



IC HOLDING SUPPLIER CODE OF CONDUCT 2025

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1. INTRODUCTION

IC Holding's Code of Conduct aims to ensure safe working conditions at every stage of the supply chain, promote the responsible and ethical conduct of business processes, and uphold respect for human rights and the environment. These rules are binding on all suppliers, subcontractors and workforce providers and support the Company's sustainability and social responsibility commitments.

Suppliers are required to adopt and implement the Code of Conduct throughout their supply chains. Each supplier must ensure that its own sub-suppliers also accept and implement these rules. The adoption of the Code is based on the principle that all business activities must fully comply with applicable laws, rules and regulations. Based on internationally recognized standards and best practices, these rules may go beyond legal compliance to further advance social and environmental responsibility and business ethics.

These rules are derived from and uphold the following international standards:

- OECD (Organisation for Economic Co-operation and Development) Guidelines for Multinational Enterprises
- UNGPs (United Nations Guiding Principles on Business and Human Rights)
- ILO (International Labour Organization) Declaration on Fundamental Principles and Rights at Work
- ILO Fundamental Conventions
- UDHR (Universal Declaration of Human Rights)

The Code consists of five main sections covering "Working Conditions, Employee Rights and Equality, Occupational Health and Safety, Environment, and Ethics" and is continuously improved based on feedback from relevant stakeholders.

2. WORKING CONDITIONS

Suppliers are required to safeguard employees' fundamental human rights and treat them with respect and dignity. This obligation also covers direct and indirect suppliers and subcontractors, as well as temporary, migrant, student, contract and full-time workers.

2.1 Prohibition of Forced Labour

Suppliers must not permit any worker to be employed under forced labour, coercion or debt bondage. Human trafficking, forced labour and similar practices are strictly prohibited.

2.2 Young Workers

No person below the minimum working age specified by national legislation may be employed. Child labour is prohibited. Under Turkish Labour Law, workers aged 14–15 are classified as "child workers," while those aged 15–18 are classified as "young workers." The employment of young workers must comply with all requirements stipulated in applicable regulations, and practices that may adversely affect their health, safety or development must be avoided.

2.3 Working Hours and Compension

Working hours must comply with applicable laws and regulations. Employees must be provided with regular rest breaks and weekly days off. Overtime must be voluntary, must not exceed legal limits, and compliance with all these requirements must be ensured.

Wages paid to employees must comply with all applicable wage laws, including those relating to minimum wage, overtime pay and legally mandated entitlements. All employees must receive equal pay for equal work and qualifications. Deductions from wages for disciplinary purposes are prohibited.

3. EMPLOYEE RIGHTS AND EQUALITY

IC Holding expects its suppliers to provide their employees with a fair, safe and respectful working environment. In this regard, it is essential to ensure that all employees have equal rights, are protected from discrimination, can freely express their opinions and concerns, and that gender equality is safeguarded. Suppliers must fully comply with applicable legislation and IC Holding's approach to human rights and equality.

3.1 Discrimination, Harassment and Inhumane Treatment

Suppliers shall commit to providing a workplace free from harassment and unlawful discrimination.

Inhumane treatment of employees, including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or bullying, public humiliation, and verbal abuse, shall be prohibited. Threats of such treatment shall also be prohibited.

Suppliers shall commit to ensuring that discrimination or harassment based on race, color, age, sex, sexual orientation, gender identity or expression, ethnicity or national origin, disability, pregnancy, religion, political opinion, trade union membership, veteran status, or marital status does not occur in recruitment or employment practices, including compensation, promotions, rewards, and access to training opportunities.

In addition, suppliers shall provide employees with the flexibility necessary to observe their religious beliefs and practices and make reasonable accommodations to enable employees with disabilities to participate fully and equally in the workplace.

3.2 Employees' Right to Raise Concerns

Suppliers are required to provide a safe environment in which employees can freely express their opinions and concerns regarding working conditions and management practices. Discrimination, retaliation, threats or harassment in this process are strictly prohibited.

3.3. Gender Equality

Suppliers must strictly prohibit discrimination between women and men and ensure equal opportunities in recruitment, remuneration, promotion and training. The participation of women in the workforce is encouraged, and compliance with IC Holding's "Gender Equality Policy" is undertaken.

4. OCCUPATIONAL HEALTH AND SAFETY

Suppliers acknowledge that a safe and healthy working environment helps minimize work-related injuries and illnesses while improving product and service quality, continuity of production, employee engagement and motivation. They also acknowledge that ongoing employee input and training are essential for identifying and resolving occupational health and safety issues.

4.1 Safe Working Conditions

Suppliers must undertake to provide physical working environments, hygiene, food and accommodation conditions that protect employees' health and safety, and to take the necessary measures regarding machinery safety and ergonomics.

4.2 Occupational Accidents and Emergency Management

Systems must be established to prevent occupational accidents and diseases, the necessary records must be maintained and reports prepared, and timely medical assistance must be provided to employees. In addition, emergency response plans must be prepared for situations such as fires and natural disasters, and drills must be conducted.

