Annex 12: GRI Content Index

Content Index – Essentials With Reference option, as part of the Service, GRI Services reviewed whether the GRI content index was presented in a manner consistent with the reporting requirements of the GRI Standards and whether the information in the index was clearly presented and accessible to stakeholders. This service was performed on the Turkish version of the report.

GRI 1: Foundation

Statement of Use	T. Vakıflar Bankası T.A.O. has reported the information cited in this GRI content index for the period January 1, 2025–December 31, 2025, with reference to the GRI Standards.
GRI 1 used	GRI 1: Foundation 2021

GRI Standard	Disclosure	Relevant Section or Direct Answers	Page Number
General Disclosures			
GRI 2: General Disclosures 2021	2-1 Organizational details	VakıfBank at a Glance History and Ownership Structure	20 24-25
	2-2 Entities included in the organization's sustainability reporting	About the Report	13
	2-3 Reporting period, frequency and contact point	About the Report	13 551
	2-4 Restatements of information	Contact–Back Cover	542
	2-5 External assurance	No changes have been made to the information.	174-175
	2-6 Activities, value chain and other business relationships	Independent Assurance Statement	60
	2-7 Employees	Direct Economic Value Generated and Distributed	501-504
	2-8 Workers who are not employees	Annex 4: Social Performance Indicators	501-504
	2-9 Governance structure and composition	Annex 4: Social Performance Indicators	150
	2-10 Nomination and selection of the highest governance body	Committee Structures and Policies	134
	2-11 Chair of the highest governance body	Corporate Governance Principles Compliance Statement	140-143
	2-12 Role of the highest governance body in overseeing the management of impacts	Board of Directors	151-152
	2-13 Delegation of responsibility for managing impacts	Committees	151-152
	2-14 Role of the highest governance body in sustainability reporting	Declaration of Responsibility Committees	26 151-152
	2-15 Conflicts of interest	Committees Other Information on the Bank and Its Activities https://www.vakifbank.com.tr/en/investor-relations/corporate-governance/policies	151-152 161
	2-16 Communication of critical concerns	Stakeholder Communication and Transparency Communication Channels Memberships and Collaborations Committees	98 99 100 151-152
	2-17 Collective knowledge of the highest governance body	Board of Directors	140-143
	2-18 Evaluation of the performance of the highest governance body	Committees	151-152
	2-19 Remuneration policies	Committees https://www.vakifbank.com.tr/tr/bankamiz/hakkimizda/insan-kaynaklari/kariyer/bankacilik-pozisyonlari	151-152
	2-20 Process to determine remuneration	Committees	151-152
	2-21 Annual total compensation ratio	Financial Rights Committees	149 151-152
	2-22 Statement on sustainable development strategy	Our Material Topics and Sustainability Approach	38-57
	2-23 Policy commitments	Committee Structures and Policies	150
	2-24 Embedding policy commitments	Committee Structures and Policies Sustainability Management	150 170-171
	2-25 Processes to remediate negative impacts	Customer Experience and Satisfaction Ethical Principles of Banking Prevention of Laundering of Criminal Proceeds and Terrorism Financing Anti-Bribery and Anti-Corruption	96-97 167 168 169

GRI 2-4

GRI Standard	Disclosure	Relevant Section or Direct Answers	Page Number
	2-26 Mechanisms for seeking advice and raising concerns	Customer Experience and Satisfaction Ethical Principles of Banking	96-97 167
	2-27 Compliance with laws and regulations	During the reporting period, no fines or sanctions were imposed for non-compliance with laws and regulations.	543
	2-28 Membership associations	Memberships and Collaborations	100
	2-29 Approach to stakeholder engagement	Our Material Topics and Sustainability Approach	38-57
	2-30 Collective bargaining agreements	Annex 4: Social Performance Indicators	501-504

