
CODE OF ETHICS

Durukan Şekerleme San. ve Tic. A.Ş. ("Durukan Şekerleme") has defined in order to increase its corporate value; "Durukan Şekerleme Code of Ethics" is defined as the principles and rules that must be followed within its establishment.

All Durukan Şekerleme employees, Board Members and Suppliers are obliged to comply with the Durukan Şekerleme Code of Ethics. Durukan Ethics Committee is responsible for the implementation and supervision of these principles and rules.

With these rules, it is aimed to create established rules, a strong corporate culture and to increase loyalty to the enterprise.

Durukan Şekerleme Code of Ethics is based on the values of Durukan Şekerleme.

Durukan Şekerleme Ethics Committee, Unit Manager or Human Resources Department should be consulted in case of doubt.

Durukan Şekerleme Code of Ethics is published on the Durukan Şekerleme corporate website and internal publications, sent to suppliers and disclosed to employees.

In this context, Durukan Şekerleme Ethical Principles are as follows:

1. Honesty and Fair Act

As Durukan Şekerleme, it is our primary principle to act honestly and fairly in our relations with all persons and institutions with whom we have relations. The name of our company is a source of pride for us and should evoke a sense of trust in everyone we are in relationship with.

2. Conflict of Interest Prevention Policy

In cases where the interest of a Durukan Şekerleme employee does not coincide with the interest of the company, this situation is defined as conflict of interest.

As Durukan Şekerleme, we avoid any attitudes or behaviors that may cause conflicts of interest in our relationships and act in the light of honesty and loyalty principles. We do not provide personal bribes to individuals, family or relatives of the persons and institutions with whom we have business relations due to our duty. We do not engage in activities based on financial benefit. We do not compete with the company. We always refrain from using our Durukan Şekerleme identity for personal interests.

3. Privacy Policy

As Durukan Şekerleme, we take care of protecting the confidential information of our customers, suppliers, employees and other related persons and organizations, except where the law requires otherwise.

Products, services, ideas, concepts and other information in the daily course of business are valuable and intellectual property assets for our company. Various laws make it possible to protect these assets. Examples of confidential and intellectual property information include sales and marketing information, customer and staff records, research and development information, technical data, pricing information, strategies and information on new products and services. As Durukan Şekerleme employees, we do not disclose confidential information of our company.

4. Our Business Standards

As Durukan Şekerleme, we treat our employees, suppliers, customers, competitors, laws and society in accordance with our business conduct standards in order to fulfill our responsibilities. Our business standards are as follows:

- Complying with Labor Law and Ministry of Labor and Social Security Regulations,
- Keeping financial records in compliance with all applicable laws and regulations,
- Providing a business environment free of discrimination, harassment and any behavior that is not of moral value within the Company,

- Not employing child worker,
- Complying with national laws in employing young workers,
- Complying with the provisions of our written disciplinary regulations,
- Being fair about wages, working hours and resting hours,
- Focusing on Occupational Health and Safety and providing appropriate working conditions,
- Producing products in accordance with HACCP quality standards,
- Complying with all environmental laws and regulations.

5. Responsibilities

Legal Responsibilities

As Durukan Şekerleme, we conduct all our domestic and abroad activities based on the laws of our country and the rules of international law, and act in accordance with the laws and regulations determined by the legal institutions. Both our suppliers and our employees are required to comply with all applicable laws and regulations that govern our business. Otherwise, non-compliances are reported and evaluated in the fastest way possible.

In addition, Durukan Şekerleme carries out all its activities in accordance with the laws and legal regulations without any expectation of interest by taking an equal distance to all institutions and organizations.

Social Responsibilities

As Durukan Şekerleme, it is among our main goals to voluntarily contribute to a better society and cleaner environment. In this context, in the selection of our suppliers and business partners; compliance with international norms is one of our main criteria in matters such as human rights, occupational health and safety, improvement of work environment.

As Durukan Şekerleme, we do not allow any aggressive or inhuman practices in our company or in our society. We always aim to raise the level of social welfare of society by taking the values of contemporary society as a basis in the light of science and philosophy. For this purpose, we are happy to take part in activities for the benefit of society with our employees, business partners and suppliers.

Responsibilities to Our Customers

It is part of our goals and culture to fully understand, comprehensively assess and respond to our customers' needs and to live in a customer-oriented manner.

We can only achieve our goals, by quickly assessing and responding to the changing needs and expectations of our customers, building long-term relationships and gaining their loyalty, comprehensively understanding their needs, and providing superior products and services adhering to ethical rules.

Responsibilities to Our Employees

No discrimination is allowed in Durukan Şekerleme. We value and listen to each other. As Durukan Şekerleme employees, we endeavor to contribute to the creation of an environment of trust in the company that respects the private lives of individuals, is fair, constructive and where different ideas are freely expressed.

