

**IC İBRAHİM ÇEÇEN YATIRIM HOLDİNG
A.Ş.*****HUMAN RIGHTS POLICY***

As IC İbrahim Çeçen Yatırım Holding A.Ş. (IC Holding), we give importance to safeguarding human rights during the activities we carry out with a sustainable development perspective. We adopt an understanding that respects human rights for our employees and all stakeholders with whom we have business relations, and we aim for fundamental human rights to be safeguarded throughout the society. In this context, we strive for an equal, inclusive and fair working environment that respects human rights for our employees. We offer equal opportunities to all our employees regardless of race, language, age, gender, religion, ethnic origin or any other personal characteristics.

As IC Holding, with this Human Rights Policy, we adopt the principles below as a general framework:

- Acting with the awareness that human beings are our most important asset,
- Acting in accordance with applicable national and international legislation and standards regarding working conditions in all sectors at home and abroad,
- Taking the necessary measures to provide a healthy and safe working environment for employees while aiming to safeguard human rights and provide a decent working environment,
- Acting in accordance with the relevant local legislation on child labor and international agreements to which Türkiye is a party in this field,
- Respecting diversity by mutually accepting our differences,
- Providing fair and appropriate remuneration and benefits to our employees,
- Creating productive professional and working conditions that allow our employees to transfer their experience in line with the objectives of our company by respecting their knowledge, know-how, equipment and experience,
- Prioritizing the development of our employees at all levels within the scope of the “continuous training and development” approach and in line with the company’s goals and strategies, and continuously “investing in people”,
- Not discriminating against our employees on the basis of race, language, religion, religious beliefs, sect, ethnic origin, age, position, gender, gender identity, sexual orientation, skin color, physical characteristics, country of birth, marital status, pregnancy, dependents, disability, social class, political opinion, etc. in employment-related matters such as recruitment, promotion, compensation, benefits, training and all other processes, and imposing the necessary sanctions on those who engage in discriminatory practices,
- Adopting a transparent and open management policy for reliable and efficient interaction,
- Adopting a zero-tolerance approach to all forms of verbal, physical, psychological, sexual and/or emotional harassment, and if such situations are encountered, offering the convenient environment for employees to report the case by exercising their right to freedom of expression,
- Ensuring that our subcontractors and suppliers act in accordance with human rights, and taking the necessary steps when any violation of human rights is noticed,

- Respecting the rights of the communities in the regions where we operate, striving to reduce the negative impacts on their lives, building long-term relationships by supporting stakeholder engagement, and considering the expectations of all our stakeholders.

Objective of the Policy

This policy aims to comply with all relevant standards within the framework of a decent work approach for all our stakeholders, especially our employees, to act in accordance with national and international legislation and standards, and to set out the policy for continuous improvement of our work in this field.

Scope of the Policy

This policy covers our employees, subcontractors, suppliers and local communities in the regions where we operate.

Implementation of the Policy and Relevant Legislation

This policy was formulated by concretizing and regulating the rules set forth by the legislation in force relevant to our company's practices. In this context, all relevant regulations, in particular the Law on the Human Rights and Equality Institution of Türkiye, the Law on the Human Rights Inquiry Commission, the Law on Occupational Health and Safety and the United Nations Convention on Human Rights, will be implemented first. In case of any incompatibility between the applicable legislation and this policy, IC Holding accepts that the applicable legislation will prevail.

Enforcement of the Policy

This policy is reviewed periodically and updated when deemed necessary. Directorate of Corporate Governance and Sustainability is responsible for updating the policy. The policy entered into force on October 24, 2022 upon the approval of the Board of Directors.

Murad BAYAR

CEO