4.3 Training and Communication

Employees must be informed and trained, both before commencing work and at regular intervals thereafter, regarding the occupational health and safety risks to which they may be exposed.

5. ENVIRONMENT

Suppliers undertake to identify environmental impacts, minimize adverse effects on society, the environment and natural resources, and protect public health and safety.

5.1 Environmental Permits and Reporting

All required environmental permits, approvals and registrations must be obtained and kept up to date, and their operational and reporting requirements must be complied with.

5.2 Pollution Prevention and Resource Conservation

Waste generation and pollutant emissions must be minimized or controlled at the source. Production processes must be improved to conserve natural resources, and recycling and reuse methods must be implemented.

5.3 Hazardous Substances

Substances that may pose a risk to human health or the environment must be identified, safely managed and disposed of.

5.4 Solid Waste Management

A systematic approach must be adopted to ensure the responsible management, reduction and recycling of non-hazardous waste.

5.5 Air Emissions

Suppliers must control air emissions arising from their activities in compliance with applicable legislation and, where feasible, take the necessary measures to treat or reduce such emissions.

5.6 Water Management

Effective programmes must be implemented to manage water use and wastewater, and wastewater must be appropriately treated before discharge.

5.7 Energy Consumption and Greenhouse Gas Emissions

Energy consumption and greenhouse gas emissions must be monitored, documented and reduced.

6. ETHICS

6.1 Business Integrity

The highest standards of integrity must be upheld in all business interactions, and all forms of bribery, corruption, extortion and embezzlement are prohibited.

6.2 Fair Business Practices and Commercial Integrity

Suppliers must uphold the principles of fair trade, transparency and competition in all their business activities. Practices that restrict competition, including bribery, corruption, the provision of improper advantages, price-fixing and market allocation, are strictly prohibited.

6.3 Conflicts of Interest

Suppliers must avoid conflicts of interest in their business relationships and disclose any potential conflicts to IC Holding.

6.4 Transparency of Information

All transactions must be conducted transparently and accurately reflected in business records. Suppliers must maintain all books and records accurately, completely and honestly to ensure compliance with their obligations under applicable legislation. Any books and records submitted by suppliers to the public, investors and competent authorities, including but not limited to reports, presentations, financial statements and accompanying notes, must be prepared accurately, completely and transparently. Information relating to transactions, health and safety, environmental practices, organisational structure, financial position and performance must be disclosed in accordance with applicable regulations.

6.5 Protection of Intellectual Property

Intellectual property rights must be respected. Technology and knowledge transfers must be carried out in a manner that protects these rights and safeguards customer and supplier information.

6.6 Identity Protection and Protection Against Retaliation

Employees and suppliers who report ethical violations or misconduct must be protected through confidentiality and security measures. Any form of retaliation against these individuals, including dismissal, threats, discrimination or similar actions, is strictly prohibited. Suppliers are required to establish appropriate procedures that enable employees to raise concerns safely.

6.7 Responsible Sourcing

Suppliers must adopt policies and practices to ensure the responsible sourcing of materials from conflict-affected and high-risk areas.

6.8 Confidentiality

Suppliers undertake to protect the personal information of everyone with whom they conduct business, including customers, consumers and employees. Privacy and information security laws must be complied with when collecting, storing, processing and sharing personal information.

Furthermore, any confidential information, whether written or verbal, obtained by suppliers as a result of their relationship with IC Holding shall be considered confidential. Such information must not be used for personal gain under any circumstances or shared with third parties.

6.9 Gifts and Hospitality

Suppliers must not, directly or indirectly, offer any gifts, hospitality or benefits to IC Holding employees or their close relatives that could be interpreted as an attempt to influence business decisions. Transparency and impartiality must be maintained in business relationships, and no benefits exceeding symbolic value or falling outside legal and reasonable limits may be offered.

7. MONITORING, COMPLIANCE AND CORRECTIVE ACTIONS

IC Holding reserves the right to monitor and audit suppliers' compliance with these rules. Audits may take the form of self-assessments, questionnaires, site visits or third-party audits. Suppliers are required to cooperate and provide the necessary information. Violations may have a significant impact on the business relationship. Repeated or serious violations may result in the termination of business relationships.

8. REPORTING CONCERNS AND MISCONDUCT

We expect our suppliers to raise their concerns and report any deficiencies or potential violations of this Code of Conduct to their designated contact persons at IC Holding or anonymously through the [IC Holding Contact Form](#) on the website by selecting "IC Holding Ethics Hotline" in the Subject field.

9. VERSION AND REVISION DETAILS

This Supplier Code of Conduct enters into force on 26 December 2025, upon approval by the Sustainability Committee, and may be updated as necessary by the Corporate Governance and Sustainability Department. These rules are reviewed and updated regularly to improve the Company's sustainability performance and foster stronger communication with stakeholders.