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KEREVİTAŞ GIDA SANAYİ VE TİCARET A.Ş.

ETHICAL PRINCIPLES PROCEDURE

Prepared by : Human Resources

Approved by : Board of Directors

Tercüme edilmek üzere bana verilen Türkçe asıl belgenin İngilizce tercümesini doğru olarak yaptığımı beyan ederim. Emin Erdem Yavuz Sahrayıcedit Mah. Feritbey Sok. Avrupa Plaza No:1-3 K:2 D:6 Sahrayıcedit / İstanbul	Bu Tercümenin belirtilen adreste bulunan Yeminli Tercümanımız Emin Erdem Yavuz tarafından Türkçe'den İngilizce'ye tercüme edildiğini onaylarım. İki bin yirmi iki yılının Kasım ayınıngünü
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1. PURPOSE

KEREVİTAŞ Gıda Sanayi ve Ticaret A.Ş. ("**KEREVİTAŞ**" or the "**Company**") carries out its activities within the framework of the "Regulation of Yıldız Holding Global Honor and Ethics Committee" ("**Regulation**") and this Procedure of KEREVİTAŞ Code of Ethics prepared by the Board of Directors and disclosed to the public through its website.

KEREVİTAŞ Code of Ethics is a set of essential rules established for the purpose of regulating internal relations and the relations of the Company and all employees with customers, suppliers and other stakeholders, increasing service quality, efficient use of resources and preventing unfair competition.

The ultimate goal of KEREVİTAŞ Code of Ethics is to put our code of conduct in writing and to raise the awareness of our employees and stakeholders in order to create a common corporate culture on business ethics as a socially responsible organization. In this direction; it is aimed to guide KEREVİTAŞ employees and those acting on behalf of the corporation to act in accordance with the laws and business ethics in the decisions they will make and the behaviors they will show while performing their duties.

2. SCOPE

The Code of Ethics is integrated with the Company's policies, values and principles and covers KEREVİTAŞ and its subsidiaries ("**KEREVİTAŞ Group**"), employees, members of the Board of Directors, suppliers and business partners, intermediaries, contractors, vicarious agents and all third parties with whom business is conducted.

Yıldız Holding Global Honor and Ethics Committee Regulation is an integral part of this Procedure.

3. RESPONSIBILITY

The Corporate Governance Committee is responsible for the preparation and updating of this Procedure in consultation with Human Resources and Yıldız Holding Global Legal Affairs Department, and approval of this Procedure is the responsibility of the Board of Directors.

4. APPLICATION PROCEDURE

4.1. CODE OF ETHICS

4.1.1. Compliance with Regulations

- KEREVİTAŞ ensures the highest level of compliance with all national and international rules, especially legislation, and internal regulations.
- KEREVİTAŞ ensures that all financial reports, financial statements and records are kept in accordance with national and international accounting standards.
- In its relations with investors, stakeholders and all stakeholders, the Company acts in accordance with all applicable laws, regulations, rules, principles and internal regulations as well as international legal rules and ethical values without discrimination.

4.1.2. Confidentiality of Information and Protection of Trade Secrets

- Confidentiality of all commercial and personal information regarding our employees, suppliers and business partners, customers and consumers is essential. In the course of processing such private and confidential information as required by business and duty, the relevant laws, legislation and regulations are complied with in accessing and using such data, and such data is shared only with authorized persons. Such data are not to be disclosed to third parties unless disclosure is mandatory for official authorities and legislation.

