

SUSTAINABILITY POLICY

1- PURPOSE

At VakıfBank, sustainable banking is positioned as a strategic priority. The Bank is committed to conducting its operations in line with international sustainability standards across Environmental, Social, and Governance (ESG) dimensions. In this context, VakıfBank aims to create long-term value and contribute to sustainable development by developing policies and practices aligned with the United Nations Sustainable Development Goals (SDGs).

Guided by the principles of long-term sustainable profitability and institutional growth, the Bank pursues its vision of becoming a globally competitive financial institution. Accordingly, it leverages its extensive expertise, broad service network, and strong stakeholder relationships to develop strategies that support production and employment while considering environmental and social impacts.

VakıfBank is dedicated to generating lasting and inclusive value for the national economy, society, and the environment in collaboration with all its stakeholders, primarily including customers, shareholders, employees, subsidiaries and affiliates, and suppliers. With this approach, the Bank commits to continuous improvement of its operations based on transparency, accountability, ethical values, and sound corporate governance principles.

2- SCOPE

This Policy outlines the core principles and guidelines that shape VakıfBank's sustainability approach. It applies to all areas of the Bank's operations, business processes, employees, subsidiaries and affiliates, and the entire supply chain, encompassing all stakeholders.

The Policy serves as a core reference framework for the implementation of sustainability goals across environmental, social, and governance (ESG) areas. It is implemented in full alignment with local and industry-specific regulations, and is maintained with a flexible and adaptable structure that considers the scale and scope of activities, as well as the nature and complexity of associated risks.

This Policy should be considered in conjunction with the following supporting policies and regulations that elaborate on VakıfBank's commitments in the field of sustainability:

- Environmental Policy
- Equal Opportunity Policy
- Human Rights and Employee Rights Policy
- Environmental and Social Impacts Management Policy in Lending Processes
- Supplier Selection and Compliance Policy
- Privacy Conditions and Protection of Personal Data
- Gender Equality Policy
- Anti-Bribery and Corruption Policy
- Occupational Health and Safety Policy

References made within this Policy to the Bank's various units, departments, and committees reflect their functional responsibilities and are intended to remain valid regardless of any future changes in their names.

3- SUSTAINABILITY PRINCIPLES

VakifBank has adopted the following principles in its approach to sustainability:

1. The Bank defines its sustainability strategy in alignment with national and international regulations, embedding sustainable banking at the core of its business strategies. It sets short-, medium-, and long-term goals that reflect the interests of its customers and all stakeholders, and aligns its business processes, policies, and governance structure with the criteria established by leading institutions in the field.

2. In conducting its operations, the Bank considers all sustainability-related risks and opportunities, including combating climate change and protecting natural ecosystems. These risks and opportunities are integrated into the Bank's strategies, operations, processes, and risk management according to their level of importance.

3. The Bank, including its subsidiaries and affiliates, develops policies and business models that promote positive environmental and social impacts while aiming to minimize any adverse effects that may result directly or indirectly from its operations.

4. VakifBank plays an active role in the transition to a low-carbon economy, one of the foundations of sustainable development. It sets targets to reduce greenhouse gas emissions from its operations and carries out efficiency initiatives in energy, water, waste management, and recycling to minimize its environmental footprint.

5. In line with its pioneering role in sustainable development, the Bank aims to access sustainable finance at both national and international levels. Through the funding it secures, it supports not only economic growth but also the conservation of natural resources and the principle of leaving a livable planet for future generations.

6. The Bank regularly discloses the activities carried out under its sustainability policy, the value created by these efforts, and related goals and performance metrics to shareholders, customers, employees, and other stakeholders, in accordance with the principles of transparency and accountability. Compliance with applicable regulations, particularly the Law on the Protection of Competition, is ensured throughout this process.

7. Referencing the Universal Declaration of Human Rights and the core conventions of the International Labour Organization, the Bank aims to establish a modern work environment founded on respect for human and employee rights, social justice, and the continuous development of labor rights. The Bank also ensures full compliance with occupational health and safety regulations. Through this approach, VakifBank aims to raise awareness and

strengthen the sustainability mindset among its employees, customers, suppliers, and all stakeholders.

