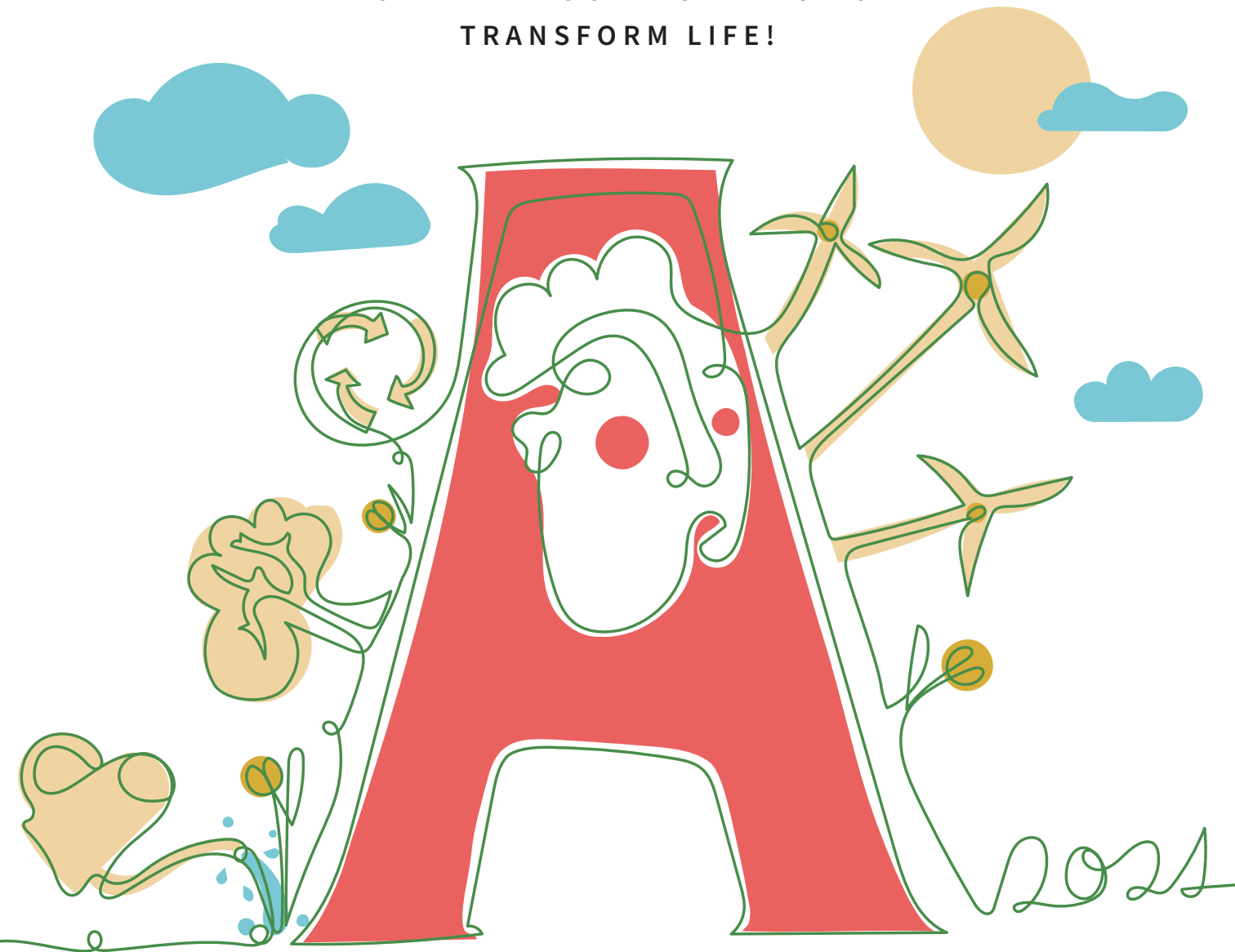


ACTIVE VALUE WITH
FORWARD-LOOKING IDEAS TO
TRANSFORM LIFE!



aktifbank

2021 | SUSTAINABILITY REPORT

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INTRODUCTION

Aktif Bank, Türkiye's largest privately-held investment bank, continues to serve as the most extensive fintech ecosystem of the country. With its subsidiaries, business partners, and over a thousand employees, Aktif Bank reaches its customers through physical and digital channels to offer a wide range of products and services in more than 10 sectors, including credit, insurance, transportation, security systems, payment systems, and entertainment.

Working with the goal of delivering financial products and services to all segments of society, Aktif Bank shapes its sustainability approach to create long-term value for the society. Accordingly, the Bank embraces the core principles of sustainability in all of its operations.

The Bank has prepared this sustainability report based on the Global Reporting Initiative (GRI) standards, as well as the Sustainability

Accounting Standards Board (SASB) criteria for materiality in the financial sector.

During the preparation of the Sustainability Report, Aktif Bank Senior Management and the Sustainability Project Team convened regularly to share information about the process and findings, as well as opinions and feedback.

This report embraces the principles of integrated thinking and reporting to demonstrate the usage and the value created by the six types of capital, alongside information about the company and its ways of doing business.

In line with the sustainability approach, the report features social, environmental and economic aspects, and the governance aspects necessary to establish a climate conducive to those, are presented in different sections.

This year's report, the second of its kind, covers Aktif Bank's activities in Türkiye, providing a detailed account of sustainability-related initiatives undertaken in 2021.

We hope you enjoy reviewing it.

Aktif Bank
shapes its sustainability
approach to create
long-term value for the
society.

In line with its sustainability approach, Aktif Bank strives to disseminate its corporate values and core principles of sustainability across the entirety of its operations.



MESSAGE FROM THE CHAIRMAN

The year 2021 marked an important turning point as vaccination efforts mitigated the impact of the pandemic, leading to a return to normalization. During this period, our agenda was greatly influenced by technological transformations and the rapid advancement of digitization. We also witnessed a growing emphasis on sustainability, which led to the

reevaluation of various key aspects of business, such as business models, work patterns, and strategic approaches.

As a Group that keeps a close eye on global developments and consistently upholds its values and remains committed to its business, society, and the world, we prioritize shaping our activities in accordance with the principles of sustainability, which we hold in high regard.

AktifBank, as Türkiye's most extensive fintech ecosystem, continued to add to its long list of accomplishment in 2021, driven by its vision of becoming the financial services organization with the widest reach in Türkiye and beyond.

As the largest privately-held investment bank in Türkiye, Aktif Bank aims to facilitate access to financial services for the entire society and build upon its scope of inclusion. Accordingly, the Bank has embraced an innovative business model focused on developing new products and services, enhancing financial inclusion and offering access to financial instruments for a wider audience in order to help them realize their potential.

The Bank focuses on promoting sustainable energy investments and supporting global development in this area through project financing activities and partnerships, especially in solar and wind power and biomass.

Furthermore, Aktif Bank also endeavors to support social, cultural, and sporting events and activities in the light of the principles of public benefit and respect for the environment. In line with its mission of creating lasting value for Türkiye, Aktif Bank undertakes social responsibility efforts by developing environment, education and culture & arts projects, as well as projects aimed at supporting women entrepreneurs.

In this second sustainability report, Aktif Bank takes a meticulous look at the needs, expectations, and improvement areas that are of material importance for its stakeholders. In doing so, the Bank identifies priority and material topics, which are used to create a development roadmap that involves a broad range of aspects, from sustainable management to effective risk management, digital

transformation to innovation and geographical diversity.

I believe that Aktif Bank's valuable endeavors, which advance not only its financial achievements but also its sustainability performance, will make valuable contributions to both our country's economy and group synergy. I would like to thank all Aktif Bank employees for their efforts in this endeavor.

Sincerely,

AHMET ÇALIK



As a Group that consistently upholds its values and remains committed to its business, society, and the world, we prioritize shaping our activities in accordance with the principles of sustainability, which we hold in high regard.



MESSAGE FROM THE CEO

Dear Stakeholders,

The concept of “sustainability,” which is the key priority of today’s world, is becoming more and more important for organizations as well. Although it has no single universal definition, sustainability encompasses numerous economic, social, and environmental aspects that need to be addressed in a holistic manner to the best of our ability.

Responsible behavior today is our inevitable duty if we are to ensure that future generations have access sufficient resources.

As the largest privately-held investment bank and the most extensive fintech ecosystem of Türkiye, Aktif Bank remains committed to upholding the principles of sustainability in all its operations. Our aim is to increase our financial inclusiveness day by day with a broad range of services, with the ultimate goal of making financial products and services accessible to much wider audiences. Our goal is to create benefit and lasting value for our country, economy, and society with our entrepreneurial approach and innovative solutions.

Our business model is based on a holistic approach and a focus on creating value. This approach involves six key capitals: human, financial, intellectual, relationship, produced, and natural, which we aim to use effectively to boost the value we generate.

With our customer-oriented service approach, unyielding commitment to quality, and the financing support we offer in the field of renewable energy, we have solidified our position from an investor perspective.

In addition to social responsibility initiatives in environment, sports, and culture, we have also enhanced our sustainability approach through innovative projects in 2021. We will continue to make strides in innovative endeavors that support the four main pillars of our sustainability strategy: digital banking, financial inclusiveness, renewable energy financing, and geographical diversification.

The second edition of our sustainability report was developed under the guidance of the Sustainability Ambassadors team, which comprises representatives from various units within our Bank. Sustainability Ambassadors provided a holistic assessment of our operations, and served as guides offering us insights about the needs, expectations and areas

of improvement with respect to internal and external stakeholders, with whom they worked in close cooperation.

I am delighted to share our roadmap for creating lasting value for our country and our society in this report, which also highlights the needs and expectations of our Bank’s stakeholders. I would like to express my heartfelt gratitude to our colleagues and stakeholders who played a vital role in the creation of Aktif Bank’s sustainability report, which we proudly present for the second time.

Sincerely,

AYŞEGÜL ADACA OĞAN



In addition to social responsibility initiatives in environment, sports, and culture, we have also enhanced our sustainability approach through innovative projects in 2021.



360
degrees

of services,
reaching over 10
million customers.

**TÜRKİYE'S MOST
EXTENSIVE FINTECH
ECOSYSTEM**

Aktif Bank, Türkiye's largest privately-held investment bank, continues to serve as the most extensive fintech ecosystem of Türkiye, thanks to its innovative business models and technology investments that redefine investment banking.

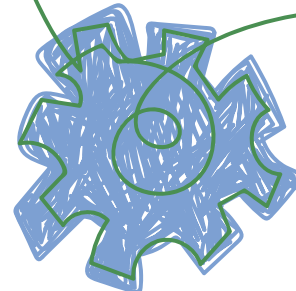
Guided by its customer-oriented approach, Aktif Bank, together with its fintech ventures and business partners, provides 360-degree services to over 10 million customers across more than 10 lines of business, from banking products to insurance, transportation to payment systems, and technology to entertainment.

With 12 branches across Türkiye, it focuses primarily on corporate banking, investment banking and private banking services.

The Bank offers a branchless and seamless end-to-end banking experience to retail customers via its digital banking branch, N Kolay. The Bank aims to position N Kolay, which it continued to expand in 2021 with the addition of new products and services, as the "Leading Digital Bank" in Türkiye.

Aktif Bank's has reached a total of 420,000 loan transactions through digital channels, alternative channels, and platforms. Digital platforms accounted for 38 percent of the Bank's retail loans.

Aktif Bank also reached 1 million new prepaid, debit, and credit cards, over 500,000 overseas money transfers, approximately 65 million bill payments, and 9.5 million transport cards.



In 2021, digital platforms
accounted for

38 percent
of the Bank's retail loans.

We

ARE THE
LARGEST FINTECH
ECOSYSTEM OF TÜRKİYE

Our Purpose

IS TO **FACILITATE ACCESS**
TO FINANCIAL PRODUCTS AND
SERVICES FOR EVERYONE.

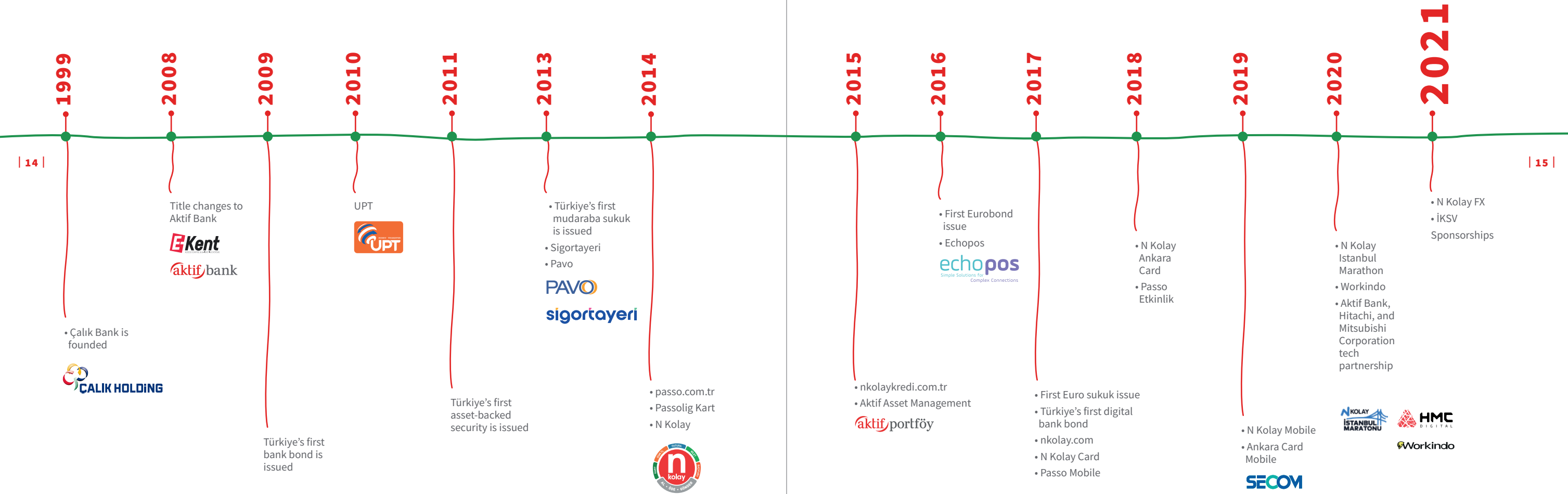
Capital and Shareholding Structure

The Bank's main shareholding and capital structure as of December 31, 2021 is as follows:

Full Name Commercial Title	Total Value of Shares	Share (%)	Paid Shares	Unpaid Shares
Çalık Holding A.Ş.	1.186.791	99,43	1.186.791	-
Çalık Denim Tekstil San. ve Tic. A.Ş.	3.597	0,30	3.597	-
Ahmet Çalık	1.599	0,13	1.599	-
Başak Yönetim Sistemleri A.Ş.	799	0,07	799	-
İrmak Yönetim Sistemleri A.Ş.	799	0,07	799	-
Toplam	1.193.585	100.00	1.193.585	-



MILESTONES



ABOUT AKTİF BANK

ECONOMIC DEVELOPMENTS AND THE BANKING INDUSTRY

2021 saw the economy begin to recover, despite the emergence of new variants of COVID-19. The spread of the pandemic was arrested with new vaccination campaigns, mitigating its impact on the economy. The Turkish economy experienced growth in the industrial sector, achieving an annual growth rate of 23.3% in the second quarter, aided by the base effect. With the influence of exports, Türkiye closed the year 2021 with a growth of 21%.

The pandemic has made a significant impact on the ways of doing business in Türkiye. While the effects of digitalization were already apparent prior to the pandemic, there was a more pronounced increase in the significance of e-commerce following the outbreak. In Türkiye, the share of e-commerce in total trade was around 9-10% in 2019, which increased to 15.7% in 2020 and further rose to 17% in 2021. (Source: eticaret.gov.tr). This transformation also had a positive impact on the proliferation of digital applications in the banking sector.

In developed countries, the monetary measures taken to mitigate the impact of the pandemic resulted in an increase in demand following vaccinations, creating a surge of inflation that

had been rarely witnessed in those countries for many years.

This forced central banks of those countries to raise interest rates in order to curb inflation. The interest rate hikes in these countries led to a shift of funds from developing countries to developed countries, resulting in capital outflows from Türkiye as well.

Banks underwent significant innovation and transformation to adapt to these changes. During this challenging period, banks implemented new working models to ensure the safety and well-being of their employees and made efforts to minimize the impact of the crisis on their workforce.

Two significant trends felt during the pandemic were the increasing impact of climate change and the rise in inequalities due to unemployment and economic hardships. These developments supported the notion that sustainability is now a strategic concern for all sectors. The Sustainable Development Goals provide an approach that draws attention to these issues and aims to develop solutions by 2030.

In a sense, the business world has emerged as a guiding force in this regard.