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- Information and documents provided by the Company that are likely to be accessed or learned, trade secrets, financial and other information not disclosed to the public and confidential information contained in agreements made with third parties are evaluated within the framework of confidentiality and protection of trade secrets.
- The Company endeavors to protect the personal information of its employees and all stakeholders. The company pays maximum attention to data confidentiality and security issues when using all kinds of information technology resources and electronic communication tools, acts with the awareness that the confidentiality of passwords, codes and user logins used to access information is the responsibility of the user, and is not shared with colleagues or third parties, including managers.
- Personal data of employees are confidential and cannot be disclosed to anyone other than authorized persons. Employees may receive personalized information about themselves. The personnel who receive such personalized information, after reading this information, store it in a way that no one can get their hands on it and do not disclose it to anyone.
- Employees are aware of the confidentiality of the information they obtain as part of their duties and act accordingly. In case of any doubt about the degree of confidentiality, the opinion of the manager is sought. This information cannot be changed, copied or destroyed. Necessary measures are taken to ensure that information is kept carefully, stored and not disclosed. Work desks are cleared before the end of working hours and any confidential information/documents are locked and keys are kept in safe places. Any data, information and documents that may damage the activities and reputation of KEREVİTAŞ Group, put it in a difficult situation in terms of competition, and violate the confidentiality of private information are not taken out of the company via e-mail and other communication tools. Sharing documents, papers, reports or studies that do not bear the "Not Confidential" statement with third parties is strictly prohibited. However, there may be exceptions with the approval of the Chairman of the Board of Directors. Passwords and user logins are kept confidential and not disclosed to anyone other than authorized users. All kinds of information may be burned onto CD/USB only when the work requires it and with the written approval of the managers. Confidential information is not discussed in elevators, service cars and similar public places.
- Company and customer information cannot be disclosed to anyone even after leaving KEREVİTAŞ and cannot be used against KEREVİTAŞ. Every employee has a duty to establish, protect and defend our company's intellectual property rights over anything commercially important and to ensure that these rights are used responsibly.
- In the event that employees leave the Company for any reason, the Company takes care to protect all kinds of documents, documents and confidential information they have due to their duties and positions and to take the necessary measures to prevent them from being used against the Company in the future.
- Employees pay attention not to use critical information belonging to KEREVİTAŞ and Group companies while using mobile devices and talking in public and social areas.
- Company employees may from time to time have access to insider information specified under the capital markets legislation. Employees who receive insider information are required to treat such information confidentially within the framework of the provisions of the employment contract and/or confidentiality agreement they have signed and other internal regulations and procedures.
- Company employees may not disclose or use for their own benefit any inside information they learn during their work at the Company, unless authorized by the Company. Company employees are informed about the obligations set forth in the relevant legislation regarding insider information and the sanctions related to the misuse and improper distribution of such information.
- Obtaining benefits from this information by employees through stock exchange or any other means is unacceptable. These obligations of employees continue after they leave their duties. No Company employee may trade in the shares of the Company or its subsidiaries or affiliates based on insider information.

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- All official disclosures are communicated to investors, shareholders and the public in a complete, simultaneous and comprehensible manner, in line with the principle of equality, within the framework of the Disclosure Policy, through the persons and/or units assigned and authorized by the Company.
- From the day following the end of the accounting period in which the 6 and 12-month financial statements and reports and independent audit reports are prepared by the Company until the public disclosure of these statements and reports in accordance with the legislation is called the "Silent Period". During the silent period, except for the information disclosed to the public by the Company officials on behalf of the Company, no comments can be made on the Company's activities, financial performance or financial outlook and no questions of capital market participants can be answered. However, this period does not prevent Company officials from participating in conferences, panels and/or seminars. No transactions may be made in the Company's capital market instruments during this period by persons who possess inside information or continuous information, or by their spouses, children or persons living in the same household.

4.1.3. Compliance with Corporate Governance Principles:

- KEREVİTAŞ informs Company employees about the Corporate Governance Principles, ensures their adoption within the Company and oversees full compliance with these principles.
- Ensures that all kinds of information provided to the public is understandable, accurate, clear, timely, and complete.

4.1.4. Employees

- KEREVİTAŞ upholds the principles contained in the Guidelines for Multinational Enterprises issued by the OECD and complies with the International Labor Organization (ILO) declarations on freedom of collective bargaining and association, prohibition of forced and child labor, and discrimination.
- KEREVİTAŞ respects human rights, individual differences and personal characteristics of people and supports the United Nations Universal Declaration of Human Rights. The company repudiates the use of child labor in violation of ILO principles and does not work with any supplier or subcontractor that uses children as labor in violation of ILO principles.
- KEREVİTAŞ places great emphasis on creating a safe, healthy working environment free from all forms of verbal and physical harassment based on race, ethnic origin, religion, physical or sexual characteristics, sexual orientation or any other legally prohibited factor.
- The company acts honestly and fairly and provides equal opportunities to all employees and job applicants in their relations with KEREVİTAŞ, regardless of their race, religion, gender, sexual orientation, age, nationality, origin or marital status, pregnancy, disability or invalidity.
- Individuals who fail to successfully complete the required exams and interviews cannot be discriminated against in any way during the recruitment process.
- In addition, any behaviors that may emerge in terms of age, language, race, health status, gender and marital status, and behaviors arising from acts of sexual harassment by words, physical contact or behaviors are evaluated by the Disciplinary Committee.
- The Company develops measures to prevent "Mobbing" practices, which are defined as intimidating employees by harassing them through psychological violence, pressure, siege and harassment, and to protect our employees from such treatment. Special importance is attached to the protection of the personality of our employees and it is not allowed to violate their personality values through all kinds of psychological pressure and harassment, to wear them down with emotional attacks and to subject them to intimidation, regardless of who they come from.
- Employees may not actually work or provide consultancy in any paid or unpaid job, under another employer and/or within another legal entity, even outside their working hours, "without the written consent of the Employer".

