


AtaKey Patates Gıda San. Tic. A.Ş.	SOCIAL COMPLIANCE POLICY	
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**ATAKEY PATATES GIDA SANAYİ VE
TİCARET A.Ş.
SOCIAL COMPLIANCE POLICY**

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1.0 OBJECTIVE

The objective of this Social Compliance Policy (Policy) is to commit that ATKAKEY PATATES GIDA SANAYİ VE TİCARET A.Ş. (hereinafter referred to as "Atakey") will fulfill the principles based on the rules and regulations of the International Labor Organization (ILO) and adopted as corporate responsibility, and the processes implemented based on these principles, together with all employees and third-party stakeholders.

2.0 SCOPE

The aim is to make this Policy a part of the company culture; the Policy commits to implementing all rules arising from legal obligations and standards for employees and third-party stakeholders, complying with occupational health and safety rules, being environmentally sensitive, ensuring open and honest communication among employees, and creating a respectful and valued workplace. In this context, the Policy covers the following principles:

- Fair Wage
- Occupational Health and Safety
- Working Hours and Forced Labor
- Child Labor (Minor Employees)
- Ethical Business Conduct
- Right to Organize and Unionize
- Non-Discrimination
- Environmental Protection
- Employment Contract (Employer Contract)

3.0 RESPONSIBILITIES


All Atakey employees and third-party stakeholders are responsible for compliance with this Policy.

4.0 DEFINITIONS

Diversity: Diversity, in a general sense, refers to all differences belonging to individuals. Everything that makes individuals unique is part of the definition of diversity.

Inclusiveness: Inclusiveness in the workplace means the inclusion and acceptance of all people in the workplace, regardless of their differences and social identities. Inclusiveness involves bringing together and utilizing all differences and resources in a beneficial way.

Corporate Social Responsibility: It is a self-regulating business model that ensures that the company is socially accountable to itself, its stakeholders, and the public. It also means that the company acts ethically and responsibly towards society and carries out its business processes within this scope.

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Social Compliance: It is an indicator of how a business treats its employees and the environment, and how it applies the concept of social responsibility within itself and its areas of influence.

International Labor Organization (ILO): It is the United Nations' specialized agency on labor issues.

5.0 PRINCIPLES AND IMPLEMENTATION

5.1 Fair Wage


Atakey is committed to providing all its employees with remuneration in accordance with sectoral and local labor market conditions, internal and external wage balances. Practices are carried out in compliance with current laws and employment contracts regarding salary allowances, working hours, and fringe benefits. In the remuneration process; a fair and objective approach is adopted, and no tolerance is shown for language, race, gender, political opinion, any religious or philosophical belief, age, or physical disability to affect the remuneration process; no tolerance for discrimination is allowed under any circumstances, including this process. Within Atakey, the salaries of employees are determined according to their individual performance, skills, experience, and the nature of the work they do, and decisions regarding remuneration are made solely based on relevant job factors.

5.2 Occupational Health and Safety (OHS)

Atakey's priority is its human resources. Therefore, it is committed to determining and maintaining the most appropriate working methods to create a healthy and safe working environment, and to consider OHS performance in all processes in line with both national and international legislation. Atakey aims to create and maintain a workplace environment where employees can work safely, healthful, and efficiently, away from accidents, injuries, and health hazards. With this approach, all stakeholders are encouraged to show the same care for the continuity of a culture that embraces a healthy and safe working environment. OHS trainings are provided to personnel within the timeframes stipulated by the legislation in order to reduce health risks that may be encountered in the working environment.

5.3 Working Hours and Forced Labor

Atakey prohibits all forms of forced labor and inhumane working conditions. Working hours are regulated in accordance with the Labor Law No. 4857 and the working hours specified in the said Law are taken as a basis. Employees are granted rest and holidays within the framework of their legal rights. In cases where overtime work is required, employees are not allowed to work without their consent. If the employee wishes to quit their job, the company does not prevent this and ensures all remaining rights of the employee. Strict policies are implemented against inhumane practices or working standards such as forced labor or bonded labor, preventing the employee's freedom of thought and expression, forcing overtime work, or withholding documents required for work (financial or personal documents such as passports).

