

ÜLKER BİSKÜVİ SANAYİ A.Ş. HUMAN RIGHTS POLICY

and

GUIDING PRINCIPLES

SCOPE

At Ülker Bisküvi A.Ş. (Ülker) our vision is to contribute to economic, environmental and social sustainability. We are committed to respecting human rights in all our activities. We strive to provide a work environment that respects human rights in accordance with international standards, where employees can develop themselves, express their opinions freely and will not be exposed to discrimination.

Ülker Human Rights Policy (Policy) is based on The Universal Declaration of Human Rights, The United Nations (UN) Global Compact, The UN Convention on the Rights of the Child, International Labor Organization (ILO) Conventions, and OECD Guidelines for Multinational Corporations, UN Guiding Principles on Business and Human Rights and national laws.

This policy sets out the principles of responsibility for human rights in Ülker's activities and business relations, and covers all operations and production facilities of Ülker. The policy is included in contracts made with partners, suppliers and third parties.

FUNDAMENTAL PRINCIPLES

- We respect fundamental human rights defined in UN Universal Declaration of Human Rights and carry out our activities in in line with these principles.
- We comply with the principles of non-discrimination, elimination of child labor and forced labor, right to collective bargaining and freedom of association, laid down in the ILO Declaration of Fundamental Principles and Rights at Work on the and pay attention to the requirements of international human rights and social justice treaties to which Turkey is a party.
- We respect and practice the rights recognized by law in the countries of operation.
- We do not get involved in initiatives that could result in crime or infringement of rights in the countries we operate in, and we expect our managers and employees to comply with this.
- We do not discriminate based on gender, ethnicity, religion, race, nationality, age, physical capacity, sexual orientation, marital status, union membership, political opinion. and we also do not tolerate discrimination in processes such as recruitment, training and promotion. We manage these processes transparently and according to the skill, experience and performance.
- Within the legal framework and regulations, we support our employees' rights of freedom of association, assembly, and collective bargaining, and we respect freedom of expression. We do not subject our employees who use these rights to any form of discrimination.
- The "zero incident" goal is the foundation of our occupational health and safety approach. We are committed to providing a safe working environment for our business partners and employees; we take all the necessary precautions to ensure that our employees have the necessary knowledge and

equipment in scope of the Occupational Health and Safety Legislation.

- We are committed to providing all our employees a safe work environment free from all kinds of ill-treatment, mobbing and harassment. We encourage our employees to report the situation using their right to freedom of expression if they encounter such situations.
- We comply with the working hours and overtime provisions as determined by applicable laws and regulations in the countries of operation.
- We respect the rights of local communities in the regions or countries where we operate.
- We contact government authorities in our operation regions or countries, in case human rights are at risk.
- We communicate the rules identified by international human rights policies to our employees during our annual trainings.
- We develop our procurement processes to select our suppliers in accordance with the Ülker Bisküvi Sanayi A.Ş. Supply Chain Policy and the Policy.
- We carry out activities to identify and mitigate potential human rights risks that may arise through our activities.
- We define the possible human rights issues that may arise, and the groups that will be most affected by these problems through our activities.
- In the case that we have any negative effect on human rights, we try to mitigate these effects.
- We develop formal and informal grievance mechanisms to compensate the infringement of rights made by the Company.

EXPECTATIONS FROM OUR STAKEHOLDERS

- Our managers, our employees and those acting on the behalf of Ülker are required to comply with the Policy and to report any violations or possible violations to their associated managers and/or notify through company grievance channels.
- We expect our suppliers and business partners to comply with the Policy.
- We encourage our stakeholders to provide feedback on the Policy.

CODE OF PRACTICE

The policy is an integral part of the sustainability approach of Ülker, and has been translated to the languages of operation regions.

This Policy has been put into effect after being approved by the Board of Directors.

The policy is reviewed by the Ethics Committee at least every five years and the progress of the implementation is monitored. The Ethics Committee must review the Policy if there is any feedback

from stakeholders without waiting for the time period mentioned above. In the case that significant changes are made to the products, services and activities, a review is carried out without waiting for the time period mentioned above.

Issues that carry the risk of contradicting with the policy or obstructing implementation of the Policy in all other policies, procedures, processes, practices, products and events are reviewed.

The risks of non-compliance with human rights are classified as those that can be triggered by Ülker, those that may be influenced by Ülker or those Ülker may be subject to, and practices are developed to reduce these risks. The human rights risk area, the measures taken and improvement steps are shared in a transparent manner in the annual reports.

In the case of policy violations or complaints about human right issues may result in disciplinary action including termination of employment after an inspection. Policy violations can be reported using one of the following channels. These disclosures must comply with the laws on protection of personal information in the countries concerned.

Website: <http://www.ulker.com.tr/en>

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