In the first half of 2021, the momentum of growth in credits, adjusted for both headline and exchange rate effects, declined due to tightened monetary policies. By mid-year, the growth rate of adjusted credit fell below 10% on an annual basis, but regained an upward momentum, particularly in the last quarter. As per the weekly statistics announced by the BRSA, the total credit growth in TRY terms for 2021 was 37% on an annual basis, while total deposit growth stood at 53.5%. Throughout the year, there was a trend of increasing balances in the foreign currency deposit accounts held by domestic residents. However, the dynamics were reversed towards the end of the year due to the measures taken and the introduction of new products. As a result, foreign currency deposit accounts of businesses grew on an annual basis, while individual account balances saw a decline. Looking at the annual growth rates of consumer loans, it was observed that personal loans remained robust. Yet, housing and vehicle loans saw weaker growth compared to headline rates.

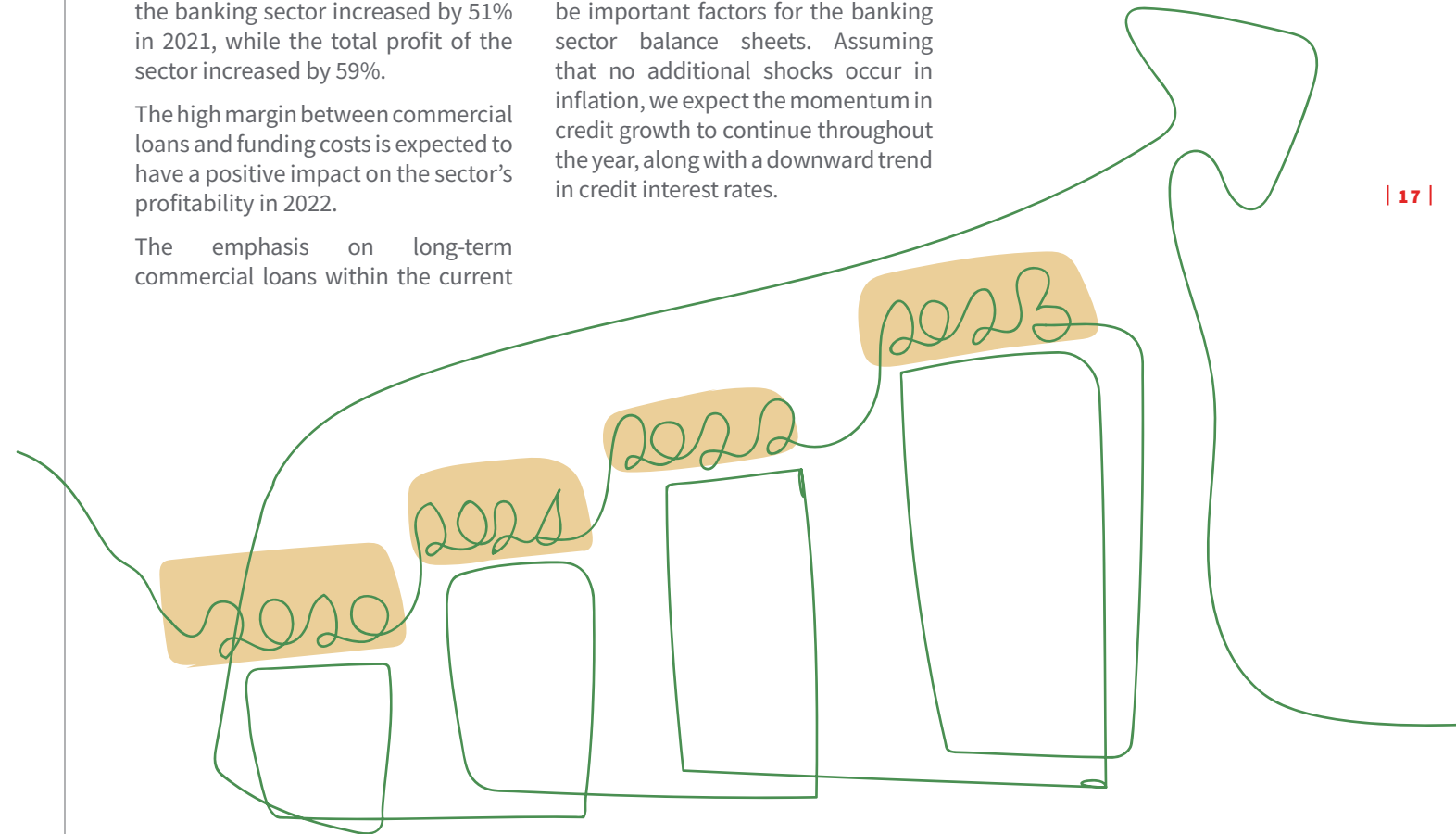
As of the last week of 2021, the ratio of non-performing loans to total loans stood at 3.26%. This result was partially due to the regulations introduced by the BRSA during the pandemic. According to the monthly data from the BRSA, the total assets of the banking sector increased by 51% in 2021, while the total profit of the sector increased by 59%.

The high margin between commercial loans and funding costs is expected to have a positive impact on the sector's profitability in 2022.

The emphasis on long-term commercial loans within the current

monetary policy indicates that lending appetite will continue. The growth in credits will be further bolstered by credit packages specifically designed to support the industrial sector. In 2022, both external financing conditions and inflation continue to be important factors for the banking sector balance sheets. Assuming that no additional shocks occur in inflation, we expect the momentum in credit growth to continue throughout the year, along with a downward trend in credit interest rates.

As a result, we anticipate that the credit deposit spread may decline somewhat from current levels.



ABOUT AKTIF BANK

OUR STRATEGY AND BUSINESS APPROACH

As an investment bank, Aktif Bank is not authorized to collect deposits.

The primary financing sources of the organization are:

- Its own capital,
- Borrowing via bonds and bills,
- Borrowing from international banks,
- Borrowing from domestic banks,
- Profits added to equity capital.

AKTIF BANK CREATES VALUE BY UTILIZING ITS RESOURCES WITH A FOCUS ON DIGITAL BANKING AND PROJECT FINANCE, GUIDED BY A STRATEGY THAT PRIORITIZES FINANCIAL INCLUSION AND GEOGRAPHICAL DIVERSITY. AKTIF BANK'S PHILOSOPHY OF CREATING MEDIUM- AND LONG-TERM VALUE IS REFLECTED IN ITS STRATEGY OF FOCUSING ON PROJECT FINANCE AND FINANCIAL INCLUSION.

Strategy

- Digital Banking
- Financial Inclusion
- Geographical Diversity
- Renewable Energy Financing

The Bank's areas of activity and primary operations in these areas explained below.

ABOUT AKTİF BANK

OUR STRATEGY AND BUSINESS APPROACH

AREAS OF ACTIVITY

HOW WE MAKE A DIFFERENCE

CORPORATE BANKING

- Finances renewable energy projects,
- Finances sports clubs,
- Extends corporate loans,
- Finances projects,
- Engages in factoring transactions,
- Engages in financial leasing transactions,

TREASURY AND PRIVATE BANKING

- Offers products tailored to customer needs and requests,
- Issues bills and bonds in line with customer expectations,

CAPITAL MARKETS

- Issues securities for domestic and international markets,
- Mediates security issuances of other organizations.

INTERNATIONAL BANKING

- Aktif Bank has business partnership with over 1,000 correspondent banks in 144 countries.
- Develops products geared towards foreign trade finance,
- Develops products geared at capital markets,

AREAS OF ACTIVITY

HOW WE MAKE A DIFFERENCE

DIGITAL BANKING

- N Kolay Mobile application:
1. With a broad investment limit ranging from TRY 200 to TRY 500,000, N Kolay allows retail customers from all income brackets to invest in bonds entirely through digital channels,
 2. Transfer money without any surcharges,
 3. Trade foreign currency,
 4. Pay bills,
 5. Take loans.
- **Passo Mobile** application is used for sport games, cultural and entertainment events, as well as money transfers and shopping,
 - **N Kolay Pay** application enables QR code payments in businesses, stores and digital platforms,
 - **Public Transport Cards** is a single-card solution for fare payments and shopping,

RETAIL BANKING

- **PTT channel** offers loans for pensioners,
- **Dealerships** provide consumer financing.

CUSTOMER EXPERIENCE AND COMMUNICATIONS

- A Customer Experience team has been formed with the primary goal of establishing fully customer-focused relationship and communication with customers and developing a customer-centric organizational culture. This team is positioned under the Customer Experience and Communication Group to represent the customer-oriented perspective in the Bank's management.
- The Bank prioritizes delivering the best and highest quality service to customers through all channels. Regular contact is made with customers to measure the Recommendation Score and Satisfaction Score, and the feedback obtained from these surveys is shared with the entire management and used as an input during the business and process improvement efforts of various business units.
- Establishing integrated communication at every customer touchpoint is a priority for the Bank and its subsidiaries, with the aim of actively taking customer feedback and providing tailored solutions that fulfill their needs.
- All marketing communication, corporate communication, sponsorship and event management, digital marketing, and customer experience is managed meticulously in line with the communication strategies and objectives of the Bank and its subsidiaries.
- Aktif Bank's digital bank N Kolay supports the Istanbul Marathon as the naming sponsor of the race, and organizes press meetings, events, and various communication activities.
- The Bank continues to engage with thousands of running enthusiasts throughout the year by supporting the "Istanbul Half Marathon" held in the historic peninsula and the stages of the "I Run Istanbul" event organized in various districts of Istanbul.
- N Kolay Digital Banking sponsors the Istanbul Film Festival and the Istanbul Theater Festival, while Aktif Bank Private Banking provides sponsorship support to the Istanbul Music Festival.
- The digital bank N Kolay has increased its support for music and sponsored summer concerts held in Harbiye, giving its name to the "N Kolay Harbiye Concerts".

ABOUT AKTİF BANK

SUBSIDIARIES

WE TOUCH THE LIVES OF OVER 10 MILLION CUSTOMERS WITH OUR ONLINE AND OFFLINE CHANNELS, DIVERSIFIED DISTRIBUTION NETWORKS, AND THE SYNERGY OF OUR SUBSIDIARIES.

Aktif Bank
 Financial Ecosystem

- E-KENT
- PAVO
- AKTİF ASSET MANAGEMENT
- SECOM
- UPT
- ECHOPOS
- EMLAK GİRİŞİM
- WORKİNDÖ
- SİGORTAYERİ
- N KOLAY PAYMENT AND ELECTRONIC MONEY INSTITUTION

E-Kent
 offers smart public
 transport solutions
 to approximately
8 million
 citizens.



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SUBSIDIARY



FIELD OF ACTIVITY

Providing smart urban solutions and systems integration services, E-Kent carries out 1 billion smart transport transactions annually. E-Kent brings technological transformation to the cities it serves while developing value-added business models for public administrations. E-Kent offers smart public transport solutions to nearly 8 million citizens in various provinces, including Türkiye's capital Ankara, and manages fare collection operations.

Since its inception, E-Kent has carried out 15.8 million smart transport card transactions and 379 million transport ticketing operations in total.

E-Kent has also successfully carried out the world's biggest stadium infrastructure transformation project, which involves entrance control and surveillance systems, integrated ticketing, stadium box office services, and infrastructure for 60 stadiums in 31 provinces in Türkiye.

Since April 2014, more than 20 million football fans entered stadiums using the e-ticket project of E-Kent, which sold over 10 million match-day tickets for over 4,000 games and more than 1 million seasonal tickets, generating revenues of around TRY 2.2 billion for sports clubs.

As part of its strategy to expand to international markets, E-Kent continued to market its software and hardware solutions overseas, with its products and services set to be used in the 2022 Qatar World Cup, football stadiums in Algeria, and football stadiums and running tracks in Senegal.

E-Kent, having entered the entertainment and event organization industry in March 2019, became the highest-revenue ticketing platform in Türkiye in 2021 by developing partnerships with leading event organizers of the country.

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ABOUT AKTİF BANK

SUBSIDIARY

FIELD OF ACTIVITY

UPT Ödeme Hizmetleri ve Elektronik Para A.Ş., Türkiye's first licensed payment institution and the only money transfer service provider that has both physical and digital presence, offers money transfer services in multiple currencies to cards and accounts both in Türkiye and abroad. UPT, which expanded its playing field by developing the UPTION application after obtaining an electronic money license in 2021, boasts a sizable network that enables money transfers in and to approximately 95 percent of all countries around the world. In this context, UPT has become one of the most wide-reaching payment providers worldwide.

Delivering innovative solutions by quickly adapting to the ever-evolving technological landscape and changing consumer behaviors in today's world, UPT stepped into the digital realm with the UPTION mobile application, which it launched in 2021. UPTION enables fully digital customer acquisition offering alternative payment and money transfer solutions for Turkish citizens and foreigners residing in Türkiye. Customers from 91 different nationalities residing in Türkiye signed up to the UPTION app and performed more than 46,000 transactions, creating a transaction volume of over TRY 3 million.

In 2021, UPT carried out 2.3 million transactions in 176 countries, achieving a transaction volume of more than TRY 11 billion. UPT expanded its service network and range of services by increasing the total number of contracted banks and payment providers abroad to 130.



Making great strides in its regional growth targets, UPT increased the number of markets of its UPT brand and system to 11 in 2021, demonstrating its commitment to becoming a true regional brand. UPT transactions between countries other than Türkiye rose 119% in 2021. In total, 57 overseas banks or payment providers from 62 countries utilized the UPT infrastructure to carry out money transfers to 59 countries. Working towards its aim of forging new partnership deals, especially in Russia & the CIS, UPT will continue to expand its operational footprint overseas in 2022.

The company has adopted a customer satisfaction-centric approach for both its physical locations and its mobile application UPTION. With a focus on enabling fast and low-commission international money transfers, UPT ensures the satisfaction of its customers who send money to their families and loved ones. With customer satisfaction positioned at the core of its operations, UPT plans to continue expanding its product range and increasing its regional footprint in 2022.

SUBSIDIARY

FIELD OF ACTIVITY



Sigortayeri Sigorta ve Reasürans Brokerliği A.Ş. expanded its partnerships in 2021, achieving growth in net sales revenues and further cementing its position as "Türkiye's largest domestic broker" providing insurance and consulting services to retail and corporate customers.

Sigortayeri expanded its digital services with partnership deals with leading players in the retail industry, enhancing the integration of its insurance capability into customer-based "ecosystems".

In line with its principle of facilitating access to financial services, Sigortayeri offered digitized services to customers with its range of customizable, comparative products that cater to the needs of end customers and robust retail insurance distribution network.

Offering corporate insurance solutions in different fields, Sigortayeri continued to take

part in the insurance placement of major projects in Türkiye and many other countries in the region. Sigortayeri took part in major insurance deals and financial insurance products in energy, construction, healthcare, textile, automotive and financial services industries, building on its considerable experience and market position in trade receivables insurance, bail bonds, engineering, professional liability, cyber risk and project finance insurance products that replace or supplement banking solutions.

In renewable energy, Sigortayeri developed a special insurance facility suitable for project development for the construction and operation phases of solar and wind power plants, enabling the company to maintain its sector leadership in WPP project insurance in 2021. The company serves as the insurance broker for 30% of Türkiye's solar power generation.



PAVO continues to expand its range of next-gen payment systems services to offer modern solutions to its clients, leveraging its robust R&D capabilities, experience, and expertise. Offering services with over 250,000 licensed cash register POS devices, PAVO has increased its market share to around 20% to become one of Türkiye's two most important players in software integration and value-added applications.

PAVO has been working to diversify its next-generation payment solutions since 2020, and

has adopted new business models in payment systems as introduced in the Communiqué No. 507 of the Ministry of Treasury and Finance of the Republic of Türkiye. The company has added "Operator Organization, Special Integration, Android Device Solutions, BKM (Interbank Card Center) Techpos, ERP" and project-based payment systems software development to its activities, and is collaborating with solution partners to deliver standardized products and turnkey solutions to its customers.

ABOUT AKTİF BANK

SUBSIDIARY



FIELD OF ACTIVITY

Echo Bilgi Yönetim Sistemleri A.Ş. commenced operations in August 2021 with the EchoPOS brand, and by the end of 2020, the company has completed over 13,000 software and hardware installations in 81 provinces of Türkiye, becoming a “Next-Gen Solution Partner” with end-to-end payment systems and integration solutions for front and back offices of enterprises.

EchoPOS is one step ahead of its competition

thanks to its high value-added products and services, simple, scalable and easy-to-integrate architecture, and user-friendly interface that can easily be customized to meet project requirements.

Having partnered with Türkiye’s leading retailers, EchoPOS provides a robust, error-free infrastructure for over 2 million daily transactions on average.

SUBSIDIARY



FIELD OF ACTIVITY

Aktif Asset Management was established in 2016 as an Aktif Bank subsidiary engaged in asset management under the CMB regulations. Aktif Asset Management leverages its extensive know-how and industry expertise to offer alternative revenue streams to investors via investment funds it creates and manages for various risk/yield expectations.