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- KEREVİTAŞ employees may not directly or indirectly perform activities entailing being considered as a "merchant" or "tradesman", may not directly or indirectly establish a company, may not be a partner, board member or manager in established companies, may not be a business partner, may not work in companies with which they have a competitor or business relationship. Employees can take part in charitable, non-profit organizations when it does not interfere with his/her duties within the company.
- Employees are supported in non-work social activities that will enrich their social lives.
- Where human rights are at risk in the regions or countries where we operate, we contact government authorities.
- We accept solidarity with employees and their families as essential under extraordinary circumstances such as natural disasters.
- Employees may deliver speeches and write professional articles on topics that do not concern KEREVİTAŞ and do not contradict its policies. As an employee, one should always avoid behavior that may harm the company's reputation, even if the issue is not related to KEREVİTAŞ. Written approval must be obtained from the Chairman of the Board of Directors in order to use the name KEREVİTAŞ in these activities.
- The rights of workers to organize and bargain collectively are respected.
- Employees may not provide material and immaterial aid to political activities on behalf of KEREVİTAŞ, even for their financial means. Employees may not be active in any political party during their term of office. Managers may not ask their employees to do political work or become a member of a party.
- Employees may make personal material or immaterial aid, donations, or take part in charity associations for third parties other than KEREVİTAŞ.
- The company takes care to employ the appropriate number of employees for each job, and ensures that they are aware of working hours. Being aware of the importance of the use of annual leave by each employee, the company ensures that leave use takes place regularly.
- The company takes care to fulfill the rights of employees that may arise due to the legislation in a timely and complete manner.
- It ensures employee participation in the decision-making process.
- Employees may, subject to the approval of the Chairman of the Board of Directors and provided that they do not interfere with the flow of business and do not violate the principle of confidentiality, give a statement to any media organization, conduct an interview, participate in a seminar, a conference, etc. as a speaker or trainer, and donate the proceeds of the event to a foundation deemed appropriate by the Chairman of the Board of Directors. However, they can only receive gifts such as trophies, awards, etc. that are given to commemorate the day and have symbolic value.
- As a food company, we recognize that workers have a right to taste freely what they produce and we ensure that.
- Employees are expected to communicate and cooperate with each other within the framework of mutual trust, respect and courtesy.
- Employees are not allowed to use and/or be under the influence of substances harmful to human health such as illegal drugs, alcohol, narcotics, etc. in the Company's work areas, while performing Company business, using Company-owned vehicles and equipment.

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- It is strictly forbidden to engage in gambling, betting and games of chance in the workplace and during working hours. Individuals with addictive habits in the workplace and outside working hours are not to be worked with.
- The Company does not interfere with the personal information and private life of its employees. Information belonging to the personnel is only used for the purposes of the Company by authorized persons within the scope of the authorizations determined in case of need.
- Employees have an obligation to declare the information requested from them by the Company Human Resources Department accurately and to update it when necessary, and to inform their managers and the Company Human Resources Manager of any investigations initiated by the Public Prosecutor's Office and/or criminal cases filed against them for any reason other than their duties or duties in Group companies.

4.1.5. Responsibilities to Stakeholders

- KEREVİTAŞ adopts its decisions based on recognized economic criteria and manages its resources and assets in the most efficient manner with an understanding of financial discipline and accountability.
- The Company aims to maximize shareholder value and implements growth-oriented value-creating strategies by avoiding unnecessary and unmanageable risks.
- Based on commercial and financial discipline, we develop and realize an honest, transparent and sustainable reporting system that complies with legal regulations and rules. We regularly provide information to the necessary persons, institutions and organizations. We provide timely, complete, accurate and understandable information about our financial statements, strategies and investments in our public disclosures to the public and our shareholders, within the scope stipulated by the legislation.
- It conducts its activities in a way to distribute dividends to its stakeholders in accordance with its profit distribution policy.
- All meetings to be held with investors, financial analysts, members of the press and similar groups are conducted within the framework of the Company's "Disclosure Policy".
- Except for the persons and/or departments assigned and authorized, no employee may make verbal or written statements on behalf of the Company.

4.1.6. Relations with Customers/Subcontractors, Suppliers and Other Companies and Persons the Company has Commercial Relations With

- With respect to customers, subcontractors, suppliers, business partners, we take all necessary technical and administrative measures to ensure the appropriate level of security in order to prevent unlawful processing of personal data and unlawful access to personal data and to ensure the protection of personal data in accordance with the Personal Data Protection Law No. 6698.
- KEREVİTAŞ conducts its relations with its customers, suppliers and business partners in an honest, fair and sensitive manner and strives to create a trust-based relationship with its customers by producing fast and permanent solutions, and we execute product/service agreements in compliance with the relevant international and local legislation and internal regulations.
- At KEREVİTAŞ Group, we pay attention to making decisions in line with objective criteria in the selection of our suppliers and business partners with whom we prefer to work in a long-term cooperation.
- When we establish and conduct commercial relations, we take as basis criteria such as cost/benefit, which are objective, transparent, equal, independent, in line with our corporate values and in the interest of our third-party stakeholders, without being influenced by any interest relationship and/or person.

