

2025 SUSTAINABILITY REPORT

CONTENTS

Since our establishment, we have embraced the philosophy of "Make happy, be happy," and have integrated sustainability as a core element of our business. We are committed to growing and evolving together with our stakeholders - from soil to farmers, from employees to customers - by engaging every part of our value chain.



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ABOUT THE REPORT

As Ülker Bisküvi Sanayi A.Ş., we report on our performance in the areas of economic, environmental, social, and governance in the Sustainability Report we publish annually. The report covers the initiatives we have undertaken and the progress achieved in line with our sustainability strategy, which is structured around four pillars: **Our Planet, Value Chain, Employees, and Community.**

Our 2025 Sustainability Report has been prepared in accordance with the GRI Standards. Our compliance report, prepared in line with the Türkiye Sustainability Reporting Standards (TSRS) has been published as a separate report. We also address our climate-related risks and opportunities in the framework of TSRS, and present our approach and progress in the areas of governance, strategy, risk management, and metrics and targets in our TSRS report.

Through our report, we share with the public our progress under the 2030 roadmap, developed in line with our sustainability strategy. In this report, we also present the findings of the double materiality analysis[1] we conducted in 2023, our management approach to the material topics identified through this analysis, the targets we have set, and the metrics we use to monitor progress.

[1] In the double materiality analysis, the impacts of sustainability topics on the company are considered (financial materiality), while the company's impacts on the environment and the communities are identified (environmental and social materiality).

In the Appendices section of our report, we provide a table summarizing the corporate governance structure of our management committees, a glossary of terms for technical terminology, a list of the organizations we are members of, our stakeholder communication channels, a human rights risk assessment table, the reporting guidelines, and our performance metrics.

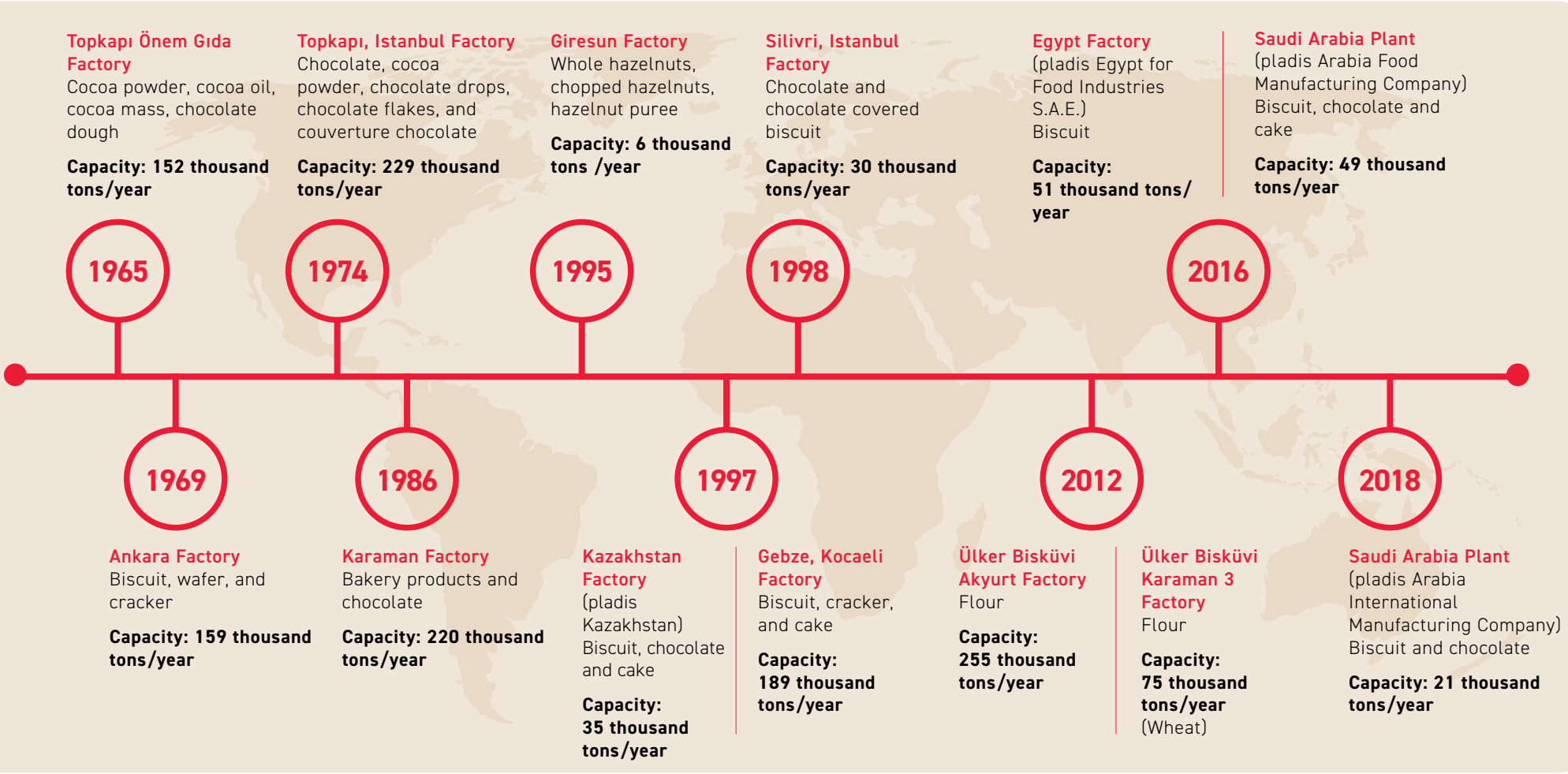
The TSRS-Compliant Sustainability Report can be accessed **here.**

We welcome any feedback, suggestions, or inquiries regarding our sustainability efforts at **surdurulebilirlik.platformu@ulker.com.tr.**



SCOPE

This report covers the operations in Türkiye and abroad for the period from January 1 to December 31, 2025 (as Ülker Bisküvi Sanayi A.Ş.; a total of 13 facilities, including 3 in Istanbul, 2 in Karaman, 2 in Ankara, 1 in Kocaeli, 1 in Giresun, 2 in Saudi Arabia, 1 in Egypt, and 1 in Kazakhstan).



ASSURANCE

Selected environmental and social performance metrics in Ülker Bisküvi's operations in Türkiye and abroad are subject to external limited assurance. The External Assurance Statement can be found on **page 206 of the report**.

CEO'S MESSAGE



ÖZGÜR KÖLÜKFAKI

CEO

Dear Stakeholders,

In 2025, climate volatility, ecosystem pressures and geopolitical uncertainty continued to reshape the food system and the security of key agricultural inputs. Against this backdrop, we continued to put sustainability at the heart of how we grow, invest and operate.

Our compass to a sustainable future: the 5M Happiness-Based Growth Model

We completed the first ten-year phase of our sustainability journey in 2024. This year, we entered the second phase and developed our Decarbonization Roadmap covering 2030 and 2050. With our 2030 interim target and 2050 net-zero commitment submitted to the Science Based Targets initiative (SBTi), we became one of the leading companies in Türkiye to make this commitment. We are steadily advancing toward our 2030 targets across four pillars: Our Planet, Value Chain, Employees, and Community. The 5M Happiness-Based Growth Model brings together five principles—consistent, competitive, profitable, sustainable and people-centered growth—and guides how we create long-term sustainable value.

Advancing toward our Net Zero target through efficiency projects

Through our zero-waste corporate culture, we are putting our net-zero and circular economy approach into practice. In Türkiye, by using 100% I-REC-certified renewable energy in our Ülker finished product and raw material production facilities, we achieved net-zero Scope 2 greenhouse gas emissions, thereby preventing 97,193 tons of CO_2 emissions. Through the energy and water efficiency projects we implemented in 2025, we saved 12,011 MWh of energy and 26,759 m³ of water; while generating approximately TRY 32 million in financial savings, we also avoided a further 3,382 tons of CO_2 emissions.

By combining AI-powered route optimization, our double-deck truck fleet, and rail transport in logistics, we have reduced our carbon emissions by 70% since 2014, we achieved TRY 100 million in savings and reduced our logistics costs by 4% compared to the previous year in 2025.

Compared to 2014, we increased the overall reduction in carbon emissions per unit of production to 50.7%. We also reduced water usage per unit of production by 37% compared to the same year, taking another effective step toward our 2030 target of 45%. We reduced plastic use in our packaging by 96 tons and paper usage by 25.2 tons. As of the end of 2025, all our plastic packaging is free from composite structures.

We grow stronger together with our farmers

Across all the geographies in which we operate, we work together with farmers and suppliers. In 2025, we conducted our Regenerative Agriculture in Wheat Project with 101 farmers: 18 farmers implemented advanced practices across 1,060 decares, while 83 farmers implemented introductory-level practices across 5,800 decares. Through methods such as Digital Soil Analysis, 4R Nutrient Management (right source, right rate, right time, and right application method), and cover cropping, we protected soil health while supporting farmers with data-driven decision-making. In addition, through risk assessments, independent third-party audits, improvement plans, and capacity-building activities under our Supplier Environmental, Social, and Governance (ESG) Program, we support our suppliers' sustainability journey and help make our value chain more resilient, transparent, and responsible.

We aim to reduce environmental impact and increase social impact through our projects

We establish transparent and traceable structures to reduce the environmental impacts of our supply chain while increasing its social impact. Under our Beyond Cocoa project, conducted with the Earthworm Foundation in Côte d'Ivoire, we work closely with the cooperatives from which we source cocoa. In 2025, agroforestry practices were implemented across 637 ha of cocoa farmland, while 320 farmers received training on sustainable land management and shade-tree integration. The Starling satellite monitoring system verified that the cocoa sourced from six cooperatives was produced without causing deforestation.

Through our Beyond Hazelnut project, we supported 200 farmers, including 100 women. As part of biological control efforts conducted in collaboration with the Hazelnut Research Institute, 9,000 samurai wasps were released into the ecosystem; pest populations were monitored in real time using 200 pheromone traps and three AI-powered smart camera systems. As a result of these measures, we kept pest density in the Giresun pilot area well below that of neighboring regions.



Digital transformation and automation contribute significantly to savings

Alongside our investments in advanced technology and automation at our facilities, we strive to leverage digital transformation wherever possible. By integrating Internet of Things (IoT), Industry 4.0, and artificial intelligence applications across processes ranging from sales and production to marketing and the supply chain, we achieved significant gains in data integration, cost management, and operational efficiency.

We achieved a tangible outcome from our digital transformation in production at the Wafer 4 Facility in Topkapı: through a fully autonomous production model that brings together predictive maintenance applications, AI-powered quality control, and real-time energy monitoring under a single digital framework, we generated TRY 59 million in savings.

Consumer needs are at the heart of our approach to innovation

While creating value for society, we continue to see innovation as a key driver of our growth. In line with this approach, we expanded our R&D capabilities and invested a total of TRY 495.5 million including consumer-focused products and technologies. We bring an average of 55 new products to market each year, and in 2025 introduced a range of innovative offerings, including Go Ahead's products containing only naturally occurring sugars from fruit and high in fibre, a 20% protein bar, the Ülker Chocolate Istanbul range, and Ülker Altınbaşak Taco Flavoured & Quinoa Snack.

Our sustainability vision inspires confidence in investment financing

We believe it is important for our **'Sustainable Happy Growth'** approach to be reflected in the financial sphere as well, and we directly link our performance targets to our financing. Accordingly, in October 2025, we refinanced ahead of maturity the USD 248 million sustainability-linked syndicated loan we signed in 2023 and signed a new USD 250 million agreement with a five-year maturity. In November 2025, we renewed our EUR 75 million loans with both the European Bank for Reconstruction and Development (EBRD) and the International Finance Corporation (IFC) for five-year maturities, deepening our partnerships with international development finance institutions.

In line with our commitment to transparently disclose our company's climate-related risks and opportunities, we are also publishing separately this year our second TSRS report, prepared within the framework of the Türkiye Sustainability Reporting Standards (TSRS) published by KGK (Public Oversight, Accounting, and Auditing Standards Authority).

Preparing our employees for the future with our Investing in People vision

To further strengthen our ethical foundation, we became a signatory to the United Nations Global Compact in 2025, placing its Ten Principles in the areas of Human Rights, Labour, Environment, and Anti-Corruption at the core of our business processes.

Through our People-Centered Happy Growth approach, which forms the foundation of the 5M Happiness-Based Growth Model, we extend our 'Make Happy, Be Happy' vision beyond our products to the relationships we build with all stakeholders across our ecosystem.

As a reflection of this approach, we were recognized as a Top Employer for the fourth consecutive year and received the Happy Place to Work Excellent Employee Experience Award. We also reinforced our commitment to equality by becoming the first large company in Türkiye with more than 5,000 employees to earn the Equal Salary Certification. Globally, we are the first company in the FMCG Snacks sector to earn this certification. Women account for 41.5% across all management levels and 33% at director level, demonstrating that we have built a balanced leadership pipeline.



Turning our collaboration with academia into a tangible product

We regard scientific collaborations as critical to the future of sustainable agriculture. This year, our Biofortification Project conducted with Sabancı University on wheat, one of our key raw materials, delivered tangible results:

the zinc content in wheat treated with foliar applications of zinc and selenium increased by 55%, while selenium levels rose 28-fold, and we measured that a significant part of this enrichment was transferred to the whole wheat flour produced at our facility. These scientific findings were brought to consumers in July 2025 with the launch of the Field-Enriched Cereal Biscuit with Milk Chocolate, Puffed Rice, Orange, and Coconut under the Saklıköy brand.

We rank among the top performers in sustainability assessments by international organizations

We are pleased that our sustainability efforts continue to perform strongly in independent assessments. In LSEG's (London Stock Exchange Group) assessment, we became category leader for the third consecutive time, achieving the highest score among 427 food companies worldwide. We continued to be included in S&P Global's The Sustainability Yearbook, remaining the only Turkish company among 26 companies in the food products category. In the Carbon Disclosure Project (CDP), we improved our water security score to A- while maintaining our climate change score at B. In addition to the BIST Sustainability Index, in which we have been included since 2015, we were also included in the BIST Sustainability 25 Index this year.



We continued contributing to sports and society

Our projects grounded in social awareness continued in 2025. We maintained our support for the earthquake-affected region by renovating the basketball court at Hatay İSO Life City, delivered children's packages to those in need during Ramadan and Eid al-Adha, and, as part of 'Make Happy, Be Happy Day,' provided winter clothing, books, and product support to 841 children in Ağrı and Van. Through the saplings we planted, we increased the Ülker Beautiful Country Forest to a total of 194,350 saplings.



In sports, we extended our collaboration with the Turkish National Paralympic Committee for another four years, through the Los Angeles 2028 Paralympic Games; we supported the European Para Youth Games held in Istanbul as the main sponsor and, through the 'Yüreğiyle Yarışanlar' video series, brought the stories of Paralympic athletes to an audience of approximately one million.

We leave behind another year in which we further strengthened our zero-waste corporate culture and combined our digital and scientific capabilities with our sustainability targets. We made a strong start to the second phase of our Net Zero Journey and made artificial intelligence one of the key accelerators of this journey. I would like to sincerely thank all our stakeholders, colleagues, and consumers, whose support we have always felt throughout this journey.

With this sense of responsibility, we do not compromise on our sustainability vision and our understanding of responsible growth as we strengthen Ülker's global competitiveness. For us, sustainability means managing today in the best possible way while building tomorrow with great diligence. Together with all our stakeholders across our value chain, we are working with determination toward a future that is more resilient to climate risks, uses resources more efficiently, and places social benefit at its core. We believe that every step we take today contributes not only to our company, but also to our sector and to the quality of life of future generations.

Guided by this belief, we will continue to generate sustainable value and create lasting impact for our country, our society, and our planet.

Sincerely,

ÖZGÜR KÖLÜKFAKI
CEO

ABOUT US

As we continue the journey we began in 1944 as Türkiye's leading food company, we are strengthening our leadership through our sustainability efforts, which have gained momentum since 2014. Guided by our focus areas, Our Planet, Our Value Chain, Our People, and Our Society, we are steadfastly progressing toward our 2030 targets.

- About Ülker Bisküvi
- Our Value Chain
- Our Sustainability Journey
- Corporate Governance
- Sustainable Finance
- Ethics and Human Rights
- Information Security and Cybersecurity



ABOUT ÜLKER BİSKÜVİ

Our journey, which began in a small workshop in 1944, continues today with Ülker as Türkiye's leading food company. Hundreds of our products reach consumers across the chocolate, biscuit, and cake categories.

We operate at nine locations in Türkiye, including our factories in Istanbul (Silivri and Topkapı) and our facilities in Karaman, Kocaeli, Ankara, and Giresun. In addition, with a total of four overseas production facilities—one in Egypt, two in Saudi Arabia, and one in Kazakhstan—we maintain a strong international presence. Thanks to our international production network, we reach consumers across a broad geography spanning the Middle East to Central Asia, and Europe to Africa and the Americas. With our strong brand and robust production infrastructure, we continue our global growth story.

CAPITAL STRUCTURE

In Ülker Bisküvi's ownership structure, pladis holds a 47.23% stake, while other shareholders hold 52.77%. Detailed information on the capital structure can be found on page 28 of the Ülker Bisküvi 2025 Annual Report[2].



[2] https://ulkerbiskuviyatirimciiliskileri.com/wp-content/uploads/2026/03/ULK_FRAE_2025_KAP.pdf

Our Global Reach

We are bringing our products to consumers all around the world.

696

thousand tons

Total Sales Volume

TRY 18,416 million

EBITDA

TRY 111,905 million

Sales Revenue



KEY FINANCIAL METRICS

Summary Income Statement (Million TRY)

	2024	2025
Revenue	110,078	111,905
Gross Profit	32,810	32,346
EBITDA	20,414	18,416
Profit/Loss for the Period (Parent Company)	9,687	4,875

SALES VOLUME

Sales Volume by Category (Thousand Tons)

	BISCUITS	CHOCOLATE	CAKE
2024	338	227	56
2025	346	209	59

Net Sales by Category (Million TRY)

	BISCUITS	CHOCOLATE	CAKE
2024	40,947	55,364	8,423
2025	39,261	58,468	8,643

HIGHLIGHTS OF 2025

OUR PLANET

- In line with our SBTi-aligned 2030 interim targets and our 2050 net-zero commitment, we accelerated emission reduction projects across our production operations and the value chain.

SCIENCE BASED TARGETS
DRIVING AMBITIOUS CORPORATE CLIMATE ACTION

- Through the energy and water efficiency projects we implemented in 2025, we achieved total savings of 12,011 MWh of energy, 26,759 m³ of water, and approximately TRY 32 million in financial savings, while avoiding **3,382 tons of CO_2 emissions.**
- We continued our **internal carbon pricing** efforts to boost energy efficiency investments and assess the impact of our projects.
- In Türkiye, by using 100% I-REC-certified renewable energy in our Ülker finished product and raw material production facilities, we have achieved net zero Scope 2 greenhouse gas emissions, thereby preventing **97,193 tons CO_2 emissions.**
- We reduced water usage per unit of production by **37% compared** to 2014 and continued our water efficiency projects to achieve our 2030 target of 45%.
- We continued our **internal water pricing** efforts for our facilities located in high water-stress areas.
- We recycled **24,666 tons** of hazardous and non-hazardous waste across all our factories.
- We reduced plastic packaging by **96 tons** and paper usage by **25 tons**. As of the end of 2025, all our plastic packaging is free from composite structures.
- As part of the Ülker My Beautiful Country Forest project, we reached a total of **194,350 saplings** through our sapling planting efforts.
- In the 2025 assessments conducted by the Carbon Disclosure Project (CDP), we improved our water security score to **A- while** maintaining our climate change score at **B**.

CDP

- We have remained included in the BIST Sustainability Index since 2015 and were included in the BIST Sustainability 25 Index this year.
- By being included in S&P Global's the Sustainability Yearbook for the **fifth consecutive time**, we continue to be one of the nine Turkish companies on the list and the only Turkish company among 26 companies in the food products category.

S&P Global

- In our report, we present the **Biodiversity Assessment and Risk Analysis** we conducted across all our production facilities and key raw materials using the LEAP (Locate, Evaluate, Assess, Prepare) methodology proposed by the Taskforce on Nature-related Financial Disclosures (TNFD)[3].
- In the sustainability assessment by LSEG (London Stock Exchange Group), we became category leader **for the third consecutive time**, achieving the highest score among over 427 food companies worldwide.
- At the third edition of the **Sustainable Food Awards,** held in 2025, we became **first place** in the "Regenerative Agriculture," "Digitalization and Artificial Intelligence in Food," and "Carbon Reduction and Management" categories.

SÜRDÜRÜLEBİLİR GIDA ÖDÜLLERİ

- At the 12th **Sustainable Business Awards** 2025, organized by the Sustainability Academy, we became first place in the manufacturing sector in the "Carbon Management and Net Zero" category, while at the 2025 **ISO Green Transformation Awards**, we became **first place** in the "Sustainability Strategy" category.

[3] TNFD - The Taskforce on Nature-related Financial Disclosures LEAP -Locate, Evaluate, Assess, and Prepare (LEAP) approach

HIGHLIGHTS OF 2025

VALUE CHAIN

- Through the Starling satellite monitoring system, implemented in collaboration with the Earthworm Foundation, we confirmed that the cocoa we sourced directly from **six** cooperatives came from **deforestation-free** areas.
- As part of the Biofortification Project conducted in collaboration with Sabancı University, in July 2025, we introduced to consumers a limited number of **Saklıköy Field-Enriched Whole Grain Biscuits** made from wheat treated with foliar applications of zinc and selenium.
- We allocated a total of TRY 495.5 million to R&D activities.
- We continued our Regenerative Agriculture in Wheat Project in Kırıkkale, Kırşehir, Çorum, Ankara, Aksaray, Yozgat, and Konya with a total of 101 farmers, including 18 farmers implementing **advanced regenerative** agriculture practices across **1,060 decares** and 83 farmers at the introductory-level across **5,800 decares.**
- As part of biological control efforts against the brown marmorated stink bug in hazelnut farming, we released **9,000 samurai wasps** in Piraziz, Bulancak, Keşap, Fatsa, and Çamaş.
- Since 2014, we have reduced a total of **16,756 tons** of carbon emissions in our logistics activities, achieving an overall 70% reduction in carbon output.
- We achieved **TRY 100 million in savings** in our logistics operations and reduced logistics costs by 4% compared to the previous year.

COMMUNITY

- In 2025, through the Beyond Hazelnut project, we supported a total of **200 farmers**, including 100 women.
- As part of the Beyond Cocoa project, our **"Mobile Health Service"** social responsibility initiative delivered healthcare to over 500 women and children in the regions where the cocoa-supplying cooperatives are located.
- Within the scope of our regenerative agriculture project, we provided **950 person*hours** of sustainable agriculture training to our wheat farmers on topics including pest management, crop rotation, climate risks, and farm economics.
- In 2025, we provided awareness training on the prevention of child labor to approximately **4,520 families** in Côte d'Ivoire and continued our school renovation efforts.
- We extended our collaboration with the Turkish National Paralympic Committee for another four years, through the Los Angeles 2028 Paralympic Games; we also supported the European Para Youth Games held in Istanbul and the World Abilitysport Beach Games as a main sponsor.

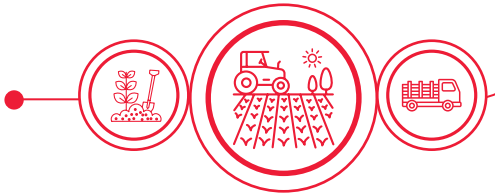
EMPLOYEES

- We delivered a total of **46,365 hours of training** to white-collar employees on leadership and management development, digitalization and artificial intelligence, sustainability, occupational health and safety, ethics, and diversity, equity, and inclusion, with total training investments amounting to **TRY 32,058,475.**
- We became the **first company in Türkiye** with more than 5,000 employees to receive the **EQUAL-SALARY Certification** awarded by the Switzerland-based **EQUAL-SALARY Foundation**.
- We received the **Top Employers Certification**, one of the world's most prestigious employer certifications, for the fourth consecutive year; achieving a score of **92.2%** in the certification process, we ranked in the top tier among the organizations assessed.
- Our corporate culture, centered on employee happiness, engagement, and a sense of trust, was also recognized with the **"Happy Place to Work"** certification; with an **overall score of 92.05**, we received the "Excellent Employee Experience Certificate and Award."
- At the international level, our achievements in human resources were recognized across multiple platforms, with one Gold and four Silver awards at the Globee Business & Impact Awards; four Gold, two Silver, and three Bronze awards at the Stevie Awards for Great Employers; one Gold and one Bronze award at the Stevie International Business Awards; and one Bronze award at the Brandon Hall Group Excellence Awards.

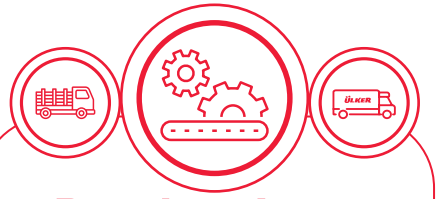
ÜLKER'S VALUE CHAIN

Procurement

- Procurement and process management of agricultural raw materials, including **wheat, hazelnuts, cocoa, vegetable oils, sugar, milk, and eggs**
- Procurement of packaging, services, and other goods from **2,076** suppliers, **94.4%** of which are local suppliers



Production



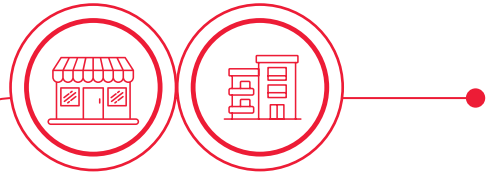
- Production in **13 factories, including 4 overseas**, with the contribution of **10,285**[4] employees.
- Annual production capacity of **1,300,000 tons** in domestic production facilities and **156,000 tons** in foreign production facilities
- An investment and expenditure **budget of TRY 198.1 million** dedicated to the development of a wide range of projects and initiatives related to climate change, energy efficiency, digitalization of occupational health and safety (OHS) processes, water efficiency, process optimization, circular economy, and environmental investments.

Logistics

- Distribution of products to sales points
- Route and vehicle fleet optimization
- Use of double-deck trucks
- First use of rail transport in Türkiye's fast-moving consumer goods sector for shipments
- Cross-dock[5] (X-Dock) locations positioned across different regions of the network



Sales and Marketing



- Export to over **100** countries with more than **300** brands
- Our products reaching every household in Türkiye
- Products reaching consumers through **thousands of different sales points**
- An average of **55 new products** launched for consumers each year
- **696,000 tons** of total sales volume

[4] The total number of employees in Türkiye, Kazakhstan, Egypt, and Saudi Arabia. The number of contractor employees is also included.
[5] Cross-dock (X-Dock) refers to logistics distribution points where products are transferred directly from inbound shipments to outbound shipments without being stored, thereby improving operational efficiency and reducing emissions in logistics processes.

SUSTAINABILITY JOURNEY

Extreme weather events and ecosystem losses directly threaten the food production chain, lowering agricultural productivity, disrupting raw material supply, and putting pressure on water resources. Rising temperatures and changing precipitation patterns are making the production of key agricultural inputs such as wheat, cocoa, and vegetable oil increasingly vulnerable. Indeed, in the World Economic Forum's (WEF) Global Risks Report, **extreme weather events and biodiversity loss** rank first and second among the most critical global risks over the 10-year horizon, while **AI-related disinformation and cyberattacks** once again underscore the significance of the risks associated with digital transformation. Geopolitical tensions and interstate conflicts, meanwhile, represent a structural risk factor that profoundly affects supply chains, energy security, and the balance of global trade[6].



At Ülker Bisküvi, we prioritize implementing initiatives that support positive transformation not only across our own operations but also across the sector and society. Building on the momentum of our sustainability efforts since 2014, we continue to strengthen our leadership in the food sector while steadily advancing toward our 2030 targets through our strategic approach focused on Our Planet, Value Chain, Employees, and Community.

By committing to the Science Based Targets initiative (SBTi) with our 2030 interim targets and 2050 net-zero commitment, we reinforced our leading position in our sector. To reduce the carbon footprint across our value chain, we are advancing the full transition to renewable energy, enhancing efficiency in logistics, and accelerating sustainable agriculture projects. Our net-zero journey not only ensures compliance with global regulations but also helps us gain a competitive edge and manage climate-related risks and opportunities effectively.

We embrace nature-based solutions in agricultural production to build climate-resilient food systems and lower our emissions. Through the regenerative agriculture practices implemented with our employees and partner farmers, we manage our environmental and social impact holistically.

Our ten-year journey toward the long-term targets we set in 2014 culminated in significant achievements. The progress we have made across a broad spectrum—from energy and water efficiency and packaging transformation to responsible sourcing and community projects—has made sustainability an integral part of our business model. Building on this strong foundation, we are focusing on our 2030 roadmap and advancing our transformation journey with more ambitious targets and broader impact.

[6] World Economic Forum Global Risks Report 2025

2030 TARGETS

STRATEGY AREA		TARGET	PROGRESS	SDGs	STATUS
OUR PLANET	**Adopting practices that embody a zero-waste corporate culture and lead in carbon-neutral and circular production models**	Reducing our net food losses to below 0.5%	By the end of 2025, we reduced our net food losses to below 0.57%.		>>>
		Achieving a total recovery of 50,000 m³ of water and wastewater compared to the 2014 base year	By the end of 2025, we achieved a total recovery of 47,130 m³ of water and wastewater compared to the 2014 base year, including 19,160 m³ in 2024.		>>>
		Achieving a 45% reduction in unit water consumption compared to 2014	In 2025, we achieved a 37% reduction in unit water consumption.		>>>
		Designing all packaging for recyclability by 2025	All our plastic packaging is free from composite structures.		✓
		Reducing our logistics-related carbon emissions by 30% compared to 2019	In our logistics activities, through the improvements implemented in 2025, we emitted 19,498 fewer tons of CO_2 compared to 2019, achieving 68% of our reduction target.		>>>
		Reducing Scope 1 and 2 emissions by 42% and Scope 3 emissions by 30% by 2030 compared to 2023 baseline under the SBTi commitment	Compared to the 2023 base year, in 2025 we reduced our Scope 1 and 2 emissions by 21% and our Scope 3 emissions by 6% across Ülker Türkiye (including raw material facilities) and our overseas facilities. Compared to the previous year, we reduced our Scope 1 and 2 emissions by 8.4% and our Scope 3 emissions by 4%.		>>>
		Using 100% of the electricity from renewable sources in our production facilities by 2025	In 2025, we sourced electricity from renewable sources at 100% of Ülker Türkiye facilities and 54% of our overseas facilities.		>>>
		Using 100% renewable electricity in all our warehouses by 2030	While efforts in line with this target are ongoing, we plan to take actions in accordance with the 2050 decarbonization roadmap.		>>>

[7] The relevant water recovery target has been revised to 50,000 m³ against the 2014 base year, taking into account the latest technical feasibility studies, the rigorous maintenance of food safety and high hygiene standards, and operational optimizations in strategic facility planning.

✓ The target has been achieved. >>> Progress is ongoing in line with the target. ⊗ Fell short of the target.

2030 TARGETS

STRATEGY AREA		TARGET	PROGRESS	SDGs	STATUS
VALUE CHAIN	**Supporting local agriculture by promoting regenerative and sustainable farming practices, with a focus on local development and farmer welfare**	Increasing the total use of domestic agricultural raw materials to 90%, excluding cocoa and vegetable oils	In 2025, our utilization rate of domestic agricultural raw materials reached approximately 83%[8] in terms of tonnage.	1 NO POVERTY, 4 QUALITY EDUCATION, 3 GOOD HEALTH AND WELL-BEIN, 6 CLEAN WATER AND SANITATION, 8 DECENT WORK AND ECONOMIC GROWTH, 12 RESPONSIBLE CONSUMPTION AND PRODUCTION, 13 CLIMATE ACTION, 15 LIFE ON LAND, 17 PARTNERSHIPS FOR THE GOALS	>>>
		Implementing regenerative agriculture practices on 10,000 decares with wheat producers under contract farming by the end of 2030	Within the project, advanced regenerative agriculture practices were implemented across 1,060 decares with a total of 101 farmers, representing a 10% completion rate toward the target.		>>>
		Ensuring the transition to sustainable farming practices in wheat and hazelnut production	In 2025, we expanded the scope of our Beyond Hazelnut project to 200 farmers, including 100 women. In wheat production, we expanded the scope of our Regenerative Agriculture project conducted with our contract farmers, scaling up regenerative agriculture practices.		>>>
		Sourcing 100% of key raw materials (cocoa and vegetable oils) from sustainable sources	Our parent company pladis achieved a 55% traceability to plantation (TTP[9]) rate in vegetable oil and verified deforestation- and conversion-free sourcing (DCF[10]), while in cocoa, under our Beyond Cocoa project, 100% of our direct sourcing from cooperatives came from no-deforestation verified (NDV[11]) areas.		>>>
		Ensuring that all critical suppliers fully comply with pladis Supplier Code of Conduct	By 2025, 82% of critical suppliers underwent independent social compliance audits.		>>>
		Implementation of agroforestry practices across 2,000 hectares by the end of 2030	Under the project, agroforestry practices have been implemented in Côte d'Ivoire, covering 2 cooperatives, 320 farmers, and 637 ha.		>>>

[8] In line with our approach that prioritizes working with local producers, 94.4% of all our suppliers are companies based in Türkiye.
[9] TTP (Traceability to Plantation): Ensuring product traceability up to the plantation, the first production point in the supply chain.
[10] DCF (Deforestation Conversion Free: Free from Deforestation and Land Degradation)
[11] NDV (No-Deforestation Verified): Verification of sourcing from areas where no deforestation has occurred.

✓ The target has been achieved. >>> Progress is ongoing in line with the target. ⊗ Fell short of the target.



2030 TARGETS

STRATEGY AREA		TARGET	PROGRESS	SDGs	STATUS
EMPLOYEES	**Promoting diversity, maintaining an inclusive work culture, and embracing the goal of being an employer of choice in the sector**	Increasing the ratio of female employees by 50%, raising it to 35% by 2030 Raising the ratio of female employees in management positions (Manager and above) to 40%	By the end of 2025, women accounted for 28.6% of all our employees and 33.1% of senior management.	4 QUALITY EDUCATION 5 GENDER EQUALITY 8 DECENT WORK AND ECONOMIC GROWTH 10 REDUCED INEQUALITIES 17 PARTNERSHIPS FOR THE GOALS	>>>
		Through our digital platform Thrive, we aim to equip 100% of our employees with the skills of the future and foster a culture of lifelong learning. Providing all employees with sustainability and nutrition training.	During the reporting year, the total resources allocated to training reached TRY 32 million, while our overall active usage rate reached 90%.		>>>
		Through our people-centered initiatives, we aim to maintain a strong employer brand by ranking among the top global employers across global platforms (e.g., Top Employer), and becoming the “employer of choice” in our industry.	As in previous years, Ülker received the Top Employers certification in 2025.		✓
		Ensuring the sustainability of the principle of equal pay for equal work by annually reviewing the salaries of employees in comparable positions to confirm pay equity between women and men	Through our commitment to equal pay for equal work, we earned the EQUAL-SALARY Foundation-awarded EQUAL-SALARY Certification.		✓



✓ The target has been achieved. >>> Progress is ongoing in line with the target. ⊗ Fell short of the target.

2030 TARGETS

STRATEGY AREA		TARGET	PROGRESS	SDGs	STATUS
COMMUNITY	**Promoting essential habits for a balanced life**	Identifying areas of need based on consumer demands, diversifying portions, and developing innovative products	In 2025, with our Ülker Altınbaşak Taco Flavored & Quinoa Snack product, we offered consumers another new baked, high-fiber product option. We launched our 8 Kek Orman Meyveli Mini product, which supports portion control. In January 2025, we entered a new category with the launch of the Ülker Go Ahead range, offering products that are both high in fiber and naturally sweetened with fruit, as well as an option containing 20% protein.		✓
		Reducing 3,000 tons of sugar, 1,000 tons of fat, and 50 tons of salt across all product categories compared to 2021	Compared to 2021, we reduced 10.05 tons of oil and 3,452 tons of sugar across all product categories. Among these, we achieved our target of reducing 3,000 tons of sugar by 2024.		>>>
		Achieving 100% compliance with responsible marketing principles across all brands	In advertisements aimed particularly at children, we ensure full compliance with established national and international standards and act in line with children's rights and ethical marketing principles.		>>>
		Supporting projects that encourage children to be active for a balanced life and instill an awareness of waste-free living from an early age	We supported the European Para Youth Games as the main sponsor.		✓
		Creating platforms for young people to discover their potential and supporting related projects	We support young talents through our recruitment initiatives, including the bizz@campus and Commercial Talent Recruitment programs.		✓

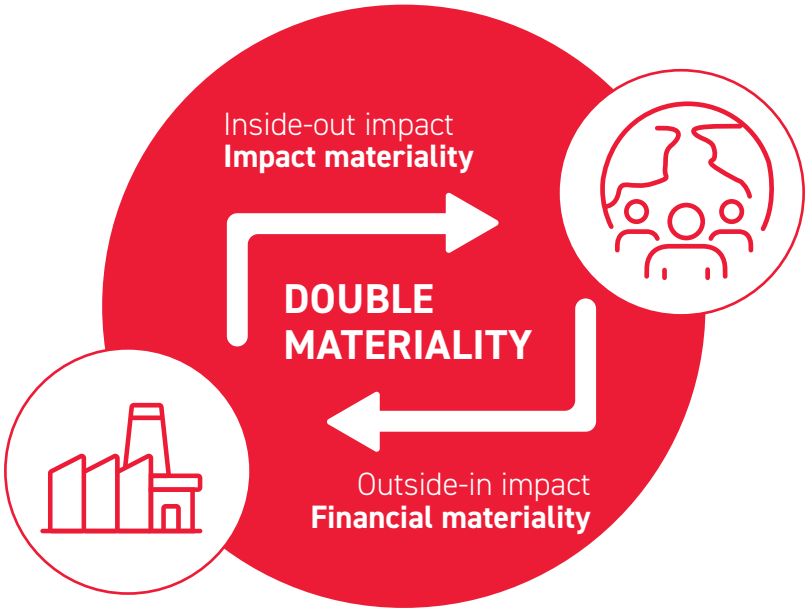
✓ The target has been achieved. >>> Progress is ongoing in line with the target. ⊗ Fell short of the target.



MATERIAL TOPICS

When identifying our material topics, we consider the current and future performance of our operations, the impacts of our activities on stakeholders across our value chain, and the global sustainability agenda together. This holistic perspective enables us to better understand stakeholder expectations and translate our sustainability efforts into tangible impact.

In the materiality analysis we updated in 2023 using the **double materiality approach**, we reassessed our impacts beyond our own operations, while also examining in depth how material topics affect our operations. By periodically updating this analysis, we aim to ensure that it regularly reflects changing stakeholder expectations, evolving regulatory expectations, and our company's changing risk and opportunity profile.



MATERIALITY ANALYSIS STEPS

In updating our materiality analysis through the double materiality approach, we followed the steps below.

Developing a long list of topics: We developed a long list of topics through a comprehensive literature review covering key issues in our sector.

Stakeholder analysis: As part of the stakeholder analysis conducted with an independent consulting firm, we asked various stakeholder groups—including employees, suppliers, customers, public institutions, universities, and non-governmental organizations (NGOs)—to prioritize the topics in the list through online surveys. Surveys were conducted in 2021, and consultations with key stakeholder groups were held in 2023. This process provided valuable data on the impacts of our business processes on these groups and our company's performance.

External trend analysis: In the external trend analysis, we evaluated the Sustainable Development Goals (SDGs), the World Economic Forum Global Risks Report 2025, the European Sustainability Reporting Standards (ESRS) Double Materiality Guidance Document, the Sustainability Accounting Standards Board (SASB) Materiality Map, the S&P Global Corporate Sustainability Assessment criteria, and the MSCI ESG Industry Materiality Map, as well as national reports such as Türkiye's Twelfth Development Plan, the Circular Economy Action Plan, and the Green Deal Action Plan.

Identifying double materiality impacts: In the impact analysis, the positive and negative impacts of each topic on society and the environment were assessed in terms of magnitude, scope, and likelihood.

Identifying material topics: Management insights and financial impact analysis played a critical role in identifying our material topics. In the four-stage impact analysis, each topic was assessed in terms of financial impacts and risks, regulatory effects, innovation opportunities, and sectoral examples for competitive advantage. In identifying material topics, we determined issues of shared significance by taking into account impact analysis, external trends, stakeholder views, financial impacts, and management insights.

Senior Management Approval: In the final stage, the updated materiality analysis was reviewed and approved by the Board of Directors and Senior Management.



Integration of Analysis Outcomes into the Enterprise Risk Management (ERM) Process

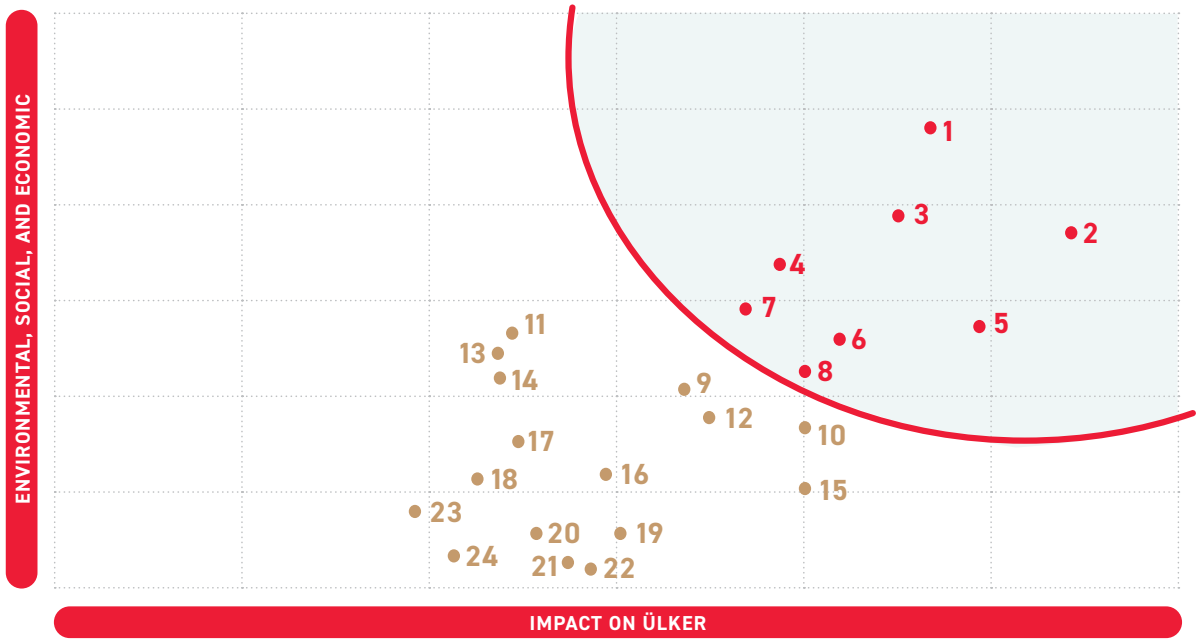
We assess our sustainability impacts, risks, and opportunities (IROs – Impacts, Risks and Opportunities) across the entire value chain. In line with ESRS requirements, we assess impact materiality based on magnitude, scope, and frequency of occurrence, and financial materiality based on the potential financial effects of these IROs on our business and their likelihood of occurrence. With the support of the Enterprise Risk Management function, the outcomes of the analysis are integrated into our Enterprise Risk Management (ERM) process, enabling the early identification and assessment of strategic, operational, and regulatory risks and opportunities related to sustainability and their integration into business decisions. Through this integration, material topics go beyond serving as a reporting tool and provide direct input into every stage of our business processes, from investment decisions and sourcing strategies to product development and stakeholder communication. Sustainability-related impacts, risks, and opportunities are periodically monitored by the corporate risk committee, and the identified findings are regularly reported to the Board of Directors and relevant committees.

Assessment of Materiality Analysis

According to the updated double materiality analysis, a large share of the high-priority topics identified in the previous analysis has remained significant for Ülker Bisküvi and its stakeholders. In particular, the topics of **"Climate Crisis"** and **"Raw Material Procurement"** were evaluated by our stakeholders as the highest-priority topics. Among **environmental topics, packaging management** and water use stand out, while in the **social and economic** areas, responsible sourcing, **R&D** and **innovation, balanced nutrition,** and **food safety** and **quality** come to the forefront. Compared to the previous analysis, water and wastewater shifted from being among the very high-priority topics to the broader priority list, while **responsible sourcing** gained prominence, ranking among the highest-priority topics. Similarly, **raw material procurement** gained even more significance compared to the previous year, becoming the second highest-priority topic.

In this analysis, the greater prominence of economic and social issues among the high-priority topics, compared to the previous analysis, shows a strong parallel with the changing global agenda and our company's sustainability strategy. In addition, we observed that social issues have risen in priority among the material topics compared to the previous period. Equal opportunity and diversity, talent management, and human rights have risen to higher-priority positions among the material topics.
Our report addresses in detail the high-priority topics identified for Ülker Bisküvi and its stakeholders and also provides information on the high-priority topics that rank highest in terms of impact. In addition, the Appendices section includes the material topics we addressed with each of our stakeholders and how we responded to these topics, presented under the heading **Appendix-2.**

DOUBLE MATERIALITY MATRIX



High-Priority Topics

Subject		Strategy Area
1	Climate Crisis	Our Planet
2	Raw Material Sourcing	Value Chain
3	Water	Our Planet
4	Responsible procuration	Value Chain
5	Packaging	Our Planet
6	Balanced Nutrition	Community
7	Food Safety and Quality	Value Chain
8	R&D and Innovation	Value Chain

RELATED SDGs

Material Topics

Subject		Strategy Area
9	Equal Opportunity and Diversity	Employees
10	Talent Management	Employees
11	Conservation of Biodiversity	Our Planet
12	Waste and Wastewater	Our Planet
13	Human Rights	Community
14	Local Socio-Economic Development	Community
15	Innovative Business Models and Entrepreneurship	Community
16	Employee Engagement and Satisfaction	Employees

Subject		Strategy Area
17	Responsible Marketing and Product Labels	Community
18	Occupational Health and Safety	Employees
19	Operational Excellence and Efficiency	Value Chain
20	Corporate Governance	Governance
21	Data Security	Governance
22	Integrated Risk Management	Governance
23	Ethics, Compliance, and Transparency	Governance
24	Animal Welfare	Value Chain

RELATED SDGs

HIGH-PRIORITY TOPICS IN THE CORPORATE VALUE CREATION PROCESS

Title	Impact on Ülker
Climate Crisis	Climate change directly affects the supply and cost of our key agricultural inputs such as wheat, cocoa, and vegetable oils. Supply constraints and price volatility affecting cocoa and vegetable oils sourced from abroad increase production costs, while also posing significant risks to product quality and the continuity of production and supply. **Impact Type: Cost**
Raw Material Procurement	The quality and continuity of supply of agricultural raw materials that are key inputs to our production processes, such as wheat, sugar, vegetable oil, and cocoa, are critical to product consistency. Potential supply disruptions affecting these raw materials, together with global market volatility, exchange rate fluctuations, and logistics costs—particularly for imported inputs—may create financial risks in terms of procurement costs and production continuity. **Impact Type: Cost**
Water	Water scarcity and deterioration in water quality threaten access to the water used in production processes, posing a risk of higher operational costs and disruptions to production continuity. It also creates supply chain vulnerabilities in the sourcing of water-intensive agricultural inputs. **Impact Type: Cost / Risk**
Responsible sourcing	Human rights violations, environmental harm, or unethical practices in the supply chain pose direct risks to brand reputation, regulatory compliance, and market access. **Impact Type: Risk**
Packaging	Increasing regulatory pressure and consumer expectations regarding packaging waste and single-use plastics directly affect product costs and market access. Obligations under Extended Producer Responsibility (EPR) and the Packaging and Packaging Waste Regulation (PPWR) entail additional costs. **Impact Type: Cost**
Balanced Nutrition	The strengthening of balanced nutrition trends creates the need for food companies to diversify their product portfolios and offer innovative solutions. As demand for products lower in sugar and fat and higher in fiber, vitamins, and minerals continues to grow rapidly, companies that fail to respond to this demand risk losing market share and growth opportunities. **Impact Type: Revenue**
Food Safety and Quality	Food safety violations may lead to product recalls, erosion of consumer trust, and serious legal sanctions, resulting in revenue and reputational losses. **Impact Type: Revenue**
R&D and Innovation	Changing consumer demands, increasing competition, and sustainability requirements necessitate the continuous renewal of the product portfolio. Insufficient investment in R&D may lead to a loss of market share and weakened competitiveness. **Impact Type: Revenue**

HIGH-PRIORITY TOPICS IN THE CORPORATE VALUE CREATION PROCESS

Title	Environmental, Social, Economic Impact
Climate Crisis	Greenhouse gas emissions from our production and supply chain contribute to global climate change, placing pressure on ecosystems and agricultural production systems. Extreme weather events intensified by climate change increase societal risks for farming communities and food supply security.
Raw Material Procurement	The production of critical raw materials such as cocoa, hazelnuts, wheat, vegetable oil, sugar, and milk causes environmental impacts including deforestation, water and soil pollution, and biodiversity loss. In the cocoa supply chain in particular, labor-intensive production can give rise to social risks such as child labor and unsafe working conditions.
Water	Water scarcity and quality degradation can adversely affect agricultural production and local communities' access to water. Our production activities in water-stressed regions may place additional pressure on local ecosystems and agricultural resources. We therefore prioritize practices that improve water efficiency and support circular water use.
Responsible sourcing	Practices within our supply chain directly affect workers' rights, fair working conditions, and the well-being of farming communities. Our suppliers' compliance with environmental and social standards is critical both for protecting human rights and for developing a sustainable sourcing ecosystem. Accordingly, we evaluate and support our suppliers within an ESG criteria framework.
Packaging	Packaging waste, particularly single-use plastics, creates significant pollution pressure on natural ecosystems and adds to the burden on societal waste management systems. Recyclable packaging designs aligned with circular economy principles reduce resource use and limit environmental impact. We therefore focus on making our packaging recyclable and reducing material use.
Balanced Nutrition	Consumer eating habits are changing in line with the pursuit of a balanced and wellness lifestyle, paralleling growing nutritional awareness across society. Ülker Bisküvi responds to this shifting consumer expectation by expanding options rich in vitamins, minerals, and fiber, with no added sugar.
Food Safety and Quality	Compliance with food safety standards directly protects consumer health and contributes to public health across society. Access to safe, quality food is especially important for children and vulnerable groups. Accordingly, we prioritize consumer trust and public health by ensuring full compliance with international food safety standards.
R&D and Innovation	Our product innovation and R&D investments respond to society's changing nutritional needs, contributing to the wider availability of higher nutritional value, more balanced food options. Innovative formulations also create economic value by accelerating the sector's sustainability transformation. We therefore direct our R&D investments toward innovation focused on consumer health and sustainability.

HIGH-PRIORITY TOPICS IN THE CORPORATE VALUE CREATION PROCESS

Title	Affected Areas / Stakeholders	Value Chain Impact
Climate Crisis	Environment, Society	Operations, Supply chain
Raw Material Procurement	Environment, Society, External employees (e.g. organizations in the supply chain, contractors)	Supply chain
Water	Environment, Society	Operations, Supply chain
Responsible sourcing	Society, External employees (e.g. organizations in the supply chain, contractors)	Supply chain
Packaging	Environment, Society, Consumers/end-users	Operations, Products/services
Balanced Nutrition	Consumers/end-users, Society	Products/services
Food Safety and Quality	Consumers/end-users, Society	Operations, Products/services
R&D and Innovation	Consumers/end-users, Society	Products/services

HIGH-PRIORITY TOPICS IN THE CORPORATE VALUE CREATION PROCESS

Title	Strategy
Climate Crisis	The climate crisis is one of the main focus areas of our sustainability strategy. In line with our 2050 net-zero target, we have established our decarbonization roadmap, developed in line with different climate scenarios and aligned with the Science Based Targets initiative (SBTi). Alongside the energy efficiency and renewable energy projects we implement in our production processes, we carry out initiatives that enhance ecosystems' carbon sequestration capacity through sustainable agriculture projects in the sourcing of wheat, cocoa, and vegetable oils.
Raw Material Procurement	As part of our "Beyond Cocoa" project, which supports the sustainable management of cocoa sourcing, we verify that the cocoa sourced from cooperatives we work with directly in Côte d'Ivoire comes from deforestation-free areas, while also supporting agroforestry practices. Under our Regenerative Agriculture Project, we improve soil health and keep fertilizer and water use under control through advanced regenerative agriculture practices across 1,060 decares (cover crops and hedgerows, reduced tillage, water efficiency, etc.)[12].
Water	Water efficiency projects to reduce water consumption, circular water use systems, and water footprint management practices in regions with high water stress are being implemented. Water-related risks are regularly assessed within the framework of CDP's Water Security program.
Responsible sourcing	Under the Supplier ESG Program, suppliers are assessed against environmental, social, and governance (ESG) criteria. Farmers are supported through sustainable agriculture projects, while EUDR compliance efforts and human rights due diligence activities are carried out.
Packaging	Material reduction and the use of recyclable materials are prioritized in packaging design. Packaging innovation continues in line with circular economy principles.
Balanced Nutrition	Balanced nutrition is at the heart of our product development strategy. Recognizing the diverse nutritional needs and preferences across society, we offer consumers delicious, nutrient-rich options that support portion control. We shape our roadmap based on consumer feedback as well as scientific data and methods, focusing on three key areas.
Food Safety and Quality	International food safety standards such as ISO 22000 and BRCGS are implemented at all our production facilities in Türkiye; the scope of ISO 22000 also covers our facilities in Kazakhstan, Egypt, and Saudi Arabia. Internal and external audits, risk-based quality management systems, and continuous improvement processes are implemented.
R&D and Innovation	We collaborate with academic institutions such as Sabancı University in the field of biofortification. R&D efforts to reduce sugar, fat, and salt in product formulations are ongoing. Functional and fortified product categories are being developed.

[12] Details of our projects related to key raw materials can be found in the Value Chain section of our report.

HIGH-PRIORITY TOPICS IN THE CORPORATE VALUE CREATION PROCESS

Title	Target
Climate Crisis	In line with our 2050 net-zero target and in accordance with the Science Based Targets initiative (SBTi), we aim to reduce our Scope 1 and 2 emissions by 42%, Scope 3 emissions by 30%, and FLAG emissions by 30.3% by 2030, compared to the 2023 base year.
Raw Material Procurement	Increasing the total use of domestic agricultural raw materials to 90% by 2030, excluding cocoa and vegetable oils. By 2030, sourcing 100% of our key raw materials (cocoa and vegetable oils) from sustainable sources. Implementing regenerative farming practices on 10,000 decares of cultivated land.
Water	Reducing unit water consumption by 45% by 2030 compared to the 2014 base year.
Responsible sourcing	Ensuring full compliance of critical suppliers with the Responsible Supply Chain Policy.
Packaging	Ensuring that 100% of plastic packaging is designed to be recyclable by the end of 2025.
Balanced Nutrition	By 2030, achieving a reduction of 3,000 tons of sugar, 1,000 tons of oil, and 50 tons of salt across all product categories.
Food Safety and Quality	Maintaining international food safety certifications across all production facilities.
R&D and Innovation	Identifying areas of need based on consumer demands, diversifying portions, and developing innovative products.