In addition to investment funds, Aktif Asset Management offers the high yield of real

economy to investors via investment capital and real estate funds, while its pension funds offer long-term solutions to customers in the pension system. Serving approximately 80,000 domestic and international corporate and individual investors, Aktif Asset Management continuously expands its funds portfolio by accurately forecasting emerging needs, and has reached TRY 4 billion in total funds after a period of rapid expansion in the last two years.



For 14 years, N Kolay has been proudly offering its customers easy access to reliable services through Türkiye’s largest and widest network in the payment services industry, with over 570 N Kolay Stores and 3,500 Shop-in-Shop locations.

Through its collaboration with the largest retail stores in the country, N Kolay has expanded its payment services to more than 9,000 locations, increasing the number of its physical service locations to over 13,000 in 81 provinces.

Providing services to its retail customers at physical locations, N Kolay also offers payment service provision to other industry players via its APIs. To serve this end, N Kolay cooperates with E-Para, a joint venture between the three GSM operators in Türkiye.

N Kolay handles approximately 80 million transactions annually, primarily comprised of bill collections and domestic/international money transfers, and acts as an intermediary in payment transactions worth TRY 7.2 billion.

With the Operational Expansion permit obtained from the Central Bank of the Republic of Türkiye at the end of 2020, POS services began to be provided to small and medium-sized enterprises during the year. In 2022, N Kolay is determined to achieve growth in POS services.

Leveraging the synergy created by the POS service it will offer, N Kolay also aims to provide services that cater to the financial needs of SMEs through a platform that integrates with banks.



Emlak Girişim A.Ş. was established to capitalize on business opportunities in real estate and construction, and engage in investment projects, particularly within the energy industry. The company is engaged in investments and activities across a diverse range of sectors, including renewable energy, electronic security solutions, and human resources consulting.

One of the most important investments by Emlak Girişim A.Ş. is the Istanbul International Finance Center (IIFC), one of the largest

regional planning projects of Türkiye with a construction site sprawling over 3 million square meters, set to be one of the top financial hubs across the globe.

Emlak Girişim A.Ş. also completed a significant investment as a profit and loss partner to the Metropol Istanbul project in the Ataşehir district. In addition, in 2017, the company became one of the leading players in the industry by investing in a 61 MWp solar power plant project. As of the year-end 2021, the company’s portfolio includes a solar power plant investment with a total energy generation capacity of 30.8 MWp, and biomass plant investments that will have a total energy generation capacity of 12 MWp upon becoming operational in 2022.

ABOUT AKTİF BANK

SUBSIDIARY



FIELD OF ACTIVITY

Developing products, systems, and services in line with the evolving security needs of today, SECOM offers innovative solutions that provide a sense of security for its retail and corporate customers. Since its establishment, SECOM has taken major steps to drive the digitization of physical security and built partnerships with the world's largest technology companies in order to integrate advanced security technologies developed in

Japan into its own security systems.

Endeavoring to minimize security concerns by analyzing all the requirements of the markets in which it operates, SECOM continues to demonstrate its sustainable quality approach with R&D efforts that contribute to security in Asia and the world at large.

SECOM has made great strides in digitizing physical security.



Workindo Teknoloji ve İnsan Kaynakları Danışmanlık A.Ş. was established in 2020 to offer solutions to the construction industry's problems of finding qualified personnel, quickly forming teams, and accessing materials and service providers. With its technological infrastructure, experienced team, smart strategies and the value it attaches to all stakeholders of the construction industry, Workindo grows and reaches a

broader audience with each passing day.

Actively operating in Türkiye, Russia, Ukraine, and Uzbekistan, Workindo aims to achieve a global presence by expanding into new countries and territories every year. As of today, Workindo boasts 400,000 registered members, 16,000 registered companies, 25,000 service requests, and 15,000 job postings.



OVERSEAS SUBSIDIARIES

KIC (Kazakhstan Ijara Company Joint Stock Company)

Founded in 2013 and having started operations in early 2014, KIC is the first financial leasing company in Kazakhstan to comply with Islamic rules and regulations. Offering leasing services to predominantly small and medium-sized enterprises (SMEs), KIC envisions becoming one of the largest private leasing companies in Kazakhstan within five years.

EMIC (Euro - Mediterranean Investment Company Ltd.)

Founded in Nicosia in 2015, EMIC is the first and only Islamic investment company in Cyprus and the biggest international investment company in the Turkish Republic of Northern Cyprus (TRNC).

Aktif Bank's Memberships

- Visa,
- Master Card,
- Interbank Card Center (BKM)
- The Banks Association of Türkiye (TBB)
- Call Centers Association,
- Interactive Advertising Bureau

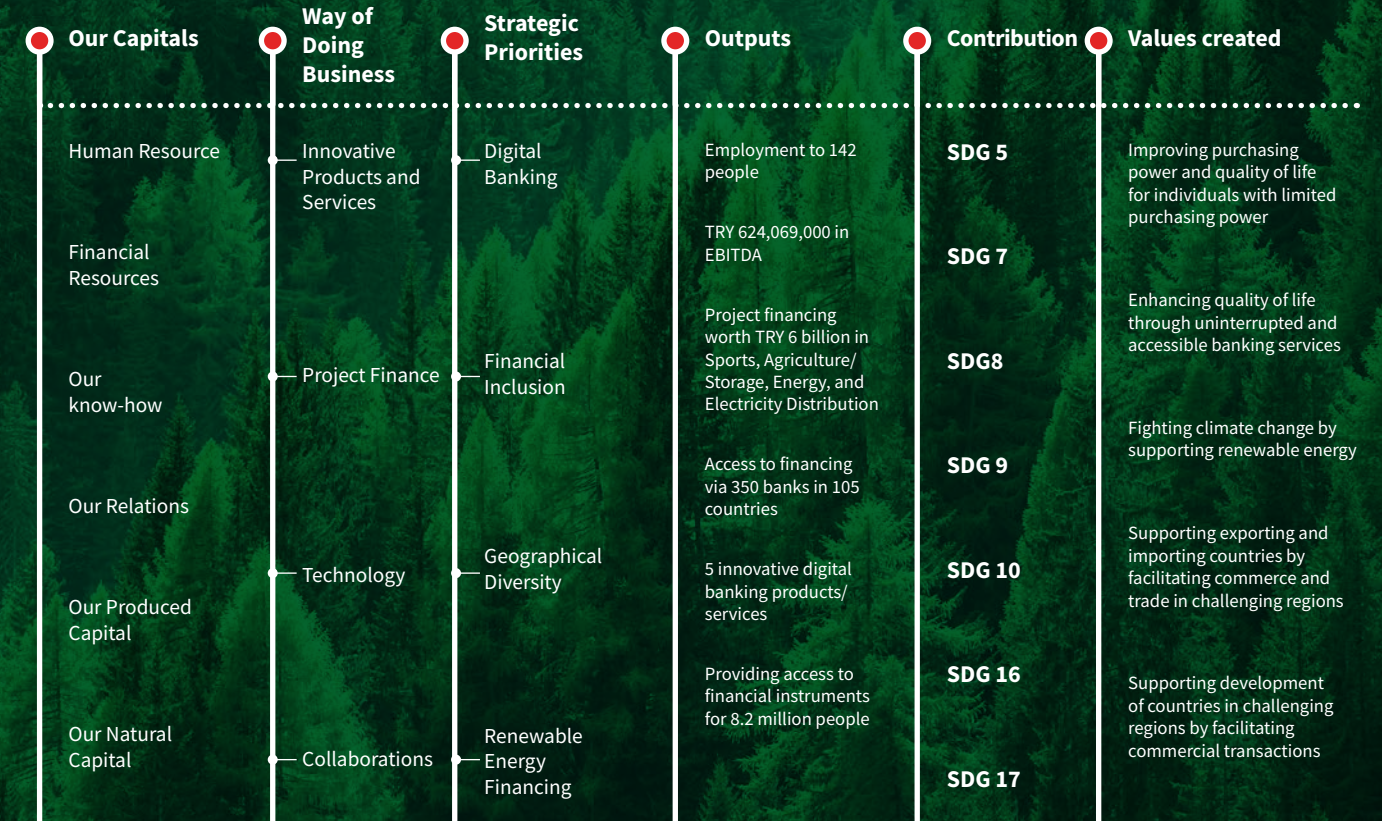
OUR BUSINESS MODEL

Aktif Bank has built its business model around integrated thinking and a focus on creating value. The Bank aims to effectively use the six key capitals that this integrated thinking approach involves (human, financial, intellectual, relationship, manufactured and natural) to boost the value it generates.

Enhancing financial inclusion is a key mission for Aktif Bank. Global examples have shown that that progress can be achieved in this regard through digital applications. Guided by this perspective, the bank emphasizes digital banking and enables many transactions to be carried out directly through digital applications, limiting costs and eliminating the need to visit the bank physically. Furthermore, the Bank provides credit opportunities to pensioners through its business partners, contributing to an increase in their purchasing power. Another crucial partnership in this area is financing opportunities provided through sales networks.

Financing renewable energy projects is a priority area within the Bank's strategy. These credits are provided in the form of project financing, and the progress of projects is closely followed. After project completion, the Bank closely monitors the repayment period, providing significant support in terms of risk management.

Technology is one of Aktif Bank's most important strategic focus areas. Through investments, subsidiaries, and fostering entrepreneurship in this field, the Bank aims to reinforce its strong position in the industry.



Aktif Bank achieves
profit growth
through its unique
business model.

ABOUT AKTİF BANK

FINANCIAL HIGHLIGHTS

FINANCIALS	2021 (Bin TL)	2020 (Bin TL)	Değişim Oranları
FINANCIAL ASSETS AT FAIR VALUE THROUGH OTHER COMPREHENSIVE INCOME	7,996,189	5.450.936	46.69%
LOANS & FACTORING RECEIVABLES (NET)	14,550,254	10.442.466	39.34%
SHAREHOLDERS' EQUITY	2,862,107	2.359.715	21.29%
TOTAL ASSETS	34,482,593	21.182.781	62.79%
GUARANTEES AND INDEMNITIES	4,466,204	2.117.288	110.94%
NET INTEREST INCOME	1,249,902	905.319	38.06%
EBIT	918,910	591.214	55.43%
NET PROFIT	696,063	450.644	54.46%

PERFORMANCE RATIOS	2021	2020
CAPITAL ADEQUACY STANDARD RATIO	13,75%	14,39%
AVERAGE RETURN ON EQUITY	26,66%	20,88%
RETURN ON AVERAGE ASSETS (NET PROFIT BASIS)	2,50%	2,31%
NON-PERFORMING LOANS / TOTAL CREDITS	3,00%	2,96%
INTEREST INCOME / INTEREST EXPENSE	169,29%	182,93%
EARNING ASSETS / TOTAL ASSETS	71,09%	81,73%

MATERIALITY

The 2021 Sustainability Report encompasses Aktif Bank's activities and initiatives. The sustainability report is prepared by a project team with members from various departments.

The team consisted of bank employees from various departments with the knowledge and experience necessary to provide

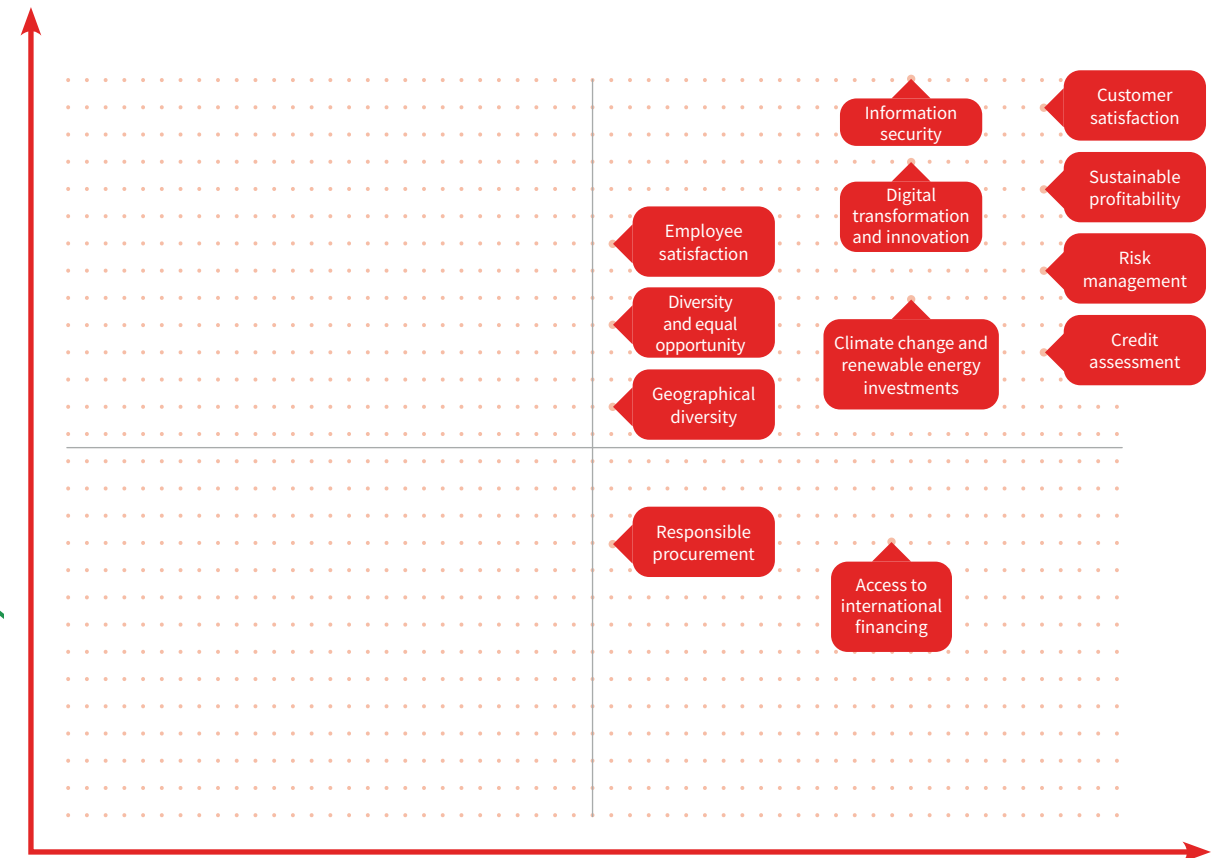
The team members worked in close contact with internal and external stakeholders, and as such, benefited from an in-depth insight on their needs, expectations, and areas of improvement.

The process of determining the material topics was done by the project team. Although external stakeholders were not directly involved in the creation of the report, their opinions are still represented in here, as the team members worked closely with external stakeholders and had an in-depth understanding of their needs. The definition of stakeholder as well as communication methods, requirements and frequencies are specified in the report, which also provides a roadmap and planning for future improvements.

The material topics identified by the project team were initially submitted to the senior management for approval, and were finalized following the evaluation of the senior management. Upon the approval of the senior management, the final version of the materiality matrix was presented to the Board of Directors for final approval.

a holistic assessment of the bank's efforts, showcase the interactions between different departments, and assess the impact of bank activities on both internal and external stakeholders.

Importance for Stakeholders



Importance for the Organization

MATERIAL TOPIC

WHY IS IT A MATERIAL TOPIC?

HOW IS IT MANAGED?

Sustainable Profitability

Sustainable profitability is crucial for the continuity of a business. A business that is not profitable cannot continue its activities. A business that cannot continue its activities cannot create value for its stakeholders.

Aktif Bank employs a growth strategy that aims to keep costs at a sustainable level. The Bank prioritizes digital channels in its investments. It develops applications and improves processes with a view to increasing quality of life for customers. Instead of expanding its branch network, the Bank increases its service reach and profitability by leveraging its subsidiaries and dealerships and continuously monitoring the quality of service provided from those channels.

Digital Transformation and Innovation

Digital channels are becoming increasingly prevalent in the banking industry. Banks that fall behind the curve in this context are certain to face a competitive disadvantage. On the other hand, investing in digital channels and developing innovative products will both enhance their competitive edge and drive their growth by keeping their costs in check. It will also improve their reach to younger audiences.

Aktif Bank invests in digital channels and develops innovative products, both in-house and via its subsidiaries. This has enabled the Bank to reach a retail customer base of over 10 million. Increasing product diversity and new products geared towards different market segments have had a positive impact on both market share and profitability.

Corporate Governance

Good governance increases decision quality of organizations. Disseminating corporate strategy across all levels of the organization from the Board of Directors downwards and taking informed decisions based on corporate values is only possible with an effective corporate governance.