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- In relations with customers, no transaction may be made without the customer's knowledge, even in favor of the customer. No exploitation of customer weaknesses, even if in favor of KEREVİTAŞ, shall be made and no profit shall be sought by providing incomplete or incorrect information to the customer.
- Protects the rights of its customers, takes into account their objections and complaints, and endeavors to resolve them immediately by making the necessary examinations and evaluations. In case the KEREVİTAŞ employee cannot resolve the complaints within his/her own area of duty, he/she informs his/her manager.
- No private business relationship may be entered into with the Company's customers/contractors, suppliers and other companies and persons with whom the Company has commercial relations, no money/goods may be borrowed for personal purposes and no money/goods may be lent to the customer/contractor/supplier and other companies and persons with whom the Company has commercial relations. Purchasing and/or requesting personal goods or services from customers/subcontractors/suppliers and other companies and persons that the company has commercial relations with free of any compensation is considered as procurement of interest and requires the penalty of termination of employment.
- We share the KEREVİTAŞ Code of Ethics handbook with our suppliers, subcontractors and business partners.
- We expect our suppliers, subcontractors and business partners to adhere to KEREVİTAŞ Code of Ethics and Working Principles, share the same values and act within this framework.
- We require our suppliers, subcontractors and business partners to carry out their activities in compliance with the Code of Ethics and relevant laws and regulations, to observe the rights of their employees and to comply with standards such as environmental protection, etc.

4.1.7. Relations with Competitors

- KEREVİTAŞ and Group Companies act in compliance with the Law on the Protection of Competition and all relevant legal regulations, and behave meticulously to ensure the freedom of competition and the development of the sector, to protect common interests and to ensure the continuity of trust in the sector. Fair competition conditions are observed in our relations with rival companies.
- Violation of the rules on competition can result in high financial penalties and/or possible imprisonment, both individually and corporately. All KEREVİTAŞ Group employees observe and comply with all applicable laws, regulations, decrees and orders related to the protection of competition.
- KEREVİTAŞ and Group Companies resolutely avoid any agreements, conduct, and concerted practices with competitors or other third persons or entities that directly and/or indirectly aim to prevent or restrict competition or that have or may have the effect of preventing or restricting competition.
- A dominant position in a particular market, either alone or jointly with other undertakings, shall not be abused.
- Illegal and unethical means are not used to access information about our competitors. Only public information of rival companies is used; information from rival companies of unknown origin is not utilized.

4.1.7.1. Trade Associations

Meetings of trade associations and other similar bodies are also occasions where rival firms come together and discuss a variety of common concerns and interests that have the potential to go beyond the boundaries of competition law. For this reason, the meetings should be held with caution, and if conversations in any way drift towards attempts to restrict competition, they should be refused and the meeting should be abandoned.

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4.1.7.2. Commercial Intelligence

When commercial information related to other companies is obtained in any way, this information will be accepted only after it is concluded that receiving and using this information does not constitute a moral and legal problem and does not violate the confidentiality obligations of any person. Such information shall not be obtained by any unethical or illegal means, such as misrepresentation or misrepresentation, deception, theft, espionage or bribery, nor shall third parties be requested to do so.

4.1.8. State Institutions and Organizations

- The principle of equality is applied in relations with state institutions and organizations. Acting with the principle of keeping an equal distance from state institutions and organizations, non-governmental organizations and political parties while carrying out our activities is essential. There is utter compliance with the requirements of laws and regulations; no relationship of interest with public officials, political persons and their representatives, with or without material value.
- Attention is paid to share information that should be disclosed to the public in an accurate, consistent and timely manner, and sensitivity is exercised to protect internal information that should not be shared with the public.
- Relevant employees participating in contracts (tenders), contract negotiations, or contract preparations are accountable for the truthfulness and accuracy of all statements, correspondence, and representations made by them to interested parties.

