



BİSKÜVİ SANAYİ A.Ş.

ÜLKER BİSKÜVİ CODE OF CONDUCT

Message from the Chairman,

As Ülker Bisküvi and its associates, we are known not only for the success of our business and our contribution to the economy, but for our ethical reputation as well. As we have in the past, today we place a lot of importance on being known for our exceptional work ethics.

Hence, as we update our vision and mission, we have reviewed our ethical principles according to the needs of today and made them a part of the written culture of Ülker Bisküvi.

When we examine the ethical guidelines regulating our rules for working together as part of Ülker Bisküvi, despite many pages and headings, we can see that our behavior and principles stem from essential human values.

The universal principle in this regard is to avoid behaviors towards others that one is not willing to have exhibited towards herself or himself. After all, the essence of the matter is to listen to the voice of one's conscience.

Although these ethical values constitute the basis of business, we have witnessed that the evolution of the global trade, change and diversify the time, technology and society as the traditional ways of conducting business. Even the fact that the Internet has come into our lives, comprises an example of why it is necessary to come up with new ethical statements, according to these new behavior patterns.

The ethical rules and operation principles of Ülker Bisküvi cover the universal work ethics principles of the 21st century, and they also refer to the founding philosophy and work ethics of our company established in the 20th century.

Our work principles have been a source of great pride for long years. They were shaped in accordance with our ethical rules and play an important role in establishing an environment with sustainable trust and respect.

We should never consider the ethics governing our relations with our shareholders, consumers, employees and society separately from the work we do. On the contrary, we must remember that these are the rules that complete our work and support all of our goals and activities.

As it is emphasized in our commitment, we;

- Inspire trust by operating with respect for our people, society, the health & wellness of our consumers and the environment.
- Fulfill our corporate social responsibility obligations while acting according to the open communication and honesty principles.
- Ensure to provide a trustworthy workplace that respects human rights.

It is our sincere wish that this study, as a written expression of the ethical values, which comprise the basis of our corporate culture, provide guidance regarding the way we work.

Murat ÜLKER
Chairman of Ülker Bisküvi

DESCRIPTION, PURPOSE AND SCOPE

For Ülker Bisküvi and its associates, “Code of Conduct” stands for a “body of behaviors” that are to be lived as well as to be avoided and is based on the principle of “honesty.”

The purpose of the Ülker Bisküvi Code of Conduct is to establish a common corporate culture regarding work ethics and to increase consciousness, sensitivity and awareness regarding these issues.

“Code of Conduct” aims to provide guidance for workplace behaviors, not only in legal and commercial sense but also from an ethical point of view with all parties in business processes.

Ülker Bisküvi Code of Conduct covers the relationship between customers, employees, shareholders, business partners, suppliers, competitors, public institutions and society.

Code of conduct and its principles have been approved by the Board of Directors in Ülker Bisküvi Sanayi A.Ş. while the board fully support and manage these principles.

Code of conduct document regulates principles, implementations, and governance of bribery, corruption, facilitation payment, compliance with related law and regulations, political donations, as well as receiving and giving gifts and amenities. Any ethical principles and regulations mentioned in any other reports denote the principles, implementation and governance within the context of this document.

In this Code of Conduct document, managers are also covered within the concept of employees.

COMPLIANCE WITH THE LAWS AND RESPONSIBILITIES

We conduct all of our activities and procedures in Turkey and abroad within the framework of the law and international legislation.

We value correct and timely communication in our relationships with legislative offices and organizations.

We conduct our operations according to the laws, regulations and professional standards, within the Ülker Bisküvi Code of Conduct.

HUMAN AND EMPLOYEE RIGHTS

We fully support the OECD Guidelines for Multinational Enterprises and adhering to International Labor Organization’s (ILO) declarations of non-discrimination, elimination of child labor, forced labor, collective bargaining and freedom of association.

We respect human rights, individual differences and personal characteristics of people.

