



The Banks Association of Türkiye

2024 Sustainability Report





Sustainable Tomorrow

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About the Report

All questions, suggestions, and feedback regarding the report can be sent to the Banks Association of Türkiye at tbb@tbb.org.tr.

This report presents the economic, environmental, social, and governance performance of the Banks Association of Türkiye ("The BAT" or the "Association") for 2024. This report outlines the Association's sustainability approach, activities carried out throughout the year, performance indicators, and strategic priorities, and covers all operations in Türkiye for the period from January 1 to December 31, 2024.

The BAT continues to report on its sustainability performance on an annual basis in a regular and transparent manner. The 2024 report provides a comprehensive framework for the Association's sustainability policies, material topics, and

practices related to the management of environmental and social impacts.

The full report can be accessed at www.tbb.org.tr.

This report has been prepared in accordance with the Global Reporting Initiative (GRI) Standards. The content has been developed in line with the materiality assessment, stakeholder expectations, the Association's strategic orientation, and the double materiality approach.

Performance disclosures are presented in accordance with the relevant GRI indicators.

The 2024 Report also covers the practices implemented within the framework of the Association's sustainability approach, its alignment with the United Nations Sustainable Development Goals (SDGs), and the progress made throughout the year.

The report has been prepared with an environmentally conscious approach and published in electronic format. The data included in the report have been compiled based on internal records, environmental performance monitoring systems, stakeholder feedback, and information provided by relevant internal units.





Alpaslan ÇAKAR

Chair of the Board



Message from the Chair of the Board

At the BAT, we will continue to contribute to the sector's preparation for a green and resilient future through our data-driven, collaborative, and long-term value creation-oriented approach.

Dear Stakeholders,

The Banks Association of Türkiye has supported the development of the finance and banking sector since its establishment and has contributed to the advancement of the banking profession with a sustainable approach. By taking into account stakeholder expectations, it adopts an inclusive, stable, and reliable approach and addresses sustainability as a strategic priority while considering the social and environmental impacts of the banking sector. It contributes to the long-term value creation of the financial ecosystem by enhancing sectoral coordination and continues its efforts to ensure the effective management of resources, increase social benefit, and leave a livable world for future generations.

With this understanding, the Banks Association of Türkiye completed 2024 as a period in which sustainability became an integral part of its institutional culture, and the strategic steps taken

in the environmental, social, and governance areas delivered tangible outcomes. In 2024, by incorporating the principle of sustainability into our core values, we not only made a statement of principle but also strengthened our entire institutional structure and processes in line with this approach.

In a period when our sector is accelerating its sustainability-driven transformation, the sustainability materiality assessment conducted revealed that the BAT's most critical focus areas are data security, regulatory compliance, ethical business practices, and sustainable finance. Our wide-ranging work—from heat map methodologies and green asset ratio analyses to the harmonization of sustainability reporting standards and capacity-building programs—has become a reference point for the green transformation of the financial sector.

The Association's sustainability approach is not limited to providing sectoral guidance but has a holistic structure that also strengthens its own institutional performance. Our training activities for employees and the capacity built in this area are a clear reflection of the importance we place on development. The significant increase in our training investments demonstrates our determination to equip our human capital with the competencies of the future. The increase in the share of female employees to 51% and female managers to 46% stands as strong evidence of our human resources approach, which is grounded in inclusivity, equal opportunity, and diversity.

We use stakeholder feedback as a compass in shaping our roadmap. The 97% satisfaction rate achieved in the 2024 Stakeholder Satisfaction Survey stands as a strong indicator of our service quality and effectiveness in sectoral coordination. This result has further strengthened the Association's position as an

inclusive and reliable organization that adds value to the financial ecosystem.

At the same time, our efforts to reduce environmental impacts have focused on enhancing resource efficiency and transitioning operational processes toward a more sustainable structure. Our practices aimed at reducing plastic and paper use, improvements in energy efficiency, and the successful completion of ISO 14001 and ISO 14064 certification processes that strengthen our environmental management system are concrete indicators of our commitment in this area. By regularly monitoring our carbon footprint, we aim to make our environmental performance more transparent and accountable.

In a period when global trends are heightening awareness of climate risks and digital transformation, we recognize the critical role of the banking sector in sustainable development. At the BAT, we will continue to contribute to the sector's preparedness for a green and resilient future through our data-driven, collaborative, and long-term value creation-oriented approach. Our commitment to the effective management of resources, financial inclusion, the strengthening of ethical principles, and the fulfillment of our environmental responsibilities will continue accordingly.

I sincerely thank all our stakeholders, member banks, and valued colleagues who have contributed to this journey. We will continue to move forward with determination alongside all our stakeholders on this path, with the aim of leaving a stronger, more inclusive, and sustainable financial ecosystem for the future.

Sincerely,

Alpaslan ÇAKAR
Chair of the Board



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About BAT

BAT has positioned increasing the efficiency of the financial sector, enhancing international competitiveness, and contributing to sustainable growth among its core objectives.



The Banks Association of Türkiye (BAT) is a public professional organization established pursuant to Article 79 of the Banking Law and operates as a legal entity. Since 1958, the Association has been a leading umbrella organization supporting the development of the banking sector in Türkiye and contributing to the stability of the financial system.

The BAT plays an active role in areas including sectoral policy development, legislative development, the establishment of ethical principles, and the conduct of training and research activities, with the aim of contributing to the sustainable growth of the Turkish economy. The Association also stands out for its efforts to strengthen dialogue channels among stakeholders and its initiatives aimed at enhancing the international competitiveness of the financial system.

With a strong national and international engagement network, the BAT represents the Turkish financial sector on international platforms as a member of the International Institute of Finance (IIF), the European Banking Federation (EBF), the Council of Banking Associations of the Turkic States, the International Chamber of Commerce (ICC), the Economic Development Foundation (EDF), the Foreign Economic Relations Board (DEİK), the Istanbul Development Agency of the Republic of Türkiye, the TOBB Banking and Finance Council, the Turkish Quality Association (KalDer), and the Asian Bankers Association.

Since its establishment, the BAT has identified increasing the efficiency of the financial sector, enhancing international competitiveness, and contributing to sustainable growth as its core objectives.

The Banks Association of Türkiye carries out its activities within the framework of a Strategic Action Plan (SAP) covering three-year periods. This plan is shaped through the assessment of the views, needs, and expectations

of internal and external stakeholders, surveys, measurements, assessments, and analyses, as well as by monitoring developments in the Turkish and global economies and taking into account the priorities of the Board of Directors.

The SAP is a core management tool that defines the BAT's strategic direction, ensures the effective use of its resources, and supports sustainable value creation. It is prepared to cover three-year periods; however, strategies and performance indicators are updated annually in line with emerging needs.

The strategic priorities identified for the 2024–2026 are as follows

- Contributing to the maintenance of financial stability
- Strengthening the perception of the banking sector
- Enhancing communication between the BAT and the banking sector
- Enhancing and expanding the digitalization and diversity of the BAT's products and services
- Enhancing the satisfaction of employees and other stakeholders
- Conducting activities to protect information security
- Carrying out activities in the field of sustainability.

The targets established in line with these strategic priorities form the basis of the BAT's action plans and are monitored annually via performance indicators.

Detailed information on these strategic priorities can be found in the **2024–2025 Period Activities – Activity Report**.

Purpose

The aim is to support sustainable growth and social development by protecting the rights and interests of the banking sector, enhancing its competitiveness, preventing unfair competition, and contributing to the development of the banking profession.

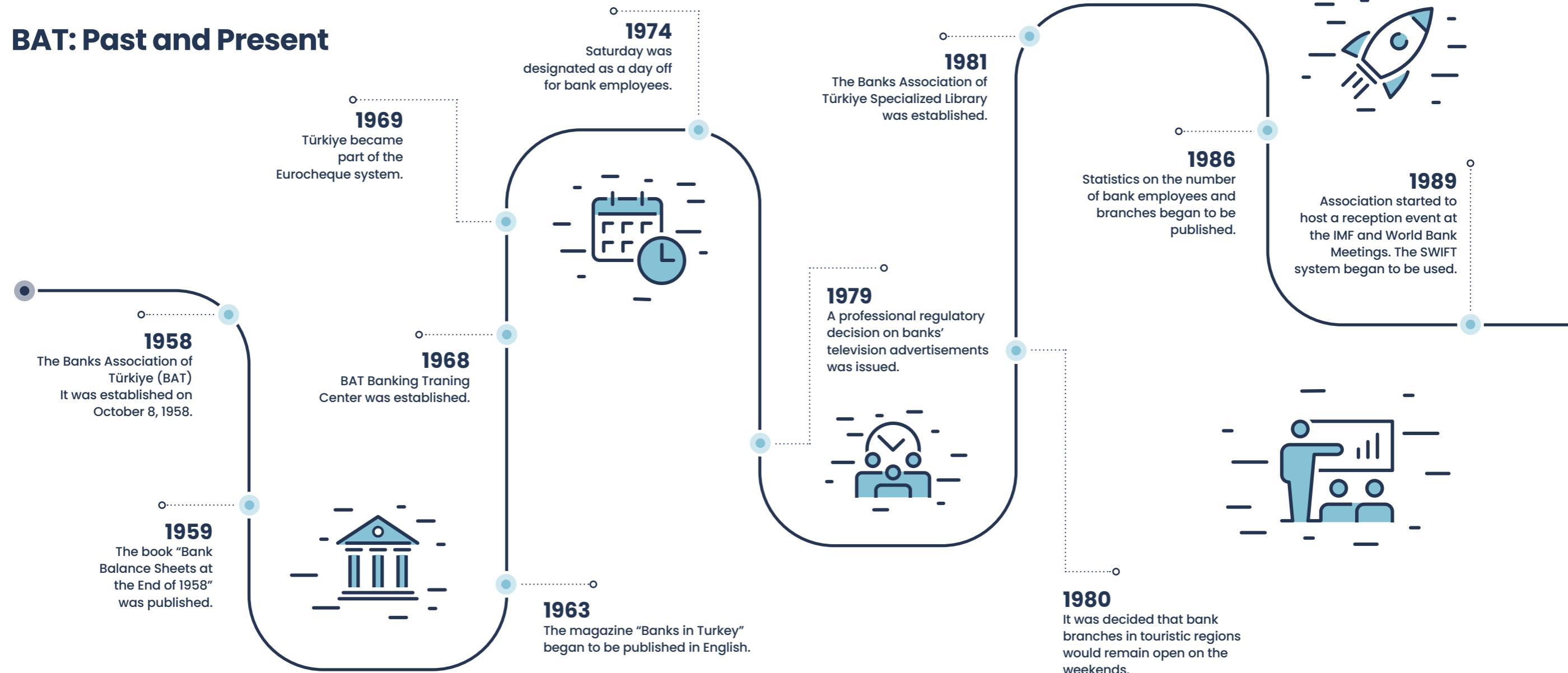
Vision

To carry out value-adding activities that contribute to maintaining a stable, secure, and inclusive financial ecosystem and strengthening the banking sector's support for the economy.

Core Values

- **Stakeholder Focus** It gathers the expectations of its stakeholders, regularly measures and evaluates their satisfaction, and uses these as inputs in its activities.
- **It establishes transparent, trust-based, and sustainable relationships** Grounded in mutual trust and shared understanding with its stakeholders.
- **Continuous Improvement and Innovation** It continuously reviews its products and services together with its stakeholders in terms of effectiveness and efficiency, and enhances them to increase added value by leveraging technological developments.
- **Recognition and Appreciation** It recognizes and appreciates the efforts, achievements, knowledge, and expertise of all stakeholders who contribute to the Association's success and reputation.
- **Solution Orientation and Participation** It generates solutions based on shared understanding that address the rational needs of stakeholders.
- **Sustainability** It attaches importance to environmental, social, and governance practices in its activities and across the banking sector.

BAT: Past and Present



BAT: Past and Present

1990

The magazine *Bankacilar* began to be published.

The Interbank Card Center (BKM) was established.

Information requirements and standards were established for credit card agreements.

1991

Banking competitions were held, and the Dragos Training Center was opened.

1992

A scholarship program for banking education was launched in the UK.

1995

The BAT's headquarters was relocated from Ankara to Istanbul.

Kredi Kayit Bürosu (KKB) was established.

1993

Membership in the European Banking Training Network was obtained, and training was provided to foreign bankers.

The provision stipulating that the President of the Central Bank of Türkiye would serve as the President of the Banks Association of Türkiye was abolished.

The Tashkent Banking Training Center was established with the support of the BAT.

Infrastructure works for the EFT system were initiated.

1996

Membership in the European Banking Federation was obtained, and working groups were established.

1997

The BAT's first website was launched at www.tbb.org.tr.



2000

Monitoring of international regulations and compliance briefings were initiated.

The Banking Ethical Principles were published.

1998

Quarterly bank and sector balance sheet reports began to be published on the website.

The Kozyatağı Cash Center was opened.

Planning for the "Transition to the Year 2000" was carried out.

1999

The Statistical Database was established.

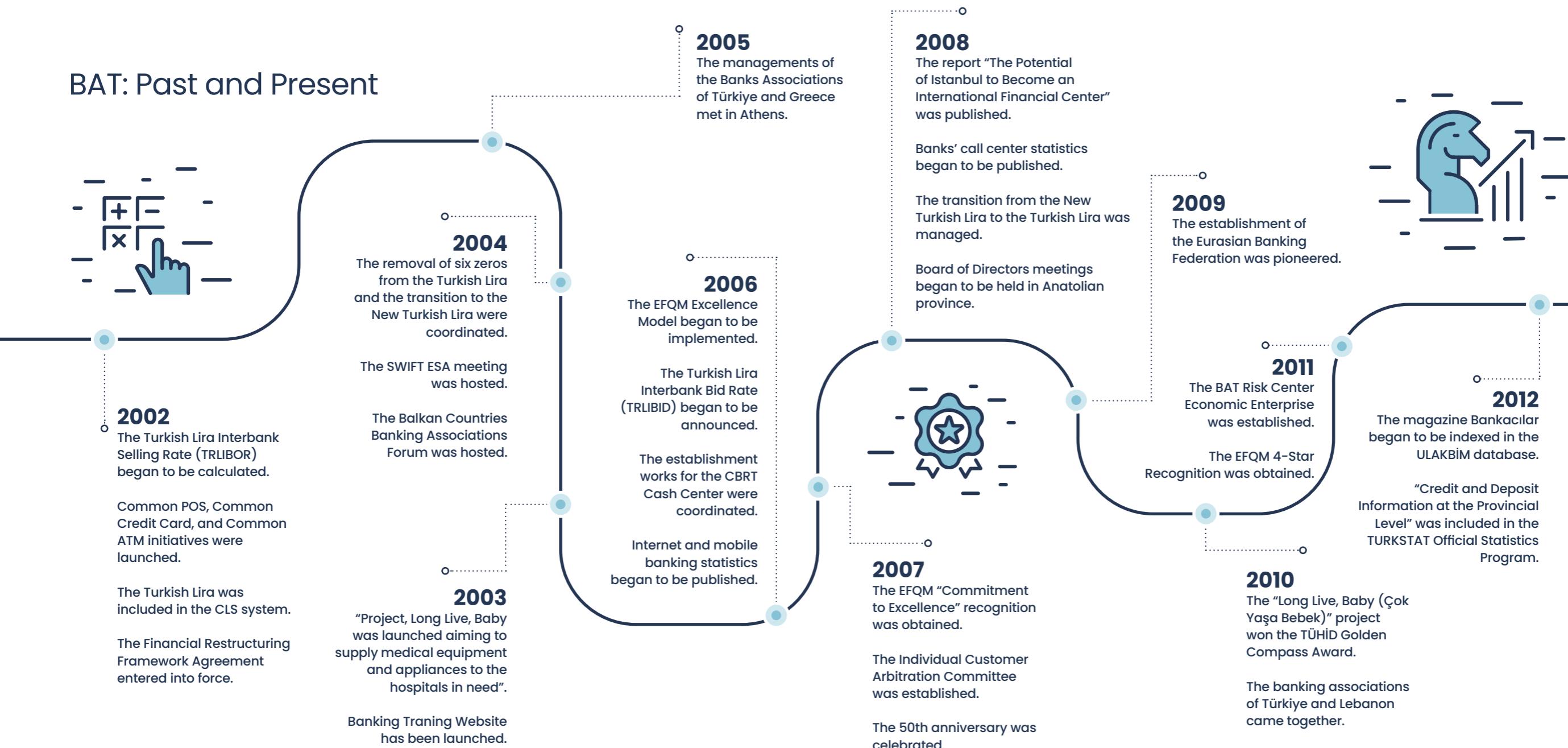
Bank balance sheets began to be published on the website.