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5.4 Child Labor (Minor Employees)

Atakey applies the minimum age provisions of applicable laws and standards. Employment of persons under the age limit stipulated by the Labor Law is prohibited in all positions within Atakey. For the age group that is not of legal age but within the limit stipulated by the Labor Law, it is allowed to work as a worker with the consent of the child and young worker and the approval of the parent or guardian of the child and young worker, within the framework of the Regulation on Procedures and Principles for the Employment of Child and Young Workers. Atakey's rules regarding child labor are implemented in accordance with the Labor Law, Occupational Health and Safety Law, ILO Fundamental Conventions, the United Nations Convention on the Rights of the Child, and other relevant legislation and standards. An approach of not purchasing services from any institution that employs child labor is adopted, and no services are provided to any institution that engages in activities or statements that are harmful to the health and safety of children.

5.5 Ethical Business Conduct


Atakey is committed to complying with all applicable laws and standards, keeping accounting or financial records transparent and up-to-date to prove compliance with relevant legislation, not tolerating corruption and bribery under any circumstances; not giving/accepting bribes to gain benefits or facilitate work, creating the necessary mechanisms and policies to combat corruption and bribery, avoiding situations that create conflicts of interest, respecting human rights, implementing strict policies against harassment and bullying, and protecting the rights of its stakeholders in these matters. All employees and stakeholders are expected to fulfill their duties within the framework of fundamental ethical and human values and report unethical behavior to the notification channels specified in the TFI TAB Gıda Yatırımları A.Ş and Subsidiaries Ethics and Whistleblower Policy. Within the TFI Group, of which Atakey is a part, a zero-tolerance approach is adopted towards ethical violations. In this context, ethical principles are explained with the TFI TAB Gıda Yatırımları A.Ş and Subsidiaries Code of Conduct, which has been prepared as a guide; Atakey's commitment to ethical principles is expected to be shared with all employees and third-party stakeholders.

5.6 Right to Organize and Unionize

Atakey respects the right of employees to organize and unionize within the framework of all relevant legal grounds, primarily the Universal Declaration of Human Rights and the Constitution; it does not put pressure on or discriminate against employees who wish to exercise their right to organize and unionize.

5.7 Non-Discrimination

Atakey acts in accordance with the Universal Declaration of Human Rights and adopts equality, diversity, and inclusiveness as principles. In the company culture, these principles are accepted not only as corporate responsibility but also as social responsibility, and all employees are expected to act in accordance with these principles. In line with these principles, all individuals are included in the Company's processes without discrimination based on gender, sexual orientation, ethnic identity, age, religious and political views, disability, etc. Accordingly, no

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tolerance is shown for acting separately from these principles or for any discrimination and bullying within AtaKey, and those who do not act appropriately in this regard are expected to be reported to the notification channels.

The employment of foreign employees in accordance with the laws is supported, and in this context, employment contracts are prepared in a language they can understand. All personnel procedures, from recruitment to the termination process, are carried out in accordance with the current legislation. AtaKey protects the legal rights of foreign workers regarding employment. No tolerance is shown for the employment of illegal workers.

In recruitment and placement, action is taken in accordance with the principle of merit, based on whether the person has the qualifications and skills required for the job. Fair employment practices are carried out in terms of employee remuneration, working hours, occupational safety, promotion appointments, performance evaluation, fringe benefits, training, opportunities, etc., free from discrimination.

5.8 Environmental Protection

AtaKey is committed to full compliance with both local legislation and universal principles regarding the environment and a clean society. The principles and rules adopted within the scope of corporate and social responsibility and all priorities in this regard are carried out by considering what is best for the environment. As AtaKey, in addition to legal obligations, it is aimed to prevent waste and use resources efficiently within the scope of zero waste, to implement the best environmental solutions, to use environmentally friendly resources, to support all kinds of initiatives that will help raise awareness in this field and increase environmental awareness. With this perspective, it is aimed to contribute to environmental sustainability. In all geographies where operations are carried out, care is taken to fulfill environmental responsibilities towards society in harmonious cooperation with shareholders, employees, non-governmental organizations, and other stakeholders. In all activities, studies that will eliminate or reduce environmental problems, optimize energy use, ensure waste management, and use natural resources in the most efficient way are determined and implemented.

5.9 Employment Contract (Employer Contract)

An Employment Contract containing the conditions appropriate to the workplace and laws is prepared between AtaKey and the person to be employed, and is signed by the personnel who agree to start the job.

6.0 VALIDITY

This Policy shall enter into force upon the approval of the Chairman of the Board of Directors and the Deputy Chairman of the Board of Directors as of the date of publication and its validity period shall continue as long as the Policy remains in force.

In the event of any discrepancy or conflict between the English and Turkish versions of this Policy, the Turkish version shall prevail.