrepreneurial competencies and benefit the entrepreneurship ecosystem.



11.MONITORING AND FOLLOW-UP APPROACH

11.1. MONITORING INDICATORS

Monitoring indicators are measured and reported at regular intervals in order to evaluate the impact of our Diversity, equity and Inclusion Policy and principles and to identify areas for improvement.

11.1.1. Monitoring Indicators for Supporting groups affected by inequalities and Gender Equality

- Percentage of employees with disabilities
- Ratio of the number of disabled candidates applying to job adverts and the number of disabled candidates called for an interview



- Ratio of the number of disabled candidates called for a job interview and the number of disabled candidates offered a job
- The ratio of the number of disabled candidates who received a job offer after the job interview and the number of disabled candidates who accepted the offer
- Turnover rate of employees with disabilities
- Employees with disabilities analysis in wage increase
- Participation rate of employees with disabilities invited to in-house structured training programmers
- Ratio of female to male employees in Akbank
- Ratio of female to male employees by business unit/division/directorate
- Ratio of female to male employees in senior management
- Ratio of female to male employees by job level
- Voluntary turnover rate among male and female employees
- Gender-based tracking of the reasons for voluntary leaving of recruitment
- Comparison of male and female employees in wage increase

- Performance grade analysis of employees returning from maternity leave with other employees
- Analyzing male and female employees in the use of leave
- Gender-based current situation analysis for vertical or horizontal transitions in the career map
- Gender-based monitoring of participation in structured training programmers
- Gender-based follow-up of survey results
- Ratio of female to male employees in Occupational Health and Safety Committees

11.1.2. Follow-up Indicators for Awareness Activities

- Proportion of employees receiving in-house training designed to raise awareness on Diversity, equity and Inclusion

11.1.3. Monitoring Indicators for Procurement Activities

- Number and percentage of businesses owned by women entrepreneurs among suppliers
-
- Number and percentage of businesses owned by young entrepreneurs among suppliers
-
- Number and percentage of businesses owned by disabled entrepreneurs among suppliers

11.1.4. Monitoring Indicators for Social Investment Activities

- Number of young university students and graduates involved in training activities within the scope of social investment activities

11.2. MEASUREMENT AND REPORTING METHODS

- The Executive Vice President and the 'Diversity, equity and Inclusion Working Group' are assigned in this area are responsible for measuring, reporting and communicating the relevant action proposals to the teams in order to improve the monitoring indicators.
- Globally launched and published indices are followed, related indicators are regularly monitored and measured indicators are revised accordingly if deemed necessary.
- Monitoring indicators are measured and reported by the 'Diversity, equity and Inclusion Working Group' on a monthly, quarterly and annual basis.
- The indicators measured at the end of each month are evaluated by the 'Diversity, equity and Inclusion Working Group' and an action plan is prepared.

- Each quarter, indicators are shared by the 'Diversity, equity and Inclusion Working Group' with the Executive Vice President responsible for Diversity, equity and Inclusion.
- Indicator results are included in the agenda of the Board of Directors.
- Each year, certain indicators are updated in the 'Environmental, Social, Governance Data Set' document on the Investor Relations page of our website.
- The determined monitoring indicators are reported on an annual basis in a publicly disclosed manner.
- Within the scope of ESG Governance, the Diversity, equity and Inclusion stakeholder team meets regularly to ensure that determined actions are actualized. The stakeholder team informs the Preliminary Committee on People and Society, to which it reports, about the process every 2 months, and the relevant progress is shared with the Sustainability Committee, which has Board-level involvement, twice a year.



AKBANK