

IC İBRAHİM ÇEÇEN YATIRIM HOLDİNG A.Ş.

SUSTAINABILITY POLICY

At IC İbrahim Çeçen Yatırım Holding A.Ş. (IC Holding), we regard sustainability as a fundamental element of our approach to creating long-term value across the sectors in which we operate, managing environmental and social impacts, taking an integrated approach to risks and opportunities, and supporting progress in collaboration with our stakeholders. We acknowledge and undertake to implement and ensure the implementation of all our sustainability priorities and principles, with the participation of our Group Companies and employees, with the aim of continuous improvement.

Objective of the Policy

This Policy aims to guide the sustainability approach of IC Holding and its Group Companies in line with environmental, social and governance (ESG) impacts, risks and opportunities; support the integration of sustainability priorities into business processes; and set out the relevant commitments.

Scope of the Policy

This Policy applies to all employees, including the Board of Directors of IC Holding, our Group Companies, subcontractors, suppliers, visitors, local communities and all other relevant stakeholders. The principles set out in this Policy are promoted and implemented through business processes, procurement and contractual practices, training, audits, stakeholder engagement and relevant internal procedures.

Through this Sustainability Policy, IC Holding adopts the following guiding principles:

- To conduct all our activities in alignment with the United Nations Sustainable Development Goals (SDGs) that are directly relevant to IC Holding's priority sustainability topics and areas of operation, and to contribute to the relevant Goals, particularly SDG 5: Gender Equality, SDG 8: Decent Work and Economic Growth, SDG 9: Industry, Innovation and Infrastructure, SDG 13: Climate Action and SDG 15: Life on Land.
- To uphold the highest ethical standards across all sectors and geographies in which we operate; comply with applicable local legislation, relevant international standards and corporate governance principles; and ensure the effective functioning of anti-corruption and anti-bribery measures, conflict-of-interest prevention practices, transparency and accountability principles, and secure reporting mechanisms.
- To contribute to combating climate change by undertaking initiatives to increase the share of renewable energy in our total energy supply, reduce energy consumption through energy efficiency practices, measure greenhouse gas emissions across all our areas of operation, set emission reduction targets and implement projects to achieve them, and play an active role in our country's green transition.

- To continuously monitor and improve our processes and contribute to the circular economy in order to protect the environment and biodiversity by reducing our ecological footprint throughout our value chain.
- To take all necessary measures in accordance with the highest occupational health and safety standards to provide a working environment that ensures decent working conditions.
- To foster a workplace culture that promotes diversity, equity and inclusion across all our processes; provide equal opportunities in recruitment, remuneration, training, career development and promotion; and support access to employment for women, young people, persons with disabilities and disadvantaged groups.
- To regularly assess our employees' feedback and suggestions, implement the necessary improvement measures, and maintain high levels of employee satisfaction.
- To continuously improve the quality of our products and services in order to ensure customer satisfaction, safety and an accessible service experience.
- To support society and our stakeholders, particularly in the areas of education, healthcare, sports and the arts, through our corporate social responsibility projects in collaboration with the IC İbrahim Çeçen Foundation; and to establish partnerships with various institutions and organisations in the regions where we operate to deliver training and development activities that raise local communities' awareness of sustainability and enhance their capabilities in this area.
- To integrate sustainable supply chain practices into our procurement processes, conduct risk assessments and support the sustainability-related development of our suppliers.
- To regularly review our sustainability activities and processes; establish objectives and targets in light of identified risks and opportunities; and communicate our sustainability performance to all stakeholders on a regular basis, in accordance with the principles of transparency and accountability and in line with international standards.

Implementation of the Policy and Relevant Legislation

This Policy has been established by translating the requirements set out in applicable legislation and international standards into specific provisions governing the Company's practices. In the event of any conflict between this Policy and applicable legislation or international standards, IC Holding acknowledges that the applicable legislation shall prevail within its relevant scope of application.

Enforcement of the Policy

This Policy shall be reviewed periodically and updated whenever deemed necessary. The Corporate Governance and Sustainability Directorate is responsible for updating the Policy.

The Policy entered into force on 24 October 2022, following approval by the Board of Directors, and was revised on 6 October 2025.

Can ÇAKA
CEO