

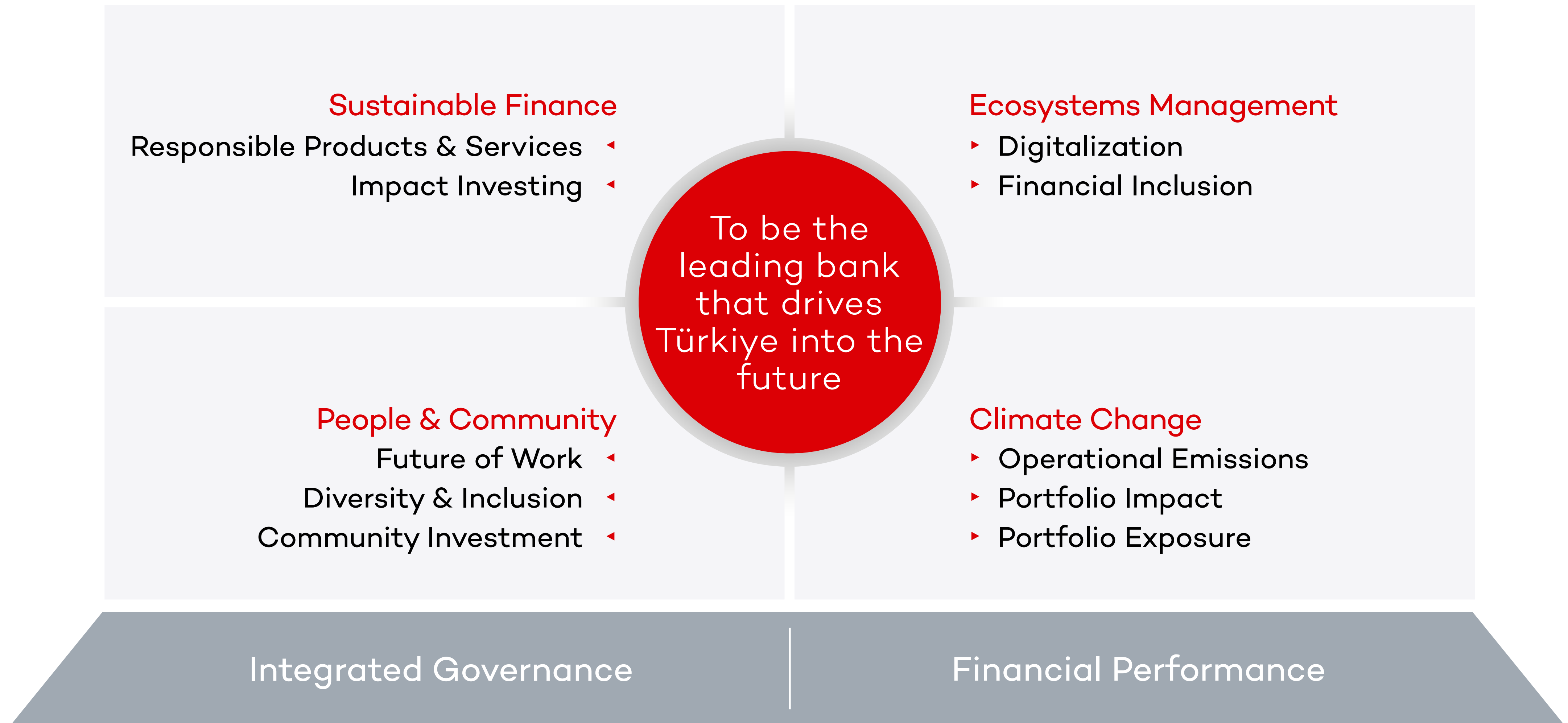
Our ESG Journey

April 2024

AKBANK

“Built upon your trust”

ESG Strategy: Mitigate environmental footprint while increasing positive impact



Actionable targets for positive impact

SUSTAINABLE FINANCE

Supporting a more sustainable economy

TL 800 bn
Sustainable
finance until
2030

TL 15 bn AuM
Sustainable
investment funds
2030



Increase **sustainable borrowing**
secured by the bank until **2030**

ECOSYSTEMS MANAGEMENT

Enhancing financial
health & inclusion

Extend digital,
innovative
**products &
services**

Achieve **10%
annual growth** in
of women SMEs by
2025



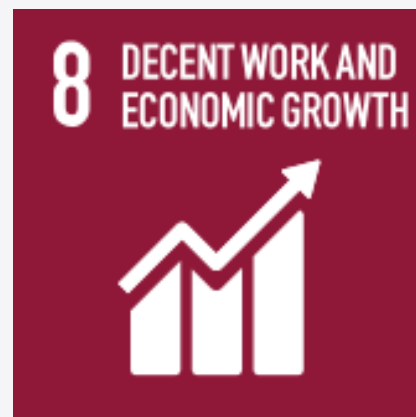
Increase number of **financially
empowered people** until **2030**

PEOPLE & COMMUNITY

Empowering our people
and communities

Improve the
effectiveness of
investment on
our people

Increase **Social
Return on
Investments**
for community
investments



Enhance the effectiveness of **Akbank
volunteerism** in community investments

CLIMATE CHANGE

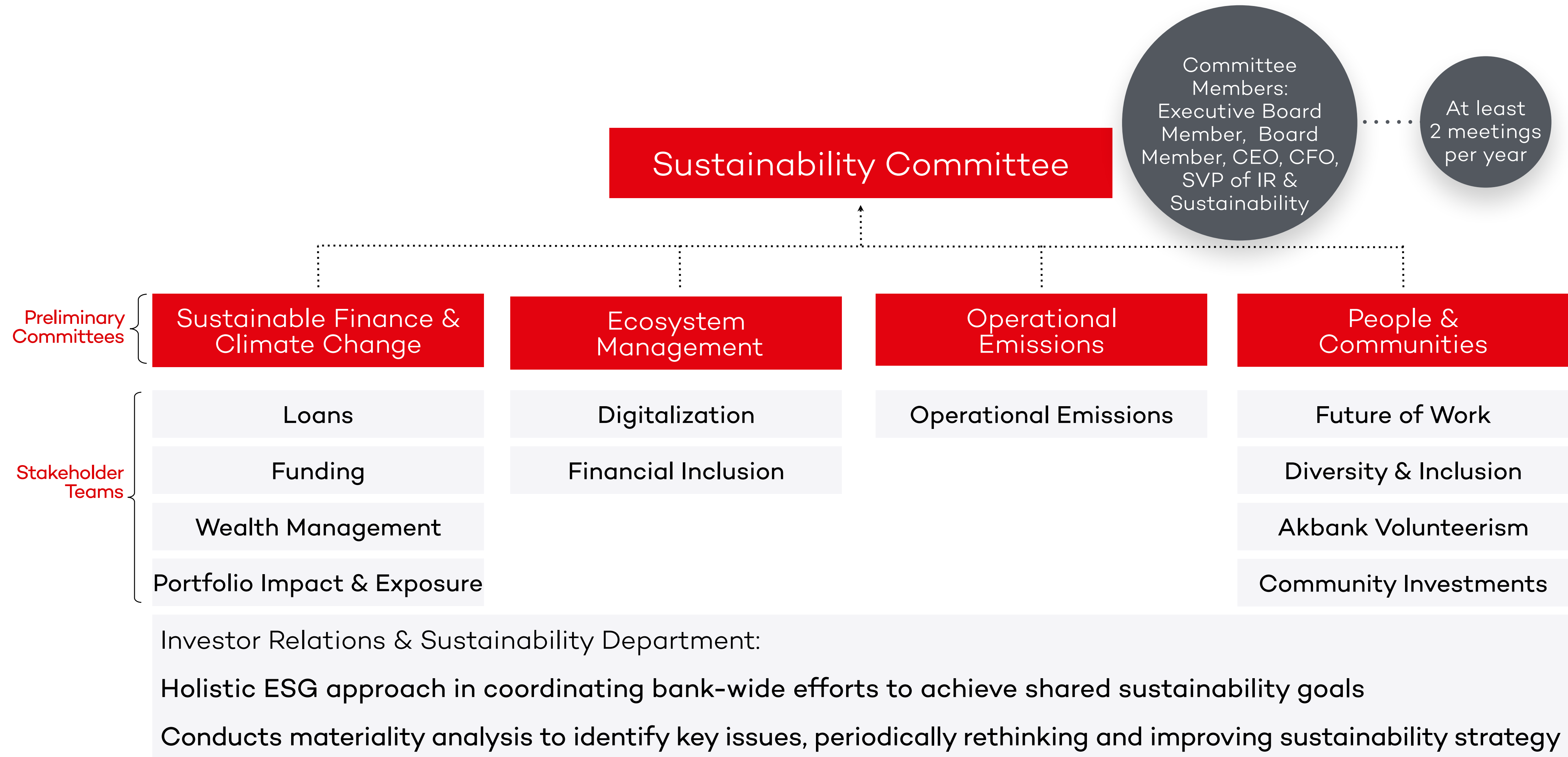
Reducing our impact on
environment

Become a **net-zero bank** through reducing
operational and portfolio emissions by
2050



