

IC İBRAHİM ÇEÇEN YATIRIM HOLDİNG A.Ş.

SUSTAINABLE SUPPLY CHAIN POLICY

As IC İbrahim Çeçen Yatırım Holding A.Ş. ("IC Holding"), we are committed to ensuring that our supply chain and procurement operations are conducted sustainably across all regions in which we operate and are represented. With the aim of establishing, maintaining and developing long-term business relationships with our suppliers based on mutual trust and cooperation, we support our stakeholders and provide them with regular feedback to encourage continuous improvement.

Objective of the Policy

This Policy aims to establish the principles and requirements governing sustainability across our supply chain for all relevant stakeholders, particularly our employees.

Scope of the Policy

This Policy applies to all IC Holding employees, including the Board of Directors, all suppliers from which goods or services are procured, contractors, consultants, lawyers, auditors, and all other persons and entities acting on behalf of IC Holding.

Through this Sustainable Supply Chain Policy, IC Holding adopts the following guiding principles:

- Conducting procurement activities in compliance with applicable legal requirements and national and international best practices.
- Leveraging our influence to encourage suppliers to undertake initiatives aligned with the United Nations Sustainable Development Goals.
- Continuously improving our procurement processes from a sustainability perspective and managing procurement activities in line with circular economy principles.
- Giving preference in our procurement processes to suppliers that prioritize sustainability, manage their environmental and social impacts, and demonstrate a strong commitment to occupational health and safety requirements.
- Prioritizing support for local suppliers.
- Measuring and evaluating our suppliers' sustainability performance and supporting their continuous improvement.
- Contributing to the development of sustainability awareness and understanding through ongoing communication with suppliers.
- Conducting supplier selection and evaluation processes transparently.

In line with these principles, IC Holding expects its suppliers to:

- Conduct their operations in compliance with IC Holding's policies, including, but not limited to, the following:
 - IC Holding Sustainability Policy
 - IC Holding Environmental Policy
 - IC Holding Human Rights Policy
 - IC Holding Gender Equality Policy
 - IC Holding Occupational Health and Safety Policy
 - IC Holding Climate Change Policy
 - IC Holding Anti-Bribery and Anti-Corruption Policy
- Ensure that all suppliers sign the IC Holding Supplier Code of Conduct.
- Comply with all applicable legal requirements in the regions where they operate, including, but not limited to, legislation relating to environmental protection and occupational health and safety.
- Conduct their activities with due regard for human rights and without discrimination.
- Adopt a zero-tolerance approach to bribery and corruption, including both the offering and acceptance of bribes.

Supplier Risk Assessment and Audit Principles

- IC Holding regularly assesses the risk profiles of its suppliers as part of its sustainable supply chain management practices.
- Risk assessments cover priority areas such as environmental protection, occupational health and safety, human rights, ethical business practices, corporate governance and business continuity.
- Assessment results provide a basis for monitoring and improving supplier performance.
- Suppliers may be subject to scheduled or unannounced audits where deemed necessary.
- Audits review sustainability practices, compliance with contractual obligations and adherence to ethical principles.
- Where non-compliance is identified, suppliers are required to develop corrective action plans, and IC Holding provides the necessary guidance and support.

Training, Awareness and Capacity Building

IC Holding recognizes the importance of enhancing its suppliers' knowledge and capabilities in sustainability. Accordingly, training sessions, information meetings and awareness-raising activities for suppliers are planned based on identified needs.

These activities aim to raise awareness of environmental protection, occupational health and safety, ethical business practices and human rights; encourage suppliers to pursue continuous improvement in their own operations; and promote alignment with IC Holding's sustainability approach.

Ethical Violations and Reporting Mechanism

IC Holding places the utmost importance on compliance with ethical principles and legal requirements throughout its supply chain. Accordingly, suppliers and other stakeholders may confidentially and securely report any ethical violations, irregularities or grievances they encounter, as well as submit suggestions.

Reports may be submitted through the communication channels established by IC Holding:

- **Anonymous reporting via the website:** Reports may be submitted through the IC Holding Contact Form by selecting "[IC Holding Ethics Hotline](#)" in the "Subject" field.

All reports are handled confidentially. No stakeholder will be subjected to adverse treatment as a result of making a report in good faith. The information obtained is used to improve relevant processes and further develop sustainability practices.

Implementation of the Policy and Relevant Legislation

This Policy has been established to translate the requirements set out in applicable legislation and other relevant regulations into specific provisions governing IC Holding's practices. In the event of any inconsistency between applicable legislation and this Policy, IC Holding recognizes that the applicable legislation shall prevail.

Enforcement of the Policy

This Policy is 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