As Durukan Şekerleme, we adopt an equal working culture in recruitment, education, payments, promotion applications, dismissal procedures and retirement applications regardless of their beliefs, gender, religion, race, language and geography.

Responsibilities to Our Suppliers

As Durukan Şekerleme, we protect the information of individuals and organizations we do business with in accordance with confidentiality principles. We fulfill our obligations to our suppliers and partners in a timely and accurate manner within the framework of "Durukan Şekerleme Standards of Business Conduct".

Responsibilities to Our Competitors

As Durukan Şekerleme, we support competition that does not go beyond the ethical framework we have drawn, is free from unfair competition and stays within the bounds of the law.

Responsibilities to the Environment

Our company, employees, suppliers and business partners should take care not to harm the environment in their work. As Durukan Şekerleme, we comply with all environmental laws and regulations and fulfill our obligations with environmental protection awareness.

Creating a safe workplace and protecting the environment Durukan Şekerleme is an important part of company's fundamental workplace rules.



POLICIES SUPPORTING **THE CODE OF ETHICS**

Policy to Ensure Impartiality and Prevent Conflict of Interest

Durukan Şekerleme employees should avoid attitudes or behaviors that may cause conflict of interest in their relations with the company and act in the light of honesty and loyalty principles.

The factors causing conflict of interest are as follows:

- The employee has direct or indirect shares in a company that is a competitor, customer, supplier of or is in a commercial relationship with Durukan Şekerleme,
- The employee has a commercial relationship with a company that is a competitor, customer, supplier of or is in a commercial relationship with Durukan Şekerleme,
- The employee is a member of the governing body of a company that is a competitor, customer, supplier of or is in a commercial relationship with Durukan Şekerleme or has an employment contract with such a company,
- The employee has a direct or indirect interest in the movable or real estate assets, or in industrial or intellectual property rights and other rights to which Durukan Şekerleme is entitled.

Non-Benefit Policy

Durukan Şekerleme's employees do not provide personal bribes to individuals, family or relatives from the persons and institutions with whom they have business relations due to their duties. They do not engage in activities based on financial benefit. They do not use the name and power of the company and the identity of Durukan Şekerleme for personal benefit. They do not compete with the company.

They ensure that the code of ethics comes into play when it believes that in the event of a potential conflict of interest, the interests of the parties concerned can be safeguarded through legal and ethical procedures. In case of doubt, he/she consults with his/her manager or Human Resources Department.

Anti-Bribery Policy

The main principle is that Durukan Şekerleme employees do not accept any direct or indirect goods or interests that affect or have a potential impact on their impartiality, performance, decision or performance, whether they have economic value or not.

It is forbidden for employees of Durukan Şekerleme to enter into a relationship of interest in the public and private sectors.

Commercial bribery is prohibited.

None of the employees is authorized to give anything - directly or indirectly - to any person for the purpose of obtaining or protecting commercial agreements, confidential information or unfair commercial advantages, and to provide unfair business advantages.

None of the employees is authorized to accept anything of value without the right to do so, for undertaking a duty, providing confidential information or offering unfair commercial advantages.

The Anti-Bribery Policy requires respect for Durukan Şekerleme's other strategies and procedures, which are implemented from time to time in relation to:

- Offering, paying for or accepting gifts, non-pecuniary gratuities, entertainment, or free trips from or on behalf of government officials or suppliers, customers or competitors,
- Making commitments to consultants, agents or other third parties.

Breach of Durukan Şekerleme policies or any applicable law or rule will result in serious disciplinary action, including termination of the employment agreement and/or termination of business relationship. Committed to ethical and respectful behavior against the law, Durukan Şekerleme requires the interested parties to report, in order to investigate the actual or estimated violations of the law or ethical standards in an appropriate manner and to take the necessary measures. The obligation to report must be fulfilled, if there is a justifiable suspicion of a possible violation of the foregoing, even if in doubt.

Durukan Şekerleme employees, who must comply with these provisions, are obliged to cooperate fully to control the specified violation along with the obligation to report possible violations. Failure to cooperate during an investigation, deliberate fraudulent or distorted information is subject to

punishment by serious disciplinary sanctions that may result in termination of the employment agreement and/or termination of the business relationship.

Confidentiality and Intellectual Property Policy

Durukan Şekerleme employees;

- May not receive confidential information from any customer, supplier or any other person, unless subject to a written confidentiality agreement or confidentiality clause,
- Must protect confidential information belonging to customers, suppliers and other persons, except as otherwise required by law,
- Must comply with confidentiality obligations to their former employers or to persons with previous relationship,
- In cases where they are subject to confidentiality agreement or clause, they must comply with the obligations and commitments set out in such agreements or clauses.

