

Supply Chain Compliance Policy

1. PURPOSE

The purpose of this policy is to ensure that İÇDAŞ selects suppliers—whom it regards as stakeholders—from among individuals and/or organizations that share its values and adopt the same level of ethical standards, and to establish permanent, sustainable relationships with these suppliers.

This Policy covers İÇDAŞ's Board members, shareholders, company executives, other company employees, and suppliers with whom it maintains business partnerships.

2. FUNDAMENTAL PRINCIPLES

İÇDAŞ bases its procurement activities on the following principles and expects full compliance from all its suppliers.

2.1. Anti-Corruption and Anti-Bribery

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2.1.1. İÇDAŞ acts honestly and in accordance with the legislation and ethical values of the countries in which it operates.

2.1.2. It is strictly forbidden for the Group and its employees to be involved in any act related to bribery, corruption, misconduct, or money laundering, and a zero-tolerance policy is applied.

2.1.3. Accordingly, suppliers must not engage in any activities related to bribery, corruption, misconduct, or money laundering and must comply with all applicable anti-bribery laws, regulations, and international standards.

2.1.4. In the event of detecting any situation contrary to anti-corruption and ethical principles, the Supplier is obliged to report it to the İÇDAŞ Ethics Hotline.

2.1.5. Suppliers must act in accordance with relevant national and international legislation to which Turkey is a party, including but not limited to the Turkish Penal Code No. 5237, the Law



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on Prevention of Laundering Proceeds of Crime No. 5549, and the Turkish Commercial Code No. 6102.

2.2. Competition

2.2.1. İÇDAŞ attaches great importance to competing under free and fair market conditions and observing consumer welfare.

2.2.2. Suppliers are strictly prohibited from abusing their dominant position, engaging in price-fixing, market sharing, or any other behaviors and concerted practices that negatively affect competition.

2.3. International Trade Regulations

2.3.1. Suppliers must act in accordance with applicable international regulations regarding trade, export, and import.

2.3.2. İÇDAŞ respects international trade regulations implemented to protect the national security and foreign policy interests of states.

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2.4. Protection of Personal Data

2.4.1. İÇDAŞ respects the privacy of private life and protects the personal data obtained from suppliers with the highest level of sensitivity.

2.4.2. Suppliers must ensure that personal data shared by İÇDAŞ due to the business relationship is processed and stored lawfully, with all necessary security measures taken.



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2.5. Confidential Information

2.5.1. İÇDAŞ expects its suppliers to respect all information, including intellectual property rights, trade secrets, financial information, and sensitive/confidential data, and to take necessary security measures to protect such information.

2.5.2. Suppliers shall not disclose confidential information to third parties and shall only share minimum information within their own organization on a "need-to-know" basis.

2.5.3. It is strictly prohibited for suppliers to use İÇDAŞ's confidential information for their own benefit or for the benefit of other third parties.

2.6. Transparency and Conflict of Interest

2.6.1. İÇDAŞ evaluates its existing and potential suppliers equally and fairly within the framework of objective rules.

2.6.2. Board members, shareholders, and employees are obliged to protect İÇDAŞ's interests in the best possible way.

2.6.3. No economic or other relationship that may cause a conflict of interest may exist between suppliers and İÇDAŞ employees/their family members.

2.6.4. Suppliers are prohibited from using personal relationships to influence business decisions or pressure İÇDAŞ executives.

2.6.5. Any existing relationship (family, commercial, partnership, etc.) must be disclosed to İÇDAŞ beforehand or immediately upon occurrence.

2.6.6. Suppliers may not employ İÇDAŞ employees or their relatives as personnel, consultants, or interns. Discovery of such situations shall lead to termination of the commercial relationship.

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2.6.7. Business communication must be conducted through company-allocated phone numbers and email addresses. Communication through other channels is considered a violation of this Ethics Protocol.

2.7. Prevention of Forced Labor and Child Labor

2.7.1. All labor practices contrary to human rights, including forced labor, debt bondage, abuse, and physical punishment, are unacceptable. İÇDAŞ will not work with any supplier employing such practices.

2.7.2. It is prohibited to employ persons under the legal minimum age, and in any case, children under the age of 15.

2.8. Prevention of Discrimination and Humane Treatment

2.8.1. Suppliers must provide equal opportunities and act in a fair, non-discriminatory manner regardless of race, nationality, gender, sexual orientation, religion, age, or disability.

2.9. Working Conditions

2.9.1. İÇDAŞ provides a fair, safe, and inclusive environment. Suppliers must fulfill the same commitment.

2.9.2. Suppliers must comply with legislation regarding wages, overtime compensation, timely payments, maximum working hours, and leave entitlements.

2.10. Freedom of Association

2.10.1. The legal rights of employees regarding organization and collective bargaining must be respected.

2.11. Occupational Health and Safety

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2.11.1. Suppliers must provide a healthy and safe environment, provide necessary Personal Protective Equipment (PPE), and conduct regular OHS training.

2.11.2. Suppliers must comply with İÇDAŞ's OHS Policy published on its official website.

2.12. Environmental Protection

2.12.1. İÇDAŞ strives to minimize the environmental impact of its production processes and products.

2.12.2. Suppliers must comply with national laws and İÇDAŞ's Environmental Policy.

2.12.3. Efforts should be made to optimize resource use and minimize pollution and waste.

2.13. Management Systems

2.13.1. Suppliers must establish management systems such as Quality (ISO 9001), Environment (ISO 14001), OHS (ISO 45001), and Energy (ISO 50001).

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2.14. Gifts

2.14.1. It is strictly prohibited for suppliers to provide cash, gifts, payments, or hospitality that could influence or appear to influence business decisions.

2.15. Accurate Record-Keeping

2.15.1. İÇDAŞ maintains accurate and honest records and expects the same from its suppliers.

2.16. Audit

2.16.1. İÇDAŞ reserves the right to request information and documents or conduct on-site audits (directly or via third parties) to verify compliance with this policy.

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2.17. Liability

2.17.1. This policy does not create any contractual rights for suppliers against İÇDAŞ.

2.17.2. Compliance is the sole responsibility of the supplier.

2.17.3. İÇDAŞ reserves the right to unilaterally amend this policy.

2.18. Sustainability

2.18.1. İÇDAŞ adopts a proactive approach focused on efficiency and risk prevention.

2.18.3. Suppliers must comply with the Sustainability Policy published on the İÇDAŞ official website.

3. DEFINITIONS

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Supplier: A person or organization providing goods and services.

Supply Chain: The movement of a product or service from the supplier to the end consumer.

Misconduct/Abuse: The misuse of duty, authority, etc.

Intellectual Property Rights: Products of the mind belonging to a person or organization.

Proactive: Displaying a preventive and forward-looking attitude.

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4. RESPONSIBILITIES

4.1. The Domestic Purchasing Department and International Purchasing Department are responsible for the preparation, revision, and updating of this policy.

4.2. All suppliers and their employees are responsible for acting in accordance with this policy published on the official İÇDAŞ website.

Board of Directors

14.01.2026