As Ülker Bisküvi, we support United Nations Universal Declaration of Human Rights.

We commit to provide equal opportunities for our employees and candidates applying for jobs in our company. We protect the confidentiality of personal information.

We refuse discrimination based on gender, race, religion, marital status, political opinions, disability, age, etc.

We provide a suitable working environment for our employees where they can feel safe, comfortable and valued.

As Ülker Bisküvi, we refuse the use of child labor that is in breach the principles set by ILO.

We do not work with any supplier or subcontractor using child labor that is in breach the principles set by ILO.

As Ülker Bisküvi, we refuse the use of all forms of forced or compulsory labour.

We respect our employees' rights to collective bargaining and their freedom of association

We immediately engage with government authorities in the counties or regions we operate, when human rights are at risk.

We evaluate the work performance of our employees through objective methods and tools and according to the results, provide opportunities for improvement for development areas.

Opposed to a negative environment based on competition, we encourage system based on solitary and cooperation, where success is shared.

We support off-time social activities of our employees, thereby enriching their social lives. Being primarily a food company, we allow our employees freely taste the products they manufacture.

We emphasize solidarity with our employees and their families in such extraordinary circumstances as natural disasters.

Mobbing

Mobbing is defined as intimidation of employees by psychological violence, pressure, obstruction and harassment.

We have developed procedures to prevent mobbing and to protect our employees from behaviors that may be considered criminal offences under the applicable criminal laws.

We care about protecting our employees' dignity and we don't tolerate any breach of their personal values, or allow them to be terrorized by emotional attacks of any kind like psychological pressure and harassment, no matter from whom it comes.

ENVIRONMENT, HEALTH AND SAFETY

As an environmental-friendly company, we conduct our activities in full accordance with environmental legislation.

We work towards decreasing air, water and soil pollution, implementing recycling in order to decrease the amount of waste.

Developing methods for the conservation of such natural resources such as energy and water, we conduct studies for the efficient use of these.

We detect risks with regard to the environment and take precautions to minimize them.

We raise the awareness of our employees and subcontractors by providing trainings regarding environmental protection.

In our operations, we follow all health and safety laws, and standards. We implement "Risk Management" principles in order to establish safe and healthy working environments.

We ensure and enforce the use of sufficient protective equipment and safety measures.

We do not allow the use of any alcohol or drugs at the workplace and/or affecting work performance and do not allow smoking outdoors except in the designated areas.

We emphasize to all our employees that implementing company policies and regulations regarding health and safety at work place is an important responsibility for each of them.

As a food company, we respect the health of our society and consumers.

Apart from complying with the legal regulations regarding food safety, we develop best practices in cooperation with non-governmental organizations and scientific institutions.

OUR RESPONSIBILITIES TO SHAREHOLDERS

We manage the resources and assets of our company with efficiency and foresight in favor of the interests of our shareholders.

We also consider the opinions of our shareholders in decision-making processes. We regulate our relations with them in the context of financial discipline and transparency.

Any transaction with regard to our public companies is conducted in compliance with the legal processes of Turkey.

We conduct our investments in the areas that will improve our competitive capability and provide high income for our shareholders, allowing for sustainable profitability.

Our announcements to the public and shareholders provide clear, timely, accurate information regarding our financial tables, strategies, investments and risk profile within the scope of the applicable laws.

POLITICAL ACTIVITIES

Ülker Bisküvi and its associates do not engage in collaborative or supportive actions with political parties or groups and do not conduct activities on behalf of political parties.

Political donations by Ülker Bisküvi is strictly forbidden in any circumstances

Any decisions of our employees to contribute to any political or social activity are completely personal decisions and not to be associated with the company.

However, we insist that our employees conduct their political activities outside working hours and are not to solicit their colleagues regarding the subject. Also, our employees are strictly prohibited from using the company name, their company position, and their title or company resources for any political activities.