HIGH-PRIORITY TOPICS IN THE CORPORATE VALUE CREATION PROCESS

Title	Performance
Climate Crisis	Our total Scope 1 and 2 greenhouse gas emissions at Ülker's production facilities in Türkiye amounted to 84,648 tCO_2e, a 1.8% decrease compared to the previous year. Scope 3 emissions amounted to 1,873,124 tCO_2e, a 7% decrease compared to the previous year.
Raw Material Procurement	In 2025, out of a total of 2,076 suppliers we collaborated with, 94.4% were local suppliers. Payments to local producers accounted for approximately 58.49% of our total supplier payments. 100% of the cocoa we sourced directly came from deforestation-free sources. As of 2025, progress toward our 2030 regenerative agriculture target reached 10%.
Water	Compared to the 2014 base year, we achieved a 37% reduction in unit water consumption.
Responsible sourcing	By 2025, 82% of critical suppliers underwent independent social compliance audits. Compliance efforts are ongoing.
Packaging	All our plastic packaging is free from composite structures.
Balanced Nutrition	Compared to 2021, we reduced 10.05 tons of oil and 3,452 tons of sugar across all product categories. In January 2025, we launched the Ülker Go Ahead range, naturally sweetened with fruit and high in fiber.
Food Safety and Quality	All our factories are certified to ISO 22000 and BRCGS, and the validity of these certifications is maintained through regular audits.
R&D and Innovation	In 2025, R&D expenditure supporting our balanced nutrition initiatives amounted to TRY 10 million. The Ülker Go Ahead range was launched in January 2025, followed by the enriched with zinc and selenium in the field Saklıköy product in July 2025.

Executive Compensation
All sustainability KPIs defined through the sustainability platform are aligned with the targets approved by senior management on the climate crisis, raw material sourcing, and balanced nutrition, and are directly incorporated into the individual performance evaluations of managers and their teams, thereby influencing the salary and bonus process. These targets make up approximately 15% to 20% of the total individual objectives of each N-1 level leader[13]. The completion of SBTi[14] and EUDR[15] compliance plans, energy saving projects, increased technical training, balanced recruitment practices, profitability-focused decision making, and low employee turnover are among these objectives.

[13] An N-1 Level Leader refers to managers or leaders who are one level below the top-level manager (N) in the organizational hierarchy and report directly to them.
[14] Science Based Targets Initiative (SBTi)
[15] EU Deforestation Regulation (EUDR): The EU Regulation on the import and trade of products associated with deforestation.

EXTERNAL STAKEHOLDER IMPACT ASSESSMENT

MATERIAL TOPIC	BALANCED NUTRITION	FOOD SAFETY AND QUALITY	RAW MATERIAL SOURCING
Importance for External Stakeholders	Expanding options that support balanced nutrition across all product categories, such as Altınbaşak and Ülker Go Ahead, reducing sugar, salt, and fat content, and developing nutrient-rich products	Implementing international food safety standards in production processes and ensuring product quality	Reducing agriculture-related environmental impacts through regenerative farming practices and carbon footprint assessments
Cause of Impact	Reformulating products and introducing alternatives that support balanced nutrition directly contribute to enhancing the overall nutritional quality of consumers and society.	Compliance with food safety standards has a direct positive impact on public health by ensuring consumers' access to safe, high-quality products.	Limiting the negative impacts of agricultural production on nature, protecting soil health, and safeguarding farmers' livelihoods over the long term create lasting value for the environment and society.
Evaluated External Stakeholder Group	Consumers / End Users, Society	Consumers / End Users, Society	Supply Chain Workers/Farmers
Output Metric	Between 2021 and 2025, a total of 3,452 tons of sugar was reduced. The sugar reduction target was achieved as of 2025. Products with reduced sugar, fat, and salt account for 1% of revenue, while products rich in vitamins and minerals, fiber, and protein account for 8%.	All our factories are certified to ISO 22000 and BRCGS, and the validity of these certifications is maintained through regular audits. No product recalls occurred in 2025.	In 2025, a total of 101 farmers participated in the project, with advanced regenerative agriculture practices implemented across 1,060 decares and introductory-level activities carried out across 5,800 decares. In rainfed farming areas, wheat yield increased by 22% compared to the previous season, while fertilizer-related carbon emissions decreased by 10% and energy-related emissions by 4%. In irrigated areas, irrigation-related energy emissions decreased by 32%, while yield increased by 21%.
Impact Assessment	Access to products/services (positive impact)	Access to products/services (positive impact)	Environmental Value Creation
Description of the Assessed Impact	Expanding access to products that support balanced nutrition positively contributes to consumer health. This contribution positively impacts public health, especially by reducing diseases linked to excessive consumption of sugar, salt, and fat.	Ensuring consumers' access to safe, high-quality food.	The preservation of soil quality, support for biodiversity, and protection of farmer livelihoods deliver long-term benefits for natural ecosystems and rural communities.
Impact Metric	Increasing the share of products that support balanced nutrition in the total product portfolio (%)	Reduction in consumer complaint rate (%)	Increase in agricultural productivity (%)

CLIMATE AND SUSTAINABILITY POLICY IMPACT

At Ülker Bisküvi, we have established a management system covering all our operations in Türkiye, Egypt, Kazakhstan, and Saudi Arabia to ensure that our public policy engagement (lobbying) activities on climate and sustainability and our participation in trade associations are conducted in full alignment with our corporate sustainability and climate change policies and the goals of the Paris Agreement. This system manages the approval, monitoring, and reporting processes for public policy engagement and trade association participation under a defined procedure and ensures that corrective action is taken in the event of any non-compliance.

2025 Lobbying Activities Directly Related to Climate

At Ülker, in 2025, we actively contributed as an industry representative to policy processes directly related to climate and sustainability. We submitted written comments as part of the consultation processes regarding Türkiye's National Emissions Trading System and the 2053 Net Zero Mitigation Roadmap; through industry platforms, we also exchanged views with relevant institutions on the implications of the EU Carbon Border Adjustment Mechanism (CBAM) for the food sector. We carried out all these activities in alignment with the goals of the Paris Agreement and within the framework of our climate policy.

In addition to sustainability and climate change, we actively support the development of public policies that promote balanced nutrition, access to food, and sustainable food systems. We provided input on the EUDR (EU Deforestation Regulation) in the context of cocoa sourcing and on policies incentivizing regenerative agriculture.

In addition, no expenditures were made on political campaigns, referendums, or candidates.

Professional and Trade Associations

At Ülker, we contribute to policy processes that shape the climate agenda through our association memberships and collaborations. In this context, we play an active role in trade associations and organizations covering a wide range of topics, including climate change, technology and R&D, labor rights, supply chain, industrial development, environmental protection, sustainable development, and human rights.

Within the Business Council for Sustainable Development Türkiye (BCSD Türkiye), the regional network and partner of the World Business Council for Sustainable Development (WBCSD) in Türkiye, we carry out activities aimed at addressing the impacts of climate change on agricultural systems through the Sustainable Agriculture and Empowering Women and Young Farmers Working Group and the Agricultural Innovation Working Group.

DIRECT LOBBYING ACTIVITIES RELATED TO CLIMATE, SUSTAINABILITY AND FOOD SAFETY

Ülker is fully committed to supporting government policies aligned with the Paris Agreement and the UN Global Compact. We strictly comply with local regulations and our Code of Conduct when undertaking public policy engagement activities. The management procedures are as follows:

1. The objective of any public policy engagement activity must align with Ülker's sustainability and climate change policies and the goals of the Paris Agreement.
2. Each public policy engagement activity is first evaluated by the General Directorate of Public Relations and the Sustainability Platform and then submitted to the Sustainability Committee for final approval.
3. The Sustainability Platform is responsible for monitoring progress, sharing updates with the related departments, and reporting the results to the Sustainability Committee.
4. The Sustainability Committee regularly reports developments related to public policy engagement activities to the Board of Directors.

As part of our Sustainability Academy / Sustainable Food Platform membership, we actively contribute to the Food Waste and Management Working Group, the Transparency and Traceability Working Group, the Climate Change and Resource Management Working Group, and the Sustainable Supply Chain and Agriculture Working Group, while also supporting projects within these groups.

Trade associations are among the influential stakeholders consulted by governments and regulatory bodies when developing climate legislation. Therefore, we closely monitor the alignment of the advocacy activities of the organizations we are members of with our own climate policy. Relationships with trade associations are evaluated annually by the General Directorate of Public Relations and the Sustainability Platform. In this context, trade associations' alignment with the Paris Agreement is assessed in terms of the 2°C / 1.5°C targets, Net Zero 2050, energy conservation, and carbon reduction, while their policy proposals and activities are analyzed. In cases of non-compliance, a written objection is issued and, when necessary, various actions are taken, including withdrawal from membership.

Memberships and Collaborations

At Ülker Bisküvi, we prioritize contributing transparently to public policy development processes related to food safety, climate, and sustainability, and taking an active role in the industry associations, chambers of commerce, foundations, and platforms we participate in. We ensure that the activities carried out under these memberships are aligned with our company's sustainability strategies and global goals. Details of the organizations we are members of and our collaborations can be found in **Appendix 1** of our report.



2025 EVALUATION RESULTS

Contributions & Other Expenses

Category	Amount (TRY)[16]
Lobbying Activities	3,851,555
Climate-Aligned Trade Association and Lobbying (breakdown)	7,027,470
Lobbying Activities (sub-total)	10,879,025
Donations and Sponsorships	162,800,523
Total	173,679,548

[16] The data covers 100% of our operations.

Support and Collaboration Expenses

Subject	Institution	Climate Alignment	Corporate Stance	Participation Disclosure	2025 Expenditures (TRY)
Biofortification	Sabancı University	No non-compliance was identified.	Support / collaboration	We are collaborating with Sabancı University on the biofortification project.	3,500,000
No Deforestation Verification	Earthworm Foundation	No non-compliance was identified.	Support / collaboration	Satellite monitoring and verification activities to prevent deforestation in cocoa sourcing	4,216,827

Non-Governmental Organization (NGO), Trade Union and Other Expenditures (Other High Expenditures)

Institution	Type of Institution	Country/ Region	Climate Alignment	Opinion / Participation Disclosure	2025 Expenditures (TRY)
Turkish Food Industry Employers' Union (TÜGİS)	Employer's Union	Türkiye	No non-compliance was identified.	Sectoral consultation, balanced nutrition, responsible marketing, regulatory monitoring, and social dialogue related to packaging	760,500
Hazelnut Research Institute	Support / collaboration	Türkiye	No non-compliance was identified.	Collaboration on research into the impacts of climate change on hazelnut production	294,444
Business Council for Sustainable Development Türkiye (BCSD Türkiye)	Support / collaboration	Türkiye	No non-compliance was identified.	Activities on regenerative agriculture projects in hazelnut and wheat production under the Agricultural Innovation Project	98,000
Sustainability Academy	NGO / Platform	Türkiye	No non-compliance was identified.	Development of joint projects aimed at climate change mitigation, raising sustainability awareness, and building capacity for sustainability.	84,960
BCSD Türkiye – Endeavor High-Impact Entrepreneurship Program	Support / collaboration	Türkiye	No non-compliance was identified.	Collaboration platform activities with start-ups focused on climate change.	68,100

CORPORATE GOVERNANCE

At Ülker Bisküvi, we regard corporate governance as one of the key pillars of our approach to long-term value creation and the trust we have built with our stakeholders. Structured around the principles of transparency, accountability, fairness, and responsibility, our governance system brings discipline and effectiveness to our strategic decision-making processes while providing a strong and holistic governance framework fully aligned with our sustainability targets.

Board of Directors and Committees

Our Board of Directors sets our company's strategic direction, approves our long-term targets, and regularly monitors our performance. The Board provides effective oversight of sustainability, risk management, internal control, ethics, and compliance, while we deepen our assessment and reporting processes through the relevant committees. The committees operating under the Board of Directors carry out in-depth monitoring, evaluation, and reporting processes in their respective areas. We conduct the activities of our Board of Directors in a transparent, accountable, fair, and responsible manner in line with the Corporate Governance Principles. The principles and procedures governing the structure, duties, management rights, and powers of representation of the Board of Directors are set out in accordance with the provisions of the Company's Articles of Association. Our Company operates under a one-tier board structure, and we ensure that all members of the Board of Directors have timely and effective access to information regarding the Company and its management activities.

In 2025, by becoming a signatory to the United Nations Global Compact (UN Global Compact), we strengthened our commitment to universal principles in the areas of human rights, labor standards, the environment, and anti-corruption.



Ahmet Bal
Chairman of the Board
(Non-Executive Member)
(Independent Member)



Yahya Ülker
Vice Chairman
(Executive Member)



Mehmet Tütüncü
Member of the Board of the Directors
(Executive Member)



Sridhar Ramamurthy
Member of the Board of the Directors
(Executive Member)



Özgür Kölükfakı
CEO - Member of the Board of the Directors
(Executive Member)



İbrahim Taşkın
Member of the Board of Directors
(Executive Member)



Füsun Kuran
Member of the Board of Directors
(Non-Executive Member)
(Independent Member)



Pınar Ilgaz
Member of the Board of Directors -
(Non-Executive Member)
(Independent Member)

You can access the biographies of our Board of Directors members here.[17]

[17] The independent and non-executive members of our Board of Directors hold no more than two external directorships at publicly listed companies. In this context, only external directorships at publicly listed companies are taken into account; positions held at private companies, academic institutions, and non-profit organizations are not considered under "other roles." The Board of Directors monitors members' external commitments to ensure that they do not interfere with the effective performance of their duties.

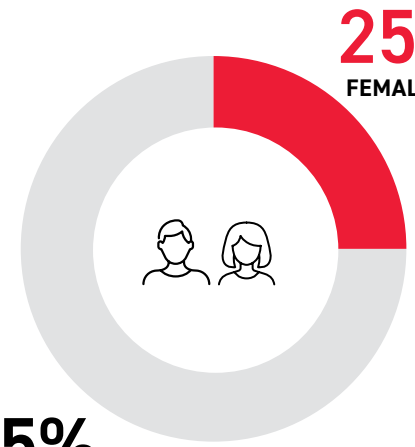
100%

2025 Board Meeting Attendance

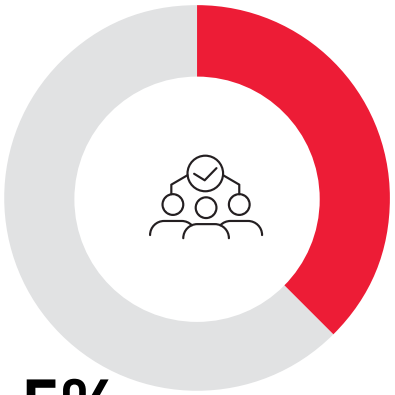
3 Years

Average Tenure

Ülker Board of Directors Gender Distribution



Ülker Board of Directors Independent Member Ratio



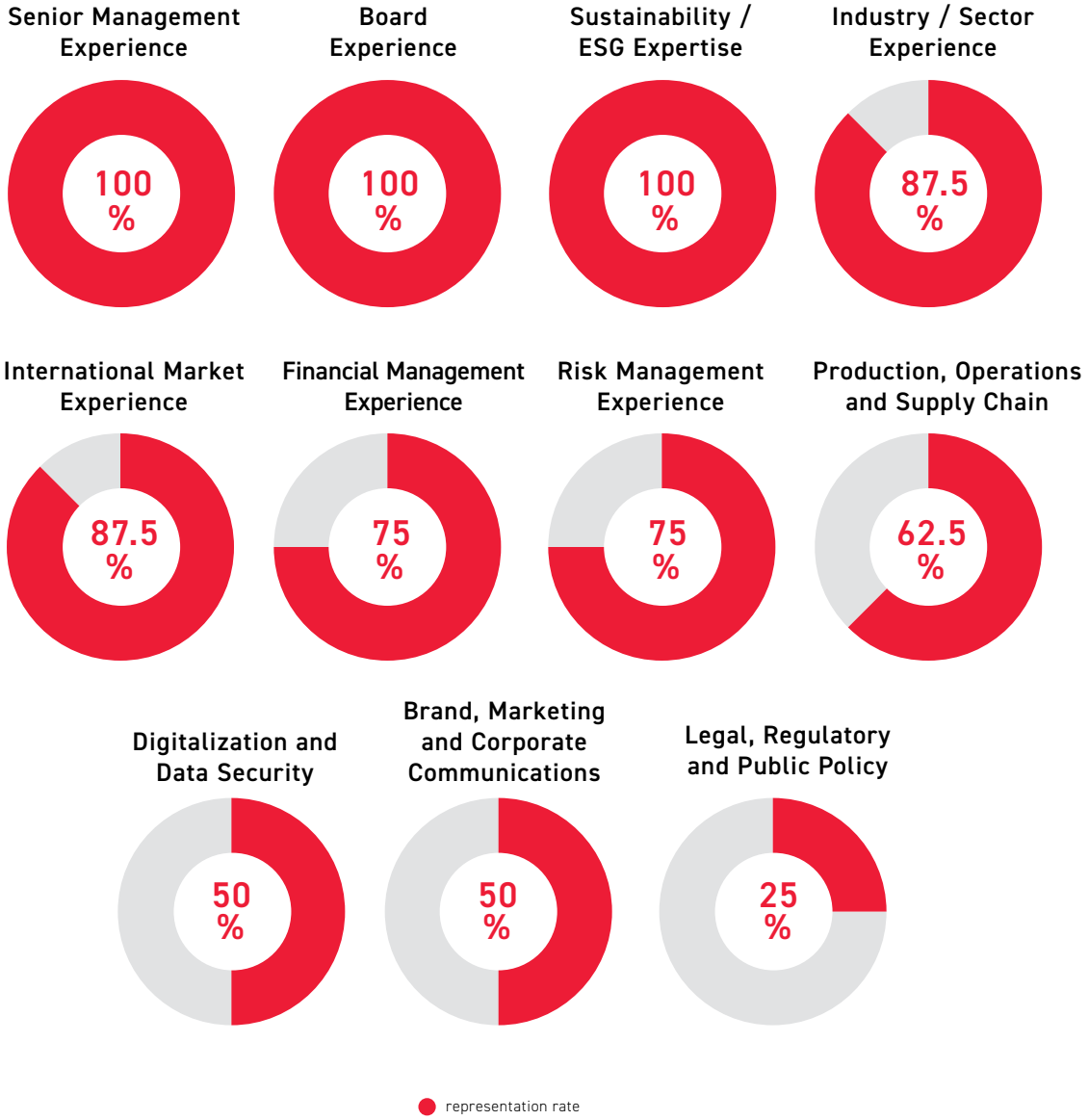
We assess the composition of our Board of Directors against a comprehensive competency framework that considers the balance of independence and includes industry and international experience, financial expertise, knowledge of legal, regulatory and public policy matters, experience in production, operations and supply chain management, risk management experience, sustainability/ESG (Environmental, Social and Governance) expertise, and competencies in brand, marketing and corporate communications. We regularly review our Board's average tenure, attendance rates, and committee effectiveness, and assess its composition and competency structure in line with our long-term strategic needs.

The Ülker Bisküvi Board of Directors is composed of members with extensive industry experience, the majority of whom are non-executive. The Board of Directors consists of eight members, three of whom are independent members in accordance with the regulations of the Capital Markets Board (CMB). Our Board of Directors includes two women, meeting our target of 25% female representation on the Board, and we continue our efforts to increase this proportion.

Each member of the Board of Directors has between 9 and 44 years of professional experience across food, fast-moving consumer goods (FMCG), finance, manufacturing, supply chain, and corporate governance. Our Board of Directors has an average of 32 years of industry experience. Our Board of Directors includes members with operational or strategic-level experience in the food and fast-moving consumer goods (FMCG) sector. In this context, our Board of Directors includes three independent, non-executive members with industry experience.

Detailed information on the industry experience and tenure of our Board members is available in the relevant document on the Ülker Bisküvi Investor Relations website. The Competency Matrix is provided in **Appendix 4.**

Board Competency



Our Audit, Corporate Governance, and Early Detection of Risk Committees uphold the principles of transparency, accountability, and effective internal control while supporting our goals for sustainable value creation. Through the Sustainability Committee, which we established at the end of 2024, we address environmental, social, and governance (ESG) matters at the strategic level and regularly monitor our performance. Through the Cybersecurity and Information Security Board, the Ethics and Human Rights Committee, and the Personal Data Protection Executive Committee, which operate to strengthen our governance structure, we adopt a more specialized and proactive approach to risk and compliance. Detailed information on the members of each committee, their responsibilities, areas of authority, and annual activities can be found in the table provided in **Appendix 3.**

CEO Succession Planning and Incentive Structure

We implement a structured CEO succession plan to ensure leadership continuity and support our long-term strategic objectives. Under this plan, the Board of Directors identifies potential internal leaders and supports their development, while also maintaining a framework for evaluating an external candidate pool when necessary. Our Corporate Governance Committee, which is also responsible for nominations, regularly reviews the succession plan and assesses its alignment with our sustainability commitments, food safety standards, and innovation targets.

Our CEO variable compensation structure is directly linked to predefined and measurable corporate performance metrics. These metrics include key financial indicators such as EBITDA, EBITDA margin, and cash flow. In addition to financial indicators, these metrics also include relative performance measures such as sales, market share, and digitalization performance. While the weighting assigned to each metric remains confidential, this structure closely aligns the CEO's compensation mechanism with the company's financial results and shareholder value creation, supporting effective leadership and long-term sustainable growth. Performance assessments take into account both annual results and multi-year value creation. Through this structure, we align the CEO incentive mechanism with our company's financial sustainability and stakeholder value creation. You can access the Ülker Bisküvi Remuneration Policy **here.**

SUSTAINABILITY GOVERNANCE

We coordinate the activities carried out under our sustainability strategy through the Sustainability Committee, which we established at the end of 2024 as a board level governance body, and the Sustainability Platform, which operates under the Committee. Our Sustainability Committee is authorized by the Board of Directors, which also appoints its members. We structure the Committee to include at least one independent member of the Board of Directors and to consist of non-executive Board members. Having the Committee chaired by an independent member of the Board of Directors helps us establish a robust oversight and impartial assessment framework for sustainability and climate matters.

The Committee's members include the CEO as well as independent members of the Board of Directors. The Vice President of Sustainability contributes to the Committee's work in an advisory capacity, supporting the development of our sustainability roadmap, the setting of long-term targets, and performance monitoring. Our Investor Relations Director serves as the Committee Secretary. This structure creates a direct link between the Board of Directors' strategic guidance role and execution processes. Our Committee meets at least twice a year and more frequently as needed; we document meeting agendas, decisions, and action plans in writing.

Our Sustainability Committee defines our sustainability priorities, strategies, and short-, medium-, and long-term goals and targets, and submits the resulting roadmaps and policies to our Board of Directors for approval. Our Committee monitors compliance with local and global regulations, oversees our reporting



in line with the Capital Markets Board's Sustainability Principles Compliance Framework, and regularly assesses our sustainability performance. At the same time, our Committee supports the integration of a sustainability culture throughout the organization and, when necessary, establishes sub-working groups to enhance implementation effectiveness. We review our sustainability investments and budget plans and report them to the Board of Directors.

Our senior management plays an active role in managing sustainability- and climate-related risks and opportunities. We plan energy efficiency investments, training and development programs, packaging R&D activities, and sustainable sourcing projects for critical raw materials such as hazelnuts, cocoa, and wheat under senior management oversight, and monitor them through our annual business plans.

The Ülker CEO leads the implementation of our sustainability strategy, structured around the pillars of our Planet, Value Chain, Community, and Employees, as well as our climate strategy set out in our Decarbonization Roadmap. The Ülker CEO regularly

monitors sustainability- and climate-related targets and performance metrics and reports developments to the Board of Directors. At the same time, as a member of the Sustainability Committee, he contributes to the Committee's work and chairs the Sustainability Platform, coordinating the implementation of Committee decisions across business units.

Reporting to the Committee, our Sustainability Platform is composed of managers responsible for R&D, Production, Human Resources, Logistics, Procurement, Operational Excellence, Corporate Communications, Marketing, Investor Relations and Finance, Quality and Food Safety, Health, Safety and Environment (HSE), and Enterprise Risk Management. Through this structure, we ensure the implementation of our sustainability policies, monitor performance metrics, strengthen coordination across business units, and regularly report progress to the Board of Directors. The Board of Directors approves all our sustainability targets, including our climate strategy, while the Ülker CEO closely monitors the implementation of strategies and action plans.

Since 2018, we have incorporated our sustainability performance metrics into the target scorecards of our department managers and employees. These metrics are used in the performance evaluations of all our managers, including the CEO. At the end of the year, we assess corporate and individual performance together; measure performance against the targets we have set in areas such as energy efficiency, procurement of sustainable raw materials, growth without an increase in carbon emissions, and talent management; and shape our incentive mechanisms accordingly under the oversight of the Board of Directors.

Our Sustainability Platform, composed of experienced and specialized managers, develops strategies and implements practices that help us achieve our sustainability targets. Each business unit carries out activities within its area of responsibility, while the Sustainability Committee shapes our sustainability vision by ensuring that these efforts are embraced at the strategic level. For detailed information on the competency areas of the Platform members, please refer to **Appendix 10.**

PLATFORM MEETINGS

Our Sustainability Platform meets four times a year to monitor progress toward our sustainability targets and assess areas for development. Where we deem necessary, we update our targets and roadmaps.

Platform meetings, which review progress and successful practices outlined in the roadmaps of our sustainability strategy, are held every three months with the participation of 13 departments. Where needed, we review our targets and roadmaps and make updates accordingly.

At our meetings in 2025, we conducted a comprehensive review of sustainability- and climate-related risks and opportunities, progress in key performance metrics, ongoing projects, and planned investments. We assessed the relevant risk areas and emerging developments and provided guidance where necessary. We regularly shared progress on the roadmaps developed in line with our sustainability strategy, as well as successful practices implemented across our business units.



BOARD OF DIRECTORS

Ahmet Bal
(Chairman of the Board – Independent Board Member)

Yahya Ülker
(Vice Chairman of the Board)

Mehmet Tütüncü
(Member of the Board of the Directors)

Sridhar Ramamurthy
(Member of the Board of the Directors)

Özgür Kölükfakı
(CEO - Member of the Board of the Directors)

İbrahim Taşkın
(Member of the Board of Directors)

Füsun Kuran
(Member of the Board of Directors - Independent Member)

Pınar Ilgaz
(Member of the Board of Directors - Independent Member)

CEO

EARLY DETECTION OF RISK COMMITTEE

AUDIT COMMITTEE

CORPORATE GOVERNANCE COMMITTEE

SUSTAINABILITY COMMITTEE

- **Pınar Ilgaz /** Committee Chair
  Board Member (Independent)
- **Ahmet Bal /** Committee Member
  Chairman of the Board (Independent)
- **Füsun Kuran /** Committee Member
  Board Member (Independent)
- **Özgür Kölükfakı/** Committee Member
  Board Member / CEO



Committee Secretariat and Advisory

- **Süheyl Aybar/** Advisor
  Vice President of Sustainability
- **Verda Beste Taşar /** Committee Secretariat
  Investor Relations Director

SUSTAINABILITY PLATFORM
Chair: CEO

MARKETING | OHS | ENVIRONMENT AND ENERGY | PRODUCTION | R&D | HUMAN RESOURCES | CORPORATE COMMUNICATIONS | OPERATIONAL EXCELLENCE | QUALITY AND FOOD SAFETY | PROCUREMENT | LOGISTICS | ENTERPRISE RISK MANAGEMENT | INVESTOR RELATIONS AND FINANCE

RISK MANAGEMENT

At Ülker Bisküvi, we view corporate governance as a key element of our long-term success and stakeholder trust. We view risks not merely as potential threats, but as factors that could affect our ability to achieve our strategic targets, transform our business model, and shape stakeholder trust. In this context, we assess financial and non-financial risks within an integrated framework and implement enterprise risk management as a management discipline embedded throughout the organization.

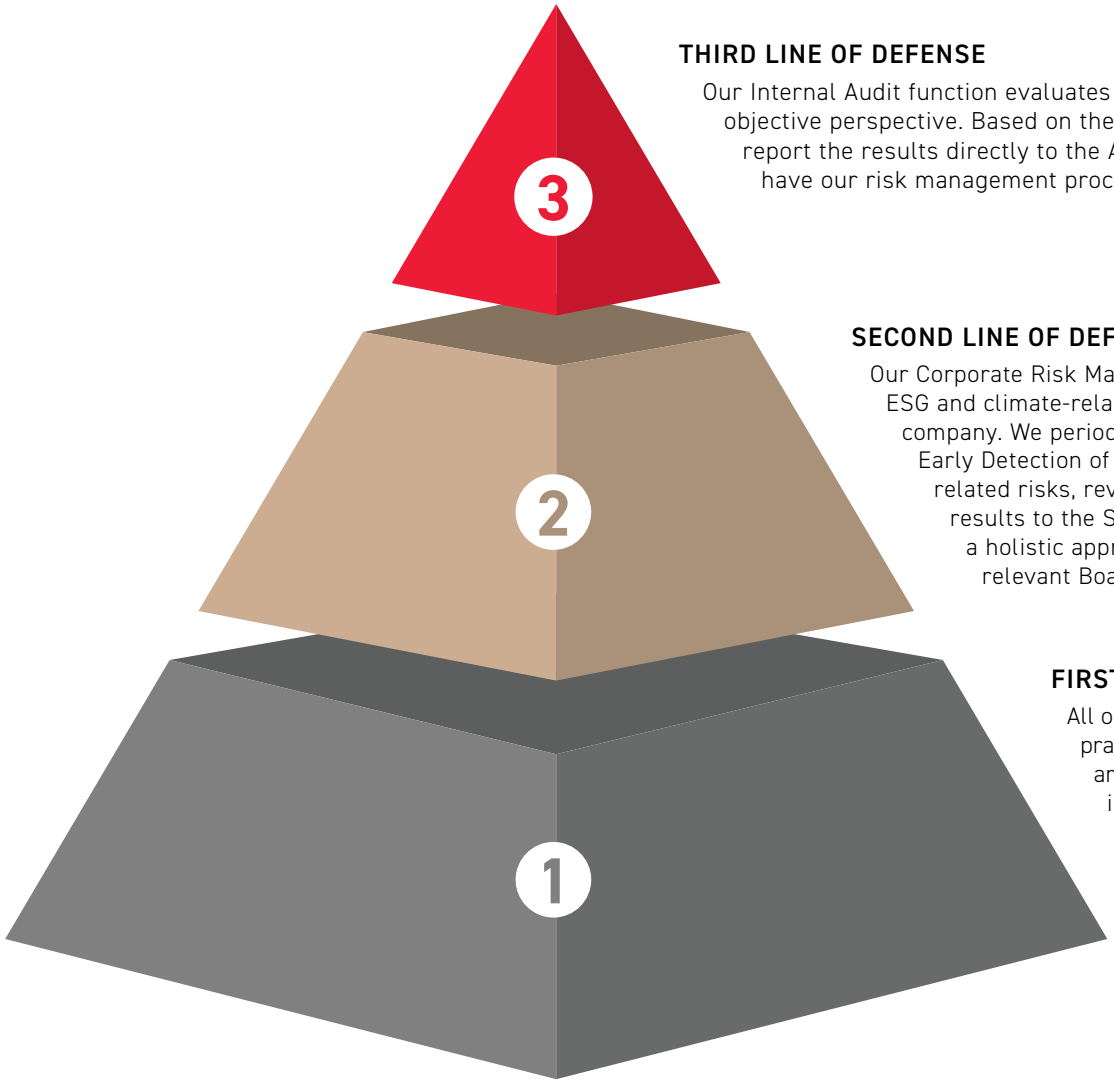
Corporate Risk Management Approach

We carry out our risk management activities in accordance with international standards, particularly ISO 31000, through the Corporate Risk Management Department and under the oversight of the Board of Directors. Through the Early Detection of Risk Committee, we regularly assess the risks to which we may be exposed and ensure that the necessary guidance is provided and action plans are monitored in line with our risk appetite 8. Through the Sustainability Committee, we address environmental, social, and governance risks and opportunities in alignment with our strategy and integrate the assessment results into senior management decision-making processes. We consider ensuring the consistent and effective implementation of risk management across the company to be one of our key areas of responsibility. In crisis management, which also covers reputational risks, the Yıldız Holding Media Crisis Communication Regulation is applied across the Group. This structure, which covers a broad range of risks, particularly occupational accidents, environmental issues, cybersecurity, product quality, and financial developments, is based on a two-tier structure comprising the Crisis Signal Assessment Committee and the Crisis Management Committee. Through early warning mechanisms, crisis signals are identified before they escalate into crises, while timely and accurate information is provided to all relevant stakeholders under the coordination of Corporate Communications. The procedures are reviewed regularly.



[18] Refers to the level of risk we deem appropriate to assume in order to achieve our strategic, operational, and financial targets, while taking stakeholder expectations into account.

We apply the Three Lines of Defense model in risk management.



THIRD LINE OF DEFENSE

Our Internal Audit function evaluates the activities of the first and second lines of defense from an independent and objective perspective. Based on these assessments, we monitor the action plans developed to mitigate risks and report the results directly to the Audit Committee. To complement our Three Lines of Defense structure, we also have our risk management processes assessed by third parties as part of independent external audit services.

SECOND LINE OF DEFENSE

Our Corporate Risk Management function coordinates and monitors all risk management activities, including ESG and climate-related risks, to ensure the effective execution of risk management processes across the company. We periodically report developments regarding all risks included in our risk inventory to the Early Detection of Risk Committee. We work with our Sustainability Platform to assess ESG and climate-related risks, review first-line practices as part of our second-line oversight, and also present the results to the Sustainability Committee. Thus, we monitor financial and non-financial risks through a holistic approach and regularly communicate significant matters to senior management and the relevant Board-level committees.

FIRST LINE OF DEFENSE

All our business units are responsible for implementing sustainability- and climate-related practices within their respective areas of activity. As risk owners, we treat risks that may arise during our activities as an integral part of our day-to-day operations and directly integrate them into our risk management processes. In this context, alongside all risks related to our processes, we identify, assess, and monitor Environmental, Social, and Governance (ESG) and climate-related risks and opportunities, and take the necessary actions. As the first line of defense, we are responsible for proactively managing risks and regularly report relevant developments to our respective senior management.

Internal and External Audit Processes

Under the Türkiye Sustainability Reporting Standards (TSRS), our sustainability- and climate-related risk management processes undergo independent third-party audits annually, enabling us to regularly review the effectiveness of these processes.

Risk management processes are subject to continuous audit. Our Internal Audit function regularly reviews and evaluates risk management activities embedded in our processes as part of company-wide audits conducted under a risk-based audit approach. As part of these assessments, we analyze the adequacy of our risk identification, measurement, monitoring, and reporting processes. Based on the findings, we implement the necessary improvements and strengthen our practices. Where we deem appropriate, we supplement our risk management framework with independent third-party assessments.

In addition, internal and external audits are conducted annually in the areas of environment, occupational health and safety, and quality. These audits assess the effectiveness of the relevant management systems, enable the early identification of non-compliances, and provide a basis for process improvements. Audit findings are integrated into the enterprise risk management framework, enabling identified risks to be managed systematically and the necessary actions to be implemented by the relevant business units.

RISK CULTURE

To strengthen governance around risk management principles across the company, we reinforce our risk culture by providing regular enterprise risk management training to all employees, including senior management. Through these trainings, we aim to raise the existing level of risk awareness, build a shared understanding across the organization regarding the early identification and effective management of risks, and further strengthen our consistent and effective risk management culture throughout the organization. In addition, we prepare quarterly risk bulletins covering key economic and geopolitical developments at the global and national levels, as well as outlooks on significant risks, and share them with our senior management.



We position risk management as an integral part of our strategic decision-making processes. We systematically assess risks at every stage of our product and service development processes, from the design stage through to market launch, using the life cycle approach we have adopted. We make regulatory compliance, food safety, continuity of raw material supply, supply chain resilience, and traceability criteria an integral part of our development processes. In our new product development and reformulation processes, we analyze potential regulatory changes, supply chain vulnerabilities, and the impacts of products on nutrition and consumers at an early stage.

We support risk management through financial incentive mechanisms by linking our variable remuneration criteria not only to financial indicators, but also to risk-based indicators such as regulatory compliance, supply chain resilience, and progress toward environmental and social targets.

Through this holistic approach, we proactively identify uncertainties at an early stage, manage their impacts, and build a strong and resilient risk culture that adapts to changing conditions.

Risk Inventory

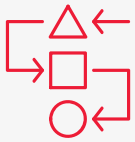
We classify our risks under the categories of strategic, financial, operational, compliance/regulatory, and sustainability risks. We conduct a comprehensive review of our risk inventory at least twice a year and update it in response to significant developments that arise during the year. When developing our risk inventory, we assess risks based on their likelihood of occurrence and potential impact and plot the results on the risk matrix. For the likelihood dimension, we consider the frequency and probability of a risk occurring; for the impact dimension, we consider its effects on financial outcomes, operational continuity, reputation, and compliance. We monitor prioritized risks more frequently and regularly track the action plans developed together with the relevant risk owners.



We assess our **strategic risks** in relation to changes in consumer preferences, market regulations that could affect competition and market share, factors that could affect our business model, and geopolitical developments, among others. We closely monitor the impacts of growing expectations around balanced nutrition and transparency on our business model and review our product portfolio and innovation processes accordingly.



We assess our **financial risks** in relation to fluctuations in foreign exchange rates, interest rates, inflation, and commodity prices, and manage them through natural hedging and financial instruments.



We address our **operational risks** in relation to supply chain disruptions, quality processes, information security threats, and other factors that may affect business continuity, and make investments to enhance our resilience.



Within the scope of **compliance risks**, we closely monitor key and emerging national and international regulations and ethical obligations across the geographies in which we operate, provide regular training to our employees, and strengthen our ethical culture.

SUSTAINABILITY AND CLIMATE-RELATED RISKS

We manage environmental and social sustainability risks, particularly climate change, in an integrated manner within our enterprise risk management framework. We analyze climate-related physical and transition risks that may arise across our entire value chain, from raw material sourcing to logistics activities, and assess their impacts on our operational continuity and cost structure. We summarize below our key climate-related risks and opportunities, together with the relevant strategy areas and our management approach. For details on the assessments, particularly the financial impact of risks and the costs of responding to risks, please refer to our **TSRS Report.**

Financial Materiality Assessment of Risks and Opportunities

The short-term, medium-term, and long-term financial impacts of sustainability and climate-related risks and opportunities are assessed from a financial materiality perspective. The annual EBITDA performance is used as the basis for impact classification, and impacts exceeding 3% of EBITDA are considered financially material.

RISK/OPPORTUNITY LIKELIHOOD	
Likelihood Level	**Duration, Year**
Likely	0-2
Possible	2-5
Probable	5-8
Rare	8-10
Remote	10+

RISK/OPPORTUNITY IMPACT		
Financial Impact Level	**EBITDA Percentage (%)**	**EBITDA Impact Amount (Million TL)**
Extremely Low	≤1.00	<185
Low	1.01–3.00	185 - 549
Medium	3.01–5.00	550 - 899
High	5.01–10.00	900 - 1,799
Extremely High	>10.00	>1,800



SUSTAINABILITY AND CLIMATE-RELATED RISKS

1. RISKS ARISING FROM EXTREME WEATHER EVENTS

Category	**Physical Risk - Acute**
Strategy Area	Our Planet, Value Chain
Value Chain Position	Upstream - Direct Operations - Downstream
Impact	Extremely Low
Likelihood	Probable
Term	Medium
Risk	Extreme weather events such as floods, storms, heatwaves, or fires may cause physical damage to our production facilities or disrupt raw material procurement, thereby affecting production continuity.
Our Approach	At all our facilities, we implement Emergency Plans, strengthen physical safeguards through fire suppression and chemical spill prevention systems, and cover potential property damage and business interruptions through insurance. We enhance supply resilience by maintaining appropriate inventory levels for critical raw materials and using AI-powered route optimization, and aim to increase the share of domestic agricultural raw materials (excluding cocoa and vegetable oils) to over 90% by 2030. In our Regenerative Agriculture projects, we monitor fields using satellite-based monitoring and sensors, providing farmers with early warnings of extreme weather conditions. We did not experience any operational losses due to extreme weather events during the reporting period.

2. WATER MANAGEMENT RISK

Category	**Physical Risk - Chronic**
Strategy Area	Our Planet, Value Chain
Value Chain Position	Upstream – Direct Operations
Impact	Extremely Low
Likelihood	Probable
Term	Medium
Risk	Reduced water availability and quality at our facilities and agricultural sourcing operations in regions with high water stress may lead to lower raw material yields and operational disruptions.
Our Approach	We manage water risks holistically through digital monitoring, water efficiency practices, and water recovery investments. Through rainwater harvesting, wastewater and steam condensate recovery, and repairs to address water losses and leaks, we reduced unit water consumption by 37% compared to the 2014 base year. By 2030, we aim to achieve a 45% reduction and a total recovery of 50,000 m^3 of water and wastewater. We analyze facility-level water risks annually using the WRI Aqueduct and WWF Risk Filter tools and reflect the actual cost of water in our investment decisions through internal water pricing in regions with high water stress. We did not experience any disruptions in production due to water stress during the reporting period.

SUSTAINABILITY AND CLIMATE-RELATED RISKS

3. EU DEFORESTATION REGULATION (EUDR) COMPLIANCE RISK

Category	**Transition Risk - Policy**
Strategy Area	Our Planet, Value Chain
Value Chain Position	Direct Operations - Downstream
Impact	Low
Likelihood	Probable
Term	Medium
Risk	If the production processes of products such as cocoa and vegetable oils are associated with deforestation, this may result in restricted access to the EU market and reputational losses.
Our Approach	Since 2016, in collaboration with the Earthworm Foundation, we have monitored our cocoa supply chain through the Starling Satellite Monitoring System and field audits. As of 2025, through our Beyond Cocoa program, we sourced 100% from no-deforestation verified (NDV) areas). By 2030, we aim to source 100% of our key raw materials, particularly cocoa and vegetable oils, from sustainable and deforestation-free sources (our DCF - Deforestation Conversion Free - rates currently stand at 40% for vegetable oils and 15% of our total cocoa purchases). We prioritize sources certified by RSPO (Roundtable on Sustainable Palm Oil), Rainforest Alliance, and FairTrade, and maintain zero tolerance for practices that violate the NDPE (No Deforestation, No Peat, No Exploitation) Policy. We have integrated EUDR compliance targets into senior management performance criteria.

4. PACKAGING AND PACKAGING WASTE REGULATION (PPWR) COMPLIANCE RISK

Category	**Transition Risk - Policy**
Strategy Area	Our Planet, Value Chain
Value Chain Position	Upstream - Direct Operations - Downstream
Impact	Low
Likelihood	Possible
Term	Short
Risk	The need to modify packaging design due to mandatory PCR content requirements and bans on certain polymers under the PPWR; restricted access to the EU market in the event of non-compliance.
Our Approach	Under our 2025 Packaging Roadmap, all our plastic packaging is now free from composite structures. Through our projects to transition from multilayer composite structures to mono-material structures (Çokokrem tube/blister, Çokomel blister), we eliminated the use of 423 tons of difficult-to-recycle material. We have planned the phase-out of PVC and completed the technical planning for the transition to PET and paper-based alternatives. In the doypack (stand-up flexible packaging) format of our Godiva Masterpieces products, we began using 30% post-consumer recycled (PCR) plastic material. We validate our packaging performance through ISCC (International Sustainability and Carbon Certification) and EPD (Environmental Product Declaration) processes.

SUSTAINABILITY AND CLIMATE-RELATED RISKS

5. CARBON PRICING MECHANISMS COMPLIANCE RISK

Category	**Transition Risk - Policy**
Strategy Area	Our Planet
Value Chain Position	Upstream – Direct Operations
Impact	Extremely Low
Likelihood	Possible
Term	Short
Risk	The emergence of greenhouse gas emissions-related obligations under the EU ETS, the Carbon Border Adjustment Mechanism (CBAM), and national carbon pricing regulations.
Our Approach	Under our Decarbonization Roadmap, we systematically implement projects that directly reduce fossil fuel use. Through oven conversions, steam system upgrades, equipment efficiency improvements, and loss and leakage reduction initiatives, we achieved total natural gas savings of 683,436 Sm^3[19], thereby reducing our Scope 1 emissions. In the medium to long term, we plan to deploy biogas, green hydrogen, and carbon capture technologies, and prioritize projects with high emissions reduction potential by applying a shadow carbon price of €50/ton CO_2 in our investment decisions. We are not currently directly subject to any carbon pricing mechanism.

6. SOURCING RISKS RELATED TO ENVIRONMENTAL AND SOCIAL ISSUES

Category	**Transition Risk - Market**
Strategy Area	Our Planet, Value Chain
Value Chain Position	Upstream – Direct Operations
Impact	Low
Likelihood	Probable
Term	Medium
Risk	Identification of non-compliances such as deforestation, biodiversity loss, child labor, or human rights violations in the supply chains of key raw materials such as cocoa, vegetable oils, and hazelnuts, potentially resulting in reputational loss or the need to switch to new suppliers.
Our Approach	Through our Ethics and Human Rights Committee, we manage the risks of human rights violations across the value chain, integrate environmental, social, and governance (ESG) criteria into all supplier selection, contracting, and evaluation processes, and digitally monitor performance through the Supplier Relationship Management (SRM) system. In 2025, 28 critical suppliers underwent on-site audits by independent third parties; no supplier contracts were suspended or terminated. In cocoa-growing regions, we monitor child labor through the Child Labor Monitoring and Remediation System (CLMRS) and implemented remedial actions in all identified cases. Through our Beyond Cocoa, Beyond Hazelnut, and Regenerative Agriculture in Wheat projects, we strengthen traceability, support for farmer incomes, and sustainable agriculture, and prioritize sources certified under RSPO, Rainforest Alliance, FSA, and FairTrade. We closely monitor regulatory developments through our Regulation Department within the R&D function, our Sustainability Directorate, as well as through our memberships in business associations and our active participation in working groups.

[19]Standard Cubic Meter: A unit used to measure gas volume under fixed reference conditions that are unaffected by changes in temperature and pressure.

SUSTAINABILITY AND CLIMATE-RELATED RISKS

7. NEW TECHNOLOGY ADOPTION RISK

Category	**Transition Risk - Technology**
Strategy Area	Our Planet, Value Chain, Employees
Value Chain Position	Direct Operations
Impact	Extremely Low
Likelihood	Probable
Term	Medium
Risk	The need to transition to advanced technology systems and applications across operational processes and the supply chain.
Our Approach	We prioritize our investments using the SIRI and COSIRI digital maturity assessments and manage the associated risks in a controlled manner by first deploying advanced technologies, such as IoT (Internet of Things) and Industry 4.0, in pilot plants before rolling them out across all our facilities. Under the Yıldız Excellence Path (YMY), we achieve efficiency gains without requiring major investments through Lean Manufacturing and Six Sigma methods, while using satellite and sensor technologies across our supply chain through Agriculture 4.0. We support our employees' adaptation to new systems through the ODAK (Focus) Project and VR-enabled Digital Training Centers, and collaborate on technology development projects with universities (Sabancı University, Ankara University, and ITU) and TÜBİTAK. Through the PROTWIN Project, we contribute to an international scientific network on alternative protein sources under the coordination of TÜBİTAK, while continued our biofortification studies in collaboration with Sabancı University.

8. RISK OF ACCESS TO SUSTAINABLE FINANCE

Category	**Transition Risk - Financial Markets**
Strategy Area	Our Planet
Value Chain Position	Upstream – Direct Operations
Impact	Extremely Low
Likelihood	Probable
Term	Medium
Risk	Restricted access to sustainability-linked financing and increased borrowing costs due to failure to achieve our sustainability targets or insufficient transparency or performance in this area.
Our Approach	We link our financing structure to environmental performance; under Sustainability-Linked Loans (SLLs) and Sustainability-Linked Bonds (SLBs), we apply interest rate benefits linked to the achievement of our emission reduction targets and structure our framework in line with ICMA principles. Our ESG performance is validated on international platforms: In the **LSEG** (London Stock Exchange Group) ESG assessment, we ranked first in the food sector with a **score of 95**; in the S&P Global Corporate Sustainability Assessment, we scored 80, placing us in the top 3%, and were included in the Sustainability Yearbook for the fifth consecutive year. We have integrated our emission reduction targets validated by the Science Based Targets initiative (SBTi) into our performance and remuneration system across management levels, from the CEO to department managers; in line with our 2050 Net Zero vision, we regularly monitor progress against our Decarbonization Roadmap.

SUSTAINABILITY AND CLIMATE-RELATED OPPORTUNITIES

1. EMERGING NUTRITION TRENDS AND SUSTAINABLE PRODUCT PORTFOLIO

Category	Market
Strategy Area	Our Planet, Community
Value Chain Position	Downstream
Impact	Low
Term	Short
Opportunity	Expanding our market share by enriching our product portfolio with sustainable products aligned with emerging nutrition trends.
Our Approach	In response to the "Well-Being" trend, we reformulate our products to enhance their nutritional value; compared to 2021, we have reduced a total of 10.05 tons of fat and 3,452 tons of sugar across all product categories, and we reduced consumers' sugar intake by approximately 278 tons. In 2025, we launched the Saklıköy "Field-Enriched" Biscuit, enriched with zinc and selenium through the biofortification project developed in collaboration with Sabancı University. Through the Ülker Go Ahead range, bars with 20% protein, and our mini product formats, we address consumers' needs for balanced diet and portion control. We are positioning our more balanced products as low-carbon products, creating an opportunity in the EU market.

2. FOOD AND NON-FOOD WASTE REDUCTION / CIRCULAR ECONOMY

Category	Resource Efficiency
Strategy Area	Our Planet, Value Chain
Value Chain Position	Direct Operations - Downstream
Impact	Extremely Low
Term	Short
Opportunity	Increasing energy and resource efficiency by reducing food and non-food waste and reintegrating it into the circular economy.
Our Approach	With our "Waste-free Corporate" culture, we convert 99.5% of our raw materials into finished products and reduced our net food losses to below 0.57% in 2025. We convert our production-related waste into animal feed, while organic waste from our cafeterias into biogas through biomethanization. All our facilities in Türkiye are certified "Zero Waste to Landfill"; our waste recycling rate reached 99.4% at Ülker Türkiye's finished product factories and 99.9% at Ülker Türkiye's raw material factories. We reduced plastic use by 96 tons and paper use by 25 tons. We improve material efficiency by transitioning from composite to mono-material structures in our packaging and all our plastic packaging is now free from composite structures.

3. ENERGY AND WATER EFFICIENCY

Category	Resource Efficiency - Resilience
Strategy Area	Our Planet
Value Chain Position	Direct Operations
Impact	Extremely Low
Term	Short
Opportunity	Increasing operational efficiency through energy and water efficiency investments and strengthening resilience to water stress.
Our Approach	Through modernization and efficiency projects across our cooling, motor, compressed air, and thermal process systems, we achieved energy savings of 12,011,142 kWh in 2025 and reduced Scope 1 and 2 carbon emissions per unit of production by 51% compared to 2014. In Türkiye, we achieved 100% I-REC-certified renewable electricity use across all our finished product and raw material production facilities; we aim to extend this to all our warehouses by 2030 and installed solar panels with a total capacity of 31.5 kWp in 2025. On the water side, through process optimization and recovery projects, we achieved water savings of 26,759 m^3 and reduced unit water consumption by 37% since 2014; expanded the Blue IT digital water monitoring system, and, we began meeting 10% of the facility's water consumption through wastewater recovery at our Silivri facility.

EMERGING RISKS

Emerging Risk	**AI-Enabled Misinformation and Cybersecurity Risks**
Risk Type	Technological
Risk Description	In the future, the rapid and largely uncharted advancement of generative AI is expected to significantly transform companies' operations, communication practices, and decision-making processes. While AI technologies offer significant potential for efficiency and innovation, their accelerating adoption is giving rise to new risks that extend beyond traditional IT and cybersecurity risks. The rapid proliferation of AI technologies, together with evolving regulations and increasing public scrutiny, is creating a risk landscape that is still taking shape and whose impacts are expected to become more pronounced over the long term. In the period ahead, biased or misleading outputs, the inadvertent spread of misinformation, intellectual property infringements, and AI-enabled social engineering attacks may put pressure on corporate reputation, stakeholder trust, and regulatory compliance.
Potential Impacts	As a company that interacts directly with consumers, we may be exposed to AI-related risks through their potential impact on consumer trust. For the Company, this risk may materialize in the future through consumers being misled in marketing communications, digital channels, and visual content production, as well as the erosion of brand trust. The misuse of advanced artificial intelligence technologies (generative AI) may result in the rapid creation and dissemination of misleading, manipulated, or entirely fabricated content relating to the Company's brand, products, executives, or supply chain—such as deepfake videos, fake announcements, manipulated social media posts, or fabricated product recall reports—posing a risk of adverse impacts on the Company's reputation, trust, market position, and operational continuity. On the other hand, AI-enabled next-generation cyber threats may place additional pressure on information security by increasing risks such as impersonation, data breaches, and unauthorized attempts to access systems.
Actions Taken	To address these future risks, the Company continues to step up its efforts to strengthen its AI governance and information security approach. Efforts to establish principles for the responsible use of AI are ongoing, decision-making processes incorporating human oversight are being reinforced, and data governance and access controls are being enhanced. In addition, cybersecurity measures are being updated to address emerging AI-related threats, while emerging AI regulations and stakeholder expectations are closely monitored. In this context, to ensure the accuracy and integrity of publicly available information, the Company acts in accordance with the **Information Security Policy**, which has been made publicly available. As the Company reports in accordance with national and international standards and is a publicly traded company, publicly disclosed data undergo internal control processes and, where necessary, are subject to independent third-party audit. This structure significantly limits the risk of material errors or misleading content in the disclosure of data and information. In addition, in line with its Responsible Marketing strategy, the Company makes it a priority to provide its stakeholders with accurate and reliable information on product quality, production processes, and sustainability performance, and adheres to responsible marketing principles through a transparent and accountable communication approach. As part of this approach, the Company has publicly affirmed its commitment to responsible communication by signing the National Food and Beverage Alliance Türkiye Commitment Statement.