4.1.9. Media / Social Media / Advertising and Broadcasting

- Regular, open and transparent communication is established and maintained with the media.
- No distinction is made between media institutions, all are kept at an equal distance.
- Disclosures to the media do not include information that may mislead the public. No employee or manager, other than the spokespersons of the organization, makes public statements. We do not include any statements that may damage the reputation of the organization and are incompatible with the corporate culture, and we never use discriminatory statements, political, hateful and insulting discourse.
- Our employees do not make posts on their social media accounts that praise crime and/or criminals. Employees are expected to share their posts about KEREVİTAŞ and Group Companies in all digital media, especially social media, in a manner befitting the corporate reputation.
- As KEREVİTAŞ Group, in no way misleading and deceptive advertising is made, and no discourse is made to damage the reputation of our competitors or the companies we compete with. Our advertisements do not incite the public to discrimination and violence, and advertisements contrary to the general rules of morality are not prepared and published. We also oversee that advertising and/or sales materials are not printed and distributed without the approval of the necessary units and managers.
- Financial or sector-related questions and information requests from the media about KEREVİTAŞ and the Group, are responded to in writing under the coordination of the corporate communication department authorized in this regard.

4.1.10. Asset, Resource and Time Utilization in Companies

4.1.10.1. Asset and Resource Utilization:

- Utilization of the assets and resources belonging to the KEREVİTAŞ Group in accordance with their intended purpose and in the interests of the Company, and avoidance of their use for personal or third party benefit is a general rule. The Company's tangible (cash and cash equivalents, stocks, company vehicles, machinery and equipment, electronic devices, etc.) and intangible (information and information systems, brand, reputation, intellectual property rights, trade secrets, etc.) assets and

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resources are used only to carry out the Company's business or within the principles and procedures authorized by the management.

- Company assets, facilities and employees may not be used for outside the company under any name whatsoever and on behalf of and for the benefit of whomever without the company's interest. The principle of "Saving in Everything" is practiced by all personnel in such a way that those in higher company roles set an example for their subordinates.
- Apart from using the assets and resources of KEREVİTAŞ and KEREVİTAŞ Group companies efficiently, our employees and stakeholders are also responsible for taking all necessary measures to protect the Company's tangible and intangible assets. They avoid behaviors and actions that may harm this responsibility and put the KEREVİTAŞ Group in a difficult situation (possible loss, damage, misuse, abuse, theft and sabotage of assets and resources, etc.) and act within the principle of "saving in everything" while performing their duties.

4.1.10.2. Effective and Efficient Use of Working Hours

- Working hours are determined by balancing work and private life. It is essential that our employees spend their working hours in an efficient and effective manner, aware of their duties and responsibilities.
- Employees do not engage in activities not related to their duties and responsibilities during working hours. Employees avoid all attitudes and behaviors, including gossip, that will negatively affect the workflow and disrupt the working order,
- They use their time well and do not spare time for personal affairs during working hours. Managers cannot assign employees for their personal business.
- It is fundamental not to accept visitors for personal purposes during working hours. Company employees are obliged to complete the interviews for mandatory visitors at a reasonable time in connection with the subject of the visit and in a way that does not interfere with the workflow.

4.1.11. Engaging in Activities Creating Conflicts of Interest

- Conflict of interest is a situation where employees have personal interests that affect or may be perceived to affect the impartial and objective performance of their duties. Its scope covers any benefits provided to them, their relatives and close relatives, or persons or organizations with which they are associated, and any other obligations, whether pecuniary or non-pecuniary, related to them.
- A material conflict of interest concerns an actual or potential financial gain. However, such financial gain does not necessarily have to be in cash. This includes earnings such as gifts and treats.
- In cases of intangible conflicts of interest, there is no material gain, but there is a personal interest. Trading in influence and use for the purpose of establishing reputation and connections can also be considered within this scope.
- While the possibility that the employee's behavior may be influenced is a sufficient condition for a conflict of interest, another criterion for determining a conflict of interest is that a third party looking from the outside may also think that the objectivity of the employee may be influenced by the situation in question.

4.1.11.1 Relations with Relatives

- If the candidate to be hired has a relationship of blood and affinity, including the 2nd degree, with the personnel working in the workplace, it is not accepted to work in the same departments or to be in a subordinate relationship. In addition, in cases required by the Employer's interests, working in the same departments or being in a superior-subordinate relationship is subject to the approval of KEREVİTAŞ Human Resources and the approval of the Chairman of the Board of Directors.

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- Employees may engage in business relations with their spouses, relatives and friends regarding KEREVİTAŞ only with the knowledge of the Chairman of the Board of Directors.