SOCIAL RESPONSIBILITY, VOLUNTEERING, DONATIONS AND ENVIRONMENTAL SUSTAINABILITY

Being socially aware, we participate in projects to contribute to the development of society and make donations.

We require that our corporate donations and social support are conducted for projects, organizations and institutions in compliance with our internal regulations, Ülker Bisküvi Code of Conduct and company status.

We do not provide donations for private accounts and profit-oriented organizations.

We encourage our employees to participate in social activities such as environment, health, education, sports and embrace their individual volunteering, provided that such activities are conducted with their own resources, outside working hours and do not affect their work performance.

We pursue human and social healthcare and protect the environment in our own activities and in the activities of our suppliers and business partners.

OUR RESPONSIBILITIES TO THIRD PARTIES

Relations with public institutions and organizations

While conducting all of our activities and procedures, we treat all public institutions and organizations, non-governmental organizations and political parties equally, without any expectation of benefits.

We avoid any kind of relation, influence or activity that might prevent fair decision making regarding our activities.

We do not provide any activities of pecuniary or non-pecuniary value to any public officials.

We provide timely, accurate, correct and clear information to the public and our shareholders.

We provide the public with any kind of information including developments and changes that might have an effect on the value of the investments traded in the capital markets, within the legally defined terms.

We protect the confidentiality of the internal information not to be disclosed to the public.

We hold our employees participating in tender offers, tender preparations or agreement negotiations responsible for any statements, correspondence and declarations provided to the relevant parties to be correct and true.

Relations with suppliers, contractors and business partners

We are attentive to being always honest and fair in our relations with our suppliers, contractors and business partners.

Ülker Bisküvi's Code of Conduct booklet provided to our suppliers, contractors and business partners.

We expect our suppliers, contractors and business partners to comply with the Ülker Bisküvi Code of Conduct, to share the same values and act accordingly.

We require our suppliers, contractors and business partners to conduct their activities in compliance with the laws and regulations related to ethical principles to pursue the rights of their employees and act in accordance with the standards of environment protection etc.

Relations with the customers and consumers

The satisfaction and happiness of our customers and consumers is a top priority.

We avoid unfair or deceptive activities in our relations with them.

We value the opinions, requests and complaints of our customers and consumers, consider them in our decisions.

We rapidly eliminate any problems regarding our products that occur caused by our company or our channels during the process of delivery to the consumers, and try to improve the product quality to exceed the consumer's expectations.

We aim at providing the best service by focusing on the changing customer and market needs.

Relations with competitors and compliance with the competition legislation

We undertake to comply with the fair competition rules in all countries of our activities and to comply with all relevant laws and regulations.

We also compel our employees to comply with the laws and regulations.

We do not make negative statements against our competitors or their management and we avoid any commentary which may cause speculation about them.

We never take illegal or unethical actions to obtain information regarding other companies.

We develop regulations to prevent our employees from taking such actions as well.

We do not allow our employees to disclose any data determining or affecting the company's competitive behavior. Also, we do not tolerate our employees secretly gathering any market information from others by means of industrial espionage, bribery or theft.

Relations with media

We follow an open and transparent communication model with the media.

We ensure that our corporate messages, information and commentaries do not mislead the public.

We treat media organizations equally and form equal relationships.

Any requests from the media regarding financial or sector information about Ülker Bisküvi and its associates are responded to in coordination with corporate communications department. We forward questions and requests from the media to the relevant department and we prefer to have written communications with the media.

DISTINCTION OF CORPORATE AND PERSONAL INTERESTS

Definition of conflict of interest

The situation where employees, family members and close relatives benefit from commercial activities conducted with the customers and suppliers of Ülker Bisküvi and its associates is defined as a conflict of interest.

We do not allow our employees to work in the position of any company's supplier. Likewise, neither family members, nor the relatives of our employees can be a supplier of the company.

We do not allow our employees to invest in our suppliers or lend them money in a way that might cause conflict of interest.

Similarly, we do not allow our employees to benefit from special advantages and conditions provided by the supplier to the company for their personal benefit.