Confidential information of the company must be protected and not disclosed to third parties, as the intentional or unintentional disclosure of confidential information about the company's business, financial status and legal status, may have a negative impact on the company's financial stability and competitiveness.

Products, services, ideas, concepts and other information in the daily course of business are valuable and intellectual property assets for the company. Various laws make it possible to protect these assets. Examples of confidential and intellectual property information include marketing plans, sales and marketing information, customer and staff records, research and development information, technical data, pricing information, strategies and information on new products and services.

It is the company's best interests to protect confidential and intellectual property information and to prevent any unlawful or unauthorized disclosure. Therefore, extreme care must be taken when using telephones, faxes, electronic mails and other electronic means of sending and storing information. Confidential information should not be discussed in public places where other people may hear. Unless a written confidentiality agreement has been made in advance by authorized persons, the confidential information must never be

given to anyone outside the company, and in case a confidential agreement has been made, its terms must be respected.

Establishing a Fair Working Environment Policy

Creating and maintaining a fair working environment for Durukan Şekerleme employees is one of the most important priorities for the company aims to create a respectful, fair and safe working environment in order to increase employee performance, loyalty, happiness, development and success in line with all applicable laws.

The principles adopted in establishing a fair working environment are as follows:

Durukan Şekerleme activities are in compliance with all laws and regulations related to employment and working life. Durukan Şekerleme employees are obliged to act in compliance with all legal regulations.

Within the scope of Durukan Şekerleme Human Resources practices; in recruitment procedures, payments, training services provided, rewards, promotion and rotation practices, dismissal and retirement procedures, social benefits, etc. in all transactions, no discrimination is allowed for reasons such as race, nationality, social class, religion, age, disability status, gender, marital status, sexual orientation, political preference, etc. reasons, no discrimination is made, and a fair structure is adopted in all practices.

A harmonious working environment is provided by ensuring that people with different views and beliefs work in harmony and by preventing possible conflicts.

Everyone contributes to the creation of an environment of trust where employees' private lives are respected, fair, constructive, and different opinions are freely expressed.

Conversations between persons are not listened to by third parties.

Personal information of the employees is not shared with third parties, is not given to others unlawfully, and is not used for other purposes.

All employees' personal opinions, beliefs, lifestyle and family life are respected.

The policy of Durukan Şekerleme and the laws of our country prohibit all harassment, improper behavior, intimidation and retaliation in the workplace or in the company or in business ceremonies, events and meetings. In this

application, employees to work in a work environment where oral, visual, physical and sexual inviolability is protected. Prohibited applications include:

Verbal abuse: Abuse; humiliation; derogatory comments; threats or frightening statements of ethnic, racial, religious or sexual nature.

Visual harassment: Written, printed or electronic materials, gestures, pictures or physical objects of an offensive, ethnic, racial, religious or sexual nature, which are displayed, sent to someone or arranged for others to see, which are degrading, offensive, threatening, insulting or aggressive.

Physical harassment: An undesired contact, improper behavior or physical intervention and touch aimed at a person or personal property.

Sexual harassment: Indirect or open employment, salary increase or other advantage, or undesirable behavior that is sexually abusive, whether or not there is a threat of negative action if such requests are reversed.

Retaliation: Negative action taken against an employee who alleged discrimination or harassment or who provided internal or external evidence to support the claim.

It is ensured that workplace physical working conditions are healthy and reliable for all employees. A safe and healthy working environment is provided by taking into consideration all special hazards in the factory area. Necessary measures are taken to prevent accidents and injuries and to minimize the risks.

SOCIAL RESPONSIBILITY **POLICY**

As Durukan Şekerleme, our Social Responsibility Policy defines the standards we create based on our basic principles and values that cover all our business partners, employees and suppliers.

Social Responsibility standards, which constitute our Social Responsibility Policy, aim to produce the best quality and highest efficiency products and services, to give our employees all personal rights within the legal framework, to comply with occupational health and safety rules, to be sensitive to the environment, to have an open and honest communication, to respect and it aims to create a workplace that is valued.

Social compliance policy is announced to all employees through education, information is provided to our suppliers and our suppliers are evaluated according to these criteria. Under this policy, our employees can write their worries, concerns and complaints in the complaint boxes. In addition, institutions or persons outside Durukan Şekerleme can share their complaints through Durukan Şekerleme official website. No retaliation or punishment shall be imposed against any institution or person who submits their complaints.

The Social Compliance Policy covers the following components:

- Regular Employment and Voluntary Work
- Child Labor
- Discrimination
- Working Hours and Wages
- Health and Safety
- Commitment with Society and Stakeholders
- Foreign National Employees
- Human Trafficking
- Rest Days and Holidays

- Recruitment and Employment
- Employment Contracts
- Employee Discipline
- Harassment and Mistreatment
- Bribery and Corruption

Regular Employment and Voluntary Work

Durukan Şekerleme prohibits all forms of forced labor, including working in prison, an apprenticeship contract, labor against debt, military or slave labor and human trafficking.

