

IC İBRAHİM ÇEÇEN YATIRIM HOLDİNG A.Ş.

HUMAN RIGHTS POLICY

IC İbrahim Çeçen Yatırım Holding A.Ş. (IC Holding) regards respect for human rights as a fundamental element of its corporate culture, ethical business practices and decision-making processes in all its activities carried out with a sustainable development perspective. In this regard, we aim to provide a respectful, equal, inclusive and fair working environment for our employees and all our stakeholders. We offer equal opportunities to all our employees, regardless of race, language, age, gender, religion, ethnic origin or any other personal characteristic.

Objective of the Policy

This Policy aims to establish our approach to complying with all relevant standards within the framework of decent work, particularly with regard to our employees and all relevant stakeholders, acting in accordance with national and international legislation and standards, and continuously improving our practices in this area.

Scope of the Policy

This Policy applies to all employees, including the Board of Directors of IC Holding, our Group Companies, subcontractors, suppliers and local communities in the geographies where we operate. Through this Human Rights Policy, IC Holding adopts the following guiding principles:

- To act with the awareness that people are our most valuable asset.
- To comply with applicable national and international legislation and standards governing working conditions across all sectors in which we operate, both in Türkiye and abroad.
- To take the necessary measures to provide our employees with a healthy and safe working environment; ensure fair remuneration and benefits; comply with requirements relating to working hours and the right to rest; and promote work-life balance.
- To comply with applicable local legislation and the international agreements to which Türkiye is a party concerning forced labour and child labour.
- To respect diversity by mutually recognising and accepting our differences.
- To provide our employees with fair and appropriate remuneration and benefits.
- To establish productive working conditions that respect our employees' knowledge, expertise, skills and experience, and enable them to contribute their accumulated knowledge and experience in line with our Company's objectives.
- To prioritise the development of employees at all levels and continuously invest in people through a commitment to continuous learning and development, in line with the Company's objectives and strategies.

- To ensure transparency and fairness and refrain from discrimination against our employees in recruitment, promotion, compensation, benefits, training and all other employment-related matters and processes on the grounds of race, language, religion, religious beliefs, sect, ethnic origin, age, position, gender, gender identity, sexual orientation, colour, physical characteristics, country of birth, marital status, pregnancy, dependants, disability, social class, trade union membership or political opinion, and to impose the necessary sanctions in cases of discrimination.
- To pursue a transparent and open management approach to foster reliable and effective engagement.
- To adopt a zero-tolerance approach to all forms of verbal, physical, psychological, sexual and/or emotional harassment and, in the event of such incidents, to provide an appropriate environment in which employees can report them by exercising their right to freedom of expression.
- To ensure that our subcontractors, business partners and suppliers provide decent working conditions for their employees and respect human rights, and to take the necessary steps whenever any violation of human rights is identified.
- To respect the rights of communities in the geographies where we operate, strive to mitigate adverse impacts on their lives, foster long-term relationships by supporting stakeholder engagement, and take the expectations of all our stakeholders into consideration.

Implementation of the Policy and Relevant Legislation

This Policy has been established by translating the requirements set out in applicable legislation into specific provisions governing IC Holding's practices. Accordingly, all relevant legislation and regulations shall apply, particularly the Law on the Human Rights and Equality Institution of Türkiye, the Law on the Human Rights Inquiry Committee and the Occupational Health and Safety Law, as well as the United Nations human rights conventions. In the event of any conflict between applicable legislation and this Policy, 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