We recommend that our employees disclose to the ethical board and their superiors in order to be informed whether any activities of such nature may or may not cause a conflict of interest.

Receiving and giving gifts and amenities

We do not allow our employees to receive from or give to any money or redeemable gifts to or from the customers and suppliers of Ülker Bisküvi and its associates that might affect their impartiality and decisions.

Our employees are rewarded with gifts through an internal reward system within the structure of our company.

Other than that, our employees are obliged to comply with the relevant company regulations regarding receiving and giving gifts.

Investments by the employees

We compel the employees of our public companies and their employees who have internal access to

information to act in accordance with the Public Information Policy and Regulation of the relevant company.

We do not allow our employees to make any investments to or lend money to the main company or branch of any supplier affiliated with the Company without the permission of the Chairman, or to demand profit from special advantages and conditions introduced to the company for the suppliers or customers of Ülker Bisküvi for personal interest.

Purchase and sales policy of company's equity shares

We compel our employees to comply with the legal regulations and company's internal procedures regarding the purchase and sale of company equity shares to avoid any conflict of interests.

Duties outside the company

We expect our employees to comply with their employment agreements and loyalty rules.

In accordance with the enforced regulations of the company, we do not allow our full time employees to work for any other organization outside our company.

We do not allow our employees to conduct activities directly or indirectly defined as "tradesman".

Likewise, our employees are not allowed to be employed by competitors or companies that have business relations with the Company.

We allow our part-time employees or employees with consultant status to conduct outside activities with exception of competitors, provided that they inform the management of the company they are affiliated with.

Participation of employees in activities as speakers

According to the company information policy, appointed company spokesmen/representatives may share the information approved by the corporate communication and relevant departments with public.

Any charges accrued due to any duty representing the company, conducted in any kind of association, employer union or similar non-governmental organization shall be covered by the relevant organization

Any payments made by Ülker Bisküvi employees in exchange for a seminar speaker charge or similar service shall also be covered by the relevant organization.

With exception of gifts with pecuniary value, our employees may accept such symbolic remembrances as awards, trophy, etc.

Relatives and friends

Any managers authorized for employment decisions may not hire their first degree relatives and their relatives.

Our employees are obliged to notify the company in written form within one month in case any of their first degree relatives are employed in critical positions by any competitor.

Representation and entertainment

We have funds available for customer entertainment and expenses for business meetings costs. We expect that the funds are spent only for relevant events and we do not allow transfer between budget expenditure areas.

It is essential that all expenditures are documented by invoices and invoices from other places cannot

be obtained for expenditures which are not invoiced.

We require legally compliant notes of expenses where necessary.

Non-deductible expenses are kept in non-deductible expense accounts and are recorded to the receivable accounts of the relevant companies.

Business related entertainment activities are carefully examined by means of corporate standards and relevant internal regulations, and are approved by the company's senior management. Any entertainment expenses other than these are not allowed.

Insider Information

Our employees are not allowed to ever disclose any publicly undisclosed information to third parties, either for their personal interest or for the interest of anyone outside the company.

It is strictly prohibited for any employee with access to insider information to profit and/or provide profit to third persons by using such information (insider trading).

Persons with access to insider information are the Chairman and the members of the Board of Directors of the public company, managers (directors and senior management), auditors, those who may have access to insider information during execution of their professions and duties and those who directly or indirectly may have access to insider information because they are known to have contact with the persons mentioned above.

We compel the employees of the public companies of Ülker Bisküvi and our employees with access to corporate information, to comply with the obligations indicated in the relevant communiqué of the

Capital Markets Board and company policies.

Employees of Ülker Bisküvi, other than those indicated above, can freely purchase and sell Ülker Bisküvi equity shares, assessing publicly disclosed information without any time limitation.

The practices indicated above are also applied to first degree relatives of the persons mentioned above and any procedures conducted by first degree relatives shall be considered to have been conducted by the persons mentioned above.