GRI Standard	Disclosure	Relevant Section or Direct Answers	Page Number
Material Topics			
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Our Material Topics and Sustainability Approach	38-57
	3-2 List of material topics	Our Material Topics and Sustainability Approach	46-47
Sustainable Financial Performance			
GRI 3: Material Topics 2021	3-3 Management of material topics	Our Financial Capital	58-73
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	Direct Economic Value Generated and Distributed	60
	201-2 Financial implications and other risks and opportunities due to climate change	Trends and Highlights in the Banking Sector Climate Change and Environmental Performance of the Bank Annex 11: Task Force on Climate-Related Financial Disclosures (TCFD)	36-37 128-131 541
	201-3 Defined benefit plan obligations and other retirement plans	Unconsolidated Financial Statements and Related Disclosures at December 31, 2025 — Disclosures on Obligations Related to Employees' Rights Consolidated Financial Statements and Related Disclosures at December 31, 2025 — Disclosures on Obligations Related to Employees' Rights	213-215 373-374
	201-4 Financial assistance received from government	Unconsolidated Financial Statements and Related Disclosures at December 31, 2025 DISCLOSURES REGARDING GOVERNMENT INCENTIVES Consolidated Financial Statements and Related Disclosures at December 31, 2025 — DISCLOSURES ON GOVERNMENT INCENTIVES	220 379
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	Responsible Finance and Sustainable Development Annex 2: Five-Year Summary Financial Information	64-73 498-499
	203-2 Significant indirect economic impacts	Direct Economic Value Generated and Distributed	60
Responsible Supply Chain Management			
GRI 3: Material Topics 2021 GRI 3: Material Topics 2021	3-3 Management of material topics	Responsible Supply Chain Supplier Selection and Compliance Policy https://www.vakifbank.com.tr/en/investor-relations/corporate-governance/policies	103
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	Responsible Supply Chain	103

GRI 2-27

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GRI Standard	Disclosure	Relevant Section or Direct Answers	Page Number
Business Ethics, Legal Compliance, and Transparency			
GRI 3: Material Topics 2021	3-3 Management of material topics	Banking Ethics Principles Compliance and Audit Prevention of Laundering of Criminal Proceeds and Terrorism Financing Anti-Bribery and Anti-Corruption Anti-Bribery and Anti-Corruption Policy https://www.vakifbank.com.tr/en/investor-relations/corporate-governance/policies Masak Compliance Policy https://www.vakifbank.com.tr/en/investor-relations/corporate-governance/policies	167 168 169
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	Prevention of Laundering of Criminal Proceeds and Terrorism Financing Anti-Bribery and Anti-Corruption	168 169
	205-2 Communication and training about anti-corruption policies and procedures	Prevention of Laundering of Criminal Proceeds and Terrorism Financing Anti-Bribery and Anti-Corruption	168 169
	205-3 Confirmed incidents of corruption and actions taken	Prevention of Laundering of Criminal Proceeds and Terrorism Financing Anti-Bribery and Anti-Corruption	168 169
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	During the reporting period, there are no lawsuits related to anti-competitive behavior, trust formation, or monopolistic activities.	544
Social Responsibility and Social Impact			
GRI 3: Material Topics 2021	3-3 Management of material topics	Corporate Social Responsibility at VakıfBank Unconsolidated Financial Statements and Related Disclosures at December 31, 2025 — EXPLANATIONS ON TAX PRACTICES Consolidated Financial Statements and Related Disclosures at December 31, 2025 — EXPLANATIONS ON TAX PRACTICES	101-102 215-218 375-378
	207-1 Approach to tax	VakıfBank operates in accordance with the principle of transparency in taxation. Within this scope, you can access our Bank's tax-related practices in the "Explanations on Tax Practices" section of Section III of the Independent Audit Report. In addition, our Bank contributes to the development of the financial system by sharing its views on tax-related matters with relevant institutions and organizations, with the aim of supporting sustainable development.	544

GRI 206-1,207-1

GRI Standard	Disclosure	Relevant Section or Direct Answers	Page Number
GRI 207: Tax 2019	207-2 Tax governance, control, and risk management	VakıfBank operates in accordance with the principle of transparency in taxation. Within the scope of tax transparency, our Bank is committed to acting in accordance with the principles of sustainable public tax governance and to implementing tax practices based on the rule of law and accountability. We believe that tax should be treated as an independent and strategic element within our corporate governance system. Tax management, which we consider part of our ESG performance, represents a proactive approach that contributes to sustainability. Within this scope, you can access our Bank's tax-related practices in the "Explanations on Tax Practices" section of Section III of the Independent Audit Report. In addition, our Bank contributes to the development of the financial system by sharing its views on tax-related matters with relevant institutions and organizations, aiming to support sustainable development. Our Bank exercises great care in financing sustainable projects and enhancing their value through potential tax incentives.	545
	207-3 Stakeholder engagement and management of concerns related to tax	VakıfBank operates in accordance with the principle of transparency in taxation. Within this scope, you can access our Bank's tax-related practices in the "Explanations on Tax Practices" section of Section III of the Independent Audit Report. In addition, our Bank contributes to the development of the financial system by sharing its views on tax-related matters with relevant institutions and organizations, aiming to support sustainable development.	545
	207-4 Country-by-country reporting	Our Bank conducts the relevant reporting for groups that fall under the scope of multinational enterprises and exceed the annual consolidated revenue threshold, in accordance with the Country-by-Country Reporting (CbCR) regulations in effect in Türkiye. Within this scope, as the ultimate parent company or authorized group company in Türkiye, we declare key financial and operational information—such as revenue, profit, taxes paid and accrued, and number of employees—for the countries in which we operate to the Revenue Administration on an annual basis. The reporting is submitted on time within the period specified after each reporting cycle. This practice aims to comply with international tax transparency standards and to provide our stakeholders with transparent information about our tax policy. In tax management, we act in compliance with the OECD's global tax practices and adopt the principles of not transferring created value to low-tax jurisdictions and avoiding practices that constitute tax evasion. We position our tax strategies not only within the framework of legal compliance but also as part of our ethical responsibility to society.	545