Mitigate **climate-related risks &
impact** on portfolio

Robust governance structure to generate long-term value



ESG performance at a glance

SUSTAINABLE FINANCE

Supporting a more sustainable economy

TL 226 bn
sustainable finance provided since 2020YE ⁽¹⁾

59%
ESG-linked borrowing

165%
increase of investors in ESG-themed funds ⁽²⁾

Environmental and Social Risk Framework
for all commercial and SME loans

Sustainable Finance Framework
in line with international standards

PEOPLE & COMMUNITY

Empowering our people and communities

~57%
women in CEO's direct reports

32 hrs
training/employee

Akbank+
intrapreneurship program

135K
students reached by Akbank Youth Academy since 2020

Women's Empowerment Principles, 30% Club, Valuable 500, Bloomberg Gender Equality Index
member

ECOSYSTEMS MANAGEMENT

Enhancing financial health & inclusion

USD 240 mn
resource via international funding organizations for Women SMEs

Corporate Digitization
partnerships with prominent e-commerce companies

17K
SMEs reached by Akbank Transformation Academy since 2022

700+
startups & ecosystem players connected with Akbank LAB in 2023

CLIMATE CHANGE

Reducing our impact on environment

2030 sectoral targets
prioritized carbon intensive sectors

90%
reduction of absolute Scope 1 & 2 GHG emissions by 2030 from 2019 base year

100%
electricity sourced from renewables

82%
reduction in operational emissions in 2023 since base year 2019

562
locations obtained energy & environment management certification

(1) Based on bank-only MIS data, includes: Granted SME loans (e.g. access to essential services, women-owned SMEs) & renewable loans, other green and social loans in line with Sustainable Framework, and ESG-type Eurobond & syndicated loan purchases
(2) Increase in # of investors compared to 2022

01 Sustainable Finance

02 Ecosystems Management

03 People & Community

04 Climate Change

05 Integrated Governance

2023: Sustainable finance for green & inclusive transformation

Successfully exceeded our TL 200 bn target by the end of 2023 ⁽¹⁾

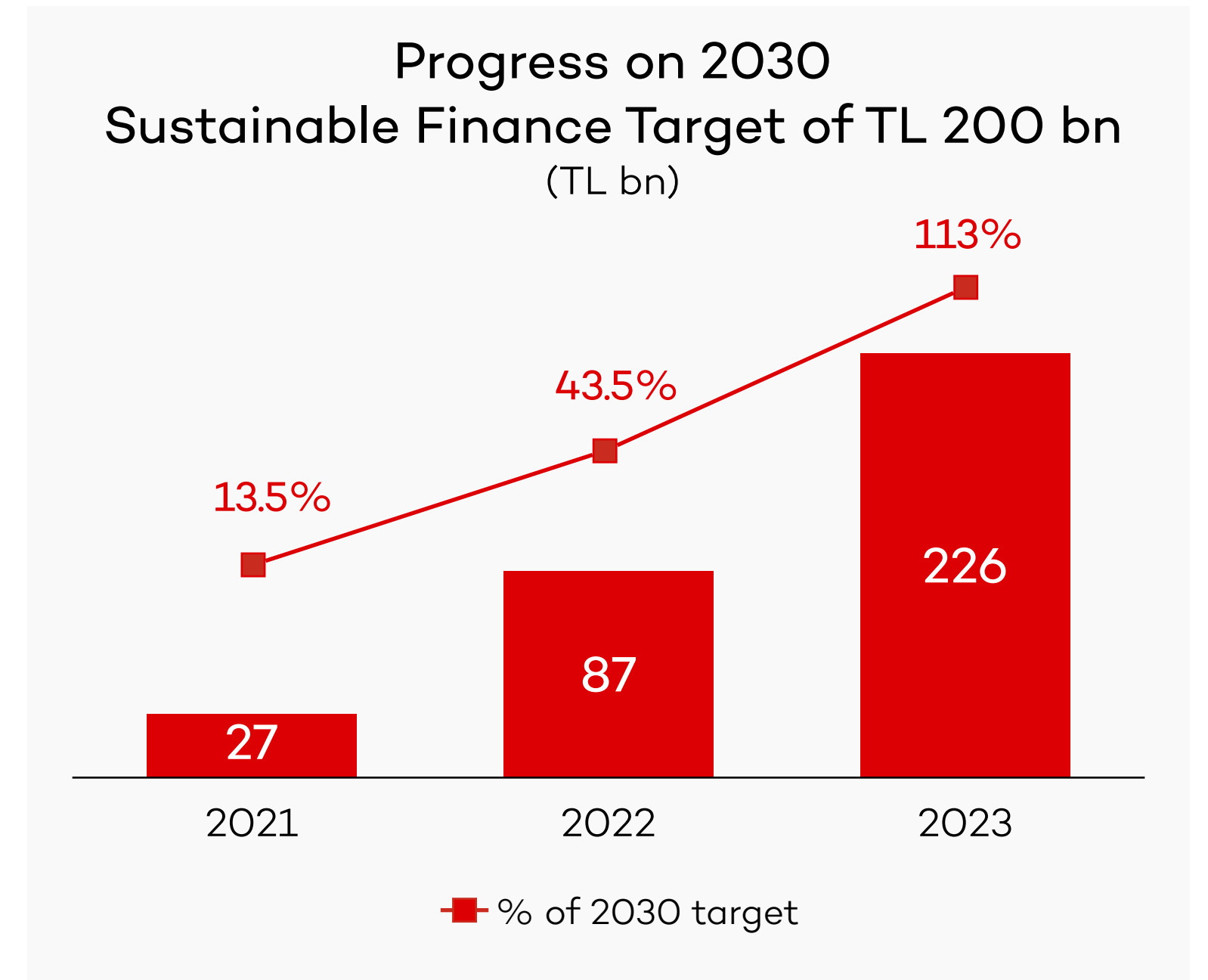
- ▶ 2030 Sustainable Finance target has been increased from TL 200 bn to TL 800 bn
- ▶ Customized sustainable finance products (e.g. Türkiye's first Sustainable Deposit Product, Digital and Financial Solutions with a Focus on Sustainable Agricultural Supply Chain)
- ▶ Total ESG-themed funds AuM reached TL 3.2 bn, with 174K investors (%165 increase in # of investors compared to 2022) ⁽²⁾
- ▶ Published further enhanced Sustainable Finance Framework with SPO in April
- ▶ Completed ESG, sustainable finance and climate change trainings for all corporate & commercial branch employees

ESG share in total wholesale funding transactions reached 59%

- ▶ USD 300 mn Sustainability and Gender themed Tier-2 in July 2023, issued to AIIB, DFC and IFC (first gender Tier 2 globally)
- ▶ Türkiye's first syndicated social loan in April 2023, providing USD 500 mn for trade finance transactions in the earthquake area
- ▶ Issuance of 8 social bonds totaling up to USD 243 mn with 1 year maturity