The BAT's 40th anniversary was celebrated.

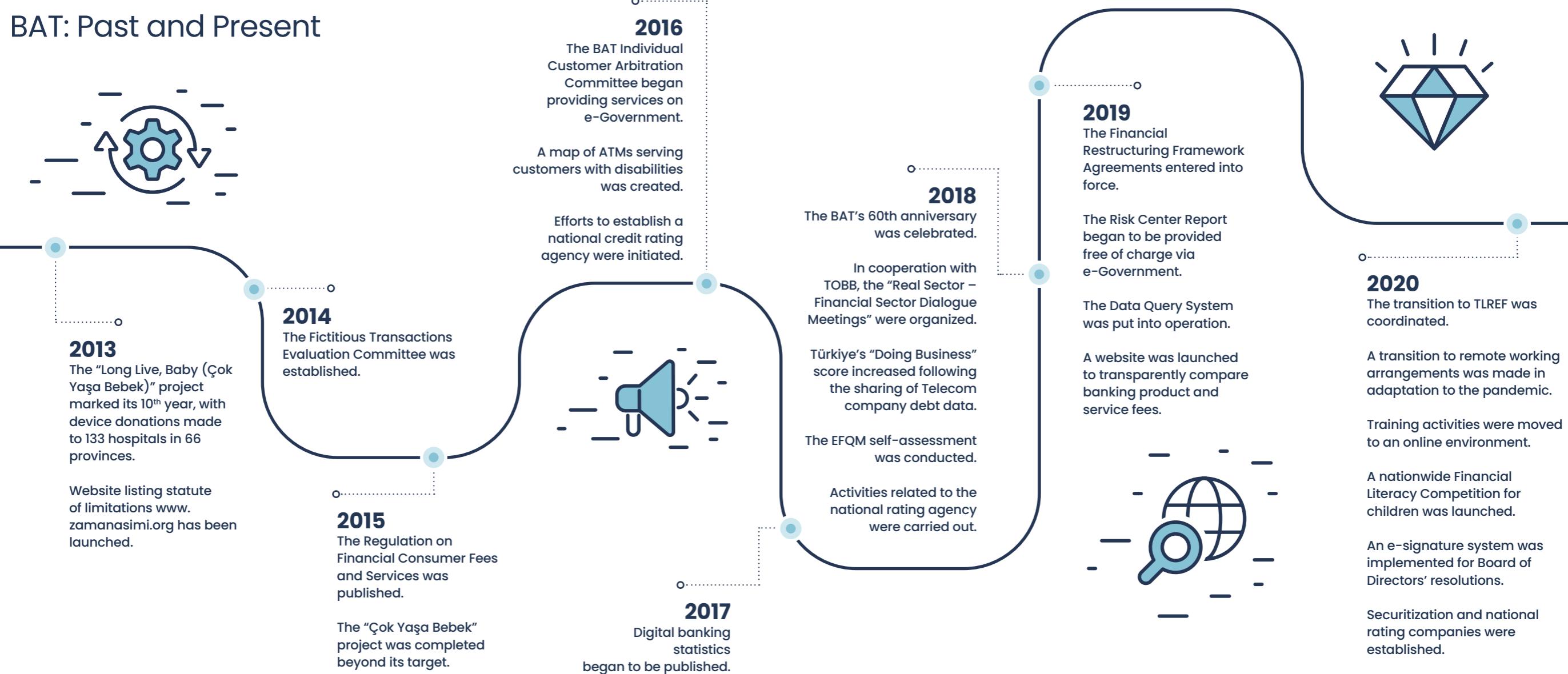
2001

Solution proposals for the banking sector were developed during the economic crisis period.

BAT: Past and Present



BAT: Past and Present



BAT: Past and Present

2021

Following the forest fires, 925,460 saplings were donated through the coordination of the Azerbaijan Banks Association.

Commercial credit data began to be shared on a daily basis.

Risk Center data were enhanced.

Contributions were made to the FAST payment system.

The Sustainability Guidelines were updated.

The remote customer onboarding application was launched.

An application was submitted for EFQM Excellence.

Vision, Purpose, and Core Values were updated.

A new restructuring framework entered into force for debtors with liabilities below and above TRY 100 million.



2022

The Council of Banking Associations of Turkic States was established.

The banks' shareholding process in İhracatı Geliştirme A.Ş. (Export Development Inc.) (IGE) was completed.

The Open Banking transition process was coordinated.



2023

"Sustainability in the Banking Sector: Sector Outlook Report" was published.

The BAT's first Sustainability Report and Sustainability Policy were published, and ISO 14001 Certification was obtained.

To mark the 100th anniversary of the Republic, the book "The Turkish Banking Sector in the 100th Anniversary of Our Republic" was published.

The report on women entrepreneur loans was published.

Coordination activities were carried out following the Kahramanmaraş earthquakes.

The scope of the e-Government Risk Report was expanded.



2024

The principle of "Sustainability" was added to the BAT Core Values.

Emission and Environmental Management Policies were published, and ISO 14064 Certification was obtained.

"Heat Map Methodologies Guide" was published.

Information on "guaranteed loans" was added to the e-Government Risk Center.

The Risk Center Report began to be offered across all channels with updated data.

The Türkiye Financial Sector Payment Systems Report was published.

With the regulation under the Personal Data Protection Law, a 10-year data-sharing period was introduced.

Corporate Governance

The administrative structure of the Association is supported by units operating under the Secretariat General.

The governing bodies of The Banks Association of Türkiye consist of the General Assembly, the Board of Directors, and the Auditors.

The General Assembly, as the highest decision-making body of the Association, consists of representatives of all member banks and is vested with the authority to elect the Board of Directors and the Auditors. In addition, it reviews and approves the annual budget together with the reports of the Board of Directors and the Auditors; evaluates proposals and requests submitted to the Board of Directors; and adopts decisions regarding the new operating year.

General Assembly meetings are chaired by the Chair of the Board of Directors; in the Chair's absence, this duty is performed by the Vice Chair.

The Board of Directors, which is the executive body of the Association, consists of members elected for a two-year term; the Chair of the Board of Directors is selected from among the general managers of the member banks. Expense participation shares, one-time entrance fees paid by banks, income surpluses carried forward from the previous year, donations, and other revenues constitute the Association's income sources, in line with its commitment to a responsible and transparent governance approach.

Internal audit within the Association is carried out through the review of all accounts and transactions and their submission to the General Assembly; in addition, the Association is subject to external audit by an independent audit firm, and its financial transactions are regularly reviewed.

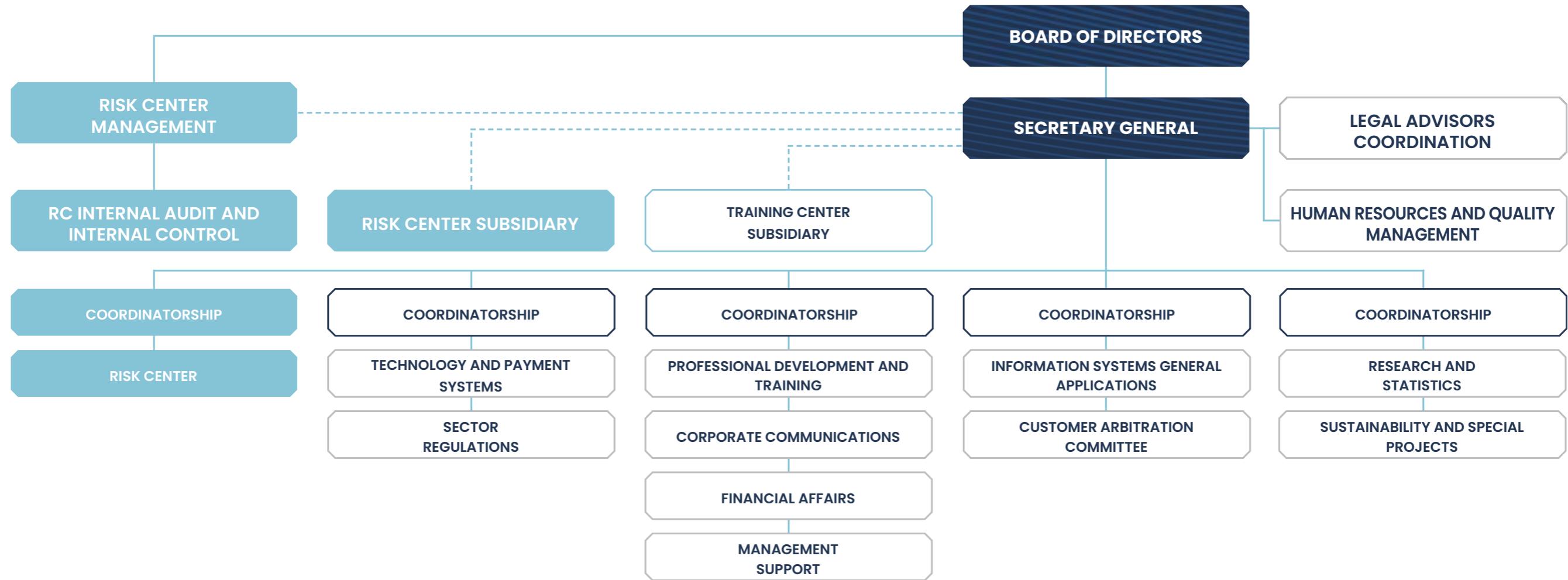
In addition, a Chief Legal Advisor and an Advisory Board operate under the Board of Directors; the Advisory Board contributes to the Association's decision-making processes by providing advisory opinions and recommendations to the Board of Directors.

The administrative structure of the Association is supported by units operating under the Secretariat General. These units include Research and Statistics, Sector Regulations, Sustainability and Special Projects, Professional Development and Training, Corporate Communication, Risk Center, Risk Center Internal Audit and Internal Control, Management Support, Technology and Payment Systems, Customer Arbitration Committee, Human Resources and Quality Management, Financial Affairs, and Information Systems and Digital Applications. This structure ensures that the BAT's activities are carried out in an effective, transparent, and holistic manner.



Corporate Governance

BAT Organizational Chart



Corporate Governance

The BAT Board of Directors and Auditor Members¹

CHAIR OF THE BOARD OF DIRECTORS

T.C. Ziraat Bankası A.Ş.	Alpaslan Çakar	CEO (General Manager)
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VICE CHAIR OF THE BOARD OF DIRECTORS

T. Vakıflar Bankası T.A.O.	Abdi Serdar Üstünsalih	CEO (General Manager)
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MEMBERS OF THE BOARD OF DIRECTORS

T. İş Bankası A.Ş.	Hakan Aran	CEO (General Manager)
T. Halk Bankası A.Ş.	Osman Arslan	CEO (General Manager)
T. Garanti Bankası A.Ş.	Mahmut Akten	CEO (General Manager)
Akbank T.A.Ş.	Cenk Kaan Gür	CEO (General Manager)
Yapı ve Kredi Bankası A.Ş.	Gökhan Erün	CEO (General Manager)
Türk Eximbank	Ali Güney	CEO (General Manager)
Türk Ekonomi Bankası A.Ş.	Ümit Leblebici	CEO (General Manager)
HSBC Bank A.Ş.	Burçın Ozan	CEO (General Manager)
ING Bank A.Ş.	Alper İhsan Gökgöz	CEO (General Manager)
Odea Bank A.Ş.	Mert Öncü	CEO (General Manager)
Citibank A.Ş.	Ömer Emre Karter	CEO (General Manager)

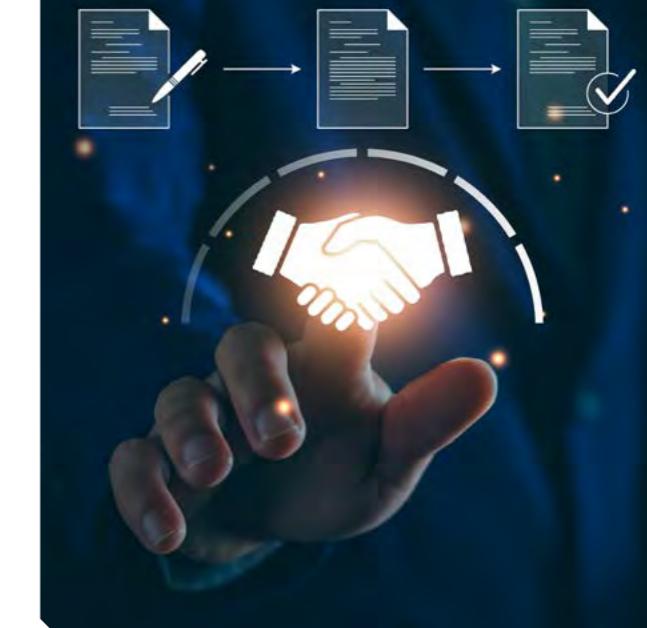
BOARD OF DIRECTORS AND AUDITOR MEMBERS²

QNB Bank A.Ş.	Ömür Tan	CEO (General Manager)
T. Kalkınma ve Yatırım Bankası A.Ş.	i. Halil Öztürk	CEO (General Manager)
Fibabanka A.Ş.	Ömer Mert	CEO (General Manager)

¹ The table shows the Board of Directors and its Members as of 2025.

² The General Assembly elects three banks as Auditors from among the banks not represented on the Board of Directors for a two-year term.

Pursuant to Article 79 of Banking Law No. 5411, all deposit banks as well as development and investment banks operating in Türkiye are required to be members of the BAT. As of the end of 2022, the list of member banks is presented under the heading 'Member Banks' in the report's 'Appendices' section.



Corporate Governance

Detailed information about the BAT Working Groups can be accessed [here](#).



BAT Working Groups

Various working groups operate within the BAT to strengthen sectoral expertise, ensure consistency in implementation, and contribute to policy development processes. These groups conduct work on technical, legal, and operational issues that support the sustainable, secure, and inclusive development of the banking system.

- Disaster Preparedness and Business Continuity Working Group:** Develops policy and procedure recommendations to ensure service continuity in the banking sector during disasters and emergencies.
- Bank Cards and Credit Cards Working Group:** Carries out standardization and compliance activities on regulations, implementation, and security matters related to card payment systems.
- Banking Ethics Principles Working Group:** Promotes the adoption of ethical values in the banking profession and prepares updates on ethical principles and implementation guidelines.
- Digital Banking Working Group:** Monitors digitalization processes and works on integrating new technologies into the sector while ensuring regulatory compliance.
- Anti-Fraud Working Group:** Provides sectoral coordination in combating financial fraud, raising awareness, and facilitating information sharing.
- Training Strategies Working Group:** Evaluates banking professional development programs and supports aligning training content with industry needs.

Economy Working Group: Analyzes developments in the Turkish and global economy and evaluates the impact of macroeconomic trends on the sector.

Accessible Banking Working Group: Contributes to the development of inclusive banking practices to facilitate access to financial services for persons with disabilities.

Legal Advisors Working Group: Evaluates and interprets banking-related legislation and provides legal opinions for its implementation.

Foreign Exchange Legislation Working Group: Ensures consistency in practices related to foreign trade transactions, foreign exchange legislation, and foreign exchange policies.

Personal Data Protection Working Group: Carries out activities to ensure personal data security in the banking sector and to support compliance with the Personal Data Protection Law.

Housing Loans Working Group: Evaluates housing finance processes, loan practices, and regulations related to consumer rights.

Credit and Provisions Working Group: Develops recommendations to harmonize sector-wide processes related to credit allocation, monitoring, classification, and provisioning.