8. In line with its Ethical Principles, the Bank strictly prohibits any form of discrimination based on language, religion, race, gender, philosophical belief, sect, or similar grounds, and takes necessary measures to prevent such conduct. It considers employee diversity to be a core element of its human capital.

9. The Bank is committed to supporting the career development of its employees; embedding sustainability into its corporate culture; enhancing employee competencies through effective and continuous training programs; and developing a skilled workforce based on the principle of equal opportunity.

10. It supports a fair compensation and rewards system that prioritizes employee well-being, fosters a culture of collaboration, and recognizes employee contributions to organizational performance and success.

11. The Bank respects employees' constitutional rights to unionize and engage in collective bargaining and actively supports the broader exercise of these rights.

12. The Bank is committed to sharing complete and transparent information about its products and services with customers and other stakeholders. It complies with consumer rights and data privacy regulations, supports customers in transitioning to sustainable business models, and prioritizes sustainability and technological innovation in product and service development. Customer feedback and complaints are carefully considered to enhance the customer experience and continuously improve service quality and business processes.

13. The Bank monitors advancements in information security and integrates international standards across all operations, including suppliers. It continuously improves its systems to ensure secure, efficient information management and embeds these practices throughout the organization.

14. It acts fairly, honestly, and impartially in supplier selection. The Bank evaluates the environmental and social impact of its supply sources and avoids procurement practices that do not align with its sustainability principles. It actively promotes sustainability throughout its supply chain.

15. To support sustainable development, the Bank engages in social responsibility initiatives across education, environmental protection, sports, and arts. It collaborates with a wide range of national and international stakeholders—including initiatives, NGOs, academic institutions, and public bodies—to share knowledge and experience. The Bank also conducts regular training to raise sustainability awareness among employees.

16. The Bank adheres to transparency, integrity, and ethical values in its gift and hospitality practices. It does not offer or accept gifts or hospitality that could create—or appear to create—a conflict of interest.

17. The Bank upholds a zero-tolerance policy on bribery and corruption. It is fully committed to complying with all relevant laws, regulations, and principles in this regard. Violations of the Anti-Bribery and Corruption Policy are subject to disciplinary action and legal consequences in accordance with applicable regulations.

18. Integrates its sustainability policy, principles, and strategy into all operations, business processes, and stakeholder relationships.

4- DUTIES and RESPONSIBILITIES

The Sustainability Committee is responsible for defining the Bank's sustainability strategy and policy and for ensuring that the necessary actions are taken accordingly. The Committee serves as the highest decision-making body within the Bank in matters related to sustainability.

5- OVERSIGHT / AUDIT

Implementation of the Sustainability Policy is carried out under the oversight of the Sustainability Committee, through the systems, policies, and business processes established by the relevant Head Office Units responsible for the impacted areas, in line with their respective responsibilities and to the extent applicable.

Monitoring and evaluation of compliance with this Policy are conducted as part of the Bank's internal audit activities, within the framework of related policies and procedures. Any non-compliance or areas identified for improvement during audits are followed up under the supervision of the Sustainability Committee.

6- REVIEW

The Sustainability Policy is reviewed at least once a year or as needed in light of emerging developments by the Sustainable Banking Department. Oversight of the policy's implementation, revision, improvement, and execution is the responsibility of the Sustainability Committee. Updates and changes are proposed by the Committee and come into effect following the approval of the Board of Directors.

In line with the principles of transparency and accountability, the Policy is made publicly available through the Bank's corporate website. It is also published and regularly updated on the Bank's internal intranet system to ensure easy access for employees.

Anyone with knowledge of, evidence of, or suspicion about any action or situation that may violate this Policy is required to report it via the Bank's Ethics Hotline.

7- EFFECTIVE DATE

This Policy was approved by the Board of Directors on July 24, 2025 and entered into force as of that date.