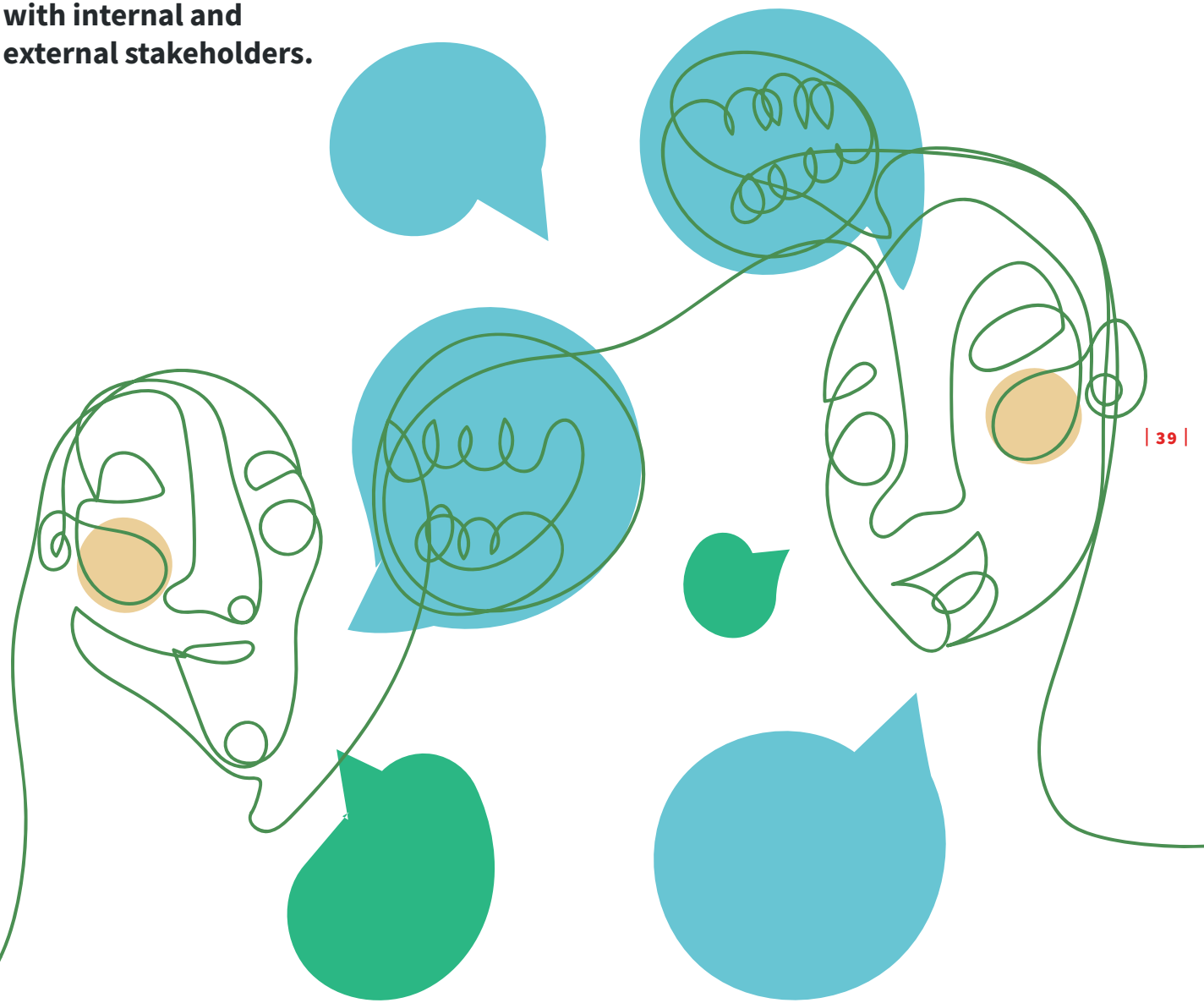
Aktif Bank directors have the knowledge, experience and competencies required from their position. The Board of Directors convenes regularly and plays an active role in assessing the Bank's exposure and devising its credit approach, policies and strategies. It also plays a pioneering role in propagating the corporate culture across the organization.

Inclusive Financial Solutions

Delivering financial products to disadvantaged groups within a society help drive economic growth and development while increasing the quality of life for such groups in the long term. Traditionally, banks do not have a high appetite to provide services to disadvantaged groups. Actively offering products to this market at a manageable risk level would make a positive impact on the growth and profitability of a bank.

Aktif Bank is engaged in the financing of disadvantaged groups via its dealers and its PTT channel. Particularly commodity based financing via dealers and the financial solutions geared towards pensioners offered through the PTT channel allow for delivering inclusive financial solutions to the said group while also better managing exposure through diversification.

Sustainability Ambassadors
work in close contact
with internal and
external stakeholders.



ABOUT AKTİF BANK

MATERIAL TOPIC	WHY IS IT A MATERIAL TOPIC?	HOW IS IT MANAGED?
Effective Risk Management	Risk management in banking is vital for the sustainability of organizations. As banks predominantly manage assets of others, they have to manage liquidity, interest, maturity, foreign currency, systemic, etc. risks effectively.	Aktif Bank embraces an effective risk management approach. For more information about the approach, please visit the Risk Management section under Corporate Governance.
Customer Satisfaction and Confidentiality of Customer Information	<p>Ensuring that customers are satisfied with the product and services offered, and their quality, is vital for the survival and sustainable profitability of a business.</p> <p>Meanwhile, it is essential that customer data is kept confidential, and used and processed in line with the Personal Data Protection Law in order to maintain the organization's reliability and reputation in the eyes of stakeholders.</p>	<p>Aktif Bank's customer satisfaction policy guides the Bank to keep in close contact with customers to gain insights about their needs, expectations and demands, which is translated into products tailored to their needs.</p> <p>Customer data security is one of the Bank's highest priorities. Aktif Bank assigns great importance to the security of its information systems. The Bank holds the ISO 27001 Information Security certification, and is audited on an annual basis. It also ensures compliance with the provisions of the Personal Data Protection Law.</p>
Environmental Sustainability/Credit Assessment Criteria	Protection of the environment is essential for the continuity of life on our planet. It is essential for the Bank to plan projects that will be financed as part of project and investment financing activities in a manner that will avoid any harm to the environment. By backing this approach with suitable credit assessment processes, the Bank can ensure that the projects financed meet the required standards.	As such, Aktif Bank has adapted its credit assessment processes accordingly to take into account environmental risks.

MATERIAL TOPIC	WHY IS IT A MATERIAL TOPIC?	HOW IS IT MANAGED?
Climate Change/Renewable Energy Investments	<p>Climate change is one of the most pressing issues the world faces today. As such, it is essential to provide financing for projects that have the potential to contribute to the fight against climate change.</p> <p>The energy industry has one of the most profound impacts on climate change. Moving from fossil-based fuels to renewable energy sources would make it possible to attain the goal of zero emissions.</p>	Aktif Bank attaches great importance to the fight against climate change. It provides funding to renewable energy generation projects, as guided by its policies.
Geographical Diversity	The Bank's presence and contacts in a diverse geography would allow the organization to seize new business opportunities and develop novel products. This also contributes to business continuity by spreading the country risk.	Through its network of correspondent banks in Africa, Middle East, Balkans and Asia, particularly in China, Aktif Bank facilitates financing and business processes of Turkish exporters while also increasing its own business volume and profitability by acting as an intermediary in transactions between these regions and Türkiye.
Supporting Employee Satisfaction and Development	Employees are the most valuable assets of an organization. Happy and competent employees support creativity and innovation while also contributing to the effective and productive working environment. This allows employees to adapt to changing conditions to increase their performance in their tasks.	<p>Aktif Bank regularly assesses employee satisfaction.</p> <p>The Bank offers development opportunities using internal and external resources.</p> <p>Meanwhile, there is an orientation program to speed up onboarding of new recruits.</p>

ABOUT AKTİF BANK

MATERIAL TOPIC

WHY IS IT A MATERIAL TOPIC?

HOW IS IT MANAGED?

Responsible
Procurement and
Supply Chain

Organizations play an important role in promoting the development of their business partners. In time, responsible procurement practices can transform the practices of partners on the supply-chain, making these compatible with the requirements of a sustainable future.

Aktif Bank works to ensure the compliance of its procurement policy with a view to managing its procurement operations in accordance with the criteria of sustainability.

Building Better
Relationships with
International Financial
Sources

As an investment bank, Aktif Bank's main sources of financing are its capital, the securities it issues, and borrowings from domestic and international banks. Obtaining funds from outside Türkiye is important from both a cost and maturity risk management perspective. A wide network of correspondent banks is particularly important as it provides both transaction variety and access to diverse markets. Overseas business partners also contribute to security issuances.

Aktif Bank benefits from an expansive network of correspondent banks and business partners. It is also actively working to further expand this network.

Equal Opportunity
and Diversity

Equal opportunity and diversity enables an organization to reach the entirety of the talent pool and attract people of with the required competencies. This enables all members of the society to develop their skills and take their part in the talent pool. It also contributes to economic development.

Aktif Bank attaches great importance to equal opportunity and diversity. The Bank's philosophy and practices in this context is explained in detail in the Talent and Development section under Diversity and Equal Opportunity.



WE CREATE VALUE FOR / STAKEHOLDERS

AKTIF BANK’S STRATEGIES ARE DEVELOPED WITH THE AIM OF CREATING VALUE FOR ALL STAKEHOLDERS. AS PART OF THIS APPROACH, THE BANK AIMS TO ACHIEVE THIS GOAL BY CLOSELY COLLABORATING WITH ITS STAKEHOLDERS. THIS SECTION DETAILS AKTIF BANK’S STAKEHOLDERS AND ITS APPROACH TO STAKEHOLDER RELATIONSHIP MANAGEMENT.

STAKEHOLDERS	COMMUNICATION PURPOSE	COMMUNICATION METHOD	COMMUNICATION METHOD
Shareholders	To share important news and developments	Board Meetings, General Assembly Meetings and Reports	As necessary and in accordance with meeting frequency
Holding Departments	To ensure coordination and share project-based information	Meetings, phone and digital channels	Several times each month
Employees	To communicate Talent and Development processes and as part of internal communication activities and announcements	One-on-one discussions, meetings, phone, digital channels, internal communication platform	Daily
Potential Recruits	To attract new talent in line with organizational needs	Job placements, social media, invites, interviews	As necessary
Private Banking Customers	To offer tailored banking products and to increase profitability and customer satisfaction through cross-selling or upselling	Branches, Asset Managers, Branch Manager visits, calls, SMS, email, notifications	Monthly, weekly or monthly based on maturity dates, interest rate increases, new product-campaign launches.

STAKEHOLDERS	COMMUNICATION PURPOSE	COMMUNICATION METHOD	COMMUNICATION METHOD
Digital Banking Customers	To acquire and retain customers, increase product penetration and profitability through engagement, promotion, recovery and cross sales, and to carry out loyalty programs	Calls, SMS, email, notifications, IVN, digital advertisements	Monthly, weekly or monthly based on maturity dates, interest rate increases, new product-campaign launches. Limited to 2 marketing communications per customer per week from the same channel
Dealers and PTT	Involves both the employees and customers of distribution channels (PTT/dealers). As distribution channel employees handle most of the one-on-one sales activities, they represent the primary target of frequent communication activities. These include product information, customer complaint handling and remediation of issues specific to the distribution channel. Communication activities also involve offering solutions to customer problems. Aktif Bank is the only bank to carry out loan transactions with PTT.	One-on-one communications with field sales and dealership personnel, PTT personnel, and when necessary, customers. Head office also contacts customers via SMS, email, phone and notifications	Weekly for PTT/dealership employees. 1-2 bulk messages to customers as necessary.
Corporate Banking Customers	To notify loan and interest maturities, collect information/requests in accordance with business needs, conduct project-based meetings with firms, promote bank products, offer detailed information about export financing (via international banking network) and foreign trade transactions, commodity finance, SPP investment project financing	Coordinated communication activities with Branch Manager, Branch Corporate Asset Manager, Corporate Finance, Corporate Marketing and International Banking teams based on representation level, need and point of contact	Extensive daily, weekly or monthly communications based on requirements
Card Customers	To increase Passo Card, Passolig Card, Ankara Card and N Kolay Card usage and enhance customer profitability and engagement through cross sales	Acquisition calls, SMS, email, notifications, IVN, digital ads	Varies depending on the customer needs. Limited to 2 marketing communications per customer per week from the same channel

WE CREATE VALUE FOR / STAKEHOLDERS

STAKEHOLDERS	COMMUNICATION PURPOSE	COMMUNICATION METHOD	COMMUNICATION METHOD
Subsidiaries	To maintain regular communications with all subsidiary personnel	All HR processes of subsidiaries are managed centrally by the Aktif Bank Talent and Development team manages. Subsidiary Board of Directors convene monthly, and Aktif Bank CEO attends these meetings as the Chairman. Relevant Aktif Bank EVPs also attend the monthly executive board meetings. The Bank also maintains close contact with subsidiaries in projects. Many of the subsidiary operations are managed centrally by Aktif Bank. This includes their communications activities, which are also managed centrally by the Customer Experience and Communications group	Regularly with all subsidiaries
NGOs	Collaboration for employee oriented activities as part of Talent and Development efforts	Event-based	As necessary based on project requirements
Public Agencies	To collect statistical information as part of new product releases, communique and law changes.	Regular or as necessary, based on reporting activities, as part of visits or workshops	Extensive daily, weekly or monthly communications based on requirements
Regulatory Authorities	To inquire about opinions, comments, compliance procedures with new laws, reporting	Regular statutory reporting activities, visits, bank audits and through various licensing processes	Extensive daily, weekly or monthly communications based on requirements

STAKEHOLDERS	COMMUNICATION PURPOSE	COMMUNICATION METHOD	COMMUNICATION METHOD
International Financial Institutions	To conduct Aktif Bank's foreign trade, treasury and overseas money transfer operations with correspondent banks, or for securing external financing	Phone, email, visits, international meetings, digital channels	Extensive daily or monthly communications based on requirements
Press	To organize campaigns, press releases, launches, advertisements, sponsorships, or disclose bank partnerships	Via Customer Experience and Communications Group	As necessary or as part of periodic activities
Agencies	To communicate and coordinate campaigns, bank partnerships, press releases, launches, advertisements, sponsorships with Aktif Bank's primary communications agency, digital agencies, PR agency, performance agencies and media procurement agencies	Using the methods jointly identified by business units and the Customer Experience and Communications Group based on needs	Extensive daily or monthly communications based on requirements
Suppliers	To communicate with regular and on-demand suppliers	Via the Support Services department for regular suppliers	Daily
Training and Consultancy Providers	To meet the Bank's training needs	One-on-one discussions, meetings, phone, digital channels	As necessary
Tech Enterprises	To find business partners in upcoming projects	One-on-one discussions, meetings, phone, digital channels	As necessary

WORKING PRINCIPLES OF THE BOARD OF DIRECTORS

The Banking Law and relevant legislations, the Turkish Commercial Code, Aktif Bank's Articles of Association and Regulation on Board of Directors regulate the powers and responsibilities of the Bank's Board of Directors, which operates to ensure the Bank's progress towards its strategic goals in line with its mission, vision, and values.

All administrative operations, documentation, archiving, and secretarial activities of the Board are conducted by the Board of Directors Private Office. The Board of Directors Private Office operates under the supervision and control of the Chairman/Deputy Chairman and serves all Board Members. Aktif Bank pledges to exercise utmost diligence in the implementation of the Corporate Governance Principles. The Bank's Board of Directors and Senior Management carry out their duties and responsibilities guided by the principles of transparency, inclusion and equality while prioritizing the Bank's profitability and the interests of shareholders and other stakeholders. Meetings are held whenever necessitated by the Bank's operations and in any case at least 12 times per year.

All administrative operations, documentation, archiving, and secretarial activities of the Board are conducted by the Board of Directors Private Office.

MEMBERS OF THE BOARD OF DIRECTORS



Ahmet Çalık
Chairman

Born in Malatya in 1958, Ahmet Çalık began his own personal enterprise in textile in 1981 as a member of a family that has been engaged in the textile industry since 1930. Ahmet Çalık is a leading player in Türkiye and international economic arena with sustainable investments in seven sectors, namely energy, construction, mining, textile, telecom, finance and digital, which he brought under the same roof in 1997 with the foundation of Çalık Holding.

Ahmet Çalık's visionary philosophy drives him to invest in projects that benefit people and the society at large, and his activities across the globe and long-term collaborations with international enterprises have earned him a well-deserved reputation for integrity and reliability.

Ahmet Çalık was awarded numerous honors in Türkiye and abroad, including Japanese Order of the Rising Sun with Gold Rays and Neck Ribbon, Turkmenistan Order of the State, Magtymguly International Prize and Gaýrat Medal, US Ellis Island Medal of Honor, and Republic of Türkiye State Medal of Distinguished Service Medal, Ministry of the Exterior Distinguished Service Medal and the Grand National Assembly Distinguished Service Award. Ahmet Çalık was granted the title Honorary Consul of the Republic of Kazakhstan in Bursa, and holds honorary PhDs from Matsumoto Dental University and Kindai University in Japan, University of Tirana in Albania and Malatya Turgut Özal University. Ahmet Çalık is currently serving as the Chairman of Çalık Holding and its group companies.