Financial Matters Working Group: Conducts analyses of legislation and practices related to taxation, accounting, and financial reporting.

Accounting Working Group: Provides sector-wide guidance on the preparation of financial statements and compliance with accounting standards.

Customer Complaints Arbitration Committee Working Group

Evaluates mechanisms that support the fair and swift resolution of disputes arising in bank-customer relationships.

Money Markets Working Group: Coordinates and shares information on money market instruments, interest rate policies, and liquidity management.

Capital Markets Regulations Working Group: Monitors capital markets regulations and supports banks' compliance processes.

Insurance Working Group: Develops standards related to bancassurance practices, insurance legislation, and customer information processes.

Sustainability Working Group: Conducts activities on sustainable finance and environmental and social governance risk management topics, including the green asset ratio, taxonomy, climate change financing, and climate change heat maps.

SWIFT Türkiye User Working Group: Supports consistency in the implementation of international payment systems and SWIFT message standards.

BAT-MASAK Working Group: Contributes to financial intelligence and compliance processes within the scope of combating money laundering and the financing of terrorism.

CBRT Payment Systems Working Group: Works on payment systems, infrastructure security, and innovative payment solutions in coordination with the Central Bank of the Republic of Türkiye (CBRT).

Risk Management

The Association systematically evaluates risks arising from political, economic, social, technological, environmental, and legal factors within the framework of PESTEL analysis.



The Banks Association of Türkiye (BAT) has made risk management a key element of its strategic planning processes. Risk management has been positioned as a fundamental tool for strengthening institutional decision-making mechanisms, ensuring efficient use of resources, and supporting sustainable value creation.

At the BAT, the risk management approach begins with the Ecosystem Analysis conducted by the Research Department as part of strategic planning activities. This analysis identifies short-, medium-, and long-term trends that may affect the BAT's activities by examining economic and financial developments at the global and local levels. The assessments conducted within the scope of the Ecosystem Analysis are examined under three different scenarios: baseline, optimistic, and pessimistic. In each scenario, inputs for strategic orientations are generated by taking into account potential impacts and the likelihood of occurrence.

This work continues with the PESTEL Analysis (analysis of political, economic, social, technological, environmental, and legal factors), which forms the backbone of the Association's strategic planning process. The PESTEL Analysis enables the identification of opportunities and threats in the external environment across political, economic, social, technological, environmental, and legal dimensions, and these findings constitute the main inputs to the SWOT (Strengths, Weaknesses, Opportunities, Threats) analysis.

The SWOT Workshop, held annually, is conducted with the participation of all Association employees.

- In the first stage, employees separately assess strengths and weaknesses, as well as opportunities and threats.
- In the second stage, these elements are brought together to define strategic orientations.

The SWOT analysis outputs form the basis for the objectives to be implemented within the framework of the BAT's Strategic Action Plan (SAP). These objectives are prioritized based on criteria such as ease of implementation (resource and workforce requirements) and alignment with institutional priorities.

The BAT's risk management system aims not only to monitor existing threats but also to anticipate risks that may arise in the future. In this context, the Association systematically evaluates risks that may arise from political, economic, social, technological, environmental, and legal factors within the framework of the PESTEL analysis. For each factor, potential impacts, likelihood of occurrence, and strategic priorities are taken into account.

With this approach, the potential impacts of changes in policies and regulations on the sector; the effects of economic developments on the banking sector; technological risks and opportunities arising from the digitalization process; the implications of social trends and talent management for institutional processes; opportunities created by environmental factors from a sustainability perspective; and compliance requirements arising from regulations within the legal framework are addressed in an integrated manner.

The BAT regularly analyzes outputs derived from data analytics, stakeholder feedback, internal process reviews, best practice examples, and sustainability assessments in order to effectively manage these risks. Thus, risk management has become not only a control process but also a tool for organizational learning, strategic alignment, and continuous improvement.

Environmental and Social Risks

BAT views environmental, social, and governance (ESG) risks not only as threats but also as opportunities for sectoral transformation, sustainable growth, and the creation of societal value.

The BAT considers environmental and social risk management an integral part of its institutional risk management approach. Although the Association does not have direct production or investment activities, it closely monitors the indirect effects of environmental and social risks on the financial system and provides guidance to ensure these effects are effectively managed across the sector.

The BAT draws on international best practices in sustainable finance, environmental and social governance risk management, and climate-related risks in its activities with the sector. In this context, the Association adopts an approach aligned with internationally recognized initiatives and frameworks, including but not limited to UNEP FI (United Nations Environment Programme Finance Initiative), TCFD (Task Force on

Climate-related Financial Disclosures), NGFS (Network for Greening the Financial System), IPCC (Intergovernmental Panel on Climate Change), BIS (Bank for International Settlements), OECD general approaches, the EU Taxonomy, IFRS S1 (General Requirements for Disclosure of Sustainability-related Financial Information), IFRS S2 (Climate-related Disclosures), and the Equator Principles (a framework for environmental and social risk management in project financing).

Within the Association, various sub-working groups operate to manage environmental and social risks, assess climate-related opportunities, and support sectoral adaptation processes. The BAT aims to create an appropriate working environment to support the sector in adapting needs and expectations to Türkiye by collaborating with member banks, relevant public institutions, international sustainability frameworks, international development banks, and other associations, in order to achieve the desired outputs from the working groups.

- **The Green Asset Ratio Sub-Working Group** carries out activities to develop technical criteria for calculating banks' green asset ratios and to establish implementation standards.
- **The Climate Risk Sub-Working Group** assessed the financial sector's exposure to physical climate risks through the Heat Map Methodology Report prepared with contributions from member banks.
- **The Climate Transition Finance Technical Sub-Working Group** ensures the standardization of

definitions and practices related to transition finance.

- **The Sustainability Reporting Sub-Working Group** operates to provide guidance on the implementation of TSRS (Türkiye Sustainability Reporting Standards) and to support the dissemination of best practices across the sector.

The BAT's approach to environmental, social, and governance (ESG) risks is not limited to identifying potential threats but also encompasses the strategic assessment of opportunities in these areas. In this regard, the Association regularly conducts PESTEL analyses to identify opportunities and threats.

The BAT views environmental, social, and governance risks not only as threats but also as opportunities for sectoral transformation, sustainable growth, and the creation of societal value. Accordingly, the BAT:

- guides member banks in green transformation and sustainable finance processes, and
- ensures coordination with public institutions and stakeholders for the effective implementation of climate change-related regulations.

The BAT's approach aims to support sustainable development by fostering sectoral growth while safeguarding rights and interests, enhancing competitiveness, and promoting the development of an inclusive financial ecosystem that manages environmental and social impacts.



Ethics and Compliance

The BAT Ethics Commission oversees compliance with ethical principles across the sector and examines ethical violations.



The Banks Association of Türkiye considers the adoption and maintenance of ethical values and behaviors that form the foundation of social relations a core principle for both its own employees and the banking and finance sector as a whole.

In this context, the Association regularly informs its employees about bribery, corruption, and unethical conduct, carries out awareness-raising activities, and monitors ethical behavior indicators within the performance management system.

The Banking Ethical Principles, which entered into force in 2001, were established to set good practice

standards in the financial sector, support a fair and honest competitive environment among banks, strengthen transparency in stakeholder relations, and enhance the reputation of the banking profession.

Within the framework of these principles, the BAT Ethics Commission, which became operational in 2008, oversees compliance with ethical principles across the sector and examines ethical violations.

The establishment of the Commission was carried out in accordance with the "Regulation on the Principles of Ethical Conduct for Public Officials and the Procedures and Principles for Applications," published in the Official

Gazette dated April 13, 2005, No. 25785.

The Ethics Commission, established by the decision of the BAT Board of Directors dated October 20, 2009 (No. 67), operates under the authorization of the Chair of the Board of Directors. The members of the Commission are notified to the Ethics Board for Public Officials of the Republic of Türkiye together with their curricula vitae.

In addition, the Ethics Disciplinary Board was established in 2009 to assess applications concerning allegations of violations of ethical principles by Association employees.

To embed an ethical culture at the organizational level, the BAT bases its activities on the principles of transparency, accountability, fairness, and integrity, and operates effective control and oversight mechanisms to prevent ethical violations.

As of 2024, no ethical violations were identified within the Association in relation to bribery and corruption, discrimination or harassment, customer data privacy, conflicts of interest, or money laundering or insider trading.

Detailed information on the duties and activities of the **BAT Ethics Commission** is available on the BAT Ethics Commission page on the BAT's official website.

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Sustainability Governance

BAT's sustainability governance model aims to contribute not only to its own area of activity but also to raising awareness and fostering a culture of good practices across the sector.

The Banks Association of Türkiye (BAT) considers sustainability an integral part of corporate governance and adopts a management approach that balances economic, environmental, and social dimensions. In this context, sustainability principles are integrated into the BAT's strategic planning processes, and the monitoring of defined targets is carried out systematically.

Sustainability Governance Structure at the BAT

At the core of the BAT's sustainability governance structure lies the Sustainability Committee. The Committee is responsible for setting policies and targets, monitoring implementation, and making necessary updates. The Committee's proposals are reviewed and approved by the Board of Directors. In addition:

The Sustainability and Special Projects Department ensures the integration of established strategies into internal processes and oversees the monitoring of sustainability performance.

The Association's sustainability approach is shaped around the Sustainability Policy. This policy encompasses core principles such as commitment to corporate governance principles, respect for ethical values, equal opportunity, respect for human rights, occupational health and safety, resource efficiency, reduction of environmental impacts, and transparency. Within this framework, the BAT conducts its activities with a zero-tolerance approach to bribery and corruption and fosters an inclusive and safe working environment that supports employee development.

At the operational level, the environmental impacts of resource use are regularly monitored, and adverse impacts are reduced through energy efficiency, waste management, and digitalization practices. Sustainability principles are taken into account in procurement processes, and efforts are undertaken to raise awareness among business partners.

The BAT's sustainability governance model aims to contribute not only to its own area of activity but also to raising awareness and fostering a culture of good practices across the sector. The policies and organizational structures established in this direction provide a framework that supports the Association's vision for sustainable development.

The BAT Sustainability Policy can be accessed [here](#).



Sustainability Governance

BAT plays a coordinating and guiding role in the banking sector to promote the widespread adoption of sustainability practices, advance sustainable finance, and contribute to the green transformation process.



The Banks Association of Türkiye (BAT) views sustainability not merely as a policy area but as a strategic priority aimed at strengthening financial stability, enhancing social welfare, and embedding environmental responsibility within its institutional culture. The Association's sustainability approach has a holistic structure, encompassing both its own institutional activities and the initiatives it undertakes across the banking sector.

Internal Initiatives

The BAT adopts a sense of responsibility encompassing all employees by embedding sustainability principles into its institutional culture. The Association regards the creation of a work environment grounded in respect for human rights, ethical values, and equal opportunity as a core principle.

In this context, the BAT ensures that its employees work in a safe, inclusive, and development-oriented environment. Discrimination based on gender, age, disability status, belief, political views, or other personal characteristics is not permitted. Strengthening women's roles in the business world, increasing representation at senior management levels, and ensuring access to equal opportunities are among the priority objectives.

The Association conducts regular training programs to support the professional and personal development of its employees and promotes sustainability awareness across the organization. In employee training programs, particular emphasis is placed on sustainability, ethical principles, human rights, environmental management, and information security.

The BAT also aims to improve its environmental performance by effectively leveraging digitalization and technological innovations in its business processes. A continuous improvement approach is adopted with respect to energy efficiency, resource conservation, waste management, and the reduction of the carbon footprint. Environmentally friendly practices are encouraged in work environments, and recycling processes are regularly monitored.

The Association monitors the environmental impacts of resource use and takes the necessary measures to mitigate adverse effects. Digital transformation initiatives enhance operational efficiency while minimizing environmental impact through reduced paper consumption.

The BAT's approaches support not only the enhancement of environmental and social performance but also the strengthening of employee engagement, productivity, and organizational cohesion.

Sectoral Initiatives

The BAT plays a coordinating and guiding role in the banking sector to promote the widespread adoption of sustainability practices, advance sustainable finance, and contribute to the green transformation process. In this regard, efforts are undertaken to establish a shared understanding and consistency of practice across the sector on sustainability issues.

Since 2009, the **Sustainability Working Group** has facilitated knowledge sharing on banks' management of environmental, social, and governance risks, sustainable finance practices, reporting standards, and climate-related risks, and has contributed to the dissemination of best practices.

In recent years, the Climate Transition Finance Technical Sub-Working Group, **together with the Green Asset Ratio, Climate Risk, and Sustainability Reporting sub-working groups established within the Association and operating under the Sustainability Main Working Group**, have been providing sector-wide guidance on technical alignment, data standards, and reporting in the green transition of the financial system. Through these groups, work is carried out on indicators aligned with the EU Taxonomy, methodologies for measuring environmental and social risks, and sustainable finance criteria.

The BAT also organizes various training and awareness programs through the BAT Training Center to enhance banks' knowledge and capacity in sustainable finance. These training programs focus on topics such as sustainability reporting, the financial impacts of climate-related risks, and environmental and social management systems.

The Association closely monitors global developments in sustainability and draws on internationally recognized initiatives and frameworks, including but not limited to UNEP FI, TCFD, NGFS, IPCC, BIS, and the EU Taxonomy.

In this context, BAT actively contributes to regulatory efforts aimed at managing climate-related risks across the sector, defining sustainable finance, establishing green investment criteria, and developing environmental and social governance standards.

In addition, through sector-wide awareness-raising activities in financial literacy, digitalization, and data security, it supports the sustainable growth of the banking sector and the strengthening of responsible banking practices.



Stakeholder Engagement and Collaborations

According to the survey results conducted in 2024, the overall satisfaction rate with the Association's services provided to the sector and society was measured at 97%.

The Banks Association of Türkiye (BAT) conducts its activities through open, transparent, and trust-based communication with its stakeholders. When identifying the material topics that will shape institutional strategies, stakeholder views are taken as a basis; these views are translated into improvements in strategic planning, service quality, and communication processes.

The opinions, suggestions, and notifications submitted to the Association are carefully evaluated, and each item of feedback is regarded as a factor contributing to the enhancement of the BAT's institutional service quality. The BAT's stakeholders comprise a broad ecosystem including member banks, public institutions, regulatory authorities, national and international professional organizations, international development banks, foreign banking associations, foreign banks, employees, the media, academia, and society.

Communication with stakeholders is carried out through a multi-channel structure, including the Association's official website, call center, email and physical mailing addresses, social media accounts, meetings, seminars, conferences, and video conferences. In addition, the BAT Individual Customer Arbitration Committee operates as an effective mechanism for reviewing applications and complaints related to banking transactions. All messages received through social media and other channels are recorded by the Corporate Communication Department, shared with the relevant units, and feedback processes are managed with due diligence.

Since 2008, the BAT has regularly conducted the Stakeholder Satisfaction and Perception Survey to assess stakeholders' perceptions of its services and to disclose the results

to the public. According to the survey results conducted in 2024, the overall satisfaction rate with the Association's services provided to the sector and society was measured at 97%. In addition, improvement actions are defined based on the results of the Stakeholder Satisfaction Survey and the Employee Satisfaction Survey, which are conducted annually, and these actions are implemented through the relevant units.

Stakeholder engagement is one of the core elements of the BAT's sustainability strategy. In line with this approach, the Association maintains a broad network of collaboration aimed at developing practices that create shared value in the banking sector, enhancing financial inclusion, and strengthening awareness of sustainable finance.

At the national level, the BAT works in close cooperation with public authorities, primarily including—but not limited to—the Banking Regulation and Supervision Agency (BRSA), the Central Bank of the Republic of Türkiye (CBRT), the Ministry of Treasury and Finance, and the Capital Markets Board of Türkiye (CMB).

In addition, joint projects are carried out with the Participation Banks Association of Türkiye (TKBB), the Association of Financial Institutions (FKB), and other sectoral associations. At the international level, the BAT carries out activities that contribute to the sustainable transformation of the Turkish banking sector by following various global initiatives.