4.1.11.2. Receiving and Giving Gifts, Representation and Hospitality

- Employees shall ensure transparency during and after the identification of customers/subcontractors/suppliers and other companies and individuals with whom KEREVİTAŞ has commercial relations, and shall not request or insinuate gifts that may adversely affect their objective decision-making power; and shall not accept any gifts, money, checks, property, free vacations, special discounts that may put KEREVİTAŞ under liability.
- While gifts given to stakeholders at the end of the year and on special occasions and souvenir and promotional materials are not included in this scope; criteria such as "being moderate" and "not adversely affecting the reputation of the company in the eyes of our stakeholders or third parties" are taken as basis when receiving, giving gifts or representing and entertaining gifts that are within the scope of traditions and customs and whose value does not exceed a maximum of TRY 100.00.
- We act in compliance with the law and relevant regulations in the event of detection and proof of violations that may have an impact on the main activities and financial statements of KEREVİTAŞ Group Companies, cause violation of the relevant laws, damage the corporate image and/or provide benefits to the employee due to his/her position and duty in KEREVİTAŞ Group.
- As employees of KEREVİTAŞ Group, we are aware that it is essential that we do not demand any discount or benefit from KEREVİTAŞ Group Companies or real or legal persons with whom we have a corporate business relationship, which may be perceived as inappropriate, do not offer it to third parties, and do not accept it when offered. Other than that, we do not engage in any personal debt-credit relationship with third parties (our suppliers and business partners, dealers and authorized dealers and authorized services, etc.) who are directly or indirectly related to our duties.
- A representation costs allowance is reserved for the costs of entertaining customers and business meetings. We require that the costs of representation are used only in the areas to which they relate. We do not allow making passages between budget expenditure areas.
- It is essential for the made expenditures to be documented by invoices and it is not allowed to obtain an invoice from another place for any expenditures for which an invoice cannot be received. In cases where necessary, we ask for an expense voucher to be issued in accordance with the law. Non-recognized expenses (NRIs) are kept in non-recognized expense accounts and recorded in accounts receivable in the relevant companies.
- Business-related hospitality events are diligently supervised with the help of corporate standards and relevant internal regulations and approved by the company's senior management. Any entertainment expenditures other than these are not accepted.

4.1.11.3. Participation in Representation and Organization Events

Organizations open to general participation (conferences, receptions, promotional events, seminars, etc.) held by associations and non-governmental organizations with corporate membership may be attended by persons authorized to use the conditions of corporate membership, with the knowledge of their senior manager. Written approval is not required for this.

4.1.12. Anti-Money Laundering and Anti-Corruption

- Money laundering is the process and activities aimed at hiding, concealing or disguising the nature, source, location, condition, movement and to whom the cash and similar assets obtained from crime belong to in order to conceal their crimes or to give a legal appearance to the proceeds of crime.
- We, as KEREVİTAŞ Group, embrace the combat against money laundering, terrorist financing, corruption and similar crimes as an important principle within the framework of national and international legislation provisions. We obligate our employees to comply with all applicable anti-money laundering and anti-corruption laws and regulations.

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- KEREVİTAŞ has made it a principle to comply with anti-corruption laws and regulations, universal rules of law, ethical and professional principles, especially corporate governance principles and Donation Policy, other internal regulations of KEREVİTAŞ and other legal regulations in all countries where KEREVİTAŞ Group companies operate and are represented, since bribery and corruption is a legally punishable act, especially the Turkish Penal Code, as well as business ethics.
- All kinds of corruption and bribery that harm the reputation of KEREVİTAŞ Group and its employees are also dealt with meticulousness and sensitivity. Our employees are not allowed to demand from our suppliers and business partners, customers and consumers, competitors and other third party stakeholders to benefit from the special advantages and conditions granted to the Company for their personal interests, to demand special privileges or discounts other than those offered to everyone, and to request personal loans. Kerevitaş prohibits accepting and giving any bribes in any ways whatsoever, under the name of cash, commission, profit, and contribution by employees. An employee who refuses to give bribes shall not be retaliated against, any fines shall not be imposed.
- It is a fundamental principle that the employees and all third parties acting on behalf of the KEREVİTAŞ Group show due care and diligence; that they do not obtain any unfair gain from persons and organizations for any purpose whatsoever, that they do not offer, receive or give bribes or commissions, and that they prevent such acts to the extent they have information. In the event of such a proposal, any observation or suspicion of such a proposal, the situation should be reported to the line manager and/or the Code of Ethics Hotline.

4.1.13. Social/Community Responsibility /Environment and Health/Occupational Safety

4.1.13.1. Social Responsibility

- As KEREVİTAŞ, we operate with the understanding of creating shared value in our social investments.
- As part of our social responsibility approach, we support our employees to take part in volunteering and charity projects with the understanding of contributing to the development of society and creating value.
- Acting in compliance with business ethics and with a sense of social responsibility, the Company responds to the problems of society, takes part in projects that will contribute to the life and development of society, provides donation support, and contributes to social life by supporting cultural, artistic, scientific and sporting activities.
- Attention is exercised to ensure that our corporate donations and social support are not made to projects, institutions and organizations that may damage the reputation of KEREVİTAŞ Group, political activities and persons and organizations associated with these activities, private accounts and profit-seeking organizations. KEREVİTAŞ Group conducts all its activities in line with social benefit and respect for the environment.