Recognized for leadership by Global Finance

- ▶ Received 4 awards, including "Leader in Sustainable Finance" in Türkiye



For more on
sustainable finance



AKBANK

(1) Based on bank-only MIS data, includes: Granted SME loans (e.g. access to essential services, women-owned SMEs) & renewable loans, other green and social loans in line with Sustainable Framework, and ESG-type Eurobond & syndicated loan purchases

(2) ESG-themed funds by Ak Asset Management are Innovative Companies in Health Sector Fund, Alternative Energy Fund, Electric and Autonomous Vehicle Technologies Fund, Venture Capital Investment Fund and ESG-themed fund by Agesa: Sustainability Equity Pension Fund

Pioneering ESG-linked transactions

Green Bond 3Q20

- ▶ USD 50 million, 4 year 100 days maturity, in line with ICMA's Green Bond principles
- ▶ First Green Bond issued by a Turkish bank during the pandemic

Sustainable Tier 2 2Q21, 3Q23

- ▶ USD 500 mn, 10 yrs maturity with a call option at the end of 5 yrs
- ▶ 1st Turkish bank to issue sustainable subordinated debt
- ▶ Sustainable & Gender themed Tier 2, USD 300 mn (self-arranged issuance to AIIB, IFC & DFC) (first gender t2 globally)

Syndicated Loans 2Q21, 4Q21, 2Q22, 4Q22, 2Q23

- ▶ ~ USD 675 mn (2Q21); ~ USD 700 mn (4Q21); ~ USD 700 mn (2Q22); ~ USD 400 mn (4Q22); Criteria linked to increasing renewable energy sourcing in own operations & a new KPI of replacing credit cards with recycled PVC credit cards
- ▶ ~ USD 500 mn (2Q23); 1st social syndicated loan in Turkey structured with use of proceeds under Sustainable Finance Framework: Facilitate trade finance in 11 cities impacted by the earthquakes in February in Turkey

EBRD 4Q21, 2Q22, 3Q22, 2Q23

- ▶ Secured USD 100 mn from EBRD's Women in Business Program
- ▶ Secured USD 65 mn under EBRD's DRF in support of regions impacted by earthquakes

IFC 4Q23

- ▶ Secured USD 60 mn and EUR 10 mn in support of regions impacted by earthquakes

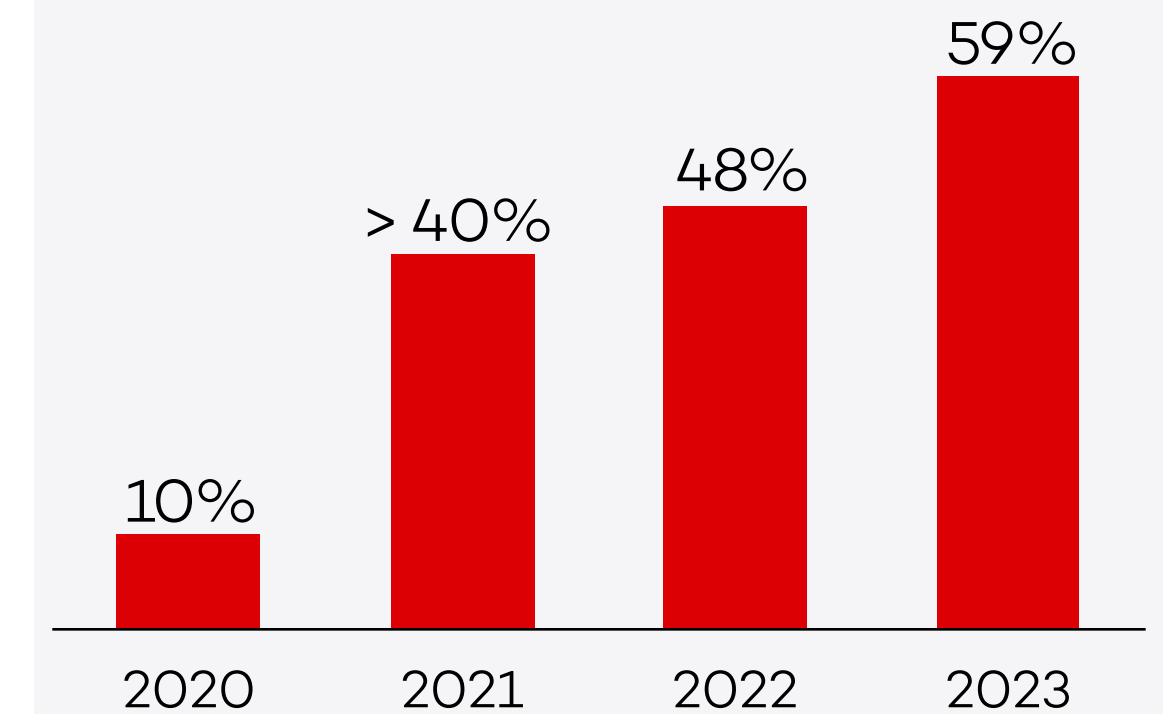
Proparco 1Q23

- ▶ Secured USD 50 mn in total from Proparco in support of women and green SMEs

Green and Social Bonds 4Q22, 2023

- ▶ USD 20 mn Social Notes and USD 20 mn Green Notes (4Q22)
- ▶ 1st Turkish bank listed on Vienna Stock Exchange
- ▶ 1st issuance under Green and Sustainable Debt Guidelines of CMB Turkey
- ▶ 8 Social Bonds totaling USD 243 mn (2023)

Sustainable Funding⁽¹⁾ Share in Total Wholesale Transactions



1st Turkish bank to announce
100% ESG wholesale funding
commitment by 2030

Turkey's most comprehensive Sustainable Finance Framework

Use of proceeds

- ▶ Technical criteria aligned with different stakeholders' ⁽¹⁾ expectations, including 10 green & 6 social eligibility criteria with newly added categories such as:
 - Green: Climate adaptation, terrestrial and aquatic biodiversity, sustainable tourism, green hydrogen, biomass & biofuels, hybrid/EV marine transportation and R&D investments
 - Social: Disaster relief, access to basic infrastructure, food security
- ▶ References to EU Taxonomy; in line with relevant guidelines and frameworks

Project evaluation & selection

- ▶ Newly established Sustainable Finance Allocation Committee to ensure allocation in line with eligibility criteria (both for loans and funds/bonds)
- ▶ Akbank's Environmental and Social Credit Policies applied in all commercial lending practices

Management of proceeds

- ▶ Project based reviews for compliance with eligibility criteria
- ▶ Use of proceeds monitoring throughout the loan's maturity

Reporting & external verification

- ▶ Second Party Opinion by ISS Corporate Solutions
- ▶ Annual allocation reports publicly announced
- ▶ Limited assurance from independent auditors

Our SFF & SPO



Diverse product base for impact investing

01

ESG-themed funds by Ak Asset Management

- ▶ TL 3.2 bn AuM, 174K customers (2023)
(%165 increase in # of investors compared to 2022)
- ▶ Funds secured rating by Refinitiv and MSCI, 1st in Turkey
 - Health Sector Foreign Equity Fund
 - Alternative Energy Foreign Securities Fund
 - Electric and Autonomous Technologies Variable Fund
 - First Renewable Energy Private Venture Capital Investment Fund
 - JEC Renewable Energy Private Venture Capital Investment Fund
 - Agricultural and Food Technologies Variable Fund
 - Agesa Sustainability Equity Pension Fund

02

Social and Environmental Bonds

- ▶ TL 770 mn Domestic Social Bonds issued since 2021
- ▶ 1st Domestic Social Bond in Turkey (September, 2021)
 - TL 340 mn
 - Financing two projects, supporting SDG#3, “Good Health & Well-being”
 - In line with Sustainable Finance Framework