Mehmet Usta
Deputy Chairman

Born in 1950, Mehmet Usta graduated from the Economics and Finance Department of Eskişehir Academy of Economics and Commercial Sciences. He has a background of more than 40 years in banking. He served as inspector and manager in Anadolu Bank between 1979 and 1979/1987 and held senior management positions in Emlak Bank, both in Türkiye and abroad in the Netherlands and France, between 1987 and 1987/1994. From May 1994 to March 2007, he served at Banque du Bosphore, Paris as the General Manager and Board Member, and in April 2008, he joined Aktif Bank as the Deputy Chairman. In December 2008,

he assumed the position of Deputy Chairman at Çalık Holding company Banka Kombetare Tregtare Albania before becoming Chairman in July 2009.

He has also been the Founding Chairman of Banka Kombetare Tregtare Kosovo since May 2018. Since May 2012, he has been a Board Member of the Brussels-based WSBI (World Savings and Retail Banking Institute), and from March 2015 onwards, he has held the title of Chairman at Aktif Bank subsidiaries UPT Ödeme Hizmetleri A.Ş., Sigortayeri Sigorta, and Reasürans Brokerlik A.Ş.

MEMBERS OF THE BOARD OF DIRECTORS



Veysel Şahin
Board Member

Born in 1959, Veysel Şahin has a degree in Public Administration from Ankara Academy of Economic and Commercial Sciences. He received his master's degree in Business Administration from Bahçeşehir University. He has 36 years of experience in banking, and is a certified public accountant and independent auditor. He started his career in banking as a deputy inspector in 1985. He served as an inspector, department and branch manager, overseas representative and Chairman of the Inspection Board at Anadolu Bank, Emlak Bank, Ziraat Bank International AG and Ziraat

Bank. He was a member of the Audit Committee of Axa Insurance and a Board Member of TKI Bank Kazakhstan.

In 2009 Şahin joined Aktif Bank as a Board Member and since then he has served as the Audit Committee Chairman and Corporate Governance Committee Member. He is also the Chairman of the Board of Aktif Bank subsidiary N Kolay Payment Institution and a member of the Audit Committee at GAP İnşaat.



Kemaleddin Koyuncu
Board Member

Born in 1970, Kemaleddin Koyuncu studied Business Administration at Middle East Technical University and received an MBA from the University of Illinois at Urbana-Champaign. Koyuncu has a professional background of 29 years. He began his career in banking in 1992 as a deputy inspector at Türkiye İş Bankası A.Ş. Between 1996 and 2001, he served as a Treasury Specialist at the Republic of Türkiye Prime Ministry Undersecretariat of Treasury. From 2001 to 2015, he worked as a Banking Specialist, Deputy Head of Department,

Senior Chief Specialist of Banking, Department Head and Deputy Department Head at the Banking Regulation and Supervision Agency (BRSA). Between 2003 and 2004, he sat on the Board of Toprak Sigorta/Ege Sigorta.

He joined Aktif Bank in 2015 as Executive Vice President. Since September 2017, he has served as a member of the Board and the Audit Committee of Aktif Bank.



Tarık Başara
Board Member

Born in 1961, Tarık Başara graduated from Istanbul University Faculty of Business Administration. Başara has over 30 years of experience in banking, which he began at Türkiye İş Bankası as inspector in 1986. From 1993 to 2003, he worked at İşbank GmbH where he was responsible for managing organization, accounting and information technologies departments, and took part in several restructuring and IT projects. Başara returned to Türkiye in 2005 to rejoin Türkiye İş Bankası where he

served as unit head at the Subsidiaries Department between 2005 and 2007, led various branches from 2007 to 2012, and worked as Department Head of Banking Core Operations from 2012 to 2017 before his retirement from the company.

Since April 2019, Başara has been a member of the Board of Directors and the Audit Committee at Aktif Bank.

MEMBERS OF THE BOARD OF DIRECTORS



Dr. Serdar Sümer
Board Member

Born in 1973, Serdar Sümer holds a degree in Business Administration from Ankara University Faculty of Political Sciences. He completed his master's in Business Administration at the College of William and Mary in Virginia, USA, and in April 2011, received a PhD in banking at the Marmara University Institute of Banking and Insurance. Sümer is a certified Financial Risk Manager (FRM) and Certified Public Accountant. He started his career in 1996 as a Sworn-in Bank Auditor. From 2008 to 2014, he served as the Executive Vice President of Subsidiaries Management and Capital Markets at Aktif Bank. During this period, he pioneered the introduction of various innovations in the Turkish capital markets, such as bank

bonds, ABS, Participation Certificates, and lease certificates.

After working as an executive at an industry-leading investment company in Türkiye, Sümer returned to Aktif Bank in 2015 to assume the role of CEO, and served as the Bank's CEO and Board Member until 2020. Since 2021, he has served as a Board Member of Aktif Bank and its subsidiaries, as well as a Board Member of Çalık Holding and the Holding's various investments in the Finance, Telecom and Energy sectors.



Ayşegül Adaca Oğan
CEO and Board Member

Born in 1974, Ayşegül Adaca Oğan has a bachelor's degree in Civil Engineering from Boğaziçi University, and a master's degree from Stanford University. Oğan joined Aktif Bank in 2015, and has 22 years of experience in the banking industry.

As of 2021, she assumed the role of the CEO, and also serves as a Board Member of Aktif Bank and its subsidiaries.

GOVERNANCE

BOARD COMMITTEES

THE BANK HAS ESTABLISHED MANDATORY INTERNAL BODIES PURSUANT TO THE BANKING LAW NO. 5411 AND THE RELEVANT LEGISLATION. THESE INCLUDE THE CREDIT COMMITTEE, THE AUDIT COMMITTEE, THE CORPORATE GOVERNANCE COMMITTEE AND THE REMUNERATION COMMITTEE.

AUDIT COMMITTEE

In order to assist with its audit and supervision duties, the Board of Directors has appointed two of its members, who meet the criteria stipulated by the Banking Regulation and Supervision Institution (BRSA),

to form the Audit Committee. These directors are tasked to jointly supervise the administration, management and execution of the departments within the scope of internal systems under the title of internal systems officers. On behalf of the Board of Directors,

the Audit Committee supervises the efficiency and adequacy of the Bank's internal systems and the functioning of these systems as well as accounting and reporting systems in line with the Banking Law, other relevant legal provisions and internal bank regulations, and ensured the integrity of the information produced. It conducts preliminary assessments to assist the Board of Directors in the selection of independent audit companies as well as rating, appraisal and support service providers. It regularly monitors the activities of firms selected by the Board of Directors and subsequently signed contract with, and ensures the consolidated delivery and coordination of internal audit activities covering all departments/units/branches.

It submits an audit report to the Board of Directors at least once every six months.

Audit Committee Members: Kemaleddin Koyuncu, Chairman; Tarık Başara, Member



Acting on behalf of the Board of Directors, the Audit Committee supervises the efficiency and adequacy of the Bank's internal systems.



CREDIT COMMITTEE

The Credit Committee is composed of the CEO and two members elected among those Board Members who meet the qualifications required of the CEO, with the exception of years of experience. The committee exercises the authority to open credit lines as delegated by the Board of Directors.

Credit Committee Members: Mehmet Usta, Chairman; Serdar Sümer, Member; Ayşegül Adaca Oğan, Member

CORPORATE GOVERNANCE COMMITTEE

The Corporate Governance Committee is responsible for monitoring the Bank's compliance with corporate governance principles (mission and vision, corporate values and code of conduct, articles of association, internal policies, interbank regulations, etc.), improving compliance with corporate governance principles and presenting relevant suggestions to the Board of Directors.

The Corporate Governance Committee meets once a year, or more frequently when necessary, with all members attending. Other participants may also be invited to meetings by the Committee Chairman. The Bank's Corporate Governance Principles Compliance Report is prepared and published on the corporate website on an annual basis.

Corporate Governance Committee Members: Mehmet Usta, Chairman; Serdar Sümer, Member; VeySEL Şahin, Member

REMUNERATION COMMITTEE

The Remuneration Committee is responsible for evaluating the remuneration policy and practices established by the Head Office within the context of risk management. The Committee reports its suggestions to the Board of Directors on an annual basis.

The Remuneration Committee holds ordinary meetings once a year and extraordinary meetings when necessary, with all members attending.

Remuneration Committee Members: Mehmet Usta, Chairman; Serdar Sümer, Member

**BOARD AND COMMITTEE MEMBERS' ATTENDANCE
TO MEETINGS**

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2021	2020	2019
<ul style="list-style-type: none">• In 2021, the Board of Directors convened 12 times with the necessary majority and quorum.• The Audit Committee convened 4 times in 2021; 4 of those meetings were attended by the independent auditors.• The Credit Committee convened 22 times in 2021.• The Corporate Governance Committee convened twice in 2021.• The Remuneration Committee convened twice in 2021.	<ul style="list-style-type: none">• In 2020, the Board of Directors convened 12 times with the necessary majority and quorum.• The Audit Committee convened 4 times in 2020; 4 of those meetings were attended by the independent auditors.• The Credit Committee convened 19 times in 2020.• The Corporate Governance Committee convened twice in 2020.• The Remuneration Committee convened once in 2020.	<ul style="list-style-type: none">• In 2019, the Board of Directors convened 12 times with the necessary majority and quorum.• The Audit Committee convened 5 times in 2019; 4 of those meetings were attended by the independent auditors.• The Credit Committee convened 12 times in 2019.• The Corporate Governance Committee convened twice in 2019.• The Remuneration Committee convened twice in 2019.

Election of Board Members

Members of the Aktif Bank Board of Directors are elected pursuant to Article 32 of the Bank's Articles of Association and the provisions of the Banking Law. As per the Banking Law, in the absence of the CEO, the Deputy CEO is automatically made a member of the Board of Directors.

The composition, powers, responsibilities, rights, working principles and procedures of the Board of Directors are established by the Bank's "Regulation on the Board of Directors."

The criteria that members of the Board of Directors must meet are set forth by the Banking Law, and Aktif Bank ensures full compliance with said legislation when electing members. The Articles of Association dictate that the Board Members be elected in accordance with the relevant provisions of the Turkish Commercial Code and relevant banking legislation, and that as per Article 23 of the Banking Law, one more than half of the Board Members must meet the criteria

for CEO as stipulated in the Law (as a minimum, bank CEOs must hold a bachelor's degree in either law, economics, finance, banking, business administration, public administration or related fields and have at least 10 years of professional experience in banking or business administration; those with a bachelor's degree in engineering must also hold a master's degree in one of these fields).

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GOVERNANCE

ETHICS

As part of its ethics approach, the Bank has adopted the “Principles of Banking Ethics” published by the Banks Association of Türkiye. Please visit <https://www.aktifbank.com.tr/hakkimizda/kurumsalyonetim/etikilkeler> to learn more about the Principles of Banking Ethics of the Banks Association of Türkiye.

ETHICS HOTLINE

Based on the Regulation on Internal Systems and Internal Capital Adequacy Assessment Process of Banks issued by the Banking Regulation and Supervision Agency as per the Banking Law No. 5411 and published in the Official Gazette of July 11, 2014, Aktif Bank has established an ethics hotline procedure and associated systems to prevent any damage to the Bank’s reputation, employees, customers and shareholders and to strengthen corporate governance.

To fulfill this obligation, the Audit Committee has established the necessary procedures and systems with this procedure to enable that all Aktif Bank personnel can report, either via mail or digital channels, any act or transaction, infractions or misconduct that represents a violation of applicable laws and regulations in effect, breach of accounting and bookkeeping regulations, procedures and principles in effect, or conflict with the internal audit environment

and the Bank’s procedures and guidelines.

In this context, all Aktif Bank personnel are entitled to directly report any of the above to the Audit Committee and the Inspection Board to serve the Bank’s interests as an act of goodwill.

The Inspection Board is responsible for establishing a personnel reporting channel, monitoring its operation, ensuring the confidentiality of reports and reporters and following up on any action taken by the Bank’s executive units and senior management.

The Bank’s senior management is likewise responsible to protect the reporting employee from reprisals and to keep their identity confidential.

All Aktif Bank employees are responsible for reporting any violation or breach specified above, or any act of misconduct, infraction or non-compliance verbally via phone, or in writing via mail or electronic message.

All reports will be kept strictly confidential. It is the Inspection Board’s responsibility to maintain the confidentiality of reports.

Aktif Bank stakeholders may also report suspected breaches via the Call Center at 0850 724 30 50, iletisim@aktifbank.com.tr email address, and the “Ethics Hotline” section of aktifbank.com.tr. Reports will be escalated to the Aktif Bank Inspection Board, which will launch an investigation based on the nature of the breach.

In addition, the Inspection Board has set up whistleblowing lines accessible to all personnel to receive reports of ethics breaches by Aktif Bank personnel. Employees who wish to submit a report may do so by contacting the phone number and email address, which are accessible only by the Inspection Board.



THE RELATIONSHIP BETWEEN BANKS AND THEIR CUSTOMERS, EMPLOYEES, AND OTHER ORGANIZATIONS SHOULD BE GOVERNED BY THE PRINCIPLES OF ETHICS.



ANTI-BRIBERY AND CORRUPTION

The purpose of Aktif Yatırım Bankası A.Ş. Anti-Bribery and Corruption Policy (“Policy”) is to ensure compliance of Bank employees, Bank representatives and Bank contractors and business partners with applicable legal regulations against bribery and corruption, codes of ethics and professional conduct, and other international standards. Aktif Bank takes a zero-tolerance approach to bribery and corruption, and views this Anti-Bribery and Corruption Policy as an essential component of all Bank policies and rules.

PERSONAL DATA PROTECTION

Aktif Bank acts in full compliance with the legislation in processing, transferring and storing personal data to offer the most suitable services to its customers.

Aktif Yatırım is committed to take any technical and administrative measure necessary to ensure that your personal data is processed in accordance with the law, prevent unauthorized access, and store your data securely.

Customer satisfaction is one of the main goals of Aktif Bank, and as such, the Bank acts in line with the principles of transparency and accountability in all data processing procedures.

Aktif Bank takes a zero-tolerance approach to bribery and corruption.



GOVERNANCE

RISK MANAGEMENT

THE AUDIT BOARD IS THE HIGHEST BODY RESPONSIBLE FOR RISK MANAGEMENT AT AKTIF BANK. THE INSPECTION BOARD, INTERNAL CONTROL, REGULATORY COMPLIANCE AND RISK MANAGEMENT DEPARTMENTS ALL REPORT TO THE AUDIT BOARD.

DEPARTMENT	ACTIVITIES
Inspection Board	<ul style="list-style-type: none">• 5 branch audits,• 16 head office department and process audits,• 1 process audits across support service providers,• 6 information technologies audits,• 8 subsidiary/affiliate audits,• 15 investigations and reports.
Internal Control	<ul style="list-style-type: none">• Inspected 662 banking service control points and published four control reports.• Within the scope of Management Statement, 627 first-level controls on the Bank's information systems and banking processes were tested.
Regulations and Compliance	<ul style="list-style-type: none">• The Bank has been provided with advisory to ensure compliance of current and planned activities and new service, product, project, advertising, promotion and campaign launches with the Banking Law and other relevant legislation, internal policies and rules, and banking practices.• Within the scope of the prevention of laundering proceeds of crime and the financing of terrorism, the necessary Bank policies and procedures have been established and revised as necessary. To fulfill the requirements of the relevant legislation, customer transaction monitoring, correspondent bank check, suspicious activity identification and reporting has been carried out.
Risk Management	<ul style="list-style-type: none">• The Bank has continued to identify its risk exposure, assess these through stress tests and scenario analyses, and maintain such exposures within the limits determined by the Board of Directors. Exposure is reported to the Assets-Liabilities Committee and the Board of Directors on a regular basis.• Loan loss provision calculation model was reviewed and revised.