In this context, the BAT leads the sector's sustainable development through regular stakeholder communication and multi-stakeholder collaborations, while also supporting the advancement of banking within a framework that prioritizes social benefit.



Stakeholder Engagement and Collaborations

	Stakeholder Group	Communication Channel	Communication Frequency
Collaborations and Suppliers	Collaborations – Public Institutions	Official correspondence, email, telephone, website, social media, press releases, meetings, workshops, working groups	Ongoing
	Collaborations – Consultants	Official correspondence, email, telephone, website, social media, press releases, meetings	Ongoing
	Collaborations – Companies	Official correspondence, email, telephone, website, social media, press releases, meetings	Ongoing
	Collaborations – Training	Email, telephone, website, social media, press releases, meetings, training planning meetings	Ongoing
	Collaborations – Instructors	Email, telephone, website, social media, press releases, meetings, training planning meetings	Ongoing
	Collaborations – Academics from Finance and Banking Departments	Email, telephone, website, social media, press releases, meetings, academic collaboration meetings	Ongoing
	Collaborations – Professional Organizations	Email, telephone, website, social media, press releases, workshops, conferences, online and in-person seminars	Ongoing
	Suppliers	Email, telephone, website, social media, press releases, contract management	Ongoing
Business and Governance	Governance Stakeholders – Public Institutions	Official correspondence, email, telephone, website, social media, meetings, report submissions	Ongoing
	Business Stakeholders – Board of Directors	Board meetings, email, telephone, website, social media, press releases	Ongoing
	Business Stakeholders – Risk Center Board of Directors	Board meetings, email, telephone, website, social media, press releases	Ongoing

* In addition, a Stakeholder Satisfaction Survey (PMA) is conducted once a year for all external stakeholders.

Stakeholder Engagement and Collaborations

Stakeholder Group		Communication Channel	Communication Frequency
Society	Society	Website, social media, press releases	Ongoing
	Society – General Public	Website, social media, press releases	Ongoing
	Society – Media	Press conferences, press releases, interviews, social media	As needed / In the event of significant developments
	Society – Internet Users	Website, social media, press releases	Ongoing
	Society – Students	Training/seminar announcements, social media, press releases, website	Several times a year
	Society – Academics	Email, academic events, social media, press releases, website	Several times a year
Employees	Employees	Surveys, BizBize meetings	Employee Satisfaction Survey (ÇMA), once a year BizBize meetings, once a month
Customers	Customers – Bankers (Working Groups)	Working group meetings, official correspondence, email, telephone, website, social media, press releases, workshops	Ongoing
	Customers – Risk Center (Coordination Officers)	Email, system updates	Ongoing
	Customers – Finance and Banking Training Portal Users	Email, portal announcements	Ongoing
	Customers – Training and Seminar Participants (Bankers)	Email, post-training surveys	Ongoing
	Customers – Training and Seminar Participants (Students)	Email, social media announcements, post-training surveys	Ongoing
	Customers – Committees	Committee meetings, email	Ongoing

* In addition, a Stakeholder Satisfaction Survey (PMA) is conducted once a year for all external stakeholders, and an Employee Satisfaction Survey (ÇMA) is conducted for employees.

Materiality Analysis

This year, the BAT conducted a comprehensive materiality analysis to identify its sustainability priorities through a scientific methodology and to align its strategic decision-making processes with stakeholder expectations. The analysis was conducted based on a double materiality approach, addressing both the impacts of environmental, social, and governance (ESG) topics on the Association's activities and the Association's impacts on the environment and society.

The analysis process consisted of six main stages:

1. Development of the Material Topics List:

In the first stage, global and national sustainability trends, regulatory authority guidelines, sectoral reports, and the Association's strategic priorities were evaluated collectively. Within this scope, potential material topics relevant to the BAT were identified by taking into account the United Nations Sustainable Development Goals, international financial reporting standards, and the practices of comparable professional associations. As a result of the desk research conducted, 13 core sustainability topics specific to the financial sector were identified.

2. Stakeholder Analysis:

In the second stage, the views and expectations of stakeholders within the BAT's direct and indirect spheres of impact were assessed. A stakeholder group of approximately 200 individuals, comprising employees, customers (bankers), collaborations (public institutions and international partners), and society (consultants, companies, professional organizations, and the media), was included in the process. The participation rate was 68%, and stakeholders' perceptions and priorities regarding sustainability topics were collected through

surveys.

3. Executive Interviews:

In the third stage, through a survey process conducted with the BAT's senior management, the relationship between the identified sustainability topics and institutional strategy and operational processes was assessed. Senior management analyzed the impacts of the topics on the Association's activities, their strategic importance, and their long-term value creation potential.

4. External Trends and Sector Analysis:

In the fourth stage, the sustainability priorities of professional associations and financial sector organizations operating at both international and national levels were examined. A comparative assessment aligned with the BAT's sectoral position was conducted by referencing frameworks such as the European Banking Federation (EBF), the Institute of International Finance (IIF), and the United Nations Environment Programme Finance Initiative (UNEP FI).

5. Impact Analysis:

In the fifth stage, each topic was assessed bidirectionally by considering both its impact on the BAT's activities and the BAT's impact on the topic. The impact analysis provided a framework to determine the scope of the BAT's relationship with sustainability themes, its potential positive contributions, and the risks and opportunities requiring management.

6. Risk and Opportunity Analysis:

As a result, the material topics of highest priority highlighted in the BAT's sustainability agenda were identified as data security and cyber resilience, regulatory compliance and capacity building, ethics and compliance, and the sectoral sustainability agenda and guidance. This analysis serves as a fundamental guide in the development of the BAT's sustainability strategy for the 2026–2028 period; it strengthens the Association's data-driven, inclusive, and impact-focused sustainability approach.

BAT Materiality Matrix



Material Topic	Relevant Sustainable Development Goal (SDG) Relevance	Priority Level According to Stakeholders					Society (Consultants, Companies, Professional Organizations, and Media)
		Senior	Employees	Customers	Collaborations (Public Institutions and International collaborations)		
Sectoral Sustainability Agenda and Guidance	  	+++	++	+++	++		+
Climate Change	 	+++	+	+++	+++		+
Sustainable Finance	 	+	+	+++	+++		++
Environmental and Social Risks	 	+++	+++	+++	+		++
Financial Inclusion and Financial Literacy	 	+++	+++	+	+++		+++
Data Security and Cyber Resilience		+++	+++	+++	+++		+++
Ethics and Compliance		++	+++	++	++		+++
Equity, Diversity, and Inclusion	 	+++	++	+	+		++
Regulatory Compliance and Capacity Building	 	++	+++	+++	+++		+++
Digital Transformation	 	++	+++	++	+++		++
Environmental Responsibility	 	+++	+	+	+		++
Employee Satisfaction and Well-being		+	+++	++	++		+++
Stakeholder Engagement and Collaborations	 	+	++	++	++		++

+ Material Topics

++ High Material Topics

+++ Very High Material Topics

Working Life at BAT



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Employee Demographics

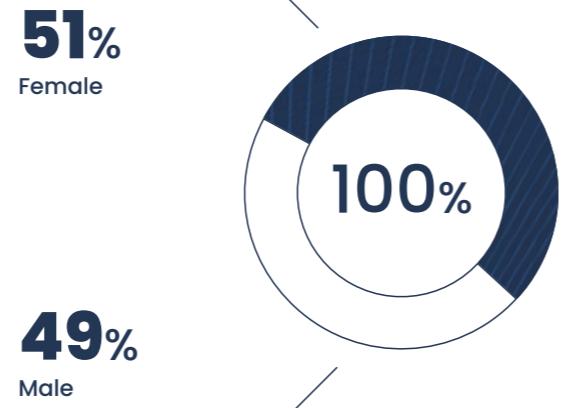
At BAT, 51% of employees are women, while 49% are men.



Human resources management at the BAT is carried out with a focus on addressing the diverse expectations of employees. Processes are designed to foster a safe, fair, and inclusive working environment; team spirit is strengthened, and internal synergy is enhanced. With a value-oriented approach, human capital is regarded as the most important resource, and open communication is prioritized. Motivation is enhanced, achievements are rewarded, and creativity and innovation are encouraged. Thus, employee development is supported, and institutional performance is advanced in a sustainable manner.

The Association's greatest strength lies in its human capital. In 2024, activities are carried out by a team

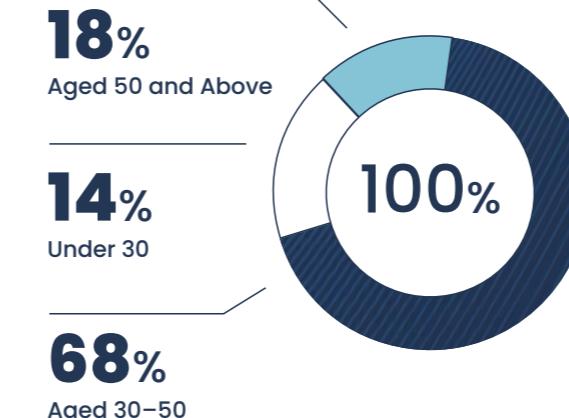
Employees by Gender



of 78 employees. All employees are white-collar and employed on a full-time basis. 51% of employees are women, while 49% are men.

The right to unionize is supported at the BAT, and employees may become union members in accordance with International Labour Organization standards and national legislation. Through collective bargaining agreements, employee rights are supported, and processes such as grievance management, salary determination, and benefits administration are managed to safeguard employees' rights throughout their employment. 42% of employees are covered by a collective bargaining agreement.

Employees by Age



In terms of age distribution, 14% of employees are under 30, 68% are between 30 and 50, and 18% are aged 50 and above. This composition brings together the energy of younger colleagues with the expertise of experienced employees.

Diversity in tenure supports both the continuity and renewal of the institutional culture. Two-thirds of employees have a tenure of 0–5 years, while 15 employees have 5–10 years of tenure and 15 employees have more than 10 years of service. Thus, the institutional culture is both renewed and strengthened.

Employees by Term of Employment



Training and Development

In 2024, total training hours increased by 26%.

The personal and professional development of employees is regarded as one of the most critical drivers of sustainable success. Accordingly, training programs are implemented to both strengthen existing competencies and equip employees with future-oriented skills.

In 2024, employees received a total of 3,359 hours of training, representing a 26% increase in total training hours compared to 2023. This increase in training capacity has demonstrated a strong commitment to the continuous development of employees' knowledge and competencies. Investment in training likewise increased compared to the previous year. These investments are managed in line with the annual budgets prepared for each department during the planning periods and are implemented through plans approved under the coordination of Human Resources. In this way, training investments are systematically aligned with the Association's objectives.

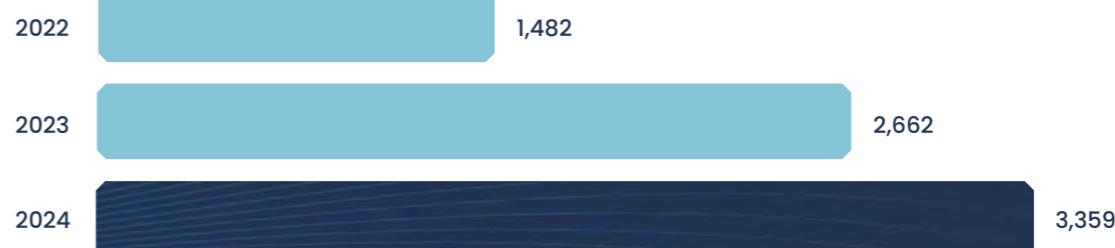
Employees benefit from training support by submitting individual requests through the BAT Training Center catalogs. In addition, group training programs focused on strengthening the institutional culture are organized by the Human Resources Department. These training programs may also be conducted outside the city with accommodation to enhance employee motivation. A comprehensive orientation program is implemented for newly hired employees, offering extensive content ranging from meeting ergonomic needs and institutional introduction to the communication of general rules and human resources practices.

A comprehensive Leadership Development Program is implemented to strengthen the managerial skills of employees preparing for leadership positions within the BAT. Employees newly appointed as managers or positioned as managerial candidates receive training in areas such as strategic thinking, team management, decision-making, and communication as part of this eight-month program. The program aims to strengthen the understanding of sustainable leadership across the Association.

In addition, increasing knowledge and awareness in the field of sustainability is among the key priorities. Accordingly, in 2024, comprehensive training programs covering topics such as climate change and its impacts, environmental and social risks, waste management, greenhouse gas emissions, and environmental management were delivered with the participation of all employees. These training programs aim to strengthen participants' sustainability awareness at both technical and conceptual levels. Through these programs, the BAT aims to embrace its environmental responsibilities at the institutional level and enable employees to actively contribute to sustainability targets.



Total Training Hours





Performance Management

In 2024, the number of white-collar employees included in the regular performance evaluation process reached 77.

Through performance management, employees' strengths are reinforced, areas for development are identified, and a strong feedback culture is fostered. Individual contributions are aligned with the Association's objectives, and employee motivation is enhanced. The performance period is conducted in parallel with the BAT's budget period and is planned to cover the period from 1 July to 30 June each year. Evaluations are conducted once a year, and

institutional strategies are reflected in individual targets.

In 2024, the number of white-collar employees included in the regular performance evaluation process reached 77. The increase in the number of employees and the decrease in the proportion of fixed-term employees have led to an expansion in the scope of performance evaluation.

Performance Management	2022		2023		2024	
	Female	Male	Female	Male	Female	Male
Number of White-Collar employees undergoing regular performance evaluation	39	31	40	36	40	37



Equity, Diversity, and Inclusion

In 2024, the proportion of women in managerial positions reached 46%.

The human resources approach at the BAT is founded on the principles of equity and inclusiveness. No discrimination is made on the basis of gender, age, disability status, or any other grounds in recruitment, compensation, and career development processes. The nature of the work and the job description are taken as the basis, and a fair evaluation system is applied for employees.

As of 2024, women account for 51% of employees, while men account for 49%. Efforts to increase women's representation in managerial positions are ongoing. In 2024, the proportion of women in managerial positions reached 46%. At the BAT, the strong representation of —

particularly at the director and deputy director levels—is regarded as one of the most tangible indicators of an inclusive leadership approach.

Facilitating practices are offered in parental leave arrangements to support employees' work-life balance. In 2023, two female employees and in 2024, three female employees took maternity leave, and all returned to their positions and continued in their roles.

In line with the goal of fostering an inclusive and equitable working environment at the BAT, one employee with a disability is employed within the Association. Steps are taken to enhance accessibility

within the Association, supporting equal participation in work processes by considering both physical conditions and digital accessibility.

A zero-tolerance policy against all forms of discrimination is implemented at the BAT. Employees' wages are determined within the framework of the Collective Bargaining Agreement, and non-union employees also benefit from the same rights. Fringe benefits include meal, transportation, child allowance, and fuel support. Through all these practices, an equal, fair, and safe working environment is created for employees.

Employee Satisfaction and Well-being

In 2024, the employee turnover rate was 16.7%.

The health, well-being, and satisfaction of employees are regarded as one of the key pillars of sustainable success. The human resources approach is designed to enhance employee motivation and strengthen the institutional culture. Accordingly, private health insurance coverage is provided for both employees and their dependents. Psychological support services are provided to employees in need to help maintain their work-life balance.

Flexibility and balance are prioritized in work arrangements. Under the hybrid working model, employees work three days in the office and two days remotely each week. This approach enhances employee productivity while also providing flexibility and an improved quality of life.

Employee satisfaction is measured annually through an Employee Satisfaction Survey conducted by an independent research company. Employee feedback is collected across a wide range of areas, including well-being, compensation and benefits, strategy, institutional culture, performance and career management, development and change, appreciation and recognition, inclusiveness, leadership, internal communication, and future ways of working. In 2024, the survey result was recorded as 3.9 out of 5. Survey results are evaluated together with employees, and continuous improvement actions are taken based on the feedback received.