ANTI-MONEY LAUNDERING AND ANTI-CORRUPTION

Any kind of aiding and abetting of a person committing a crime or breaking the law by means of legitimizing the sources of income or merchandises, providing direct or indirect profit using deceptive means and tools, participation in any process aimed at investment, concealment or laundering of the resources obtained by means of such activities, are defined as money laundering.

We compel our employees to take great care to fight against money laundering and corruption.

For this purpose, our employees are obliged to comply with all provisions of the enforced laws, regulations and company policy.

Ülker Bisküvi is obliged to fight against money laundering activities and to support the efforts regarding the prevention of money laundering activities.

PROTECTION OF COMPANY ASSETS AND DATA CONFIDENTIALITY

Protection of corporate assets

Our employees are responsible for proper use of all active assets and resources of the group including

intellectual property rights, technology, computer hardware and support, software, immovable properties, machinery and equipment, raw materials, company vehicles and cash reserves.

The equipment, systems, facilities and assets of Ülker Bisküvi and its associates can only be used to execute the operations of the company, or for purposes permitted by the management.

Unless it is otherwise specified in the regulations published by the company, company assets may not be used for personal purposes or for the benefit of any person outside the company.

We expect our employees to use company assets in compliance with the corporate principles and regulations.

We take preventive measures against the use of company assets by unauthorized third persons or against any damage to company assets.

Use of IT resources

The IT resources of Ülker Bisküvi and its associates contain all computer hardware owned, leased by or leased to the company.

The hardware in question covers any kind of software, PCs, laptops, network servers, internet access, intranet and e-mail access devices.

All IT resources of Ülker Bisküvi, any information created, stored or transferred using these resources are the property of Ülker Bisküvi. Our employees use these resources properly and responsibly for work purposes in accordance with the laws and company regulations and take necessary precautions to protect these resources and prevent the access by unauthorized third persons.

Confidential information and principles of protection of confidential information

The scope of the confidential information of Ülker Bisküvi and associates includes, but is not limited to the following: "Commercial information, technical data, financial data, production data, customer information, personal information, product information, equipment and application information, technical formulae and drawings, system and program information, purchase information, engineering information, regulations, work plans and all information not disclosed to the public." This information is not defined as confidential but is confidential.

While performing their duties, our employees protect all confidential information/documents they have access to.

The confidential information they access is used only for the benefit of the work they conduct for the company, within the framework of legal and ethical rules.

Our employees are strictly prohibited to disclose any publicly undisclosed information to third parties for either personal gain or for the benefit of anyone outside the company.

Even when our employees quit their job, they are strictly prohibited to directly or indirectly use or make use of any confidential information or documents of the company that are indicated above, either in writing or verbally, for personal gain or for the benefit of third parties, without the written permission of the company.

We expect our employees to pay maximum attention to the matters of data confidentiality and security while using any kind of IT resources and electronic communication tools.

We expect our employees to comply with the company policies and instructions without exception, and to take the necessary precautions to prevent access of unauthorized persons to confidential information or any leakage of confidential information.

Intellectual property rights

The scope of the "Intellectual Property Rights" of Ülker Bisküvi includes, but is not limited to, the following: "intellectual rights of Ülker Bisküvi and its associates such as brands, patents, databases,

printed communication materials, processes, advertisements, product packages, labels and plans (marketing, production, technique), product designs, know-how and any information, including any kind of innovations written, invented, developed, produced or implemented by the employees.”

Any commercial/financial rights of intellectual properties generated by our employees during their employment and execution of their duties using company resources, such as any products, designs, programs etc., are the property of the company and nobody may make any claims against the company regarding this matter.

We expect our employees to be aware that any correspondence, written materials, documents or records, special process information, regulations, company’s private work flow information – confidential or not confidential – are the property of Ülker Bisküvi and its associates and must remain within the structure of the company.