EMERGING RISKS

Emerging Risk	**Operational/Commercial Risks Arising from Global Geoeconomic Tensions and Polarization**
Risk Type	Geopolitical
Risk Description	The global system is increasingly moving toward an "age of competition" defined by rivalry and confrontation rather than cooperation. Beyond existing geopolitical tensions, geoeconomic rivalries and polarization are expected to have more structural and lasting impacts on trade, investment, supply chains, and access to natural resources in the coming years. States treating food security as a national security issue and imposing sudden export quotas or bans on critical agricultural inputs ("resource nationalism"), trade alliances/blocs adopting increasingly divergent regulations, and the expansion of economic sanctions could lead to a fragmented and unpredictable global trading system. This risk is not limited to current conflicts; it could have far-reaching impacts, extending to a structural reshaping of the economic system as practices such as export restrictions extending beyond tariffs, disruptions to ports and logistics routes, state intervention in access to critical inputs, and the cancellation of contractual obligations become more widespread.
Potential Impacts	For the Company, this risk may, in the future, lead to difficulties in accessing raw materials and commodities and create cost pressures. In parallel, potential increases in energy prices, delays along logistics routes, and higher insurance and financing costs may place additional pressure on operational efficiency. For the Company, which has a trading network spanning multiple geographies, this risk could result in adverse commercial outcomes through cost pressures arising from higher raw material and commodity prices and restricted access to these inputs, as well as market access restrictions resulting from the increased and/or more widespread application of quotas and embargoes.
Actions Taken	To strengthen its resilience to these geoeconomic developments, the Company takes a holistic approach to its procurement, operations, and financial planning processes. The Company adopts a local sourcing approach across its supplier portfolio, with local suppliers accounting for 94.4% of its supplier base. For critical imported inputs such as cocoa and vegetable oil, alternative sourcing routes are being established and strategic inventory management is being implemented. Through our Beyond Cocoa and Beyond Hazelnut programs across the agricultural supply chain, we support climate resilience in production regions. By integrating geoeconomic risks into procurement and supply chain planning, the Company aims to remain agile in an increasingly polarized global trading environment. To strengthen energy supply security and enhance resilience to fluctuations in global energy prices, the Company has commissioned rooftop solar power plants and continues its planning studies for ground-mounted solar power plant projects.

EMERGING RISKS

Emerging Risk	**Risk of Access to and Employment of Skilled Labor Arising from Forced Migration and Climate Change-Induced Labor Displacement**
Risk Type	Social
Risk Description	Climate change is expected to increasingly drive forced migration and labor displacement, particularly in agricultural regions exposed to impacts such as extreme heat, drought, and water stress. Unlike more widely recognized climate risks, this emerging risk manifests through social and human capital channels that affect workforce availability, working conditions, and community stability. As climate pressures intensify in the coming period, population movements and workforce disruptions are expected to become more frequent and less predictable.
Potential Impacts	For the Company, this risk may, in the coming period, affect both agricultural production and operations at its production facilities across the value chain. Climate change-related extreme heat, drought, and deteriorating living conditions may trigger forced migration in agricultural regions, thereby weakening workforce continuity in raw material production. In parallel, across the different geographies in which the Company operates, demographic dynamics such as migration-related challenges in accessing skilled labor, declining interest among young people in the manufacturing and agricultural sectors, and an aging workforce may pose long-term risks to production continuity and operational efficiency.
Actions Taken	The geographic diversity of our production facilities provides a structural advantage that enhances operational resilience to regional climate- and workforce-related impacts. In addition, workforce planning practices are implemented to enhance production flexibility, while our capacity to maintain a backup workforce is strengthened through operator training, master–apprentice development programs, and multi-skilling approaches. To address sudden workforce shortages that may occur during harvest and peak production periods, we aim to minimize the operational impact of workforce losses by implementing process improvements, particularly shift optimization, digital production planning infrastructure, real-time data monitoring systems, and production aligned with a flexible shipment model. To mitigate the impacts of climate change on agricultural production and rural livelihoods, we aim to expand regenerative agriculture practices across 10,000 decares of land where we operate by 2030. In this context, our Regenerative Agriculture in Wheat Project, launched as a pilot in Kırıkkale in 2024, was expanded to Kırıkkale and Konya as of 2025 and continued with 101 farmers, covering 1,060 decares under advanced regenerative agriculture practices and 5,800 decares at the introductory level. Through digital agriculture tools, training, and field support, actions are being implemented to support farmers' adaptation to climate stress, productivity, and income stability, with a view to reducing the risk of involuntary workforce displacement over the long term.

SUSTAINABLE FINANCE

In line with our sustainable finance approach, we directly link our sustainability targets with financial performance metrics and structure our Sustainable Finance Framework accordingly, in accordance with the Sustainability-Linked Bond Principles published by the International Capital Market Association (ICMA) and the Sustainability-Linked Loan Principles established by the Loan Market Association (LMA).

The performance targets set within the framework include concrete and measurable commitments toward our Net Zero 2050 target. By 2030, we aim to reduce our Scope 1 and Scope 2 greenhouse gas emissions at our five production facilities in Türkiye by 42% compared to the 2021 base year, and our Scope 3 emissions by 30%. We report our progress toward these targets in the **Sustainability Journey** section.

Sustainability-Linked Loan

While our sustainability efforts are recognized on national and international platforms, it is highly important for us to reflect our sustainability approach in our financial strategies and decisions. Accordingly, in 2023, we signed a **sustainability-linked syndicated loan** agreement totaling USD 248 million. In October 2025, we further strengthened our financial structure by refinancing this syndicated loan secured in 2023, ahead of its 2026 maturity. Accordingly, under the global coordination of J.P. Morgan, with Emirates NBD and Standard Chartered Bank serving as joint sustainability coordinators, we signed a new USD 250 million syndicated loan agreement with the participation of 11 international banks, featuring a five-year maturity and bullet repayment of the principal at maturity.



For our EUR 75 million **sustainability-linked loan** secured in 2023 under the leadership of the European Bank for Reconstruction and Development (EBRD), the interest rate is adjusted annually based on our performance. The financing provided by the EBRD has been assessed as aligned with the mitigation and adaptation goals of the Paris Agreement, and **the full amount of the financing is classified as green finance**. Under this loan, according to the Compliance Certificate published for 2023, we achieved all four environmental performance targets. Under this loan, we are updating our sustainability-linked loan framework in line with the **Sustainability-Linked Loan Principles** to include more ambitious performance indicators and sustainability performance targets. In November 2025, we are refinancing our existing loan secured in 2023 ahead of maturity through a new EUR 75 million, five-year loan agreement with the EBRD.

At the beginning of 2024, we diversified our financing sources supporting our sustainability investments by signing a EUR 75 million **sustainability-linked loan agreement** with the International Finance Corporation (IFC). In November 2025, we signed a new agreement with IFC to extend the maturity of this loan from two years to five years. With this restructured loan, we continue to strengthen our sustainable investment partnerships with international development finance institutions.

Sustainability-Linked Bond

With our sustainability-linked bond structure, we are addressing our environmental targets within a concrete framework of responsibility. With our USD 550 million **sustainability-linked bond issuance** with a 7-year maturity, launched in 2024, we are strengthening our strong position in the international capital markets.

ETHICS AND HUMAN RIGHTS

We conduct our operations in line with high ethical standards and the principle of respect for human rights. The Ethical Principles Procedure forms our core framework, covering business ethics, human rights, prevention of discrimination, prevention of harassment and mistreatment, management of conflicts of interest, bribery and corruption, data privacy, anti-money laundering, and business integrity. We consider these principles binding on all our employees, as well as on the suppliers and business partners with whom we work. Our colleagues can access the Ethical Principles Procedure through our website and via Human Resources.

You can access the **Ülker Bisküvi Ethical Principles Procedure** here.

In 2025, Ülker became a signatory to the United Nations Global Compact. As part of this membership, we manage our business processes in line with the Ten Principles in the areas of Human Rights, Labour, Environment, and Anti-Corruption, placing ethical values and respect for human rights at the core of our sustainability approach. Our approach to protecting human rights, ensuring fair and safe working conditions, preventing child and forced labor, reducing environmental impacts, and upholding transparency and ethical conduct constitutes a core part of our commitment to building a sustainable and responsible business model across our entire value chain.



In our ethics and human rights management, we also act in accordance with the following international principles and frameworks:

- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- OECD Guidelines for Multinational Enterprises
- International Bill of Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- United Nations Women's Empowerment Principles (WEPs)

WHISTLEBLOWING MECHANISM

We use our Ethics and Compliance Hotline to provide a safe and accessible mechanism for reporting ethical violations. Reports can be submitted via whistleblowing.pladisglobal.com anonymous reports are also accepted.

We publicly define the responsibilities relating to the whistleblowing mechanism and safeguard our commitments to confidentiality and personal data protection under the Ethical Principles Procedure. We have zero tolerance for retaliation and are committed to protecting individuals who raise concerns in good faith. To strengthen ethical compliance, we regularly communicate our policies to all employees and uphold our ethical responsibilities at the senior management level. To enhance the effectiveness of the whistleblowing mechanism and support our employees' confident participation in the process, we conduct training programs that provide information on how to report ethical violations.

Under pladis TURCA, we embrace a work culture founded on ethical values. Across all our sites, including Ülker Bisküvi's production facilities in Türkiye and abroad (Egypt, Saudi Arabia, and Kazakhstan), we provide a safe and accessible reporting mechanism that encourages the disclosure of actions violating the Ülker Bisküvi and pladis Codes of Conduct. Our employees can confidentially and anonymously report potential violations via the whistleblowing.pladisglobal.com platform, which is operated by an independent third party and available 24/7.

Reports received undergo a preliminary assessment by our Human Resources and Legal departments, with confidentiality maintained throughout the process. Prioritized reports are listed by the Human Resources Department and reported in writing to the Chairman of the Board. The Chairman of the Board, where necessary, seeks input from the Legal, Internal Audit, and Human Resources departments to assess the severity of the violation and refers the matter to the Yıldız Holding Global Honor and Ethics Board. Following the preliminary assessment, reports deemed to require further action are referred to our Ethics and Human Rights Committee and, where relevant, to Internal Audit, and proceed to a formal investigation.

Upon completion of the investigation, decisions such as disciplinary action, warnings, termination of employment, or supplier sanctions are implemented in accordance with established procedures; criminal consequences may also arise in line with legal requirements. Our Ethics Board meets every two months to review the reports received and reports sanction decisions and systemic risks to senior management and the relevant governance bodies.

We classify reports received through the ethics hotline by subject area. Reports may cover areas such as human rights, discrimination, and conflicts of interest. As of 2025, all finalized reports were managed within this process, and all reports received through the ethics hotline across our operations in Türkiye and abroad were resolved. Over the last two financial years, no ethical violations involving bribery and corruption or money laundering were identified within the Company. Therefore, no sanctions, legal proceedings, fines, or administrative actions related



to these matters were recorded. As of 2025, no lawsuits have been filed against our Company in relation to environmental, social, and governance (ESG) matters. In this context, no public lawsuits were filed, and in line with ethical principles, no donations or support were provided to politicians or political parties during the same year. Our reporting and evaluation mechanisms on ethical principles are applied globally, covering our operations in Türkiye as well as in Egypt, Saudi Arabia, and Kazakhstan.

We continue our training programs to raise awareness of ethics and human rights. In 2025, 191 of our new employees received a total of 287 hours of training on basic ethical principles, including human rights, as well as anti-bribery and anti-corruption, conflicts of interest, and gifts and hospitality practices. These trainings were conducted under the following topics: General Ethical Principles (174 hours), Anti-Bribery and Anti-Corruption (50 hours), Conflicts of Interest (50 hours), and Gifts and Hospitality Practices (13 hours). During the same period, 223 of our employees participated in a total of 223 hours of training on the Law on the Protection of Personal Data. We design all our training programs in line with the Ülker Bisküvi Ethical Principles Procedure and the pladis Global Code of Conduct, supporting our employees in recognizing ethical risks, reporting violations in a timely manner, and acting in accordance with ethical principles in their business processes.

We manage our relationships with stakeholders across our value chain in accordance with the Ülker Bisküvi Ethical Principles Procedure and the pladis Global Supplier Code of Conduct. We conduct regular training to ensure that our suppliers integrate these principles into their business processes. We conduct social compliance audits to monitor adherence to human rights across our supply chain. Additionally, through internal audits within the Supplier ESG Program and the Beyond Cocoa project, we ensure that production and working conditions comply with ethical and human rights standards. We provide details of these practices across our value chain in the **Value Chain** section.

Ethics issue	**Number of incoming reports**				
Country	**Türkiye**	**Egypt**	**Saudi Arabia**	**Kazakhstan**	**Total**
Discrimination	6	1	4	0	11
Conflicts of interest	1	0	0	0	1
Bribery and Corruption, Money Laundering	0	0	0	0	0
Customer Data Privacy	0	0	0	0	0
Abuse of Position	2	0	4	8	14
Human rights	6	0	3	5	14
Causing Loss to the Company	1	0	0	0	1
Other	1	0	0	0	1



ANTI-BRIBERY AND ANTI-CORRUPTION

Our anti-bribery and anti-corruption approach is defined within the **Ülker Bisküvi Code of Conduct and the pladis Global Code of Conduct** and sets out a clear stance against all forms of bribery and corruption. We adopt a zero-tolerance approach to bribery and corruption. Under the **policy**, we apply clear and binding rules in areas such as relations with public officials and third parties, gifts and hospitality practices, and donation and sponsorship processes. The Company's Board of Directors is the decision-making body responsible for approving the business ethics processes under the Ülker Code of Conduct and ensuring their ownership at the highest level. On behalf of senior management, the Audit Committee is responsible for overseeing Ülker's anti-corruption and corporate integrity system. The compliance management process operates through a direct reporting line to the Board of Directors, and this mechanism ensures senior management accountability for corruption risk management. All our employees are expected to fully comply with these standards, while we ensure that the third parties we do business with operate within the same ethical framework.

Further details are available in the **Ülker Biskuvi Code of Conduct.**

The Ethics and Human Rights Committee evaluates the results of internal audits conducted within the framework of the Company's fight against bribery and corruption, high-risk issues, and matters related to ethical principles. Detailed information on the structure, areas of authority, and related responsibilities of the Ethics and Human Rights Committee can be found under Corporate Governance Structure in **Appendix 3** of our report.

In the event of a policy violation, we set out the review, investigation, and reporting processes in detail in the relevant provisions of the procedure and, where deemed necessary, impose disciplinary sanctions. We conduct the process within a framework of defined authorities and responsibilities, ensuring that it is duly documented and that confidentiality is maintained throughout. We provide details on the process for handling bribery and corruption violations under the Ethics Violation Reporting Mechanism.

Risk Assessment

At Ülker, we assess anti-corruption risks globally and annually, integrating them into our Enterprise Risk Management (ERM) framework. As part of this process, high-risk activities and business partners are identified, risk mitigation plans are developed, and the results are reported to the Board of Directors.
Our Company policies strictly prohibit bribery, fraud, and all forms of unethical conduct, as well as the direct or indirect offering, giving, authorizing, or accepting of anything of value for the purpose of obtaining an improper advantage. We apply this approach to all our business relationships with third parties. Before engaging with specified third parties, we conduct a risk-based anti-corruption due diligence process and require third parties identified as requiring additional controls based on the risk assessment to comply with our anti-corruption policies. Additional control mechanisms are implemented for operations assessed as high risk, particularly cash transactions and public tenders.
As part of our continuous monitoring efforts, we conduct an annual global anti-corruption risk assessment and develop risk mitigation plans.
Employees who interact frequently with third parties participate in annual Code of Conduct training. In 2025, all employees required to take this training successfully completed it. Appropriate disciplinary processes are initiated for employees who fail to complete mandatory ethics and compliance training.

In 2025, we provided 90 managers and 191 employees with anti-bribery and anti-corruption training. Through these training programs, we aim to ensure that our managers, particularly those involved in decision-making and procurement processes, accurately assess risks and effectively implement the provisions of the policy.

We also extend our anti-bribery and anti-corruption approach across our supply chain. In 2025, we provided training to 63 suppliers as part of this approach, amounting to a total of 504 person-hours. The training covers topics such as business integrity, prevention of improper advantage, accurate and transparent record-keeping, prevention of misrepresentation, protection of intellectual property, compliance with fair competition principles, whistleblower protection, and confidentiality of personal data.

Our policy also covers subcontractors, contractors, suppliers, and other third parties. Under the pladis Supplier Code of Conduct, we expect all parties we do business with to comply with the same ethical standards. We take ethics and corruption risks into account in new business relationships and supplier evaluation processes, and also assess our suppliers against compliance criteria as part of year-end performance evaluations. Based on the supplier evaluations conducted in 2025, no non-compliance related to bribery or corruption was identified among our suppliers.

HUMAN RIGHTS

We view respect for human rights not merely as an obligation to comply with regulations, but as an integral part of our corporate culture. We identify potential adverse human rights impacts through our whistleblowing mechanism, internal control systems, and management oversight. When such cases are identified, we initiate a review process, seek the views of the relevant parties, and implement the necessary corrective and preventive actions in line with the provisions of our policies. Where necessary, we initiate disciplinary processes and implement systemic improvements to prevent similar cases from recurring.

Our ethical way of doing business encompasses respect for human rights at every stage of our value chain. We developed our Human Rights Policy based on the OECD Guidelines for Multinational Enterprises and International Labour Organization (ILO) Conventions. We share our Human Rights Policy with our stakeholders in Türkiye, as well as in Arabic in Egypt and Saudi Arabia, and in Kazakh and Russian in Kazakhstan. We are committed to providing a fair, safe, and respectful working environment for our employees and business partners.

The full texts of the **Ülker Bisküvi Human Rights Policy and Global Human Rights Policy** are available on our website.

Our Human Rights Policy covers fundamental human rights issues such as human trafficking, forced labor, child labor, freedom of association, the right to collective bargaining, and the prevention of discrimination. This policy sets out the principles governing Ülker's human rights responsibilities across all its activities and new business relationships, and covers all of the company's operations and production facilities. The policy is also integrated into contracts with business partners, suppliers, and other third parties to ensure adherence to human rights principles across our entire value chain.

As part of our human rights due diligence approach, we conduct an annual human rights risk assessment across our value chain and update our risk mapping and the identification of potential impact areas through a systematic and periodic review process. We take a broad perspective in conducting this work, taking into account external developments such as changes in the operational context, geopolitical risks, and conflict situations that could exacerbate human rights violations. Findings and lessons learned from our due diligence activities in previous years are also incorporated into the process. We present the Human Rights Risk Assessment in **Appendix 9** of our report. This annual assessment enables us to keep our identification of potential human rights risks that may arise in our own operations and supply chain up to date, prioritize risks, and direct our preventive and mitigation actions toward the most critical areas. We conduct the assessment in line with international best practices and within the framework of the methodology presented below, drawing on the expertise of the boards, committees, and departments responsible for sustainability.

Assessment Steps Applied

- **Value Chain Mapping:** We comprehensively map our areas of impact and identify the relevant rights holders.
- **Identification of High-risk Regions:** We identify geographies associated with elevated risk and separately assess the risks specific to those regions.
- **Analysis of Potential Risks:** We systematically identify potential risks by country, sector, and type of activity, using international human rights indicators.
- **Risk Prioritization:** We prioritize risks by considering the severity of their potential impacts on people and our ability to take action.
- **Guiding Actions:** We integrate our findings into our programs and action plans for mitigating risks and monitoring impacts.

Salient Human Rights Risks in Ülker's Value Chain

	Own Operations	Tier-1 direct material suppliers	Tier-1 indirect service suppliers	Upstream agricultural raw material sourcing
Scope	Employees and subcontracted workers; 13 factories and Head Offices	Raw material, packaging, and contract manufacturing suppliers	Warehousing, logistics, facility management, and transportation	Cocoa, hazelnuts, wheat, vegetable oils, sugar, and milk
Key rights holders	Production workers, subcontracted workers, sales staff, and promotion teams	Production workers, subcontracted workers, and migrant workers	Drivers, transportation workers, warehouse workers, field staff, and migrant workers	Farmers, women, children, migrant workers, and local communities
Salient human rights risks[20]	Occupational health and safety (OHS), Wages and income, Working hours	Child labor, Freedom of association, Occupational health and safety (OHS), Wages and income, Working hours	Freedom of association, Occupational health and safety (OHS) Wages and income, Working hours	Access to water, Child labor, Impact of climate change, Wages and income, Land rights, Women's rights, Biodiversity degradation / Deforestation
Key Measures Taken[21]	Internal and external audits, Human Rights due diligence, ethics hotline reports, and the activities of the Ethics and Human Rights Committee	Supplier Code of Conduct and Ethics Hotline, Supplier ESG Program self-assessments and social compliance audits, social responsibility projects, and field audits on child labor		Regenerative and Sustainable agriculture projects, Internal and external audits, human rights due diligence, ethics hotline reports, and the activities of the Ethics and Human Rights Committee

You can find the detailed human rights risk assessment in **Appendix 9** of our report.



[20] We aim to address all human rights risks that may arise at any stage of the value chain; prioritizing certain risks for specific segments of the value chain does not mean that other risks are considered less important.
[21] Detailed activities and measures taken are described in the Human Rights Due Diligence section.

INFORMATION SECURITY AND CYBERSECURITY

In a rapidly digitalizing business environment, we regard the security and continuity of our information systems as an integral part of our corporate governance and risk management framework, with a view to protecting our corporate value and ensuring business continuity.

We implement our information security processes in full compliance with the ISO 27001 Information Security Management System standard. To address potential cyber risks and vulnerabilities, we continuously improve our systems and technologies, protect data integrity, proactively monitor threats by deploying advanced threat detection tools and adopting best practices, and regularly test our response mechanisms. We have established a comprehensive operational framework to monitor information security threats in real time and respond rapidly. Through advanced threat detection systems and continuous network monitoring tools, potential vulnerabilities and malicious activities are identified at an early stage, while our incident response team rapidly assesses and contains each threat.

We clearly define employee responsibilities and ensure compliance with our internal procedures through regular checks. The implementation of our cybersecurity strategy and the execution of technical operations are managed within the integrated structure of our parent company, pladis, and Yıldız Holding. The Yıldız Holding Information Security Directorate coordinates ISO 27001 compliance, penetration testing, threat monitoring, incident response, and continuous improvement processes.



You can access the **Ülker Bisküvi Information Security Policy** through our website.

Board Responsibility and Senior Management Oversight

We address cybersecurity governance at the Board of Directors level. Yahya Ülker, a member of our Board of Directors, also serves as Transformation and Technology Leader and Chief Technology Officer (CTO) at Yıldız Holding and pladis, and provides leadership in developing our cybersecurity strategies and integrating information security policies into corporate decision-making processes.

Information security risks, cybersecurity risks, and critical developments are regularly reported to the Board of Directors.

Through the model led by the Chief Information Officer (CIO) at pladis, we ensure global alignment and maintain a governance framework aligned with international best practices, particularly the principles of the NACD (National Association of Corporate Directors) and ISO 27001.

This structure is regularly monitored through the Information Security Committee, under the oversight of the CEO of Yıldız Tech and the CIO of Yıldız Holding. The Committee operates as a multidisciplinary body comprising representatives from management, technology, human resources, finance, legal, and internal audit functions. In this way, we position cybersecurity as a shared responsibility across the entire organization, rather than solely as the responsibility of the IT (Information Technology) function.

All our employees are required to complete mandatory information security and cybersecurity awareness training annually, starting from the recruitment process. These training programs cover topics such as phishing attacks, password security and safe internet use, data privacy, secure file sharing, recognition of cyber threats, and secure system use. Information security awareness training designed to reinforce a secure digital working culture helps reduce human-related risks and protect our information assets.

Internal Audit

To ensure the effectiveness of the Information Security Management System, internal audit activities are conducted regularly; audit findings and improvement recommendations are reported to senior management. Necessary measures are implemented and sanctions are rigorously enforced to prevent the recurrence of identified security violations. Internal audits of our information technology infrastructure and information security management systems are planned and carried out using a risk-based approach. These audits cover critical areas such as system reliability, access controls, data integrity, and regulatory compliance. Audit results are integrated into the enterprise risk management framework to ensure that the relevant business units take the necessary actions.

Vulnerability Analysis

We conduct comprehensive vulnerability assessments across computer systems, applications, and network infrastructure to systematically identify, classify, and prioritize security vulnerabilities. These assessments enable us to evaluate the threats facing Ülker from a holistic perspective, strengthen our risk awareness, and respond to threats rapidly and effectively. Vulnerability assessments are conducted as an integral part of our internal and external audit processes and are supported by penetration testing, simulated cyberattack scenarios, and similar technical procedures. The tests are conducted using a multi-layered approach covering network infrastructure, the application layer, and end-user systems. Identified vulnerabilities are classified according to their level of criticality and prioritized remediation processes are initiated; findings and actions taken are regularly reported to senior management and integrated into the enterprise risk management framework.

Incident Reporting and Escalation Process

We provide clear and accessible mechanisms for reporting suspicious situations. When employees identify a security vulnerability, suspicious activity, or potential violation, they can report it directly to their relevant managers or to the Information Security Committee. Each reported incident is documented and assessed according to its risk level; critical cases are escalated to the relevant committees and resolved accordingly.

We regard information security as part of our behavioral culture and address violations within our disciplinary processes under the Code of Conduct. We also take information security criteria into account in the selection of suppliers and contractors and monitor external service providers' compliance with the established standards. We apply information security requirements to all third parties, integrate these standards into contracts, and ensure compliance through regular audits. If any non-compliance is identified, we implement the necessary corrective actions. In this context, as of 2025, no significant data breaches occurred, and no cyber incidents requiring legal notification were reported.

Business Continuity Plans Related to Information Security

To protect critical information assets and ensure the uninterrupted continuity of our operations, we implement business continuity plans integrated with information security. These plans are structured around three key pillars: preventing potential threats in advance, limiting damage in the event of an incident, and restoring affected systems to operational status as quickly as possible. To prepare for potential cyber threats, system failures, data loss, access disruptions, and other information security-related risks, we develop comprehensive scenarios, conduct business impact analyses, and define emergency response steps. We test our plans at regular intervals, verify that they remain up to date through simulations and drills, and strengthen them through improvements where necessary. In this way, we ensure that any incident that could affect information security is managed rapidly and effectively without causing operational disruption, thereby safeguarding reliability and continuity for our company and stakeholders.



OUR PLANET

With a corporate culture focused on preventing waste, we are advancing toward our net-zero carbon emissions and circular economy goals across our value chain. Through our commitment to responsible production, we protect natural resources while contributing to a resilient food system.

- Climate Crisis
- Logistics
- Water Management
- Waste and Packaging Management
- Environmental Management
- Biodiversity



OUR PLANET

As pressure on natural systems continues to increase, climate change, ecosystem loss, and water stress are reshaping the risk landscape for the food industry. According to the World Economic Forum's (WEF) 2025 Global Risks Report,[22] key threats over the next decade include extreme weather events, biodiversity loss and ecosystem collapse, critical changes to Earth systems, and natural resource shortages. These risks are also having an impact in the short term, placing significant pressure on supply chains, raw material costs, and operational continuity.

By fostering a corporate culture that prevents waste, we aim to achieve net-zero carbon emissions across our value chain and to develop pioneering practices in the transition to a circular economy. Our approach to continuously improving energy, water, packaging, and waste management processes is grounded in the conservation and restoration of natural resources and biodiversity. We also support our goal by investing in operational efficiency and innovative practices, while fostering collaborations and partnerships across the value chain.



We increased our environmental investments and expenditures to **TRY 102.7 million.**

At the 12th **Sustainable Business Awards 2025**, organized by the Sustainability Academy, we secured first place in the manufacturing sector in the "**Carbon Management and Net Zero"** category.

By securing first place in the **"Sustainability Strategy"** category at the **ISO Green Transformation Awards**, we demonstrated the strength of our sustainability approach and our commitment to transformation.



SULTAN TEPE
ACCOUNTING MEMBER OF BOARD OF DIRECTORS AND CHAIR OF ICI SUSTAINABILITY PLATFORM, ISTANBUL CHAMBER OF INDUSTRY

Green transformation, which is redefining the production and consumption paradigm of our time, is making the transition to a greener, more circular, and more digital industrial structure a fundamental prerequisite for global competitiveness. The ISO Green Transformation Awards, launched by the Istanbul Chamber of Industry, not only recognize industrial facilities that place sustainability at the core of their operations, but also provide companies with opportunities to conduct self-assessments, strengthen internal communication, and increase their motivation for transformation. Ülker's commitment throughout this process demonstrates that, by placing environmental, social, and economic considerations at the heart of production, it is indeed possible for the Turkish food industry to create high added value in the global value chain and develop "competitive sustainability" capabilities.

[22] World Economic Forum Global Risks Report 2025

CLIMATE CRISIS



At a time of rising temperatures and increasingly frequent extreme weather events, climate change has become a critical vulnerability for food security. While prolonged droughts, floods, and water scarcity put pressure on agricultural productivity, volatility in raw material prices is felt across the value chain[23]. This landscape places investments in decarbonization, climate-resilient supply chains and sustainable agricultural practices among the sector's top priorities. At Ülker Bisküvi, we prioritize contributing to a resilient food system through sustainability-focused initiatives, adopting a responsible production approach to conserve natural resources, and supporting the restoration of ecosystems.

ÜLKER'S NET ZERO JOURNEY

In response to the climate crisis, we aim both to mitigate its impacts and adapt to changing conditions. In line with the goal of limiting global temperature rise to 1.5°C, we regard achieving net zero emissions by 2050 as one of our main strategic priorities. The first phase of our sustainability journey, which we have continued under our long-term goals in 2014, was completed in 2024. In line with this, we prepared our "Decarbonization Roadmap" for the second phase of our journey toward our net zero target, covering 2030 and 2050. With our interim target under the Science Based Targets initiative (SBTi)[24] and our commitment to net zero by 2050, we are one of the companies in Türkiye to have made this commitment and completed the validation process.

We aim to generate long-term value and drive sustainable growth by strengthening our production, procurement, and logistics infrastructure, and by investing in R&D, innovation, digitalization, sustainable agriculture, and the circular economy. At the same time, we aim to comply with the obligations of the European Green Deal and to respond to changes in global regulations with agile business models. Since 2016, we have been transparently disclosing our climate strategies and emissions data to the public through the Carbon Disclosure Project (CDP). In 2025, we improved our water security score to A- while maintaining our climate change score at B.

We have established annual reduction targets of 7.5% for Scope 1 and Scope 2 emissions and 3% for Scope 3 emissions.

[23] Global Risks Report 2025

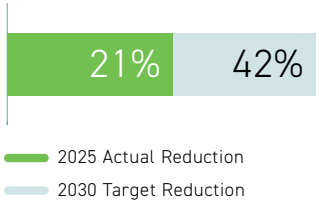
[24] The 2030 interim target date set in the SBTi process will be updated to 2034 to align with the targets of our parent company, pladis.

2030 Target*

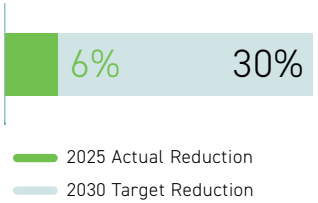
(ÜLKER CONSOLIDATED)

Reduce Scope 1 and 2 emissions by 42%, Scope 3 emissions by 30%, and FLAG emissions by 30.3% by 2030 compared to the 2023 base year (SBTi target)

Scope 1 & 2 Emissions



Scope 3 Emissions



2050 TARGET

Net Zero emissions across the value chain

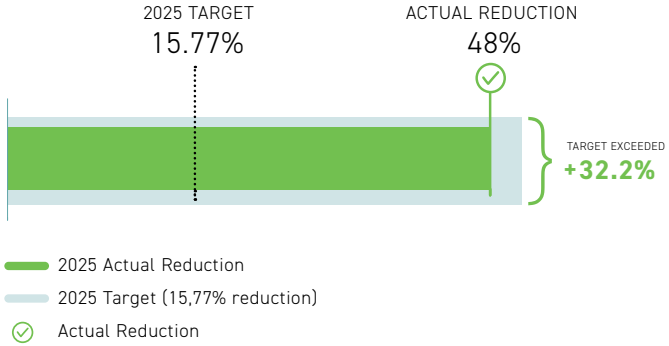
NET ZERO

2025 Target

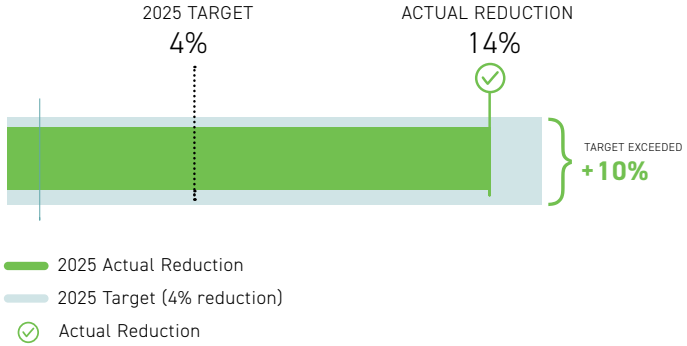
(ÜLKER TÜRKİYE FACILITIES)

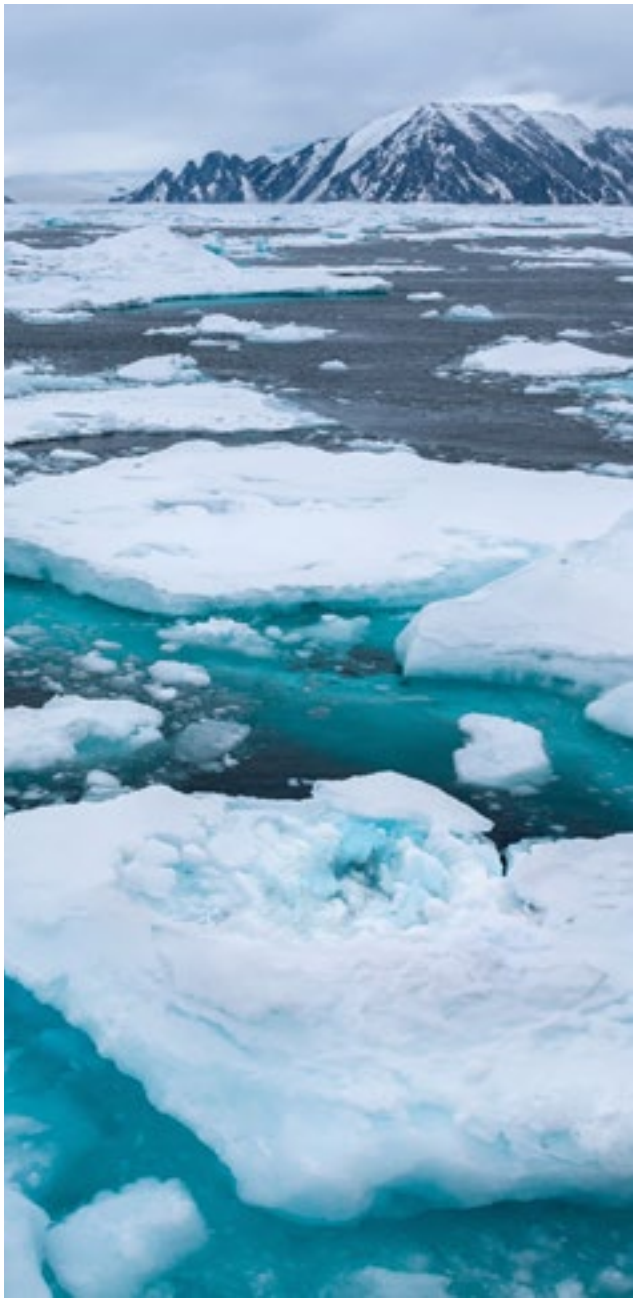
Reduce our Scope 1 and 2 emissions by 15.77% and Scope 3 emissions by 4% compared to the 2021 base year

Scope 1 & 2 Emissions



Scope 3 Emissions

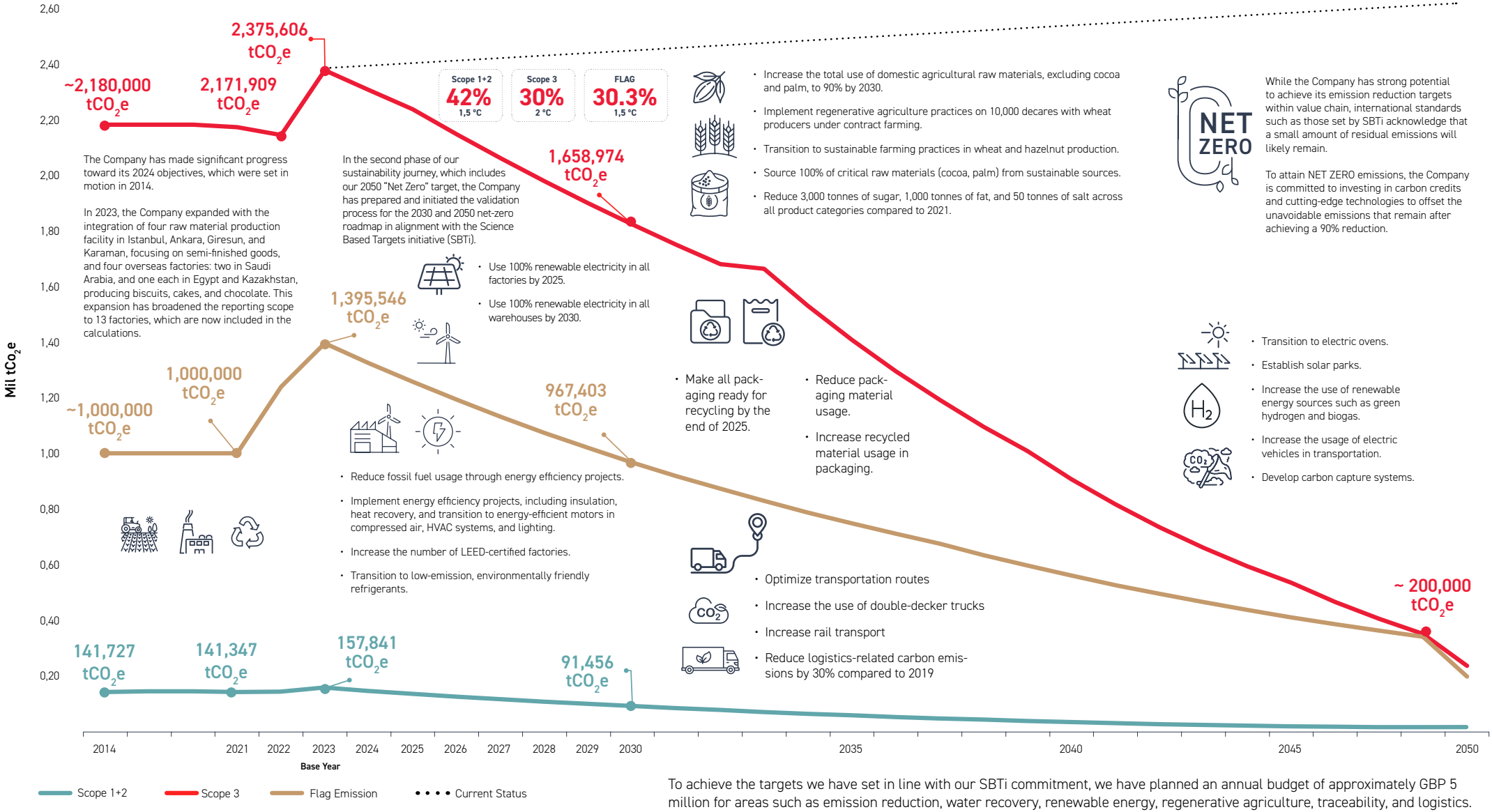




*We have established annual reduction targets of 7% for Scope 1 and Scope 2 emissions and 3% for Scope 3 emissions.

Decarbonization Roadmap

2014 – 2023 | **2023 – 2030** | **2030 – 2050**



The Company has made significant progress toward its 2024 objectives, which were set in motion in 2014.

In 2023, the Company expanded with the integration of four raw material production facility in Istanbul, Ankara, Giresun, and Karaman, focusing on semi-finished goods, and four overseas factories: two in Saudi Arabia, and one each in Egypt and Kazakhstan, producing biscuits, cakes, and chocolate. This expansion has broadened the reporting scope to 13 factories, which are now included in the calculations.

In the second phase of our sustainability journey, which includes our 2050 "Net Zero" target, the Company has prepared and initiated the validation process for the 2030 and 2050 net-zero roadmap in alignment with the Science Based Targets initiative (SBTi).

Scope 1+2	Scope 3	FLAG
42%	30%	30.3%
1,5 °C	2 °C	1,5 °C

- Use 100% renewable electricity in all factories by 2025.
- Use 100% renewable electricity in all warehouses by 2030.

- Reduce fossil fuel usage through energy efficiency projects.
- Implement energy efficiency projects, including insulation, heat recovery, and transition to energy-efficient motors in compressed air, HVAC systems, and lighting.
- Increase the number of LEED-certified factories.
- Transition to low-emission, environmentally friendly refrigerants.

- Increase the total use of domestic agricultural raw materials, excluding cocoa and palm, to 90% by 2030.
- Implement regenerative agriculture practices on 10,000 decares with wheat producers under contract farming.
- Transition to sustainable farming practices in wheat and hazelnut production.
- Source 100% of critical raw materials (cocoa, palm) from sustainable sources.
- Reduce 3,000 tonnes of sugar, 1,000 tonnes of fat, and 50 tonnes of salt across all product categories compared to 2021.

- Make all packaging ready for recycling by the end of 2025.
- Reduce packaging material usage.
- Increase recycled material usage in packaging.

- Optimize transportation routes
- Increase the use of double-decker trucks
- Increase rail transport
- Reduce logistics-related carbon emissions by 30% compared to 2019

NET ZERO

While the Company has strong potential to achieve its emission reduction targets within value chain, international standards such as those set by SBTi acknowledge that a small amount of residual emissions will likely remain.

To attain NET ZERO emissions, the Company is committed to investing in carbon credits and cutting-edge technologies to offset the unavoidable emissions that remain after achieving a 90% reduction.

- Transition to electric ovens.
- Establish solar parks.
- Increase the use of renewable energy sources such as green hydrogen and biogas.
- Increase the usage of electric vehicles in transportation.
- Develop carbon capture systems.

To achieve the targets we have set in line with our SBTi commitment, we have planned an annual budget of approximately GBP 5 million for areas such as emission reduction, water recovery, renewable energy, regenerative agriculture, traceability, and logistics.

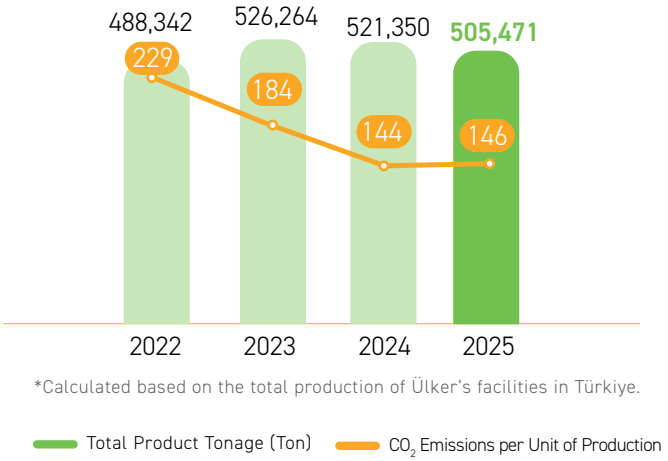
EMISSION MANAGEMENT

Since 2014, we have been calculating our greenhouse gas emissions in accordance with the Greenhouse Gas (GHG) Protocol. From 2021 onward, we have also been conducting detailed Scope 3 emissions calculations covering the value chain from raw material sourcing to the final consumption of products.

Thanks to the programs and projects implemented across our value chain, we continued our net zero journey in 2025, with our production facilities in Türkiye reaching a production volume of 505,471 tons. The total reduction in unit CO_2 emissions compared to 2014 has reached 50.7%. In addition, our Scope 1 and 2 emissions in Ülker's production facilities in Türkiye decreased by 1.8% compared to the previous year.

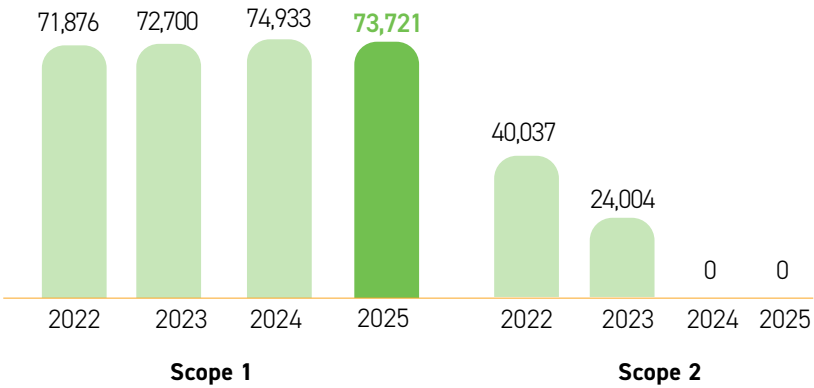


Ülker Türkiye Facilities GHG Emission Intensity per Unit of Production* (tCO_2e/ton)

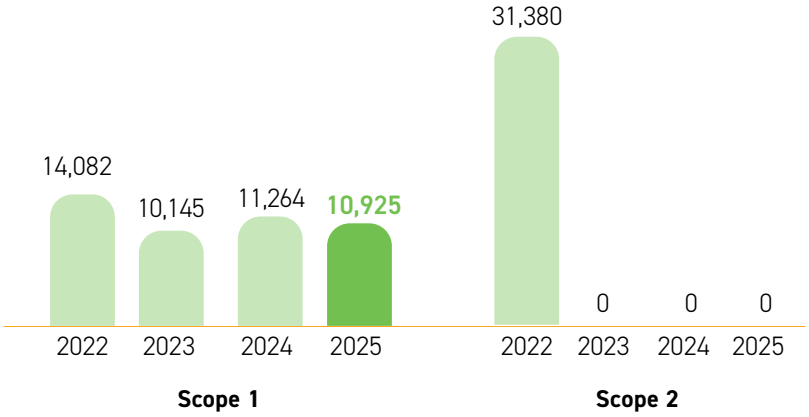


*Calculated based on the total production of Ülker's facilities in Türkiye.

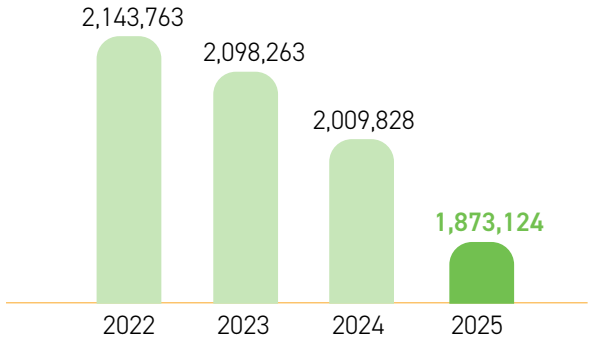
Ülker Türkiye Facilities Scope 1&2 GHG Emissions (tCO_2e)



Ülker Raw Material Facilities Scope 1&2 GHG Emissions (tCO_2e)

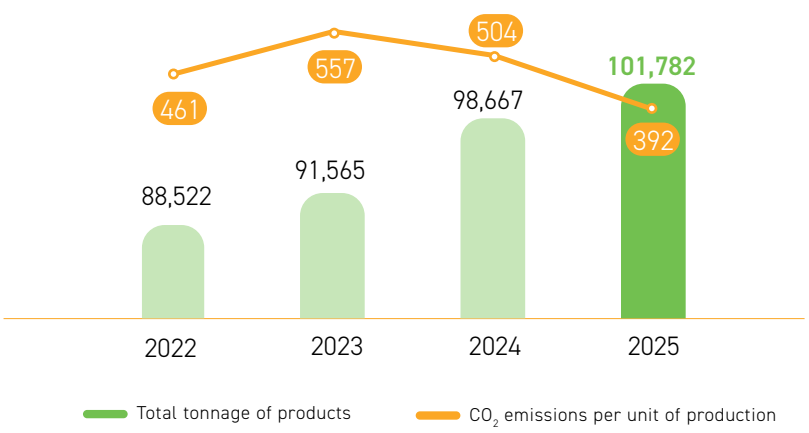


Ülker Türkiye Facilities (Raw Material and Finished Product) Scope 3 GHG Emissions (tCO_2e)

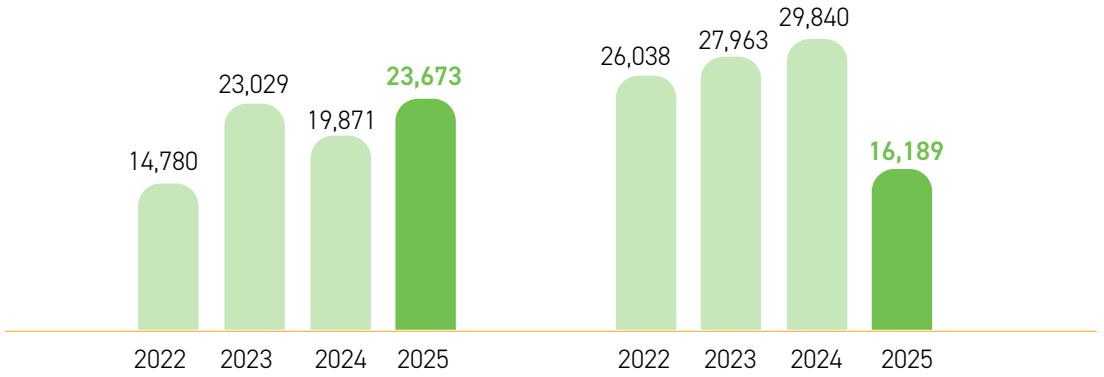


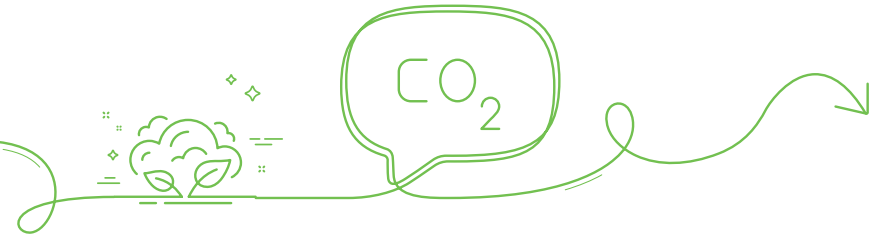
*Ülker Raw Material facilities were included in the scope following their merger with Ülker Bisküvi Sanayi A.Ş. in 2023.

Ülker Overseas Facilities GHG Emissions per Unit of Production (tCO_2e/ton)



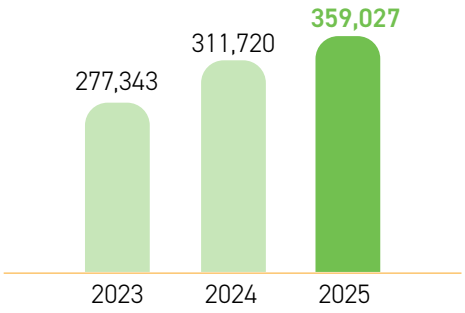
Ülker Overseas Facilities Scope 1&2 GHG Emissions (tCO_2e)

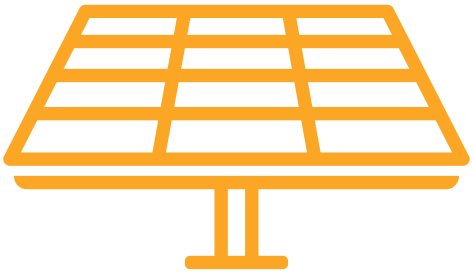




At Ülker's overseas facilities, we calculated Scope 1 and 2 emissions at 39,862 tCO_2e in 2025. By sourcing I-REC-certified renewable energy for 100% of electricity consumption at our Kazakhstan and Egypt facilities and 50% at our Jeddah facility, our production capacity increased by 3.2%, while our CO_2 emissions per ton of production decreased by 22.3%.

Ülker Overseas Facilities Scope 3 GHG Emissions (tCO_2e)





RENEWABLE ENERGY

We aim to source 100% of our electricity from renewable energy in all our facilities by 2025 and in all our warehouses by 2030. Accordingly, since 2024, we have sourced 100% of the electricity consumed in all our Ülker Türkiye and raw material facilities from renewable sources. We sourced 100% of the electricity consumed at our Kazakhstan and Egypt facilities, and 50% at our Jeddah facility, from I-REC-certified renewable sources. At our overseas facilities, 54% of electricity consumption is sourced from renewable energy, while across all Ülker facilities (Türkiye and overseas), the rate has reached 91%.

As we continue our investments in renewable energy plants and energy efficiency initiatives, we document this transformation through the I-REC renewable energy certificates we obtain. In this context, we avoided a total of 112,805 tCO_2e of greenhouse gas emissions, including 83,573 tCO_2e from Ülker's finished product facilities in Türkiye and overseas and 29,232 tCO_2e from raw material facilities through I-REC certification.



2025 Target

Using **100% renewable electricity** in our facilities in Türkiye by the end of 2025.

2030 Target

Using **100% renewable electricity** in all our warehouses by the end of 2030.



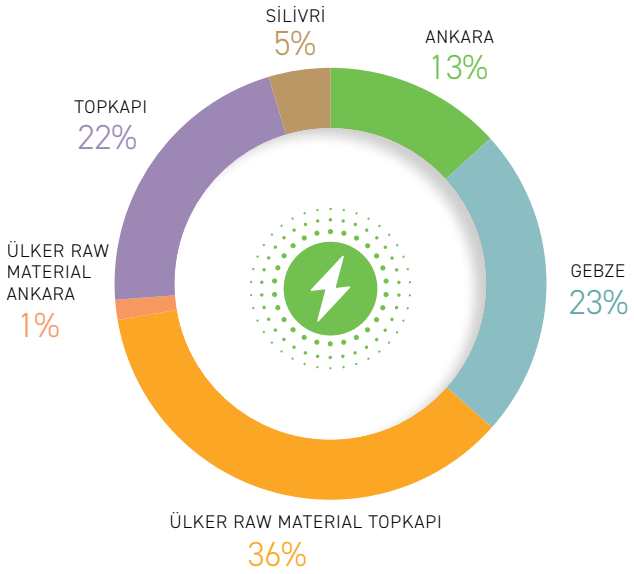
ENERGY EFFICIENCY

On our path to achieving our net zero target, we focus on energy efficiency and renewable energy projects that reduce our energy consumption. We regularly monitor monthly energy consumption across our facilities using the **"Energy Scorecards"** system. Thanks to the energy monitoring infrastructure established in previous years, we continue to monitor energy consumption and CO_2 emissions per unit of production in real time through a digital platform.

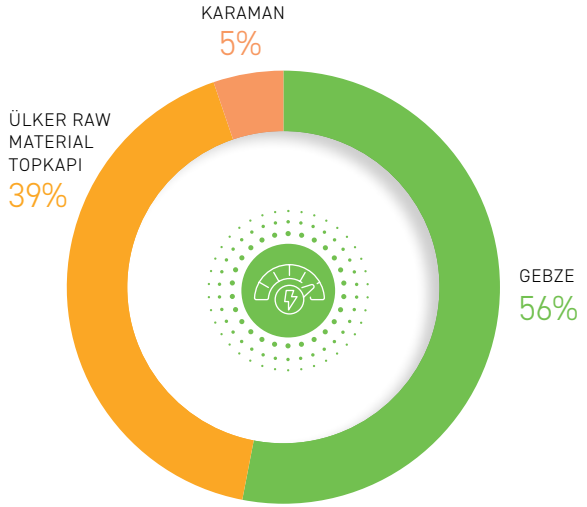
In addition to the projects carried out by our maintenance teams, we launched the **"Energy Movement"** initiative to engage all our employees in the process. Through the **"Mind Cube Suggestion System,"** we collect our employees' ideas on energy efficiency and reward the projects that are implemented. We carry out these activities in an integrated manner with the ISO 50001 Energy Management System implemented across all our Ülker Türkiye facilities (both finished product and raw material plants).