GRI 207-2,207-3,207-4

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GRI Standard	Disclosure	Relevant Section or Direct Answers	Page Number
Combating Climate Change and Environmental Compliance			
GRI 3: Material Topics 2021	3-3 Management of material topics	Climate Change and Environmental Performance of the Bank Sustainability Management Environmental Policy https://www.vakifbank.com.tr/en/investor-relations/corporate-governance/policies	128-131 170-171
GRI 101: Biodiversity 2024	101-2 Management of biodiversity impacts	Climate Change and Environmental Performance of the Bank	128-131
	101-4 Identification of biodiversity impacts	Climate Change and Environmental Performance of the Bank	128-131
	101-5 Locations with biodiversity impacts	Climate Change and Environmental Performance of the Bank	128-131
	101-6 Direct drivers of biodiversity loss	Climate Change and Environmental Performance of the Bank	128-131
	101-8 Ecosystem services	Climate Change and Environmental Performance of the Bank	128-131
GRI 302: Energy 2016	302-1 Energy consumption within the organization	Annex 3: Environmental Performance Indicators	500
	302-3 Energy intensity	Annex 3: Environmental Performance Indicators	500
	302-4 Reduction of energy consumption	Annex 3: Environmental Performance Indicators	500
GRI 303: Water and Effluents 2018	303-5 Water consumption	Annex 3: Environmental Performance Indicators	500
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Annex 3: Environmental Performance Indicators	500
	305-2 Energy indirect (Scope 2) GHG emissions	Annex 3: Environmental Performance Indicators	500
	305-3 Other indirect (Scope 3) GHG emissions	Annex 3: Environmental Performance Indicators	500
	305-4 GHG emissions intensity	Annex 3: Environmental Performance Indicators	500
	305-5 Reduction of GHG emissions	Annex 3: Environmental Performance Indicators	500
GRI 306: Environmental Compliance 2020	306-1 Waste generation and significant waste-related impacts	Climate Change and Environmental Performance of the Bank	128-131
	306-2 Management of significant waste-related impacts	Climate Change and Environmental Performance of the Bank	128-131
	306-3 Waste generated	Annex 3: Environmental Performance Indicators	500
	306-4 Waste diverted from disposal	Annex 3: Environmental Performance Indicators	500
	306-5 Waste directed to disposal	Annex 3: Environmental Performance Indicators	500
Equal Opportunity, Diversity, and Inclusion			
GRI 3: Material Topics 2021	3-3 Management of material topics	Our Human Capital Human Rights and Employee Rights Policy https://www.vakifbank.com.tr/en/investor-relations/corporate-governance/policies https://www.vakifbank.com.tr/en/investor-relations/corporate-governance/policies	110-124
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Annex 4: Social Performance Indicators	501-504
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Human Rights, Equal Opportunity, and Diversity Compensation and Benefits	114 115
	401-3 Parental leave	Annex 4: Social Performance Indicators	501-504