RISK

MANAGEMENT APPROACH

Credit Risk	<ul style="list-style-type: none">• For the credit analysis, allocation and disbursement processes, a dynamic credit portfolio management approach has been adopted, taking early warning signals into consideration. The policies, processes, responsibilities and limits for an effective credit risk management have been established and documented in writing.• The Bank has developed a borrower evaluation model that can be used to measure risk exposure for corporate customers. There is also a separate model for individual loans.• The Department monitors the creditworthiness of corporate and retail loan portfolios and the increases in risk and concentration levels to check compliance with the limits set by the Board of Directors. Results are reported to the Audit Committee and the Board of Directors.• Stress tests and scenario analyses are applied to the portfolios in order to measure the resilience of the Bank's capital against the risks, to which the Bank may be exposed due to credit risk.
Market and Liquidity Risks	<ul style="list-style-type: none">• Taking into consideration the Bank's risk capacity, the Board of Directors has determined the acceptable risk levels and set risk limits accordingly.• The Bank has identified financial emergency indicators and established rapid decision-making mechanisms to predict risks.• Liquidity risk, interest risk, exchange rate risk, and structural interest rate risk assessment, measurement and monitoring is carried out using nationally and internationally accepted risk models and parameters• Risks are monitored using various scenario analyses and stress tests and the results are shared with the senior management, Assets-Liabilities Committee, Audit Committee and the Board of Directors.
Operational Risk	<ul style="list-style-type: none">• Basel-compliant risk categories have been defined.• The Bank has conducted Business Impact Analyses and Risk Self-Evaluations and drawn up risk inventories in order to determine and quantify points of exposure in banking processes and products.• Within the framework of Business Continuity planning, necessary infrastructure was put in place to enable the Bank to continue its activities in case of disasters such as earthquake, fire or flood.

BUSINESS CONTINUITY

Aktif Bank employs a set of Business Continuity Procedures and Plans to ensure the uninterrupted operation of critical processes and resolve any disruptions within a predicted timeframe. The Bank renewed its ISO 22301:2012 certification in 2020. Business Continuity Plan is reviewed at least once a year in meetings convened by the Emergency Management Committee Chairman. The Bank's critical business and IT functions undergo ODM testing every year in line with specific emergency scenarios to test the organization's preparedness against a potential emergency situation.

TALENT AND DEVELOPMENT

The Talent and Development policy aims ensure that Aktif Bank achieves its goals and strategies while boosting employee productivity and satisfaction. The Bank offers employees training programs and career path plans that target self-development. Employee performance evaluation and remuneration systems are structured to achieve these goals.

The Bank aims to create a workplace environment that promotes the

energy and creativity of employees and enables them to show their skills. Aktif Bank embraces the principle of ensuring employee motivation and loyalty through efficient and people-oriented human resources practices.

In light of this strategy, and with the understanding that the human resource is the most valuable asset of the Bank, the best local and global practices are monitored in order to enrich this asset and improve the Bank's talent and development

activities, while developing practices to promote creativity among and recognize value added created by Aktif Bank employees to foster a culture of high performance.

Aktif Bank aims to offer a working environment where employees can develop themselves without discrimination. The Bank provides equal career opportunities and has established incentive systems that promote success. In line with this understanding, Aktif Bank is able to attract highly competent and experienced employees as well as high-potential new graduates through the right recruitment tools.

Decisions and developments concerning employees are communicated through announcements and procedures. The Bank has implemented measures to prevent discrimination of employees based on their race, ethnicity, language, religion, and gender; to ensure that human rights are respected and its employees are protected against all kinds of physical, mental and emotional abuse within the company. In 2021, employees were provided six hours of human rights training.

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The Bank aims to create a workplace environment that promotes the energy and creativity of employees and enables them to demonstrate their skills.
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EMPLOYEE PROFILE

Number of Employees by Region	2018	2019	2020	2021
Head Office	659	706	749	774
Subcontractor	143	170	189	348

Workforce Turnover Rate	2018	2019	2020	2021
Head Office	%26	%20	%13	%21

New Hires	2018	2019	2020	2021
White Collar	171	174	130	206
Male	95	103	71	117
Female	76	71	59	89

By Age	2018	2019	2020	2021
<30	81	88	58	94
30-50	90	86	71	110
>50	0	0	1	2

EMPLOYEE ENGAGEMENT

Fully aware that the human resource is its most valuable asset, Aktif Bank conducts surveys and interviews to continuously monitor and improve employee development, satisfaction, and loyalty.

Bolstering employee engagement is a key area of focus for the Bank, as it plays a crucial role in delivering better business results through improved employee satisfaction. The Bank embraces the ‘Engagement Model’ that recognizes company practices, key concepts, and job descriptions as fundamental qualities, while emphasizing

leadership, performance, and brand aspects as distinguishing qualities.

Aktif Bank conducts employee engagement surveys every two years to assess its standing and identify areas of development, using industry benchmarks as a reference.

The most recent Employee Engagement Survey was conducted in 2021.

The results of the 2021 survey have been analyzed and compared to industry benchmarks in order to guide the creation of improvement roadmaps.

The Engagement Model recognizes company practices, key concepts, and job descriptions as fundamental qualities, while emphasizing leadership, performance, and brand aspects as distinguishing qualities.

ENGAGEMENT MODEL



Core Concepts

- Work / Life Balance

Work

- Delegation / Autonomy
- Work Activities

Agility

- Collaboration
- Customer Focus
- Decision Making
- Diversity and Inclusion
- Infrastructure

Engaging Leadership

- Senior Management
- Immediate Superior

Talent Focus

- Brand
- Career & Development
- Performance Management
- Reward & Recognition
- Talent and Payroll

ENGAGEMENT OUTPUTS



Say



Stay



Strive

WORK OUTPUTS

• HR Indicators

- Absence
- Retention
- Employee Health



• Operational Indicators

- Efficiency
- Occupational safety



• Customers

- Satisfaction
- Net Recommendation Score



• Financials

- Revenue / Sales Growth
- Revenue / Margin
- Total Shareholder Return



AKTİF BANK'S RESULTS FROM THE SURVEY CORRESPOND TO MEDIUM ENGAGEMENT THE RESULTS WERE USED TO DETERMINE WHAT TO MAINTAIN AND WHAT TO IMPROVE.

AKTİF BANK'S SUBSIDIARIES	%59
Aon Bankacılık - 2021 **	%62
White Collar (WC) Türkiye - 2021	%61
Great Place to Work Türkiye - 2021	%75

For Sustainable Business Results

- HIGH ENGAGEMENT %60
- SENIOR MANAGEMENT 65
- PERFORMANCE CULTURE %54
- EMPLOYER BRAND 68%

Main Focus Areas

- AREAS OF STRENGTH
 - Colleagues
 - Work Awareness
 - Suitability of Skills / Experience for the Work
 - Respect for Diversity
 - Teamwork
- AREAS OF IMPROVEMENT
 - Career opportunities
 - Infrastructure opportunities
 - Reward & Recognition
 - Talent and Staffing
 - Performance Management

RECRUITMENT

Appropriate candidates are scouted for open positions at Aktif Bank from internal or external talent resources. Candidates go through a stepwise evaluation process that includes tests, Talent and Development, and department-specific interviews to test their talents and skills.

Our Recruitment Policy

As part of recruitment, Aktif Bank mainly aims to employ people who are;

Open to learning, change and self-development,

- Well-educated,
- Innovative and creative,
- Able to represent the organization with high-level communication skills,
- Collaborative, and
- Aware of business ethics and their social and environmental responsibilities, to form a dynamic staff with that can provide the fastest and highest quality services to the Bank's internal and external customers.

Recruiting Inexperienced Employees

Candidates who are fresh university graduates or have no experience in banking are evaluated based on the needs of Aktif Bank Branch or Head Office departments. Firstly, candidates for these departments have to take general aptitude and foreign language tests.

YEAR	NEW HIRES
2021	206
2020	130
2019	169
2018	171

Candidates are then interviewed and placed in appropriate departments in line with the Bank's needs and their qualifications.

Recruiting Experienced Employees

Experienced employees are recruited based on Aktif Bank's needs and after meetings with professionals who are experts in their fields.

OCCUPATIONAL HEALTH AND SAFETY

Aktif Bank has an Occupational Health and Safety Committee. Committee members:

- Employer or employer's representative,
- Occupational safety expert,
- Workplace physician,
- One person in charge of human resources, personnel, social affairs or administrative and fiscal affairs,
- Civil defense expert, if available,
- Foreman, master, or craftsman, if available,
- The employee representative is the lead representative in case there is more than one employee representative in the workplace.

The committee meets every three months.

The process of identifying hazards and risks is carried out in compliance with the Law No. 6331 on Occupational Health and Safety and the relevant Occupational Health and Safety Risk Assessment Regulation.

A periodical physical examination is required every five years at Aktif Bank, which is categorized as a low hazard workplace. These examinations were performed by the workplace physician in 2019.

Aktif Bank has the necessary tools and equipment to ensure that occupational health and safety personnel can work effectively.

The Bank closely monitors the effectiveness of cooperation and coordination among those responsible for occupational health and safety services within the organization. The workplace physician, occupational safety expert and other health personnel are provided with the necessary conditions to fulfill their duties.

The occupational safety expert, workplace physician and all departments at Aktif Bank have clear job descriptions. Our Talent and Development, Construction Real Estate and Support Services teams are responsible for OHS activities. In addition, our employees on the OHS committee share this responsibility.

Eye disorders due to long screen time, wrist and joint disorders due to mouse and keyboard use, and hearing disorders of the call center employees may be cited as the risk factors concerning employees. In order to minimize these risks, protective equipment is provided when necessary. To this end, all employees had an eye examination in 2019.

COVID-19

Believing that its employees are its most valuable asset, Aktif Bank furthers its efforts to provide them with a healthy and safe working environment.

With many measures taken during the COVID-19 outbreak in 2021, the Bank continued to care for and value employee health. These measures are listed as follows:

At the start of the pandemic, the Bank distributed hand sanitizers to employees.

- Masks, which were first distributed on a daily basis, are now distributed as monthly packages at the beginning of each month.
- Complimentary masks were also distributed for employees' children in November.
- Hand sanitizer dispensers have been installed and COVID-19 warnings have been posted at the entrances and in all common areas of the additional service buildings of the Head Office and branches.
- Retractable belt barriers for social distancing have been placed in necessary areas.
- On all the floors, the doors opening to the stairs have been fixed to remain

open, and the office entrance doors have been equipped with sensors.

- A HVAC system to provide fresh air circulation in the working areas was commissioned and the office air quality was constantly monitored.

- Thermal cameras were placed at the entrance, and thermometers were installed in branches and additional service buildings.

- The number of people allowed in an elevator car has been limited to three.

- All offices are sanitized by teams of professionals every two weeks at 5:00 on Mondays. The implementation frequency of this hygiene measure, which is recommended to be monthly, is every two weeks at Aktif Bank. Moreover, if someone working on any floor tested positive for COVID-19, that floor, the elevator and entrances were immediately sanitized with a disinfection device. The infirmary has also been disinfected with this device every night.

- The cleaning staff sanitizes the door handles, sinks and common areas on all floors during the day.

- Our workplace physician continued to work in our Head Office building during the pandemic.

- Informative images of COVID-19 measures were displayed on the

computer login screens of all our employees.

- Separate bins have been placed on the floors for disposing masks.

- The capacity of the gymnasium has been limited, with one training equipment to be available for use and the ones next to it to be unavailable. Warning signs have been prepared for the gymnasium. A dedicated cleaning staff has been assigned. All training equipment is sanitized immediately after each use. For contact tracing in the event that anyone entering the facility tests positive for COVID-19, everyone is required to check in. Employees are allowed inside after temperature checks.

- Signs indicating the seating plan are placed on all tables on the cafe floor. In order to prevent contact with the products, warning signs and disposable gloves have been placed in the relevant areas.

- In order for the tables to be sanitized in a hygienic manner by the night shift

Work accidents

YEAR	PERSONNEL WHO SUFFERED A WORK ACCIDENT	LOST WORK DAYS DUE TO WORK ACCIDENTS
2021	0	0
2020	3	5
2019	2	11

team, the “clean table” practice was announced in advance.

- With the start of the pandemic, the Bank switched its working model to working from home (WFH).

- Training on the Modes of Transmission of COVID-19 and Preventive Measures and Remote Working/WFH Training were assigned to all employees via the online training platform.

- During the WFH period, the systems of all the Bank employees continued to run smoothly, and the Information Technologies Group actively supported them.

- During the WFH period, the Talent and Development organized online activities and social activities for children. Individual and group training sessions and seminars continued online.

- Customers were allowed inside after HES code checks in our branches in the provinces where it was mandatory. HES code posters were prepared and placed in front of the branches.

EMPLOYEE DEVELOPMENT

The training system, designed in accordance with the goals and strategies and with Aktif Bank’s talent and development policies, aims to support the career and personal development of employees, and to drive motivation and ensure job satisfaction.

In line with these policies, improving the professional knowledge, skills and personal competencies of its employees is one of Aktif Bank’s top priorities. Driven by the understanding that the continuity of training is a key means of achieving the best results, Aktif Bank considers it among its main responsibilities to create development opportunities that will improve the knowledge, skills and business results of their employees and to ensure that the training and development programs are delivered to them in the most effective and efficient way possible both today and in the future.

Newly recruited employees undergo an orientation program on the first day of their employment. Moreover, their professional and personal development is supported by their participation in training programs to ensure technical

knowledge, professional and personal skill development in line with their career paths.

Aktif Bank launched a talent management program as of the end of 2019. The employees were provided with a universally applicable inventory for measuring behavioral indicators, designed for professional use. This inventory helped to identify the strengths and areas of development of the employees according to the behavioral indicators within Aktif Bank’s competency set. At the end of 2019, an inventory was sent to 850 employees who had worked for Aktif Bank and its Subsidiaries for at least one appraisal cycle.

Separate briefings were held for the managers and employees before the inventories were delivered. In total, 605 employees completed the inventory. The resulting talent matrix, which was the main output of this inventory, guides the talent management development program design process to include both talents and the entire organization.

With the implementation of the “New Career Paths” project, a new title structure and career levels have been introduced for the Information

Technology group and branch employees.

Within this scope, the Bank has designed assessment center practices, training, and development programs to bolster the career paths of these teams and provide valuable input for their career advancement. This process enables the evaluation of employees based on specific competencies, which are further supported through various programs and coaching, resulting in significant career advancements, including promotions.

PERFORMANCE AND CAREER MANAGEMENT

Promotion processes at Aktif Bank serve as an important assessment tool for career development. Each year, two Assistant Specialists and one employee from all other levels are promoted. Employees are evaluated for their career development on an annual basis.

Organization-wide performance appraisals happen once a year. In addition to this appraisal process, the performance of sales teams in sales functions is evaluated on a monthly/quarterly basis.

DIVERSITY, EQUAL OPPORTUNITY, AND WORK-LIFE BALANCE

Aktif Bank strongly believes in diversity and the importance of equal opportunity in business. According to the Employee Engagement survey conducted every two years, the Diversity and Inclusion score was 72% in 2021, making Aktif Bank one of Türkiye’s best employers.

AktifBank’sdiversityapproachapplies to both the senior management team and the employees.

- There are no minimum wage employees in Aktif Bank’s payroll.
- The salaries of employees working at the same level are fairly consistent across the organization, with no gender bias present.

In the context of human rights, Aktif Bank places a great deal of emphasis on diversity and work-life balance. The Employee Engagement survey also offers a statistical account of areas such as diversity and work-life balance. According to the Employee Engagement survey, the work-life balance score for 2021 was 68%, exceeding the average for the Turkish banking sector.