To enhance energy efficiency, we implemented various initiatives in our facilities in 2025, including efficient motor, compressor, and chiller conversions, energy-efficient ovens, the installation of ground-mounted and rooftop solar power plants, and a transition to refrigerants with low global warming potential (GWP). Through these projects, in which we invested approximately TRY 87.9 million, we achieved savings of 4,739 MWh and 683,436 Sm^3 of natural gas, financial savings of TRY 30.98 million, and prevented 3,382 tons of CO_2 emissions.

Energy Savings (MWh)



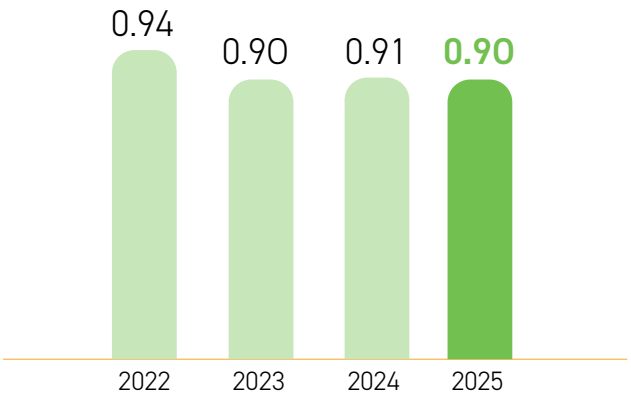
Energy Savings (Natural Gas – sm^3)



Since 2014, we have achieved a total **energy saving of 89,620 MWh** through implemented energy efficiency projects.



Energy Intensity* (MWh/ton of production)



*The energy intensity of Ülker Türkiye facilities per unit of production.

You can access the **Ülker Bisküvi Energy Policy** here.

Energy intensity across all Ülker facilities was **reduced by 1%** compared to the previous year.

FACILITY	PRODUCTION	ENERGY SAVINGS (KWH)	AVOIDED EMISSION (tCO_2e)	ACHIEVED SAVINGS (TRY/YEAR)
Silivri	Chocolate and chocolate-coated biscuits/cookies	219,000	62	932,940
Ankara	Biscuits/cookies, wafers, and crackers	628,060	177	2,209,000
Gebze	Biscuits/cookies, crackers, and cakes	4,962,585	1,397	10,206,755
Karaman	Flour, biscuits/cookies, cakes, crackers, and chocolate	380,050	107	551,474
Topkapı	Chocolate, cocoa powder, chocolate chips, chocolate flakes, and couverture	1,021,775	288	4,423,100
Raw material Ankara	Flour, biscuits/cookies, cakes, crackers, and chocolate	71,153	20	1,783,632
Raw material Giresun	Whole hazelnuts, chopped hazelnuts, and hazelnut paste	0	0	0
Raw material Topkapı	Cocoa powder, cocoa butter, cocoa mass, and chocolate paste	4,728,519	1,331	10,876,000
Total		**12,011,142**	**3,382**	**30,982,901**

Internal Carbon Pricing

Considering the contribution of agricultural, production, and logistics activities to carbon emissions in the food sector, we have made the internal carbon pricing mechanism an integral part of our business model to limit our environmental impacts and ensure compliance with the regulations introduced under the EU Green Deal. We first implemented this practice as a company in 2023 and now actively use the internal carbon price, set at €50 per ton, in our investment assessments. Through this mechanism, we align our capital expenditures with our decarbonization targets and prioritize low-carbon options by making the cost of carbon an integral part of our investment decisions. We systematically consider environmental and biodiversity risks in our investment assessment processes; this approach involves evaluating environmental impact criteria alongside financial parameters at the project approval stage.

At Ülker Bisküvi, we adopt a holistic evaluation approach that considers not only financial and environmental dimensions but also social impacts in the selection and prioritization of emission reduction projects. Prior to implementation, we analyze the emission reduction potential using the **"implicit carbon pricing"** approach together with social and environmental impacts. After the project, we calculate the carbon reduction cost per ton by dividing the total project cost by the emissions reduction achieved using the **"shadow carbon pricing"** method and compare this value with our internal carbon price set at €50/ton CO_2.



LOGISTICS

With a total of 13 production facilities, four of which are located abroad, Ülker Bisküvi ensures uninterrupted product delivery to more than 100 countries, combining its strong production capacity with a global logistics network. To minimize the environmental footprint of our operations across this extensive geography, we are fundamentally transforming our supply chain processes and make it a priority to build a more efficient, lower-carbon structure.

As part of our **Supply Chain Excellence Path** project, undertaken to optimize our logistics activities with a focus on sustainability, we adopt an efficiency-oriented approach in collaboration with all our stakeholders. In this context, the **Value Stream Mapping (VSM)** initiative reinforces the dual objectives of end-to-end supply chain visibility and operational excellence. This project at our Pelitli Warehouse, selected as the pilot site, represents a concrete step in the evolution of our excellence system beyond factory boundaries into a holistic structure encompassing the entire supply chain. Additionally, a comprehensive manual was prepared for the Logistics Business and Process Development Department to support standardization with a focus on sustainability and accelerate the onboarding of new teams, thereby transforming institutional knowledge into a living reference guide.

Following the 50 multi-deck trucks added to our fleet in 2024, we added 30 more multi-deck trucks to our logistics operations in 2025. Thanks to these high-capacity vehicles, we are taking concrete steps to reduce our CO_2 emissions by delivering more products with fewer kilometers traveled.

In 2025, we achieved TRY 100 million in savings in our logistics operations and reduced logistics costs by 4% compared to the previous year. As part of our Waste,





BÜLENT ÇOLAK
LOGISTICS DIRECTOR, ÜLKER BISKÜVI

At Ülker, the initiatives we have implemented to reduce carbon emissions from our logistics operations encompass a holistic transformation, ranging from vehicle capacity optimization to AI-supported route planning. As part of the WGO Project, the 80 double-deck trucks in our fleet increase the capacity of a standard truck from approximately 33 pallets to 66 pallets, enabling us to handle the same shipment with fewer vehicles and thereby significantly reduce total kilometers traveled, fuel consumption, and carbon emissions. The ALTAI route optimization project, which integrates SAP data with AI, maximizes vehicle load factor by reducing empty kilometers and improving pallet utilization, thereby simultaneously reducing operational costs and carbon emissions. By tracking the mileage data for each shipment in SAP and integrating it into our carbon emissions calculations through Business Objects reports, we manage our Scope 3 roadmap and our progress toward achieving our SBTi targets in a disciplined, data-driven manner.

Gains & Optimization (WGO) project, we integrated our multi-deck trucks with AI-supported systems. Thanks to this system, orders can now be matched with vehicles on the most suitable routes and with minimum distance. We also aim to strengthen end-to-end traceability by increasing the number of our multi-deck trucks, reduce empty kilometers by assigning loads to returning vehicles, and thus further reinforce our sustainable logistics structure. In addition, through AI-supported route optimization developed for our return product collection operations, we aim to collect more products with less distance traveled and reduce CO_2 emissions starting in 2025.

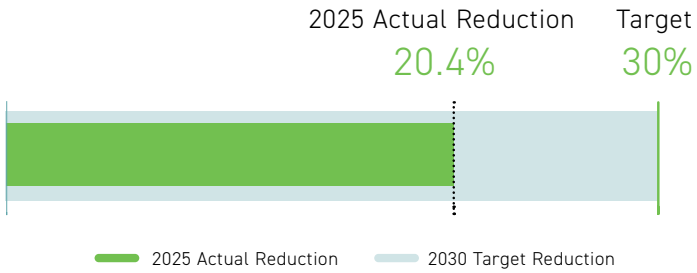
The transition to alternative modes of transportation is also one of the critical components of our low-carbon logistics strategy. We are among the pioneering companies in Türkiye's fast-moving consumer goods sector to use rail transportation. During this period, a total of 3,632 tons of CO_2 emissions were avoided, including 1,602 tons by optimizing EPAL/TURPAL[25] pallet logistics in collaboration with external service providers and 2,030 tons through vehicle consolidation initiatives.

Since 2014, we have reduced a total of 16,756 tons of carbon emissions from our logistics activities, achieving an overall 70% reduction in carbon output. This result reflects the combined impact of complementary strategies, including expanding our multi-deck truck fleet, increasing the use of rail transportation, AI-supported route optimization, and continuously improving vehicle load factors.

[25] EPAL (European Pallet Association) and TURPAL are standart pallet types used in logistic operations.



Reduce logistics-related carbon emissions by 30% by 2030 compared to the 2019 base year



Through the improvements we implemented in 2025, our logistics activities generated **19,498 tons less CO_2 emissions** compared to 2019, bringing us 68% of the way toward our target of reducing logistics-related carbon emissions by 30% by 2030.



WATER MANAGEMENT

The United Nations World Water Development Report 2026 highlights that approximately 70% of global freshwater withdrawals are attributable to agriculture, with the remainder coming from industry and domestic use. In low-income countries, agriculture accounts for nearly 90% of water use, while industrial use is considerably more prominent in high-income countries. Taken together, these trends reinforce the view that water is both a strategic resource and an area of operational risk for the food sector.[26]

According to the World Resources Institute (WRI) Water Risk Indicators mapping, Türkiye is among high-risk countries for water stress. We regularly monitor water-related risks on a quarterly basis in relation to our business continuity and strategic targets. These evaluations are addressed in the Sustainability Platform meetings held four times a year with the participation of senior management.

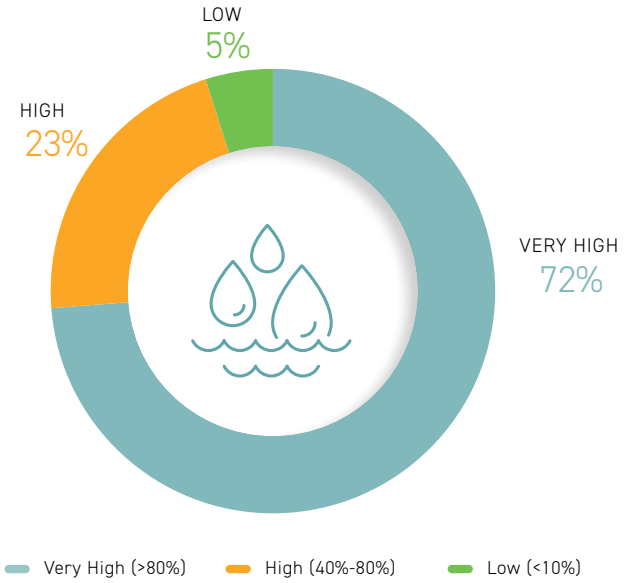
For our production facilities in Türkiye and abroad, we use the WRI Aqueduct Water Risk Atlas tool to conduct water risk analyses, update the results annually, and evaluate them together with environmental and climate-related physical risks. Through this approach, we develop practices that support the efficient use of water resources while aiming to enhance the resilience of our operations to climate change.

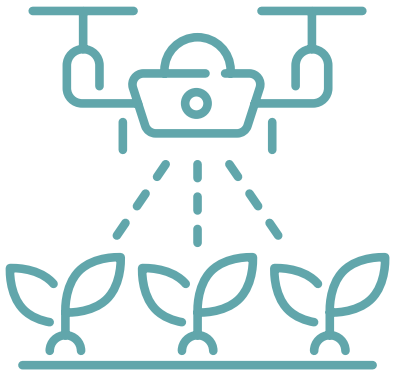
As of 2025, 72.6% of Ülker's operations, both in Türkiye and abroad, are located in areas with "very high" water stress levels (>80%), highlighting that we operate in regions of critical importance for water management. The share of facilities under high water stress is 22.6%, while only 4.8% are in areas with low stress levels.



[26] The United Nations World Water Development Report 2026

Total Water Stress Distribution





Ülker Türkiye Facilities	Production (ton)	Very High (>80%)		High (40%-80%)		Low (<10%)	
		Groundwater (m³)	Municipal Supply (m³)	Groundwater (m³)	Municipal Supply (m³)	Groundwater (m³)	Municipal Supply (m³)
Ülker Ankara	118,072	100,835	0	0	0	0	0
Ülker Gebze	134,242	0	0	4,808	232,106	0	0
Ülker Silivri	17,710	1,827	40,848	0	0	0	0
Ülker Karaman	110,431	168,270	35,749	0	0	0	0
Ülker Topkapı	125,015	32,574	90,547	0	0	0	0
Total	**505,471**	**303,506**	**167,144**	**4,808**	**232,106**	**0**	**0**
Total Water Withdrawal	**707,564**	**470,650**		**236,914**		**0**	

At Ülker's facilities in Türkiye, in regions with water stress levels above 80%, 64% of water comes from groundwater and 36% from municipal supply; in regions with water stress levels between 40–80%, 2% of water comes from groundwater and 98% from municipal supply.

Ülker Raw Material Facilities	Production (ton)	Very High (>80%)		High (40%-80%)		Low (<10%)	
		Groundwater (m³)	Municipal Supply (m³)	Groundwater (m³)	Municipal Supply (m³)	Groundwater (m³)	Municipal Supply (m³)
Ülker Raw Material Ankara	199,614	23,886	0	0	0	0	0
Ülker Raw Material Topkapı	127,668	0	132,387	0	0	0	0
Ülker Raw Material Karaman	51,690	3,582	0	0	0	0	0
Ülker Giresun	2,295	0	0	0	0	0	1,004
Total	**381,268**	**27,468**	**132,387**	**0**	**0**	**0**	**1,004**
Total Water Withdrawal	**160,858**	**159,854**		**0**		**1,004**	

At Ülker's raw material facilities in Türkiye, in regions with water stress levels above 80%, 17% of water comes from groundwater and 83% from municipal supply. In regions with water stress levels of 10% or below, 100% of the water comes from municipal supply.

Overseas Facilities	Production (ton)	Very High (>80%)		High (40%-80%)		Low (<10%)	
		Groundwater (m³)	Municipal Supply (m³)	Groundwater (m³)	Municipal Supply (m³)	Groundwater (m³)	Municipal Supply (m³)
Hi-Food	36,655	0	65,216	0	0	0	0
FMC	31,055	0	35,903	0	0	0	0
IBC	16,615	0	28,748	0	0	0	0
Hamle	17,457	0	0	0	0	0	49,697
Total	**101,782**	**0**	**129,867**	**0**	**0**	**0**	**49,697**
Total Water Withdrawal	**179,564**	**129,867**		**0**		**49,697**	

At Ülker's overseas facilities, in regions experiencing over 80% water stress, 100% of the water used comes from municipal supply; similarly, in regions with water stress levels of 10% or below, 100% of the water used comes from municipal supply.

Ülker Consolidated	Production (ton)	Very High (>80%)		High (40%-80%)		Low (<10%)	
		Groundwater (m³)	Municipal Supply (m³)	Groundwater (m³)	Municipal Supply (m³)	Groundwater (m³)	Municipal Supply (m³)
Total	**988,521**	**330,973**	**429,398**	**4,808**	**232,106**	**0**	**50,701**
Total Water Withdrawal	**1,047,986**	**760,371**		**236,914**		**50,701**	
Ratio to Total Water Withdrawal		**72.6%**		**22.6%**		**4.8%**	

On a consolidated basis across Ülker's facilities in Türkiye and abroad, in regions experiencing over 80% water stress, 44% of water comes from groundwater and 56% from municipal supply; in regions with water stress levels between 40–80%, 2% of water comes from groundwater and 98% from municipal supply; and in regions with water stress levels of 10% or less, 100% of the water used comes from municipal supply.



The analysis based on **WRI Aqueduct Water Risk Atlas** data reveals the water stress levels in the regions where Ülker carries out its production activities. The color distribution on the map shows that dark red areas represent very high water stress (over 80%), orange areas indicate high water stress (40–80%), and yellow areas reflect moderate water stress (10–40%). The green dots indicate the locations of Ülker's facilities.

The analysis results show that the facilities in Karaman, Ankara, and Istanbul (Topkapı and Silivri) in Türkiye, the facilities in Egypt, and the two facilities in Saudi Arabia are located in areas facing a very high risk of water stress.

- At our facilities operating in regions with very high water stress, we aim to achieve cumulative water and wastewater recovery of 50,000 m³ by 2030 compared to the 2014 baseline;
- By 2030, we aim to implement two wastewater recovery systems at our facilities operating in regions with very high water stress.

Actions toward these targets also include strengthening our water monitoring infrastructure and increasing rainwater harvesting capacity.
As part of the analyses conducted, we are developing projects in our operations that focus on water efficiency to reduce pressure on water resources and promote circular water use. We are carrying out efforts to reduce water consumption across our value chain starting from raw material use, implementing systematic practices for rainwater harvesting, wastewater reuse, and efficient utilization of water.

All wastewater generated in our facilities is treated through physical, chemical, and biological systems and discharged at levels well below legal limits. While rainwater harvesting is carried out at our Topkapı and Gebze facilities, we enhanced wastewater recovery by installing the Ultrafiltration (UF) and Reverse Osmosis (RO) systems already in place at our Topkapı facility at our Silivri facility as well. In this context, we reused a **total of 19,160 m³ of water in our facilities by recovering** 1,744 m³ of rainwater and 17,416 m³ of wastewater.

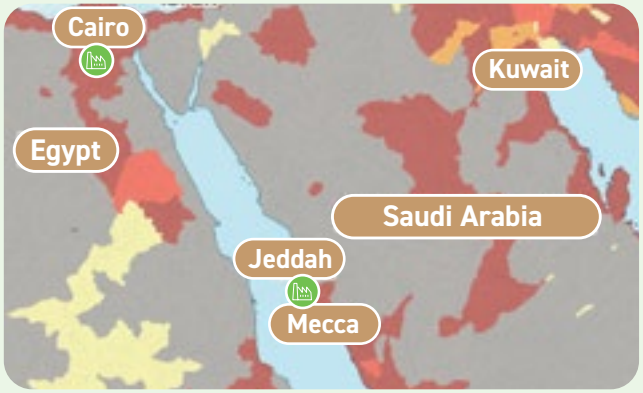
Ülker Türkiye Facilities Water Stress Distribution



Ülker Raw Material Facilities Water Stress Distribution



Ülker Overseas Facilities Water Stress Distribution

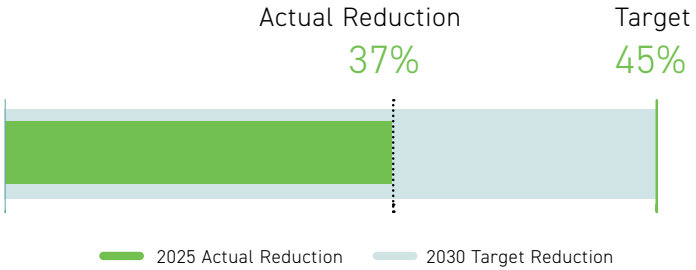




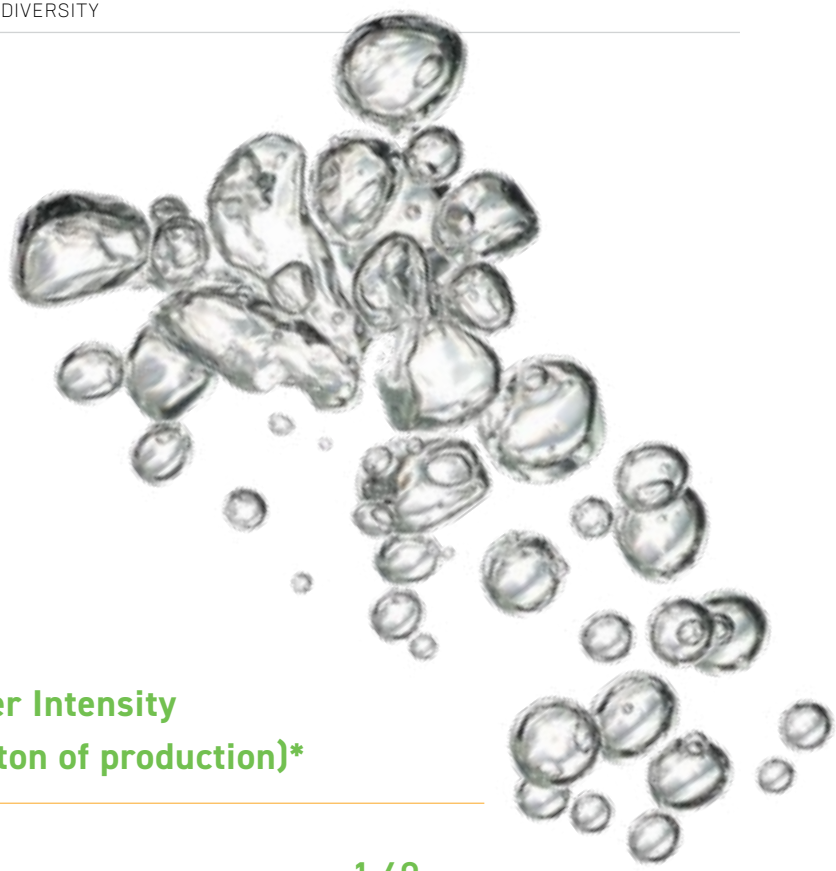
Dark and red tones indicate high water stress levels, where 80% or more of the annual available water supply is withdrawn.

2030 Target

By the end of 2025, we achieved a 37% reduction in water consumption per unit.



By 2030, we aim to reduce water consumption per unit by 45% compared to the 2014 base year.

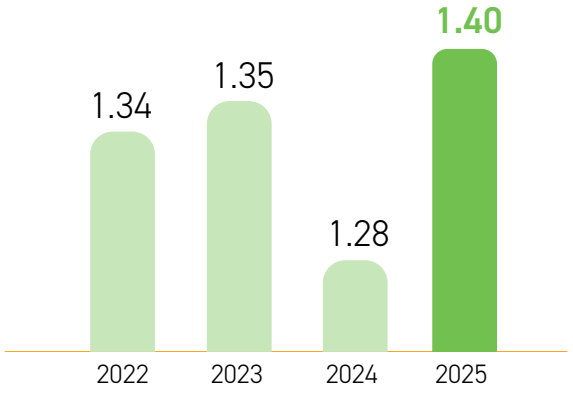


We systematically track water usage in all our facilities through scorecards updated on a monthly basis. Through the digital monitoring system implemented in our Ankara, Gebze, and Topkapı facilities, water usage points within the processes are monitored in real time. Thanks to this infrastructure, we ensure effective water management by promptly addressing potential leaks, losses, or unexpected increases in consumption.

As of 2025, we have reduced our water consumption per product by 37% compared to 2014. With the water efficiency and improvement projects we implemented in 2025, we achieved savings of approximately 26,759 m³ of water. This amount is equivalent to the daily average water needs of nearly 30,000 four-person households, while these initiatives generated financial savings of approximately TRY 1.5 million.

By adopting a life cycle approach to water management, we monitor and measure the environmental impacts of water in our production facilities and focus on minimizing them by improving efficiency. Accordingly, we calculate our water consumption in line with the ISO 14046 Water Footprint standard; by breaking down, on a facility basis, the amounts of water embedded in the product or lost through evaporation, we report and certify wastewater ratios in compliance with the requirements of the standard. All our calculations are verified by independent auditing bodies. During the period under review, no incidents of non-compliance with permits, standards, or regulations related to water quality or quantity were identified.

Water Intensity (m³/ton of production)*



*The water intensity data of Ülker's facilities in Türkiye.
Water Intensity = (Municipal Supply + Groundwater) / Total Production Tonnage

The water consumption and wastewater generation values of Ülker Türkiye, Ülker Raw Material, and Overseas facilities:

Ülker Türkiye Facilities	Wastewater Ratio %	Water Use (m^3)	Wastewater (m^3)	Wastewater Discharge
Ülker Ankara	73	100,835	73,119	Municipal Sewerage System
Ülker Gebze	70	236,914	165,840	Organized Industrial Zone
Ülker Silivri	63	49.276	31.186	Municipal Sewerage System
Ülker Karaman	75	204,019	153,014	Organized Industrial Zone
Ülker Topkapı	47	135.680	64.232	Municipal Sewerage System
Total	**67**	**726,724**	**487,392**	

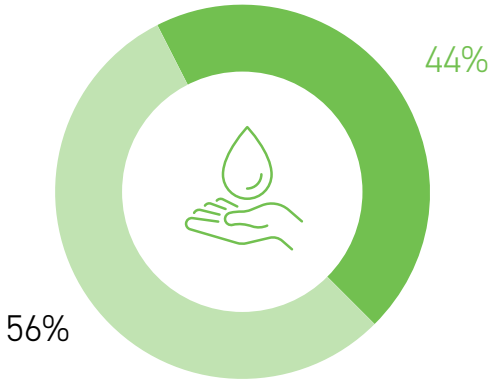
Ülker Türkiye Facilities	Wastewater Ratio %	Water Use (m^3)	Wastewater (m^3)	Wastewater Discharge
Ülker Raw Material Ankara	50	23,886	11,893	Municipal Sewerage System
Ülker Raw Material Topkapı	52	132,387	69,087	Municipal Sewerage System
Ülker Raw Material Karaman*	50	3,582	1,784	Organized Industrial Zone
Ülker Raw Material Giresun	90	1,004	904	Municipal Sewerage System
Total	**52**	**160,858**	**83,667**	

*Since the production of the Ülker Raw Material facility in Karaman is the same as that of the Ülker Raw Material facility in Ankara, the wastewater rate has been taken as that of the Ankara facility.

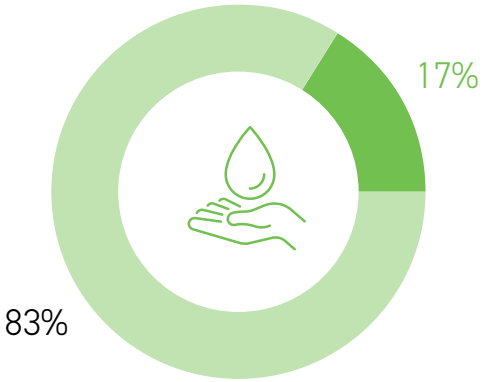
Ülker Overseas Facilities	Wastewater Ratio %[27]	Water Use (m^3)	Wastewater (m^3)	Wastewater Discharge
Hi-Food	67	65,216	43,553	Municipal Sewerage System
FMC	67	35,903	23,977	
IBC	67	28,748	19,199	
Hamle	67	49,697	33,189	
Total	**67**	**179,564**	**120,428**	

[27] Since wastewater volumes at overseas facilities cannot yet be measured, the average wastewater ratio of Ülker Türkiye facilities has been used.

Ülker Türkiye Facilities Water Sources



Ülker Raw Material Facilities Water Sources



Ülker Overseas Facilities Water Sources



Municipal Supply Groundwater

Internal Water Pricing

In response to increasing water stress risks, as part of the Internal Water Pricing initiative we launched in 2023, we analyze water risks in the watersheds where our facilities are located and conduct scenario analyses for 2030, 2040, and 2050. In this context, we assess water efficiency projects together with their environmental, social, and economic impacts and calculate the water reduction cost per cubic meter (m^3) based on the water savings achieved by the projects. In this way, we prioritize water efficiency investments and make more effective, data-driven decisions, particularly in regions with high water stress.

You can access the Ülker Bisküvi Water Policy here.



WASTE AND PACKAGING MANAGEMENT

The Circularity Gap Report 2025[28] reveals that value losses associated with linear material use[29] represent a significant economic opportunity on a global scale. According to the report, an estimated €25.4 trillion in economic value is lost worldwide each year due to inefficient resource use, products reaching the end of their useful life prematurely, and the underutilization of assets. This highlights the importance of circular economy practices that enable resources to be used more efficiently and their value to be retained for longer.

In line with this understanding, we shape our waste management approach around circular economy principles. While focusing on reducing waste generation at source and expanding reuse and recovery practices across our operations, we aim to reduce our environmental impacts and build a more resilient operational structure by improving resource efficiency.

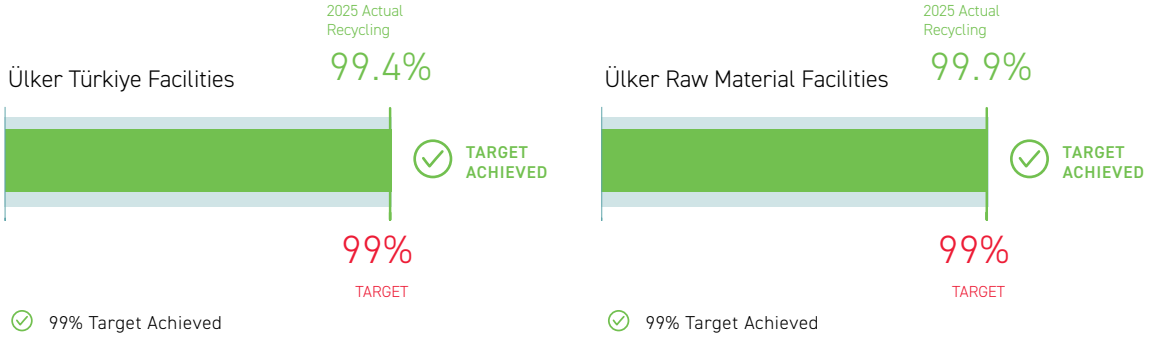
In line with our **"zero-waste corporate culture,"** we prioritize waste management at every stage of production and continue our efforts to enhance resource efficiency. Through industrial symbiosis practices, we aim to reduce the waste generated in our facilities and contribute to renewable energy by utilizing the resulting waste in energy production. At the same time, we aim to minimize our environmental impact by minimizing the waste sent to landfills.

We focus on minimizing raw material losses while maintaining quality standards in our production. In this context, we ensure high resource efficiency by converting 99.5% of the raw materials we use into finished products. Thanks to the waste stations and temporary storage areas in our facilities, we direct a significant portion of our waste to recovery and recycling processes.



2025 Target

Sending **zero waste** to landfills with a **99% recycling and recovery** ratio across all Türkiye factories by the end of 2025



[28] Circularity Gap Report 2025

[29] Linear material use: a non-circular production and consumption model in which resources are used on a "take-make-use-dispose" basis, and products and materials are not returned to the economy through reuse or recovery at the end of their useful life.

In 2023, all our facilities in Türkiye obtained the **"Zero Waste to Landfill"** certification in the food production sector, marking an industry first, and we maintained this achievement in 2025. With this certification, our system — in which waste is separated at the source and circular economy principles are effectively applied — has been internationally recognized. Thanks to our waste management practices, only 112 tons of the approximately 19,151 tons of waste generated at our Ülker Türkiye facilities were sent to landfills in 2025. Similarly, at our Ülker Raw Material facilities, only 2 tons of the approximately 2,119 tons of waste were sent to landfills.

Ülker Türkiye Facilities	Waste (tons)		Total (tons)	Recycling Rate (%)[30]
	Hazardous Waste	Non-Hazardous Waste		
Recovery (Energy)	14	2,374	2,388	99.4
Recovery/Recycling	38	16,613	16,652	
Landfills	6	106	112	
Disposal (Destruction)	0	0	0	

Ülker Raw Material Facilities	Waste (tons)		Total (tons)	Recycling Rate (%)
	Hazardous Waste	Non-Hazardous Waste		
Recovery (Energy)	7	374	381	99.9
Recovery/Recycling	26	1,710	1,735	
Landfills	0	2	2.3	
Disposal (Destruction)	0	0	0	

Ülker Overseas Facilities	Waste (tons)		Total (tons)	Recycling Rate (%)
	Hazardous Waste	Non-Hazardous Waste		
Recovery (Energy)	0	0	0	65
Recovery/Recycling	1	3,509	3,510	
Landfills	3	1,914	1,918	
Disposal (Destruction)	0	0	0	

	Non-Hazardous Waste (tons)	Accumulators and Batteries (kg)	Recycling/Recovery/Disposal
All Facilities Consolidated	8.19	0.04	Recycling

Ülker Türkiye Facilities	Recycling Rate (%)
Ankara	100.00
Gebze	99.99
Silivri	99.45
Karaman	96.50
Topkapı	99.91

Ülker Raw Material Facilities	Recycling Rate (%)
Ankara	100.00
Topkapı	99.99
Giresun	96.30
Karaman[31]	-

Other Countries	Recycling Rate (%)
FMC	54.7
IBC	64.26
Hamle	63.65
Hi-Food	69.80

Before directing our waste to recovery, we assess opportunities for industrial symbiosis. Food waste generated from production processes in all our facilities is recovered into the economy as animal feed additives, while organic waste from cafeterias is sent to biomethanization facilities, contributing to renewable energy generation through biogas production.

[30] Recycling Rate = (Recovery + Recycling) / (Total Waste)

[31] Since the waste management of the Ülker Raw Material Karaman facility is carried out by the Ülker Karaman facility, it is included in Ülker Karaman's recycling rate.

FOOD WASTE

The Organisation for Economic Co-operation and Development's (OECD) 2025 report, "Achieving Food Loss and Waste Reduction: From Targets to Action," highlights the critical importance of reducing food loss and waste in terms of climate, sustainability, and resource efficiency. The report highlights that achieving the food loss and waste reduction targets set under Sustainable Development Goal 12.3 could reduce greenhouse gas emissions associated with the agricultural sector by 4% and help lift 137 million people out of the risk of hunger by 2030[32].

At Ülker Bisküvi, we continue our efforts to reduce food waste with an approach centered on prevention. In collaboration with Migros, we contribute to the "10x20x30"[33] initiative, which aims to halve global food loss and waste by 2030.

In line with our target of reducing our net food losses to below 0.5% by 2030 compared to 2022, we set our interim target for 2025 at below 0.6%. We achieved this target at 0.57%, and our efforts toward our 2030 targets are ongoing.

In 2025, a total of 9,156 tons of food waste was generated, of which 7,856 tons came from production processes and 1,300 tons from sales returns. We utilized all food waste as animal feed, preventing waste and thereby returning it to the economy.

We aim to reduce our net food waste losses to below **0.5% by 2030 compared** to 2022.

0.57%
in 2025



[32] OECD Achieving Food Loss and Waste Reduction From Targets to Action
[33] A private sector-focused initiative developed by the World Resources Institute (WRI), aiming to reduce global food loss and waste by 50% by 2030.

PACKAGING MANAGEMENT

Packaging is undergoing a global transformation, with design being rethought and recyclability becoming standard criteria. Under the EU Plastics Strategy and Circular Economy Action Plan, reducing single-use plastics and preventing microplastic pollution are among the priority policy objectives; meanwhile, the EU Packaging and Packaging Waste Regulation (PPWR), which took effect in 2025, provides manufacturers with a clearer roadmap by making criteria such as recyclability and recycled content mandatory for all types of packaging by 2030.

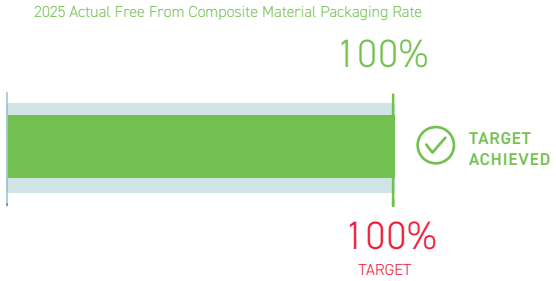
At Ülker Bisküvi, 26% of our packaging consists of plastic materials. Taking into account the potential environmental and legal impacts of this ratio, we closely monitor regulatory developments in Europe and keep our risk assessments up to date. We regard our practices to reduce packaging waste at the source as one of the priority areas in our production processes.



Ülker Facilities - Packaging Usage (tons)					
	Plastic	**Paper**	**Glass**	**Metal**	**Non-recyclable**
Ülker Türkiye Facilities	16,923	48,335	245	467	-
Ülker Raw Material Facilities	136	521	-	-	-
Ülker Overseas Facilities	2,895	20,615	-	-	-
Total	19,953	69,471	245	467	-



Our goal is to have all plastic packaging **designed to be recyclable** by the end of 2025.



In line with our annual reduction targets of 200 tons of plastic and 300 tons of paper, we **reduced plastic packaging use by 96 tons and paper use by 25.2 tons in 2025.**

In 2025, the transition from composite packaging structures to recyclable mono-structure packaging was completed across multiple products.[34]

- The Çokokrem Tube project marked a first for Ülker **eliminating the use of 121 tons of composite material annually.**
- In the Çokokrem Blister range, in addition to a **53-ton reduction in composite material use**, production was consolidated onto a single line through an investment in the production line, improving operational efficiency.
- The transition to mono-structure packaging for Flipz Doypack, Taç Kraker, and Rulokat also **eliminated the use of approximately 180 tons of composite packaging** in total.
- The Flipz project also generated **savings of TRY 690,000**.



To reduce the environmental impacts of packaging in the products we offer to consumers, we are implementing material transformations that enhance recyclability. By expanding the use of a single type of raw material in our packaging, we reduce plastic use while also enhancing compatibility with recycling processes. In this context, we are reducing the environmental impact of our packaging by replacing 423 tons of non-recyclable multilayer packaging material with a recyclable single-material structure.

Ülker Türkiye Facilities	Packaging Waste (tons)						
	Plastic (150102)	Paper (150101-200101)	Glass (150107)	Metal (150104)	Composite (150105)	Wood (150103)	Total
Ankara	501	620	-	18	91	-	1,231
Gebze	337	1,010	0.24	53	85	774	2,259
Silivri	66	361	-	10	30	130	598
Karaman	765	855	5	19	-	-	1,645
Topkapı	355	1,239	1	8	35	43	1,681
Total	**2,024**	**4,085**	**7**	**110**	**242**	**947**	**7,414**

Ülker Raw Material Facilities	Packaging Waste (tons)						
	Plastic (150102)	Paper (150101-200101)	Glass (150107)	Metal (150104)	Composite (150105)	Wood (150103)	Total
Topkapı	6	717	1	5	126	424	1,280
Ankara	1	28	-	-	-	23	52
Giresun	2	-	-	-	-	-	2
Karaman*	*The packaging waste generated from the Ülker Karaman Raw Material facility has been managed within the Ülker Karaman facility.						-
Total	**9**	**745**	**1**	**5**	**126**	**448**	**1,334**

[34] Composite packaging that is not suitable for recycling consists of different materials bonded together, and since the layers cannot be separated, they cannot be recycled.



As part of the Business Plastics Initiative (IPG), in which we participate through Yıldız Holding, we continue our efforts to achieve the target of reducing 1,000 tons of plastic by 2030. We develop innovative solutions in packaging design that reduce environmental impact and optimize material use. In this context, while reducing paper use in certain products, we continue our efforts to replace PVC materials, which are difficult to recycle and have a high environmental impact, with PET.

Overseas Facilities	Packaging Waste (tons)					
	Plastic (150102)	Paper (150101-200101)	Glass (150107)	Metal (150104)	Composite (150105)	Wood (150103)
Saudi Arabia Factory (pladis Arabia International)	108	259	-	-	-	92
Saudi Arabia Factory (pladis Arabia Food)	77	287	-	16	-	51
Kazakhstan Factory	74	164	-	58	-	77
Egypt Factory	217	510	-	26	-	191
Total	**476**	**1,220**	**-**	**100**	**-**	**411**

All our plastic packaging is **free from composite structures.**

Ülker Consolidated*	Packaging Waste (tons)						
	Plastic (150102)	Paper-Mixed (150101-200101-150106)	Glass (150107)	Metal (150104)	Composite (150105)	Wood (150103)	Total
	2,509	**6,051**	**8**	**215**	**368**	**1,805**	**10,956**

*Refers to the total of Ülker Türkiye, Raw Material, and Overseas facilities.

ENVIRONMENTAL MANAGEMENT

We manage the environmental impacts of our activities through our Environmental Management System, structured in line with our Environmental Policy.

You can access the **Ülker Bisküvi Environmental Policy** and the **Global Environmental Policy** here.

We regularly have the effectiveness of the systems implemented at our Ülker Türkiye, Raw Material, and Overseas facilities audited by independent certification bodies with international accreditation, while monitoring the continuity and compliance of practices through periodic internal audits.

As part of the annual Environmental and Energy Audits conducted by our Corporate Environmental and Energy team, our Ülker Türkiye and Ülker Raw Material facilities are evaluated and scored in line with the applicable procedures; the audit results and action plans are regularly reported to senior management. In 2025, none of our facilities covered by the report experienced any environmental accidents or incurred environmental penalties related to soil pollution, air pollution, or impacts on water resources.

In line with our sustainability targets, we carried out Life Cycle Assessments (LCA) in accordance with the ISO 14025 standard to prepare Environmental Product Declarations (EPD) for our 6 products with the highest production volumes. Through these assessments, we measure our products' carbon footprint, energy consumption, and resource use using a scientific and transparent methodology. The resulting data help shape our strategies to improve environmental performance, while also enabling us to share our sustainability approach with stakeholders through concrete figures.



All Ülker facilities qualified for the Green Check Certificate at Gold level.

In 2025, our Kazakhstan facility was awarded the ISO 14001 Environmental Management System certification.

At Ülker Bisküvi, we structure our environmental financial resources in 2025 under two main categories:

a. Legally mandated environmental expenditures for regulatory compliance

b. Expenditures that go beyond legal obligations and reflect our proactive approach to environmental responsibility

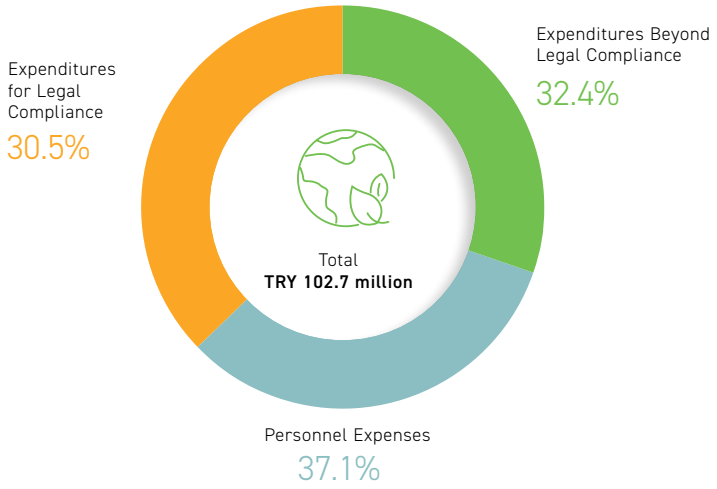
In 2025, we increased our total environmental financial resources to TRY 198.1 million. Of this total, TRY 102.7 million is attributable to environmental investments and expenditures; TRY 95.4 million to energy-water investments and expenditures.

Environmental Expenditures (million TRY)

	2023	2024	2025
Environmental Expenditures (million TRY)	27.7	69.0	102.7

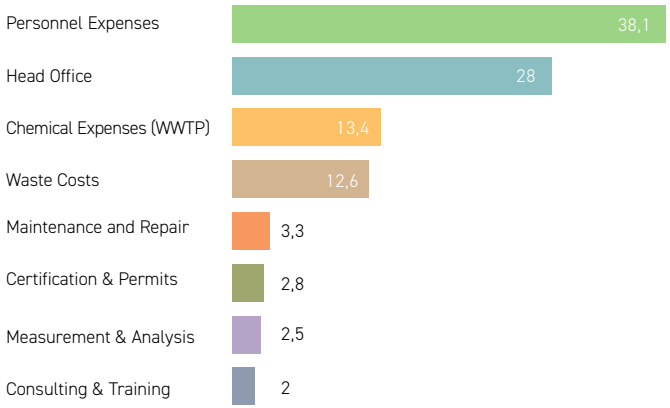
Of the total TRY 102.7 million in environmental expenditures, including personnel expenses, 30.5% (TRY 31.3 million) relates to mandatory expenditures for regulatory compliance, 32.4% (TRY 33.3 million) to voluntary expenditures beyond legal obligations, and the remainder to personnel expenses.

Distribution of Environmental Expenditures (2025)

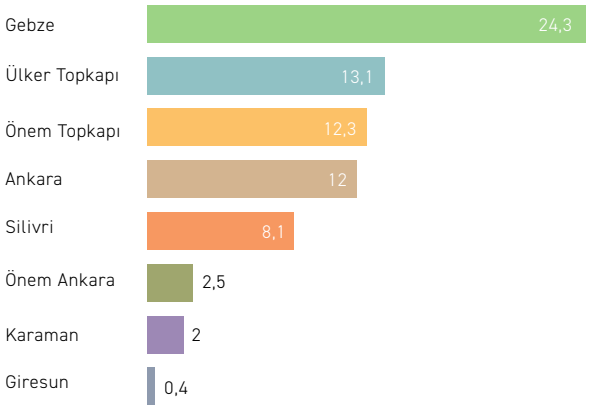


In 2025, the operational portion of our total TRY 102.7 million in environmental expenditures, excluding personnel expenses, amounted to TRY 64.6 million, covering both facility-level operational activities and central activities carried out by Ülker Bisküvi. Of this amount, 48% consists of mandatory expenditures for regulatory compliance, including waste, wastewater, measurement/analysis, and permitting/certification expenses, while 52% consists of expenditures beyond legal obligations, including voluntary certification (I-REC, ISO 14046, ISO 14025), maintenance/repair, consulting, training, and sustainability capacity-building activities. Facility-level environmental investments and expenditures are reported to senior management by project teams and are also evaluated in terms of their ESG outcomes.

Distribution by Category (MILLION TRY)



Distribution by Facility (MILLION TRY)



ENVIRONMENTAL INVESTMENTS IN GROWHT AREAS

In 2025, we increased our energy and water efficiency investments in our growth areas to TRY 95.4 million. We classify these investments into three main categories based on their sustainability impacts:

1. Mitigation Investments: These include projects that directly and significantly reduce resource consumption or greenhouse gas emissions and make a net positive contribution to sustainability. Examples of our projects include steam condensate recovery, energy-efficient motor conversions, compressor optimization, oven capacity expansion, pipe insulation, LED lighting conversions, wastewater recovery systems, and rainwater harvesting systems.

2. Transition Investments: These investments support the shift to more sustainable alternatives in resource- and/or carbon-intensive processes. The 31.5 kWp solar panel installation commissioned at our Gebze facility, the steam generator at our Topkapı Raw Material facility, and the infrared burner conversion in the ovens at our Karaman facility are among our key investments in this category.

3. Enabling Investments: These are infrastructure, monitoring, and digitalization investments that do not directly reduce resource consumption or emissions but enable other mitigation and transition investments. Blue IT water monitoring system and the digital monitoring infrastructure for wells and cisterns are examples in this category.

In 2025, our environmental investments and expenditures generated total **financial savings of TRY 50.1 million.**



Energy Efficiency Projects

As part of the energy efficiency projects implemented across all our facilities, we invested TRY 87.9 million. These investments generated financial savings of TRY 31 million, as well as energy savings of 4,739 MWh and 683,000 Sm^3 of natural gas. The energy saved is equivalent to approximately 3,382 tons of CO_2e.

Water Efficiency Projects

As part of our water efficiency investments, we invested TRY 7.4 million, achieving financial savings of TRY 1.5 million and water savings of 26,759 m^3. The wastewater recovery system installed at our Silivri facility provides annual water savings of 5,420 m^3.

Environmental Trainings

Across all our facilities, we enhance employee competencies through environmental and sustainability training covering topics such as energy, water, and resource efficiency, waste reduction, and waste management, aiming to embed a culture of sustainability across our operations. In this context, in 2025, we provided 810 hours of environmental and sustainability training to a total of 837 contractor employees, and 2,478 hours of environmental and sustainability training to a total of 2,000 of our employees.



CERTIFICATION PROCESSES

To achieve high standards in environment and energy and reduce our environmental impacts, we are expanding the implementation of international management systems and certification processes across our facilities. Through the certification programs we implement in this context, we continuously improve our environmental performance while aiming to increase resource efficiency and integrate our sustainable production approach into all our operations.



ÜLKER TÜRKİYE FACILITIES

FACILITIES*	ISO DOCUMENTS						SUSTAINABILITY		WASTE MANAGEMENT		GREEN BUILDING (ENERGY EFFICIENCY)	
	ISO 9001 – Quality Management System	ISO 14001 – Environmental Management System	ISO 45001 – Occupational Health and Safety Management System	ISO 50001 – Energy Management System	ISO 14046 – Water Footprint	ISO 14025 – Environmental Product Declaration (EPD)	ISCC – International Sustainability and Carbon Certification	Green Check – Green Check Certificate	Zero Waste Certificate (Ministry)	Zero Waste to Landfill	Breeam In Use (Green Building)	Leed (Green Building)
Ülker Ankara	✓	✓	✓	✓	✓	✓	-	✓	✓	✓	Ongoing	
Ülker Giresun	✓	✓	✓	✓	✓	✓	-	✓	✓	✓	✓	Ongoing
Ülker Topkapı	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	Ongoing	
Ülker Silivri	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	-	
Ülker Karaman[35]	✓	✓	✓	✓	✓	✓	-	✓	✓	✓	-	

*Ülker Bisküvi's Raw Material facilities in Ankara and Giresun have been excluded from the scope of ISCC and EPD, as they produce semi-finished products.

[35] The Ülker Raw Material Karaman facility is included.

ÜLKER RAW MATERIAL FACILITIES

FACILITIES*	ISO DOCUMENTS						SUSTAINABILITY		WASTE MANAGEMENT		GREEN BUILDING (ENERGY EFFICIENCY)	
	ISO 9001 – Quality Management System	ISO 14001 – Environmental Management System	ISO 45001 – Occupational Health and Safety Management System	ISO 50001 – Energy Management System	ISO 14046 – Water Footprint	ISO 14025 – Environmental Product Declaration (EPD)	ISCC – International Sustainability and Carbon Certification	Green Check – Green Check Certificate	Zero Waste Certificate (Ministry)	Zero Waste to Landfill	Breeam In Use (Green Building)	Leed (Green Building)
Ülker Ankara	✓	✓	✓	✓	✓	Out of Scope	Out of Scope	✓	✓	✓	-	
Ülker Giresun	✓	✓	✓	✓	✓	Out of Scope	Out of Scope	✓	✓	✓	-	
Ülker Topkapı	✓	✓	✓	✓	✓	✓	-	✓	✓	✓	-	

ÜLKER OVERSEAS FACILITIES

Facility Name	ISO 9001 Quality Management System	ISO 14001 Environmental Management System	ISO 45001 Occupational Health and Safety Management System	ISO 50001 Energy Management System
Saudi Arabia Factory (pladis Arabia International)	✗	✓	✓	✗
Saudi Arabia Factory (pladis Arabia Food)	✗	✓	✓	✗
Kazakhstan Factory	✓	✓	✓	✗
Egypt Factory	✗	✓	✓	✗

AIR EMISSIONS

At Ülker Türkiye Finished Product and Raw Material facilities, we regularly monitor not only greenhouse gas emissions but also other air pollutant levels and aim to reduce them. These emissions, which remain below the established legal limits, are periodically measured and verified by accredited laboratories.

Ülker Türkiye Facilities

Facility Name	Source (Number of Points)	Parameter (kg/hour)						
		CO	NO_2	NO	SO_2	Dust	Total Organic Carbon (TOC)	Volatile Organic Compounds (VOC)
Ülker Ankara	104	3.2	0.2	2.5	0.8	0.2	0	0
Ülker Gebze	116	5.9	5.9	3.8	0.1	0.2	0	0
Ülker Topkapı	19	0.4	5.1	3.2	0.04	0.2	0	0
Ülker Silivri	13	0.2	0.01	0.1	0.07	0.07	0	0
Ülker Karaman	145	6.0	4.6	2.9	0.06	0.2	0	0

Ülker Raw Material Facilities*

Facility Name	Source (Number of Points)	Parameter (kg/hour)						
		CO	NO_2	NO	SO_2	Dust	Total Organic Carbon (TOC)	Volatile Organic Compounds (VOC)
Ülker Ankara	Out of Scope	0	0	0	0	0	0	0
Ülker Giresun	8	0.1	0.3	0.2	0.03	0.001	0	0
Ülker Topkapı	16	0.4	1.8	1.1	0.04	0.2	0.004	0
Ülker Karaman	Out of Scope	0	0	0	0	0	0	0

*Prohibited refrigerants, such as CFCs and R22, are not used in any of our facilities.

Through oven modernization and burner improvement projects initiated in 2024, we reduced LPG consumption in 2025, contributing to lower NOx and SOx emissions. By transitioning from LPG to natural gas, we achieved a 99% reduction in SOx emissions and an approximately 22% reduction in NOx emissions. In the following year, we aim to reduce air emissions by 10% by replacing diesel- and gasoline-powered forklifts with electric forklifts.

We aim to maintain zero VOC emissions annually and avoid applications that may lead to VOC generation in new process, chemical, or equipment investments.

BIODIVERSITY

Biodiversity loss, together with climate change, stands out as one of the most critical environmental risks globally. Recent research shows that monitored vertebrate species populations have declined significantly over the past 50 years, with freshwater ecosystems experiencing the greatest losses. Habitat loss, overexploitation of natural resources, invasive species, and climate change are among the primary drivers of these declines.[36]



You can access our **Biodiversity Policy** and **Global No Deforestation Policy** here.

[36] WWF Living Planet Report 2024

Our Biodiversity Commitment

For the food sector, which is highly dependent on natural resources and ecosystem services, this situation underscores the growing importance of nature-based solutions and nature-aligned sourcing models. In this context, we focus on expanding practices that support biodiversity conservation across our operations and value chain and promoting the sustainable use of natural resources.

Our commitments to biodiversity conservation are structured around the following four principles:

- We require our value chain partners to avoid conducting operational activities near areas of globally or nationally significant biodiversity.
- We have adopted as our long-term goal the establishment of a system that achieves no net loss of biodiversity overall by preventing and minimizing biodiversity impacts arising from our agricultural supply chain, restoring biodiversity through on-site restoration practices, and offsetting any residual impacts at the appropriate geographic scale (farm, watershed, or landscape level). Our regenerative agriculture projects, our efforts to prevent deforestation carried out in collaboration with the Earthworm Foundation, and our partnership with the Hazelnut Research Institute represent concrete steps toward this goal. To achieve this goal, we follow the mitigation hierarchy: first, we avoid negative impacts at source, minimize unavoidable impacts, remediate them through on-site restoration practices, and offset any remaining significant impacts at an appropriate geographic scale.
- We regularly conduct biodiversity risk assessments.
- We work in collaboration with our stakeholders on biodiversity. We develop biodiversity conservation projects in collaboration with national and international non-governmental organizations, while also supporting our farmers and soil health throughout this process. We also communicate our biodiversity conservation expectations to suppliers through the pladis Supplier Code of Conduct, which requires compliance with forest management, biodiversity conservation, and no-deforestation requirements.



2030 Target

Ensuring **100% traceable and deforestation-free sourcing of palm and cocoa raw materials from farm to factory** by 2030.