03

ESG-themed IPOs by Ak Investment

- ▶ TL 999 mn public offering of energy company (April, 2023)
 - Over 230K investor demand
- ▶ TL 517 mn public offering of biotech company (October, 2021)
 - Over 100K investor demand

On track for “TL 15 billion sustainable investment funds by 2030” target

AKBANK

Customized Sustainable Finance solutions

		E	S
Corporate & Commercial	Rooftop Solar Panel Investment Loan	✓	
	▶ Collaboration with leading EPC companies to meet end-to-end needs		
	Blue Loan Package (1 st in Türkiye)	✓	
	▶ Protect the seas & biodiversity, combat water pollution, develop sustainable tourism		
	Low Carbon Transition Loan (1 st in Türkiye)	✓	
	▶ Support customers to reduce carbon emissions		
	Renewable Energy Loan	✓	
	▶ Support low-carbon energy transition		
SME	EcoLease by Ak Lease (1 st in Türkiye)	✓	
	▶ Support renewable energy, energy & resource productivity		
	Sustainable Deposit (1 st in Türkiye)	✓	✓
	▶ A sustainable cash management solution support for both environmental and social projects		
	Digital and Financial Solutions with a Focus on Sustainable Agricultural Supply Chain	✓	✓
	Environmentally Friendly Vehicles Loans	✓	
	Women-owned SME Package		✓
	▶ Partnership with EBRD & Frankfurt School, special focus on exporters & manufacturers, training & mentorship support		
Retail	Eco-Transformation Package (1 st in Türkiye)	✓	✓
	▶ 7 different products to meet different needs of SMEs		
	▶ First in industry: Special Financing Support backed by Export Development Cooperation – İGE		
	Agricultural Loans (i.e. drip irrigation, etc.)	✓	✓
Retail	Environmentally Friendly Vehicles Loans	✓	

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2023: Innovative products & services to enhance businesses and financial health

Set target for financial health and inclusion

- ▶ Achieving a growth rate of 10% per year in the number of women-led business customers to increase financial resilience and support sustainable business growth by 2025 under the scope of UN PRB financial health and inclusion commitment ⁽¹⁾

Empowered SMEs with financial and non-financial support

- ▶ USD 50 mn secured from Proparco for Eco Transformation Package
- ▶ First in industry: Special Financing Support backed by Export Development Cooperation – İGE
- ▶ New partnerships with leading technology and e-commerce companies, such as SolarVis (a B2B company supporting digitalization of solar energy providers)
- ▶ Launched Akbank BinYaprak Women Entrepreneur Mentorship Program

Fostered sustainable entrepreneurship ecosystem

- ▶ Introduced Entrepreneurship Banking Solutions (Including offering investment opportunities to entrepreneurs with Ak Asset Management Venture Capital Fund)
- ▶ Commenced the second term of Türkiye's 1st full time spin-off program Akbank+
- ▶ Interacted with +1000 start-ups and interviewed +700 start-ups
- ▶ Boost the Future, an accelerator program supporting entrepreneurs started in partnership with Endeavor Turkey (5th year)

For more on how we empower SMEs ⁽²⁾



(1) [United Nations PRB Commitment to Financial Health and Inclusion – Summary Report](#) 
(2) ESG Presentation (pg.14)

Financial inclusion: Supporting SMEs in their digitalization and e-commerce journey

hepsiburada

n11.com

trendyol

TEKNO SA

Yemeksepeti

Propars

PARAŞÜT

usersdot

Mükellef

Türkiye's top e-commerce platforms: c. 40K merchants, majority SMEs; 24K benefited from the following advantages while collecting progress payments through Akbank;

- ▶ Chip money on progress payment for Trendyol, Hepsiburada, N11 and Yemeksepeti
- ▶ Free money transaction for merchants
- ▶ Zero interest overdraft account
- ▶ Advantageous POS commission rate offers
- ▶ Budget for salary payments
- ▶ Chip-money campaign for commercial credit cards

Services offered free of charge or at a discount to SMEs

- ▶ Propars: Platform provides access to e-commerce marketplaces through a single application offered to Akbank SMEs at special prices or free of charge as part of the package
- ▶ Paraşüt: Pre-accounting program, free of charge for 1 year within the scope of packages for SMEs
- ▶ Usersdot: One platform for all applicable data needs, free of charge within the scope of e-commerce development packages

The most comprehensive platform in Turkey to start new businesses

- ▶ Mükellef: Special discounted prices for Akbank SMEs that establish their companies with Mükellef

AKBANK

Financial inclusion: SME & Youth & Disability



- ▶ Program for university students under 26
- ▶ Needs & preferences of youth through targeted products and services
- ▶ Free membership via Akbank Mobile & akbank.com; digital onboarding
- ▶ No fees for daily banking transactions, withdrawal from ATMs Türkiye & abroad
- ▶ Overdraft accounts w/ 0% interest rate for weekends
- ▶ Communication on student platforms
- ▶ Special discounts on some brands which are frequently used by students & cashback offers for debit/credit card transactions



- ▶ Tosla, mobile platform targeting individual users, providing inclusive financial services
 - ◉ Digital, invoice payments and contactless prepaid card
 - ◉ Free and easy top-up & withdrawal
 - ◉ 24/7, free P2P transfers, open banking features, split
 - ◉ Campaign and cashback
- ▶ Tosla İşim, payment facilitator targeting commercial users and SMEs.
 - ◉ Virtual POS
 - ◉ Pay by Link
 - ◉ Cash Register POS
 - ◉ Credit Gateway



- ▶ 1st company in Türkiye to join Valuable 500
- ▶ Enhancing disability inclusion via customized solutions:
 - ◉ “The Right Approach to Disability” trainings for employees
 - ◉ Video calls with sign language
 - ◉ Audio support for digital and mobile services, endorsed by Blindlook
 - ◉ Branches & ATMs designed to facilitate access to our services

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2023: Empowering our people and communities

Further strengthened D&I culture

- ▶ New Chief Diversity Officer announced (SME Banking EVP)
- ▶ Akbank's "Red Book" launched to support collaborative and diverse cultural transformation
- ▶ Mentoring program under Role Model Akbank

Akbank Academy reached 61K young people (135K since 2020)

- ▶ Support our youth with leading education and financial literacy programs

Bright Tomorrows Movement

- ▶ A long term collaboration with Community Volunteers Foundation in earthquake-affected cities
- ▶ Supporting young people to heal and prepare for the future through art, technology and science

Active support for humanitarian efforts in disaster-struck areas

- ▶ Supported priority needs such as shelter, heating and nutrition
- ▶ Provided relocation and accommodation for employees in the area
- ▶ Facilitated uninterrupted operations thanks to our superior digital and technological capabilities
- ▶ Prioritized youth from the disaster struck area in our hiring processes

For more, please see
our D&I policy



For more on
D&I



People & Culture: Shaping the future of work

Policies to solidify culture

- ◉ Zero Tolerance to Violence Policy
- ◉ Diversity & Inclusion Policy
- ◉ Remuneration Policy
- ◉ Human Rights Policy

Commitment to global standards

- ◉ Bloomberg Gender Equality Index (member since 2020)
- ◉ UN Women Unstereotype Alliance member

56%

Women in revenue generation roles

44%

Women in STEM roles



Akbank Academy

- ◉ Next-generation technology & infrastructure
- ◉ 24/7 access to online training
- ◉ Key skills for future of work: social, cognitive & technological
- ◉ Digital trainings during remote work
- ◉ Competency-based & personalized development

32 hrs

training/employee (29% online)

1,794

Webinars (32,577 views)

Creating shared value by investing in our communities

Arts & Culture

- ▶ Akbank Art Center (+700 events/yr)
- ▶ Akbank Jazz Festival (+5K artists, 650K viewers in 33 yrs)
- ▶ Akbank Short Film Festival (40,000 viewers in 2023, 19th year in 2023)
- ▶ Akbank Children's Theater (2.5 mn children in 51 yrs)
- ▶ Contemporary Art Education Program (40K in 13 yrs)
- ▶ Contemporary Istanbul (reached 54,500 people in 2023)
- ▶ Sakıp Sabancı Museum: Ai Weiwei, Rodin, Dali, Anish Kapoor, Marina Abramovic, David Hockney