GRI Standard	Disclosure	Relevant Section or Direct Answers	Page Number
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Annex 4: Social Performance Indicators	501-504
	405-2 Ratio of basic salary and remuneration of women to men	No gender-based discrimination is applied in compensation. Remuneration is determined based on seniority and performance.	547
GRI 408: Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	VakıfBank does not employ child labor under any circumstances. We expect our suppliers to comply with the age requirements specified in the relevant laws and regulations.	547
Employee Engagement and Satisfaction			
GRI 3: Material Topics 2021	3-3 Management of material topics	Employee Engagement and Satisfaction Remuneration and Benefits Safe Work Environment Occupational Health and Safety Policy https://www.vakifbank.com.tr/en/investor-relations/corporate-governance/policies Remuneration Policy https://www.vakifbank.com.tr/en/investor-relations/corporate-governance/policies	112-113 115 116-117
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Safe Work Environment	116-117
	403-2 Hazard identification, risk assessment, and incident investigation	Safe Work Environment	116-117
	403-3 Occupational health services	Safe Work Environment	116-117
	403-4 Worker participation, consultation, and communication on occupational health and safety	Safe Work Environment	116-117
	403-5 Worker training on occupational health and safety	Safe Work Environment Employee Development and Training	116-117 120-123
	403-6 Promotion of worker health	Employee Engagement and Satisfaction Remuneration and Benefits Safe Work Environment	112-113 115 116-117
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Safe Work Environment	116-117
	403-8 Workers covered by an occupational health and safety management system	Annex 4: Social Performance Indicators	501-504
	403-9 Work-related injuries	Annex 4: Social Performance Indicators	501-504
	403-10 Work-related ill health	Annex 4: Social Performance Indicators	501-504
GRI 407: Freedom of Association and the Right to Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	Annex 4: Social Performance Indicators	501-504
Capacity Building and Talent Management			
GRI 3: Material Topics 2021	3-3 Management of material topics	Capacity Building and Talent Management Employee Development and Training	118-119 120-123
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	Annex 4: Social Performance Indicators	501-504
	404-2 Programs for upgrading employee skills and transition assistance programs	Employee Development and Training	120-123
	404-3 Percentage of employees receiving regular performance and career development reviews	Human Rights, Equal Opportunity, and Diversity Capacity Building and Talent Management	114 118-119

GRI 405-2,408-1

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GRI Standard	Disclosure	Relevant Section or Direct Answers	Page Number
Human Rights			
GRI 3: Material Topics 2021	3-3 Management of material topics	Human Rights, Equal Opportunity, and Diversity Human Rights and Employee Rights Policy https://www.vakifbank.com.tr/en/investor-relations/corporate-governance/policies	114
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	There have been no incidents of discrimination.	548
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	VakıfBank opposes forced and compulsory labor in accordance with the International Labour Organization's Convention No. 29 on Forced Labour, and expects the same commitment from its customers. In this regard, VakıfBank has not identified any activities that pose a significant risk. Human Rights and Employee Rights Policy https://www.vakifbank.com.tr/en/investor-relations/corporate-governance/policies	548
System Continuity and Data Security			
GRI 3: Material Topics 2021	3-3 Management of material topics	Business Continuity and Customer Information Security	84-85
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	There are no complaints regarding breaches of customer privacy or loss of customer data. Privacy and Cookie Policy https://www.vakifbank.com.tr/en/investor-relations/corporate-governance/policies	548
ESG Impact in Lending Processes			
GRI 3: Material Topics 2021	3-3 Management of material topics	Responsible Financing	71-72
Environmental Impact Management			
GRI 3: Material Topics 2021	3-3 Management of material topics	Annex 3: Environmental Performance Indicators	500
Digital Transformation, Innovation, and Artificial Intelligence			
GRI 3: Material Topics 2021	3-3 Management of material topics	Digital Transformation and Innovation Internet and Mobile Banking Information Technologies Business Continuity and Customer Information Security Applications and Innovations	76-79 80-81 82-83 84-85 86-87

GRI 406-1,409-1,418-1

GRI Standard	Disclosure	Relevant Section or Direct Answers	Page Number
Customer Experience and Satisfaction			
GRI 3: Material Topics 2021	3-3 Management of material topics	Customer Experience and Satisfaction	96-97
Sustainable Finance and Development			
GRI 3: Material Topics 2021	3-3 Management of material topics	Responsible Financing and Sustainable Development	64-72
Corporate Governance			
GRI 3: Material Topics 2021	3-3 Management of material topics	Corporate Governance	132-134
Proactive Risk Management			
GRI 3: Material Topics 2021	3-3 Management of material topics	Risk Management	162-166
Financial Literacy			
GRI 3: Material Topics 2021	3-3 Management of material topics	Corporate Social Responsibility in VakıfBank Employee Engagement and Satisfaction.	101-102 112-113
Financial Inclusion and Accessibility			
GRI 3: Material Topics 2021	3-3 Management of material topics	Digital Transformation and Innovation Internet and Mobile Banking Our Manufactured Capital Employee Engagement and Satisfaction Human Rights, Equal Opportunity, and Diversity Employee Development and Training Climate Change and Environmental Performance of the Bank	76-79 80-81 88-93 112-113 114 120-123 128-131
Stakeholder Engagement			
GRI 3: Material Topics 2021	3-3 Management of material topics	Stakeholder Communication and Transparency Communication Channels Memberships and Collaborations	98 99 100