BÜŞRA TUĞÇE ÖZDEMİR
SUSTAINABILITY MANAGER, ÜLKER BİSKÜVİ

At Ülker, we are scaling up our biodiversity efforts through on-the-ground agricultural projects following a biodiversity risk analysis across all our production facilities and key raw materials. We monitor our impacts through water and fertilizer use, the adoption of good agricultural practices, and physical, chemical, and biological analyses of soil health. We assess these data together with field observations and climate monitoring to identify priority crops and regions. By expanding our training and field activities each year, we reach more farmers engaged in hazelnut, cocoa, and wheat farming and promote the wider adoption of sustainable agricultural practices. Through this approach, we not only contribute to the conservation and enhancement of biodiversity, but also lay the foundation for Ülker to build a climate-resilient, traceable supply chain that is secure over the long term.

BIODIVERSITY STATUS AND RISK ASSESSMENT

In 2025, as part of the status analysis and risk assessment conducted using the WWF Biodiversity Risk Filter (BRF) tool, we carried out a location-based assessment of our 13 production facilities in Türkiye, Saudi Arabia, Egypt, and Kazakhstan, as well as the origin regions of agricultural raw materials sourced from 76 suppliers that are heavily used in our products and highly dependent on nature. We assessed the dependencies on ecosystem services across our value chain and the impacts of our activities on biodiversity, considering both physical and reputational dimensions. This study was designed in alignment with the initial steps of the LEAP (Locate, Evaluate, Assess, Prepare) methodology proposed by the Taskforce on Nature-related Financial Disclosures (TNFD), specifically the “Locate” and “Evaluate” phases, with the aim of establishing a solid foundation for our future reporting processes.



Risks from our own operations

In the biodiversity status analysis and risk assessment covering 70 hectares across Ülker's 13 facilities, the location of our Gebze and Karaman facilities within organized industrial zones (OSB) ensures that environmental impacts are managed under defined control mechanisms. Our other facilities are located within industrial and commercial zones, which serves as a supportive factor in managing environmental risks. In terms of dependency-related risks, the physical biodiversity risks at our facilities in Egypt and Saudi Arabia remain at very high levels due to reduced **water availability, air pollution, and extreme temperatures**. Of our 13 operational sites, we have developed biodiversity management plans for two sites covering a total of 8 hectares, which were identified as priorities due to their proximity to critical biodiversity areas or their high risk of significant biodiversity impacts.

Risks arising from raw material sourcing

A detailed assessment was conducted for Ülker's key raw materials—wheat, sugar, palm oil, cocoa, and hazelnuts—and the environmental and social risk factors in the regions where these raw materials are sourced were thoroughly examined. In these regions, declining soil quality and insufficient pollination are among the key dependency-related risks. In terms of impacts on biodiversity, deforestation and pollution were identified as the highest risk factors.

Assessed Operations and Sites with Significant Biodiversity Impacts

Dimension	Number of Sites	Area (Hectares)
General: Total number and total area of the Company's operational sites	13	70
Assessment: Number and area of sites for which biodiversity impact assessments have been conducted for the Company's own operational sites	13	70
Exposure: Number and total area of assessed sites with significant biodiversity impacts or located in proximity to critical biodiversity areas	2	8
Management Plans: Number and total area of sites with significant biodiversity impacts or located in proximity to critical biodiversity areas for which biodiversity management plans are in place	2	8

We primarily avoid impacts on biodiversity at source. We implement this approach through two channels:



Operational site selection: For new investment decisions, we treat proximity to Protected Areas (IUCN Categories I–VI), Key Biodiversity Areas (KBA), Ramsar wetlands, and High Conservation Value (HCV) areas as an exclusion criterion.



Supply chain management: Under the pladis **No Deforestation, No Peatland Development, No Exploitation (NDPE) Policy**, we do not accept palm oil or cocoa sourced from areas converted after the deforestation cut-off date.

Hazelnut

Origin
Türkiye
Highest dependencies
Soil conditions, Pollination
Key impacts
Pollution

Water risk*
<10%
low

Wheat

Origin
Türkiye
Highest dependencies
Water availability, Soil conditions, Pollination
Key impacts
Changes in land, freshwater and marine use; Pollution

Water risk*
>80%
very high

Sugar

Origin
Türkiye
Highest dependencies
Water availability, Soil conditions, Pollination
Key impacts
Changes in land, freshwater and marine use; Pollution

Water risk*
<10%
low

Cocoa

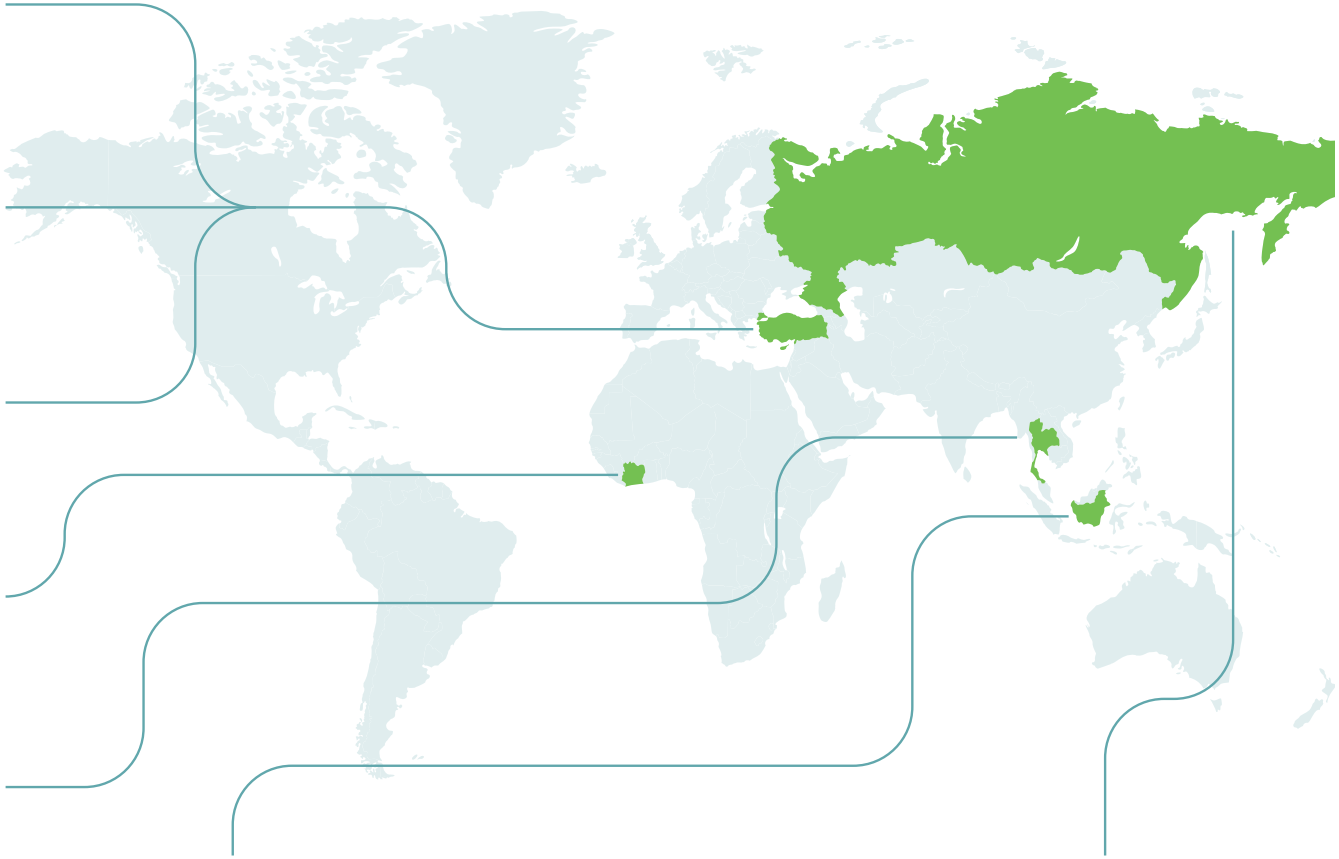
Origin
Côte d´Ivoire
Highest dependencies
Soil conditions
Key impacts
Loss of forest cover

Water risk*
<10%
low

Palm Oil

Origin
Malaysia
Highest dependencies
Pollination, High temperatures
Key impacts
Loss of forest cover, Pollution, Changes in land, freshwater and marine use

Water risk*
<10%
low



Palm Oil

Origin
Indonesia
Highest dependencies
Pollination, High temperatures
Key impacts
Loss of forest cover, Pollution

Water risk*
<10%
low

Wheat

Origin
Russia
Highest dependencies
Ecosystem conditions, Pollination, Forest fire risk
Key impacts
Changes in land, freshwater and marine use

Water risk*
20–40%
medium to high

*Water stress data were obtained from the WRI Aqueduct database.

Raw material	Rate of use in production	Concentrated regions	Biodiversity dependencies	Impacts on biodiversity	Mitigation Action Type	Mitigation Actions
 Wheat	**34%**	Konya, Türkiye	Wheat yield sourced from the Konya region shows a high level of dependency on natural resources (water, moisture, soil components, etc.) in the production process. Low levels of **soil organic carbon (SOC)** not only reduce agricultural productivity but also weaken essential soil functions, including maintaining soil health, supporting climate change adaptation, and the natural capacity to filter and purify water. On the other hand, the lack of sufficient natural areas weakens the ecosystems that provide **pollination** services, posing an additional risk to productivity.	Agricultural activities in the region may, over time, lead to the expansion of farmland and the degradation of natural river systems; this is expected to result in shrinking natural habitats and a loss of biodiversity. In addition, fertilizers and pesticides widely used in wheat production can adversely affect soil and water quality; this is expected to lead to water pollution and the deterioration of ecosystem health.	Mitigation	We are working to ensure the sustainable sourcing of biscuit wheat, supporting producers through contract farming practices and promoting the use of climate-resilient local seeds. In this context, we are also continuing the Biscuit Wheat Development Program in collaboration with the Bahri Dağdaş International Agricultural Research Institute. Further information is available in the **"Sustainable Wheat Initiatives"** section.
		Rostov, Russia	Wheat sourced from the Rostov region is highly dependent on ecosystem health and natural processes. Due to weak ecosystem integrity and connectivity in the region, there is a long-term risk of constraints on the quantity and quality of natural resources as well as access to ecosystem services. In addition, the lack of sufficient natural habitats surrounding agricultural areas in the region creates a dependency on **pollination** services. However, **the risk of forest** fires is at a significant level.	The expansion of agricultural land in the region and the increasing use of water resources may result in the loss of natural habitats and the degradation of eco-systems. Opening new areas for agriculture can cause negative impacts such as soil loss and disruption of water flows, which may threaten biodiversity.	Restoration / Rehabilitation	In addition, through our regenerative agriculture project, initiated in 2024, we aim to protect soil health, support biodiversity, and enhance carbon sequestration. For more information, please refer to the **"Regenerative Agriculture"** section.

Raw material	Rate of use in production	Concentrated regions	Biodiversity dependencies	Impacts on biodiversity	Mitigation Action Type	Mitigation Actions
Sugar	**20%**	Konya, Türkiye	Sugar sourced from the Konya region is highly dependent on natural resources in the production process, while the region faces **very high water risk** due to limited water availability. In addition, **soil quality** in the region is low. The lack of sufficient organic carbon in the soil reduces productivity and weakens key functions, including maintaining soil health and filtering water. In addition, the lack of sufficient natural areas adversely affects **pollination** services, which, in turn, indirectly puts crop yield at risk.	In the region, biodiversity faces impact risks from pollution, land use change associated with sugar production, and pressures on water resources. The expansion of agricultural land and increasing use of water resources may result in the loss of natural habitats and the degradation of ecosystems. Agricultural inputs such as fertilizers and pesticides can adversely affect soil and water quality, putting pressure on the environment.	Mitigation	To advance responsible sugar sourcing, we make certified purchases, even if in small volumes. Going forward, we aim to expand the scope of these purchases and strengthen sustainability practices in sugar sourcing. In line with our balanced nutrition approach, we achieved our target of reducing 3,000 tons of sugar—part of our efforts to decrease **sugar, salt, and fat**—ahead of schedule. At the same time, we continue to provide consumers with more alternatives by offering no-added-sugar products. Further information is available in the **"Well-Being and Balanced Nutrition"** section.
Vegetable oil	**13%**	Pahang & Johor, Malaysia	Palm oil sourced from Malaysia's Pahang and Johor regions is highly dependent on **pollination** services. Analyses conducted in these regions reveal a very high risk to the continuity of pollination due to insufficient natural habitats.	Palm oil production in Malaysia puts pressure on biodiversity through deforestation and pollution.	Avoidance	Since 2018, pladis has been working in collaboration with the Earthworm Foundation to increase traceability in the palm oil supply chain. In this way, deforestation risks are continuously monitored and preventive measures are implemented. Further information is available in the **"Vegetable Oil"** section.
		Central Kalimantan & Jambi, Indonesia	Palm oil sourced from Indonesia's Central Kalimantan and Jambi regions carries a lower level of risk in terms of dependency on nature compared to other raw material sourcing regions.	Palm oil sourced from Indonesia puts pressure on biodiversity due to the risk of deforestation.		

Raw material	Rate of use in production	Concentrated regions	Biodiversity dependencies	Impacts on biodiversity	Mitigation Action Type	Mitigation Actions
Cocoa	**9%**	Gôh-Djiboua & Montagnes, Côte d'Ivoire	Cocoa sourced from the Gôh-Djiboua and Montagnes regions of Côte d'Ivoire is highly dependent on **soil quality**. Assessments conducted in these regions show that soil organic carbon (SOC) levels are low and that soil fertility and water retention capacity are important for production continuity.	Cocoa production in the region drives deforestation, putting pressure on biodiversity. This may reduce ecosystem services and put biodiversity at risk, potentially undermining supply chain sustainability.	Avoidance / Transformation	As part of the "Beyond Cocoa" project carried out with the Earthworm Foundation, we conduct monitoring and improvement activities in areas such as preventing deforestation, promoting agroforestry practices, and reducing pesticide use to mitigate impacts in the cocoa supply chain. You can find more information in the **"Beyond Cocoa"** section.
Hazelnut	**1%**	Giresun, Türkiye	Hazelnuts sourced from the Black Sea Region (particularly Giresun, as well as Ordu and Trabzon) are highly dependent on **soil quality** and **pollination** services. Low soil organic carbon (SOC) levels in the region pose a risk that may adversely affect soil fertility and long-term production capacity. Moreover, limited natural habitats weaken pollination services, indirectly putting pressure on crop yields.	Chemicals used in agricultural activities, particularly fertilizers and pesticides, cause soil, air, and water pollution and threaten ecosystem health.	Minimization / Transformation	We launched the Beyond Hazelnut program to maintain Türkiye's leading position in hazelnut production through sustainable methods. Through composting training, integrated pest management methods, the use of microbial fertilizers, soil analyses, and seedling support, we empower farmers and contribute to local development. You can find more information in the **"Beyond Hazelnut"** section.

Ülker My Beautiful Country Forest is Growing

We continued expanding Ülker Beautiful Country Forest in 2025. While continuing to support the "A Breath for the Future" sapling planting campaign launched by the Ministry of Agriculture and Forestry in 2019, we planted 15,850 saplings in Karaman and Ankara on November 11, National Afforestation Day. The total number of saplings in Ankara, Karaman, Kocaeli, Muğla, Elazığ, Eskişehir, Hatay, and Gümüşhane reached 194,350.

You can find the details of our **Ülker Beautiful Country Forest** project here.

REGENERATIVE AGRICULTURE

Regenerative agriculture is a holistic farming model that retains carbon in both soil and vegetation, reduces greenhouse gas emissions, protects biodiversity, enhances soil water retention capacity, limits pesticide use, and improves farmers' incomes. Accordingly, we aim to expand regenerative agriculture practices to 10,000 decares of land by 2030.

The pilot project launched in Kırıkkale in 2024 expanded across Kırıkkale and Konya in 2025, reaching 1,060 decares in the Advancing Farmer group and 5,800 decares in the Engaging Farmer group; overall, 10.6% of the 2030 target was achieved. Looking at the project's key results for the season, wheat yield increased by 22% in rainfed farming areas, while fertilizer-related carbon emissions decreased by 10% and energy-related emissions by 4%. In areas where irrigation efficiency practices were implemented, irrigation-related energy emissions decreased by 32%, while yield increased by 21%.



We focus on **preserving the natural structure and nutrient content of the soil** to ensure the sustainability of our agricultural raw materials, thereby **enhancing biodiversity.**

AGROFORESTRY

Agroforestry stands out as a method that integrates agricultural and forestry practices, contributing to both biodiversity conservation and the sustainability of natural resources. With this approach, we continue to implement initiatives to support biodiversity in the regions where we source cocoa.

Agroforestry practices support biodiversity by protecting the habitats of diverse plant and animal species. Integrating forestry elements into agricultural areas creates natural habitats for birds, insects, and other species. This practice prevents erosion, protects soil, balances the water cycle, enhances soil fertility, conserves water resources, and strengthens the sustainability of agricultural land.

In 2025, the agroforestry pilot project conducted in collaboration with AGROMAP expanded to two cooperatives, 320 farmers and 637 hectares. At the DAKUA Cooperative, 387 hectares of land belonging to 196 farmers were mapped, and 16,266 forest and fruit trees were planted across six different areas. Species such as Acajou, Akpi, Fraké, Framiré, and Petit cola were selected to enhance sustainability and diversify farmer incomes in cocoa production systems, as they combine income-generating potential with agroforestry benefits such as rapid growth, shade provision, and soil improvement. Farmers received training on agroforestry and were raised awareness of good agricultural practices, and agricultural kits were also distributed.

As part of the pilot project ongoing since 2024, a total of 9,007 trees are being monitored across 250 hectares with 124 farmers at the COODIG Cooperative. These farmers were organized into 10 groups based on their regions and received training and support on income-generating activities.



VALUE CHAIN

We create lasting sustainable impact by establishing systems that strengthen quality, food safety, and operational efficiency at every stage of our value chain, which we manage through a holistic approach that considers environmental, social, and economic impacts together.

- Sustainable Agriculture and Raw Materials
- Quality and Food Safety
- Sustainable Supply Chain Management
- Operational Excellence



VALUE CHAIN

As Ülker Bisküvi, we manage our value chain with a holistic approach that considers environmental, social, and economic impacts. We develop practices that support local agriculture, establish partnerships that enhance farmer welfare, and create sourcing models designed to increase the use of local raw materials. We work in collaboration with farmers to promote sustainable and regenerative agricultural practices, contributing to enhancing the resilience of agricultural production. By establishing systems that strengthen quality, food safety, and operational efficiency at every stage of our value chain, we create sustainable value.



SUSTAINABLE AGRICULTURE AND RAW MATERIALS

According to the World Economic Forum's (WEF) 2025 Global Risks Report, natural resource shortages are among the most critical global risks over the next decade.[37] This transformation requires agriculture to move beyond production, with a focus on conserving natural resources, redesigning production models, and strengthening resilience across the value chain. According to the UN Food Systems Transformation Report 2025, food systems account for 31% of global emissions, while 30% of the food produced is lost or wasted.[38] In addition to these data, a growing population, changing climate conditions, and limited natural resources require agriculture to move beyond simply producing more and evolve into a smarter, more resilient, and more responsible system. In line with this transformation, through the long-term partnerships we have developed with farmers and the regenerative agriculture practices we are expanding in the field, we strengthen production continuity while contributing to the restoration of agricultural ecosystems.

By implementing regenerative agriculture practices on 10,000 decares of wheat cultivated land and agroforestry practices across 20,000 decares by 2030, we aim to strengthen soil health, reduce our environmental impacts, and create a value chain that supports farmers' economic and social well-being. We develop models to increase the share of domestic sourcing in order to reduce potential supply chain risks and support continuity of access to raw materials. This approach enhances traceability while supporting local producers and contributing to the development of local economies.

[37] World Economic Forum Global Risks Report 2025
[38] UN Food Systems Transformation Report 2025

We source raw materials from regional suppliers close to our production facilities to reduce logistics-related emissions during transportation. Despite a 929-ton increase in the amount of raw materials we purchased, **we reduced our logistics-related carbon emissions by 3,892 tCO_2e in 2025.**

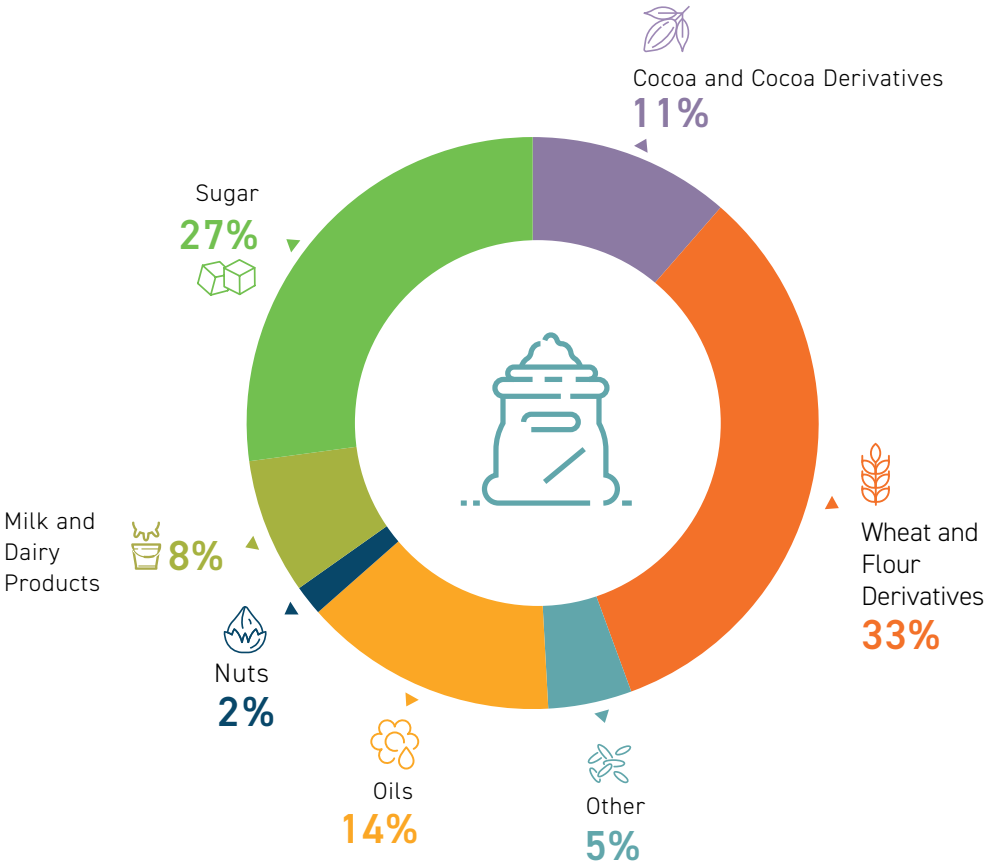
By 2030, we aim to raise the share of domestic sourcing for agricultural raw materials—excluding cocoa and palm oil—above 90%. In 2025, of the 2,076 suppliers we collaborated with, 94.4% were local, with payments to these suppliers representing approximately 58.5% of our total supplier expenditures.

Main Raw Materials Used in Production at Ülker Türkiye Facilities and Greenhouse Gas Emissions from Raw Materials

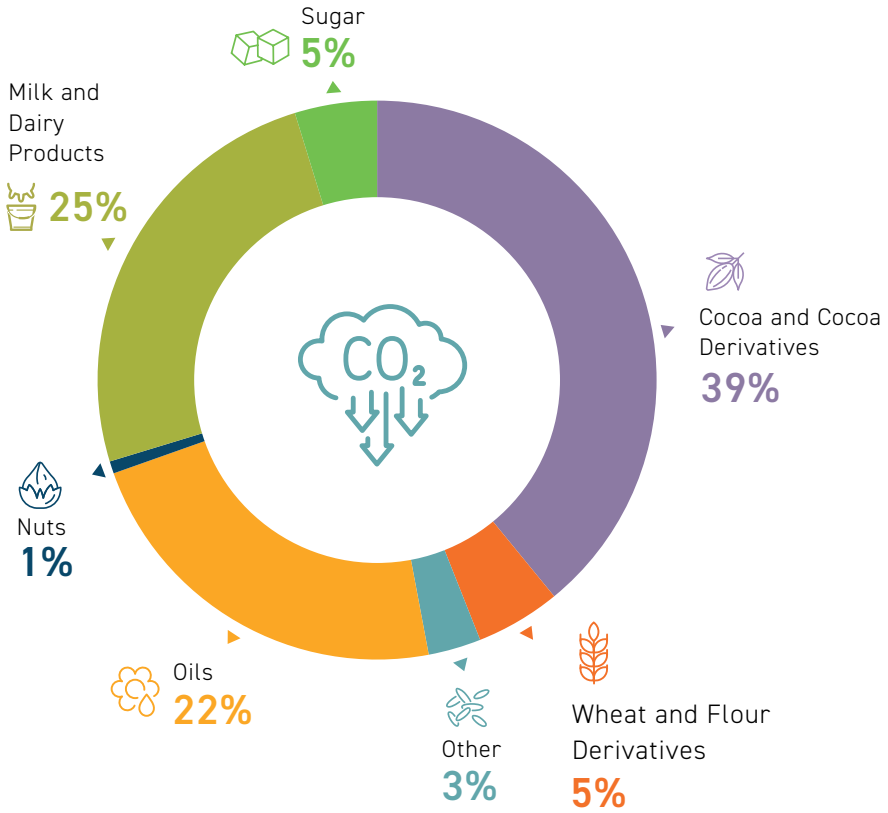
Ülker Türkiye Facilities	Emissions (tCO_2e)	Raw Material Quantity (tons)
Cocoa and Cocoa Derivatives	609,645	62,269
Wheat and Flour Derivatives	76,660	179,995
Oils	351,707	78,420
Nuts	11,112	9,314
Milk and Dairy Products	389,213	41,802
Sugar	74,178	148,039
Other	47,564	25,817



Ülker Türkiye Facilities Shares of Main Raw Materials Used in Production (%)



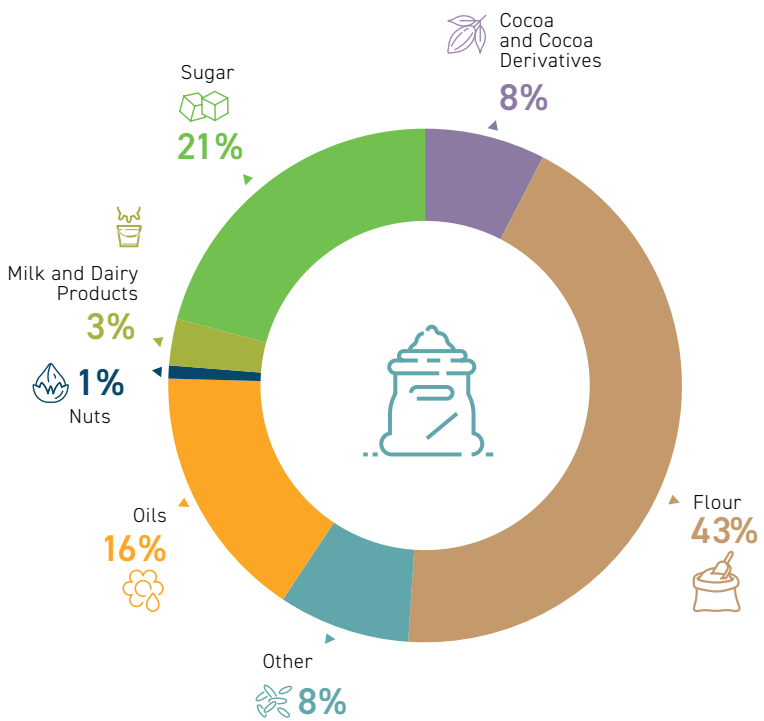
Ülker Türkiye Carbon Emissions of Main Raw Materials Used in Production (%)



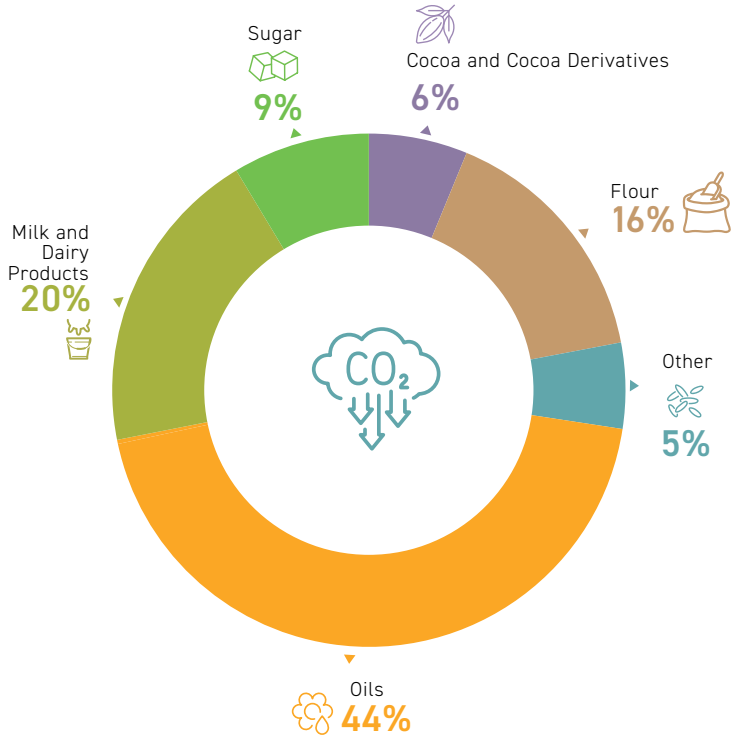
Main Raw Materials Used in Production and Greenhouse Gas Emissions from Raw Materials in Ülker Overseas Facilities

Ülker Overseas Facilities	Emissions (tCO_2e)	Raw Material Quantity (tons)
Cocoa and Cocoa Derivatives	16,031	8,904
Flour	40,693	51,023
Oils	113,932	18,890
Nuts	672	962
Milk and Dairy Products	50,146	3,448
Sugar	22,250	24,433
Other	13,912	9,728

Ülker Overseas Quantity of Main Raw Materials Used in Production (%)



Ülker Overseas Carbon Emissions of Main Raw Materials Used in Production (%)



SUSTAINABLE RAW MATERIAL SOURCING AND CERTIFICATION

Sourcing our key raw materials from responsible, sustainable, and traceable sources is at the core of our value chain management. Accordingly, we work with independent certification and accreditation programs for our priority agricultural raw materials, monitoring and reporting our coverage rates annually.



You can reach **Global Responsible Sourcing policy** here.

Raw Material[39]	Certification	Certified Share of Total Sourcing
Cocoa	Fairtrade	0.1%
Sugar	FSA 2.1 (Silver)	1%
Palm Oil	RSPO	0.5%
Wheat	Aliağa Wheat[40]	4%

[39] Soy, coffee, tobacco, and cotton are not used in our production processes.

[40] A wheat variety developed to be disease-resistant and climate-resilient.

Cocoa: Following Fildisi Cocoa Industry's receipt of Fairtrade Certification in August 2025, 0.1% of our total cocoa sourcing now comes from certified sources.

Sugar: As part of the FSA (Farm Sustainability Assessment) program conducted in collaboration with Konya Şeker, 60 farmers were assessed. One percent of our total sugar sourcing is covered by this program, and our FSA 2.1 score reached the Silver level at 84.1%.

Palm Oil: Through the collaboration between pladis and the Earthworm Foundation that began in 2018, we have been carrying out comprehensive initiatives to increase traceability in our palm oil supply chain. In 2025, our sourcing rate from Deforestation Conversion Free (DCF) areas reached 55%. With the support of the Earthworm Foundation, our suppliers' compliance with NDPE policies—covering deforestation, peatland conversion, and exploitation—is regularly monitored. Increasing the share of certified palm oil in our sourcing is among our priority targets.

CERTIFICATION OF ANIMAL-DERIVED RAW MATERIALS AND ANIMAL WELFARE

Dairy products (5%) and eggs (2%) are among the key animal-derived raw materials used in our production processes.[41] As Ülker Bisküvi, we prioritize animal welfare in our sourcing practices for animal-derived raw materials. Under the Global Supplier Code of Conduct, our suppliers are expected to meet the nutritional, environmental, and ethical needs of farm animals and comply with applicable local laws and regulations. You can access our policy commitment **here**. In line with this commitment, we monitor operational animal welfare standards in our supplier selection and evaluation processes and expect minimum requirements for nutrition, housing, and health conditions to be met. For animal-derived raw materials, which account for only a very small share of our raw material inputs, we aim to expand the scope of certified sourcing over the medium term.

Although international certification programs for animal-derived products (e.g., GAP, Certified Humane) are not yet widely adopted in Türkiye, we continue to monitor operational animal welfare standards in our supplier evaluation processes. Over the medium term, we aim to expand the scope of certified sourcing for these raw materials as well.

You can access our global **Animal Welfare Policy** here.



[41] At Ülker, aquaculture products, beef, pork, and fishery products are not used in our production processes.

SUSTAINABLE WHEAT INITIATIVES

REGENERATIVE AGRICULTURE IN WHEAT PRODUCTION

The wheat we use in our products accounts for 38% of our total raw material needs. According to the Food and Agriculture Organization of the United Nations (FAO)[42] The State of Food and Agriculture 2025 report, approximately 20% of global agricultural land is experiencing declining productivity, while land degradation reduces potential production to below 70% in some regions. This puts restoring soil health at the heart of global food security. In this context, we continue our efforts toward our target of implementing regenerative agriculture practices on the 10,000 decares of land where we operate by the end of 2030. Our pilot project, launched in Kırıkkale, Konya, Kırşehir, Çorum and Ankara in 2024 with 60 farmers to reduce our environmental impact on land under contract farming managed under our coordination, expanded to cover Kırıkkale, Kırşehir, Çorum, Ankara, Aksaray, Yozgat and Konya in 2025 and continues with a total of 101 farmers—18 engaged in advanced regenerative agriculture and 83 in transition-stage.

Farmers in the program are monitored using digital tools such as digital soil analysis, satellite-assisted crop growth monitoring, moisture maps, and moisture-temperature sensors. The field's microclimate, including wind direction, light intensity, air temperature, humidity, and rainfall, is monitored weekly. Tailored fertilization recommendations are developed for each farmer, thereby reducing input use, while aiming to enhance the soil's carbon sequestration capacity.

Within the project, farmers are classified into three levels according to their adoption of regenerative agriculture practices: "Engaging" farmers, who are in the transition phase and receive support in technological monitoring and 4R nutrient management; "Advancing" farmers, who demonstrate multi-year progress in at least two development* areas; and "Leading" farmers, who achieve continuous improvement across all four areas.

* Development areas: Soil health, climate, water, biodiversity

[42] FAO The State of Food and Agriculture 2025

GOALS

Reduce Emissions



Increase the Soil's Carbon Sequestration Capacity



Protect Biodiversity



Optimize Water Use



Improve Soil Health



Improve Farmer Welfare





You can access the **Regenerative Agriculture in Wheat Production p**roject's promotional video here.



At the Sustainable Food Awards organized by the Sustainability Academy, we won first place in the **"Sustainable and Regenerative Agriculture"** category with our Regenerative Agriculture Project.



NURİ ÖZGEN
COMMERCIAL MANAGER, FURSA TİCARET

The regenerative agriculture practices we implement together with Ülker represent a critical transformation toward restoring the health of soils degraded by years of uncontrolled fertilizer and pesticide use and excessive tillage. These practices, which continue across all regions under contract farming, make it possible to achieve higher yields with less fertilizer, pesticides, and water by improving soil organic matter content, water retention capacity, biological activity, and nutrient retention. Against the backdrop of shrinking cultivated areas and a growing population, Ülker's commitment to placing regenerative agriculture at the heart of its wheat sourcing goes beyond securing raw materials, becoming a strategic investment in the future of agriculture in Türkiye. To overcome the financing, technical capacity, and awareness barriers to scaling up at the field level, combining Ülker's direct collaboration with farmers with government incentive programs is creating momentum that could make regenerative agriculture a shared vision not only for pioneering companies, but for the entire sector.

Regenerative agriculture program scope

Project Scope	Advanced Regenerative Agriculture Program (Advancing Farmer Group)		Transition-Stage Regenerative Agriculture Program (Engaging Farmer Group)	
Yıl	2024	2025	2024	2025
Number of farmers	10	18	50	83
Number of fields	10	27	50	118
Land area, decares	300	1,060	1,500	5,800

Technological and Digital Monitoring Tools

As part of the project, fields are continuously monitored using **satellite systems**; any issues identified in crop growth are immediately communicated to farmers, enabling rapid intervention. Using data obtained **from temperature and humidity sensors**, farmers are warned in advance of risks such as frost, drought, and sudden temperature changes, and provided with expert support on need-based irrigation. The field's microclimate is regularly monitored using digital tools. Data such as wind direction, light intensity, air temperature, humidity, and rainfall are monitored weekly using moisture-temperature sensors. Farmers in the program are supported through **Digital Soil Analysis** processes to determine their fertilizer needs.

2024/2025 Season Monitoring Activities

Indicator	Advanced Regenerative Agriculture Program (Advancing)	Transition-Stage Regenerative Agriculture Program (Engaging)	Benefit
Satellite Monitoring, decares	1,060	5,800	Enables farmers to remotely monitor their fields and provides an early warning system for crop growth.
Digital Soil Analysis, quantity	51	129	Fertilizer needs are determined based on chemical soil analysis, optimizing fertilizer use.
Remote Agronomic Support	6 calls per farm	4 calls per farm	Strengthens farmers' decision-making processes.
Carbon Footprint Analysis, quantity	27	15	A data-driven approach enables the calculation of yield and carbon footprint per decare.
Field Visits, quantity	4	2	Supports data verification and helps strengthen farmers' trust.
Climate Sensor Stations, quantity	21	-	Provides an early warning system for frost and drought risks.
Soil Moisture Sensor, quantity	2	-	Optimizes water use and enables monitoring of crop stress.
Soil Carbon Analysis, quantity	51	-	Supports the reporting of soil carbon levels.

Regenerative Agriculture Practices

At the end of the 2024/2025 season, detailed farmland analyses were conducted for all Regenerative Agriculture farmers following visits by our agronomists. Based on these analyses, individual regenerative agriculture roadmaps were created for the 2025/2026 planting season. These roadmaps cover practices such as **4R Nutrient Management (right source, right rate, right time, and right place**), cover crop use, minimum tillage, irrigation efficiency, and hedgerow establishment. This season, five working groups were established, each implementing a different combination of practices. The working groups implement different combinations of practices such as integrated nutrient and pest management, cover crop use, minimum tillage, irrigation efficiency, and hedgerow establishment.

As part of the hedgerow practice, which supports carbon sequestration in addition to serving purposes such as acting as a windbreak against hot, dry winds and preventing road dust, 20 almond, 10 apricot, and 12 apple trees were planted along the edges of three fields covering a total area of 15.2 hectares.





Hedgerow practice

Hedgerow practice

~268 kg/ha

of greenhouse gas emissions removed

In terms of irrigation efficiency, soil moisture levels are regularly monitored using **moisture sensors**, enabling irrigation to be carried out as needed. This approach aims to prevent water waste by ensuring that crops receive exactly the amount of water they need. Irrigation is planned in line with soil moisture levels, preventing water use beyond crop requirements. As part of irrigation efficiency efforts, irrigation timing and volume are optimized in two fields (365 decares) using real-time data obtained from soil moisture sensors.

In addition, vetch was planted across a total area of 227.9 decares in nine different fields as part of **reduced tillage and cover cropping** practices. By keeping the soil covered with cover crops rather than leaving it fallow, this method helps retain soil moisture and aims to increase water retention capacity, particularly in regions facing drought conditions. The cover cropping practice helps prevent erosion and contributes to improving soil fertility over the long term.



Vetch (cover crop) and temperature sensor practices

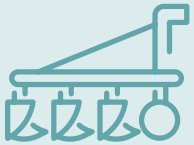


Soil moisture sensors

Tillage and cover cropping practices

~182 kg/ha

of greenhouse gas emissions were removed

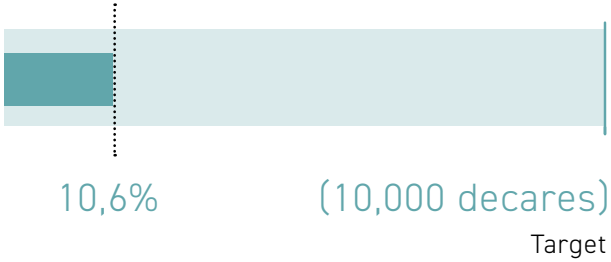


Implementation Rates of Regenerative Agriculture Practices Across the Total Area (%, 2024–2025)

Practice	Implementation Rate (%)
Integrated Nutrient Management (4R)	100
Cover Crop Usage	22
Minimum Tillage	22
Irrigation Efficiency	34
Hedgerow Establishment	12



We aim to implement regenerative agriculture practices on 10,000 decares of land by 2030.



In the 2024/2025 season, the Advancing Farmer Group implemented regenerative agriculture practices across 1,060 decares of land, thereby completing 10.6% of the 2030 target. In addition, the Engaging Farmer Group was included in monitoring and support activities across 5,800 decares of land.





Soil Health and Biodiversity Analysis

As part of the Regenerative Agriculture Project, a soil health and biodiversity analysis was conducted to assess soil health in fields where **hedgerow establishment, vetch sowing, and regenerative agriculture practices were implemented, as well as in control fields**, to evaluate the impacts of different agricultural management practices on soil health. During the assessment, soil health was evaluated based on **biological, chemical, and functional indicators**. Soil samples were collected **at depths of 0–5 cm and 5–10 cm** to analyze effects across different soil layers.

DNA analysis findings showed that fields with cover crops and hedgerows significantly outperformed conventionally farmed fields in terms of microbial biodiversity, water retention capacity, and soil organic matter cycling. Phosphorus cycling, carbon cycling, and organic matter decomposition also reached their highest levels under these two models, while in conventional fields, most of these indicators either remained at very low levels or were not detected at all. These results provide the basis for expanding cover crop and hedgerow practices to more farmers in the 2025/2026 season. These practices strengthen soil health, support biodiversity, and enhance long-term carbon sequestration capacity.

To prevent adverse impacts on biodiversity across our value chain, we combine spatial, technological, and temporal approaches.

- **As part of spatial measures,** climate and ecological risk mapping is conducted, with drip irrigation and sensor technologies prioritized in regions experiencing high water stress.
- **As part of technological measures;** satellite monitoring, temperature and humidity sensors, and digital soil analysis are used.
- **As part of temporal measures,** following the harvest of the main crop, vetch is planted as a cover crop during periods when the soil would otherwise remain bare, minimizing soil erosion, nutrient loss, and pressure on microbial life. Irrigation timing is optimized using real-time data obtained from soil moisture sensors, reducing unnecessary water use and the associated pressure on ecosystems.

According to the results of the soil health study

- An assessment across all major soil microbial groups showed that the area planted with vetch had the highest biodiversity (archaea: 57.7%; bacteria: 43.5%; fungi: 37%; eukaryotes: 53.4%). This was followed by the area where hedgerows were established.
- Enzyme activity reached its highest level in the area with hedgerows (4.91%). In contrast, water retention capacity (19.33%) and aerobic respiration values (30.7% and 24.9%) were highest in the area planted with vetch.
- Heavy metal tolerance (1.79% and 1.73%) and temperature tolerance (15.28% and 5.66%) showed higher values in areas planted with vetch and areas with hedgerows, while remaining at low levels in other areas.
- Phosphorus cycling (0.75% and 0.47%), carbon cycling (15.54% and 6.19%), and organic matter decomposition (25.85% and 21.36%) were observed at their highest levels in areas planted with vetch and areas with hedgerows.



Farmer Trainings

While farmers receive training on regenerative agriculture practices and financial literacy, on-site support is provided for the challenges they encounter through farm visits conducted by agronomists. Carbon footprint calculations are also conducted regularly to reduce CO_2 emissions and promote data-driven sustainable farming practices.

In 2025, the project's training content was also expanded. A total of 117 farmers received 32 hours of training. Topics covered included pest control, fertilization timing and crop rotation, as well as the ecological benefits of canola, land use, climate risks and agricultural insurance, farm budgeting, appropriate pesticide selection and dosage, and regenerative agriculture practices focused on soil health.

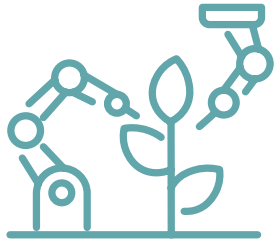
Carbon Footprint Calculation

As part of the project's data-driven farming and input optimization efforts, all inputs used by farmers were monitored, and yield and field-level carbon emission values were calculated using the **Cool Farm Tool** digital carbon calculator. In dry-farmed areas, a 22% increase in yield was observed compared with the previous year's regional average, while fertilizer- and energy-related carbon emissions were reduced by 10% and 4%, respectively. In irrigated areas, despite a 21% increase in yield, fertilizer- and energy-related carbon emissions were reduced by 6% and 32%, respectively.*

You can find detailed information about the project in the **Ülker Regenerative Agriculture Strategy Document** and the **2024/2025 Progress Report.**

*The yield improvements achieved under the project were attributed to the drought and frost events experienced in the previous year.

Innovation in Agriculture Project



Coordinated by BCSD Türkiye, the Innovation in Agriculture Project, for which we serve as the lead organization, is carried out in collaboration with Toros Tarım, Türkiye İş Bankası, and TSKB, with technical consultancy provided by Doktar Teknoloji. Aiming to integrate digital agricultural technologies and sustainable production approaches into field operations, the project is being implemented across a total area of 228 decares, comprising two wheat fields in Konya and three hazelnut orchards in Giresun.

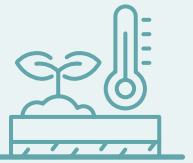
As part of the project, satellite-based farmland health monitoring, phenology cameras, climate and soil moisture sensors, pest monitoring systems, and digital flow meters were integrated into field operations. Soil and carbon analyses were conducted using the Cool Farm Tool (CFT), and plot-specific fertilization plans were developed for each farmer. Monitoring activities were carried out for sunn pest (Eurygaster integriceps) in wheat fields and brown marmorated brown marmorated stink bug (Halyomorpha halys) in hazelnut orchards, and farmers were supported in carrying out pesticide applications based on pest population density.

Farmer training sessions were held in Konya and Giresun on data-driven farming, digital farming tools, soil analysis-based fertilization, and sustainable practices, complemented by hands-on field visits.



SERKAN SOYUER

PROJECT MANAGER, BCSD TÜRKİYE, BUSINESS COUNCIL FOR SUSTAINABLE DEVELOPMENT TÜRKİYE



In the cross-sector initiatives we carry out at BCSD Türkiye in the field of agricultural sustainability, Ülker stands out for its openness to co-developing solutions focused on traceability, efficiency, and sustainable production with diverse stakeholders. This foundation for collaboration, built on data and best-practice sharing, delivers tangible results through the practical applicability of co-developed solutions in the field, their uptake across stakeholders, and their ability to generate measurable impact. Through its sustainability transformation in raw material sourcing, digital traceability, and farmer-focused programs, Ülker bridges regulatory, civil society, and private sector actors, assuming the role of a "catalyst and implementation leader" in the food sector's sustainability transformation.

ALİAĞA BISCUIT WHEAT

The Aliağa Biscuit Wheat Project, which we initiated in 2007 with the Bahri Dağdaş International Agricultural Research Institute, brought into our production processes a domestic wheat variety suitable for biscuit production that is high-yielding, disease-resistant, and climate-resilient. Since 2022, flour obtained from Aliağa wheat has been used in our products together with flour obtained from other wheat varieties. In 2025, planting was carried out across a total area of 50,000 decares in 11 provinces.

In 2025, our collaboration with the Institute was extended for another five years. Under the ongoing program, the quality, yield, and technological properties of wheat lines[43] are evaluated through detailed analyses conducted both in the field and laboratory, and lines that stand out in terms of suitability for biscuit production are identified. Under our contract farming model, we produce the seed ourselves and supply it to farmers with payment due at harvest, while monitoring crop development through regular field visits.



WATER RISKS PROJECT

As part of the project, drip irrigation systems were installed for wheat, silage corn, and grain corn production in Kırıkkale, and comparative productivity and water footprint analyses were conducted against conventional irrigation methods. The project findings showed that drip irrigation could deliver at least a 30% increase in wheat yield and a 21% reduction in water footprint. During the project, 100 farmers received training on modern irrigation methods and fertilization. The results obtained were shared with relevant public institutions, particularly the Ministry of Agriculture and Forestry, the Türkiye Water Institute (SUEN), and the General Directorate of Water Management. Evaluations were made regarding the inclusion of the findings in the Water Efficiency Campaign and their integration into public policies.[44]



To analyze the impact of climate change on water resources, we led the Water Risks Project as its main sponsor. The project was carried out between 2022 and 2024 in collaboration with the Business Council for Sustainable Development Türkiye (BCSD Türkiye) and the Ankara University Water Management Institute.





[43]The term used for pure wheat populations that have not yet been officially designated as a "variety."

[44]The project has been completed.



BEYOND COCOA

Cocoa is one of the agricultural products most affected by climate change. At Ülker Bisküvi, we are establishing transparent and traceable structures in our cocoa supply chain to reduce its environmental impact and enhance its social contribution. Since 2012, as a member of the World Cocoa Foundation, we have been regularly following its informative sessions, closely monitoring projects and best practices in cocoa-producing regions, and updating our strategy accordingly.



Enablers: Collaboration, Partnership, Training, Support

	COMMUNITY	PLANET	PRODUCT
VALUE AREAS	IMPROVING PEOPLE'S LIVES	PROTECTING & RESTORING NATURAL RESOURCES	ENSURING PRODUCT SAFETY
STRATEGIC FOCUS AREAS	1 Farmer Welfare 2 Preventing Child Labor 3 Developing Local Communities	1 Protecting Forests & Biodiversity 2 Combating Climate Change 3 Responsible Use of Chemicals	1 Transparency & Traceability 2 Product Quality 3 Responsible Procurement
KEY FOCUS	PREVENTING CHILD LABOR	PROTECTING FORESTS	TRANSPARENCY & TRACEABILITY
STRATEGIC TOOLS	1 Supporting the Living Income Differential (LID) Program 2 Supporting the Child Labor Prevention Program 3 Developing social responsibility initiatives in partnership with local communities and NGOs 4 Developing farmers through training and coaching	1 Leveraging technology (satellites, GPS mapping) to protect forests and biodiversity 2 Reducing carbon emissions across the supply chain 3 Building local collaborations to educate farmers on the use of agricultural chemicals 4 Scaling up agroforestry practices	1 Establishing long-term partnerships with select suppliers 2 Publishing annual Sustainability Reports 3 Leveraging the latest technologies to ensure traceability and transparency from the field to the consumer
KEY APPLICATION	DEVELOPING FARMERS THROUGH TRAINING AND COACHING	LOCAL COLLABORATIONS	LEVERAGING NEW TECHNOLOGIES FROM THE FIELD TO THE CONSUMER

Our Beyond Cocoa program is implemented through our group affiliate Fildisi Cocoa Industry in Côte d'Ivoire, the Earthworm Foundation, and our Topkapı cocoa bean processing facility, establishing direct links with farmers and cooperatives. We have built our strategy around three key pillars: Community, Planet, and Product. By directly processing the cocoa beans we purchase at our own factory, we ensure the use of high-quality and traceable raw materials. We provide farmers with training on good agricultural practices and agroforestry, distribute region-appropriate seedlings, and integrate Ülker's sustainability standards throughout the entire value chain.

Through our project, which focuses on Our Community, Planet and Product, we aim to create a positive and lasting impact across our supply chain. Within this framework, our strategy spans a broad range of initiatives, from agroforestry practices that promote regenerative agriculture to social programs that enhance the well-being and resilience of farming communities. Our activities are underpinned by full traceability, ethical production principles, and the long-term partnerships we have established with cocoa cooperatives. At the same time, we manage risks by establishing systems for responsible pesticide management and the prevention of child labor, while economically and socially empowering women and youth to make the positive impact we create lasting.

In 2025, we sourced 8,270 tons of cocoa directly from Côte d'Ivoire through dedicated partner cooperatives that support our Beyond Cocoa sustainability initiative, and we aim to further increase this rate each year. Our supply chain in Côte d'Ivoire has expanded to include six cooperatives. By directly processing cocoa beans, we ensure high quality and provide full traceability.



JÉSUS DAMOA

PROJECT MANAGER, AGROMAP-CI (CÔTE D'IVOIRE)

In cocoa-growing communities in Côte d'Ivoire, we are witnessing firsthand how climate change and forest degradation are increasingly affecting farmers' livelihoods and the future of cocoa production. Ülker's investment in agroforestry therefore goes far beyond an environmental commitment; it directly contributes to strengthening the resilience of farming families, restoring shade cover on producers' farms, and building a safer and more sustainable agricultural system for future generations. By combining agroforestry with training, agricultural support, and income-generating activities for producer groups and women, this holistic approach strengthens community resilience while also building a more stable and sustainable cocoa supply chain for Ülker. By bringing environmental restoration together with the economic realities of local communities, this collaboration is evolving into a long-term partnership that makes a difference in the lives of cocoa producers in West Africa and demonstrates what responsible sourcing truly means on the ground.

Deforestation Verification

We safeguard our commitment to no deforestation in our value chain through a transparent, technology-driven system. In 2025, Earthworm Foundation, the project consultant, analyzed 11,180 farms linked to our six cooperatives using satellite technology supported by Airbus infrastructure. Following the identification of two verified cases during the analysis, in line with our policy, we adopted a remediation strategy rather than removing the affected farmers from the system and included them in our agroforestry program to restore their land. This transparent and restorative action plan was also endorsed by our project partners, confirming that the cocoa sourced from the cooperatives from which we purchase directly comes from deforestation-free areas. We successfully completed this verification process for six cooperatives from which we source directly, avoiding 75,181 tons of CO_2e emissions.

Fildisi Cocoa Industry received its official Fairtrade Certification in August 2025. Under the EU Deforestation Regulation (EUDR), mapping of all farms in COODIG, DAKUA, SOCODD, SOCODS, CAPUM, and SCOOPAG was completed, with polygon mapping conducted for farms exceeding four hectares.