Entrepreneurship

- ▶ Second term of Türkiye's 1st full time spin-off program Akbank+
- ▶ Interaction with +1000 start-ups and interview with +700
- ▶ 5th year of Boost the Future, an accelerator program supporting entrepreneurs, in partnership with Endeavor Türkiye (12 start-ups in 2023)
- ▶ Akbank Hackathon: DisasterTech (+600 applicants, 33 teams, 10 finalists)
- ▶ Inospark Innovation Camp in collaboration with Akbank LAB, TÜBİTAK Marmara Teknokent, Sabancı Üniversitesi İnovent and Kavlak

Education

- ▶ Center of Excellence in Finance, started online education in 2020
- ▶ Akbank Youth Academy (135K students in 3 yrs)
- ▶ CEF & Akbank Youth Academy Finance Education Certificate Program for University Students
- ▶ Computer donations (+4K computers since 2015)

Volunteering

Part of our culture

Akbank Volunteers from
all over the country

Digital platform introduced in
2022

«Good State of the City»

+20K youth

+25 NGOs

9 yrs

AKBANK

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2023: Advance efforts to mitigate environmental footprint & manage climate risk

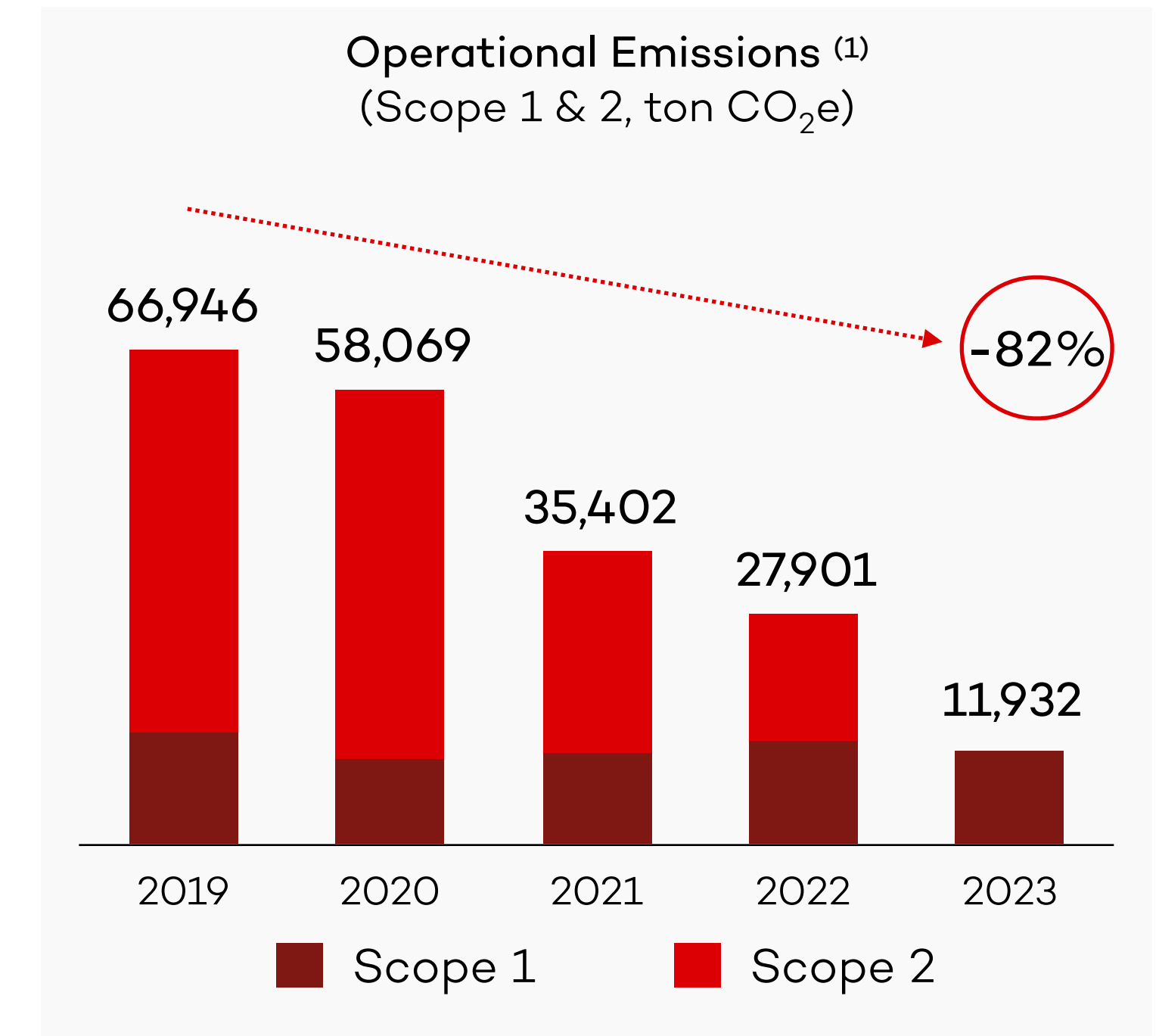
Steps towards becoming a Net Zero Bank by 2050

Decarbonization of our operational emissions

- ▶ %82 reduction in our operational emissions in 2023 since base year 2019
- ▶ Set interim emission reduction target in line with 1.5°C scenario: Reduce absolute Scope 1 and Scope 2 GHG emissions %90 by 2030 from 2019 base year
- ▶ 100% of bank's electricity sourced from renewable resources since the beginning of 2023
- ▶ Extended capacity building in energy efficiency and waste management
 - ISO 50001 (Energy Management) & 14001 (Environmental Management) trainings completed in 251 branches in 2023 (562 branches in total)

Decarbonization of our portfolio emissions

- ▶ Calculated Scope 3 Category 15 emissions in line with PCAF methodology for various asset classes covering corporate, commercial and SME loan portfolio
- ▶ Set interim emission reduction targets for prioritized carbon intensive sectors
- ▶ Offered digital tools to our customers to calculate their own carbon footprint
- ▶ Organized workshops to increase our customers' awareness on Carbon Border Adjustment Mechanism
- ▶ Spatial climate risk analysis for PF portfolio: Addressing location and sector-specific climate risks for all PF loans



For more, please see
our integrated report



AKBANK

Loan Portfolio Emissions – Step by step to our 2050 net zero target

Embedding climate change into our lending processes

- ▶ Since 2021, we finance low carbon investments aligned with the criteria stated under our Sustainable Finance Framework
- ▶ Since 2023, embedding climate change due diligence process within our lending processes for hard to abate sectors

Shaping our Net Zero journey in line with global climate initiatives

- ▶ Loan portfolio emissions have calculated, including overall commercial loan book, in accordance with PCAF methodology
- ▶ 2030 emission reduction targets were set for most significant carbon intensive sectors in our portfolio

Reaching our Net Zero target with our business partners

- ▶ Climate mitigation efforts of our business partners are closely monitored with close client engagement
- ▶ We aim to support the green transformation of our carbon-intensive sectors (cement, iron-steel, aluminium, fertilizer, electricity) that may be affected by the Carbon Border Adjustment Mechanism
 - ◉ We provide Transition to a Low Carbon Economy Loan to our business partners aiming to reduce their carbon emissions
 - ◉ A free of charge digital tool service for calculating client-level carbon footprint & ESG scoring
 - ◉ Low carbon, Sustainable agriculture-oriented supply chain finance solutions
 - ◉ Green and low carbon entities to be prioritized in our lending processes going forward

Environmental & Social Risk Management for entire commercial portfolio

NON-FINANCING ACTIVITIES LIST

- ▶ Activities not to be financed regardless of limit, without requiring E&S assessment
- ▶ Examples of new inclusions:
 - New and capacity increase of existing coal thermal power plants, new coal mining projects
 - Coal transportation and power plants operating with coal for SMEs
 - Production & trade of weapons of mass destruction, land mines & weapons
 - Production and trade of palm oil without RSPO certificate