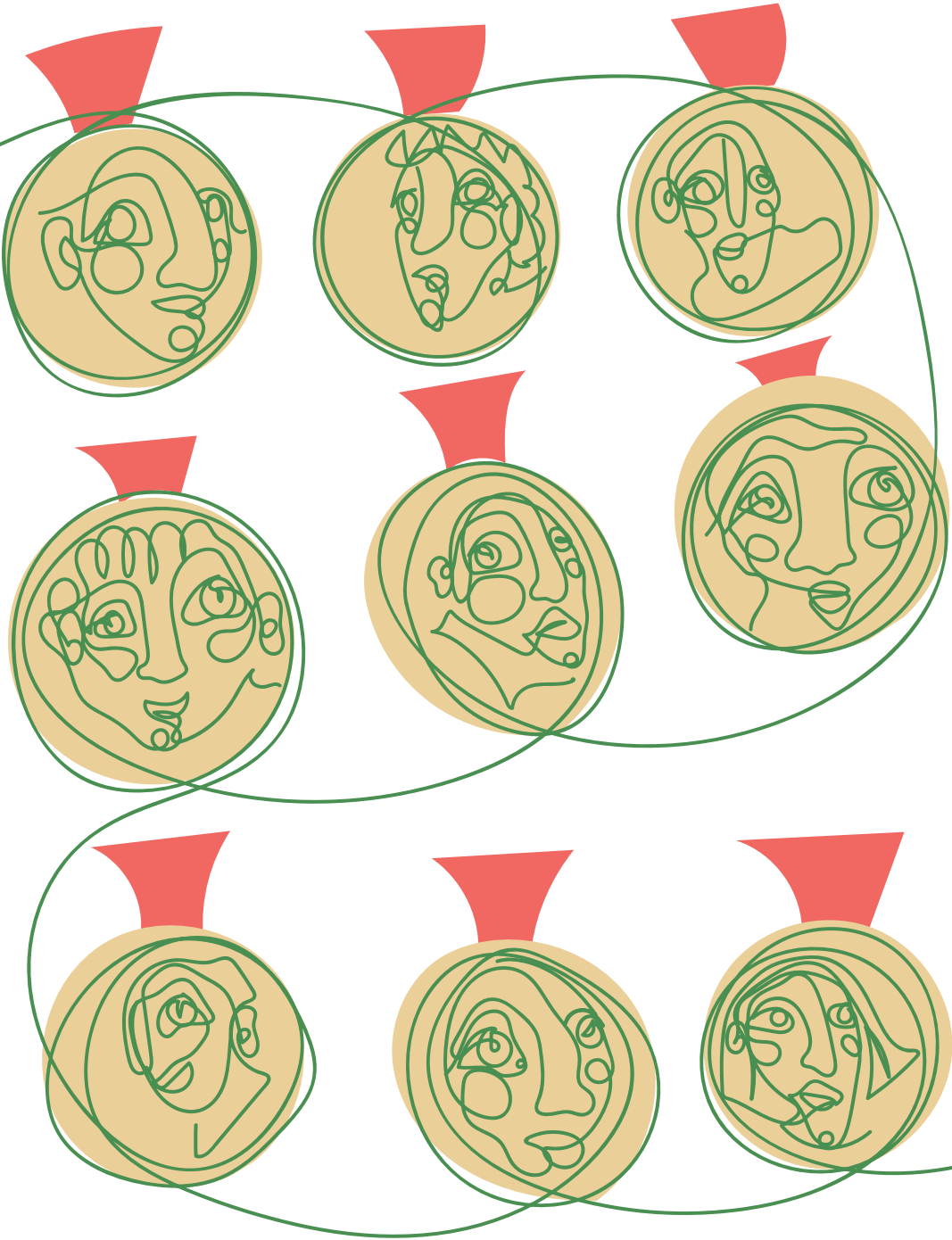
Another program launched in 2021 is the “Your Family is Our Family Leave.” According to this program, each employee is granted an additional three-day leave. Employees can use this leave on their birthdays or special occasions of their families.

In 2021, Human Rights training was one of the agenda items of Aktif Bank.

In the initial stage, this training was provided to the sales and marketing teams at the Corporate Branches,

who served as point of contact for the purchasing team and customers. The training’s primary objective is to raise awareness within the purchasing operation regarding the conscious selection of suppliers and within the corporate banking operation concerning the selection of customers, with a particular emphasis on the criterion of respecting human rights. The scope of the Human Rights trainings will expand to include various other teams.

YEAR	TRAINING HOURS PER EMPLOYEE
2021	23
2020	22
2019	37
2018	54



Training of Security Personnel

Outsourced and permanent security personnel are required to have received Human Rights training and answered the relevant exam questions correctly in order to obtain a security guard ID.

Moreover, complementary trainings on Human Rights, which outsourced security personnel can benefit from, are also available on online training platforms of the relevant companies. (Respectful behavior, interactions with elderly and children, conditions for using force, etc.) These topics are also addressed in renewal trainings.

Human rights training is also organized for our permanent security personnel.

Maternity Leave

Women employed at Aktif Bank are given maternity leave for a total of 16 weeks, eight (8) weeks before giving birth and eight (8) weeks after giving birth. In case of multiple pregnancy, two (2) weeks are added to the eight (8) week maternity leave before giving birth. Employees, who can certify that their health status is suitable for work up to three weeks before giving birth with a report from official health

institutions, can work until the 37th week of their pregnancy if they wish.

In this case, the work days before giving birth are added to the duration of the maternity leave after giving birth.

Maternity leave is a fully paid leave.

After the employee's maternity leave, she has the right to unpaid leave of

up to six months, as stipulated in the Labor Law.

After maternity leave, female employees are allowed to return to work in accordance with the legislation.

Aktif Bank covers maternity expenses and provides various benefits through the health insurance offered to its employees.

EQUALITY AND EQUAL OPPORTUNITY				
	2018	2019	2020	2021
a. Board of Directors				
i. Gender				
Male	6	6	6	7
Female	0	0	1	1
ii. Age				
<30	0	0	0	0
30-50	2	1	1	2
50+	4	5	6	6

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ONLINE TRAINING PLATFORMS ALSO OFFER COMPLEMENTARY TRAINING ON RESPECTFUL BEHAVIOR, INTERACTIONS WITH ELDERLY AND CHILDREN, AND CONDITIONS FOR USING FORCE.

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	Retail Banking				Commercial Banking				Investment Banking			
	2018	2019	2020	2021	2018	2019	2020	2021	2018	2019	2020	2021
Senior Management												
i. Gender												
Male	1	0	0	0	1	1	1	1	1	1	1	1
Female	1	1	1	1	0	0	0	0	0	0	0	0
ii. Age												
<30	0	0	0	0	0	0	0	0	0	0	0	0
30-50	2	1	1	1	1	0	0	1	0	0	0	0
50+	0	0	0	0	0	1	1	0	1	1	1	1
Mid-Level Management												
i. Gender												
Male	3	3	3	6	2	3	3	4	2	2	2	5
Female	1	3	2	5	3	2	2	2	4	6	5	3
ii. Age												
<30	0	0	0	0	0	0	0	0	0	0	0	0
30-50	4	6	5	11	5	5	4	5	5	7	7	8
50+	0	0	0	0	0	0	1	1	1	1	0	0
Non-Managerial White Collar												
i. Gender												
Male	47	51	55	56	9	15	19	23	10	10	9	10
Female	11	12	12	28	3	3	3	6	26	33	45	50
ii. Age												
<30	17	17	14	14	1	2	2	4	3	6	9	6
30-50	40	46	53	70	11	16	20	25	33	36	44	53
50+	1	0	0	0	0	0	0	0	0	1	1	1

Aktif Bank has field sales and branch operations outside of Istanbul. Local employees - residing in the respective cities - are assigned to these teams. No employee is appointed from Istanbul to work at other provincial branches. The entire branch staff, including Branch Managers and other managers, are employed from the local community.

REMUNERATION

The criteria for the remuneration policy of Aktif Bank are as follows:

- The value the job provides to the bank,
- Managerial responsibility,
- Professional knowledge/skills,
- The scope of the job,
- The complexity of work-related problems,
- The market value of the tasks involved.

NEW WORKING MODELS

As of July 2021, Aktif Bank has transitioned to the new working

model called “No Boundaries at the Office.” The scope of model goes beyond remote work.

Instead, it offers employees the flexibility to choose from various work arrangements supported by Aktif Bank’s robust infrastructure and technological capabilities.

The hybrid work model has been adopted by a significant percentage of Bank employees. It consists of alternating weeks, with employees working in the office for 3 days one week and 2 days the following week, while the remaining days are remote workdays.

Additionally, employees in the hybrid work model can work from outside the city, meaning they can conduct their remote work from a second location.

On the other hand, with the “My Flexible Month” program, employees can work from a different city for one month a year, and they can do

this twice a year in non-consecutive months.

With the “My Flexible Desk” program, employees have the convenience of working at shared desks designated for their departments when they visit the office, creating a more flexible working environment.

With the “Flexible Working Hours” program, employees are able work on fixed days of the week, daily, if it aligns with their tasks and is approved by their managers. This flexibility enables those who opt for it to transition to a part-time work model.

Another key program is the “Career Break.” This program allows employees to take a six-month unpaid leave to pursue personal development and aspirations, after which they have the option to return to their previous roles.

SOCIAL DEVELOPMENT

AKTİF BANK VOLUNTEERS

Aktif Hearts is a dedicated group of volunteers from Aktif Bank. Their mission is to ensure successful education by addressing the shortcomings of schools in Anatolia with limited resources. To date, Aktif Hearts has successfully renovated and improved 6 schools, elevating them to the necessary standards for quality education.

WE SUPPORT CULTURAL DEVELOPMENTS

Aktif Bank has signed a sponsorship deal with the Istanbul Foundation for Culture and Arts (İKSİV) for a period of four years. For years, İKSİV has been organizing various festivals, bringing famous artists and bands from around the world to Türkiye.

Attracting art enthusiasts from far and near, these events contribute to the cultural development of the society.

Aktif Bank aims to support projects that stand out in the field of arts in the coming years as well.

N KOLAY ISTANBUL MARATHON

In 2020, Aktif Bank became the naming sponsor of the Istanbul Marathon with its N Kolay brand. The dynamism and the lean and egalitarian service model of N Kolay complemented the spirit of Istanbul Marathon, one of the leading sporting events of its kind around the globe, to

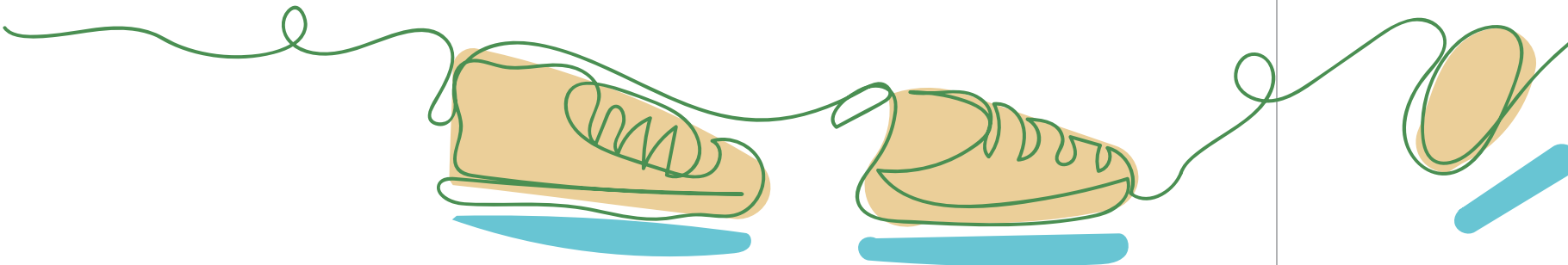
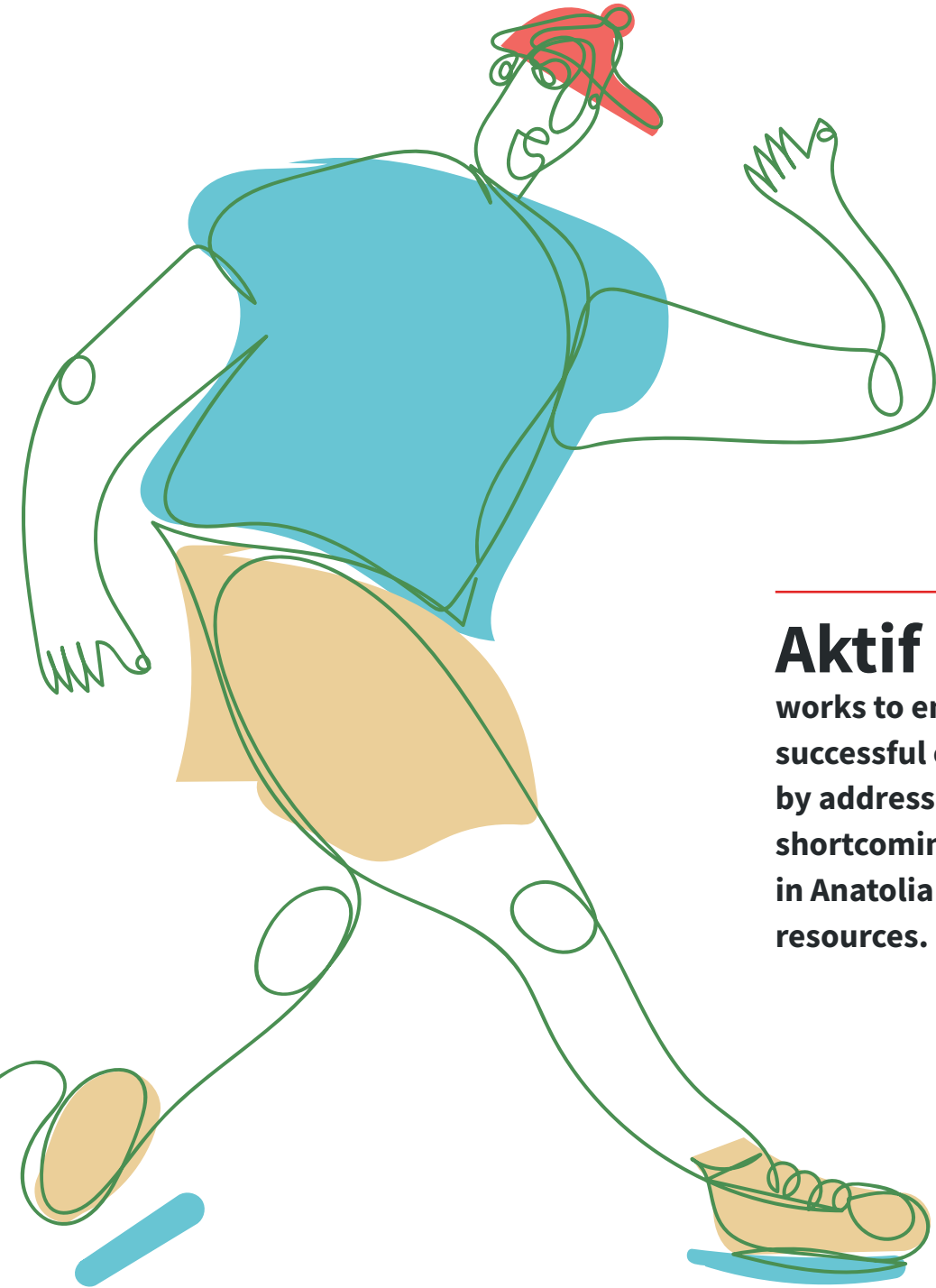
create a harmonious collaboration. Promoting sports at all levels, Aktif Bank, which has expanded its long-standing support to sports to also include running with the N Kolay Istanbul Marathon, has made yet another addition to its contribution to sports.

WE HELP ELIMINATE OBSTACLES

In cooperation with Parılı Association, Aktif Bank supports efforts to ensure the participation of the visually impaired in social life. It is important to facilitate the social engagement of these individuals by eliminating obstacles.

Aktif Hearts

works to ensure successful education by addressing the shortcomings of schools in Anatolia with limited resources.



**ETHICAL AND EFFECTIVE
MARKETING COMMUNICATION**

Aktif Bank designs its business model with a particular focus on efficiency and profitability, in line with its sustainable growth strategy. Accordingly, the Bank leverages its business partnerships to offer its products and services at a more affordable cost than the sector. This approach enables the Bank to have an efficient distribution network.

Aktif Bank has designed its banking strategy around digital channels as part of its fully digital business model. The Bank provides services to its individual customers through entirely digital products and processes via N Kolay Digital Bank.

With end-to-end digital and efficient processes, Aktif Bank's strategy centers on customer satisfaction, from acquisition to product usage, campaigns, and other financial solutions.

N Kolay is designed based on customer needs and feedback, providing over 75 services to cater to their requirements.

As part of its goal to transform N Kolay into Türkiye's most inclusive, most attractive, and most popular digital

bank, Aktif Bank is redesigning the app from the ground up, adding new functionalities and features to create a digital bank that will enable the customers to meet all of their financial needs through a simple, seamless, and intuitive user experience.

As digital transformation gains momentum, both regulations and user behaviors are evolving. And Aktif Bank is renewing N Kolay Digital Bank in line with user insights, digital trends, and customer needs.

N Kolay establishes closer and personalized connections with customers through micro-segmentation, implements targeted communication efforts, and develops special campaigns and solutions tailored for each micro-segment in order to expand the platform's user base, user conversion rate, and user activity.

New improvements to the platform have accelerated customer segmentation, profitability analyses, and efficiency-oriented product training activities. The Bank has also started to effectively leverage the results of data analysis and mining in customer communication.

Machine learning technologies have been integrated into business

processes, and the team has been expanded with the addition of new teammates to the already young and dynamic staff. In doing so, Aktif Bank has improved its product range and further bolstered its communications by better understanding its customers and their needs.

The Communication Center has delivered an above industry performance (benchmarked against the industrial performance indicators) in their service to the customers of the Bank and its subsidiaries with a particular focus on customer satisfaction. The service quality approach that generates value for and delivers solutions and offers alternatives to customers with whom the bank interacts 12 million times a year has yielded a "very good" rating in satisfaction surveys.

Aktif Bank conducts its promotional and marketing activities, which are closely regulated in the banking industry, in full compliance with legislation and with utmost respect for its customers. In this regard, all the employees of the Bank are well-aware of their responsibilities and ensure that, with the "customer satisfaction first" approach, the Bank's operations fully comply with the laws.