In 2024, the employee turnover rate was 16.7%. New practices are being developed to enhance employee engagement in order to reduce this rate. Accordingly, BizBize Meetings are held on a monthly basis to

gather employee feedback and strengthen internal communication. Held with the participation of all employees and the Secretary General, these meetings share developments across the Association and gather employees' views and suggestions through training sessions, informational presentations, and interactive discussions. These meetings make a significant contribution to enhancing employee motivation and strengthening the shared institutional culture. In addition, employee suggestions are collected through the BizBize Portal, and employees are rewarded for ideas that are implemented. Through initiatives in areas such as health, well-being, flexible working, and employee activities, a sustainable and motivating work environment is created for employees.

Social events are encouraged to increase employee engagement and internal interaction. Events organized by the Social Activities Committee foster synergy among teams. In addition, employee motivation is enhanced and solidarity is strengthened through music and sports clubs.



Employee Satisfaction Survey



³ Employee Satisfaction Survey scores are assessed on a scale of 5.

Occupational Health and Safety (OHS)

No occupational accidents have occurred at BAT over the past 10 years.

At the BAT, a proactive and continuous improvement-oriented approach is adopted to ensure full compliance with Occupational Health and Safety Law No. 6331 and all relevant legislation within the Occupational Health and Safety (OHS) management system. The management system is built on the early identification of risks, the implementation of necessary preventive measures, the encouragement of employee participation, and the dissemination of an occupational health and safety culture across all units of the Association.

Occupational Health and Safety activities are carried out with the support and coordination of senior management, with the participation of all employees ensured. Regular on-site inspections are conducted by OHS professionals (OHS Specialist, Workplace Physician, etc.), environmental measurements are carried out, and conditions are continuously monitored. The annual OHS plan is implemented in alignment with established targets, and the results are regularly reported to senior management.

Risk Management and OHS Committee

Occupational health and safety risks are managed through proactive assessments. The risk management process encompasses the identification, analysis, and prioritization of hazards, the implementation of preventive and corrective actions, and continuous monitoring. Regular on-site observations are carried out in work areas to identify potential hazards at an early stage. Environmental conditions are assessed through technical measurements, and the findings are combined with feedback received from employees. Before a new process or equipment is put into operation, a preliminary assessment process is always carried out to ensure that risks are mitigated before they arise.

The BAT fulfills its obligations under Occupational Health and Safety Law No. 6331 and is classified as a low-risk workplace under the applicable legislation. Within this framework, the OHS Committee comprises the employer's representative, OHS specialist, workplace physician, employee representative, and managers, and convenes four times a year to review risk analyses, accident records, and preventive actions. New risk areas and improvement opportunities are also addressed during meetings, and decisions focused on continuous improvement are taken.

A proactive approach is adopted across all work environments to address factors that pose risks to occupational safety and human health, and risk analyses are conducted. Risk identification processes are carried out using internationally recognized risk assessment methodologies. The assessments indicate that the BAT has a low-risk profile. Identified risks are

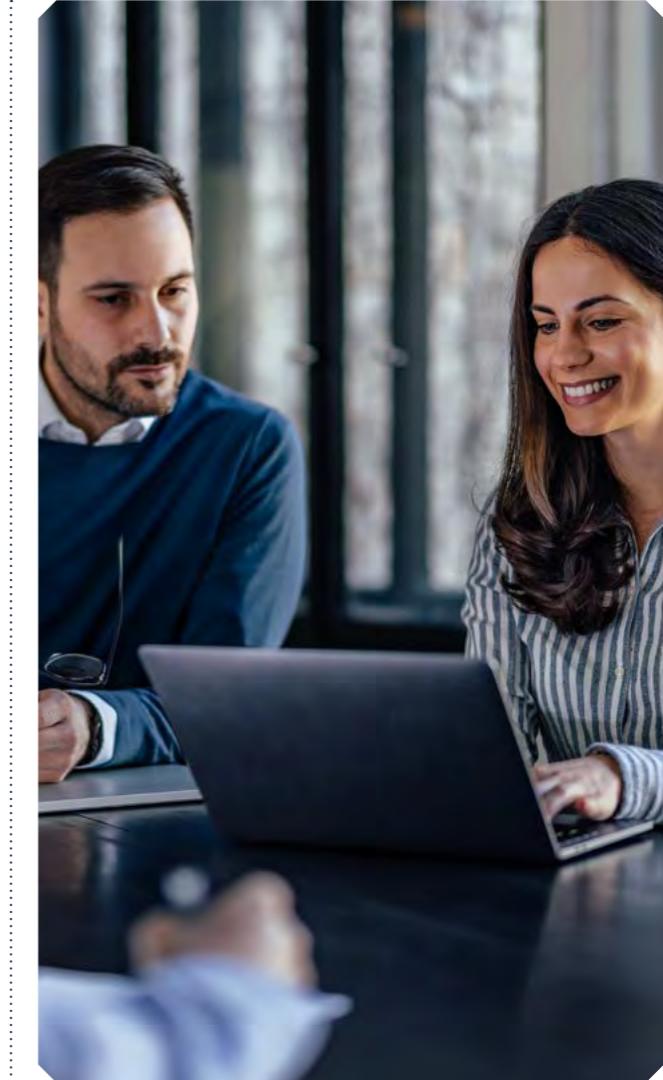
rated, and appropriate control measures are defined. Based on these results, emergency plans are developed, and the effectiveness of control measures is evaluated through the monitoring of implemented actions.

Action Plans and Preventive Actions

All identified risks are recorded and prioritized according to their severity levels. These assessments are carried out by the OHS Risk Assessment Specialist. Immediate preventive actions are taken for high risks, while medium risks are mitigated within the established timelines.

To ensure a rapid and effective response to emergencies, firefighting, first aid, rescue, and protection teams have been established at the BAT in accordance with applicable legislation. These teams receive regular training aligned with their duties and responsibilities and maintain their preparedness through practical drills conducted at least once a year. First aid team members hold certificates approved by the Provincial Health Directorate and keep their knowledge and skills up to date through refresher training conducted every 3 years.

Action plans cover technical measures (machine guards, ergonomic arrangements, ventilation systems), organizational measures (working hours arrangements, job rotation, job descriptions), as well as training and awareness activities. For each plan, responsibilities and target dates are defined, and effectiveness is monitored through on-site measurements and feedback. Action plans are revised at least once a year and in the event of an occupational accident or a near-miss incident.



Occupational Health and Safety (OHS)

As part of the training activities carried out in 2024, a total of 78 employees received OHS training.



OHS Trainings and Drills

Regular training programs are implemented to enhance employees' OHS knowledge, awareness, and competencies. All employees receive basic OHS training upon onboarding. These trainings cover general rules, workplace-specific risks, emergency procedures, fire safety, ergonomics, personal protective equipment (PPE and first aid).

In workplaces classified as low risk, each employee is ensured to receive at least eight hours of OHS training every three years. Introductory training lasts at least four hours. Within the annual plan, refresher training, fire drills, and regulatory briefing sessions are organized. Accordingly, training processes also contribute to employees' preparedness for emergencies. Practical drills are conducted across various areas to maintain teams' sense of responsibility and enhance their capacity for rapid response in potential incidents. First aid teams keep their knowledge and skills up to date through refresher training every three years, and team members hold certificates approved by the Provincial Health Directorate. As part of fire training, theoretical briefings and practical drills are conducted at least once a year. Evacuation and rescue drills are conducted at least once a year, simulating emergency scenarios with the participation of all employees.

As part of the training activities carried out in 2024, a total of 78 employees received OHS training. The total duration of the training delivered throughout the year was recorded as 312 employee-hours.

In addition, employees participate in first aid training on a voluntary basis. Seven individuals who participated in the programs delivered by the First Aid Training Center and successfully passed the examinations earned the "First Aid Certificate." Certified employees also make up the BAT's first aid team. Thus, rapid and effective emergency response capability is enhanced, strengthening a safe working environment.

The onboarding training of our subcontractors and the assessment of their role suitability are monitored by the service provider. The relevant documents are reviewed by the human resources team prior to commencement of work. All training activities are documented together with participant lists, content materials, and durations, and are regularly reviewed and continuously improved.

OHS Training by Year



Occupational Health and Safety (OHS) Targets Set by the Association for 2024

- Analyzing near-miss incidents as accidents to implement necessary preventive measures;
- Increasing the total OHS training hours per employee beyond legal requirements;
- Expanding training content to include ergonomics, psychosocial risks, and emergency management;
- Conducting at least two emergency drills (fire and earthquake) annually;
- Ensuring the timely completion of employees' periodic health examinations;
- Regularly conducting environmental measurements (lighting, noise, thermal comfort).

Social Impact

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Social Impact

The BAT views projects that contribute to society as an impact area that brings together the financial sector's expertise and social benefit. With this approach, it aims to create an ecosystem where individuals can confidently participate in the financial system, make informed decisions, and have equal access to opportunities.

For the BAT, social impact activities are not only an area of social responsibility but also an integral part of sustainable development. Projects implemented with a broad stakeholder network—ranging from universities and public institutions to non-governmental organizations and member banks—aim to strengthen financial literacy, enhance accessibility, and promote

informed financial behaviors across different segments of society. Through this approach, the BAT highlights the role of finance in serving society and translates sectoral expertise into social benefit through projects that contribute to the quality of life of individuals and institutions.

Sectoral Guidance and Capacity Building

BAT assumes a guiding role in the transformation areas required by the sector while developing policies that strengthen the stability of the financial system.

As a body that shapes the financial system as a whole, supports its development, and bridges stakeholders, the BAT contributes to sustainable and inclusive development from a social benefit perspective.

The BAT's guiding role in the sector is reflected through activities carried out across complementary areas such as regulation, research, training, digitalization, risk management, and consumer rights. The **Risk Center Internal Control and Audit, Training Center, Risk Center Technology and Payment Systems, Sector Regulations, Information Systems and Digital Applications, Customer Arbitration Committee, Research and Statistics, and Sustainability and Special Projects** departments each operate within their respective areas of expertise and form the foundation of this multi-layered structure.

The BAT assumes a guiding role in the transformation areas required by the sector while developing policies that strengthen the stability of the financial system. Through the Risk Center, the BAT enhances the transparency and reliability of the financial system and

coordinates information sharing to ensure the sound conduct of banking transactions.

- **Risk Center Department:** Implements the relevant legislation and provides various reports and services for its members and natural and legal persons. Holds meetings with its members, the Risk Center Management, and public and private institutions and organizations; publishes statistical reports for members and the public. Monitors regulations relevant to its area of responsibility and carries out the necessary implementations. Represents the Banks Association of Türkiye on matters related to its areas of activity. Natural persons can obtain Risk Center reports containing information on credit limits and debts, checks, promissory notes, individual loan applications, public procurement bans, and decisions on check prohibitions and removals via the e-Government portal (www.turkiye.gov.tr) or the e-Government mobile application, free of charge, up to one per day, four per month, and a maximum of 24 per calendar year.

- **Technology and Payment Systems Department:** Monitors developments in banking and financial technologies at both international and national levels and carries out short- to medium-term projects. Coordinates the activities of the Fictitious Transactions Committee. Monitors regulations and practices related to payment systems, formulates the BAT's views on changes, and communicates them to the relevant institutions. Coordinates activities with members and relevant institutions and represents the BAT on matters within its scope of work. Plays a role in the development of the sector by considering benefits to both the sector and society, and carries out awareness-raising activities. (For example, enhancing accessibility in the banking sector for persons with disabilities and older adults, and sharing

information on digital applications, etc.)

- **Information Systems and Digital Applications Department:** Establishes and operates information systems, provides user and programming support, and coordinates related activities. Identifies and procures the required hardware, software, and related products and services. Takes measures to ensure information security. Ensures that incoming and internal Association documents are recorded in the Document Management System, and that outgoing documents are sent and archived. Represents the BAT on matters within its scope of work. The Information Systems and Digital Applications Department, together with Technology and Payment Systems Department, ensure that the digitalization process is disseminated across the Association and the sector in a secure, efficient, and inclusive manner. The Information Systems and Digital Applications Department manages information security and IT infrastructure, while the Technology and Payment Systems Department provides guidance on the integration of new financial technologies.

- **Sector Regulations Department:** By monitoring national and international sectoral developments and financial regulations, it conducts analyses to support regulatory compliance and ensures coordination with relevant institutions and organizations by formulating the BAT's views on regulatory changes.

- **Professional Development and Training Department:** Plans and organizes classroom training, seminars, and conferences aimed at the development of the banking profession. Produces distance learning content such as e-learning modules, training videos, e-guides, and webinars, and offers this content to its stakeholders through digital platforms. Prepares content aimed at improving the public's level of financial literacy and carries out training activities

that contribute to the professional development of employees in the banking sector.

- **Corporate Communication Department:** Supports the development of the Association's communication strategies and ensures their implementation. Manages relations with national and international stakeholders and the press; plans and maintains communications via the website, digital channels, and social media platforms to ensure that the Association's activities are accessible to the public. Makes announcements through various communication channels to inform the public about the Association's activities. Also raises awareness through financial literacy competitions organized for students and carries out initiatives that strengthen engagement with community stakeholders.

- **Customer Arbitration Committee Department:** By evaluating individual customer applications submitted to the Association, it strengthens compliance with ethical principles and fair practices in banking, and contributes to reinforcing transparency and trust in the sector by coordinating the activities of the Individual Customer Arbitration Committee and the Ethics Commission.

- **Research and Statistics Department:** Monitors and evaluates national and international economic, banking, and financial sector developments within a cause-and-effect framework; tracks relevant regulations, conducts impact analyses, and formulates the BAT's views. Conducts sector-related research, regularly monitors the banking sector and macroeconomic indicators, and periodically collects, updates, and reports statistical data. Responds to the sector's information requests, coordinates activities with relevant boards, prepares sector-focused publications, and represents the BAT on matters within its scope of work.

Sectoral Guidance and Capacity Building

In 2024, a total of 8,370 participants attended the online trainings organized by the Training Center. Participants consist of 76% from member banks and 24% from other institutions and organizations.

- Sustainability and Special Projects Department:** Aims to provide support to strengthen the implementation processes of member banks in areas such as Sustainable Finance, Environmental and Social Governance, and Climate-Related Financial Risks. Formulates views in consultation with members to safeguard the rights and interests of the sector. Provides support for the establishment of working groups in this area and the delivery of outputs.

With this holistic structure, the BAT functions as a knowledge-based guidance center not only for its members but for all stakeholders in the financial system. The Association's guidance contributes to building a shared understanding in the sector's strategic decisions, accelerating capacity development, and strengthening the financial system for the benefit of society.

Training Center and Capacity Building Initiatives

The BAT Training Center operates to ensure the continuity of knowledge in the financial sector, support professional development, and accelerate sectoral transformation. The Training Center continuously updates its content in line with rapid digitalization, sustainability-focused new business models, and the evolving regulatory landscape, guiding the development of banking professionals and stakeholder institutions. The activities carried out by the Training Center are among the most important capacity-building tools supporting the knowledge-based development of the financial system. The additional activities carried out are also among the most important capacity-building tools supporting the knowledge-based development of the financial system. In this context, online trainings offer participants interactive learning under instructor guidance, while digital training modules support a self-paced learning experience independent of time and location. Thus, BAT ensures the sustainable dissemination of sectoral knowledge sharing across both live and digital environments.

Online Training Activities

In 2024, online training activities were planned in three terms (January–March, April–June, August–December), and a total of 455 online trainings were delivered throughout the year, including 61 new sessions. Training programs are diversified to cover not only technical and professional areas but also social, behavioral, and managerial competencies. In addition to content focused on professional development, digital transformation, risk management, sustainable finance, regulatory compliance, and technology-driven banking practices, comprehensive training is also provided in behavioral and managerial competency areas such

as communication, teamwork, customer sensitivity, analytical thinking, creativity, leadership, change management, and strategic vision development. Training programs aim to enhance employees' technical knowledge levels as well as their capacity to adapt to the future competencies of banking, thereby contributing to the strengthening of the sector's multi-skilled human capital.