Beyond Cocoa - Social Impact

Support Area	Benefit Provided	Outcome
Agriculture and Climate Training	Training on good agricultural practices, agroforestry, pesticide management, and climate change.	Training provided to 161 farmers; in addition, 12 training sessions were held for 150 farmers as part of the Farmer Field Schools program.
One-on-One Technical Consulting and Needs Assessment	Field diagnostics, mapping, data collection, and technical coaching on farmers' land.	196 plots covering 387 hectares were assessed; detailed field data were collected from 471 farmers.
Agricultural Equipment Support	Producers' operational capacity was strengthened through basic equipment such as boots, machetes, and files.	150 farmers received agricultural kits.
Income Diversification Program	Alternative sources of income were developed to reduce farmers' dependence on cocoa.	124 farmers participated in income-generating activities; 10 producer groups were formed.
Additional Income Generation	Additional income was generated through poultry farming, cassava (a high-starch root crop), and rice cultivation.	Approximately 10.5 million CFA[45] francs in additional income was generated.
Household Resilience	The support provided enabled farmers to allocate their savings to education, healthcare, and agricultural investments.	Income and financial resources were reported to have been used for school expenses, healthcare costs, and agricultural inputs.
Agroforestry Investment	The planting of fruit and forest trees created potential for additional income and increased productivity in the future.	16,266 trees were planted; 196 farmers benefited directly.
Local Employment	Local labor was employed in field activities.	10 young forestry workers, 23 women workers, and 61 local workers earned income.
Women's Economic Empowerment	Their participation in income-generating activities and field activities was supported.	Women accounted for 38% of Income Generating Activities (IGA) beneficiaries.
Youth Empowerment	Technical forestry and seedling cultivation skills were developed.	10 young people received technical training and employment opportunities.
Access to Clean Water	Improved access to drinking water reduced time and health burdens.	Water pumps were installed in three rural communities. Women's need to carry water over long distances was reduced.
Support for Access to Education	Initiatives were implemented to support children's access to school and continued attendance.	2,000 school kits were distributed.
Improvement of Educational Infrastructure	Learning conditions in schools were improved.	500 school desks and tables were donated to nine schools.
Supporting Girls' Continued Education	Access to menstrual hygiene products was increased.	900 hygiene kits were distributed.
School Hygiene Conditions	Safe sanitation infrastructure was established.	Six toilets were built at a primary school.
Child Protection System	A monitoring mechanism was implemented to identify and remediate child labor risks.	4,520 farmers and 9,494 children were monitored under the system.
Access to Healthcare	Health and hygiene awareness was raised in rural areas.	2,440 people were reached through mobile health services.

[45] CFAF: The West African CFA franc, which is the official currency of Côte d'Ivoire.





Access to Clean Water

We develop social impact projects tailored to the real needs of farmers and their communities, delivering practical solutions to local challenges across our cocoa supply chain. As part of these efforts, water pumps were installed in three communities (Niouldé, Bouhoussoukro, and Tchoco) affiliated with three cooperatives to improve access to clean and safe drinking water. The project contributed to improving the daily living conditions of local communities; in particular, it reduced the need for women to travel long distances to access unsafe water sources for household needs. Community members can now access potable water close to their homes. As a result, the time and effort required to access water were reduced, while the wider use of safe drinking water was promoted, contributing to improved quality of life.

Women's Empowerment

In line with our Beyond Cocoa project's priority of women's empowerment, we continue to strengthen the sustainable cocoa supply chain in Côte d'Ivoire through social impact initiatives. In collaboration with Fildisi Cocoa and our partner cooperatives, we provide training to enhance the agricultural and business skills of women farmers, while engaging in one-on-one communication in the field to better understand their needs and social conditions.

In 2025, we worked with **747 women farmers** across six cooperatives. This figure represents **7.5%** of our total farmer network. To better understand the challenges women farmers face and their priority needs, we conduct dedicated surveys and needs assessments. Based on our findings, we design and implement projects to support women's economic and social empowerment. With these services for women in rural areas, we aim not only to provide temporary support but also to create lasting social impact that improves the quality of life of women farmers and their families.

Within the scope of our Beyond Cocoa initiatives, we provide **mobile healthcare service support to women farmers and their children in Africa.**



In November 2025, we delivered our mobile healthcare service for the third time, this year in the Yaoudé, Bédy Gouasson, and Goya communities of our partner cooperative DAKUA, in partnership with the Sauvons 2 Vies NGO. The healthcare service focused particularly on women's health and menstrual hygiene and included the following:

- 246 women underwent general health examinations;
- 70 people received prenatal consultations and 17 received postnatal consultations;
- 157 people received family planning counseling;
- 900 hygiene kits were distributed across five cooperatives;
- 700 adults and 750 young people received health and hygiene awareness training.

Overall, the Mobile Healthcare Service reached a total of 2,440 people.





Farmer Welfare

We care about farmers' welfare and carry out initiatives to improve the well-being of our farmers. We collect information on farmers' income levels through surveys conducted via the Farmforce[46] platform. Based on our findings, we develop income-generating activities (IGAs) and support farmers, particularly through practices such as agroforestry.

In this context, in 2025, through the Income-Generating Activities (IGA) Program implemented in collaboration with our agroforestry solution partner AGROMAP, we directly supported **124 farmers** from the COODIG Cooperative in diversifying their income sources. Rather than providing direct financial assistance to farmers, we adopted a sustainable model based on training and material kits, helping them establish their own businesses in short-cycle activities with strong local market demand, such as **broiler chicken farming, cassava farming, and rice production. Women accounting for 38%** of the farmers participating in the program further strengthens the project's focus on gender equality.

Supporting Farmer Families and Children

In 2025, our Child Labor Monitoring and Remediation System (CLMRS), implemented as part of our efforts to address child labor, continued to grow in both scope and impact. In 2025, monitoring activities expanded to five cooperatives, including CAPUM, COODIG, DAKUA, SCOOPAG, and SOCODD. The number of farmer families monitored increased from 3,557 to 4,520, while the number of children under monitoring rose from 7,359 to 9,494. These developments reflect our commitment to protecting children and building safe cocoa-producing communities, thanks to our strong presence in the field and systematic monitoring mechanisms.

You can access our **CLMRS monitoring system** report here.

The remedial actions implemented also expanded in scope in 2025:

- 5,764 school kits were distributed.
- 3 schools and 2 school cafeterias were renovated or built.
- 728 school desks and tables were distributed.
- 10 school toilets were built.
- 285 agricultural kits and 135 wheelbarrows were distributed.
- Awareness of child labor was raised among 4,520 farmers.

Agroforestry

We meticulously implement our agroforestry roadmap to facilitate the adaptation of cocoa trees to climate change and increase biodiversity. To address the vulnerabilities created by monoculture systems, we establish shade cover through seedlings planted among cocoa trees, while improving the physical and chemical quality of the soil and increasing resistance to pests and diseases.

In 2025, the agroforestry pilot project conducted in collaboration with AGROMAP was expanded to two cooperatives. At DAKUA, 387 hectares of land belonging to 196 farmers were mapped, and 16,266 forest and fruit trees were planted across six different areas. At SCOOPS COODIG, 124 farmers received training and support on income-generating activities such as cassava farming, rice production, and poultry farming. Under the pilot project, which has been ongoing since 2024, a total of 9,007 trees is being maintained across 246.85 hectares.

Our agroforestry strategy contributes to improving producers' living conditions and conserving natural resources. We also aim to support farmers in developing marketing opportunities for the products they obtain through agroforestry.

The total area under agroforestry practices in our cocoa farms has reached **637 hectares.**



You can access **Ülker Bisküvi's Agroforestry Policy and Roadmap here.**

You can access our **Agroforestry Progress Report** here.

[46]Farmforce is a digital platform that ensures product traceability from the field by enabling field teams in agricultural supply chains to collect data from small-scale farmers through mobile devices.

Farmer Trainings

In line with our sustainability policies, we continue to expand our training initiatives aimed at strengthening farmers' capacities in cooperatives. Through these trainings, we aim not only to expand sustainable agricultural practices but also to strengthen, through a holistic approach, the social well-being, economic resilience, and environmental awareness of farming families. With training programs spanning topics from children's rights to women's health and from good agricultural practices to income diversification, we aim to contribute to the development of a long-term, inclusive rural development ecosystem.

Good Agricultural Practices and Pesticide Management – Farmer Field Schools

With climate change increasing pest and disease pressure in cocoa farming, the responsible use of agrochemicals is becoming more critical than ever. The misuse of agrochemicals not only threatens soil and water quality but also puts farming families and local ecosystems at risk. In 2025, we developed the pilot field project, launched in 2024 to reduce chemical use in agricultural production and expand sustainable farming practices, into a more systematic and permanent structure. Last year, comprehensive data on field health, disease intensity, and frequency of chemical use were collected through the Farmforce software in fields mapped using GPS; 150 farmers received practical training in 12 sessions on pruning, weed management, the safe and limited use of agrochemicals, organic fertilization, and pest management. The graduation ceremony will be held in January 2026. At SCOOPS DAKUA, field diagnostic data were collected from 471 farmers.

The Farmer Field Schools model implemented in the Guibéroua region is built on three core elements: a regional training cycle in which training is repeated every three months; lead farmers selected from among participants who complete the training and take on a practical role locally; and a specialized working group selected from the community to support field activities. With this structure, we aim to foster behavior change at both the individual and community levels and to permanently integrate sustainable pest management into farming practices.

Training Category	Topic	Target Audience	Number Reached
Child Labor Monitoring and Remediation System (CLMRS)	Child labor awareness	All households covered by CLMRS	4,520 farmer families
Good Agricultural Practices and Environment (GAP)	Pruning, harvesting, agroforestry, pesticide management	Farmer Field School participants (COODIG)	150 farmers
Economic Empowerment (IGA)	Agricultural entrepreneurship; poultry farming techniques	Farmers selected for the IGA program	124 farmers
Social Welfare and Health	Menstrual hygiene and women's health awareness training	Young girls and women	750 people



BEYOND HAZELNUT

The Beyond Hazelnut project, launched to reinforce Türkiye's leading position in global hazelnut production, support producers in the Black Sea Region, and contribute to leaving more productive soils for future generations, was restructured in 2025 as a significant step in its transformation. While strengthening our environmental, social, and governance (ESG) performance, our project aims to expand sustainable and regenerative agriculture practices across the supply chain for hazelnuts, one of our raw materials.

Capacity Building and Women's Empowerment

The economic and social empowerment of women farmers in hazelnut farming is one of the key objectives of our project. In line with this objective, in 2025, we reached a total of 200 farmers, including 100 women, maintaining a 50% participation rate among women farmers. We provided them with more than 850 hours of practical training and consulting services on key topics such as composting, fertilization, pruning techniques, and Integrated Pest Management (IPM). Through these trainings, we believe we have enhanced our women producers' access to information, modern agricultural techniques, and resources, while strengthening their roles in production processes and their participation in decision-making processes.





ÇAĞLA TEMİZ

RESEARCHER, HAZELNUT RESEARCH INSTITUTE

The samurai wasp release activities we carry out with Ülker represent a science-based approach to suppressing the brown marmorated stink bug through biological control. In the field, we regularly monitor egg parasitism rates. Our initial findings indicate that the release efforts are contributing to reducing the pest population. Long-term monitoring and evaluation are needed to clearly establish the impact of these efforts on yield improvement and disease resistance. Ülker's approach, based on scientific partnership, demonstrates its preference for a data-driven, long-term approach over short-term gains. The climate-resilient varieties developed through our Institute's breeding and cultivation efforts, together with the sustainable production techniques being disseminated, make a significant contribution to reducing raw material supply risks for international food companies such as Ülker by ensuring continuity of production, reducing yield losses, and strengthening long-term hazelnut supply security.



Innovation and Digitalization

Our demonstration orchard at the Giresun facility, which represents the project's tangible implementation in the field, expanded its activities in 2025. The site makes a significant contribution to the project by serving as a modern processing facility, a 12-decare trial and demonstration orchard where Good Agricultural Practices (GAP) are tested, and a training center for farmers. Through a 24/7 WhatsApp support line, farmers can instantly reach expert agronomists and receive real-time information on orchard practices based on phenological monitoring and regional climate data.

By the end of 2025, the project had expanded to a total area of 2,510 decares across Esentepe, Kılıçlı, Örnekköy, Tepeköy, Yıldız, and Keşap in Giresun. In pilot orchards in this area that adopted sustainable farming techniques, average yield increased by 35%.

Three smart traps installed at project sites in Giresun are used to monitor pest populations in real time. The data obtained is intended to strengthen early warning mechanisms, reduce unnecessary pesticide use, and support more sustainable production practices.



AYŞE BAYRAKDAR
LEADING WOMAN FARMER
KEŞAP - BAYRAMŞAH / GİRESUN

After joining the program, we began implementing the practices in our orchard more effectively. This has both contributed to our household budget and reduced our labor requirements. Other farmers are curious about the practices in our orchard; by sharing what I do, I also encourage new farmers to join the project. Thanks to the training provided and the traps distributed as part of the project, we are able to effectively control the brown marmorated stink bug, which has had a significant impact in our region.

EMİNE BAYRAKDAR
LEADING WOMAN FARMER
KEŞAP - BAYRAMŞAH / GİRESUN

Before joining the program, I realized that I had been carrying out practices such as fertilization and pruning incorrectly. After the training, I began applying these practices in a more informed way, and I also try to share the correct methods with my neighbors. Irregular rainfall makes harvesting and drying difficult; thanks to the training, we have learned how to separate produce affected by the pest.

MİNİRE İSCAN
LEADING WOMAN FARMER
KEŞAP - KARAKOÇ / GİRESUN

After joining the project, I saw an increase in yield and learned the correct practices through the training. As they saw the changes in the orchards, farmers around me began asking what practices I was using. As brown marmorated stink bug populations increased, I applied the trapping method I learned during the training and shared it with other farmers.

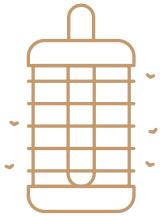


Integrated Pest Management

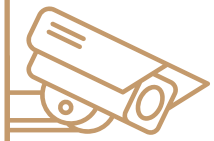
One of the most critical challenges this season was the threat posed by the brown marmorated stink bug. In response to this threat, a science-based and environmentally responsible Integrated Pest Management (IPM) system designed to minimize chemical use was implemented. As part of biological control efforts carried out in collaboration with the Hazelnut Research Institute, 9,000 samurai wasps were released into the ecosystem; pest populations were monitored in real time using 200 pheromone traps and three AI-powered smart camera systems. As a result of these measures, while pest counts reached 2,125 individuals in neighboring areas, the number was kept to 134 in the Giresun pilot area where the project was implemented.

EDUCATION AND TECHNOLOGICAL MONITORING (MECHANICAL)

200
Funnel Traps



Farmers were trained to recognize and mechanically remove pests during the early stages of infestation.



3
Smart Camera Monitoring Systems

Focus Districts
Piraziz, Bulancak and Kesap were selected as project hubs for intensive applications.









ECOLOGICAL BALANCE AND CONTROLLED (BIOLOGICAL AND CHEMICAL)



9,000
Samurai Wasps

To strengthen biological control, 9,000 samurai wasps were released in Giresun and some parts of Ordu. Regions with high pest density were prioritized.



Regional coordination was established. Data from traps and field observations are shared with the Hazelnut Research Institute to support scientific analysis.





Chemical Control:
Conscious Last Resort. Only when necessary, and always based on expert guidance.

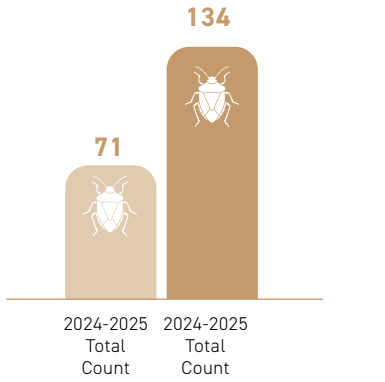
GİRESUN BROWN MARMORATED STINK BUG TRACKING REPORT: 2024-2026 POPULATION ANALYSIS



2-year analysis of the Brown Marmorated Stink Bug population increase and peak periods in the Giresun / Bulancak and Piraziz region

Giresun Population Data and Peak Period

88% increase
in population

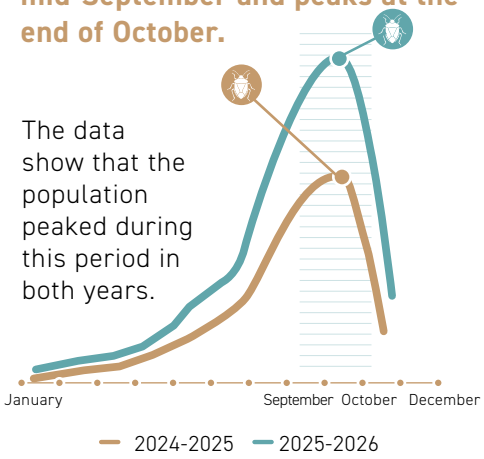


The total number increased from 71 in the 2024–2025 period to 134 in 2025–2026.

Critical Period: September – End of October

The population starts to rise in mid-September and peaks at the end of October.

The data show that the population peaked during this period in both years.



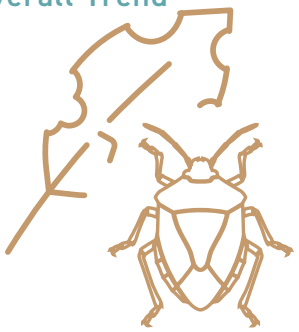
Focus Areas

Bulancak and Piraziz



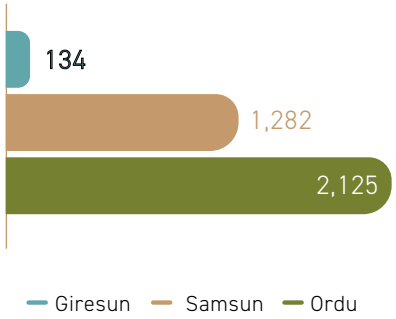
Data represents 3 main trap locations across **Bulancak (Pazarsuyu, Yıldız)** and **Piraziz** (Esentepe).

Regional Comparison and Overall Trend



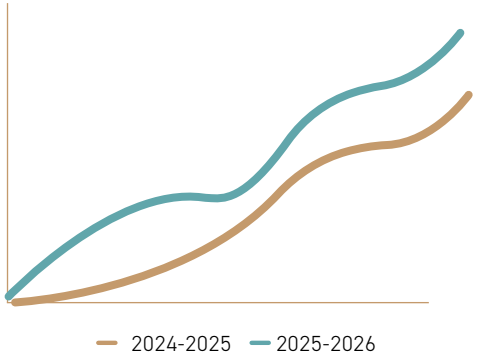
Competition with Neighboring Provinces

Although Giresun remains behind Ordu, and Samsun, the region has shown steady growth.



The cumulative increase

Trend the cumulative total trend across the region shows that the spread of the stink bug is starting earlier each year.



Region	2024-2025 Total Count	2025-2026 Total Count
Giresun (Focus: 3 Traps)	71	134
Samsun	1,021	1,282
Ordu	2.125	4,125

VEGETABLE OIL

Vegetable oil, one of the three most widely used raw materials in our production processes, plays a critical role in ensuring production continuity and cost advantage. Therefore, sourcing vegetable oil from responsible, sustainable, and traceable sources remains a priority for us.

Since 2018, as part of the ongoing collaboration between pladis and the Earthworm Foundation, we have been carrying out comprehensive initiatives to increase traceability in our vegetable oil supply chain. Through the data collection activities, we initiated at the plantation (field/farm) level in 2022, we strengthened the processes of identifying supply chain risks and conducting due diligence. These activities also play an important role in ensuring compliance with the EU Deforestation Regulation and global sustainability criteria.

In 2025, our global Deforestation Conversion Free (DCF) rate at pladis reached 55%. With the support of the Earthworm Foundation, our suppliers' compliance with NDPE policies covering deforestation, peatland conversion, and exploitation is regularly monitored.

Satellite monitoring systems are among the most effective tools for preventing deforestation in vegetable oil sourcing. To raise this rate to 100%, detailed data on plantation boundaries and their links to production facilities are being collected and analyzed.

Pladis and Ülker aim to build a structure that includes all stakeholders in the supply chain to achieve its traceability targets and to continue collaborating with the industry to increase participation in this framework.



QUALITY AND FOOD SAFETY

Food safety and quality management constitute one of the fundamental pillars of our sustainable value chain approach. We consider protecting consumer health at every stage from field to table and maintaining high quality standards among our priorities. Across all processes from production to consumption, we systematically assess biological, chemical, and physical risks, adopting a preventive approach and the principle of continuous improvement.

We implement a comprehensive Quality Management System across all our production facilities. All our production facilities hold GFSI-approved BRCGS certification, which is considered a top-tier global benchmark in food safety. In addition, all our facilities hold ISO 22000 and ISO 9001 certifications and operate in compliance with halal production requirements.



The main certifications held by Ülker Bisküvi's facilities include:

- BRCGS
- ISO 22000
- ISO 9001
- HALAL Certification
- KOSHER Certification
- RSPO Certification
- Fairtrade Certification
- Rainforest Alliance Sustainable Agriculture Certification



BORA SAĞIROĞLU

QUALITY AND OCCUPATIONAL HEALTH & SAFETY DIRECTOR, ÜLKER BİSKÜVİ

We manage certification processes such as BRCGS, standards recognized by the Global Food Safety Initiative (GFSI), RSPO (Roundtable on Sustainable Palm Oil), Rainforest Alliance, and Fair Trade as an integral part of our day-to-day operations; and we work in an integrated manner across our purchasing, production, warehouse, planning, and supply chain teams on critical areas such as traceability, supplier compliance, mass balance, and documentation consistency. Through supplier approval processes, risk assessments, product specifications, internal audits, and traceability controls, our quality systems are integrated with ESG requirements across the supply chain, directly contributing to Ülker's vision of responsible resource use, sustainable raw material sourcing, and reliable products. The discipline provided by certified systems supports reductions in rework, scrap, product losses, and unnecessary resource use through standardized process controls, hygiene plans, line validations, and root cause analyses, thereby making measurable contributions not only to food safety but also to waste, energy, and water management. By regularly monitoring indicators such as scrap/waste rates, rework, customer complaints, and process efficiency, we identify improvement opportunities and, through this holistic approach, support Ülker's "zero waste company" culture and 2050 Net Zero journey at the operational level.

AUDIT PROCESSES

We monitor and continuously enhance the effectiveness of our quality management system through periodic internal audits. We do not limit our quality assurance processes to production alone; we support them through internal and independent external audits covering the entire supply chain. We also subject our systems to independent and objective assessment through pladis laboratory audits. We evaluate risks at all stages, from raw materials to the final product, through critical control points, and by analyzing audit results, we drive lasting improvements across our procurement and production processes. In 2025, we successfully completed BRCGS, ISO 22000, ISO 9001, Halal, Kosher, RSPO, and Fair Trade audits.

CUSTOMER AND STAKEHOLDER FEEDBACK MECHANISM

We operate an accessible, transparent, and systematic complaint management mechanism through which our consumers and stakeholders can submit feedback regarding product quality and safety. Through the feedback management system operated via our Customer Communication Center, incoming feedback is recorded; each submission is classified in line with defined procedures and routed to the relevant departments.

Feedback concerning product quality, safety, and satisfaction is evaluated by specially trained teams. Where necessary, we conduct root cause analyses with the involvement of our production, quality assurance, and supply chain teams and implement corrective and preventive actions. Data obtained through the feedback management process are regularly used for product improvement, process development, and initiatives aimed at increasing customer satisfaction.

During the reporting period, we resolved **100%** of the feedback received in accordance with our company policies and defined resolution time targets. This mechanism forms part of our continuous improvement approach to product safety and quality management and fosters a transparent environment of accountability.

Our Customer Communication Center can be accessed via our **website and WhatsApp line**.



ON-SITE QUALITY

With the **"On-Site Quality"** project, we have made operational excellence part of our corporate culture. We have adopted preventing errors at the source and producing the right product the first time as a core principle.

To eliminate the risk of defects before products proceed to the next process stage, we implement comprehensive quality control and safety procedures across all our production processes. From raw material acceptance through production, packaging, and shipment, we conduct multi-stage quality inspections, HACCP (Hazard Analysis and Critical Control Points) analyses, Critical Control Point (CCP) controls, online sensor and camera monitoring, and automated controls. Production batches are regularly subjected to microbiological, chemical, and physical testing; potential sources of defects are identified at an early stage, and corrective and preventive actions are implemented. No product is released for shipment before the final product approval process is completed.

Thanks to this systematic and preventive approach, we maintain a high level of product safety and proactively manage potential product recall risks. In this context, no product recalls related to quality or food safety occurred during the year.

In 2025, as part of World Quality Week and World Food Safety Day, we organized plant tours, quiz competitions, and award programs. Through these activities, we strengthened two-way feedback mechanisms between employees and management and raised quality awareness.

Quality and Food Safety Training Programs

To support the continuity of our quality management system, we provided regular and comprehensive training to our employees. In 2025, we delivered a total of 11,354 hours of quality and food safety training to 6,162 employees across production, quality, R&D, and other relevant departments, covering topics such as RSPO, HACCP, customer complaint awareness, halal production, and packaging standards.



We expanded our training programs to include our suppliers. In 2025, we organized programs on Good Manufacturing Practices (GMP), pladis audits, and food safety, with the participation of more than 250 suppliers.

Quality Management in the Supply Chain

We systematically managed quality and food safety in the supply chain through risk assessment, performance monitoring, and audit planning. Through our Supplier Development Program, implemented with an "End-to-End Quality" approach, we supported our critical suppliers through audits, training, and guidance. In 2025, as a result of the activities conducted with 22 suppliers, we implemented systematic improvements in various areas, including technical practices and risk management.

SUSTAINABLE SUPPLY CHAIN MANAGEMENT

Global supply chains are growing increasingly complex and fragile due to the climate crisis, the changing regulatory landscape, geopolitical developments, and production risks. This transformation requires companies to proactively, transparently, and responsibly manage not only supply continuity but also environmental and social impacts.

As a global food producer, we are embedding our supply chain management within a comprehensive ESG framework to respond to these changing conditions. In line with the principles of human rights and environmental due diligence (HREDD), responsible sourcing, traceability, and local development, we aim to generate a positive impact across our value chain together with our entire supplier network.

We have a dynamic procurement organization with 6 purchasing offices and more than 35 employees. We work with around 388 primary (Tier-1) raw material and packaging suppliers from 25 countries, including Ghana, Côte d'Ivoire, the Philippines, India, EU member states, and Türkiye. In 2025, our total number of suppliers reached 2,076.



Replacing Imported Soybean Meal with Domestic Alternatives

In line with our strategy to increase the share of local sourcing, we aim to replace imported soybean meal with domestically sourced alternatives through a project carried out together with our R&D team. Launched in 2025, the project is scheduled for completion in 2026.

The main objective of the project is to source this raw material, of which we use approximately 1,000 tons annually, from domestic producers instead of importing it. This transition delivers cost savings across the supply chain while also reducing logistics-related carbon emissions.

pladis GLOBAL SUPPLIER CODE OF CONDUCT

Commitment to ethical principles and sustainability values is among our top priorities in the relationships we build with our suppliers. The pladis Global Supplier Code of Conduct, which is binding on all our suppliers, defines human rights, environmental protection, business ethics, and anti-corruption as mandatory minimum requirements and is embedded into all procurement contracts. The policy clearly sets out the principles we adopt on ESG issues and our expectation of compliance with applicable laws and regulations, covering key ESG areas including environmental protection and biodiversity conservation, respect for human rights, ethical business practices, and the prevention of bribery and corruption. This framework is designed in alignment with the Human Rights and Environmental Due Diligence (HREDD) approach and supports the early identification, monitoring, and remediation of risks.

All of our suppliers are expected not only to comply with the laws and regulations of the countries in which they operate but also to act in accordance with international standards such as the Universal Declaration of Human Rights, the UN Global Compact, the UN Guiding Principles on Business and Human Rights, the International Labour Organization (ILO) Core Conventions, and the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.

The pladis Global Supplier Code of Conduct is embedded into all procurement contracts, making Ülker's high ethical and sustainability standards a contractual requirement. We may impose necessary sanctions on suppliers that seriously or repeatedly breach these standards, including suspension or termination of the contract. Reports of ethical violations can be submitted through our company's official website or via the communication channels specified in the Global Supplier Code of Conduct; all reports are evaluated in line with the principle of confidentiality, and we strictly prohibit any form of retaliation.



To view the pladis Global Supplier Code of Conduct and the principles that our suppliers are required to follow across our entire supply chain, **click here.**

SUPPLIER ESG PROGRAM

We operate our Supplier ESG Program, which aims to improve ESG performance in the supply chain, as a systematic continuous improvement cycle comprising ESG risk screening, independent third-party audits, corrective action plans, and capacity-building activities. This cycle aims to progressively and measurably enhance our suppliers' sustainability maturity.

- **ESG Risk Screening:** We assess all Tier-1 raw material and packaging suppliers based on country-, sector-, and commodity-specific risks, as well as procurement dependency criteria. We conduct an initial desktop analysis through online surveys.
- **Due Diligence:** We conduct independent third-party audits for critical suppliers identified as priorities. We carry out on-site assessments covering human rights, business ethics, and environmental issues.
- **Corrective Action and Improvement:** We develop issue-specific corrective action plans (CAPA) for identified non-compliances; our procurement and sustainability teams provide technical support to suppliers.
- **Capacity Building:** We provide online training, technical guidance, and certification support to enhance our suppliers' ESG capabilities.

For more information about the program, please refer to the **Supplier ESG Program.**



This cyclical approach is fully aligned with the pladis Global Supplier Code of Conduct and is regularly overseen by the Board of Directors. This program, applied to both local and international suppliers, covers a wide range of ESG topics, including waste and emissions management, energy efficiency, biodiversity, human rights, and business ethics.

The Supplier ESG evaluation process starts with desktop analyses initiated through online surveys prepared and evaluated by an independent third-party company and conducted with raw material and packaging suppliers. This evaluation process is complemented by independent third-party audits. On-site audits are carried out primarily for high- and medium-risk suppliers. Based on the evaluation results, in critical cases of non-compliance with the pladis Supplier Code of Conduct, the contracts of the relevant suppliers may be suspended or terminated. For detailed information on the relevant key performance indicators (KPIs), please refer to the **Appendix 8** Supplier Performance Indicators section.



EMEL BİRER

PROCUREMENT DIRECTOR,
ÜLKER BİSKÜVİ

The Supplier ESG Evaluation Program we have implemented has driven a fundamental transformation in supplier selection and audit processes by making environmental and social criteria an integral part of our procurement decisions. With this approach, in supplier selection we consider not only cost and quality, but also resilience, compliance, transparency, and long-term value creation capacity as key criteria. Our initiatives in areas such as preventing child labor, protecting soil health, traceability, and ethical working conditions reduce risks across our supply chain while enabling us to build more reliable supplier relationships. We position responsible sourcing not as a short-term cost factor, but as a strategic investment that supports supply continuity, operational reliability, and brand trust. Considering the increasing regulatory requirements and expectations for responsible sourcing globally, the program we have implemented not only makes our procurement processes more predictable, resilient, and sustainable and strengthens Ülker's value chain, but also helps advance the ESG maturity of the supplier ecosystem in Türkiye and promotes the broader adoption of responsible production standards.

Supplier Selection Criteria

At Ülker, new and prospective suppliers are subjected to the Supplier Preliminary Evaluation process, through which we conduct a limited-scope survey covering environmental and social risks, particularly in areas such as quality, environment, and business ethics. In this process, we consider not only core elements such as price, delivery time, and quality but also ESG performance. For existing critical suppliers, quality, on-time delivery performance, and ESG scores are monitored. According to the methodology set out in the Supplier ESG Program, the ESG score carries a weight of at least 5% in a supplier's final evaluation.

Supplier Screening Process

To manage ESG risks and supply chain dependencies more effectively, we conduct a comprehensive screening process under our Supplier ESG Program. This process considers not only country-, sector-, and commodity-specific risks, but also the level of dependency (business relevance) on the supplier and ESG risks. In determining critical suppliers, factors such as procurement volume, availability of alternatives, and the strategic importance of products to our business are assessed together with ESG evaluations.

As of 2025, our total number of Tier-1 suppliers reached 2,076. Of these, 78 are classified as critical suppliers. No suppliers are classified as critical among Tier-2 suppliers. Expenditure on critical Tier-1 suppliers represents 40.3% of our total procurement volume.

ESG Risk Assessment

We initiate the ESG risk analysis process primarily with Tier-1 raw material and packaging suppliers. This process is conducted in collaboration between the procurement and sustainability teams and is supported by an independent third-party consulting firm. The third-party firm provides technical support to our sustainability team via a software platform that enables data collection and analysis processes.

We assess suppliers across a wide range of areas, including electricity and water consumption, environmental and social certifications, supplier management, greenhouse gas emissions, board structure, workforce size and distribution, business ethics, unionization processes, and occupational health and safety data. This assessment is updated annually, with priorities determined based on supplier screenings. In determining critical suppliers, criteria such as high procurement volume, the strategic importance of the raw material supplied, and the availability of alternatives are assessed together with ESG risks.

Supply Chain Audits

We carry out social and environmental compliance audits to monitor the performance of high-risk suppliers we identify. By 2030, we aim to bring all our critical suppliers into full compliance with the pladis Global Supplier Code of Conduct. In this context, in 2025, we conducted on-site audits of 29 critical suppliers through independent third-party audit firms. Of the audited suppliers, 9 are classified as packaging suppliers and 20 as food suppliers.

In these audits, we comprehensively evaluate issues such as child labor, forced labor, freedom of association, occupational health and safety, disciplinary practices, compensation, discrimination, the conditions of migrant workers, environmental management, and biodiversity under the themes of human rights, business ethics, and the environment.

A. Online Survey

ESG data are gathered through a detailed online survey prepared by an independent third-party audit firm in line with the GRI Sustainability Reporting Standards. We evaluate suppliers against our internal assessment criteria, using the data they provide to assess their maturity in integrating ESG principles into their business.

B. Environmental and Social Compliance Audit

A comprehensive on-site audit covering ESG topics, aligned with the Business Social Compliance Initiative (BSCI) and the Supplier Ethical Data Exchange (SEDEX), is conducted by an independent third-party auditor. This audit assesses suppliers' compliance with the pladis Global Supplier Code of Conduct policy and incorporates Ülker's expectations regarding working conditions, ethical standards, occupational health and safety (OHS), and environmental requirements.

C. Corrective Action Plans

The results from the survey and the environmental and social compliance audits are consolidated to evaluate supplier performance. If the findings reveal potential risks, corrective action plans are issued to the suppliers. Under the Supplier ESG Program, suppliers are granted a specified period to remedy and correct non-compliances. If the non-compliances are not resolved within the allotted time, the business relationship with the supplier is suspended or terminated.

D. Capacity Building

We provide online training, technical guidance, and certification support to enhance our suppliers' ESG capabilities.

Supplier Evaluation Findings

In the audits conducted in 2025, no critical violations such as child labor, forced labor, restriction of freedom of association, discrimination, bribery, or corruption were identified. In the same year, no Tier-1 supplier contracts were terminated under the Supplier ESG Program.

The key data from the evaluation and audit processes carried out during the year	
Number of suppliers classified as critical based on screening results	78
Number of suppliers included in the ESG online survey	276
Total number of critical suppliers evaluated through desk-based assessments (ESG assessment)	33
Total number of critical suppliers evaluated through on-site assessments (Environmental and Social Compliance Audit)	29
Total number of critical suppliers evaluated through desk-based assessments and/or on-site assessments	62
Number of suppliers for which corrective action plans were developed	8

Non-compliances identified through third-party audits and Ülker's internal assessment processes are addressed with corrective action plans provided to suppliers under the Supplier ESG Program. Our procurement and sustainability teams collaborate with independent consulting firms to provide technical support to suppliers and help implement necessary improvements throughout this process. In 2025, improvements were implemented for 138 of the 388 findings identified in evaluations conducted on raw materials, packaging, and critical suppliers.

We commit to developing corrective action plans in direct collaboration with suppliers classified as medium and high ESG risk. In this context, direct support was provided to 8 suppliers in 2025, and guidance was offered for the implementation of necessary actions.

We implement training and capacity-building programs to support our suppliers in continuously improving their environmental, social, and governance performance. In our online training programs, we focus on topics such as the Ülker and pladis Global Supplier Code of Conduct, the Supplier ESG Program, ESG targets, and strategic priorities. As of 2025, the total duration of training activities conducted amounted to 504 person-hours. In 2025, in addition to training covering environmental and social compliance requirements, our suppliers received training on greenhouse gas inventory calculation methods. In addition, 99 person-hours of training on the Supplier ESG Program and related roles were provided to our employees in the Procurement, R&D, and Quality teams.

The training programs planned for 2026 cover a wide range of topics, including ISO environmental and energy management systems, energy and environmental data collection processes, occupational health and safety, risk analysis, labor law, and ethics. These trainings aim to enhance both the legal compliance and sustainability performance of our suppliers.

Technical Capacity Development Program

We focus on strengthening the technical capacities of our suppliers in ESG areas to contribute to the sustainability targets of our supply chain. Accordingly, we support them in proactively preparing for upcoming regulations while encouraging them to integrate sustainability into their growth strategies. We observe that our technical training and guidance provided to suppliers have yielded effective results, particularly in light of new regulations such as the EU Deforestation Regulation (EUDR), the EU Green Deal, and the Packaging and Packaging Waste Directives.

Key initiatives implemented as of 2025:

- We expect our critical Tier-1 suppliers to complete ISO 9001, 14001, 45001, and 50001 certifications by 2030.
- In line with our 2050 Net Zero target, we work closely with our suppliers to reduce CO_2 emissions across our value chain.
- We continue to collect information on environmental data such as Scope 1 and Scope 2 GHG emissions, water withdrawal, wastewater volume, recycled water usage, hazardous and non-hazardous waste, and energy consumption from our critical suppliers, who account for 58.5% of our procurement volume.
- We organized online trainings for our suppliers to define their environmental targets, monitor progress, and improve performance. In these trainings, we provided detailed information on Ülker's sustainability strategy, the Science Based Targets initiative (SBTi) approach, and the 2030 environmental targets.
- Following the training, we requested our suppliers to set targets on greenhouse gas emissions, water consumption, waste reduction, and energy efficiency. We encouraged the setting of these targets throughout the process.
- We continue to collect information on environmental data such as Scope 1 and Scope 2 GHG emissions, water withdrawal, wastewater volume, recycled water usage, hazardous and non-hazardous waste, and energy consumption from our critical suppliers, who account for 58.5% of our procurement volume.

Segment	Current Status	Target and Support
Initial	GHG inventory not yet established.	Basic training, guidance on emissions calculation
Developing	Reports Scope 1 and Scope 2 data.	Scope 2 reduction targets, energy efficiency
Advanced	Reports Scope 1, Scope 2, and Scope 3 data and has set an SBTi-aligned target.	Joint participation in supply chain emissions reduction projects

OPERATIONAL EXCELLENCE

At Ülker Bisküvi, Operational Excellence is a cultural commitment that comes to life not only on the factory floor, but in every process, at every level, and at the heart of every decision. We position this comprehensive approach—spanning from enhancing efficiency to quality assurance, and from strengthening occupational safety to optimizing energy use—as a cornerstone of sustainable growth.

Our targets of **"zero accidents, zero errors, zero losses, zero carbon, 100% service performance, and 100% employee participation"** are put into practice through **"zero error" programs** across our sales, distribution, supply chain, and logistics processes.



At the heart of this journey is the Yıldız Excellence Path (YMY) methodology developed by Yıldız Holding. YMY, which incorporates internationally recognized approaches such as Lean Manufacturing, Total Productive Maintenance (TPM), Total Quality Management (TQM), Six Sigma, and 5S, is implemented in line with targets and roadmaps specific to each facility. Operational Excellence Committees, formed by volunteers from different functions, systematically manage this process, while the central Operational Excellence (OE) unit supports the teams through training, coaching, and consulting.

Operational Excellence Committees, formed by volunteers from different functions, systematically manage this process, while the central Operational Excellence (OE) unit supports the teams through training, coaching, and consulting. By placing individual development and organizational growth on a shared cultural foundation, this approach enables both to progress together and involves new employees in excellence practices from the very beginning. In this way, corporate sustainability is passed on to the next generation through every best practice learned.

To take our Operational Excellence journey to the next level, we launched a transformation process called LIFT (Leader in Future Transformation). Structured around a concept and scope defined in 90-day cycles, the program aims to drive end-to-end digital transformation through training, workshops, and projects, and to redesign all processes in line with customer and consumer value chains.

In 2025, we achieved total savings of TRY 270 million through a total of 2,046 improvement initiatives, including 113 Kaizen (Yıldız Development Teams) projects, 16 End-to-End Value Stream Mapping (VSM) initiatives, 33 work and time studies, and 25 product changeover time optimization initiatives.

The projects implemented within this scope focus on production efficiency, including reducing downtime, shortening production setup and changeover times, increasing facility capacity, and minimizing speed losses and minor stoppages. In addition, reducing raw material, packaging, and other material losses, optimizing inspection and cleaning times, eliminating energy losses, and improving pallet efficiency are among the key focus areas of these projects.

Ülker Bisküvi benchmarks its facilities against one another in terms of the gains achieved and models implemented along the Operational Excellence journey, rewarding best practices and turning them into corporate standards. At each stage of this six-level model, the tasks that facilities are required to complete and the performance criteria they are expected to meet are defined in detail; regular assessments determine each facility's current level, while successful phase transitions are formally recognized. Through inter-facility visits, best practices are reviewed on-site and rapidly disseminated; the knowledge gained through this process is incorporated into handbooks, making it a lasting part of our institutional memory. The "Operational Excellence Handbook," which contains all details of the model, and the "Maintenance Function Handbook," which compiles maintenance standards, serve as key reference guides throughout this journey.

Our Operational Excellence approach translates into tangible gains through various projects spanning production, digitalization, and the supply chain.

- Through Mass Balance-focused Net Loss Yıldız Development Teams (YGT) initiatives, the net loss rate at Ülker Bisküvi Türkiye facilities was reduced by 18% compared with the previous year, reaching 0.57 and generating savings of TRY 49 million.
- At our Topkapı facility, the Wafer 4 Facility was transformed into a fully digitalized and autonomously managed production model through the **"Phase 4 Summit: Journey to Autonomous Excellence"** project. This end-to-end smart facility model, which brings together AI-powered quality control, predictive maintenance, and full digital data visibility under a single framework, has become the reference Phase 4 model for the Topkapı facility, generating TRY 59 million in savings.
- In terms of supply chain efficiency, the **Just-In-Time (JIT)** Operating Model Pilot Project implemented at our Silivri facility, in collaboration with Modern Ambalaj, successfully transitioned from a high-volume ordering model to a pull system driven by the production line's actual needs; while reducing material inventory costs, it also improved space efficiency and occupational safety standards. We plan to roll out this model across all Ülker Bisküvi Türkiye facilities.

Operational Excellence Focus Areas

The key focus areas shaping our Operational Excellence agenda in 2025 are as follows:

- Extending the synergy and success achieved at our facilities through Supply Chain Committees to end-to-end supply chain processes
- Digitalization and process agility
- "Value Stream Mapping" (VSM) initiatives
- "YGP" (Yıldız Development Program) and "OGP" (Operator Development Program)
- Future Integrated Production Model
- COEX (Center of Excellence)
- Hoshin Kanri strategic target deployment system
- Early Equipment Management System

The Future Integrated Production Model, which lies at the heart of these focus areas, is a multidimensional digital transformation program designed to enable real-time evaluation of production through AI-based applications developed in line with technological advances in the industry, transition to paperless reporting, and strengthen operators' autonomous management capabilities. The technical infrastructure initiatives launched at pilot facilities continued to be rolled out across all Ülker Bisküvi facilities in 2025.

DIGITAL TRANSFORMATION AND INDUSTRY 4.0

Digital transformation stands out as a priority area that is inseparable from Ülker Bisküvi's operational excellence strategy. By deeply integrating technology into our production and support processes, we enhance our current efficiency while preparing for future competitive dynamics.

In 2025, we placed AI-based applications at the center of our digital transformation agenda. This year, we translated the digital maturity foundation laid in previous years through the Smart Industry Readiness Index (SIRI) methodology into tangible production gains. The Phase 4 model implemented at the Wafer 4 Facility significantly enhanced the facility's autonomous management capacity by integrating predictive maintenance, AI-supported quality control, and real-time energy monitoring systems under a single digital framework. Meanwhile, under the LIFT program, digitalization was integrated into all process designs as an integral component of the 90-day transformation cycles.

We also took a significant step toward automation in intralogistics. With the deployment of 13 AGVs (Automated Guided Vehicles), the transportation of all packaging materials to the production line was automated. This investment represents an integrated transformation step that reduces occupational safety risks while simultaneously improving operational efficiency and process consistency.

As part of the activities of the P&OD (People & Organizational Development) Committee, digitalization is placed at the center of individual and organizational development. Through on-site assessments conducted at different facilities throughout the year, the activities of both the facilities and the committees are observed first-hand, and strengths and areas for development are shared with all teams. These gatherings also serve as an effective knowledge-sharing and communication platform that enables employees to learn from one another's experiences.

As an important initiative strengthening the human dimension of our digital transformation, the Digital Training Centers were expanded to our Ankara and Karaman facilities following the pilot implementation in Topkapı. Designed to offer a wide range of content, from virtual reality (VR) modules and gamified content to video-based instruction and experiential learning applications, these centers provide a flexible training environment tailored to employees' learning preferences. The instructor-independent content, which can be accessed individually via tablets, is available 24/7. Assessments and evaluations conducted at the end of each training are recorded in the system, ensuring traceability throughout the process. In particular, the VR and gamified content offered on occupational health and safety (OHS) and quality supports lasting learning. The continuous improvement of the program is ensured through regular effectiveness assessments and employee satisfaction surveys. Digital Training Centers enable employees to continue developing their competencies without disrupting the production flow. In this way, we strengthen the foundations of our Operational Excellence approach by investing not only in processes but also in human capital.

Digital Monitoring and Control Systems

To maximize efficiency and quality in our production processes, we are implementing digital monitoring and control systems across several of our facilities.

- **MES System:** We monitor production line efficiency parameters in real time and use the data obtained to manage analysis and action processes aimed at improving line efficiency.
- **Commissioning:** We monitor and analyze plant process data and quality parameters, as well as efficiency indicators for buildings and infrastructure systems, on a centralized platform. This enables us to accelerate decision-making processes and strengthen our predictive maintenance capabilities.
- **Visual Inspection Systems:** Based on the needs of each facility, we use machine learning technology to analyze images of products, semi-finished products, and processes, taking quality control beyond what can be detected by the human eye and minimizing defect rates.



ARTIFICIAL INTELLIGENCE

We embrace artificial intelligence not merely as digitalization or technology integration, but as a strategic business design process through which we fundamentally reshape our organizational capabilities, how we conduct business, and our future competitiveness.

Yıldız Holding AI Strategy

At Ülker Bisküvi, we are part of Yıldız Holding's vision for AI transformation. The Yıldız Holding AI Strategy aims to place artificial intelligence at the core of its business model across a broad range of areas, from FMCG operations to corporate functions and from talent management to governance. The five-year implementation roadmap consists of three main phases, progressing from a pilot phase in which the foundations are laid to full adoption and differentiation within the industry. The AI Center of Excellence and the ethical AI governance framework are among the cornerstones of this strategy.

In this context, we treat data privacy as a priority area of responsibility in AI governance and apply risk-based approaches to protecting user data. We comply with national and international data privacy regulations and integrate innovative privacy-preserving technical methods into our processes. We consider protecting systems against cyberattacks an integral part of our information security management; we identify vulnerabilities that may arise in input and output data and take the necessary measures to ensure system integrity throughout the entire lifecycle.



To ensure fair and unbiased outcomes, we systematically assess potential risks of bias through testing and research processes and implement effective measures to mitigate identified risks. This approach reflects our commitment to ensuring that the outputs generated do not result in discrimination against any individual or group.

As a requirement of our principle of transparency, we ensure that generated content can be identified by users. Accordingly, we ensure that AI-generated content is marked using reliable methods that enable authentication and provenance tracing, while acting in line with national and international regulatory expectations.

To ensure responsible AI governance, access to sensitive AI capabilities is restricted through role-based authorization mechanisms and subject to enhanced oversight. AI models are periodically monitored and validated to detect performance degradation, unintended outcomes, or model drift, with corrective actions implemented where necessary. Employees receive regular training on the ethical, secure, and responsible use of AI technologies. In addition, users and affected stakeholders may request human review and raise concerns regarding AI-supported decisions through established grievance and escalation mechanisms. We also seek to minimize the environmental footprint of AI-enabled technologies by improving computing efficiency and prioritizing energy-efficient digital infrastructure.

We position artificial intelligence as an effective tool for achieving our Environmental, Social, and Governance (ESG) targets and leverage AI-enabled approaches in environmental efficiency, risk management, reporting processes, and supply chain management. We monitor and report the impact of these applications on our ESG performance using measurable indicators.

Bizim Atlas: In-House AI Platform

Developed in-house to translate the use of artificial intelligence into tangible business outcomes, the Atlas platform supports a broad range of applications, from production and supply chain management to energy management and waste monitoring, serving as a practical tool for achieving our ESG targets. By integrating the latest language model capabilities into Atlas, we continuously enhance the platform's analytical and decision-support capabilities.

ENVIRONMENTAL EFFICIENCY

Energy Monitoring: We monitor energy consumption in production processes at the production-line level, down to individual packaged products, through a wireless communication infrastructure; calculate carbon emissions based on real-time consumption data; and develop continuous improvement projects aimed at enhancing energy efficiency. In 2025, we achieved savings of 500,000 kWh of electricity and 19,000 m^3 of natural gas.

BLUE IT Water Monitoring: We monitor our water consumption on an hourly basis, broken down by location and water source, down to the product level; using an anomaly notification system, we immediately identify and address irregularities in consumption. Through this approach, we achieved a 10% reduction in water consumption compared to the 2022 base year.

Waste Monitoring: We identify our waste using barcodes, transport it to waste storage areas using AI-enabled pallet trucks, and track it end-to-end through integration with the SAP system via smart scales. As a result, our waste recycling rate across Ülker Türkiye's factories (finished product and raw material) reached 99.46% in 2025.

Supply Chain Value Stream Mapping: We manage the entire logistics process, from the entry of raw materials into the factory site through to delivery to the consumer, using AI-enabled pallet trucks and online monitoring systems. We monitor route and consumption optimization across our logistics network, as well as fuel consumption, cooling and braking intervals, and driver safety in real time.

SOCIAL IMPACT

Automated Guided Vehicle (AGV) System: With 20 AI-enabled autonomous pallet trucks operating 24/7 across an area of 85,000 m^2, we redeploy 36 employees to higher-value-added tasks, while minimizing occupational accident risks and generating TRY 1,566,150 in monthly savings. We maintain user satisfaction at 85%.

GOVERNANCE AND REPORTING

NOVA Platform: NOVA brings together the digital tools used in R&D processes on a single platform and is continuously enhanced in line with user needs through designated users across all functions. Using AI-supported algorithms, the platform analyzes KPI data on factory operations and converts it into real-time reports, enabling data-driven management decision-making while significantly reducing manual workload. The NOVA Project received an award in the "Digitalization and Artificial Intelligence in Food" category at the 2025 Sustainable Food Awards.

EMPLOYEES

We put people at the core of our business and consider it a top priority to create a workplace where talent can thrive, ideas can be shared freely, and every employee has a voice.

- Equal Opportunity and Diversity
- Talent Management
- Employee Development and Training
- Compensation and Benefits
- Dialogue with Employees
- Occupational Health and Safety



EMPLOYEES

We embrace our "Make Happy, Be Happy" philosophy not only as a promise to our consumers, but also as a core value that guides our relationships with all stakeholders and as an integral part of the responsibility we assume towards our employees, business partners, and the community. With this people-centered approach, we see our employees not merely as a workforce, but as the key drivers of creativity, transformation, and cultural diversity. At a time when artificial intelligence and digitalization are reshaping business processes, generational differences are becoming more pronounced, and talent is becoming our most valuable competitive advantage, creating a work environment where talent can thrive, ideas can be shared freely, and every employee's voice is heard is among our key priorities.

AWARDS RECEIVED IN 2025



Top Employers 2025 Certification

Happy Place to Work 2025 — Excellent Employee Experience Certificate and Award

EQUAL-SALARY Certification

The International Business Awards

- Gold Award: HireUp AI Recruitment Platform
- Bronze Award: HR Department of the Year (Industrial Relations 4.0)

Globee Business & Impact Awards

- Gold Award: Industrial Relations 4.0
- Silver Award: Mentoring Programs (from a DEI Perspective)
- Silver Award: People Dashboard
- Silver Award: bizz@campus
- Silver Award: Yıldızlar Platformu (Blue-Collar Recognition Program)

Stevie Awards for Great Employers

- Gold Award: Employer of the Year (Industrial Relations 4.0)
- Gold Award: Achievement in Employee Relations (Industrial Relations 4.0)
- Gold Award: HR Reporting Solutions (People Dashboard)
- Gold Award: Achievement in Coaching and Mentoring (Mentoring Programs from a DEI Perspective)
- Silver Award: Employee Recognition Solution (Yıldızlar Platformu)
- Silver Award: Achievement in HR Technology (HireUp AI Recruitment Platform)
- Bronze Award: Achievement in Employer Branding (bizz@campus)
- Bronze Award: Achievement in Diversity and Inclusion (Mentoring Programs)
- Bronze Award: Digital Recruitment Solutions (HireUp)

Brandon Hall Group Excellence Awards

- Bronze Award: Diversity, Equity, and Inclusion (HR Bridge)

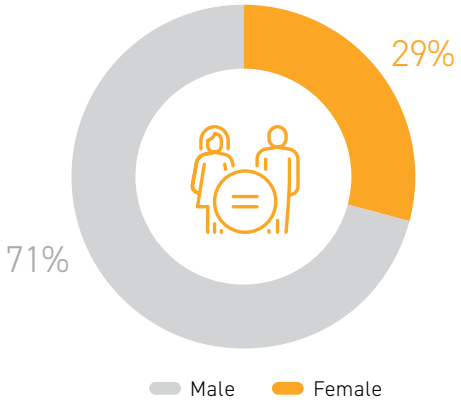
EQUAL OPPORTUNITY AND DIVERSITY

A work environment where differences are valued and everyone has equal opportunities directly impacts both employee satisfaction and corporate success. We embrace the principles of diversity, equity, and inclusion (DEI) as a lasting component of our corporate culture. We put these principles into practice not only at the policy level, but across every process, from recruitment to career development and from mentorship to compensation.

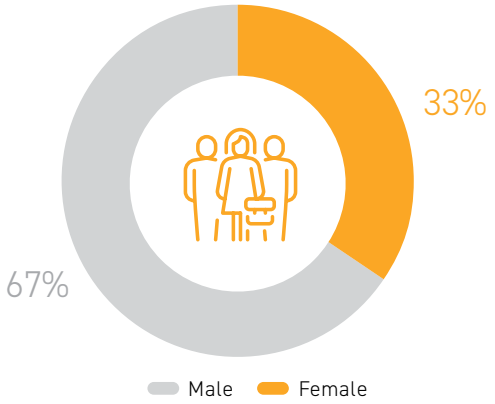
According to the International Labour Organization's (ILO) Employment and Social Trends Report[47], women accounted for only two-fifths of global employment in 2025, indicating that gender inequality in access to employment remains a significant barrier. To support women's participation in the workforce and their effective involvement in decision-making processes, we act in line with the United Nations Women's Empowerment Principles (WEPs) and the G20 Women's Empowerment Manifesto, both of which Yıldız Holding is a signatory to. For the first time in 2022, we reported to the Bloomberg Gender-Equality Index (GEI), and we continue to closely monitor its expectations.

In this context, we aim to raise the share of female employees to 35% and the proportion of women in management positions to 40% by 2030. By the end of 2025, women accounted for 29% of our total workforce, while their representation in senior management reached 33% covering both Türkiye and international operations. The Inclusivity and Diversity Advisory Board, established within pladis, contributes to the implementation of DEI roadmaps on a global scale, and we actively participate in platforms where best practices are shared.