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**DESIGNED BASED ON
CUSTOMER NEEDS AND
FEEDBACK, N KOLAY
PROVIDES OVER 75
FUNCTIONS AND SERVICES.**

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Attaching a great deal of importance to the confidentiality of customer information, Aktif Bank has adopted high ethical standards in all its communication activities for product promotion, sales and marketing, including advertisements, brands, subsidiaries and sponsorships. By adopting an open disclosure policy in its product and service promotion activities, the Bank carries out all customer relations management processes by adhering to a transparent disclosure policy to ensure that customers do not lose their rights.

FINANCIAL INCLUSION

Aktif Bank also evaluates the loan requests of customers who have recently entered the financial markets and who have “weak credibility and no credit history”. The Bank evaluates such requests on a per-product basis by using various evaluation criteria and models.

Aktif Bank places significant emphasis on increasing tech investments within the finance industry and harnessing the power of data to foster financial inclusion. With the support of these technological and analytical endeavors, accurately and

promptly addressing our customers’ needs forms an integral part of Aktif Bank’s sustainability approach.

The N Kolay platform offers customers the opportunity to carry out their transactions through digital channels free of charge.

Scope of Corporate Credit Assessment

Aktif Bank strictly refrains from opening accounts for or conducting transactions with companies associated with narcotics as well as companies involved in the manufacturing and trade of explosives, weapons, and similar items.

Aktif Bank also avoids any collaboration with companies engaged in production and activities involving forced labor or harmful or exploitative forms of child labor.

Aktif Bank does not allocate any credit limits for activities related to the cross-border transport of waste materials, which are prohibited according to international law, as well as for speculative sectors and transactions.

Aktif Bank does not allocate any credit limits for games of chance, gambling, weapons and ammunition, chemical

weapons (excluding defense industry projects), smuggling, as well as non-environmentally friendly organizations and sectors.

In addition to these, current news about and judicial records of the companies applying for loans and their partners are taken into consideration during the loan evaluation process.

Aktif Bank refrains from providing loans to any company facing legal cases related to bribery, corruption, violation of human rights, or terrorism financing, or entities with substantiated negative media coverage. Aktif Bank strategically supports renewable energy investments. The Bank supports Solar Energy, Wind Energy and Biomass Energy projects that exhibit low carbon emissions in comparison to fossil fuels, self-renew, and have a significantly lesser impact on the environment. As of 24.12.2020, Aktif Bank considers the level of corporate governance of companies as a positive quality during the cash loan analysis stage. In Aktif Bank’s rating system, organizations with a robust corporate governance structure and transparent financial data tend to

receive higher ratings. Aktif Bank also provides financial support to research and development organizations that have been deemed eligible to receive incentives from TUBITAK TEYDEB (Directorate of Technology and Innovation Grant Programs).

CUSTOMER SATISFACTION POLICY

Motivated by its vision “to provide easy access to financial services that meet the needs of all segments of society through innovative and beneficial solutions, and to become the widest reaching financial services organization in Türkiye and the region,” Aktif Bank is committed to delivering the finest and highest quality service to its customers through all available channels. Aktif Bank recognizes that genuine success can only be attained through the satisfaction and engagement of both internal and external customers. The Bank strives to invest for employees who know what they do best, to continuously increase its efficiency by making effective use of available technologies, and to make customers happy with a solution-oriented professional approach. In line with the principle

of Customer Satisfaction, Aktif Bank diligently assesses customer requests and complaints in compliance with regulations (BRSA, TBB) and applicable laws, and upholding the principles of confidentiality, it ensures a fair and impartial evaluation process where complaints and suggestions are thoroughly reviewed, leading to ongoing enhancements in systems and processes to deliver lasting improvements.

COMPLAINT MANAGEMENT

Submitting Complaints

Complaints submitted by customers to Aktif Bank through the Bank’s communication channels are evaluated and concluded by the Complaints Management Department in accordance with legislation and regulatory processes.

Recording and Tracking Complaints

All requests and complaints submitted are linked to the sender’s TR ID number and recorded in the complaint management system. Recorded requests and complaints are evaluated as soon as possible. For applications and complaints that cannot be resolved as soon as

they are submitted, customers are informed that they will be concluded following a detailed analysis.

Evaluating Complaints

Requests or complaints that can be concluded at the time of submission are finalized upon providing the necessary information to the customers. Matters requiring investigation are meticulously evaluated and concluded by the relevant teams at Aktif Bank.

Concluding Complaints and Informing Customers

Requests that can be concluded at the time of submission are concluded after informing the submitter. Aktif Bank aims to conclude the requests and complaints as they are submitted. Requests or complaints are concluded following detailed analyses by the relevant teams at Aktif Bank.

Customers are informed about the concluded complaints.

Continuous Improvement

Aktif Bank improves its systems and processes by taking corrective, preventive and remedial action to prevent the recurrence of complaints.

SUPPLIERS

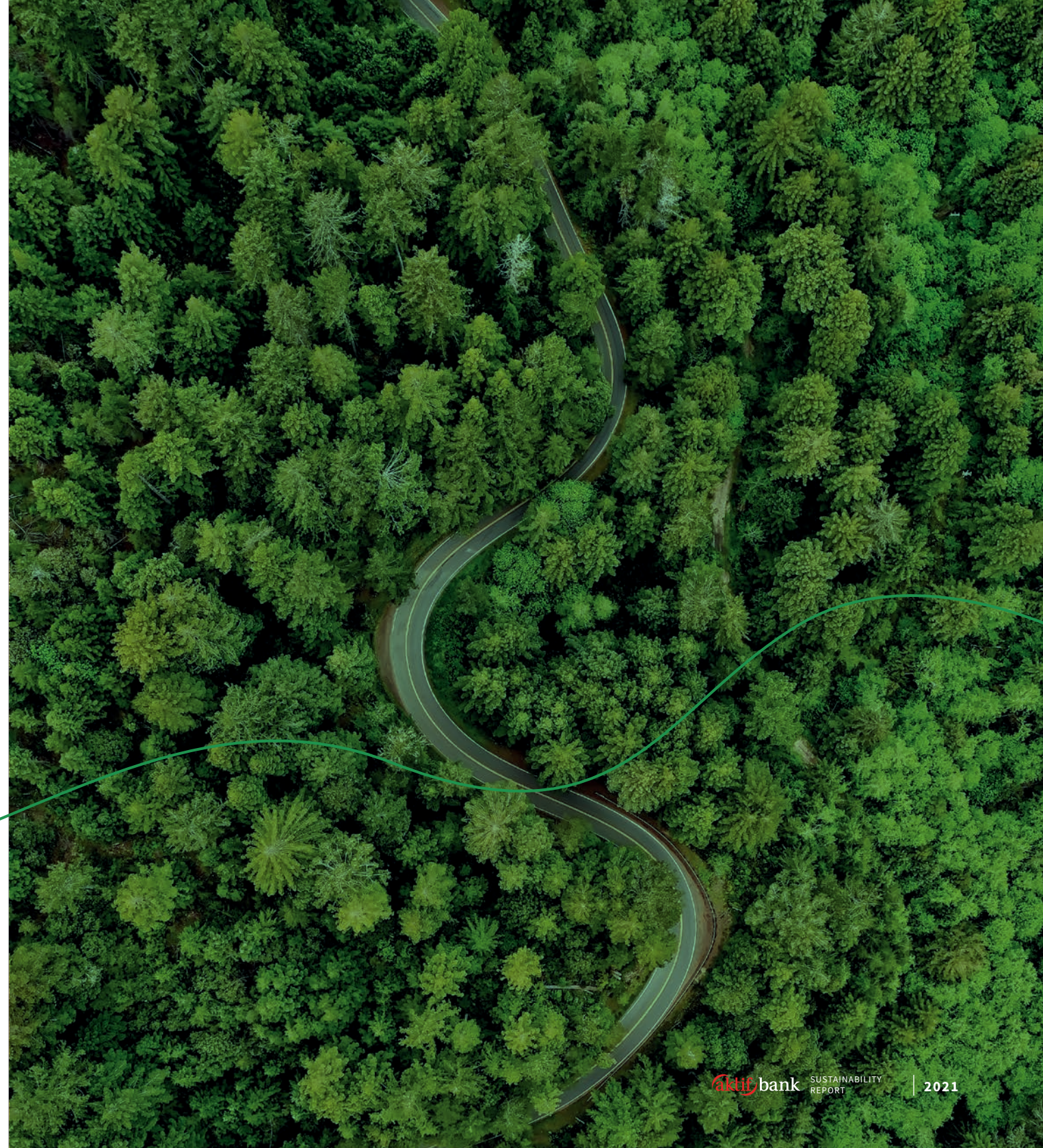
In addition to Aktif Bank's principles and policies, the suppliers are encouraged to comply with the UN Global Compact. Aktif Bank expects the suppliers it works with to act in line with its principles and values for the sustainability of its activities. The Bank champions the continuous development of its suppliers by exchanging information. Aktif Bank provides the companies in its supplier portfolio with information about Aktif Bank's Code of Ethics and Sustainability Policies.

The Bank expects commitment from all suppliers regarding compliance with code of ethics and sustainability policies. Aktif Bank takes measures for changes and disruptions that may occur in the Supply Chain, and devises alternative plans accordingly. Aktif Bank acts proactively to facilitate transitions without reducing the service quality and without interrupting its services.

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Aktif Bank expects the suppliers it works with to act in line with its principles and values for the sustainability of its activities.



ENVIRONMENT

WASTE MANAGEMENT
APPROACH

Aktif Bank Head Office is equipped with systems on each floor that allow for on-site sorting of waste. There are ongoing efforts to designate an area for waste collection inside the building with the goal of ultimately working with a waste management company for disposal once the necessary infrastructure is ready. When this system is launched, storage, weight (kg) and disposal information will be monitored on a waste type basis. The Bank plans to apply for a Zero Waste certificate once this system is fully operational.

All of the medical waste in the infirmary and the used masks and gloves disposed in the designated collection containers placed on the floors are sent to the municipality as medical waste.

Battery waste boxes are placed on the floors and when full, sent over to waste management companies. Batteries and old phones are sent to dedicated recycling companies.

For printers, a five-year contract was signed with Canon Eurasia as of March 2020. The company disposes of the toner/cartridge wastes of the printers.

Canon Eurasia collects old/empty toner cartridges and waste toner packages during the delivery of new ones.

Employees have no contact with the waste and chemical products kept inside the building or in the additional buildings.

As of January 2020, Aktif Bank has

moved to a New Head Office building equipped with smart building technology.

The lighting and mechanical automation system for energy saving is nearly 100% operational.

Electricity data comes in the form of a utility bill after monthly remote meter reading. KW/hour information is provided in the table below:

MONTH	CONSUMPTION	DEPARTMENT
January	-95.323,98	kWH
February	-96.885,44	kWH
March	-97.114,52	kWH
April	-83.467,66	kWH
May	-84.609,18	kWH
June	-95.066,82	kWH
July	-106.638,12	kWH
August	-125.868,42	kWH
September	-98.362,26	kWH
October	-85.341,96	kWH
November	-89.999,46	kWH
December	-101.069,82	kWH
Total	-1.159.747,64	kWH

Natural gas and water meters are monitored daily. Water Consumption in 2020: 5,315 m³, daily average 15 m³ / Natural Gas Consumption in 2021: 27,723 m³, daily average 77 m³.

Aktif Bank has also taken supportive measures for water saving in line with the smart building concept. In this context, flush tanks and sink faucets have been installed in accordance with the smart building concept (touchless sink faucets / water level- and pressure-adjustable flush tanks).

There are ongoing efforts to reduce the water flow rates and optimize them throughout the building, especially in the showers in the gymnasium.

State-of-the-art purification devices with water tanks have been deployed in the kitchen and common areas, thus reducing the cost of drinking water and eliminating the hygiene risks of using water cooler bottles.

With the implementation of these measures, Aktif Bank achieves a water consumption rate that is 10-15% lower than the average per capita urban workplace water consumption of 130 liters, as calculated by relevant organizations. The factory data of the products used also indicate statistical information to back this claim.

Aktif Bank achieves a water consumption rate that is

10-15%

lower than the average per capita urban workplace water consumption of 130 liters.

ENVIRONMENT

ENVIRONMENTAL AND SOCIAL RISK MANAGEMENT APPROACH IN LOAN PROCESSES

Aktif Bank performs environmental and social impact assessments and risk analyses for project and investment finance loans of more than TRY 100 million.

As per its policy, Aktif Bank does not provide funding to the below-listed projects and/or investments.

I. Projects related to products that are illegal to be produced as per International Treaties and the national legislation,

II. Projects related to manufacture of weapons, weapons of mass destruction and mines,

III. Projects involving human rights violations and child labor,

IV. Illegal manufacture and trade of asbestos,

V. Projects related to ozone-depleting products,

VI. Projects related to the manufacture and trade of Polychlorinated Biphenyls,

VII. Projects that harm rainforests and the ecosystem,

VIII. Production or trading of radioactive products,

IX. Gambling related projects.

When an organization applies for project or investment finance, the first step is to make general and sector-specific evaluations about the project in question, and request information about the project, investment location and plans from the applicant. After the analysis of the submitted information and the

assessment by the credit evaluation team, the projects are classified as low-, medium- or high-risk.

For low-risk projects, the risks and potential impact pertaining to matters that arise after the analysis are communicated to the borrowing company. The borrowing company is requested to devise an Environmental and Social Action Plan detailing how it will manage the risks in question and reduce and control the resulting impact. The action plan in question may be prepared by the applicant or by independent experts. Following the preparation of the action plan and its submission to Aktif Bank, the loan approval process will be initiated after the action plan is approved to be sufficient to manage risks. For medium- and high-risk projects, the risks and potential impact pertaining to matters that arise after the Bank's analysis are communicated to the borrowing company.

The borrowing company is requested to devise an Environmental and Social Action Plan detailing how it will manage the risks in question and reduce and control the resulting

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AFTER THE ANALYSIS OF THE SUBMITTED INFORMATION AND THE ASSESSMENT BY THE CREDIT EVALUATION TEAM, PROJECTS ARE ASSIGNED TO LOW-, MEDIUM- OR HIGH-RISK CATEGORIES.

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impact. The applicant is required to have independent experts prepare the said action plan. Following the preparation of the action plan and its submission to Aktif Bank, the loan approval process will be initiated after the action plan is approved to be sufficient to manage risks.

Monitoring the Project and the Customer's Obligations

As part of the loan approval process, the relevant departments at Aktif Bank attend on-site visits to see and evaluate the risks determined with the action plan and management activities. The goal is to ensure customer satisfaction. While evaluating the project risks, the following potential issues related to the project are evaluated.

- Biodiversity
- Impact on water resources
- Climate change and carbon emissions
- Air pollution
- Waste
- Public health and safety
- Worker health and safety
- Preservation of historical and cultural assets,

- Impact on endangered species
- Human rights
- If communities need to be resettled, how this process will be managed and how the resulting effects will be compensated,
- Obligations in agreements entered into with public and non-governmental organizations for the management of the project.

During the visit, the Bank performs due diligence and identifies the additional steps for the approval of the loan, if any. The matters covered in the action plan are also specified in the customer obligations section of the loan agreement. Thus, if these obligations are not fulfilled during the loan facility and repayment process, or if the detected cases of non-compliance are not corrected within the specified time frame, the loan is recalled or loan facility is withdrawn.

Projects are evaluated for various aspects while deciding on project finance and in the monitoring process. The initial evaluation is for analyzing the project and its impacts. As part of this evaluation, the measures

and their performance in managing risks and impacts are evaluated. The second evaluation is for analyzing the capabilities and approaches of the costumer carrying out the project. Accordingly, the organization's past approaches, current corporate values and policies, and the efficiency of its resource structure in performing the target actions are analyzed and evaluated.

Once the project loan is approved, the relevant departments perform regular audits and inspections during both the project implementation phase and the loan repayment process after the project is commissioned. In doing so, the Bank is able to proactively identify risks before they emerge and take precautions. This procedure enables Aktif Bank to manage potential risks that may arise during the repayment process.

Environmental Social Action Plan

The action plan is where the customer declares – with respect to managing the social and environmental risks of the project:

I. What kinds of activity [land procurement, working conditions, environmental impacts (biodiversity, climate change, water use, waste), social impacts, preservation of historical and cultural assets, the approach of the main project owner, if the project is carried out on behalf of another organization, etc.], arrangement and investment will be involved,

II. The project pipeline,

III. The financing method,

IV. Whether the customer will solely manage the processes or by working with independent consultants.

This action plan is prepared by the organization or by independent external consultants according to the risk group of the project.

The Bank carries out its evaluations and audits within the framework of this plan during the operational

process, during which investment and loan payments continue.

The Bank has the right to request improvements from the customer based on cases of non-compliance or changes in conditions. If the necessary conditions are not met, the loan facility may be withdrawn or the loan may be recalled.

The Bank is able to proactively identify risks before they emerge and take precautions.



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