

## IC İBRAHİM ÇEÇEN YATIRIM HOLDİNG A.Ş.

### ***DIVERSITY, EQUITY AND INCLUSION POLICY***

As IC İbrahim Çeçen Yatırım Holding A.Ş. (IC Holding), we believe that diversity, equity, and inclusion are essential elements of sustainable development, and we strive to foster a workplace free from discrimination. Accordingly, we provide equal opportunities to all our employees in recruitment, career development, promotion, equal pay for equal work, work-life balance, and employee benefits, regardless of race, language, religion, religious beliefs, sect, ethnic origin, age, position, sex, gender identity, sexual orientation, color, physical characteristics, country of birth, marital status, pregnancy, disability, or any other personal characteristic.

#### **Objective of the Policy**

This Policy aims to establish the framework for creating a fair and unbiased working environment in which no employee is subject to discrimination.

#### **Scope of the Policy**

This Policy applies to all employees of IC Holding, including the Board of Directors, as well as our group companies, subcontractors, suppliers, and local communities in the geographies where we operate.

Through this Diversity, Equity and Inclusion Policy, IC Holding adopts the following principles, guided by the Women's Empowerment Principles (WEPs), the United Nations Global Compact (UN Global Compact), and the DENK DEI Guide:

- To promote equal opportunities, diversity, and inclusion.
- To take diversity, equity, and inclusion into account in activity planning, data collection, strategy development, and budgeting processes.
- To raise awareness of diversity, equity, and inclusion in the workplace.
- To strengthen our corporate culture and improve diversity, equity, and inclusion practices and activities by collecting internal feedback through suggestion and grievance mechanisms.
- To take measures to prevent discrimination, harassment, and violence.
- To adopt a zero-tolerance approach to all forms of harassment, including verbal, physical, sexual, psychological, and/or emotional harassment, and to establish communication channels for reporting harassment incidents, ensure their impartial assessment, and address them through appropriate sanctions where deemed necessary.
- To ensure that all employees have equal access to training and promotion opportunities.
- To establish and continuously improve appropriate mechanisms to ensure that diversity, equity, and inclusion principles are reflected appropriately and transparently in recruitment processes.

- To promote the adoption of diversity, equity, and inclusion principles at all organizational levels through training, awareness-raising initiatives, and social responsibility projects.
- To develop supportive processes that enable employees who are parents to maintain a healthy work-life balance.
- To develop approaches that encourage all stakeholders to adhere to IC Holding's standards in the field of diversity, equity, and inclusion.
- To raise awareness among our suppliers, in particular, and support initiatives within our sphere of influence that contribute to the advancement of diversity, equity, and inclusion practices, including through the development of joint projects.
- To take an active role in initiatives promoting diversity, equity, and inclusion in Türkiye and worldwide by establishing collaborations and partnerships with various organizations, particularly national and international public institutions and organizations, and by supporting projects in this field.

### **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 conducted outside the borders of Türkiye, the applicable legislation of the country concerned shall be observed, and the more stringent applicable requirements shall prevail. In the event of any conflict between the legislation in force and this Policy, IC Holding acknowledges that the applicable legislation shall prevail.

### **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.

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CEO