We stipulate that our employees comply with all rules and laws regarding software licenses, patents and copyrights, and in order to enable them to conduct their work, we legally supply all necessary software and copyrights. Employees should not use our account illegally.

Product and service quality

We act in accordance with the legislation of the countries where we conduct our activities and contribute to the establishment of legal regulations aimed at providing product quality and consumer wellbeing.

We conduct our activities in accordance with such national quality standards such as Türk Standardları Enstitüsü (TSE), International Organization for Standardization (ISO), Hazard Analysis and Critical Control Point (HACCP), BRC Global Standards (BRC) and implement all our quality certificates together with our employees.

As a leading company, our ethical approach is to use technologies that will contribute to the lives of individuals, support their higher standard of living and to manufacture products benefitting from such technologies.

We do not use any additives in our food products that are legally defined as hazardous to healthcare and we clearly list the ingredients of our products on the packages.

We provide our consumers with easily accessible high quality products and strong brands along with the best service.

Abuse and Irregularity, Inappropriate payments, bribing and corruption

We clearly forbid any bribery, deceptive behavior or any unethical behavior to cause unearned gain in the countries and business areas where we conduct our activities.

In business relations for whom our employees are responsible, we compel our employees to act in accordance with relevant laws or regulations, to avoid partnership with parties that violate such laws and regulations, and to abstain from any means that are deceptive, wrong or unethical.

We commit that no penalty will be imposed to Ülker Bisküvi employees for not bribing.

Violating the principles with regards to bribery will result with the termination of labor agreement.

Facilitation payment and any payments to speed up the business or transaction by the employees of Ülker Bisküvi is strictly prohibited.

All the employees in Ülker Bisküvi, agents, brokers, consultants, distributors, any partners in the JV’s in the globe are included and act in accordance with the standards mandated by Ülker Bisküvi with regards to bribery and corruption.

We do not allow our employees to use their authority for their personal gain and/or for the benefit of

their relatives or to use their authorities carelessly, which could cause harm to Ülker Bisküvi.

We do not allow our employees to gain any direct or indirect personal profit from purchase and sale activities, any transactions and agreements where Ülker Bisküvi is a party.

We expect our employees to immediately notify their managers and/or the Ülker Bisküvi Ethical Board in case of any irregularities of such sort in any business relations.

ACCURACY IN RECORDS AND FINANCIAL REPORTING:

Accurate and complete record keeping

It is essential in Ülker Bisküvi and its associates that all records are kept in accordance with the legislation of the country.

The documents of the commercial and financial transactions must reflect the real situation.

No payment used outside this purpose shall be made or approved.

Presenting accurate information and financial reporting to all necessary parties

In all their services and transactions, Ülker Bisküvi and its associates provide accurate, complete and timely information transfer to all investors, customers, suppliers and official authorities in accordance with the legislation.

ADVERTISING AND PROMOTION

Ülker Bisküvi and its associates do not provide deceptive or misleading advertising or make false statements in their sales and marketing activities.

Our advertising does not contain any gender, religion or race discrimination or any elements of individual humiliation and violence.

COMPLIANCE RESPONSIBILITY AND NOTIFICATION OF VIOLATIONS

When Ülker Bisküvi employees need any guidance regarding Code of Conduct, they should consult the following:

- Relevant ethical behavior guide,
- Senior manager, human resources manager,
- Ethical Board (etik.bildirim@ulker.com.tr).

They must report any action or situation believed to be violating the ethical rules as follows:

- In written form to the Chairman, or
- To the Ethical Board (etik.bildirim@ulker.com.tr) or

Although signed notifications of ethical violations are preferred, anonymous notifications of ethical violations shall also be taken into consideration.

The evaluation of the ethical violation shall be conducted by the Ethical Board and the opinion of the relevant support department (Legal, Internal Auditing, Human Resources, etc.) shall be requested when necessary.

All notifications shall be kept confidential. The notifications shall be reviewed by the Ethical Board and appropriate actions/precautions shall be taken in accordance with the Board decision.