Ülker Türkiye & Raw Material Facilities Employees by Gender



Ülker Türkiye & Raw Material Facilities Senior Management by Gender





EYLEM ÖZGÜR

HUMAN RESOURCES VICE PRESIDENT, ÜLKER BİSKÜVİ

At Ülker, we position diversity, equity, and inclusion not merely as a well-intentioned approach, but as a value-creating force managed through measurement, feedback, and continuous improvement. As of 2025, women account for 41.5% across all management levels and 33% at director level in Türkiye and Raw Material Factories. These figures demonstrate that we have established a balanced leadership pipeline and achieved meaningful representation of women in senior management. We position employee engagement and well-being as a strategic priority and, with this approach, manage our talent management processes—from career discussions to succession planning—alongside our "Good for You" well-being program for our head office, factory, and field employees. Our Top Employers and Happy Place to Work certifications, together with our participation in the EQUAL-SALARY Certification process, demonstrate our commitment to strengthening inclusivity through measurable practices that are open to independent assessment, rather than leaving it merely at the level of discourse.

[47] https://www.ilo.org/publications/flagship-reports/employment-and-social-trends-2026

TALENT MANAGEMENT

In 2025, we carried out our Talent Management Process on the basis of the Leadership Success Model, introduced under pladis, which positions all employees as potential leaders.

- This model, shaped around three pillars—"Set the Agenda," "Do the Right Thing," and "Move Forward Together"—forms the core framework of performance and talent management practices at Ülker Bisküvi.
- The model focuses not only on our employees' work results but also on their behaviors, decision-making styles, and interactions within the team. We adopt a systematic assessment approach to foster individual potential and align it with organizational targets.
- Individual Development Plans are created for all Ülker Türkiye employees in line with the Leadership Success Model. These plans help clearly define both performance and career targets, while supporting employees in developing their strengths and identifying appropriate actions for improvement areas.

Open positions are first communicated to employees through internal postings; in this way, employee engagement is strengthened while ensuring the continuity of internal knowledge. We aim to attract talent to the organization at an early stage through university collaborations, young talent programs, and internship projects.

Internal Promotion

We adopt a structured succession planning approach focused on the development and career advancement of high-potential talent. A total of 158 internal promotions were made during the year.



Performance Evaluation System

To enable our employees to fully realize their potential, we base our performance evaluation process on objective and systematic assessments. We prioritize developing each individual's strengths, identifying development areas based on data, and providing the right training opportunities accordingly.

The Ülker Performance Management System, applied to all our white-collar employees, is conducted in annual cycles and consists of three main stages: target setting, interim assessment, and year-end assessment. This system is built on a culture of mutual dialogue shaped by managers' feedback. The performance cycle begins with cascading the organizational targets set within the Annual Operating Plan (AOP) into individual targets. The employee and manager align on the targets and jointly initiate the process. Throughout the year, targets are regularly monitored and updated through interim assessment meetings. In the year-end assessment, employees present their self-assessments and receive comprehensive performance feedback from their managers. At the end of the process, assessments are reviewed in the calibration step to ensure consistency across the organization. An agile performance management approach, supported by regular coaching discussions between managers and employees throughout the year and real-time feedback mechanisms, also forms an integral part of this process. Within this structure, employees participate in structured performance discussions at least twice a year, while continuing to receive ongoing feedback throughout the year.

The performance system covers not only business results but also individual and organizational development. In this context, our employees are assessed across two main target areas, and individual development actions are planned for the next period. Although our performance assessment system is based on individual targets, it also encompasses team outcomes and collaboration. Employees are assessed across two main target areas—Business Goals and People & Organization Goals. The People & Organization Goals component measures collaboration within teams, inclusivity, and leadership behaviors, linking individual achievement to collective impact. This structure is supported by a multidimensional assessment approach that also incorporates feedback from managers, team members, peers, employees, and stakeholders (e.g., 360-degree feedback).



Our performance assessment system, with its structure that promotes adherence to ethical values, incorporates not only a target-based approach but also a behavior-focused one. When planning our employees' development, we incorporate commitment to ethical principles into the assessment process in line with our "Compete to Win" strategy. Thus, we foster a high-performance culture supported not only by business results but also by behavioral standards.

Young Talents

The future business world requires a workforce that is highly adaptable, creative, and tech-savvy; As part of this transformation, we also aim to be at the forefront of this transformation and envision a future shaped together with young talents. The connections we build with today's students and recent graduates represent an investment not only in the present but also in tomorrow's success. Our professionals and leaders from Human Resources, Production, Quality,

R&D, Sales, and Finance shared their career journeys directly with students. This year, our women leaders took part in prestigious platforms such as Hacettepe Women Signature, ODTÜ Finance Congress, Bilkent Young Academy, Meet WoW Sales, Career Camp Engineering, and Inspiring Women Career Summit.

bizz@kampüs

We have been organizing the bizz@campus competition, where we engage with young talents on university campuses, continuously for 14 years. This competition, specifically designed for undergraduate and graduate students, is held each year under the sponsorship of a different Ülker brand. In this process, where young people develop creative product ideas and communication strategies for the sponsoring brand, we aim not only to open doors for our company but also to offer participants a project experience that becomes an important part of their education.



bizz@campus is designed as a development platform where young people can showcase their creativity and strategic thinking skills while also adding value to their careers. The top three teams in the competition are awarded a monetary prize along with the opportunity to undertake long-term internships in their preferred department. The finalist teams are supported with various development opportunities. In 2025, 1,008 teams and more than 2,500 students from 117 universities and 131 departments applied to the competition; this year, participants competed with ideas developed for the Ülker Caramio brand. One participant from one of the top three teams completed their internship and subsequently joined the company.

Commercial Talent Recruitment Program

Commercial Talent Recruitment Program
The recruitment of young talents and the support of their development are integral to Ülker's human resources practices. In this context, the Commercial Talent Recruitment Program implemented in our commercial functions offers young talents a comprehensive and multifaceted 15-month development journey that guides them in the early stages of their careers. Within the program, participants gain experience in a wide range of areas through rotations, from traditional and modern channel sales to marketing strategies, commercial marketing activities, sales operations, and business development. At the end of this journey, supported by mentorship and specialized training modules, young talents assume their roles in relevant departments according to their competencies and interests.

As part of the Commercial Talent Program, recent graduates embarked on a 15-month rotation-based development journey; role assignments for the program's 2025 graduates were completed in January 2026. In 2025, we engaged with more than 30,000 students across 40 different campus events; university events featuring our women leaders strengthened our employer brand.

Digital Mentorship Program

We regard continuous learning as one of the cornerstones of our corporate culture and continue to reinforce this culture through practices that support individual development. With this understanding, our Digital Mentorship Program, which brings together mentoring, guidance, direction, and inspiration with the possibilities of the digital world, has been providing a strong development platform that fosters internal knowledge sharing since 2021.

The program brings together our employees from different levels, supporting the mutual learning and development journeys of both mentors and mentees. While mentors develop their leadership, guidance, and empathy skills, mentees receive support in areas such as coping with different situations, receiving feedback, and career guidance.

Since the launch of the Digital Mentorship Program, a total of 578 mentees and 320 mentors have been part of this development journey. In 2025, approximately 98 employees benefited from the mentorship program, with the total mentoring time reaching approximately 248 hours.

Digital Reverse Mentorship Program

In the rapidly changing business world, fostering the exchange of knowledge and experience across generations is becoming a critical element of corporate success. We have made the Reverse Mentorship model—going beyond traditional mentoring practices by giving young talents a stronger voice and offering new perspectives to senior leadership—an integral part of our corporate culture.

Launched in 2023, the Digital Reverse Mentorship Program aims to strengthen intergenerational communication and is also a strong reflection of our culture of continuous learning. Structured in line with the outputs of the Talent Management Process (TMP), the program not only supports employees' career development but also enables our leadership team to gain direct insights into the expectations of younger generations, trends in the digital world, and new ways of working. The second cycle of the Digital Reverse Mentorship Program began in 2025 with the participation of 87 mentors and mentees. Aiming to strengthen intergenerational communication and enable our leadership team to gain direct insights into the expectations of younger generations, the program continues to bridge communication gaps across generations and foster a culture of continuous learning and collaboration.

People Analytics

We consider making human resources decisions based on data and insights to be one of the prerequisites for sustainable talent management. We are developing a people analytics approach that covers employee engagement, talent development, turnover rates, and critical role analysis. Through the People Dashboard, we transform HR data on a single platform into meaningful, actionable insights. We use these insights to provide data-driven support for managers' strategic decision-making processes.

Strategic Workforce Planning

At a time when digital transformation, automation, and the climate transition are fundamentally reshaping job roles and competency requirements, anticipating medium- and long-term workforce needs is becoming a strategic imperative. We are developing a strategic workforce planning framework that systematically analyzes the competencies and positions that will be critical over the next three to five years. This framework covers identifying critical roles, anticipating talent gaps, strengthening succession plans, incorporating transformations such as digitalization and the climate transition into workforce planning, and aligning reskilling programs with strategic priorities.

Both our **digital mentorship and reverse mentorship processes** have been designed in alignment with the strategic objectives of our organization. Through these initiatives, we have created a collaborative work environment **by aligning different perspectives within the organization around a common goal.** We have achieved positive outcomes that **add value to the organization by ensuring intergenerational balance,** strengthening employee engagement, retaining talent, and adapting to trends. As of 2025, **11% of our white-collar employees actively participated in our mentorship programs.**



EMPLOYEE DEVELOPMENT AND TRAINING

Investment in human resources is one of the key determinants of organizations' long-term competitiveness. At Ülker, we prioritize continuous learning and development to enable our employees to realize their full potential. Our development programs serve five key objectives: enhancing competencies, strengthening employee engagement, developing leadership potential from within, fostering an innovation culture, and improving operational efficiency.

To proactively manage the impacts of digital transformation and the climate transition on the workforce, reskilling programs in technology, artificial intelligence, and sustainability also form an integral part of this structure. To mitigate potential employment risks arising from the transition to a low-carbon economy as a result of the impacts of climate change, we prioritize programs aimed at enhancing employees' existing skills (upskilling) and equipping them with new skills (reskilling). In particular, by strengthening green skills, we support employees in adapting to the changing labor market. We provide sustainability awareness training to our head office employees through experiential learning rather than theoretical instruction. As part of this approach, which is based on the "70" experiential learning component of the 70-20-10 learning model, we organize hands-on activities such as the Recycling Workshop and Paper Pulp (Papier-Mâché) Workshop. In addition, in 2025, our white-collar employees completed a total of 164 hours of Sustainability training covering Environment, Zero Waste, and Energy, delivered through our e-learning platform, Thrive.



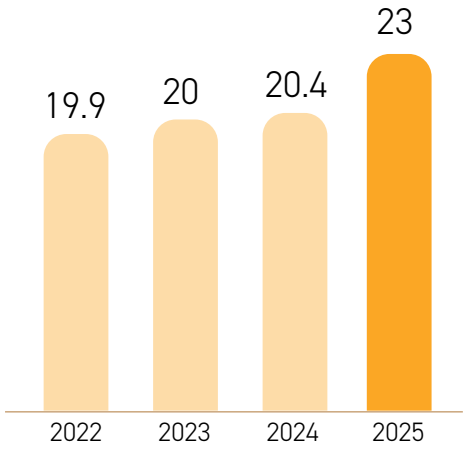
In the short term, we aim to strengthen employees' technical and behavioral competencies in their current roles, raise awareness in critical areas such as digitalization, artificial intelligence, ethics, occupational health and safety (OHS), diversity, equity, and inclusion (DEI), and sustainability, and design leadership development programs specifically for employees at manager and director levels. In the long term, we aim to institutionalize a learning organization culture and provide sustained support for employees' career development by continuously updating our training programs in line with global trends, digital tools, and a focus on sustainability.

With the goal of fostering a culture of continuous learning, we actively use our e-learning platform Thrive. The platform offers access to up-to-date content on a wide range of topics, from leadership, project management, sustainability, agility, and communication skills to expert talks, activities with children, and personal development content.

Throughout 2025, we delivered more than **14,700 hours** of training to our white-collar employees. We allocated **TRY 32.1 million** to the implementation of these training programs. The average training cost per employee amounted to **TRY 6,187.**



TRAINING HOURS PER EMPLOYEE



After each training, we conduct participant satisfaction surveys and foster a culture of peer learning through experience-sharing sessions and follow-up sessions. For the coming period, we plan to prioritize strengthening the measurement infrastructure for linking training and development programs to business results.

The programs span a wide range, from specialized training to management development, from domestic and international conferences to personal development sessions and sustainability-themed seminars. A total of 5,404 hours of training were delivered to 386 employees through leadership development programs, while the average duration of leadership training per employee was 4.4 hours. As part of stress management training, 168 hours of training were provided to employees and 49 hours to managers. Through mentorship programs, 98 employees received approximately 248 hours of mentoring. Cultural awareness training on diversity, equity, and inclusion (DEI) is also an integral part of our development programs. Our employee development programs cover not only full-time employees but also contract employees within our company.

We launched the ODAK (Focus) Project to make digital training tools accessible to our field employees as well. Designed as an autonomous training system, ODAK transforms operator training into a model that employees can access regardless of location, time, or instructor. The system, which creates a corporate memory by recording field information from production lines, standardizes training and enables tracking through real-time reporting. Micro-training videos, prepared with the support of artificial intelligence, enhance visual and auditory learning, while gamification methods make the training process more engaging. In the process measured through level tests, the target KPIs include increasing the proportion of operators with a high level of knowledge, enhancing production efficiency, and improving the utilization rate of Thrive; our e-learning platform.



COMPENSATION AND BENEFITS

In today's increasingly competitive labor market, fair compensation policies play a critical role not only for employees but also for overall social welfare. A fair, transparent, and inclusive compensation system forms the foundation of employee engagement, motivation, and trust. At Ülker, we manage compensation and benefits in a transparent and accountable manner for all our stakeholders, taking into consideration both market conditions and the expectations and needs of our employees.

We structure our compensation approach around a living wage perspective, in alignment with the ILO's decent work principles and the Sustainable Development Goals (SDG 8). To support our employees in achieving a decent standard of living, we review our compensation policies in line with living wage principles. We manage compensation and benefits in a fair and competitive manner, based on the scope and market value of the position, competencies, and performance criteria, and in accordance with applicable legal regulations and company principles. Market data and cost-of-living indicators are taken into consideration when determining compensation, and we ensure and regularly monitor that all employees receive wages above minimum living standards.

We adopt a common compensation policy for all employees across Ülker companies. To ensure the continuity of the principle of "equal pay for equal work," factors such as job description, industry data, market value of the position, and employee potential are evaluated annually in the remuneration process. We regularly monitor for any pay gap between female and male employees in comparable positions.



Our compensation management goes beyond market conditions and job positions alone. It is also directly linked to the company's internal ethical values and standards of conduct. In line with our Ethics Policy, employees who received a warning, suspension, or disciplinary action in the previous year are not taken into account in annual salary reviews. This practice ensures that fair compensation decisions are aligned not only with performance but also with ethical and corporate values. Salary increase decisions are evaluated in connection with the Performance Management process and implemented with the approval of the Business Unit Vice President and the CEO.

Through our flexible benefits portal, which is renewed every June, our white-collar employees can choose from options such as individual retirement insurance, supplementary health insurance, personal accident insurance, medical check-ups, shopping vouchers, and MultiSport membership within their allocated budget. The benefits of our unionized employees are determined within the framework of collective labor agreements, while those of our non-union employees are structured flexibly according to individual needs. We implement supplementary health insurance and social support practices to extend our employees' social protection coverage beyond public programs.

In 2025, we had equal pay approach internationally recognized. Following an independent and transparent audit process, we obtained the **EQUAL-SALARY Certification,** becoming the **first company in Türkiye's snacks sector with more than 5,000 employees to receive this certification.** We completed the statistical analysis, the most critical stage of the process, with a **93.2% success rate** and reported that the average pay of female employees was 1.2% higher than that of male employees. The certification process, which included on-site audits, employee interviews, and focus group meetings at our Çamlıca, Topkapı, and Gebze locations, was successfully completed, with the certification valid for three years.



Our compensation and benefits system is implemented in integration with Human Resources systems in line with the following objectives:

Talent Acquisition and Recruitment: Attracting talents that align with Ülker's vision and values.

Performance Management: Synchronizing Ülker's high-performance culture with employee performance.

Talent and Career Management: Aligning Ülker's succession plans with employee career paths and retaining talent.

Our compensation management is based on the fair, transparent, and systematic administration of all financial rights of our employees in line with applicable legal regulations, Ülker's corporate principles, ethics policy, and Code of Conduct. The compensation management process is conducted in a holistic manner, taking into account employees' education level, professional qualifications, competencies, and performance, as well as market conditions in relation to the scope of the position.

The compensation and benefits of our unionized employees are determined within the framework of collective labor agreements. For our non-union employees, we offer a flexible benefits system that can be tailored to individual needs. Within this system, employees can choose from various options—such as supplementary health insurance for spouses and children, shopping vouchers, medical check-ups, and individual retirement insurance—within their allocated budget. Additional benefits, such as travel assistance and gym memberships, are provided to employees at the managerial level.

Labor Standards and Principles

Maximum working hours and overtime practices are regularly monitored and reported in line with applicable legislation and International Labour Organization (ILO) standards, while overtime is compensated in accordance with applicable legal requirements. To protect our employees' health, safety, and work-life balance, we embrace the prevention of excessive working hours and keeping overtime to a minimum as a fundamental working principle. Accordingly, we manage working hours within maximum limits in line with legal requirements and the ILO's decent work principles, and work to prevent or reduce the need for overtime through workforce planning, shift scheduling, and operational efficiency practices. We regularly monitor actual working hours and overtime practices, analyze compliance with the established maximum limits, and implement the necessary improvement actions.

We encourage employees to make effective use of their annual paid leave entitlements and regularly monitor leave utilization. We safeguard our employees' annual paid leave entitlements in line with applicable legislation and company policies and ensure that payments during leave periods are made in full and on time. Annual leave utilization and payments relating to leave periods are regularly monitored, while compliance with applicable legislation and internal practices is reviewed as part of our human resources processes.

While prioritizing practices that help avoid collective dismissals and support continuity of employment, where such situations are unavoidable, we apply minimum 30-day notice and consultation periods in line with applicable legislation and the principles of



social dialogue, maintain transparent communication with employee representatives and relevant stakeholders, and regularly monitor compliance with these processes. We apply this approach and these requirements not only to our own operations, but also to our suppliers, contractors, and business partners.

Parental Support

Our female employees are entitled to 16 weeks of paid leave (8 weeks before birth and 8 weeks after birth) and may also take an additional 16 weeks of unpaid leave, in accordance with Labor Law No. 4857. Under the milk leave practice for mothers returning to work after childbirth, employees may choose either to finish work one hour early each day or to take one full day off per week. Breastfeeding/lactation rooms are available in all our facilities and at our headquarters. These dedicated areas help employees manage their childcare processes in a healthier and more comfortable way.

Employees who become fathers are granted 5 consecutive days of paid paternity leave during the first week following the birth. In addition, employees may benefit from various leave options to meet the care needs of their children, spouses, partners, or dependents. In this context, the paid leave granted contributes to work-life balance and strengthens organizational engagement.

Childcare Services

Although Ülker does not provide on-site childcare services, we offer support through partnerships with external service providers, including discounted access to childcare centers. Under the Avita Employee Assistance Program, our employees can receive support from professional healthcare advisors to monitor the health and development of their newborn babies. Support for elderly and disability care is also provided under the Avita Employee Assistance Program.

Flexible and Hybrid Work Models

At Ülker, work arrangements are defined under four main categories: office, hybrid, remote, and sales-field models. Our white-collar teams in the hybrid model generally work remotely for 2 days a week and from the office for 3 days. In addition, a flexible working hours model and a part-time work option are offered. With these practices, we aim to promote a more agile, lean, and sustainable way of working, while enhancing employee satisfaction and productivity.

Long-Term Investments in Employees

We offer our employees various ways to create long-term value. We prioritize strengthening our employees' long-term career capital through participation in domestic and international conferences, international development programs, mentorship and coaching support, and career rotation opportunities.

Career Transition Programs

We implement transition programs that include skills development and phased transition arrangements to support employees approaching retirement or whose employment has ended. For employees approaching retirement, we offer gradual workload reduction, mentoring roles, and practices that support mental well-being. To maintain communication with employees who leave the company, we retain suitable profiles in our talent pool and support continued engagement through knowledge sharing, collaboration, and potential partnerships.



DIALOGUE WITH EMPLOYEES



We embrace open communication and mutual dialogue as a fundamental approach to ensure that our employees feel comfortable, happy, and understood in the workplace. During the reporting year, we continued to implement practices that support transparent communication across all functions and locations, enhance interaction among employees, and strengthen the Ülker culture. We share developments relating to working conditions through regular dialogue mechanisms with union representatives and employee representatives. Communication and consultation processes conducted with employee representatives are regularly monitored; their feedback is integrated into decision-making and improvement processes, while the issues discussed, actions taken, and outcomes are tracked as part of human resources and compliance processes.

Employee Engagement Survey: The Employee Engagement Survey, conducted every November, was expanded in 2025 for the first time to include blue-collar employees and the Godiva sales team. A total of 6,258 employees were included in the survey, which achieved an 86% participation rate. The survey assesses areas such as employees' overall satisfaction with their work, their perception that their work is meaningful and serves a purpose, the extent to which they feel happy in the workplace, and their levels of work-related stress. The survey consisted of 43 multiple-choice questions and 2 open-ended questions covering 14 subcategories, including engagement, my work, sustainability, managerial effectiveness, leadership, diversity and inclusion, communication, development, collaboration, operational excellence, safety, and health and well-being. The engagement score reached 89%, its highest level in the past five years. The white-collar employee engagement score increased by 1.7 points compared to the previous year, reaching 87.2.

Manager Effectiveness Survey: Conducted for the second time in October, the Manager Effectiveness Survey was administered to measure leadership performance and guide individual development plans in a data-driven manner. The survey, prepared for 180 managers who had at least three direct reports and had been in their current role for at least six months, was shared with 1,221 employees and achieved an 80% participation rate.

We support employees from different backgrounds in better understanding one another and working more effectively together. To enhance our employees' cultural awareness and inclusive workplace skills, we conduct training programs focused on intercultural communication, diversity, and inclusion. We enhance employee well-being and work-life balance through employee benefits, workplace stress management practices, and sports and health initiatives.

Senin İçin İyi Gelecek (A Good Future for You) program, which aims to support employees' mental and physical well-being, continued across all facilities in 2025 with 50 different activities. As part of the program, we supported the health and well-being needs of approximately 5,000 employees. The program is carried out under four themes: "Recharge Your Energy", comprising psychological self-care sessions; "Stay in Balance", featuring diversity and collaboration workshops; "Stay Fit", comprising health seminars; and "Be Inspired", featuring interactive career sessions.



A Short Break with Breakfast: Through the A Short Break with Breakfast event, we collaboratively enhance our ways of working and standards, creating a better work environment through the power of team spirit and shared knowledge. This platform, where our employees within the scope can directly share their feedback, requests, and expectations with leaders, continued regularly across all locations in 2025. In Karaman, 225 suggestions were collected across 22 breakfast sessions, with the suggestion implementation rate reaching 99%. In Topkapı, 152 of the 177 suggestions collected across 11 breakfast sessions were implemented. In Ankara, 146 suggestions were submitted across 11 breakfast sessions.

Instant Reward: Through the "Instant Reward" system, which we promptly recognize our out-of-scope employees for their successful contributions to Ülker and high performance, we strengthen the culture of appreciation. The rewards in this system may be financial or non-financial and can take the form of written or verbal appreciation. This approach boosts employee motivation while reinforcing a culture of timely feedback and recognition. The Instant Reward program was digitalized in 2025 and integrated into the One+ system. This transformation made reward processes faster, more transparent, and more accessible, while also supporting the broader sharing of success stories across the organization. In 2025, 404 employees from the quality, occupational health and safety, production, and maintenance teams received rewards.

Akıl Küpü (Mind Cube) is a digital suggestion system where our employees within the scope can share their ideas on productivity, process improvement, product development, occupational safety, and savings. Every suggestion is evaluated by expert teams, and those implemented are rewarded. In 2025, a total of 8,296 ideas were submitted to the system, which was actively used across all locations; 1,853 of these—representing 22%—were implemented. Additionally, 3,878 of these ideas were directly related to sustainability. In 2025, the system was digitalized at the Gebze, Önem Topkapı and Giresun raw material locations, enabling faster feedback to employees.

P&OD (People & Organization Development) Committee: As part of the Operational Excellence initiatives carried out at our facilities plays an active role. Through on-site assessments conducted at various facilities throughout the year, the activities of both the facilities and the committees are observed first-hand, and strengths and development areas are shared with all teams. These gatherings also serve as an effective knowledge-sharing and communication platform, enabling employees to learn from one another's experiences.

Star of the Month: Through the "Stars of the Month" program, teams that achieve the highest performance based on established criteria are recognized as the "Star of the Month" each month. Teams from departments such as quality, occupational health and safety, production, and maintenance are recognized in special ceremonies attended by all employees and managers. This initiative aims to highlight achievements, promote a culture of appreciation, and enhance team motivation.

Stars of the Year: As part of "Stars of the Year" program, we take part each year in the "Stars of the Year" competition organized by Yıldız Holding. Open to all employees, this competition encourages the emergence of creative and effective ideas in categories such as GOYA, Zero Errors, Common Purpose, Leadership, Contribution to Growth, Innovation, Cost Advantage, Digital Leadership, and Occupational Safety. The competition promotes the sharing of best practices across companies and rewards teamwork. During the previous reporting period, a breakfast event was organized for the 46-member Stars of the Year team.

CORPORATE NEWSLETTERS AND COMMUNICATION PRACTICES

- **"Aklınla 1000 Yaşa" Newsletter** is a comprehensive internal communication tool that showcases events, training programs, employer branding initiatives, and best practices. Thanks to this newsletter, employees across different locations and functions have the opportunity to stay informed about organizational developments and each other's priorities.
- **"Biz Bize" Meetings** provide employees with direct information on the company's current status and priorities through quarterly sessions held by our CEO, Özgür Kölükfakı.
- **"Biz Bize" Factories** event is held at production sites every quarter. The event begins with breakfast, fostering direct contact with leaders and enabling transparent communication with managers. The event features rich content such as "Surprise Session," "Us at Work," "News from Us," "One of Us," "Q&A," and "Kahoot." In the "One of Us" session, the organization's youngest and most experienced employees come together to share perspectives from different generations.
- **Leaders' Bulletin** is prepared exclusively for managers and features current and inspiring content on leadership, personal development, arts & culture, and the economy. In 2025, 11 issues of the Leaders' Bulletin were published; content covering leadership, psychological safety, team management, and self-awareness was shared in both Turkish and English via the Thrive platform.
- **Operational Excellence (OE) Bulletin** compiles quality, occupational health and safety, environment, energy, and sustainability practices from production sites on a quarterly basis and shares them with all site employees and senior management.

ENGAGEMENT WITH LEADERS AND INSPIRING GATHERINGS

- **Talks with Leaders,** face-to-face sessions for white-collar employees where our senior executives (e.g., CFOs and General Managers) share their career journeys, continued in 2025. These sessions continued to make leaders more accessible while serving as a source of inspiration for employees.
- **CEO Coffee Talks** is the CEO's special edition of Talks with Leaders. It offers the opportunity to engage one-on-one with our CEO, gain insights into the corporate agenda, and receive direct answers to questions.
- **CEO Townhall Meetings** held quarterly, bringing us together with all our employees across Türkiye and Central Asia. Broadcast live from the Çamlıca office, these meetings provide a transparent dialogue environment where reviews of the previous period, plans for the upcoming period, and the company agenda are shared.



TEAM- AND NETWORK-BASED LEARNING ACTIVITIES

The various employee resource groups established within the organization bring employees together around shared interests and needs, contributing to fostering an inclusive workplace culture.

- The CrossXperience program strengthened cross-functional learning and collaboration; the first implementation, involving approximately 40 employees from the Marketing and Category teams, achieved an 89% satisfaction rate.
- Development Workshop is an event where employees with specific interests share their knowledge and skills with colleagues. For example, an employee experienced in baking may host a pide-making workshop (Turkish flatbread) on a designated day. The prepared pide is evaluated by a jury, and the winners are awarded. Thus, knowledge sharing and social interaction are encouraged.
- Buddy Program is a system in which a volunteer mentor supports new employees in learning processes more quickly and effectively. The program supports employee engagement, adaptation, collaboration, and integration into the corporate culture. As of 2025, 51 Buddies have taken on roles at the Gebze Factory, with a total of 183 employees benefiting from the program.

ACTIVITIES THAT STRENGHTEN COMMUNITY SPIRIT AND CORPORATE CULTURE

- Ülker Family Picnic is organized annually with the participation of blue-collar employees and their families. In addition to breakfast and lunch, various activities are offered for children and adults.
- Iftar Programs are organized in all factories during the month of Ramadan, bringing employees together.
- Holiday Gatherings are organized in factories during Ramadan and Eid al-Adha, where all employees share in the joy of the celebrations.
- Welcome Summer and Welcome Winter events are organized to celebrate seasonal transitions and boost employee motivation.
- Tournaments include volleyball and football competitions in which employees participate with self-formed teams. Winning teams are rewarded with trophies and prizes.
- Monthly Birthday Celebrations foster a sense of individual value and belonging by celebrating employees' birthdays together.
- Cultural Tours create a social setting outside of work by enabling employees to visit historical and cultural sites in their surroundings with a guide, while also enriching cultural knowledge.



SOCIAL RESPONSIBILITY-FOCUSED PRACTICES

- As part of April 23 National Sovereignty and Children's Day, we host employees' children in our facilities. They get to know their parents' work environments through production tours and gain awareness while having fun in water-themed painting workshops.
- On Mother's Day and Father's Day, we host employees' parents in the facilities. Tours are organized in production areas, and memories are captured with photos taken in photo booth corners.
- As part of the International Day of Persons with Disabilities, our senior executives meet with employees with disabilities over breakfast or lunch. Requests are heard directly, and our corporate support is conveyed through the presentation of special gifts.

OCCUPATIONAL HEALTH AND SAFETY

At Ülker, we regard occupational health and safety (OHS) as an indispensable element of all our operations. We place the principle that "nothing is more important than the health of our employees" at the heart of our corporate culture, embracing it not merely as a statement but as a commitment that guides all our processes.

Our Occupational Health and Safety Boards, each comprising six members at our facilities, convene every three months in compliance with legal regulations. In addition, our OHS Committees, which meet once or twice a month, regularly monitor OHS processes and evaluate areas for improvement. All our employees are represented through these committees.

The core elements of our OHS management system include regular risk assessments, provision of personal protective equipment, emergency preparedness, health management, regulatory compliance monitoring, contractor and visitor safety management, internal audits, and independent external audits carried out within the scope of ISO 45001 certification. As part of our internal audits, we regularly conduct GOYA[48] (Gemba On Your Area) audits together with our Corporate OHS team and facility OHS specialists. Upon returning to their respective facilities, the audit teams share their learnings with the management teams, enabling best practices to be disseminated across all locations. GOYA audits contribute to identifying areas for improvement and strengthening our corporate culture, while also playing a critical role in preventing workplace accidents. Findings and actions arising from the audits are incorporated into each facility's business plan and monitored accordingly.



İSA YILMAZ
OHS AND PROJECT MANAGER, ÜLKER BİSKÜVİ

At Ülker, the decrease in our LTAR (Lost Time Accident Rate) to 0.54 in 2025, representing a 13% improvement compared to the previous year, is the result not only of technical measures, but also of a strong cultural transformation. We build this culture through the Area Responsibility model and simultaneously enhance awareness and performance through Occupational Health and Safety Week, breakfast meetings, and the inter-factory "OHS Award of the Year" program. In our highest-risk operational areas, we implement a multi-layered action plan through comprehensive risk analyses, standardized work processes, and behavior-focused safety observations. We regularly measure the effectiveness of these actions using behavioral data obtained from near-miss reports, employee engagement surveys, and on-site observations. As we move toward our 2030 target of 0.35, we continue to deepen our cultural transformation, apply data-driven risk prioritization, take our self-control system to the highest level, and advance with a zero-tolerance approach.



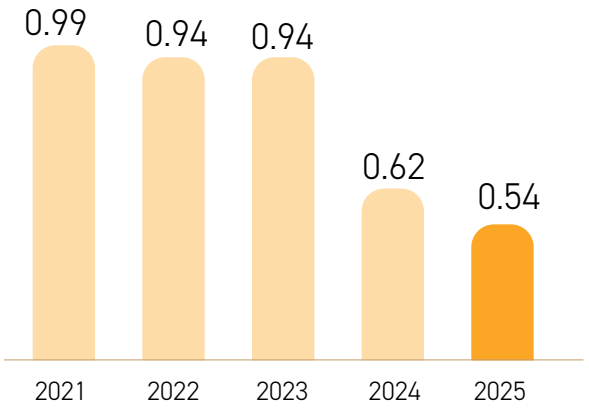
[48]A method that encourages employees to observe their daily work areas, identify problems, and generate solutions.

We shape our approach to occupational health and safety around the goal of a **"Zero Accident Journey."** We reinforce risk and action management through engineering solutions, robust preventive systems, and comprehensive on-site audits. Through the behavior focused OHS culture we have embraced, we aim for a transformation built not only on rules but also on safe behavior.

We monitor our progress in reducing health risks against our 2030 Lost Time Accident Frequency Rate (LTAR) target of 0.35. Thanks to cultural development, engineering efforts, and improvements in technical barriers, we have managed to keep our LTAR below 1 for the past five years. In 2025, our LTAR decreased to 0.54, representing a 13% improvement compared to the previous year.

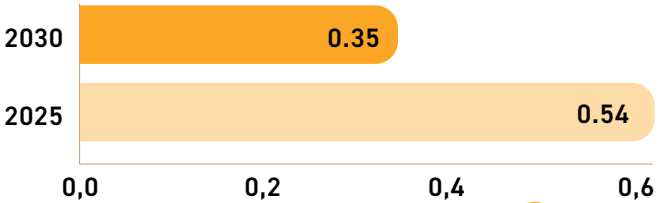
Accident Frequency Rate - LTAR

(Lost Time Accident Rate)



LTAR: Progress Toward the 2030 Target

Accident Frequency Rate





In 2025, our OHS efforts were recognized with numerous awards on international platforms:

- Best Business Awards – Health & Safety Award
- Globee Business Awards – Achievement in Process Improvement (Silver)
- Globee Innovation Awards – Environment, Health and Safety (EHS) Program of the Year | Europe, Middle East and Africa (Silver)
- Stevie International Business Awards 2025
  - *Achievement in Health and Safety Excellence (Silver)*
  - *Health, Safety & Environment Program of the Year – in Europe (Gold)*
  - *Achievement in Organization Recovery (Gold)*
  - *Governance, Risk & Compliance Solution (Gold)*
- TITAN Business Awards – Health, Safety & Environmental Program of the Year (Gold)

We conduct Occupational Health and Safety processes under the following headings:

- **Management:** The management of OHS processes is overseen by our senior executives, including the Vice President of Operational Excellence, HSE&E, Quality, and Sustainability, who is also a member of the Ülker Sustainability Platform.
- **Reporting:** The Vice President of Operational Excellence – Health, Safety, Energy, Environment, Quality, and Sustainability, who is responsible for OHS, reports directly to the CEO of Ülker.
- **Representation:** All employees are represented through OHS boards, OHS committees, and employee representatives.
- **Risk Assessment:** At our production facilities, we take necessary measures to prevent workplace accidents through proactive risk assessments and work toward our goal of zero accidents at the workplace.
- **Analysis:** By examining the causes of workplace accidents, we inform our employees to foster safe behavior and a safe working environment.
- **Improvement:** The OHS team develops projects to improve identified risk points by conducting internal audits in the production facilities.

We manage all our facilities under the ISO 45001 Occupational Health and Safety Management System. As of 2025, nine of our facilities are ISO 45001 certified, including the Kazakhstan facility, which was added to the scope in 2025.

Employee Health

We continuously improve our processes to protect and promote employee health, while ensuring full compliance with occupational health and safety regulations. We regularly monitor employees' health through pre-employment, periodic, and reassignment examinations, minimizing risks through early diagnosis and referrals. We carry out occupational hygiene measurements, on-site observations, and risk analyses to prevent occupational diseases, while also monitoring thermal comfort. We make special monitoring and work arrangements for employees in sensitive groups and provide part-time dietitian and psychologist support at all our locations.

Occupational Health and Safety (OHS) Risk Assessments

We conduct activity, machine, chemical, and ergonomics-based risk assessments with the participation of both our in-scope and out-of-scope employees to identify situations that could threaten employee health in advance and to prevent potential health issues. At our production facilities, environmental and OHS risk analyses are periodically updated in line with the ISO 14001 and ISO 45001 management systems. Action plans developed based on identified risks are managed in an integrated manner with performance targets extending from plant directors to foremen.

At our production facilities, we conduct ergonomic risk analyses using the Lumbar Motion Monitor (LMM) method, considering factors such as repetitive tasks, heavy load handling, and non-ergonomic working positions. Based on these analyses, we take preventive actions such as providing equipment support and implementing task rotations. The vacuum lifting systems, chain hoists, and battery-operated machinery integrated into our production facilities play a crucial role in reducing ergonomic risks associated with heavy load handling.



As part of our continuous improvement approach to technical safety, we have conducted machine-based risk assessments with independent third-party consultants over the past six years. In 2025, 35 occupational safety leaders actively took part in the audit processes carried out in the production facilities and warehouses of pladis Türkiye.

In 2025, our pladis Kazakhstan facility received ISO 45001 Occupational Health & Safety certification.



Root Cause Analysis

Following a workplace accident, the incident site is secured by the leader responsible for the area to prevent another accident from occurring. The designated root cause analysis team conducts an on-site investigation; physical conditions, equipment status, and work processes are observed first-hand, and one-on-one interviews are conducted with employees involved in the incident. Based on the data collected, the "5 Why Analysis" methodology is used to identify root causes by examining not only immediate causes but also organizational and systemic factors. Corrective and preventive actions identified as a result of the analysis are assigned

to the relevant persons responsible, with due dates set and progress monitored accordingly. The results are shared with managers and employees, while the prepared OHS Bulletin is also shared with other locations to disseminate preventive measures.

Emergency Preparedness

We regularly conduct training and drills to enhance our level of emergency preparedness. We keep all necessary emergency equipment ready in our facilities and carry out regular periodic inspections of this equipment. The emergency response containers located at each plant contain equipment such as portable generators, hydraulic equipment, concrete cutters, angle grinders, personal protective equipment (PPE), stretchers, and first-aid cabinets; regular maintenance and inspections of this equipment are carried out.

Fire protection systems are installed in accordance with national and international regulations, including the fire safety standards of the U.S.-based NFPA (National Fire Protection Association), European EN (European Norm) technical standards, and FM (Factory Mutual) insurance and risk engineering standards; periodic inspections and maintenance are carried out by accredited organizations.

Since Türkiye is located in a high earthquake risk zone, we implement specific explosion protection measures for each plant, ensuring that all our facilities are prepared for this risk. Earthquake-related structural and ground survey analyses are conducted at our plants, and reinforcement works are carried out where necessary. To ensure uninterrupted communication between the Holding and our plants in emergencies, ADİS (Emergency Communication System) has been established, and satellite phones are also actively used at our plants. The training and staffing levels of emergency response teams are kept up to date at all times.

OHS Culture

We recognize that ensuring occupational health and safety (OHS) at the highest level across all our facilities and offices is only possible through collaboration with our employees. Accordingly, we conduct regular training programs and awareness-raising activities to achieve our goal of "zero workplace accidents."

During 2025, **Ülker employees received a total of 70,656** hours of OHS training. In addition, **contractor employees received 68,916 hours of OHS training.**



As part of the "OHS Ambassador" system, which we implemented to transform the OHS culture into behavior, we use a behavior-focused occupational safety system.

- Employees evaluate each other's behaviors in terms of occupational health and safety.
- Thank-you cards are filled out for safe behaviors, while reminder cards are issued for risky behaviors.
- Notifications are analyzed by the OHS department, and the employees who contribute the most are recognized with monthly awards.

Through the **"Behavior-Based Occupational Safety"** project, we aim to strengthen the feedback **culture and identify potential** risks before accidents occur. Through focus group discussions conducted with sociologists, psychologists, and technical specialists, our employees' perception of occupational health and safety is analyzed and the safety culture is assessed.

As part of the **"Area Responsibility Project,"** designated employees from each area identify and monitor the OHS actions within their areas of responsibility. This ensures a safe working environment in the field.

OHS Skills Matrix

As part of the "Operator Development Program," we use the OHS Skills Matrix to identify areas for improvement in our operators' and employees' knowledge and skills and prepare training plans tailored to specific needs. The aim is to raise employees' awareness of OHS through targeted training addressing low-scoring areas.

Digitalization and OHS

We use multiple digital platforms in an integrated manner to manage our OHS processes more effectively and minimize process-related risks.

SafeUp Digital Platform: We manage interactive OHS training compliant with regulatory requirements, incident reporting, corrective action tracking, and reporting functions through a single platform. Nine modules, including OHS, health, and training modules, have been integrated into the platform, strengthening its reporting and traceability capabilities.

You can access our **OHS Policy here.**



As a result of the actions we implemented in response to the findings identified under OHS throughout 2025, we achieved a 90% completion rate.

- To raise OHS awareness, we hold regular meetings with employees through union representatives and receive their suggestions.
- We strengthen communication on OHS through theater performances, competitions, and on-site walks.
- Every two weeks, we support the well-being of our employees through psychologists and dietitians hosted at our facilities.
- OHS suggestions and improvements are rewarded instantly.

OHS KPI Dashboard – Power BI: With this project launched in 2025, OHS Performance Metrics from pladis Türkiye's production facilities can now be monitored digitally on a monthly and annual basis. The platform supports real-time monitoring, data integrity, and rapid root cause analysis, while also enabling benchmarking across facilities.

Visitpro – Contractor and Visitor Management System: To strengthen the OHS culture across our entire value chain, we manage contractor companies' documentation and training through this system. In 2025, comprehensive OHS training continued to be provided to visitors and contractor employees via Visitpro. In 2025, we provided 2,102 hours of training to 11,452 visitors via Visitpro and 2,920 hours of training to 3,475 contractor employees.

OHS in the Supply Chain

We also prioritize compliance with occupational health and safety standards in our supply chain. We incorporate OHS criteria into all supply contracts and monitor their implementation. In this context, the Global Supplier Code of Conduct, which also includes OHS requirements, serves as a binding framework for all suppliers, with the relevant provisions incorporated into every supplier contract. This ensures compliance with OHS standards and the traceability of responsibilities throughout the supply chain. In machinery and equipment procurement, we carry out on-site inspections and compliance audits against specifications as part of our early equipment management system. We reconsider our business relationships with suppliers who have low safety scores.

COMMUNITY

Guided by our commitment to creating positive social impact, we manage balanced nutrition, innovation, responsible marketing, and strong customer relationships as interconnected elements that reinforce one another.

- Well-Being and Balanced Nutrition
- Innovation Culture
- Responsible Marketing
- Customer Relations Management
- Corporate Social Responsibility



COMMUNITY

For consumers, holistic well-being, transparency, and social responsibility have become integral to brand choice. As the global food industry navigates this transformation, at Ülker we go beyond keeping pace with change; we shape our business practices in line with consumers' expectations and need, while shaping the future of consumers today. With our social contribution approach that places the well-being, needs, and quality of life of our stakeholders at the center, we manage balanced nutrition, innovation, responsible marketing, and strong customer relationships as an interconnected whole.

WELL-BEING AND BALANCED NUTRITION

A balanced and healthy life is important not only for individual health but also for community well-being and sustainable development; growing awareness further strengthens this area through more conscious choices. At Ülker, we respond to these changing expectations by offering product alternatives that maintain taste, provide high nutritional value, and support portion control.

We diversify our products with an innovative approach to meet different dietary needs and preferences. Accordingly, we shape our product development roadmap by considering consumer feedback, scientific data, and current nutrition trends. We continue to focus on three main areas: enhancing the nutritional value of our products, facilitating portion control, and reducing sugar, salt, and fat content.

Nutritional value: Strengthening the nutritional profile of our products remains an ongoing priority on our R&D agenda. Accordingly, our R&D efforts are carried out through a multifaceted approach that includes vitamin and mineral fortification and increasing protein and fiber content. To enhance the nutritional value of our products, we make use of whole grains, fiber, and functional food ingredients. In 2025, we added Altınbaşak Taco Flavored & Quinoa Snack to our portfolio, offering consumers another baked, high-fiber option. Containing quinoa, this product stands out as a tangible reflection of our product development approach that supports balanced nutrition goals. In the protein category, we added a peanut bar with 20% protein content to our portfolio under the Go Ahead brand.



At Ülker, **we use the pladis Global Nutrition Model as our corporate nutrient profiling framework to assess the nutritional composition of our existing and new product portfolio.** While taking into account levels of sugar, saturated fat, and sodium, we work to **improve the scores of products in our portfolio** by increasing levels of fiber, whole grains, and protein. In new product development processes, **each launch is assessed from the outset against these criteria.**



Portion control: We continue to offer our consumers a range of product options with different calorie values and sizes to support portion control. In 2025, we launched 8 Kek Orman Meyveli Mini, expanding our range of alternatives that facilitate portion control. With their small and convenient formats, our mini product range continues to support conscious consumption habits while contributing to both well-being choices and an enjoyable consumption experience.

Reducing sugar, salt, and fat content: Progress in reducing sugar, salt, and fat continues to be one of the industry's most complex challenges, given the need to balance these efforts with consumers' taste expectations. In every reformulation project, our R&D teams work on scalable solutions that improve nutritional profiles without compromising the taste experience. In 2025, through our no-added-sugar product launches, we helped our consumers consume 278 tons less sugar. We continue our efforts toward our target of reducing 50 tons of salt, 1,000 tons of fat, and 3,000 tons of sugar across all product categories by 2030. In addition, we introduced a no added sugar version of Probis to our consumers. With this launch, we made one of our popular products available to consumers who prefer no added sugar options.

Ülker Bebe Milk Biscuit, containing 12 vitamins and 7 minerals, has long been a part of our product portfolio with its formula enriched with calcium, iron, and vitamins C and D, as well as being free from trans fats.

Share of Products with Reduced Sugar, Fat, and Salt in Revenue	1%
Share of Products with High Nutritional Value in Revenue	4%
Share of Reformulated Products by Nutritional Attributes in Revenue	1%

*All values in the table are valid for the 2025 contribution.



PELİN GÜNENÇ
R&D DIRECTOR, ÜLKER BİSKÜVİ

We keep consumer expectations at the center of our product development processes and, in response to the growing trend toward holistic wellness and balanced living, design a wide range of new products that meet consumer demand for reduced-sugar or fiber-rich alternatives whose sugar comes from fruit, without compromising taste. Probis No Added Sugar, developed in 2025, is a tangible example of this approach, offering consumers a new alternative to one of our popular products and receiving a positive response from the market. We design our new products in line with the pladis Global Nutrition Model. In addition to offering sugar-free or no added sugar versions of our existing products, we continue to expand our lower-sugar alternatives by developing products whose sugar comes from fruit under next-generation brands such as Go Ahead, while also growing our range of high-fiber or high-protein products.



Fortification of Wheat and Wheat Products with Zinc and Selenium (Biofortification)

Wheat accounts for 38% of our key raw materials and represents the largest share among them. Accordingly, regular wheat sourcing is one of our top priorities, and we invest in projects aimed at ensuring the continuity of wheat varieties suitable for biscuit production.

The Biofortification Project, conducted in collaboration with Sabancı University, has yielded tangible results in our efforts to increase the zinc and selenium content of wheat in Türkiye. In the second phase of the project, applications carried out across a 90-decare area in Kırıkkale, together with data obtained from biofortified whole wheat flour processed at Ülker facilities, revealed striking results: the zinc content in wheat increased by 55%, while the selenium level was raised 28-fold; in the biofortified whole wheat flour produced at our facility, zinc content was measured to be 46% higher and selenium content 18 times greater than in non-biofortified flour. These scientific findings were brought to consumers in 2025 with the launch of the Field-Enriched Cereal Biscuit with Milk Chocolate, Puffed Rice, Orange, and Coconut, developed under the Saklıköy brand. Initially launched in limited quantities, this product represents an important milestone demonstrating the industrial-scale applicability of biofortification.



INNOVATION CULTURE

Innovation is one of the cornerstones of Ülker's corporate culture. Driven by our motivation to "offer the best first," we aim not only to meet consumer expectations but also to reduce our environmental impact and increase social benefit. This approach, which places consumer insights at the outset of our processes, integrates knowledge through university and technology collaborations, and designs every innovation project in alignment with sustainability targets, reached a new level of maturity in 2025, backed by an investment of TRY 495.5 million. In the past six years, we have brought more than 250 new products to market. As of 2025, our new products represent approximately 14% of our total domestic revenue. Each year, we launch an average of 55 new products for our consumers in the Turkish market.

The Ülker Bisküvi R&D organization manages the entire process—from ideation to consumer testing, and from production line trials to shelf-life analyses—across the biscuit, cracker, wafer, cake, chocolate, and coated bar categories. Two R&D centers certified by the Ministry of Industry and Technology are at the heart of these activities: While the Gebze Bakery Products R&D Center operates across the biscuit, cracker, wafer, and cake categories, the Topkapı Chocolate R&D Center specializes in chocolate, cocoa, wafers, and coated bars. In 2025, more than 80 comprehensive consumer tests were conducted, over 200 quality improvement projects were implemented, and 264 export projects contributed to growth in global markets.

Through the R&D Development Program, we conducted a total of 31 different trainings in 2025. To spread the corporate innovation culture across the organization, we organize trainings, interactive sessions, and various initiatives for our employees throughout the year: We systematically support our teams' participation in domestic and international fairs, seminars, and conferences.

R&D Development Program: It is a continuous program offering various trainings with the contribution of expert academics and industry professionals to enhance the technical competence of R&D employees and strengthen their personal and professional development skills. The R&D Development Program adopts the 70:20:10[49] model, supporting learning not only through classroom training but also through workplace experience and social interaction.

R&D Innovation Groups: These groups, established to foster synergy among different R&D teams, aim to develop product ideas and prototypes that align with pladis priorities and address market opportunities.

R&D Technology Roadmap: It covers the processes of identifying and implementing research projects that support our sustainability targets.

R&D Library: Through the "pladis Türkiye R&D Library" (Library for pladis R&D TR Hub), accessible to R&D employees, teams can access articles related to their fields, patent reports, news summaries of innovation studies, updates from scientific research, and announcements of conferences, webinars, and trainings that support the development of their technical competencies.

Collaborations: Investments in R&D and innovation in agriculture and food safety form one of the cornerstones of the transition to sustainable food systems. In this transformation, not only technology but also collaborations and systemic perspectives play a critical role. The future of sustainable agriculture is shaped by multifaceted



partnerships that bring together different stakeholders. This approach supports greater efficiency while reducing food losses and environmental impacts.

Interaction with Start-ups and the Supplier Ecosystem: Start-ups are monitored through horizon scanning, and collaboration processes are initiated with ventures that align with our needs. Licensing processes are evaluated for technologies with commercialization potential. R&D projects based on unique content and innovative inputs are developed in collaboration with suppliers.

[49] It is a learning and development approach which suggests that 70% of an individual's development occurs through on-the-job experiences, 20% through interactions with and feedback from others, and 10% through formal training and learning programs.

To accelerate the transformation of food systems, we monitor current developments in science and technology and identify potential partners for open innovation initiatives:

- Our R&D centers conduct scientific research projects that create value for the company's activities and the sector, in collaboration with universities in Türkiye and abroad, TÜBİTAK, and other research centers.
- As part of university–industry collaboration, we maintain active collaborations with 11 national and 5 international universities and research centers, while technical evaluations were conducted with 10 different start-ups based in Türkiye and Europe.
- Through our membership in the Türkiye Food Innovation Platform (TÜGİP) and active participation in the Food Innovation Cluster Executive Committee, coordinated by Marmara Teknokent, we aim to develop innovative, environmentally friendly, and sustainable solutions for the food sector, while strengthening collaboration with SMEs and enhancing their competitiveness through R&D, digitalization, workforce development, and international networks.
- Under the TÜBİTAK-supported **Artificial Intelligence-Based Functional Food Design** project, a language model based on scientific literature was developed in collaboration with Dynamis Bio and Istanbul Technical University (ITU).
- **Under Horizon Europe – BluePartnership,** innovative food applications using post-harvest fish losses are being explored; within the consortium, which also includes Tetis Biotechnology and Koç University, work is ongoing on the sustainable production of collagen using green technologies.
- Through the **PROTWIN** project, we contribute to the international scientific network in the field of alternative protein sources under the coordination of TÜBİTAK.
- **The Biscuit Wheat Development Program** has been extended for another five years in collaboration with the Bahri Dağdaş International Agricultural Research Institute; field and laboratory studies are being conducted to identify the wheat varieties best suited to biscuit production.

Key Product Innovations in 2025

Ülker's R&D efforts are not limited to new product development; they also encompass improving the nutritional profile of our products. The key product innovations of 2025 offer tangible examples of this approach:

- In response to the growing "holistic wellness" trend, we entered the nut and fruit bar category under the Ülker Go Ahead brand with five new products in December 2024. In 2025, we continued to offer consumers alternatives that are free from preservatives and colorants and whose sugar comes from fruit through this product portfolio. With its date-, nut-, and peanut-based ingredients, the range offers a high-fiber nutritional profile, while its bar option containing 20% protein supports protein intake.
- Altınbaşak Taco Flavored & Quinoa Snack combines quinoa and high-fiber content with baking technology to offer a new alternative in the chips category.
- The no added sugar version of Probis also reached consumers in 2025, extending the reach of one of our popular brands to a broader audience while offering consumers a new no added sugar product alternative.
- The fresh cake category has traditionally been defined by the need for a cold chain and limited shelf life. Ülker Chocolate Fresh Cake was launched as the first packaged fresh cake that can be stored under ambient conditions, features a high chocolate content, and can be produced on an industrial scale. Featuring a distinctive mold design and a height well above the industry standard, the product quickly exceeded its launch target.
- The "Dubai chocolate" trend, which became a global phenomenon, was transformed into a distinctive product through Ülker's R&D capabilities: Ülker Chocolate Istanbul Hazelnut & Crispy Kadayif and Baklava hit the shelves as a successful interpretation of the trend, enriched with a generous hazelnut content. A 35 g Dubai Chocolate Pistachio Bar was also developed to offer a more accessible format and facilitate portion control.
- The Dolu brand, which had previously been part of our portfolio, was relaunched with varieties containing 32% hazelnuts, 32% peanuts, and 32% almonds, supported by investments in new production facilities.
- Following extensive R&D efforts, Ülker Chocolate's classic square mold was modernized with the addition of cocoa bean logos.
- The launches of Dido Nut, Laviva Selection Pistachio, Hanımeller Milk Chocolate Cookie, and Çizi Çıtır contributed to diversified growth across the portfolio.