4.1.13.2. Environment and Health

- We undertake all our operations and investments in harmony with the environment and evaluate the environment in terms of sustainable use of natural resources and minimizing the negative impacts that may occur in nature.
- Preserving nature in a manner compliant with environmental legislation is part of our responsibility to future generations in the long term. We continuously develop innovative solutions with the aim of continuously improving environmental performance; we work to use natural resources, especially soil and water, prudently and efficiently, to minimize carbon emissions and waste, and to increase recycling.
- We develop methods aimed to protect natural resources such as energy and water, and we carry out studies for the efficient use of energy and materials.
- We take measures to identify and mitigate risks for emergencies related to the environment and climate change.
- We create employee and subcontractor awareness by providing environmental trainings.

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- When performing our work, we comply with all occupational safety and health laws and standards.
- We implement "Risk Management" principles in order to create a safe and healthy work environment.
- We ensure and require the use of adequate protective equipment and safety precautions.
- We point out that implementing company policies and regulations on health and safety in the workplace is an important responsibility that all our employees should pay attention to.
- As a food company, we value the health of our communities and consumers.
- We comply with legal regulations on food safety and develop best practice techniques in cooperation with non-governmental organizations and the scientific community.

4.1.13.3. Occupational Health and Safety

- Managers and employees are committed to safety in the workplace.
- Employees are aware of their responsibilities in ensuring the safety of the company and all employees and fulfill their responsibilities.
- Against fire and similar natural disasters, everyone is made aware of the information provided in the trainings and announcements made by the Occupational Health, Safety and Environment Department and the instructions published are complied with.
- Ensuring the health and safety of our employees, customers, consumers and everyone who has a business relationship with our company is a priority in all our activities.

Detailed records are maintained on Environmental, Health, Occupational Safety training and violations as well as accidents. Information is shared with the public in detail in annual reports.

4.1.14. Marketing and Promotional Activities

4.1.14.1. Product Information Disclosure

- KEREVİTAŞ is committed to providing continuous and complete information about the use, safety, unexpected effects and side effects of its products and, if necessary, their operational characteristics and conditions. Such information is conveyed to the addressees through short product information/instructions for use and other promotional methods.

4.1.14.2. Product and Service Quality

- We abide by the laws and relevant regulations in the countries in which we operate, and support the development of product and market principles, standards and guidelines to ensure product quality and consumer welfare.
- We execute our operations in compliance with national quality standards such as the Turkish Standards Institute (TSE) and international quality standards such as International Organization for Standardization (ISO), Hazard Analysis and Critical Control Point (HACCP), BRC Global Standards (BRC), and we uphold our quality certificates with all our employees. Within the framework of our ethical approach; we, as a leading company, utilize technologies to contribute to the lives of individuals and support them to live better, and we utilize technologies to support them to live beneficially with these technologies, and we produce products that provide benefits with these technologies.
- We avoid the use of additives in food products that are harmful to human health as defined by law, relevant regulations and standards, and we clearly indicate the content of the products on their packaging.

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- We deliver high quality products and strong brands that are easily accessible to our consumers, with the best service.

5. Code of Practice, Compliance and Violations

We execute all our domestic and international activities and transactions within the framework of laws and international law. We prioritize accurate and timely communication in our relations with regulatory institutions and organizations. We carry out our operations within the framework of laws, regulations, and professional standards as well as the Kerevitaş Code of Ethics.

5.1. Ethics Committee

It is the responsibility of the Company's Human Resources Department, taking into consideration the recommendations of the "Yıldız Holding Global Honor and Ethics Committee" ("**Ethics Committee**"), to carry out all kinds of activities deemed necessary for the purpose of establishing, developing and maintaining an ethical culture; to establish, update, publish and ensure the applicability of the Code of Ethics, to coordinate training programs for those assigned and employees in this regard or to cooperate with expert organizations on these issues.

5.2. Acknowledgement

As an integral part of their employment contracts, employees working at all levels within the KEREVİTAŞ Group are informed about the Regulation and Code of Ethics and their respective responsibilities in relation to these principles, and an undertaking that the principles have been read and understood is kept in their personnel file by the Human Resources Department.

The Code of Ethics is also available on the Company's corporate website.

5.3. Code of Ethical Conduct Implementation Principles

The Code of Ethics outlines the processes that will be pursued in the event that attitudes and behaviors that contradict or violate the rules required for a harmonious and productive working environment within the KEREVİTAŞ Group arise, and determines the sanctions to be applied at the end of the process.