Ülker Bisküvi is determined to protect the rights of employees notifying the Ethical Board.

No retaliation shall be allowed against employees who notify any ethical violations and those attempting to retaliate shall be pursued accordingly.

We expect our employees to adopt attitudes in accordance with an awareness of their responsibilities and work ethics and always act consistently in accordance with the meaning and purpose of the Code of Conduct.

Corporate Governance Committee controls and goes over the practices and their compliances with the Code of Conduct, and determine the required improvements in Code of Conduct and present to the Board of Directors annually.

ÜLKER BİSKÜVİ CODE OF CONDUCT

All of our employees are expected to live up to the ethical conduct described in the “Ülker Bisküvi Code of Conduct” booklet, by promising the following:

I promise:

- Adopt the vision, mission and values of my company as my own,
- Conduct my work according to the law, all regulations and professional standards, as well as the ethical principles of Ülker Bisküvi,
- Respect the rights, individual differences and personal characteristics of others,
- Conduct myself according to the company’s environmental, health and security regulations,
- Refrain from using all alcoholic and narcotic substances in the work place which may affect my work performance,
- Refrain from subjecting any person (coworker, customer, supplier, etc.) to discrimination, ostracism, intimidation or any other psychological harassment,
- Refrain, during work hours, from using the name of the company, my position in the company my job title or the company’s resources for any political activities,
- Carry out my work to the best of my ability in ways that do no harm to people, the health of the community and the environment,
- Conduct all activities and business equitably, with no expectation of benefit from any public and corporate institution, civilian organization or political party,
- Behave in an honest and fair manner when conducting relationships with our suppliers and business partners,
- Refrain from practices that are unfair or deceitful when dealing with our customers and consumers,
- Abide by current laws and statutes governing the rules of fair business practices in all foreign countries where our activities are conducted,
- Direct any enquiries from the media regarding the financial status of Ülker Bisküvi and any of its subsidiary companies, or requests for information about the sector, to the corporate communications department, which has the authority to answer such questions,
- Refrain from taking a job with any supplier of the company of which I am an employee,
- Refrain from lending money or making any investment to the suppliers,
- Refrain from giving or accepting gifts of money or any item that may be exchanged for money, which may affect the impartiality or decision-making of the customers or suppliers of Ülker Bisküvi and its subsidiary companies,
- Abide by the company guidelines of any company concerned, with regard to receiving or giving gifts,
- Act in accordance with Public Disclosure Policies and Regulations,
- Refrain from profiting personally from any special advantages or conditions extended by Ülker Bisküvi to its suppliers or customers of the company,
- Refrain from working full-time for an organization not associated with the company, with which I am employed,
- Pay all applicable fees that are required by any foundation, employer union and similar civilian institutions where I work on behalf of my company,
- Report in writing, within one month, the appointment of a first degree relative to a critical position with any competitor company,
- Refrain from sharing confidential information publicly undisclosed to third parties, either for their personal interest for the interest of anyone outside the company,
- Act in accordance with all laws and regulatory judgment and company policies with regard to the laundering of illicit money and the fight against corruption,
- Only utilize the equipment, systems, resources and assets of the company to conduct the business of the company or for purposes for which permission from management has been obtained from management,
- Disclose confidential information that I possess only within the framework of the law and ethical rules of the company,
- Abide by the rules and laws governing the licensing of software, patents and author’s royalties,
- Refrain from utilizing any additive substances that have been determined by law to be detrimental to human health, in any food products,
- Refrain from obtaining any personal profit that may result from any processes and agreements from the procurement or sales activities of Ülker Bisküvi.

I swear that I will adopt the ethical and business principles listed above and further promise to conduct myself in accordance with the rules contained in the "Úlker Bisküvi Code of Conduct" booklet. I also agree and certify that, if I fail to conduct myself according to these ethical principles and business guidelines, my employment agreement may be terminated.