ÜLKER BİSKÜVİ SANAYİ A.Ş. SUPPLY CHAIN POLICY

As Ülker Bisküvi Sanayi A.Ş., we are working towards leaving a healthier and happier world for future generations by placing a sustainable approach at the core of our method for conducting business. We embrace an approach that is not just limited to our own operations, but also includes our suppliers. Production which is respectful to the environment, employees and the community is very important to us, and we encourage our suppliers to develop a similar approach.

The Ülker Bisküvi Supplier Chain Policy (the Policy) defines the environmental, social and ethical responsibilities that we expect from all suppliers that provide Ülker Bisküvi with products and services. We expect our suppliers to comply with the Policy, and to convey the Policy to their employees and suppliers. The Policy is included in all supplier contracts globally and we select our suppliers among companies that comply with the Policy.

The Policy has been developed based on the International Labor Association (ILO), the United Nations Global Compact, the United Nations Convention on the Rights of Children and national laws.

Child Labor

Suppliers must comply with the minimum legal age limit and not employ children under the age of 15 (in certain developing countries 14) specified in the ILO Convention 138. Young workers above the minimum age must be protected from all factors at the workplace that could affect their social, physical and emotional development and health and their education must not be obstructed.

Forced Labor

Employment must be voluntary. Suppliers must not, under any circumstances, benefit from forced labor and practice physical, sexual, psychological or verbal abuse against their workers, and resort to any unlawful practices like confiscating their identification documents.

Fair and Equal Treatment

Suppliers must not discriminate in employment or in the work environment based on gender, ethnicity, religion, race, nationality, age, physical capacity, pregnancy, marital state, union membership, political views etc. A working environment in which employees are respected and valued must be established. There should be no tolerance for any form of harassment and abusive treatment.

Freedom of Association and Collective Bargaining

The rights of all employees to associate and conduct collective bargaining must be respected. No pressure should be placed, and no discrimination should be practiced against employees who exercise this right.

Working Hours and Wages

All employees must have legal working permits and be under contract. A fair wage must be paid at least on the same level as minimum wage, and the payments must be regular and on time. There must be no discrimination involved in remuneration. All benefits like legal leave, severance, overtime

and other rights must be provided in the framework of legal requirements. The working hours and overtime must comply with laws and sector standards.

A Safe and Clean Working Environment

The suppliers are responsible for providing their employees with a safe, healthy and hygienic work environment. All of the necessary controls and maintenance must be conducted, safety procedures must be complied with and protective equipment must be provided to reduce any work related accidents and illnesses to a minimum. The necessary occupational health and safety training must be provided in this scope and any accidents and the measures taken as a result must be recorded. All applications must be in accordance with the national laws and regulations that are in force.

Protection of the Environment

The suppliers should comply with the applicable environmental laws and. The necessary environmental permits must be obtained, and they must be legally compliant. Suppliers must make an effort to keep their consumption, their carbon and other air emissions, their use of natural resources and their generation of waste to a minimum. Chemical storage, transport and use should be compliant with the regulations and in a way that does not damage the environment. The disposal of waste and discharge of waste water must be done in accordance with environmental requirements and limits. The environmental impacts of operations must be considered in decision making processes.

Quality and Food Safety

Products and services must be in accordance with the quality and safety standards set forth in relevant laws. Food safety and quality rules and the Ülker Bisküvi Quality Standards must be observed.

Ethical Principles

Suppliers must comply with all the laws and regulations that they are subject to, and they must keep their records transparent and up to date to prove that they are in compliance with relevant regulations.

Suppliers must show no tolerance for corruption and bribery; they must not give or receive any gifts or payments for the purpose of gaining benefit or facilitating a process. They must create mechanisms and policies to combat corruption and bribery. Situations that could create a conflict of interest must be avoided, and the intellectual property rights of business partners must be protected.

Reporting Policy Violations: Our stakeholders may report any situations in which it is suspected that laws, regulations and the Ülker Bisküvi Supplier Chain Policy have been violated by telephone or over the web. All reports will be handled confidentially and identities will be kept confidential to the extent allowed by laws. Violations may be reported to Ülker Bisküvi through the following channels:

Website: http://www.ulker.com.tr/tr/bilgi/iletisim

Phone: 0 (212) 567 15 67 (pbx)