According to 2024 data, demand for and participation in online trainings reflect the strong momentum of the sector's learning culture:



Term	Number of Applications	Total Number of Participants	Members	Non-Member Institutions
January–March 2024	4,650	3,667	2,708	959
April–June 2024	3,298	2,769	2,152	617
September–December 2024	2,105	1,934	1,467	467
Total	10,053	8,370	6,327	2,043

Sectoral Guidance and Capacity Building

In 2024, the overall satisfaction rate for digital trainings increased to 80%.



Digital Training and Learning Platform

Digital trainings delivered through the Finance and Banking Training Portal (egitimimportali.tbb.org.tr) have achieved a high level of satisfaction in terms of accessibility, content diversity, and user experience.

In 2024, the digital learning platform made access to knowledge in the banking sector more inclusive. A total of 63 digital training modules offered through the portal were actively used by 12,796 users, with the content viewed 19,410 times. These indicators demonstrate the scalable impact achieved in the digitalization of financial training.

According to the annual evaluations conducted by the Banks Association of Türkiye among its stakeholders, the overall satisfaction rate for "Digital Trainings," measured at 79% in 2023, increased to 80% in 2024. During the same period, the satisfaction rate for "Virtual Classroom Trainings," which was 80% in 2023, reached 85% in 2024. Training and instructor satisfaction is assessed on a 10-point scale and was recorded at 9.7 in 2024.

The BAT Training Center approaches sectoral learning processes as an integral part of a culture of continuous improvement and resilience. With its digital infrastructure, expert instructor pool, and data-driven monitoring system, it continues to strengthen the finance sector's human capital capacity.

International Information Sharing

The BAT continues to pursue its sectoral capacity-building vision at the international level.

In 2024, training programs were delivered on risk management, sustainability reporting, and artificial

intelligence through initiatives conducted in collaboration with banking associations in Uzbekistan, Palestine, Azerbaijan, and Northern Cyprus.

- Training on "Risk Management and IFRS" was conducted in Tashkent for the Banking Association of Uzbekistan from April 16 to 19, 2024.
- Online training sessions on "Machine Learning" and "Sustainability Reporting" were delivered for the Palestine Banking Institute.
- A total of 72 participants from the Azerbaijan Banks Association took part in programs offered in the BAT training catalogue throughout the year.
- The training collaboration with the Banks Association of Northern Cyprus, ongoing since 2008, continued in 2024 through a virtual classroom format.

Regional and Global Interaction

The BAT's guiding role is not limited to training and regulatory domains; it also extends to platforms for information exchange and dialogue at the regional and global levels. In 2024, mutual visits, information-sharing sessions, and cooperation meetings were held with organizations including the Association of Banks of Tajikistan, the Central Bank of Sri Lanka, the Egyptian Banking Institute, and the Union of Arab Banks.

The Türkiye Sustainable Finance Forum, hosted by the BAT, was held with the participation of senior representatives from national and international financial institutions, and the BAT also actively participated in global-scale events such as the International Arab Banking Summit. Through these events, Türkiye's accumulated expertise in the financial sector was shared at the international level, contributing to the strengthening of sectoral resilience.

Projects Carried Out for the Benefit of Society

Throughout 2024, BAT provided 1,500 students with the opportunity to gain first-hand insight into the world of finance through university meetings.

The BAT acts as a responsible corporate citizen, enhancing the reliability, inclusiveness, and resilience of the financial system while contributing to the strengthening of social welfare. The Association aims to transform financial knowledge into social benefit through projects that reach diverse segments of society. Accordingly, activities designed in alignment with the Sustainable Development Goals (SDGs) create a broad impact area, ranging from education and accessibility to financial security and the professional development of youth. From this perspective, the BAT prioritizes information sharing, accessibility, equal opportunity, and social inclusion, strengthening the role of finance in serving society. Through collaborations with universities, public institutions, civil society organizations, and member banks, it contributes to enhancing financial literacy, strengthening social awareness, and enabling individuals to engage more effectively in the financial system.

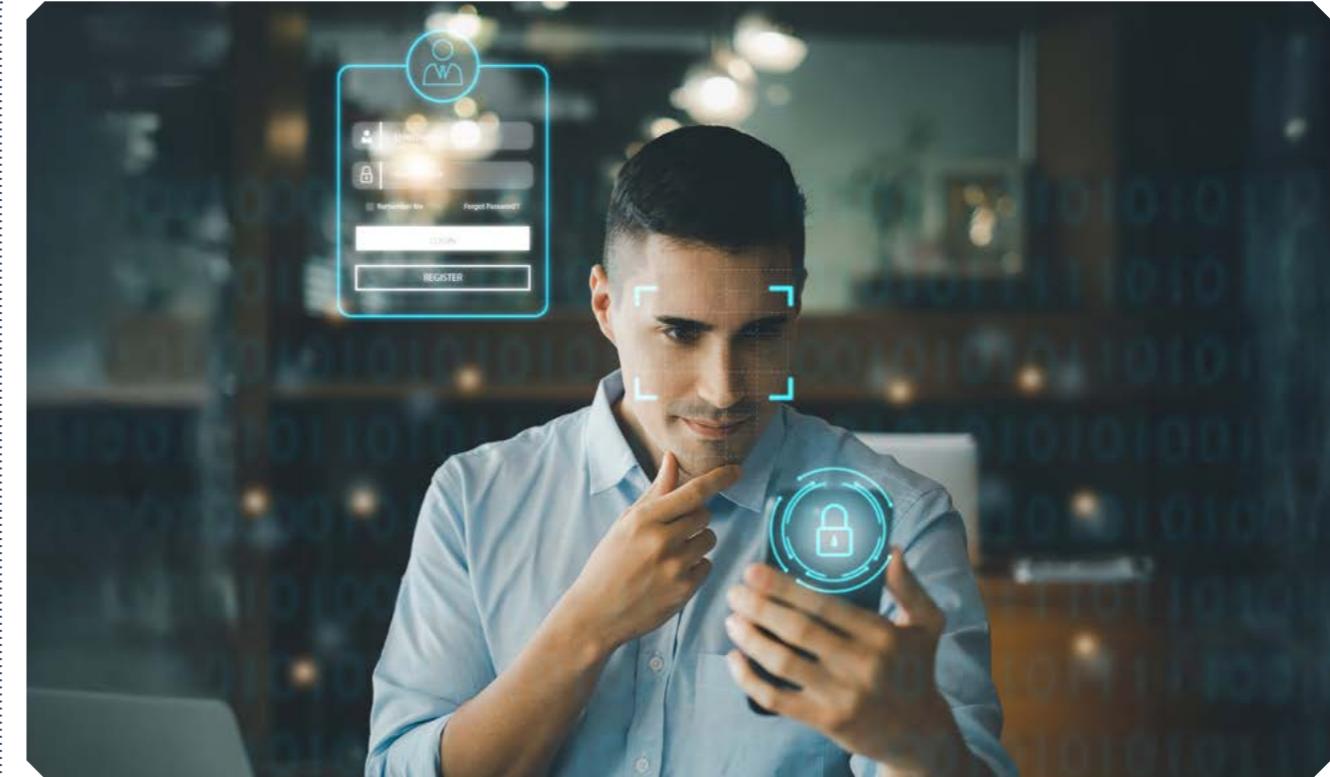
Activities for University Students

The BAT carries out various activities in close collaboration with universities to raise young people's awareness of the financial sector and to contribute to the development of a qualified talent pool for the sector. Within this scope, the programs

organized enable students to gain first-hand insight into the banking sector, shape their career plans, and understand areas of transformation across the financial ecosystem.

Throughout 2024, approximately 500 students from 9 universities across Türkiye were engaged through in-person meetings. By visiting the Banks Association of Türkiye, students gained insight into the Association's activities and the structure of the banking sector, and had the opportunity for one-on-one interaction with experts on current sector practices. In addition, seminars held at various universities throughout the year provided information on the functioning of the financial system and career opportunities within the sector.

The "Career Days in Banking Conference," organized online on November 20–21, 2024 under the coordination of the BAT Training Center and the Professional Development Department, was one of the standout events of 2024. Approximately 1,000 students from 108 universities across 67 cities in Türkiye attended the two-day conference, meeting with leading human resources professionals from the banking sector. At the event, banks' recruitment processes, talent management, career development, and emerging competency requirements in the sector were addressed, with students gaining up-to-date



insights by directing their questions directly to bank representatives.

Anti-Fraud and Awareness-Raising Initiatives

The BAT conducts awareness-raising initiatives in the areas of fraud and cybersecurity to strengthen society's financial security awareness. Regular informational content on types of fraud, methods of protection against fraud, and secure transaction

practices was shared through social media and digital platforms.

In addition, the "Social Engineering Fraud Prevention Workshop" was organized, with awareness-raising activities conducted for bank employees and sector stakeholders. These efforts enhanced digital security awareness and contributed to fostering a culture of security in financial transactions.

Projects Carried Out for the Benefit of Society

A total of 40 bank representatives and 35 civil society organizations participated in the Accessibility Workshop in the Banking Sector.



Financial Access for Individuals with Disabilities

Within the framework of the principle of financial inclusion, the Association leads efforts to facilitate access to financial services for individuals with disabilities. Within this scope, contributions are made to various projects through the "Working Group on Banking Services for Persons with Disabilities." The working group aims to accelerate the sectoral integration of persons with disabilities, support their professional development, and expand career opportunities within the banking sector. In addition, awareness-raising initiatives are carried out to facilitate access to financial services for persons with disabilities. Training materials and awareness videos prepared through the Professional Development and Training Department provide content aimed not only at banking employees but also at customers with disabilities. Thus, the aim is to reduce barriers to accessing financial services and to develop inclusive solutions for all.

The training content is accessible via the [BAT Finance and Banking Training Portal](#).

Moreover, the "Accessibility in the Banking Sector Workshop," organized in collaboration with the Ministry of Family and Social Services and the Banking Regulation and Supervision Agency (BDDK), made a significant contribution to raising awareness of access to financial services for persons with disabilities. The workshop brought together 40 bank representatives and 35 non-governmental organizations (NGOs) representing different disability groups, fostering a strong dialogue on inclusive finance among the public sector, the private sector, and civil society.

At the event, good practice examples on accessible financial services were shared during the panel titled "Banking for Everyone: New Approaches, Opportunities, and Solutions in Accessibility," and the sector's current state and areas for development were assessed.

Within this scope, the "Banking Services for Persons with Disabilities Report" was published as a guiding reference for the sector in the field of accessibility. The report and workshop outcomes contributed to the wider adoption of inclusive services by establishing a shared awareness framework for all stakeholders in the banking sector.

Sports Activities

The BAT supports various sports activities to strengthen solidarity among employees and to reinforce social bonds among professionals in the financial sector.

Within this scope, the "Bankers Tennis Tournament," organized in 2024 in collaboration with TED Sports Club, was held with broad participation from the sector and served as a platform fostering social interaction.

Social Support and Solidarity Campaigns

The BAT continues to strengthen a culture of solidarity through financial support and social assistance campaigns targeting disadvantaged groups. Through initiatives carried out with member banks and stakeholder institutions, support is provided to communities in need, strengthening the social dimension of financial inclusion.

Financial Inclusion and Financial Literacy

The Association views the widespread dissemination of financial knowledge, skills, and awareness across society as a prerequisite for sustainable development.

Financial inclusion is addressed as a key component of the BAT's vision for social development. The Association views the widespread dissemination of financial knowledge, skills, and awareness across society as a prerequisite for sustainable development. Accordingly, these activities aim to enable individuals to make more informed decisions in financial transactions and to enhance their knowledge of savings, investment, and debt management.

Financial literacy initiatives aim both to equip individuals with foundational knowledge and to strengthen the transparency and reliability of the financial system. Within this framework, the trainings offered by the BAT aim to enhance individuals' knowledge and awareness in areas such as budgeting, expenditure management, saving, identifying financial risks, and the secure use of digital banking services. Activities in the field of financial literacy are supported by digital access opportunities. Open-access digital

content is provided through the **BAT Financial Literacy Platform** (foy.tbb.org.tr) and the BAT Training Portal (egitimimportali.tbb.org.tr). With a view to consolidating these two platforms under a single framework, work began in 2024, and the new portal hosted at egitim.tbb.org.tr is planned to become operational in 2025.

Financial Literacy Trainings

The **Financial Literacy Trainings** developed by the BAT are offered free of charge and open to all, reaching broad segments of society—from young people to entrepreneurs, and from individuals aged 55 and over to diverse target groups seeking to enhance their financial knowledge. New modules are added through annually updated training catalogues, and digital access opportunities enable individuals across Türkiye to access financial knowledge regardless of age, profession, or income level. Through this comprehensive access network, thousands of individuals are supported in improving their financial behaviors and attitudes, contributing to greater inclusivity in access to financial services, stronger individual financial security, and the reinforcement of long-term economic stability.

In 2024, digital training content aimed at enhancing financial consumers' decision-making and monitoring skills was diversified. The digital training titled "Financial Literacy from a New Entrepreneurship Perspective" enhanced the knowledge levels of individuals seeking to join the entrepreneurship ecosystem who felt insufficiently familiar with basic financial concepts. In addition, the "Digital Banking Applications Training Video Series," prepared to raise awareness of the secure use of digital banking

channels, contributed to the promotion of digital literacy.

Through the "Step-by-Step Guide to Financial Success" training designed specifically for young people, individuals aged 15–17 strengthened their understanding of basic financial concepts and were raised awareness of measures to prevent fraud attempts.

The BAT's approach to financial inclusion is not limited to enhancing individual awareness; it also encompasses strengthening the financial resilience of micro enterprises and entrepreneurs. Within this scope, the "Financing Resources Training Video Series for Micro Enterprises and Entrepreneurs" was developed, consisting of a total of 30 short videos structured under five main themes. The training series provides information across a broad spectrum,

ranging from the business start-up process and brand development to social media marketing and e-commerce.

Community Engagement and International Events

The Association encourages children to develop an interest in financial matters at an early age and places importance on nurturing them as financially informed individuals. With this approach, the Association organizes the Financial Literacy Competition each year for students aged 13–15 and encourages young participants to build on their national-level experience by engaging in European-level platforms. The online competition held nationwide aims to enhance participants' knowledge of financial matters, develop informed financial decision-making skills, and raise awareness in this field.



Environmental Responsibility

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Environmental Management

In 2024, environmental training on ISO 14001 and ISO 14064 was delivered with the participation of all employees.



In line with the Paris Agreement's goal of limiting global temperature rise to 1.5°C, the financial sector bears a significant responsibility in climate action. Türkiye's accession to the Paris Agreement in November 2021 and the announcement of a net-zero emissions target for 2053 have further strengthened the place of environmental sustainability on the national agenda. In line with these developments, steps are being taken to reduce the environmental impact of activities and to improve the efficiency of resource use.

The reduction of greenhouse gas emissions, the enhancement of energy efficiency, and the adoption of circular economy practices are among the core priorities of the environmental management system. The carbon footprint is monitored on a regular basis, with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) taken as a reference, and guidance drawn from national and international initiatives such as the United Nations Environment Programme Finance Initiative (UNEP FI).

Through these efforts, the aim is not only to reduce environmental impact but also to contribute to the transformation of the financial sector. Within this context, performance indicators across key impact areas—such as waste generation, water and energy consumption, and greenhouse gas emissions—are monitored on a regular basis, with the resulting data evaluated through a continuous improvement approach.

The environmental management system is continuously improved to reduce environmental impacts, ensure efficient use of resources, and promote sustainable business practices. Through the implementation of the ISO 14001 Environmental Management System and the ISO 14064 Greenhouse Gas Emissions Standard, environmental performance is monitored, with the aim of ensuring access to reliable data for strategic decision-making processes.

In 2024, environmental training on ISO 14001 and ISO 14064 was delivered with the participation of all employees, and informative presentations on environmental topics such as waste management, greenhouse gas emissions, and paper consumption were provided during the BizBize meetings held regularly throughout the year.