POLICIES, PROCEDURES & SYSTEMS

- ▶ Designed for efficient risk management
 - Risk categorization
 - Prioritized sectors & issues covered by detailed approaches & policies
- ▶ Environmental & Social Management System (ESMS)
 - Designed for entire commercial portfolio
 - Dedicated ESMS Team & Regional ESMS Manager
 - E&S risk score, assessment and monitoring for customers
- ▶ Environmental and Social Impact Assessment (ESIA)
 - For Category A (high-risk) activities
 - New investment loan requests with investment amount over USD 10 mio
 - Project finance requests in high E&S risk sectors
 - Due diligence in line with IFC performance standards

SUPPORT MECHANISMS

- ▶ Regulations & International Standards
 - World Bank Sector Guidelines, IFC Performance Standards, EBRD Performance Requirements, Equator Principles







REPORTING & MONITORING

- ▶ Annual reporting
 - Integrated Report, 3rd party assurance for projects evaluated
- ▶ ESG-themed grievance mechanism
- ▶ Projects undergone E&S assessment regularly monitored

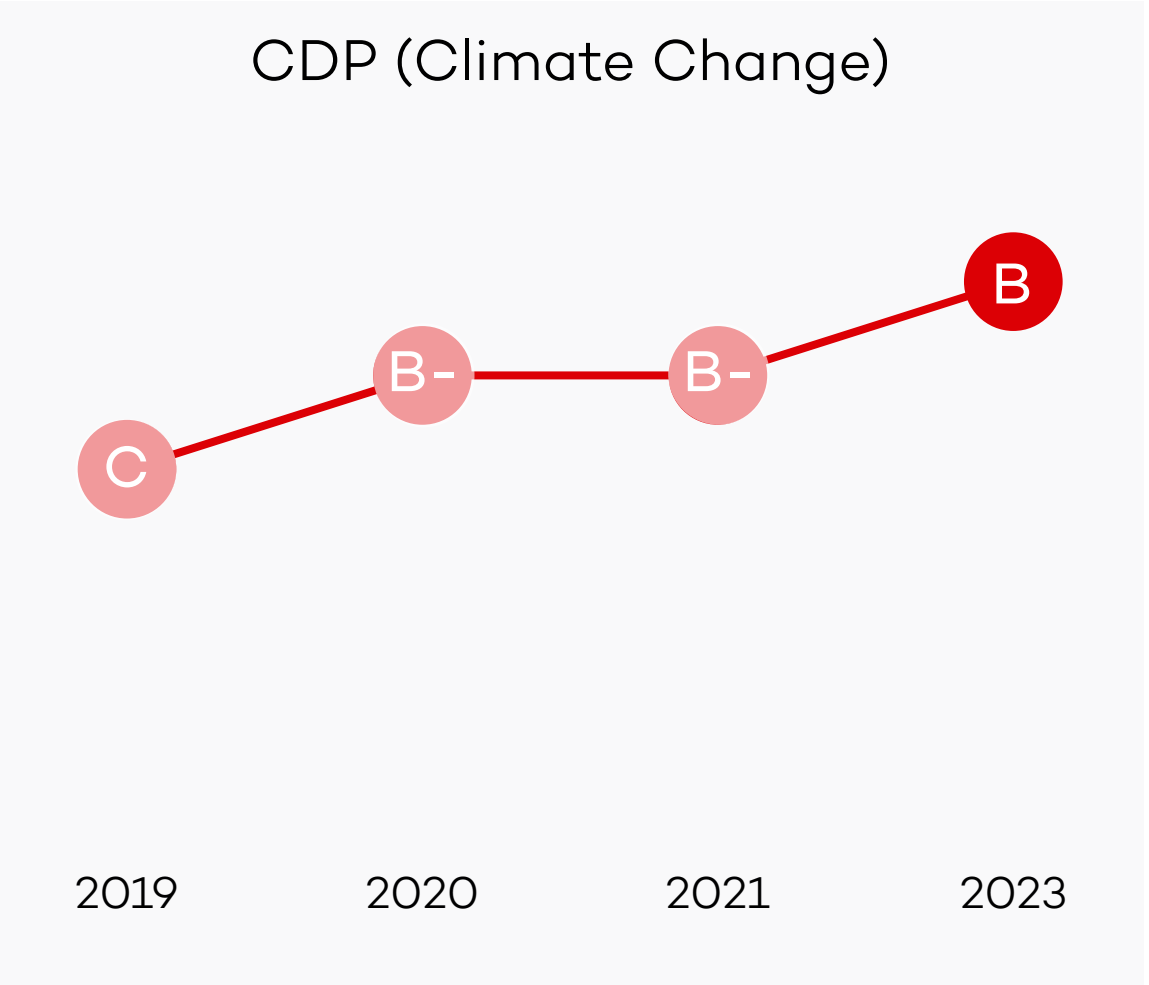
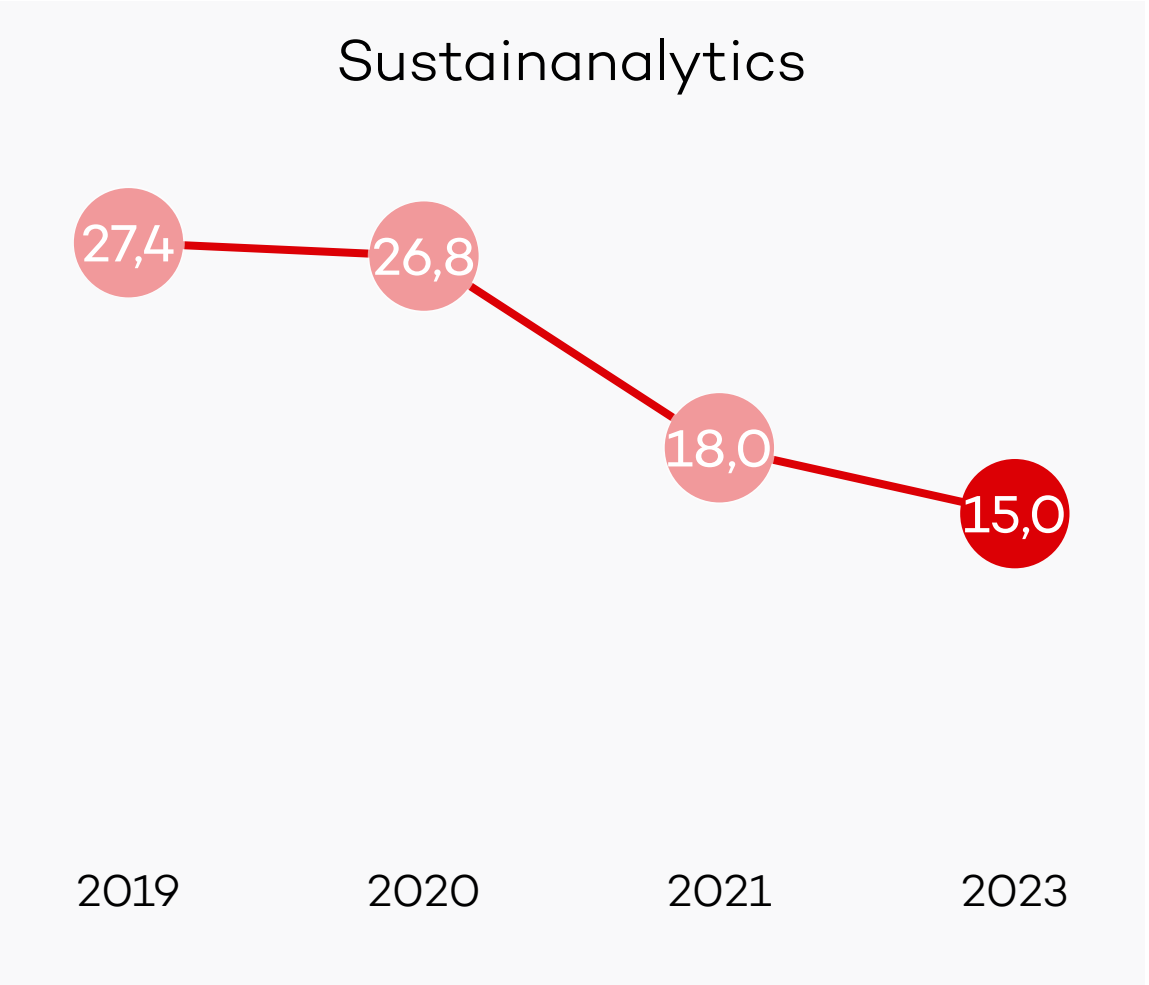
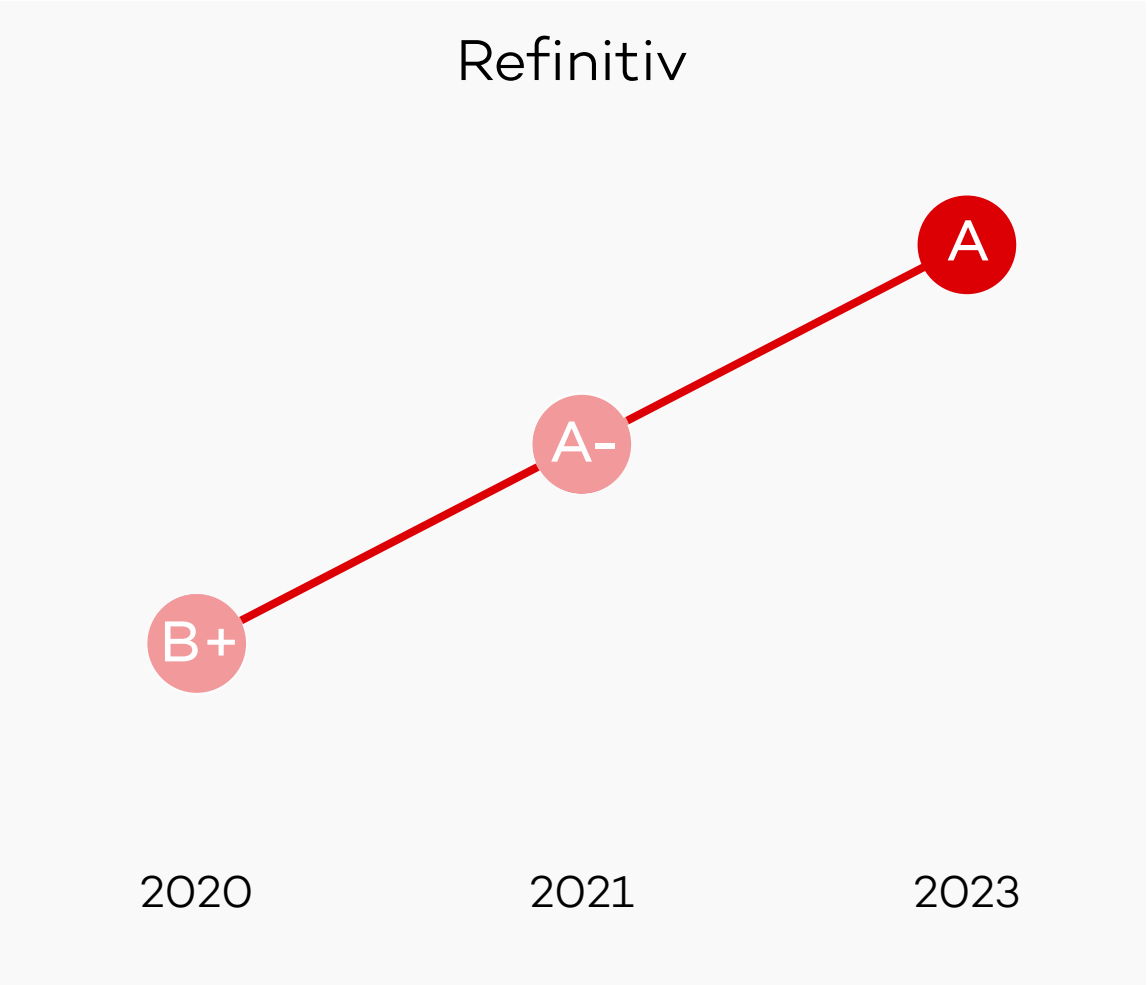
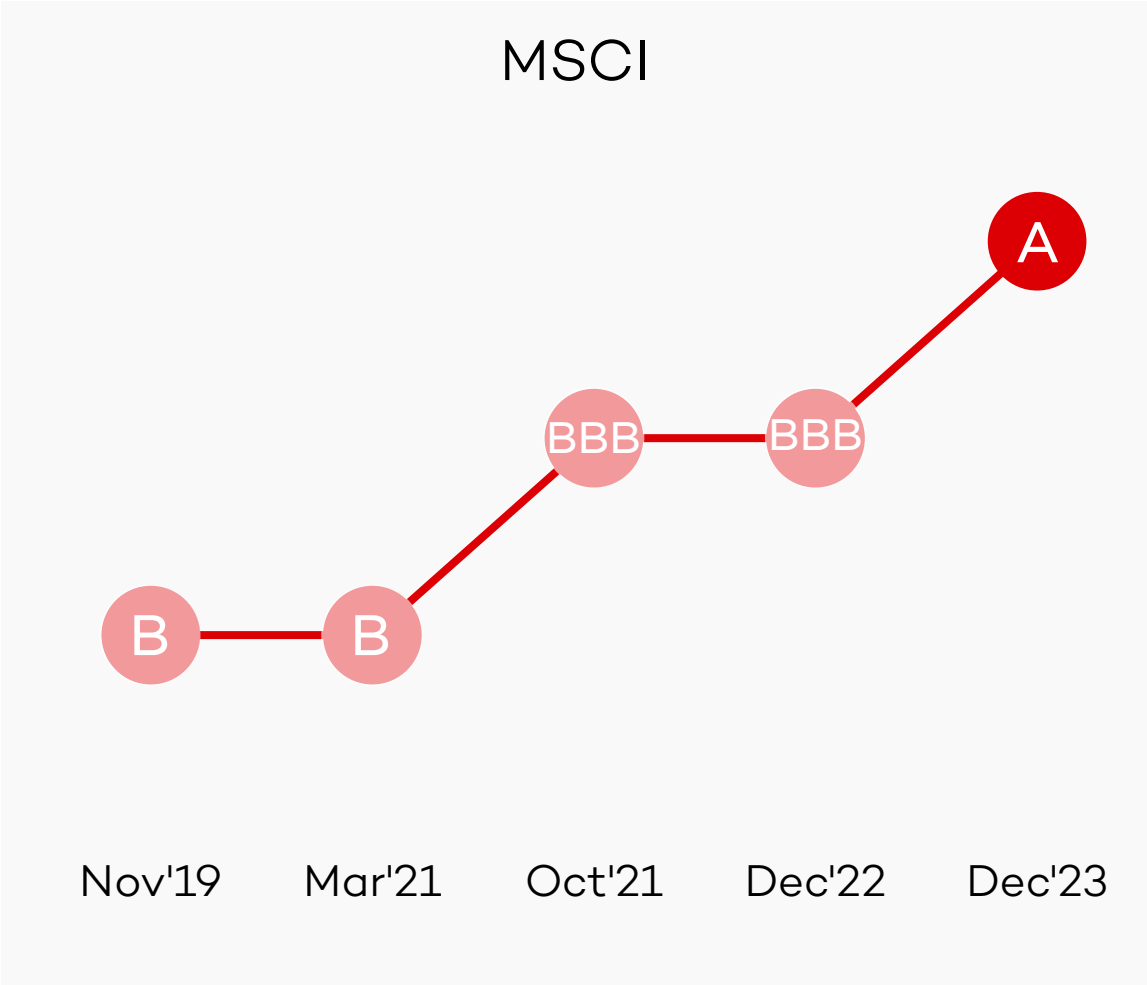
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Transparent & holistic approach validated in our ratings

