

## IC GAYRİMENKUL YATIRIM ORTAKLIĞI A.Ş.

### SUSTAINABLE SUPPLY CHAIN POLICY

As IC Gayrimenkul Yatırım Ortaklığı A.Ş. (IC GYO), we care about the sustainable maintenance of our supply chain and procurement operations in all regions we operate. With the aim of establishing, conducting and developing long-term business relationships with our suppliers based on mutual trust and cooperation, we support our stakeholders and provide them feedback for improvement at regular intervals.

As IC GYO, with this Sustainable Supply Chain Policy, we adopt the principles below as a general framework:

- Carrying out procurement activities in compliance with relevant legal regulations and national and international best practices,
- With the power of being an employer, paving the way for our suppliers to engage in activities in line with the United Nations Sustainable Development Goals,
- Continuously improving our procurement processes with a sustainability perspective, and managing procurement processes with a circular economy perspective,
- In our procurement processes, prioritizing suppliers that give importance to sustainability issues, manage their environmental and social impacts, and observe occupational health and safety rules,
- Prioritizing supporting local suppliers,
- Contributing to the development of sustainability awareness and consciousness through continuous communication with suppliers,
- Conducting our supplier selection and evaluation processes in a transparent manner.

As IC GYO, our expectations from our suppliers and their sub-suppliers in the light of these principles are as follows;

- Conducting processes in compliance with IC GYO policies, including but not limited to the following, in addition to this policy;
  - IC GYO Sustainability Policy,
  - IC GYO Environmental Policy,
  - IC GYO Human Rights Policy,
  - IC GYO Gender Equality Policy
  - IC GYO Occupational Health and Safety Policy,
  - IC GYO Climate Change Policy,
  - IC GYO Anti-Bribery and Anti-Corruption Policy.

- All of our suppliers must sign the IC Holding Supplier Code of Conduct,
- Fulfilling all legal requirements of the activity area without being limited to the relevant legal legislation regarding the environment and occupational health and safety,
- Conducting activities in accordance with human rights and by avoiding discrimination,
- Adopting a zero-tolerance approach to bribery and corruption.

### **Supplier Risk Assessment and Audit Principles**

- IC GYO regularly assesses the risk profiles of its suppliers as part of sustainable supply chain management.
- Risk assessments cover priority areas such as the environment, occupational health and safety, human rights, ethical business practices, corporate governance, and business continuity.
- The results of these assessments form the basis for monitoring and improving supplier performance.
- Suppliers may be subject to scheduled or unannounced audits as deemed necessary.
- During audits, compliance with sustainability practices, contractual obligations, and ethical principles is reviewed.
- In cases where non-compliance is identified, suppliers are required to submit corrective action plans, and IC GYO provides the necessary guidance and support.

### **Training, Awareness, and Capacity Building**

IC GYO prioritizes enhancing its suppliers' knowledge and expertise in sustainability. In this context, training sessions, informational meetings, and awareness-raising initiatives tailored to suppliers' needs are planned. Through these activities, awareness will be raised on topics such as the environment, occupational health and safety, ethical business practices, and human rights; suppliers will be encouraged to implement continuous improvements in their own processes; and they will be encouraged to sustainability approach.

### **Ethics Violation and Reporting Mechanism**

IC GYO places the highest priority on compliance with ethical principles and legal regulations throughout the supply chain. In this context, suppliers and other stakeholders can safely and confidentially report any ethical violations, irregularities, complaints, or suggestions they encounter.

Reports are submitted through communication channels established by IC Holding:

- **Anonymous reporting via the website:** This can be done by selecting "IC Holding Ethics Hotline" in the Subject Field of the **IC Holding Contact Form**.

All reports are evaluated in accordance with the principle of confidentiality, and no stakeholder will face adverse consequences as a result of reports made in good faith. The information obtained is used to improve relevant processes and develop sustainability practices.

### **Objective of the Policy**

This policy aims to set out sustainability principles and rules within the scope of our supply chain for all our stakeholders, especially our employees.

### **Scope of the Policy**

This policy covers all IC GYO employees, including IC GYO Board of Directors, all suppliers and their sub-suppliers, customers, consultants, lawyers, auditors and all other persons and organizations working on behalf of IC GYO.

### **Implementation of the Policy and Relevant Legislation**

This policy was formulated by concretizing and regulating the rules set forth by the legislation and similar regulations in force relevant to our company's practices. In case of any incompatibility between the applicable legislation and this policy, IC GYO accepts that the applicable legislation will prevail.

### **Enforcement of the Policy**

This policy is reviewed periodically and updated when deemed necessary. Corporate Governance Committee is responsible for updating the policy.

This Policy and any changes made to it shall enter into force on the date of approval by the Board of Directors.