

IC İBRAHİM ÇEÇEN YATIRIM HOLDİNG A.Ş.

STAKEHOLDER ENGAGEMENT POLICY

As IC İbrahim Çeçen Yatırım Holding A.Ş. (IC Holding), we are committed to ensuring that all our internal and external stakeholders who are or may be affected by our activities are accurately informed about our operations, and we value their contribution to decisions that affect them through consultation and participation. We regard our stakeholders' views as an important feedback mechanism that we actively utilise to improve our sustainability performance and support our continuous improvement.

Objective of the Policy

This Policy aims to understand our stakeholders and their needs, provide adequate opportunities for them to express their views and opinions at all stages of relevant activities, establish positive and trust-based working relationships with our stakeholders, and continuously improve 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, business partners, customers, investors, lenders, suppliers, subcontractors, legal authorities, non-governmental organisations, relevant international organisations, universities, and local and national government institutions.

Through this Stakeholder Engagement Policy, IC Holding adopts the following principles as a general framework:

- Acting with an awareness of our responsibilities towards both our internal stakeholders, including our employees, and all external stakeholders with whom we interact throughout our activities.
- Adopting an approach based on transparency and accuracy to build stable and trust-based relationships with all our stakeholders.
- Providing clear, accessible and constructive communication that is easy for our stakeholders to understand and tailored to the needs of the relevant target groups.
- Providing information prior to decision-making through consultation activities and taking action with due consideration for our stakeholders' expectations.
- Meeting with our stakeholders periodically and organising events, seminars and social activities.
- Establishing a two-way communication system that enables both parties to exchange views and information, listen to one another, and raise concerns.
- Respecting local traditions, languages and decision-making processes, and ensuring that diverse perspectives are represented, irrespective of religion, sect, race, gender, political

opinion, age or disability, while also taking into account the views of vulnerable and/or minority groups.

- Establishing open and accessible mechanisms to respond to our stakeholders' concerns, suggestions and/or complaints, as well as feedback systems that enable stakeholders to submit their views and complaints on environmental and social performance, sustainability and related matters.
- Setting improvement targets for areas with low satisfaction levels and monitoring progress against these targets.
- Supporting stakeholders and programmes that contribute to sustainable development and create shared value.
- Collaborating with our stakeholders to develop solutions to potential future problems.
- Fulfilling our social and environmental responsibilities towards the communities in the regions where we operate through collaborative and coordinated engagement with all our stakeholders.

Implementation of the Policy and Relevant Legislation

This Policy commits to complying with and implementing the laws, regulations and principles applicable within the Republic of Türkiye. Where activities are carried out outside the borders of Türkiye, the applicable legislation of the relevant country shall be observed, and the more stringent requirements of the Policy and applicable legislation shall prevail. In the event of any inconsistency between the legislation in force and this Policy, IC Holding acknowledges that the applicable legislation shall take precedence.

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 upon approval by the Board of Directors on 24 October 2022 and was revised on 6 October 2025.

Can ÇAKA

CEO