Within the framework of its environmental approach, the BAT aims to:

- integrate an Environmental Management System into our processes to enable continuous monitoring of environmental performance;
- monitor all environmental legislation and continue operating in line with stakeholder expectations;
- achieve continuous improvement through innovative and digital approaches;
- ensure the sustainable use of natural resources and reduce environmental pollution arising from our activities in line with our environmental objectives; minimize waste generation through effective waste management and ensure the reuse and recycling of waste;
- enhance the environmental awareness and consciousness of our employees and stakeholders.
- The BAT's environmental policy is available via this [link](#).

Emission and Energy Management

In 2024, total emissions amounted to 186.80 tCO₂e.



The Banks Association of Türkiye is aware of its responsibilities in climate action in line with Türkiye's net zero emissions target for 2053. Contribution is made to enhancing the sector's knowledge base. At the same time, the environmental impacts arising from its activities are closely monitored. Greenhouse gas emissions are calculated on an annual basis and verified by independent third parties to ensure transparency and reliability.

Greenhouse gas (GHG) emissions are monitored in accordance with the ISO 14064-1 standard under three categories: direct emissions (Scope 1), indirect emissions from electricity consumption (Scope 2), and other indirect emissions (Scope 3). The most up-to-date national and international emission factors (IPCC, DEFRA, IEA, etc.) are used in the calculations. As in 2023, the verification of 2024 emission data was carried out by the independent verification body Türk Loydu in accordance with the ISO 14064-3 standard.

In 2024, total emissions amounted to 186.80 tCO₂e. Of this total, 35% is attributable to direct energy use (natural gas, fuel), 25% to electricity consumption, and 40% to other indirect activities such as paper consumption, water use, waste management, and travel.

Direct emissions consist of natural gas consumption, vehicle fuels, and fluorinated gases in fire extinguishers, while indirect emissions arise from electricity consumption as well as purchases related to transportation, hotel accommodation, drinking water, and paper. In determining emission factors, Türkiye Electricity Generation Emission Factors, the

DEFRA 2025 Advanced Set, and relevant literature sources were referenced.

During the 2023–2024 period, all fan coil units throughout the building were equipped with

Greenhouse Gas Emissions (tCO₂e)

	2023	2024
Scope 1 – Direct Emissions	44.35	64.70
Scope 2 – Indirect Emissions	45.51	46.80
Scope 3 – Other Indirect Emissions	46.76	75.29
Total	136.62	186.80

Energy Consumption (MWh)

	2022	2023	2024
Electricity	96,72	95,01	97,90
Natural gas	52,11	53,30	51,90
Total	148,83	148,31	149,80

timer relays. Through this initiative, the units are automatically switched off outside working hours, preventing unnecessary energy consumption and enhancing efficiency.

Water Management

In 2024, water withdrawal decreased by 9% compared to the previous year, amounting to 812.94 m³.

Various initiatives are being implemented to ensure the efficient use and sustainable management of water in operations. Water withdrawal arises solely from office activities, with no industrial water use. Within this framework, water needs are largely met through the municipal water supply and drinking water procurement.

In 2024, total water withdrawal amounted to 812.94 m³. Of this total, 780.86 m³ was supplied from the municipal water supply, and 32.08 m³ was obtained from third-party sources (drinking water procurement). Although seasonal fluctuations were observed compared to 2022 and 2023, water withdrawal was reduced by 9% in 2024 compared to the previous year through the measures taken.

Water Withdrawal by Source (m ³)	2022	2023	2024
Municipal Water Supply	683.71	866.85	780.86
Procured Drinking Water	31.76	28.80	32.08
Total	715.47	895.65	812.94

Discharged Water (m ³)	2022	2023	2024
Discharged water ⁴	643.92	806.09	731.64

⁴ Not based on direct measurement; calculated in accordance with the Wastewater Treatment Plant Design Guidelines.

Wastewater Management

Since water use arises solely from office operations, the amount of wastewater generated is calculated in accordance with the Wastewater Treatment Plant Design Guidelines. As stated in the Guidelines, the amounts of water discharged by the Banks Association of Türkiye have been calculated on an annual basis, based on the assumption that 90% (75%–95%) of total water consumed reaches the sewerage system and is converted into wastewater. In 2024, the amount of discharged water decreased by approximately 9% compared to the previous year, amounting to 731.64 m³.

Water Efficiency Initiatives

Low-flow aerators and sensor-activated faucet systems are used in our offices to reduce water consumption. To prevent water losses, valves are checked daily and water consumption data are regularly monitored. In addition, content on water efficiency practices has been included in our institutional training programs to raise employee awareness.

Water Consumption by Year (m³)



Waste Management

In 2024, a total of 297.73 kg of waste was sent for recycling under the zero waste management system.



Waste management at the BAT is regarded as an integral part of environmental responsibility, with processes carried out in accordance with both applicable legislation and best practices. Various initiatives are implemented to reduce waste generation at source, increase recovery rates, and integrate circular economy principles into business practices.

Waste Reduction and Circular Economy Approach

In office operations, glass and porcelain plates, cups, and metal cutlery are used instead of single-use plastic products. To reduce the consumption of plastic carboys, a glass carboy system has been adopted, and glass bottles are preferred in meetings.

Digital solutions are developed to reduce paper consumption. Through the use of electronic signature applications, tablets, and digital document management systems, both paper waste is prevented and processes are streamlined. Sensor-based systems and timers optimized in line with working hours are used in lighting to prevent unnecessary energy consumption.

The environmental management system is continuously improved. Efforts are underway to integrate ISO 14001 practices into processes. In 2023 and 2024, awareness-raising training on waste management and environmental issues was provided to all employees. In addition, environmental topics such as waste reduction and recycling are regularly addressed at the monthly "Bizbize" meetings.

Waste generated at the BAT is generally office-based and is classified as non-hazardous and hazardous waste:

- **Non-hazardous waste:** Paper, cardboard, plastic, glass, and metal waste
- **Hazardous waste:** Waste batteries and accumulators, electronic equipment (e.g., modems, servers, cartridges, laptops, refrigerators)

The sorting, collection, and disposal of waste are carried out in cooperation with Akmerkez, which holds a Zero Waste Certificate. Electronic devices that have reached the end of their useful life are sent to authorized entities. Devices that can be repaired are donated to schools in need.

In 2024, a total of 297.73 kg of waste was sent for recycling under the zero waste management system. No waste is sent for disposal; all waste is sent for recycling. Half of this waste consists of hazardous waste, while the other half is non-hazardous. Recovered waste included end-of-life electronic equipment (e.g., refrigerators and modems), as well

as other devices recycled through authorized, licensed recovery organizations.

Electronic Waste Management

The management of electronic waste is carried out meticulously to reduce environmental impacts and ensure more efficient use of resources. Computers that are no longer in use are repaired and donated to high schools, while devices that cannot be repaired are directed to authorized, licensed organizations. Under agreements with brands, devices are sent directly to manufacturers; in other cases, cooperation is carried out with authorized, licensed recovery organizations.

Measurement and Monitoring Approach

Waste data is collected using a direct measurement methodology. In 2023, the measurement methodology was improved to obtain more reliable and comparable data. No estimation- or assumption-based approaches are used in the calculation of waste quantities.

Recovered Waste (kg)	2023	2024
Recovered non-hazardous waste	195.22	148.73
Recovered hazardous waste	28.25	149
Total	223.47	297.73

Digital Transformation

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Digital Transformation

BAT views digital transformation as a process that goes beyond the modernization of technological infrastructure to transform business practices and enhance service quality.

The acceleration of digital transformation in the finance sector also serves as a strategic driver for the BAT. As of September 2024, the number of active digital banking customers reaching 117 million⁵ clearly demonstrates the scale of transformation in the sector. These developments have driven the BAT to digitalize its products and services, redesign its business processes, and strengthen its efforts in the field of information security. Accordingly, the BAT considers digital transformation as a process that goes beyond the modernization of technological infrastructure to transform business practices and enhance service quality. Efficiency, environmental impact, and information security are addressed in an integrated manner, with initiatives pursued from a long-term perspective beyond short-term gains.

Different departments at the BAT are tasked with ensuring that digital transformation within the

banking sector and the Association is implemented efficiently and delivers benefits to all stakeholders. The Information Systems and Digital Applications Department establishes and operates the Association's IT infrastructure, ensuring the uninterrupted continuity of business processes by procuring the required software and hardware. At the same time, it conducts document management and archiving activities in digital environments and implements measures to ensure information security. The Technology and Payment Systems Department monitors developments in banking technologies and payment systems at both national and international levels and implements short- and medium-term projects for the Association and the sector. In addition, it ensures coordination for the digitalization of banking services and supports effective information flow among relevant stakeholders. Through this integrated structure, digitalization not only

enhances speed and efficiency within the Association but also creates a common ground that contributes to the transformation of the banking sector.

Considering that its activities do not fall within the core duties of the Central Bank of the Republic of Türkiye and the significant share of the banking sector in the financial system, the Risk Center was transferred to the Banks Association of Türkiye under Law No. 6111 dated February 13, 2011. Since 2013, operating on a digital infrastructure, the Risk Center has expanded from four services transferred from the Central Bank of the Republic of Türkiye (CBRT) to offering 118 different digital products and services today. The Risk Center continuously enriches its data and supports new products and services with information technologies, contributing to members' ability to carry out accurate and sound risk management.

⁵ The Banks Association of Türkiye (2024). Digital, Internet, and Mobile Banking Statistics – September 2024. Access link: <https://www.tbb.org.tr/sites/default/files/raporlar/51410/ekler/Dijital->

Digitalization Processes

In 2024, BAT continued to migrate its internal business processes to the digital environment.

At the BAT, digitalization is regarded as an area that transforms ways of working, reduces resource usage, and enhances service quality. In 2024, the BAT continued to migrate its internal business processes to the digital environment. Thanks to electronic signature applications, many processes are now carried out without the need for paper; training center contracts, surveys, and arbitration committee applications



have been digitalized, ensuring resource savings. Customer Arbitration Committees have been receiving applications digitally via the e-Government Portal since 2016. With the new project to be launched in 2025, arbitration committee decisions will also be approved via electronic signature, aiming to fully transfer the processes to the digital environment. Moreover, as part of the digitalization of operations to strengthen the data infrastructure and automate processes, the BAT is implementing practices such as e-invoicing, the Document Management System (DMS) in electronic form, digital training programs and training certificates, and digital magazines, books, and similar publications. Conducting meetings and training sessions via online platforms eliminates the need for transportation, thereby contributing to the reduction of carbon emissions associated with the BAT's activities.

The BizBize intranet platform facilitates employees' access to information, strengthening access to internal knowledge and enabling the rapid resolution of issues. In addition, the Helpdesk application is planned to be implemented in 2025. Throughout 2024, preparation and development activities were carried out for the implementation of the application. Once the system is put into operation, support tickets will be recorded and traceability will be enhanced.

In 2024, the Archer GRC product began to be used by the Risk Center Internal Audit and Internal Control Department for internal reporting and riskmanagement, while the Vertica program was implemented for the storage and analysis of audit logs. In the last month of 2024, the Risk Center Audit Tracking System (RMDS) was implemented for use in internal reporting and the tracking of findings. Through this system, the monitoring of audits and controls, the reconciliation of findings, and final report processes

are carried out in the digital environment. Moreover, the BAT has conducted research on the use of artificial intelligence in its business processes, particularly assessing potential application opportunities in the fields of data analytics and process automation.

Digitalization practices are expected to contribute to more efficient use of resources and a reduction in waste generation in the coming period. Customer Arbitration Committees have been accepting digital applications via the e-Government Portal since 2016. Within this scope, it is planned to reduce unnecessary outputs and processing by preventing erroneous applications submitted to the Customer Arbitration Committees.

Equipment that is out of service but repairable is restored for reuse through grant programs after undergoing the necessary maintenance and repair processes. In addition, awareness announcements issued at year-end have supported employees in properly disposing of their electronic waste. Moreover, it is planned to increase energy efficiency and minimize maintenance- and hardware-related waste by migrating the servers to the Kredi Kayıt Bürosu (KKB) infrastructure and transitioning to high-capacity cloud systems. In addition, the continuity of sectoral information sharing in the digital environment is ensured through working group notifications carried out via the portal by the Technology and Payment Systems Department.

With the implementation of all these steps, digitalization processes are expected to generate tangible gains in terms of both operational efficiency and environmental sustainability, including waste reduction, energy efficiency, lower emissions, and reduced paper consumption.

Activities for the Banking Sector

The BAT not only digitalizes its internal processes but also enhances the sharing of knowledge and experience across the sector. Through the web services developed for banks, the documents sent by the BAT can be directly integrated into banks' own systems, and audit and reporting documents are shared in the digital environment. In addition, training programs are organized on topics such as digital banking, crypto assets, artificial intelligence applications, mobile payments, and open banking.

In the training programs organized in 2024, a total of 823 participants attended, and a 114-hour training program was delivered. Training programs under the Digital Transformation heading focus on artificial intelligence and data analytics applications, blockchain and digital asset-based financial technologies, as well as digital banking and user experience. Within this scope, the programs titled "Artificial Intelligence, Data Analytics, and Artificial Intelligence Applications in Banking" and "Credit Risk and Artificial Intelligence Model Applications Training" were among the most heavily attended programs. These initiatives both support the sector's digitalization journey and contribute to the safe and effective use of financial technologies.

In addition, the seminar application processes of the Training Center have been digitized via the Document Management System (DMS) by the Information Systems and Digital Applications Department, ensuring the automatic transfer of training records to the Training Application System. Moreover, the BAT's website (www.tbb.org.tr) has been renewed, and the automatic transfer of applications submitted via banks' web services to the training system has been implemented.

Data Security and Cyber Resilience

In 2024, a 14-hour “Cybersecurity and Ethical Hacking” training was delivered.

In 2024, data security and cyber resilience at the BAT were addressed as an integral part of technological transformation processes. The secure operation of the digital infrastructure requires not only the protection of internal information assets but also the maintenance of the trust environment needed by the banking sector. The activities carried out in this context aim both to ensure security in the BAT's own operational processes and to contribute to the shared cybersecurity capacity of sector actors. The activities have been structured around early threat detection, the reduction of operational risks, strengthening employee awareness, and supporting business continuity.

In 2024, information security policies continued to be implemented, and audits of the Risk Center and the

Document Management System were conducted within this scope. System logs were analyzed via the IBM QRadar SIEM platform to enable early detection of suspicious activities, while AI-based solutions ensured more effective monitoring against threats. The analysis of data obtained from the Association's systems using artificial intelligence has contributed to the early detection of issues and increased operational efficiency.

Information security announcements and phishing examples were regularly shared to enhance employee awareness. All Risk Center employees received information security awareness training.

The training sessions were conducted by the Risk

Center Internal Audit and Internal Control Department. In addition, further awareness training was organized for Risk Center employees, and two phishing simulations were conducted in 2024. In 2024, a 14-hour “Cybersecurity and Ethical Hacking” training was delivered. These processes aim to reduce risks that may arise from human resources.

In relationships with suppliers and subcontractors, security standards were observed, regular information security surveys were conducted, and security provisions were incorporated into contracts. Hardware and software suppliers, as well as support organizations such as Kredi Kayıt Bürosu, were also evaluated within this scope. No information security incidents were experienced throughout 2024.

Activities for the Banking Sector

In 2024, the BAT also carried out various cybersecurity activities in collaboration with stakeholders in the banking and finance sector. Fraud analyses were conducted, and assessments on sector-wide protection methods and risks were shared. As part of the efforts carried out under the coordination of the Cyber Incident Response Team, various training programs were organized for members and the public, and the relevant content was made accessible via the BAT's [Security](#) webpage.

The activities carried out have contributed to strengthening data security and cyber resilience in the BAT's own operations, while also supporting the development of a shared security culture across the sector. The tests, training, collaborations, and technological improvements carried out throughout 2024 enabled earlier detection of risks and ensured the secure execution of processes.