Indices						
Range	AAA/CCC	A+/D-	0-100	0-40+	A/D-	1-5
Score	A	A	78.01	15.0 (Low Risk)	B	3

Progress



2024: Continue our ESG roadmap aligned with 2030 SDGs

Sustainable Finance

- ▶ Support decarbonization by engaging with customers and product innovation
- ▶ Continue to focus on ESG-linked funding
- ▶ Diversify ESG-themed investment products

Ecosystem Management

- ▶ Support green transformation of SMEs and empower women-owned SMEs
- ▶ Offer financial and non-financial services to SMEs and individuals
- ▶ Further strengthen entrepreneurship, youth and accessible banking

People & Community

- ▶ Continue efforts for a more diverse & inclusive workplace with a focus on women, youth, vulnerable groups
- ▶ Continue to create social impact with community investment initiatives
- ▶ Support our youth with leading volunteering and education programs

Climate Change

- ▶ Execute decarbonization roadmap for portfolio and operations, with interim targets to reach net zero by 2050
- ▶ Continue 100% electricity sourcing from renewable resources
- ▶ Expand ISO 50001 & 14001 certificates to include all branches

Collaborations with national and international initiatives



Governance structure for long-term, sustainable decision-making

- ▶ Split roles for Chairman & CEO
- ▶ Board structure in compliance with CMB⁽¹⁾ legislation
- ▶ Remuneration policy
 - ◉ Remuneration of Board Members and Senior Management in line with the regulations of the BRSA⁽¹⁾ and CMB
 - ◉ Total compensation quarterly disclosed in annual report
- ▶ Donation policy
 - ◉ Maximum limit approved annually at General Assembly
 - ◉ Total donations disclosed in annual report

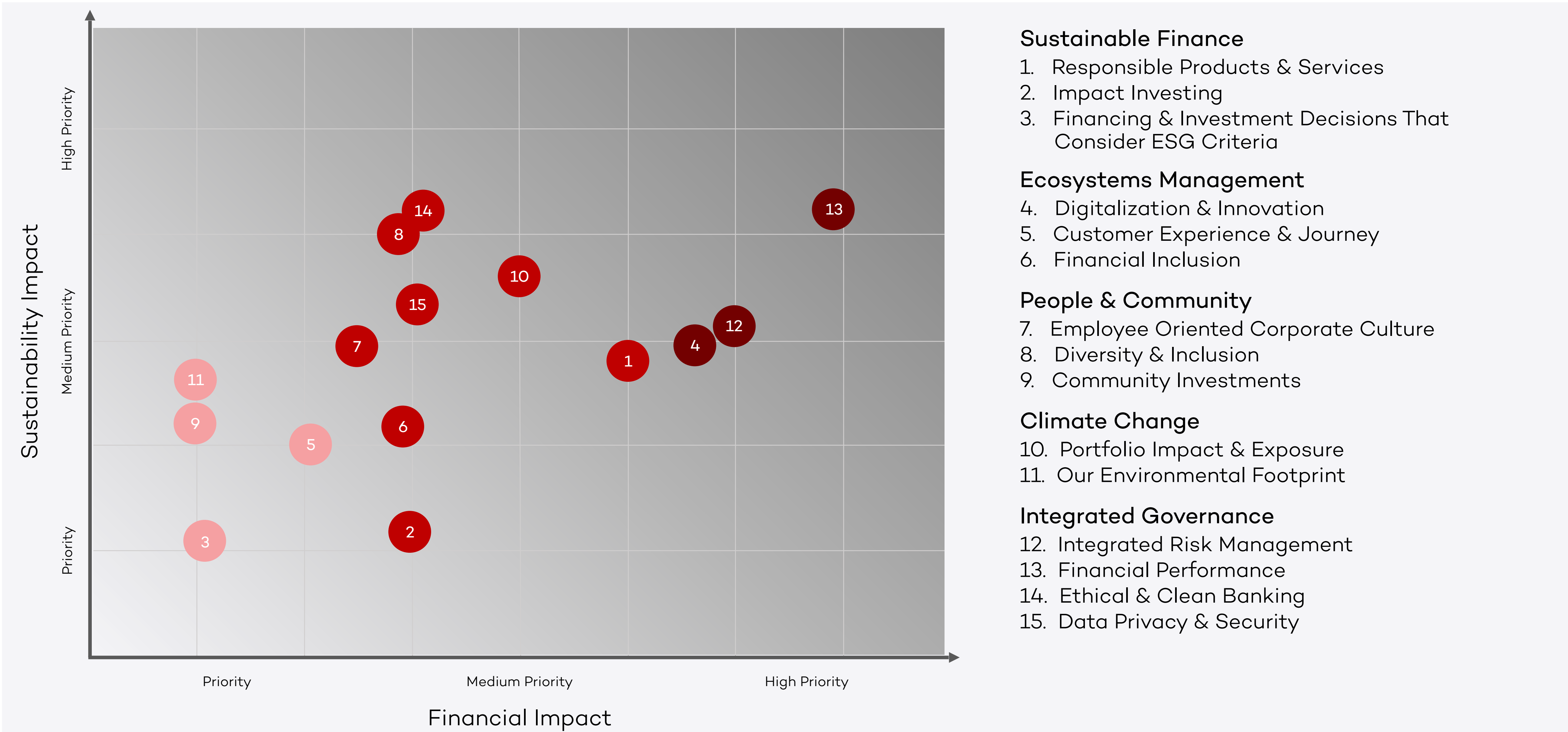
Prudent Risk Management

- ▶ Chief Risk Officer reports directly to the BoD
- ▶ 1st bank in Turkey to integrate Machine Learning scorecards into credit processes
 - ◉ Cutting edge methods and tools
- ▶ Chief Information Risk Officer reports directly to the BoD, aspirational global best practice⁽²⁾
 - ◉ 1st financial institution in Turkey
 - ◉ Recognized as best practice, mandatory as of 2021 according to the new banking regulation
 - ◉ Top priorities: Cybersecurity, data security/privacy and fraud risk management

Robust application of policies through training & monitoring

Policies	Approach	Training
Ethical Principles	Drawn to enlighten us in all kinds of transactions, behaviors and decisions	<ul style="list-style-type: none"> ▶ For all employees: Code of Ethics, Information Security, Data Leakage, Law on Protection of Personal Data, Anti-corruption, Sustainability ▶ Specialized trainings: International Sanctions/Combating Proceeds of Crime training, Sustainable Banking and Assessment of Environmental and Social Risks, Sustainable Finance Trainings, SME Loans and SEMS⁽¹⁾, Clean Banking
Anti-Bribery & Anti-Corruption	Compliance with the anti-bribery and anti-corruption laws and regulations, clean banking rules, ethical principles and universal guidelines	
Diversity and Inclusion	To create an opportunity to embrace and support everyone, including vulnerable groups with awareness	
Human Rights	To create a work environment that respects human rights	
Zero Tolerance Towards Violence	Zero tolerance for all forms of violence in order to create a safe and supportive working environment for all our employees within the framework of our sustainability vision and strategies	
Remuneration	Aligned with BRSA and CMB's Corporate Governance Principles	
Donations and Contributions	Aligned with Capital Markets Law and Banking Law, donations up to max 0.4% of equity	
Supplier Code of Conduct	Implementation of compliance processes with the basic principles and policies expected from all suppliers	
Conduct Risk	To define the concept of Conduct Risk and explain its principles, factors, roles and responsibilities within the bank	<div>Monitoring</div> <ul style="list-style-type: none"> ▶ 24/7 Ethics Hotline ▶ In case of a possible breach: <ul style="list-style-type: none"> ● Evaluation by Internal Control ● Directed to Executive Vice President and Internal Audit

Double materiality analysis



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