

IC İBRAHİM ÇEÇEN YATIRIM HOLDİNG A.Ş.

BIODIVERSITY POLICY

As IC İbrahim Çeçen Yatırım Holding A.Ş. (IC Holding), we take into account the impacts of our activities on biodiversity and aim to continuously improve our efforts to protect nature.

This Policy sets out our approach to biodiversity conservation and the sustainable use of natural resources.

Objective of the Policy

This Policy aims to communicate our fundamental principles for managing the impacts of our operations and decisions on biodiversity to all stakeholders across our value chain, particularly our employees. It seeks to clearly define the strategic guidelines and responsibilities relating to ecosystem conservation, the protection of natural habitats, and the prevention of biodiversity loss.

Scope of the Policy

This Policy applies to all employees of IC İbrahim Çeçen Yatırım Holding A.Ş. (IC Holding), including members of its Board of Directors, as well as its subsidiaries and affiliates. In addition, suppliers, contractors, business partners, consultants, and all other individuals and organizations acting on behalf of IC Holding are encouraged to conduct their activities in accordance with this Policy.

Across all sectors in which it operates, IC Holding aims to promote the integration of nature conservation into its business processes by taking into account its impacts on biodiversity and ecosystems. In this context, relevant stakeholders are expected to act in accordance with applicable legislation and the fundamental principles of this Policy. The Biodiversity Policy forms part of IC Holding's sustainability-related strategies and policies.

Principles and Commitments

Through this Biodiversity Policy, IC Holding adopts the following principles and commits to putting them into practice:

- To support the conservation of nature, ecosystems, and biodiversity.
- To assess actual and potential impacts on biodiversity in the areas where we operate and, where deemed necessary, develop improvement and conservation initiatives.
- To consider approaches for avoiding and minimizing potential adverse impacts on biodiversity, rehabilitating affected areas, and managing compensatory measures where appropriate in new investments and projects. In areas with significant environmental and social impacts, to consider internationally recognized good practice frameworks, such as International Finance Corporation (IFC) Performance Standard 6 and the European Bank for Reconstruction and Development (EBRD) Performance Requirement 6.
- To address biodiversity management through an integrated approach that considers other

environmental issues, such as water, soil, climate change, and waste management.

- To develop practices that take into account the conservation of sensitive ecosystems, protected areas, and threatened species in the regions where our activities are carried out.
- To encourage cooperation with relevant public authorities, local governments, academic institutions, experts, and other stakeholders in our biodiversity conservation efforts.
- To consider international good practices and relevant standards, alongside national legislation, when assessing biodiversity-related risks and opportunities in investments and projects that may have significant environmental and social impacts.
- To integrate biodiversity considerations into environmental risk assessments as part of our sustainability approach.
- To contribute to reducing pressures on ecosystems by promoting the efficient use of natural resources.
- To encourage greater awareness of biodiversity conservation among our employees, suppliers, and other stakeholders.
- To regularly review our biodiversity management practices and improve them in line with the principle of continuous improvement.

Implementation of the Policy and Relevant Legislation

This Biodiversity Policy has been developed with due consideration of the environmental and biodiversity-related legislation, regulations, and permitting requirements in force in the countries where IC Holding operates.

IC Holding prioritizes compliance with applicable legal requirements in conducting its activities and aims to monitor national and international good practices relating to biodiversity conservation. The principles and commitments set out in this Policy are implemented by integrating them into IC Holding's environmental and sustainability management systems and business processes.

In the event of any discrepancy between applicable legislation and the provisions of this Policy, the applicable legal requirements shall prevail. However, to the extent permitted by law, the adoption of higher standards for biodiversity conservation is encouraged.

IC Holding aims to regularly review the effectiveness of this Policy and make the necessary updates in line with changing legal requirements, scientific developments, and good practices.

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 Sustainability Committee on 15 December 2025.

Can ÇAKA
CEO