Employees are required to act with their personal conscience and common sense, in addition to compliance with laws and regulations, this Code of Ethics, and obligations arising from other Company procedures, policies and regulations.

5.3.1. Obligation to Report Violations and Code of Ethics Hotline

It is prohibited that employees use their authority and responsibility for their own benefit or outside of the care expected of them, causing damage to the company and customers, or attempting to cause damage even if no damage is caused, or directly or indirectly obtaining personal gain from the company's purchasing and sales activities and all other transactions and contracts to which the company is a party.

Employees are obligated to adopt the Code of Ethics and act within the framework of these principles while performing their daily work/transactions. Employees are entitled to consult their senior managers or the Human Resources Department about the Code of Ethics whenever they need to.

In addition, all employees wishing to communicate or consult in case of any doubt regarding the content of the Code of Ethics and/or in case of witnessing any behavior or practice contrary to the rules, can reach

- to the Code of Ethics Hotline by e-mail (etik.bildirim@kerevitas.com.tr)
- or by calling the Code of Ethics Hotline at any time of the day at (0850 209 1998).

These notification hotlines serve only for the purpose of reporting issues deemed to be non-compliant with the Code of Ethics, and requests such as customer or consumer complaints, suggestions, objections, etc. are not considered within the scope of the Code of Ethics Hotline activities.

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Confidentiality of the identity of the employee/persons who report the violation within the framework of legal/statutory and administrative requirements is essential. The rights of the employee(s) who report violations are protected. Any notifications found to be untrue or intended to deceive shall be removed from the process and sanctions shall be imposed on employees who deliberately do so within the framework of the Disciplinary Regulation.

All employees and managers approving, directing or having knowledge of behaviors contrary to the Code of Ethics, failing to make the necessary notification in an appropriate manner, condoning or permitting such behaviors are also subject to disciplinary action within the framework of the disciplinary regulation.

5.3.2. Review and Investigation Authority and Reporting of Violation Notifications

Notifications to the Code of Ethics Hotlines can be made via e-mail, phone or in writing in a sealed envelope.

It is preferred that a name is provided in the violation notification, but anonymous notifications will also be taken into account.

All notifications will be kept confidential. KEREVİTAŞ is committed to protecting the rights of its employees who make notifications for code of ethics. Retaliation against any employee for making a notification is not permitted and necessary actions will be taken against those who attempt to retaliate.

Any complaints, denunciations, and allegations received by the Code of Ethics Hotlines are prioritized and listed by KEREVİTAŞ and reported in writing to the Chairman of the Board of Directors by Human Resources. These are then reported to the Ethics Committee by the Chairman of the Board of Directors, taking the opinion of the relevant support unit (Legal, Internal Audit, HR, etc.), if necessary, for the grading of the violation.

The Ethics Committee is authorized and responsible for the assessment and resolution of incoming complaints, denunciations and allegations. In this regard, any violation of the Code of Ethics is reviewed by the "Yıldız Holding Global Honor and Ethics Committee". Necessary work, reviews, or investigations regarding complaints, allegations, and denunciations received by the Violation Hotlines are carried out within the framework of the "Regulation of Yıldız Holding Global Honor and Ethics Committee".

Accordingly, necessary reviews and investigations are conducted on behaviors and practices in violation of the Code of Ethics, either ex officio or upon applications to be made. In the event that any transaction or action in violation of the Code of Ethics is detected, the report on this situation or the result of the investigation that the behavior contrary to the Code of Ethics could not be detected is forwarded to the Chairman of the Board of Directors of KEREVİTAŞ.

Proper actions and measures are taken in line with the decisions to be taken.

5.3.3. Disciplinary Practices

The provisions of the Disciplinary Regulation shall apply to those who violate the Code of Ethics.

Non-compliance with laws and regulations, the Code of Ethics and other KEREVİTAŞ Group policies, procedures and regulations may lead to criminal consequences up to termination of employment.

6. TRAINING and PERIODIC ASSESSMENT

KEREVİTAŞ Code of Ethics and Working Principles are communicated to the personnel and necessary trainings are provided. Violations are regarded as a very important risk factor and zero-tolerance is the goal in its implementation.

Information regarding trainings is recorded and shared with the public in annual reports.

The implementation of this Procedure is monitored and regularly reviewed by the Corporate Governance Committee and submitted to the Board of Directors annually by determining the necessary updates to the Code of Ethics.

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7. ANNEXES and RELATED FORMS

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Statement for Code of Ethics

I hereby acknowledge and undertake that I have read, understood and agreed to comply with all the articles of the Code of Ethics.

Name-Surname:

Company:

Position:

Date:

Signature:

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