Appendices

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Member Banks

- Türkiye Cumhuriyeti Ziraat Bankası A.Ş.
- Türkiye Halk Bankası A.Ş.
- Türkiye Vakıflar Bankası T.A.O.
- Ziraat Dinamik Banka A.Ş. (digital bank)
- Akbank T.A.Ş.
- Anadolubank A.Ş.
- Colendi Bank A.Ş. (digital bank)
- Fibabanka A.Ş.
- FUPS Bank A.Ş. (digital bank)
- Şekerbank T.A.Ş.
- Turkish Bank A.Ş.
- Türk Ekonomi Bankası A.Ş.
- Türk Ticaret Bankası A.Ş.
- Türkiye İş Bankası A.Ş.
- Yapı ve Kredi Bankası A.Ş.
- Birleşik Fon Bankası A.Ş.
- Alternatifbank A.Ş.
- Arap Türk Bankası A.Ş.
- Bank Mellat
- Bank of China Turkey A.Ş.
- Burgan Bank A.Ş.
- Citibank A.Ş.
- Denizbank A.Ş.
- Deutsche Bank A.Ş.
- Enpara Bank A.Ş.
- Habib Bank Limited
- HSBC Bank A.Ş.
- ICBC Turkey Bank A.Ş.
- ING Bank A.Ş.
- Intesa Sanpaolo S.p.A.
- JPMorgan Chase Bank N.A.
- MUFG Bank Turkey A.Ş.

- Odea Bank A.Ş.
- QNB Bank A.Ş.
- Rabobank A.Ş.
- Société Générale (SA)
- Turkland Bank A.Ş.
- Türkiye Garanti Bankası A.Ş.
- Aytemiz Yatırım Bankası A.Ş.
- Aktif Yatırım Bankası A.Ş.
- Bank of America Yatırım Bank A.Ş.
- BankPozitif Kredi ve Kalkınma Bankası A.Ş.
- D Yatırım Bankası A.Ş.
- Destek Yatırım Bankası A.Ş.
- Diler Yatırım Bankası A.Ş.
- Golden Global Yatırım Bankası A.Ş.
- GSD Yatırım Bankası A.Ş.
- Hedef Yatırım Bankası A.Ş.
- İller Bankası A.Ş.
- İstanbul Takas ve Saklama Bankası A.Ş.
- Misyon Yatırım Bankası A.Ş.
- Nurol Yatırım Bankası A.Ş.
- Pasha Yatırım Bankası A.Ş.
- Q Yatırım Bankası Türk A.Ş.
- Standard Chartered Yatırım Bankası Türk A.Ş.
- Tera Yatırım Bankası A.Ş.
- Türk Eximbank
- Türkiye Kalkınma ve Yatırım Bankası A.Ş.
- Türkiye Sınai Kalkınma Bankası A.Ş.

The list of member banks reflects the current status as of 2025.

Corporate Memberships

Organizations Founded by BAT

- Council of Banks Associations of Turkic States
- Economic Development Foundation
- Foreign Economic Relations Board (DEİK)
- Interbalkan Forum of Banking Association

Organizations of Which BAT is a Member

- İstanbul Development Agency of the Republic of Türkiye
- Financial Sector Commission
- TOBB Türkiye Banking and Finance Assembly
- International Chamber of Commerce (ICC)
- Quality Association (Kalder)
- Institute of International Finance
- European Banking Federation
- Asian Bankers Federation
- European Bank Training Network

Performance Indicators

Environmental Performance Indicators

Greenhouse Gas Emissions (tCO ₂ e)	2023	2024
Scope 1 – Direct Emissions	44.35	64.70
Scope 2 – Indirect Emissions	45.51	46.80
Scope 3 – Other Indirect Emissions	46.76	75.29
Total	136.62	186.80

Energy Consumption (MWh)	2022	2023	2024
Electricity	96.72	95.01	97.90
Natural gas	52.11	53.30	51.90
Total	148.83	148.31	149.80

Water Withdrawal by Source (m ³)	2022	2023	2024
Municipal Water Supply	683.71	866.85	780.86
Procured Drinking Water	31.76	28.80	32.08
Total	715.47	895.65	812.94

Discharged Water (m ³)	2022	2023	2024
Discharged water ⁷	643.92	806.09	731.64

Recovered Waste (kg)	2023	2024
Recovered non-hazardous waste	195.22	148.73
Recovered hazardous waste	28.25	149
Total	223.47	297.73

⁷ Not based on direct measurement; calculated in accordance with the Wastewater Treatment Plant Design Guidelines.

Performance Indicators

Social Performance Indicators

Employees by Category	2022		2023		2024	
	Female	Male	Female	Male	Female	Male
Number of employees	39	32	40	37	40	38
Total number of employees	71		77		78	
Number of white-collar employees	39	32	40	37	40	38
Total number of white-collar employees	71		77		78	
Number of blue-collar employees	0	0	0	0	0	0
Total number of blue-collar employees	0		0		0	

Employees by Employment	2022		2023		2024	
	Female	Male	Female	Male	Female	Male
Number of full-time employees	39	32	40	37	40	38
Number of part-time employees	0	0	0	0	0	0
Employees by Age						
	2022		2023		2024	
	Female	Male	Female	Male	Female	Male
Aged 30 and under	1	3	6	4	11	2
Aged 30-50	32	17	29	23	25	28
Aged 50 and above	6	12	5	10	2	10

Managers by Age	2023		2024	
	Female	Male	Female	Male
Aged 30 and under	0	0	0	0
Aged 30–50	3	5	10	5
Aged 50 and above	0	5	1	4

Employees by Term of Employment	2023		2024	
	Female	Male	Female	Male
0–5 years	18	15	23	25
5–10 years	16	13	5	3
10 years and over	6	9	12	10

Employees with Disabilities	2022		2023		2024	
	Female	Male	Female	Male	Female	Male
Number of employees with disabilities	0	1	0	1	0	1

Managers by Management Level	2023		2024	
	Female	Male	Female	Male
Board of Directors	0	16	1	15
Coordinator	0	5	1	5
Director	3	5	5	4
Deputy Director ⁸	-	-	5	4

Employees by Contract Type	2023		2024	
	Female	Male	Female	Male
Employees employed under indefinite-term employment contracts	38	37	39	37
Employees employed under fixed-term employment contracts	2	0	1	1
Employees covered by a collective bargaining agreement	19	14	20	13

⁸ The title of Deputy Director was incorporated into the organizational structure as of June 2024.

Training Indicators	2022	2023	2024
Total training hours (person-hours)	1,482	2,662	3,359

Maternity/Parental Leave	2023		2024	
	Female	Male	Female	Male
Number of employees benefiting from maternity/parental leave	2	0	3	0
Number of employees returning to work after maternity/parental leave	2	0	3	0

Performance Management	2022		2023		2024	
	Female	Male	Female	Male	Female	Male
Number of White-Collar employees undergoing a regular performance	39	31	40	36	40	37

Satisfaction Survey Results	2022	2023	2024
Employee satisfaction survey score ⁹	3.8	3.97	3.9

Number of Hires by Age and Gender	2023		2024	
	Female	Male	Female	Male
Aged 30 and under	5	2	6	1
Aged 30–50	3	1	3	6
Aged 50 and above	1	1	0	1

Number of Hires by Management Level	2023		2024	
	Female	Male	Female	Male
Number of managers hired	0	1	0	2

⁹ The Employee Satisfaction Survey is evaluated on a scale of 5.

Number of Employees Leaving by Age and Gender		2023		2024	
		Female	Male	Female	Male
Number of employees leaving		8	3	9	6
Aged 30 and under		6	0	0	0
Aged 30–50		2	2	6	4
Aged 50 and above		0	1	3	2

Number of Departures by Management Level		2023		2024	
		Female	Male	Female	Male
Number of managers leaving		1	0	2	1

Employee Turnover		2024
Employee turnover rate		16.7%

OHS Performance	2022	2023	2024
Total working hours	150.520	163.240	165.360
Number of lost days due to accidents	0	0	0
Number of accidents	0	0	0
Number of fatal accidents	0	0	0
Number of occupational diseases	0	0	0
Fatal accident rate ¹⁰	0	0	0
Occupational disease rate (ODR) ¹¹	0	0	0
Incident rate (IR) ¹²	0	0	0
Lost day rate (LDR) ¹³	0	0	0
OHS Trainings			
Total OHS training hours provided to employees (person-hours)	284	308	312

¹⁰ Total number of fatal accidents × 1,000,000 / Total working time (hours)¹¹ Total number of occupational diseases × 1,000,000 / Total working time (hours)¹² Total number of accidents × 1,000,000 / Total working time (hours)¹³ Number of lost days due to accidents × 1,000,000 / Total working time (hours)

GRI Content Index

Statement of use		The Banks Association of Türkiye has reported the information cited in this GRI content index for the period 01.01.2024–31.12.2024 with reference to the GRI Standards.			
GRI 1 used		GRI 1: Temel 2021			
GRI STANDARD	DISCLOSURE	Location/ Page No, Source and/or Direct Answers	GRI STANDARD	DISCLOSURE	Location/ Page No, Source and/or Direct Answers
GENERAL DISCLOSURES					
GRI 2: General Disclosures 2021	2-1 Organizational details	About the Report, About BAT	GRI 2: General Disclosures 2021	2-12 Role of the highest governance body in overseeing the management of impacts	Corporate Governance
	2-2 Entities included in the organization's sustainability reporting	About the Report		2-13 Delegation of responsibility for managing impacts	Corporate Governance
	2-3 Reporting period, frequency and contact point	About the Report		2-14 Role of the highest governance body in sustainability reporting	Corporate Governance
	2-4 Restatements of information	N/A		2-15 Conflicts of interest	Corporate Governance, Ethics and Compliance
	2-5 External assurance	No external audit services are obtained for this report.		2-16 Communication of critical concerns	Ethics and Compliance
	2-6 Activities, value chain and other business relationships	The BAT at a Glance		2-17 Collective knowledge of the highest governance body	Corporate Governance
	2-7 Employees	Employee Demographics, Social Performance Indicators		2-18 Evaluation of the performance of the highest governance body	Corporate Governance
	2-8 Workers who are not employees	N/A		2-19 Remuneration policies	Not disclosed due to confidentiality.
	2-9 Governance structure and composition	Corporate Governance		2-20 Process to determine remuneration	Not disclosed due to confidentiality.
	2-10 Nomination and selection of the highest governance body	Corporate Governance			
	2-11 Chair of the highest governance body	Corporate Governance			

GRI STANDARD	DISCLOSURE	Location/ Page No, Source and/or Direct Answers
GRI 2: General Disclosures 2021	2-21 Annual total compensation ratio	Not disclosed due to confidentiality.
	2-22 Statement on sustainable development strategy	Sustainability Approach
	2-23 Policy commitments	Corporate Governance
	2-24 Embedding policy commitments	Corporate Governance
	2-25 Processes to remediate negative impacts	Ethics and Compliance
	2-26 Mechanisms for seeking advice and raising concerns	Ethics and Compliance
	2-27 Compliance with laws and regulations	Ethics and Compliance
	2-28 Membership associations	Corporate Memberships
	2-29 Approach to stakeholder engagement	Stakeholder Engagement and Collaborations
	2-30 Collective bargaining agreements	There is no collective bargaining agreement within the organization.
MATERIAL TOPICS		
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Materiality Analysis
	3-2 List of material topics	Materiality Analysis
ECONOMIC PERFORMANCE		
GRI 3: Material Topics 2021	3-3 Management of material topics	Risk Management, Environmental and Social Risks
GRI 201: Economic Performance 2016	201-2 Financial implications and other risks and opportunities due to climate change	Risk Management, Environmental and Social Risks

GRI STANDARD	DISCLOSURE	Location/ Page No, Source and/or Direct Answers
GRI 3: Material Topics 2021	ENERGY	
	GRI 3: Material Topics 2021	3-3 Management of material topics
	GRI 302: Energy 2016	302-1 Energy consumption within the organization
GRI 303: Water and Effluents 2018	302-4 Reduction of energy consumption	Emissions and Energy Management
	WATER AND EFFLUENTS	
	GRI 3: Material Topics 2021	3-3 Management of material topics
		"303-1 Interactions with water as a shared resource"
		303-2 Management of water discharge-related impacts
		303-3 Water withdrawal
		Water Management, Environmental Performance Indicators
		303-4 Water discharge
		Water Management, Environmental Performance Indicators
		303-5 Water Consumption
		Water Management, Environmental Performance Indicators

GRI STANDARD	DISCLOSURE	Location/ Page No, Source and/or Direct Answers
EMISSIONS		
GRI 3: Material Topics 2021	3-3 Management of material topics	Emissions and Energy Management
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Emissions and Energy Management, Environmental Performance Indicators
	305-2 Energy indirect (Scope 2) GHG emissions	Emissions and Energy Management, Environmental Performance Indicators
	305-3 Other indirect (Scope 3) GHG emissions	Emissions and Energy Management, Environmental Performance Indicators
	305-5 Reduction of GHG emissions	Emissions and Energy Management
WASTE		
GRI 3: Material Topics 2021	3-3 Management of material topics	Waste Management
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	Waste Management
	306-2 Management of significant waste-related impacts	Waste Management
	306-3 Waste generated	Waste Management, Environmental Performance Indicators
	306-4 Waste diverted from disposal	Waste Management, Environmental Performance Indicators
	306-5 Waste directed to disposal	Waste Management, Environmental Performance Indicators

GRI STANDARD	DISCLOSURE	Location/ Page No, Source and/or Direct Answers
EMPLOYMENT		
GRI 3: Material Topics 2021	3-3 Management of material topics	Employee Satisfaction and Well-being
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Social Performance Indicators
	401-3 Parental leave	Equity, Diversity and Inclusion, Social Performance Indicators
OCCUPATIONAL HEALTH AND SAFETY		
GRI 3: Material Topics 2021	3-3 Management of material topics	Occupational Health and Safety
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Occupational Health and Safety
	403-2 Hazard identification, risk assessment, and incident investigation	Occupational Health and Safety
	403-3 Occupational health services	Occupational Health and Safety
	403-4 Worker participation, consultation, and communication on occupational health and safety	Occupational Health and Safety
	403-5 Worker training on occupational health and safety	Occupational Health and Safety
	403-6 Promotion of worker health	Occupational Health and Safety
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Occupational Health and Safety

GRI STANDARD	DISCLOSURE	Location/ Page No, Source and/or Direct Answers
GRI 403: Occupational Health and Safety 2018	403-8 Workers covered by an occupational health and safety management system	Occupational Health and Safety
	403-9 Work-related injuries	Occupational Health and Safety, Social Performance Indicators
	403-10 Work-related ill health	Occupational Health and Safety, Social Performance Indicators
TRAINING AND EDUCATION		
GRI 3: Material Topics 2021	3-3 Management of material topics	Training and Development
GRI 404: Training and Education	404-1 Average hours of training per year per employee	Training and Development, Social Performance Indicators
	404-2 Programs for upgrading employee skills and transition assistance programs	Training and Development, Social Performance Indicators
	404-3 Percentage of employees receiving regular performance and career development reviews	Performance Management, Social Performance Indicators
DIVERSITY AND EQUAL OPPORTUNITY		
GRI 3: Material Topics 2021	3-3 Management of material topics	Equity, Diversity and Inclusion
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Equity, Diversity and Inclusion, Social Performance Indicators
REGULATORY COMPLIANCE AND CAPACITY BUILDING		
GRI 3: Material Topics 2021	3-3 Management of material topics	Sectoral Sustainability Agenda and Guidance

GRI STANDARD	DISCLOSURE	Location/ Page No, Source and/or Direct Answers
SECTORAL SUSTAINABILITY AGENDA AND GUIDANCE		
GRI 3: Material Topics 2021	3-3 Management of material topics	Sectoral Sustainability Agenda and Guidance
DATA SECURITY AND CYBER RESILIENCE		
GRI 3: Material Topics 2021	3-3 Management of material topics	Data Security and Cyber Resilience
DIGITAL TRANSFORMATION		
GRI 3: Material Topics 2021	3-3 Management of material topics	Digitalization Processes
SUSTAINABLE FINANCE		
GRI 3: Material Topics 2021	3-3 Management of material topics	Sustainability Approach
FINANCIAL INCLUSION, AND FINANCIAL LITERACY		
GRI 3: Material Topics 2021	3-3 Management of material topics	Financial Inclusion, and Financial Literacy

CREDITS:

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