Our employees apply to Durukan Şekerleme in accordance with their free will, are selected and work.

Durukan Şekerleme does not confiscate employee's any receivables as collateral; the employee is free to terminate the employment contract he/she has established with the company.

Child Labor

Durukan Şekerleme's practices are subject to the minimum working age provisions of applicable laws and regulations and does not contain any child labor. In accordance with the relevant law, persons under the age of 18 are prohibited from working in positions requiring dangerous work. Our factory's ban on child labor complies with Labor Law, Occupational Health and Safety Law and other legal regulations and International Labor Organization (ILO) standards.

Discrimination

As Durukan Şekerleme, we value all our employees and always take into consideration the services and benefits they provide. To give confidence to our employees and to ensure equal opportunity against discrimination is our obligation. Our factory; does not discriminate or harass on the basis of race, gender, race, nationality, or any social class, religion, age, disability status, political opinion, sexual orientation, marital status. Within the company, all forms of discrimination and harassment are prohibited. Criteria such as open position, requirements of position, training, interests, talent and work experience are taken into consideration in the selection of the personnel to be employed in Durukan Şekerleme.

Working Hours and Fees

Durukan Şekerleme acts on wages, working hours, overtime and supplementary payments in accordance with applicable laws and employment contracts.

Our working hours are regulated in accordance with the Labor Law and other relevant legislation. Before starting working, we provide all our employees with the conditions, amounts, salary intervals, overtime wages and additional payments etc. At Durukan Şekerleme, all employees are paid at least to the extent that they can maintain their fundamental needs. In addition, we make a career plan for our employees, set both organizational and individual career goals, and support them with our trainings to develop the skills necessary to achieve their goals.

Health and Safety

Durukan Şekerleme creates and maintains safe and healthy working conditions. The company aims to create a work environment in which employees can work safely and efficiently by minimizing all kinds of accidents, injuries, health-threatening effects and any health risks that possibly may be exposed in the working environment. Within this framework, it regularly provides health and safety training to its employees.

Commitment with Society and Stakeholders

Durukan Şekerleme creates the environment where employees can discuss their problems with the representatives, enables them to report in writing to the suggestion and complaint boxes, and establishes the necessary internal committees to evaluate and conclude the notifications.

Employing Foreign Workers

For foreign employees who apply for employment at Durukan Şekerleme, the employment contract is arranged in a language that they understand and their legal rights of labor are always protected.

Regular Employment and Voluntary Work

Durukan Şekerleme takes the employment relationship set out in the relevant laws as a basis and carries out its activities within the legal framework. Durukan Şekerleme is strictly prohibited to employ illegal workers. The employees work

at Durukan Şekerleme in line with their free will. All information of the employees is protected and kept to the extent determined by the law.

Rest Days and Holidays

Employees shall not be deprived of rest days and holidays within the framework of their legal rights. Employees who work six days a week are given a one-day week holiday.

Recruitment and Employment

The open positions required by Durukan Şekerleme and the requirements of the position are determined by the management. Candidates whose applications are successful are employed in Durukan Şekerleme with an egalitarian approach in accordance with the law. An equal working culture is adopted in recruitment, training services, payments, promotion practices, dismissal procedures and retirement applications regardless of the employees' belief, gender, race, language or nationality.

Employment Contract

The "Employment Contract" between Durukan Şekerleme, as the 'Employer' and the candidate as the 'Employee', containing the conditions offered to the candidate in accordance with the law together with the rules of discipline, is signed.

Discipline Rules

In order to ensure disciplined work by Durukan Şekerleme, disciplinary rules determined by management and sanctions and punishments determined by Durukan Şekerleme Disciplinary Board are applied. These rules are signed by the employee with their own free will with the 'Employment Contract'.

Harassment and Mistreatment

All kinds of verbal, visual, physical, sexual harassment and retaliation are strictly prohibited in Durukan Şekerleme.

Bribery and Corruption

It is strictly forbidden to receive or give bribes and corruption at Durukan Şekerleme. We expect all our employees to act within the framework of ethical rules.

Education

We know that the training and development responsibility of our employees is primarily with Durukan Şekerleme and we act with this responsibility. We make a career plan for our employees, set both organizational and individual career goals, and support them with our trainings to develop the skills necessary to achieve their goals. The company managers prepare environment and opportunities for their employees in line with this tendency, support and provide guidance. Our basic principle in training and development activities is to ensure that our employees perform their work, in the best quality and in the right way, and to support the development of their personal competences and skills.