RESPONSIBLE MARKETING

At Ülker Bisküvi, all our marketing activities are grounded in the principles of transparency, ethical responsibility, and accountability. In line with our responsible marketing strategy, we make it a priority to provide the public with accurate and comprehensive information on product quality, production processes, and sustainability performance. We expect all our brands to embrace a transparent and accountable communication approach and to adhere to responsible marketing principles. With our consumer trust–oriented approach, we design our product promotions in line with the Responsible Nutrition Guidelines. In advertisements directed at children, we fully comply with established national and international standards, acting in line with children's rights and ethical marketing principles. In this regard, we transparently declare our commitment to all stakeholders by signing the National Food and Beverage Alliance Türkiye Commitment Statement.



CUSTOMER RELATIONS MANAGEMENT

The voice of the consumer is becoming more powerful and valuable than ever. In the real-time feedback environment created by social media and digital channels, customer experience is no longer merely a metric to be measured; it has become a source of insight that directly informs product development, category strategy, and brand decisions. With this understanding, Ülker goes beyond simply listening to the voice of the consumer, systematically processing it and placing it at the heart of its corporate processes.

We enable our consumers to share their feedback, requests and complaints with us through multiple channels. Through our Customer Communication Center, we receive submissions via our dedicated telephone line, e-mail, online contact forms and in-person communication, record them in our complaint management system and track them through to resolution. We acknowledge receipt of each submission, inform consumers of the expected resolution timeline in line with our defined service standards, and, where necessary, provide updates on the progress and outcome of their cases. We continuously evaluate opportunities to improve access to customer services and the overall service experience for consumers with disabilities and elderly consumers. We also accept submissions by post from elderly consumers or those without access to digital channels. To ensure that consumer feedback is handled effectively and transparently, we regularly review our complaint management practices.

Customer satisfaction surveys are conducted regularly every six months, and the results are systematically incorporated into product and service development processes. To reinforce consumer satisfaction, we prioritize visits to consumers who have submitted complaints or send them complimentary products. In 2025, 52 employees on the Customer Communication Center (CCC) team received training covering a wide range of topics, from effective communication and conflict management to productivity under stress and customer-focused behavior.

In 2025, **we resolved 31,762 of the 32,908** feedback submissions received by the Customer Communication Center **(CCC).**

Our **Net Promoter Score (NPS) was measured at 87%,** while the **Customer Satisfaction Survey,** conducted with a **37% customer coverage rate, recorded a score of 86%,** exceeding the set target.

Digital Sales Channels

In line with our goal of expanding the use of digital channels, we continued to develop the PMAktif e-Order Project. The platform, which covers 77,000 B2B customers, achieved an average monthly active usage rate of 33%; the 2026 target was set at a 40% active user rate and 35,000 outlets. This structure enables our traditional channel customers to place orders online, reducing the operational workload of sales representatives and enabling them to focus on more strategic tasks, while also making customer relationships more measurable and efficient.

Online sales channels	
Percentage of customers using online sales channels	33%
Percentage of revenue obtained from online sales channels	4%

CORPORATE SOCIAL RESPONSIBILITY

We continued our social responsibility efforts in 2025, taking into account community sensitivities and the needs of children. We continued our support for the earthquake-affected region without interruption. At the Hatay İSO Life City container settlement, we renovated and installed lighting at the basketball court built by AFAD, enabling it to be used for longer hours during the summer months. During Ramadan, food parcels prepared by the Red Crescent, along with children's packages containing Ülker products, were delivered to those in need. During Eid al-Adha, we sent our festive products to the region.

Make Happy, Be Happy Day

As part of "Make Happy, Be Happy Day," celebrated on the third Thursday of November each year, we continued to support children. With the support of our sales teams and production facilities, and in collaboration with the Red Crescent, we delivered winter clothing, books, and Ülker products to 841 children in Ağrı and Van.



Support for the Turkish National Paralympic Committee

In 2024, we became one of the supporters of the Turkish National Paralympic Committee (TMPK). In 2025, we extended this collaboration for another four years, through the Los Angeles 2028 Paralympic Games. Throughout the year, the inspiring stories of Paralympic athletes were shared on Ülker's and Onedio's YouTube channels through the "Yüreğiyle Yarışanlar" video series. The videos reached approximately 1 million views, helping to strengthen public awareness of athletes with disabilities. We supported the European Para Youth Games, hosted by the TMPK in Istanbul, as the main sponsor. The Turkish National Team finished first at the event, winning a total of 77 medals: 22 gold, 33 silver, and 22 bronze. We also supported the World Abilitysport Beach Games as the main sponsor.



Ülker My Beautiful Country Forest is Growing

We continued expanding Ülker Beautiful Country Forest in 2025. While continuing to support the "A Breath for the Future" sapling planting campaign launched by the Ministry of Agriculture and Forestry in 2019, we planted 15,850 saplings in Karaman and Ankara on November 11, National Afforestation Day. Thus, we increased the total number of saplings in Ankara, Karaman, Kocaeli, Muğla, Elazığ, Eskişehir, Hatay, and Gümüşhane to 194,350.





APPENDICES

By promoting the adoption of innovative sustainability practices, we help shape the future of our industry and demonstrate our commitment through our strong performance in leading sustainability indices.

- Memberships and Collaborations
- Corporate Governance Table
- Reporting Guidelines
- Performance Indicators
- Indices
- Glossary of Terms
- Limited Assurance Report



APPENDIX 1: Memberships and Collaborations

As Ülker Bisküvi, we prioritize contributing transparently to public policy development processes and taking an active role in the industry associations, chambers of commerce and industry, foundations, and platforms we participate in. We ensure that the activities conducted through these memberships align with our company's sustainability strategies and global goals (e.g., the Paris Agreement, Sustainable Development Goals, etc.).

Memberships	Role of Ülker Bisküvi in These Institutions
Ankara Chamber of Industry	Ülker Bisküvi participates in working group meetings as part of its membership in chambers of industry and commerce, providing collaboration and expertise support.
Ankara Commodity Exchange	
Ankara Chamber of Commerce	
UN Global Compact	By signing the United Nations Global Compact (UN Global Compact) in 2025, we reinforced our commitment to universal principles related to human rights, labour standards, environmental protection, and anti-corruption.
Foreign Economic Relations Board (DEİK)	At Ülker Bisküvi, we engage in collaborations and provide expertise as part of our DEİK membership, which coordinates research on investment opportunities for the Turkish private sector domestically and internationally, contributes to boosting Türkiye's exports, and oversees similar business development activities.
World Cocoa Foundation (WCF)	The World Cocoa Foundation (WCF) is a non-profit organization with more than 90 members that works to improve the sustainability of the cocoa supply chain, address climate-related risks, and support the goals of the Paris Agreement. As a member of the WCF, Ülker Bisküvi participates in projects and collaborations aimed at promoting sustainable cocoa sourcing, while also benefiting from the organization's expertise and technical support.
Federation of Cocoa Commerce (FCC)	At Ülker Bisküvi, through our FCC membership, we contribute to efforts to develop international trade standards, improve contract practices, and enhance traceability in the supply chain, supporting fair and sustainable practices in global cocoa trade.
Earthworm Foundation	In our collaboration with the Foundation, which recognizes climate risks and supports transformation policies aligned with the Paris Agreement, we carry out projects to integrate sustainability principles into our supply chain, particularly in the areas of palm oil and combating deforestation.
Food Drink Europe	At Ülker Bisküvi, through our Food Drink Europe membership—which engages in activities on agri-food economic plans in the EU and works on standardizing industry-funded research—we participate in EU-level projects, foster collaborations, and provide technical expertise.
Gebze Chamber of Commerce	As part of our membership, we attend working group meetings, contribute to various projects, engage in collaborations, and provide technical expertise.
International Life Sciences Institute (ILSI) Europe	Ülker Bisküvi contributes to research and policy recommendations on nutrition, food safety, consumer trust, and sustainability through its ILSI Europe membership.
Istanbul Exporters' Associations	Ülker Bisküvi is a member of the chambers of industry and commerce in the regions where it operates in Türkiye, enabling it to follow sectoral developments; by attending organized meetings and technical working groups, it develops collaborations on issues such as sustainable production, food safety, and enhancing export capacity.
Istanbul Chamber of Industry	
Istanbul Commodity Exchange	
Istanbul Chamber of Commerce	
Business Council for Sustainable Development Türkiye (BCSD Türkiye)	SKD Türkiye, as the Turkish partner of the World Business Council for Sustainable Development (WBCSD), facilitates collaboration and knowledge sharing in the field of sustainability. As Ülker Bisküvi, we provide financial support to projects and engage in various collaborations within the scope of the SKD Türkiye Sustainable Agriculture and Food Access Working Group. In addition, Mete Buyurgan, President of pladis UK & Ireland, serves as a Member of the Board of Directors of SKD Türkiye.
Sustainability Academy	As part of the Sustainable Food Platform membership, we have joined the Food Waste and Management Working Group, the Transparency and Traceability Working Group, the Climate Change and Resource Management Working Group, and the Sustainable Supply Chain and Agriculture Working Group, and have provided support for projects within each of these groups.
Kocaeli Chamber of Industry	Ülker Bisküvi participates in working group meetings and provides collaboration and technical expertise as part of its membership in chambers of industry and commerce.
Association of Confectionery Manufacturers (SEMAD)	Ülker Bisküvi, as a member of the Association of Confectionery Manufacturers (SEMAD), which brings together organizations in the Turkish confectionery sector, participates in working group meetings, engages in collaborations, and provides technical expertise within this scope.
Turkish Food Industry Employers' Union (TÜGİS)	Within the scope of TÜGİS membership, we participate in various projects and provide technical support on the preparation of laws, regulations, and directives related to food, as well as on Codex work concerning sub-sectors, food safety, food storage, food logistics, food packaging, and food retailing.
Advertisers Association of Türkiye	Ülker Bisküvi, as a member of the Advertisers Association of Türkiye, which works for the healthy functioning and development of the advertising sector, follows industry developments.
Sales Network	As a member company of Sales Network, Ülker contributes to initiatives focused on sustainability, inclusivity, and industry collaboration.

APPENDIX 2: Communication Methods with Stakeholders

Stakeholder Group	Impact on the Value Chain	Impact on the Value Chain Direct Impact Indirect Impact	Communication Frequency	Discussed Topics	Related Material Topics	How We Respond
Employees	Direct Impact	Satisfaction surveys, OHS committee meetings, announcements and information, internal publications, annual and sustainability reports, trainings, workshops, website, industrial relations boards, employee support hotline, Akıl Küpü (Brain Cube), stakeholder analysis	Daily	• Wages and benefits • Fair labor practices • Human rights and ethics • Work-life balance • Remote work opportunities • Healthy living, awareness, social support • Career opportunities • Succession planning support for critical roles • Learning and development • Employee volunteering • Diversity, equity, and inclusion (DEI)	• Equal Opportunity and Diversity • Talent Management • Human Rights • Employee Engagement and Satisfaction • Data Security • Occupational Health and Safety (OHS)	• At Ülker, we embrace the principle of equal pay for equal work. • Our Ethics Hotline and our Ethics and Human Rights Committee promote ethical conduct while fostering a safe and inclusive workplace environment. • We provide a healthy work-life balance through flexible working hours and remote work options. • We organize trainings and seminars on nutrition, health, and psychological well-being. • We organize workshops on awareness and personal development. • We offer training programs focused on department-based development and skill-building. • We provide employees with instant reward and recognition programs. • We organize regular one-on-one meetings between employees and their managers. • Through our club programs, we encourage employees to participate in sports and various hobbies.
Industry Associations, NGOs, and International Organizations	Indirect Impact	Memberships and board memberships, active participation in meetings and joint initiatives, annual reports, sustainability reports, announcements, seminars, conferences, website, stakeholder analysis	Monthly	• Climate action • Social and environmental impact analysis • Efficient energy use • Reducing global GHG emissions, improving energy efficiency standards • Innovation and consumer access to affordable, high-quality products • Policy development and public consultations • Regular reporting of activities and enhancing sustainability reporting performance and transparency	• Ethics, Compliance, and Transparency • Climate Crisis • R&D and Innovation • Innovative Business Models and Entrepreneurship • Operational Excellence and Efficiency • Food Safety and Quality • Corporate Governance • Ethics, Compliance, and Transparency	• At Ülker Bisküvi, we are advancing toward Net Zero by 2050 to mitigate the impacts of the climate crisis. • In line with the Science Based Targets initiative (SBTi), we have committed to a 2030 interim target and a 2050 Net Zero target. • As part of the Carbon Disclosure Project (CDP), which we joined in 2016, we continue to disclose our climate change strategy and our CO_2 emissions. • Our Human Rights Policy, developed on the basis of the OECD Guidelines for Multinational Enterprises and the International Labour Organization Conventions, together with the training we provide, ensures that our blue- and white-collar employees, as well as our suppliers, adopt and integrate human rights and ethical principles into their business processes.

APPENDIX 2: Communication Methods with Stakeholders

Stakeholder Group	Impact on the Value Chain	Impact on the Value Chain Direct Impact Indirect Impact	Communication Frequency	Discussed Topics	Related Material Topics	How We Respond
Distributors and Suppliers	Direct Impact	One-on-one meetings, annual reports, sustainability reports, quality audits, relevant policies and documents, website, stakeholder analysis	Weekly	• Traceability, good agricultural practices, responsible sourcing • Technical guidance and information sharing on sustainability, quality, and production • Development of joint improvement projects • Efficiency in agricultural production and sustainable practices in the supply chain	• Responsible Sourcing • Raw Material Sourcing • Water • Food Safety and Quality • Conservation of Biodiversity • Human Rights • Local Socio-Economic Development • Operational Excellence and Efficiency • Balanced Nutrition	• As part of the pladis Supplier Code of Conduct aimed at supplier development, we implement the Supplier Environmental, Social, and Governance (ESG) Program. • We support supplier development through sustainability, social compliance, quality audits, and corrective action plans. • We prioritize sustainability awareness and engagement by working closely with our suppliers. • We provide advertising and communication support to support our authorized dealers.
Shareholders and Investors	Direct Impact	General assembly meetings, material event disclosures, press releases, one-on-one meetings and correspondence, conference participations, brokerage/bank reports, periodic information letters, annual reports, sustainability reports, website, perception surveys, stakeholder analysis	Weekly	• Transparent sustainability reporting, KPI and target setting. • Participation in global sustainability indices through strong leadership • Management of human rights issues	• Corporate Governance • Integrated Risk Management • Ethics, Compliance, and Transparency • Innovative Business Models and Entrepreneurship	• In the Corporate Sustainability Assessment conducted by S&P Global, we were ranked among the top performers in environmental, social, and governance (ESG) performance for the fifth consecutive year. • We have remained included in the BIST Sustainability Index since 2015. • In our Sustainability Report, we share information related to the Task Force on Climate-related Financial Disclosures (TCFD) and include the TCFD index. • In our second TSRS-compliant report, we transparently disclosed our climate-related risks and opportunities to the public.
Public Institutions	Indirect Impact	One-on-one meetings, annual reports, sustainability reports, stakeholder analysis	Monthly	• Water, wastewater, and waste management • Sustainable agriculture programs • Economic and social development through the conservation of natural resources • Climate crisis and reduction of CO_2 emissions • Energy efficiency • Sustainable technologies • Social responsibility programs	• Climate crisis • Responsible Sourcing • Packaging • Water • Waste and Wastewater • Integrated Risk Management • Ethics, Compliance, and Transparency • Operational Excellence and Efficiency • Responsible Marketing and Product Labels • Food safety and Quality • Packaging	• We value transparency and share our processes openly through sustainability reports. • We develop joint projects with public institutions and provide technical support for the drafting of laws and regulations through survey participation and feedback. • We ensure regular monitoring of permits, certifications, and licensing processes through our risk management system.

APPENDIX 2: Communication Methods with Stakeholders

Stakeholder Group	Impact on the Value Chain	Impact on the Value Chain Direct Impact Indirect Impact	Communication Frequency	Discussed Topics	Related Material Topics	How We Respond
Media	Indirect Impact	One-on-one meetings, press conferences, annual reports, sustainability reports, announcements and statements, website, social media, stakeholder analysis	Weekly	• Social responsibility programs • Corporate communication processes for sustainability topics • Social and environmental impact assessments • Sustainability indices	• Ethics, Compliance, and Transparency • Responsible Marketing and Product Labels • Local Socio-Economic Development	We share our sustainability-focused initiatives, projects, Corporate Social Responsibility projects, awards, and announcements through our communication channels.
Consumers	Direct Impact	Ülker Customer Communication Center, website, annual reports, sustainability reports, news, announcements, social media, consumer surveys, stakeholder analysis	Daily	• Improvement in product quality • Products with sustainability attributes • Growing sustainability partnerships • Increase in customer satisfaction and loyalty • Energy and water savings in production	• Balanced Nutrition • Food Safety and Quality • Responsible Marketing and Product Labels • Ethics, Compliance, and Transparency • Innovative Business Models and Entrepreneurship • Food Safety and Quality • Balanced Nutrition • Packaging • R&D and Innovation	• We are developing joint projects that will promote an omnichannel approach, such as online sales. • We are building teams with the necessary knowledge and skills to effectively deliver and promote our products to consumers. • We provide competency training support to dealers and employees. • We provide incentives to increase customer satisfaction. • We value transparency and share our processes openly through sustainability reports.
Universities	Indirect Impact	One-on-one meetings, annual reports, sustainability reports, website, social media, stakeholder analysis, conference participation	Monthly	• Water, wastewater, waste management, sustainable agriculture programs • Economic and social development through the conservation of natural resources • Climate crisis and reduction of CO_2 emissions • Energy efficiency • Sustainable technologies • Social responsibility programs	• Climate Crisis • Water • Talent Management • Raw Material Sourcing • Equal Opportunity and Diversity • Balanced Nutrition	• We reach university students through our talent acquisition program bizz@campus and internship programs. • We are developing joint projects to enhance efficiency in agricultural production and supporting initiatives on water efficiency in agriculture and the improvement of product nutritional values within the framework of industry–university collaborations. • We support master's and doctoral programs through our R&D team.

APPENDIX 3: Corporate Governance Matrix

BoD and Committees	Members	Roles, Responsibilities, and Areas of Authority	2025 Activities
Board of Directors	Ahmet Bal (Chair of the Board – Independent Member) Yahya Ülker (Vice Chair of the Board) Özgür Kölükfakı (Board Member) Mehmet Tütüncü (Board Member) İbrahim Taşkın (Board Member) Sridhar Ramamurthy (Board Member) Füsun Kuran (Board Member – Independent Member) F. Pınar Ilgaz (Board Member – Independent Member)	• The Audit Committee oversees the Corporate Governance Committee, the Early Detection of Risk Committee, and the Sustainability Committee. • Identification and management of all strategic risks and opportunities, including ESG topics • Approval and public disclosure of new policies and procedures	• 4 meetings were held.
Early Detection of Risk Committee	Füsun Kuran (Chair, Independent Member) Ahmet Bal (Member, Chair of the Board (Independent))	• Establishing a Corporate Risk Management system, which enables the systematic early identification of risks that may affect the company's existence, development, and sustainability • Reviews the impact and probability assessments of risks identified in the risk inventory, taking into account the Company's established risk appetite and risk tolerance thresholds. • Monitors enterprise risk management activities, including the development of mitigation measures and action plans aimed at reducing the impact and likelihood of prioritized risks. • Ensures the effective implementation of enterprise risk management activities within a robust governance framework, coordinates and monitors related efforts, and reports to the Board of Directors.	• 6 meetings were held.
Audit Committee	Ahmet Bal (Chair, Independent) Füsun Kuran (Member, Independent)	• Supervise the financial reporting systems and internal audit processes. • Selects the independent auditor and management of the audit process. • Evaluates the accuracy of financial disclosures.	• 4 meetings were held.
Corporate Governance Committee	F. Pınar Ilgaz (Chair, Independent) Ahmet Bal (Member, Independent) Verda Beste Taşar (Investor Relations Director)	• Monitors corporate governance practices and provides improvement recommendations. • Evaluates candidates for the Board of Directors and compensation principles. • Oversees investor relations activities.	• 4 meetings were held.
Sustainability Committee	F. Pınar Ilgaz (Independent Board Member - Chair) Ahmet Bal (Independent Board Member - Member) Füsun Kuran (Board Member - Member) Özgür Kölükfakı (Board Member/CEO – Member) Süheyl Aybar (Vice President of Sustainability - Member) Committee Secretariat: Verda Beste Taşar (Investor Relations Director)	• Evaluates the defined ESG strategy and policies • Monitors the reporting and practices within the framework of the CMB Sustainability Principles Compliance • Monitors and oversees the sustainability targets and performance	• The committee began operations in 2025. • 2 meetings were held.

APPENDIX 3: Corporate Governance Matrix

BoD and Committees	Members	Roles, Responsibilities, and Areas of Authority	2025 Activities
Cybersecurity and Information Security Board	Murat Zaralı (Chair) Faruk Gözleveli (Member) Süheyl Aybar (Member)	• Makes the policy and strategy decisions related to cybersecurity and information security, and monitoring technology roadmap processes • Oversees the efforts to raise awareness, training, and awareness-raising activities on cybersecurity • Evaluates the processes for detecting cybersecurity vulnerabilities and for emergency and crisis management plans. • The Board reports periodically to Yahya Ülker, Member of the Ülker Bisküvi Board of Directors and Transformation and Technology Leader (CTO) at Yıldız Holding and pladis.	• 4 meetings were held.
Ethics and Human Rights Committee	Faruk Gözleveli (Chair) Alper Kantar (Member) Kenan Kayhan (Member) Süheyl Aybar (Member) Emel Birer (Member)	• Evaluates the results of internal audits conducted within the framework of the company's fight against bribery and corruption, high-risk issues, and matters related to ethical principles. • Examines and investigates the obstacles to the protection of human rights and the exercise of employee rights and freedoms, and monitors the processes for resolving such violations. • The Committee reports to the CEO of Ülker Bisküvi at regular intervals.	• 4 meetings were held.
Personal Data Protection Executive Committee	Faruk Gözleveli (Chair) It consists of 10 different department managers.	The Committee carries out activities to fulfill the obligations under the Protection of Personal Data, ensure the implementation of policies, monitor their execution, and provide recommendations regarding their functioning.	• 4 meetings were held.

APPENDIX 4: Board Competency Matrix

		Member 1	Member 2	Member 3	Member 4	Member 5	Member 6	Member 7	Member 8
		Ahmet Bal	Yahya Ülker	Mehmet Tütüncü	Sridhar Ramamurth	Özgür Kölükfakı	İbrahim Taşkın	Füsun Kuran	F. Pınar Ilgaz
Member category	**Description**								
Independent member	Indicates that the Board member is an independent member.	•						•	•
Executive member	Indicates that the Board member is an executive member.		•	•	•	•	•		
Non-Executive Member	Indicates that the Board member is neither an executive nor an independent member.	•						•	•
Competencies	**Description**								
Financial management experience	Indicates financial management skills such as budgeting, cash flow management, investment analysis, accounting, financial reporting, and independent audit.	•	•	•	•			•	
Industry/sector experience	Indicates operational or strategic-level experience related to the food, fast-moving consumer goods (FMCG), retail, and distribution ecosystem in which the Company operates. A Board member having served on the board of a different company in the same sector alone is not considered sector experience.	•	•	•	•	•		•	•
Legal, regulatory, and public policy experience	Indicates experience in food safety legislation, competition law, consumer law, international trade regulations, and public policy.						•		•
International market experience	Indicates knowledge and experience in operating in different countries, multinational organization management, exports, regulatory compliance, and global growth strategies.	•	•	•	•	•		•	•
Production, operations, and supply chain management experience	Indicates experience in production processes, quality systems, raw material sourcing, agricultural inputs, logistics, and global supply chain management.		•	•	•	•			
Risk management experience	Indicates work experience in managing strategic, financial, and operational risks.	•		•	•	•	•	•	•
Sustainability/ESG experience	Indicates work experience, project experience, and knowledge in sustainability and ESG matters.	•	•	•	•	•	•	•	•
Brand, marketing, and corporate communications experience	Indicates strategic-level experience in brand management, marketing strategies, consumer behavior analysis, reputation management, crisis communication, and multi-channel communication processes.		•			•		•	
Digitalization, data, and cybersecurity experience	Indicates experience in cybersecurity, artificial intelligence, big data, IT architecture, and ecosystem management.		•	•	•	•			
Senior management experience	Indicates the Board member's past senior management experience and their knowledge and work experience in running and managing the operational activities of an organization.	•	•	•	•	•	•	•	•
Board experience	Indicates that the Board member has previously served on a board of directors.	•	•	•	•	•	•	•	•
Demographic characteristics	**Description**								
Age	Indicates the age of the Board member as of the end of the reporting year.	69	33	68	57	53	61	49	61
Tenure	Indicates the Board member's length of service on the Company's Board of Directors.	5	1	1	2	1	10	4	5
Gender	Indicates the gender of the Board member.	Male	Male	Male	Male	Male	Male	Female	Female

APPENDIX 5: Reporting Guidance

This reporting guidance provides information on the preparation, calculation, and reporting methodologies of the data related to the indicators subject to limited assurance audit included in Ülker Bisküvi Sanayi A.Ş. ("Company" or "Ülker Bisküvi") 2025 Sustainability Report ("2025 Sustainability Report").

These indicators cover social and environmental metrics. The Company management is responsible for ensuring that appropriate procedures are applied to prepare the indicators specified below, in all material respects, in accordance with the Reporting Guidance.

The information contained in this Guidance covers the 2025 fiscal year ending on December 31, 2025 (January 1 – December 31, 2025) and includes the operations of Ülker Bisküvi in Türkiye at the facilities located in Ankara, Gebze, Karaman, Silivri, and Topkapı, and the overseas locations in Kazakhstan, Saudi Arabia, and Egypt, as detailed in the "Key Definitions and Reporting Scope" section, and does not include contractor and subcontractor information.

General Reporting Principles

The following principles have been taken into account in the preparation of this guidance document:

- In the preparation of information – emphasizing the fundamental principles of appropriateness and reliability of the information for its users;
- In the reporting of information – emphasizing the principles of comparability and consistency with other data, including the previous year, as well as the principles of clarity, understandability, and transparency for users.

Key Definitions and Reporting Scope

For the purpose of this report, the Company provides the following definitions:

INDICATORS		SCOPE
SOCIAL INDICATORS	Number of Fatalities (#)	Represents the rate of work-related accidents resulting in the death of Company employees during the reporting period. This metric also includes contractor employees.
	Lost Time Accident Frequency Rate	Refers to the number of lost days due to injuries sustained by employees during activities defined by occupational safety laws and regulations, which prevented them from reporting to work on the following shift or business day, as monitored through notifications made to the Social Security Institution during the reporting period.
	Occupational Disease Rate	Refers to temporary or permanent illness or disability suffered by employees due to repetitive factors related to the nature of the work performed or as a result of the conditions under which the work is carried out during the reporting period. This metric also includes contractor employees.
	Accident Severity Rate	Represents the ratio of lost working hours, calculated based on lost days recorded during the reporting period, to total working hours. This metric also includes contractor employees.
	Representation of Influence in Occupational Health and Safety Committees (%)	Represents the rate of white-collar and blue-collar employees being represented by union and OHS officials during the reporting period.
ENVIRONMENTAL INDICATORS	Energy Consumption (MWh)	Represents the Company's total energy consumption during the reporting period. This consumption is monitored monthly through invoices and statements provided by the energy supplier. Energy consumption data refers to the consumption of electricity, natural gas, LPG, diesel (company vehicles), gasoline (company vehicles), diesel (generators), as well as renewable energy across all the Company's plants and facilities.
	Water Withdrawal (m^3)	Includes the total municipal supply and well water consumption across all of the Company's facilities during the reporting period.
	Wastewater Volume (m^3)	Represents the total amount of water discharged by the Company during the reporting period.
	Water Consumption (m^3)	Represents the total amount of water that evaporated during the Company's production, was incorporated into the product, or was classified as loss and leakage during the reporting period.
	Water Intensity (m^3/ton)	Represents the total water withdrawn per ton of product produced by the Company during the reporting period.

APPENDIX 5: Reporting Guidance

INDICATORS		SCOPE
ENVIRONMENTAL INDICATORS	Scope 1 (tCO_2)	Represents the emissions calculated by the Company from natural gas, LPG, diesel, gasoline, and refrigerant gases, expressed in tons of CO_2 during the reporting period.
	Scope 2 (tCO_2) Location-Based and Market-Based	Represents the emissions from the Company's electricity consumption during the reporting period. • Location-Based Emissions: Represents the emissions from purchased electricity. • Market-Based Emissions: Represents the emissions from the consumption of purchased non-renewable electricity.
	Scope 3 (tCO_2)	Represents the Company's total Scope 3 emissions across all categories during the reporting period.
	Scope 3 Category 1 – Purchased Goods and Services (tCO_2)	Represents the emissions from purchased goods and services used in the Company's activities during the reporting period.
	Scope 3 Category 2 – Capital Goods (tCO_2)	Represents the emissions from the production of capital goods purchased or acquired by the Company during the reporting period.
	Scope 3 Category 3 – Fuel and Energy-Related Activities (not included in Scope 1 or Scope 2) (tCO_2	Represents the emissions from energy purchased and consumed by the Company that are not included in Scope 1 or Scope 2 during the reporting period. Electricity, natural gas, diesel, and LPG consumption are included in the calculation.
	Scope 3 Category 4 – Upstream Transportation and Distribution (tCO_2)	Represents the emissions from the transportation and distribution of products purchased by the Company between its suppliers and its own operations (in vehicles and facilities not owned or operated by the Company) during the reporting period. This category covers the transportation of incoming materials and packaging.
	Scope 3 Category 5 – Waste Generated in Operations (tCO_2)	Represents the emissions from the disposal and/or processing of waste generated in the Company's operations by third parties during the reporting period. Plastic, organic (mixed food and garden waste), commercial and industrial waste, as well as food and beverage waste generated from the Company's operations are included in the calculation.
	Scope 3 Category 6 – Business Travel (tCO_2)	Represents the emissions calculated from the total flight distance traveled by the Company's employees for business trips, as well as the emissions from their accommodations during these trips in the reporting period.
	Scope 3 Category 7 – Employee Commuting (tCO_2)	Represents the emissions from the fuels consumed by shuttle services used by the Company's employees during the reporting period.
	Scope 3 Category 8 – Upstream Leased Assets (tCO_2)	Includes emissions from the operation of assets leased by the Company that are not covered in Scope 1 or Scope 2 during the reporting period.
	Scope 3 Category 9 – Downstream Transportation and Distribution (tCO_2)	Represents the emissions from the transportation and distribution of products sold by the Company during the reporting period. Includes only the emissions from the transportation and distribution of products after the point of sale. Emissions from domestic sales, international sales, and storage have been calculated separately.
	Scope 3 Category 11 – Use of Sold Products (tCO_2)	Represents the emissions from goods and services sold by the Company during the reporting period. Calculations are made based on the country of consumption (temperate or tropical/subtropical), as the percentage of chocolate-based products requiring cooling varies.
	Scope 3 Category 12 – End-of-Life Treatment of Sold Products (tCO_2)	Includes the emissions from the mass of products and packaging sold by the Company, from the point of sale to the end of the product's life after consumer use, during the reporting period. Packaging and waste emissions are included in the calculation.
	Hazardous Wastes (tons)	Represents the amount of hazardous waste generated by the Company, monitored through MOTAT (Mobile Waste Tracking System) and the Waste Scorecard on the Ministry of Environment's Integrated Environmental Information System portal. Consists of the Company's waste that is recycled/recovered, energy-recovered, disposed/destroyed, or sent to landfill.
	Non-Hazardous Waste (tons)	Represents the amount of non-hazardous waste generated by the Company, monitored through the Company's Waste Scorecard. Consists of the food waste generated by the Company that was recycled/recovered, recovered for energy purposes, disposed/destroyed, sent to landfill, or sent for animal feed during the reporting period.
	Recycled Waste Rate (%)	Represents the rate of waste recovered and/or recycled by the Company, as monitored through waste declarations and reported to the local government, to the total waste generated during the reporting period.

APPENDIX 5: Reporting Guidance

Data Preparation

Social Indicators

Number of Fatal Accidents: Represents the reported number of fatal accidents.

Lost Time Accident Frequency Rate (LTAR): The Lost Time Accident Frequency Rate is calculated using the following formula.

Lost Time Accident Frequency Rate (LTAR) = (Number of Lost Time Accidents / Total Working Hours) × 200,000 (for the relevant period).

Occupational Disease Rate (ODR): The Occupational Disease Rate is calculated using the following formula:

Occupational Disease Rate (ODR): (Number of Occupational Diseases / Total Number of Employees) × 1,000)

Accident Severity Rate (ASR): The Accident Severity Rate is calculated using the following formula.

Accident Severity Rate (ASR): (Total Lost Working Hours from Work-Related Accidents / Total Working Hours) × 1,000 (for the relevant period).

Environmental Indicators

Energy Consumption

Within the scope of energy consumption data, primary energy sources including electricity, natural gas, diesel, and gasoline are reported. Electricity consumption data is obtained from service providers' meters and invoices. Diesel consumption data is obtained from service providers' invoices for generators and company-owned vehicles. Gasoline consumption data is obtained from service providers' invoices for company-owned vehicles.

The Company applies the published conversion factors listed below in its energy consumption calculations:

- Since electricity supply is invoiced in kWh, a conversion factor of 1 kWh = 0.001 MWh has been applied.
- Since natural gas supply is invoiced in m^3, during the conversion to MWh, consumption is first converted to KJ using the factor 8,250 kcal/m^3 × 4.186 KJ/kcal / 1,000, and the resulting value is then divided by 0.0036 to obtain MWh. Finally, a conversion factor of 1 sm^3 = 0.009593 MWh has been applied.
- Since the LPG supply unit is invoiced in kg, during the conversion to MWh, consumption is first converted to KJ using the factor 10,900 kcal/kg × 4.186 KJ/kcal / 1,000, and the resulting value is then divided by 0.0036 to obtain MWh. Finally, a conversion factor of 1 kg = 0.01267 MWh has been applied.
- Since the LNG supply unit is invoiced in liters, during the conversion to MWh, consumption is first converted to KJ using the factor 11,930 kcal/m^3 × 4.186 KJ/kcal / 1,000, and the resulting value is then divided by 0.0036 to obtain MWh. Finally, a conversion factor of 1 kg = 0.01387 MWh has been applied.
- Since the gasoline supply unit is invoiced in liters, during the conversion to MWh, consumption is first converted to KJ using the factor 10,400 kcal/m^3 × 4.186 KJ/kcal / 1,000, and the resulting value is then divided by 0.0036 to obtain MWh. Finally, a conversion factor of 1 liter = 0.01209 MWh has been applied.
- Since the diesel supply unit is invoiced in liters, during the conversion to MWh, consumption is first converted to KJ using the factor 10,200 kcal/m^3 × 4.186 KJ/kcal / 1,000, and the resulting value is then divided by 0.0036 to obtain MWh. Finally, a conversion factor of 1 liter = 0.01186 MWh has been applied.
- For densities and coefficients, the "Regulation on Increasing Efficiency in the Use of Energy Sources and Energy (Official Gazette: October 27, 2011/28097: Amendment 03/09/2014-29108), Annex-2: The "Lower Heating Values of Energy Sources and Conversion Factors to Oil Equivalent" table has been applied.

Greenhouse Gas (GHG) Emissions

GHG emissions have been calculated in accordance with the World Resources Institute (WRI) / World Business Council on Sustainable Development (WBCSD) GHG Protocol. The organization's boundaries have been determined using the control approach, and the sources of GHG emissions from production facilities under Company control in Türkiye are as follows:

Scope 1 – Direct GHG Emissions: Fuels used in factories and buildings, diesel-powered emergency generators, company vehicles, and refrigerants

Scope 2 – Energy-Induced Indirect GHG Emissions: Electricity consumption

APPENDIX 5: Reporting Guidance

Scope 3 – Other Indirect GHG Emissions:

Scope 3 Category 1 – Purchased Goods and Services

Scope 3 Category 2 – Capital Goods

Scope 3 Category 3 – Fuel and Energy-Related Activities (not included in Scope 1 or Scope 2)

Scope 3 Category 4 – Upstream Transportation and Distribution

Scope 3 Category 5 – Waste Generated in Operations

Scope 3 Category 6 – Business Travel

Scope 3 Category 7 – Employee Commuting

Scope 3 Category 8 – Upstream Leased Assets

Scope 3 Category 9 – Downstream Transportation and Distribution

Scope 3 Category 11 – Use of Sold Products

Scope 3 Category 12 – End-of-Life Treatment of Sold Products

In the calculations, CO_2, CH_4, and N_2O (refrigerant gas) emissions have been calculated using CO_2 equivalent factors. Global Warming Potential (GWP) coefficients have been obtained from the Intergovernmental Panel on Climate Change (IPCC) 5th Assessment Report and DEFRA Greenhouse

Gas Reporting: The conversion factors were obtained from DEFRA Greenhouse Gas Reporting: Conversion Factors 2025. The grid emission factor has been calculated using the relevant annual data provided by Turkish Electricity Transmission Corporation (TEİAŞ).

Emission Factor	CO_2	CH_4	N_2O	Total kg CO_2
Natural gas	1.9365	0.0010	0.0009	1.9384
Diesel	2.6248	0.0039	0.0377	2.6663
Diesel (Stationary)	2.6248	0.0030	0.0058	2.6337
Refrigerants - R410A	2,255.50	-	-	2,255.50
Refrigerants - R404A	4,728	-	-	4,728
Refrigerants - R407C	1,907.93	-	-	1,907.93
Refrigerants - R134A	1,530	-	-	1,530
Fire Extinguishers - HFC 227	3,600	-	-	3,600
Electricity (Grid) (2023)	0.4340			0.4340

APPENDIX 5: Reporting Guidance

Scope 3 Emission Factors:
The Company uses various references, data, and estimates as follows in calculating Scope 3 emissions for each category:

Scope 3 Categories	Emission Factor Unit	Data and references used in calculations
Category 1 Purchased Products and Services (Packaging)	ton	- DEFRA - Material Use Benchmark Values - Transportation Benchmark Values - EEIO category descriptions (based on NAICS – North American Industry Classification System) - Packaging Environmental Footprint (EF) and End-of-Life (EOL) calculations: - Factor A: The recycling-related burdens and benefits between the "material supplier" and the "material user," depending on market conditions - Factor MQL: According to the EU PEF CFF method, the material quality loss occurring during the recycling process
Category 1 Purchased Products and Services (Materials)	ton	- DEFRA - Transportation Data - CT Sea Distance Calculator v1.2 - Agri-footprint 5.0 (Agriculture-based environmental impact database) - Ecoinvent 3.9.1 (Life Cycle Inventory Database) - By using various feasibility models
Category 2 Capital Goods	Currency Ton	- DEFRA - Material Use Benchmark Values - Transportation Benchmark Values
Category 3: Fuel and Energy-Related Activities (not included in Scope 1 or Scope 2)	kwh, kg	- DEFRA - WTT+T&D for electricity
Category 4 – Upstream Transportation and Distribution	ton, km	- DEFRA - Well-to-Tank (WTT) + Transmission and Distribution (T&D) data for electricity
Category 5 – Waste Generated in Operations	ton	- DEFRA - Transportation Benchmark Values
Category 6 – Business Travel	km	- DEFRA (Business Travel – Air and Land Transportation)
Category 7 – Employee Commuting	L	- DEFRA
Category 8 – Upstream Leased Assets	ton, currency	- DEFRA
Category 9 – Downstream Transportation and Distribution	ton	- DEFRA - Estimated Maritime Distance - Transportation Benchmark Values - Fuels Consumed
Category 11 – Use of Sold Products	ton	- FPX Outputs (Tropical / Subtropical / Temperate Regions)
Category 12 – End-of-Life Treatment of Sold Products	ton	- United Nations International Waste Day data - Fuels Consumed

Water Withdrawal per Unit of Production (m³/ton)

Within the scope of water withdrawal data, municipal supply and groundwater are reported. Water withdrawal data is obtained from service providers' meters and invoices as well as internal meters. Production figures are obtained from scorecards/dashboards.

Water use (m³/ton): reported as municipal supply, well water, rainwater, and recovered water.

Water Intensity (m³/ton) = Total Water Withdrawal / Total Production Tonnage

Recycled Waste Rate (%)

Recycled Waste Rate = Recycled + Recovered / Total Waste Amount

Restatement Declaration

The measurement and reporting of verified data inevitably include a certain degree of estimation. If there is more than a 5% change in Company-level data, a Restatement Declaration may be considered.

APPENDIX 6: Environmental Performance Indicators

Energy Consumption (MWh)

	Ülker Türkiye Facilities		
Energy Consumption (MWh)	**2023**	**2024**	**2025**
Purchased electricity	50,326	0	0
Natural Gas	270,535	310,971	297,578
Generator (diesel)	977	2,095	444
LPG	44,620	0.27	0.08
Buildings (fuel-electricity)	**366,458**	**313,065**	**298,022**
Diesel	955	1,793	1,250
Gasoline	169	414	673
Vehicle Fuels	**1,124**	**2,207**	**1,923**
Renewable Energy	**106,000**	**159,259**	**156,593**
TOTAL	**473,582**	**474,531**	**456,538**
TOTAL (GIGAJOULE)	**1,704,896**	**1,708,312**	**1,643,536**

	Ülker Overseas Facilities		
Energy Consumption (MWh)	**2023**	**2024**	**2025**
Purchased electricity	50,874	54,317	26,518
Natural Gas	38,587	40,993	48,660
Generator (diesel)	12,217	15,277	18,016
LPG	30,507	17,748	16,672
Buildings (fuel-electricity)	**132,185**	**128,335**	**109,866**
Diesel	291	312	350
Gasoline	1,413	1,795	1,825
Vehicle Fuels	**1,704**	**2,107**	**2,122**
Renewable Energy	**0**	**0**	**31,747**
TOTAL	**133,889**	**130,443**	**143,789**
TOTAL (GIGAJOULE)	**482,001**	**469,595**	**517,641**

	Ülker Türkiye Raw Material Facilities		
Energy Consumption (MWh)	**2023**	**2024**	**2025**
Purchased electricity	0	0	0
Natural Gas	47,093	47,449	47,479
Generator (diesel)	65	62	16
LPG	544	0	0
LNG	914	830	506
Buildings (fuel-electricity)	**48,616**	**48,341**	**48,001**
Diesel	31	10	44
Gasoline	25	20	52
Vehicle Fuels	**56**	**30**	**96**
Renewable Energy	**64,984**	**69,333**	**67,355**
TOTAL	**113,656**	**117,704**	**115,451**
TOTAL (GIGAJOULE)	**409,160**	**423,736**	**415,625**

	Ülker-Consolidated		
Energy Consumption (MWh)	**2023**	**2024**	**2025**
Purchased electricity	101,200	54,317	26,518
Natural Gas	356,216	399,413	393,716
Generator (diesel)	13,259	17,434	18,477
LPG	75,671	17,749	16,672
LNG	914	830	506
Buildings (fuel-electricity)	**547,259**	**489,742**	**455,889**
Diesel	1,278	2,115	1,644
Gasoline	1,607	2,229	2,550
Vehicle Fuels	**2,884**	**4,344**	**4,194**
Renewable Energy	**170,984**	**228,592**	**255,695**
TOTAL	**721,127**	**722,678**	**715,778**
TOTAL (GIGAJOULE)	**2,596,057**	**2,601,643**	**2,576,802**

APPENDIX 6: Environmental Performance Indicators

GHG Emissions (tCO_2e) – Scope 1 and Scope 2

	Ülker Türkiye Facilities		
GHG Emissions (tCO_2e)	2023	2024	2025
Scope 1	72,700	74,933	73,721
CO_2	72,632	74,855	73,652
CH_4	33	35	32
N_2O	35	43	37
Scope 2 (Location-Based)	74,561	70,392	67,961
Scope 2 (Market-Based)	24,004	0	0
Total (Scope 1 and 2 - Location Based)	**147,261**	**145,325**	**141,682**
Total (Scope 1 and 2 - Market Based)*	**96,704**	**74,933**	**73,721**
CO_2	**96,489**	**74,855**	**73,652**
CH_4	**48**	**35**	**32**
N_2O	**168**	**43**	**37**

* The I-REC renewable energy certificates obtained from the Killik, Kayadüzü, Yamaçtepe-2, and Ardıçlı Wind Power Plants have been included in the calculations.

	Ülker Overseas Facilities		
GHG Emissions (tCO_2e)	2023	2024	2025
Scope 1	23,029	19,871	23,673
CO_2	22,984	19,829	23,627
CH_4	20	14	15
N_2O	25	29	32
Scope 2 (Location-Based)	27,963	29,840	31,801
Scope 2 (Market-Based)	27,963	29,840	16,189
Total (Scope 1 and 2 - Location Based)	**50,992**	**49,711**	**55,474**
Total (Scope 1 and 2 - Market Based)*	**50,992**	**49,711**	**39,862**
CO_2	**50,776**	**49,486**	**39,816**
CH_4	**37**	**32**	**15**
N_2O	**179**	**183**	**32**

	Ülker Türkiye Raw Material Facilities		
GHG Emissions (tCO_2e)	2023	2024	2025
Scope 1	10,145	11,264	10,925
CO_2	10,115	11,253	10,914
CH_4	25	5	5
N_2O	5	5	5
Scope 2 (Location-Based)	30,995	30,643	29,232
Scope 2 (Market-Based)	0	0	0
Total (Scope 1 and 2 - Location Based)	**41,139**	**41,907**	**40,157**
Total (Scope 1 and 2 - Market Based)*	**10,145**	**11,264**	**10,925**
CO_2	**10,115**	**11,253**	**10,915**
CH_4	**25**	**5**	**5**
N_2O	**5**	**5**	**5**

APPENDIX 6: Environmental Performance Indicators

Scope 3 GHG emissions (tCO_2e)

	Ülker Türkiye and Raw Material Facilities		
Scope 3 Category	**2023**	**2024**	**2025**
1a: Purchased goods and services (product)	1,850,324	1,791,708	1,660,832
1b: Purchased goods and services (non-product)	1,735	2,391	2,852
2: Capital goods	12,042	15,072	9,623
3: Fuel and energy-related activities	58,989	45,665	44,430
4: Transportation and distribution (upstream)	75,215	74,628	79,085
5: Waste generated in operations	536	286	199
6: Business travel	1,140	1,970	1,463
7: Employees commuting	4,319	5,016	5,262
8: Leased assets (upstream)	94	-	-
9: Transportation and distribution (downstream)	53,914	42,439	41,197
10: Processing of sold products*	-	-	-
11a: Use of sold products (directly)**	-	-	-
11b: Use of sold products (indirect)	12,275	9,834	8,022
12: End-of-life treatment of sold products	27,681	20,818	20,160
13: Leased assets (downstream)***	-	-	-
14: Franchises****	-	-	-
15: Investments*****	-	-	-
Total	**2,098,263**	**2,009,828**	**1,873,124**

*Processing of Sold Products: At Ülker facilities, since we produce the final product, no additional processing is applied to our products in the subsequent stages. Therefore, we do not have any CO2 emissions under the relevant category.
**Use of Sold Products: During the use of our products, there are no direct CO2 emissions; only CO2 emissions from storage conditions, which we classify as indirect, have been calculated.
***Leased Assets (Downstream): Out of scope.
****Franchises: Out of scope.
*****Investments: Out of scope.

	Ülker Overseas Facilities		
Scope 3 Category	**2023**	**2024**	**2025**
1a: Purchased goods and services (product)	220,475	246,698	286,900
1b: Purchased goods and services (non-product)	2,675	3,370	3,578
2: Capital goods	2,585	4,924	4,614
3: Fuel and energy-related activities	13,347	14,418	15,546
4: Transportation and distribution (upstream)	7,516	8,045	10,962
5: Waste generated in operations	722	933	1,012
6: Business travel	1,220	1,119	563
7: Employees commuting	2,555	2,757	2,760
8: Leased assets (upstream)	-	-	-
9: Transportation and distribution (downstream)	15,813	22,243	25,015
10: Processing of sold products*	-	-	-
11a: Use of sold products (directly)**	-	-	-
11b: Use of sold products (indirect)	3,336	1,578	2,183
12: End-of-life treatment of sold products	7,099	5,635	5,895
13: Leased assets (downstream)***	-	-	-
14: Franchises****	-	-	-
15: Investments*****	-	-	-
Total	**277,343**	**311,720**	**359,027**

*Processing of Sold Products: At Ülker facilities, since we produce the final product, no additional processing is applied to our products in the subsequent stages. Therefore, we do not have any CO2 emissions under the relevant category.
**Use of Sold Products: During the use of our products, there are no direct CO2 emissions; only CO2 emissions from storage conditions, which we classify as indirect, have been calculated.
***Leased Assets (Downstream): Out of scope.
****Franchises: Out of scope.
*****Investments: Out of scope.

APPENDIX 6: Environmental Performance Indicators

Ülker- Consolidated / SBTi Scope (tCO_2e)*

Indicator	2023	2024	2025
Scope 1	105,874	106,068	108,318
Scope 2 - Location-based	133,519	130,875	128,994
Scope 2 - Market-based	51,967	29,840	16,189
1a: Purchased goods and services (product)	2,070,798	2,038,406	1,947,732
1b: Purchased goods and services (non-product)	4,410	5,761	6,430
2: Capital goods	12,653	19,997	14,237
3: Fuel and energy-related activities	72,336	60,083	59,976
4: Transportation and distribution (upstream)	82,730	82,673	90,047
5: Waste generated in operations	1,257	1,219	1,210
6: Business travel	1,360	3,089	2,025
7: Employees commuting	6,874	7,773	8,022
8: Leased assets (upstream)	94	-	-
9: Transportation and distribution (downstream)	69,727	64,681	66,213
10: Processing of sold products	-	-	
11a: Use of sold products (directly)	-	-	
11b: Use of sold products (indirect)	15,611	11,413	10,205
12: End-of-life treatment of sold products	34,780	26,453	26,055
13: Leased assets (downstream	-	-	-
14: Franchises	-	-	-
15: Investments	-	-	-
Total	**2,375,606**	**2,321,548**	**2,232,151**
Total (Scope 1 and 2 - Location Based)	**239,393**	**236,942**	**237,313**
Total (Scope 1 and 2 - Market Based)	**157,841**	**135,908**	**124,508**
Total (Scope 1, 2 - Location-Based and 3)	**2,614,999**	**2,558,491**	**2,469,464**
Total (Scope 1, 2 - Market-Based and 3)	**2,533,447**	**2,457,456**	**2,356,659**

FLAG Emissions (tCO_2e)

	Ülker Türkiye and Raw Material Facilities		
	2023	2024	2025
Total FLAG	1,278,342	1,230,417	1,163,548
Total non-FLAG	487,028	454,505	396,531
Total Raw Material-Sourced Emissions	1,765,370	1,684,922	1,560,079

	Ülker Overseas Facilities		
	2023	2024	2025
Total FLAG	117,204	122,213	150,248
Total non-FLAG	89,005	95,510	107,387
Total Raw Material-Sourced Emissions	206,209	217,723	257,636

	Ülker- Consolidated		
	2023	2024	2025
Total FLAG	1,395,546	1,352,630	1,313,796
Total non-FLAG	576,033	550,015	503,919
Total Raw Material-Sourced Emissions	1,971,579	1,902,646	1,817,715

*Within the scope of SBTi, a total of 13 facilities, including Ülker (Türkiye), Ülker Raw Material, and Overseas facilities, have been consolidated, and 2023 has been designated as the base year.

APPENDIX 6: Environmental Performance Indicators

Other Air Emissions (kg/hour)*

Ülker Türkiye Facilities**								
Facility	Source (Number of Points)	CO	NO_2	NO	SO_2	Toz	TOC	VOC
Ülker Ankara	104	3.2	0.2	2.5	0.8	0.2	0	0
Ülker Gebze	116	5.9	5.9	3.8	0.1	0.2	0	0
Ülker Topkapı	19	0.4	5.1	3.2	0.04	0.2	0	0
Ülker Silivri	13	0.2	0.01	0.1	0.07	0.07	0	0
Ülker Karaman	145	6.0	4.6	2.9	0.06	0.2	0	0

*Measurements were conducted at sampling points designated for each facility, corresponding to a total of 148.5 operating hours.
**As part of its air quality management approach, Ülker continues to prioritize reducing VOC and dust emissions at its facilities. In this context, the targets set to reduce plastic use in packaging and production processes also indirectly contribute to minimizing sources of volatile organic compounds.

Ülker Raw Material Facilities*								
Facility	Source (Number of Points)	CO	NO_2	NO	SO_2	Dust	TOC	VOC
Ülker Ankara	Out of Scope	0	0	0	0	0	0	0
Ülker Giresun	8	0.1	0.3	0.2	0.03	0.001	0	0
Ülker Topkapı	16	0.4	1.8	1.1	0.04	0.2	0.004	0.0008
Ülker Karaman	Out of Scope	0	0	0	0	0	0	0

*The values represent instantaneous emission measurements in kg/hour (2025). Prohibited refrigerants, such as CFCs and R22, are not used in any of our facilities.

APPENDIX 6: Environmental Performance Indicators

Water Consumption (m³)

	Ülker Türkiye Facilities		
Indicator	**2023**	**2024**	**2025**
Municipal water	346,581	363,447	399,250
Groundwater	364,195	302,488	308,314
Total Water Withdrawal	**710,776**	**665,934**	**707,564**
Rainwater and water recovery	2,873	4,743	19,160
Total Water Use	**713,649**	**670,677**	**726,724**
Wastewater Volume	485,747	442,695	487,392
Water Consumption	227,902	227,982	239,332
Water Intensity (m³/ton)	1.35	1.28	1.40

	Ülker Overseas Facilities		
Indicator	**2023**	**2024**	**2025**
Municipal water	134,651	146,551	179,564
Groundwater	0	0	0
Total Water Withdrawal	**134,651**	**146,551**	**179,564**
Rainwater and water recovery	0	0	0
Total Water Use	**134,651**	**146,551**	**179,564**
Wastewater Volume	94,256	96,734	120,428
Water Consumption	40,395	49,817	59,136
Water Intensity (m³/ton)	1.47	1.49	1.76

	Ülker Türkiye Raw Material Facilities		
Indicator	**2023**	**2024**	**2025**
Municipal water	128,505	137,759	133,391
Groundwater	51,063	26,240	27,468
Total Water Withdrawal	**179,568**	**163,999**	**160,858**
Rainwater and water recovery	0	0	0
Total Water Use	**179,568**	**163,999**	**160,858**
Wastewater Volume	93,375	85,346	83,667
Water Consumption	86,193	78,653	77,191
Water Intensity (m³/ton)	0.45	0.42	0.41

	Ülker - Consolidated		
Indicator	**2023**	**2024**	**2025**
Municipal water	609,737	647,756	712,204
Groundwater	415,258	328,728	335,781
Total Water Withdrawal	**1,024,995**	**976,484**	**1,047,986**
Rainwater and water recovery	2,873	4,743	19,160
Total Water Use	**1,027,868**	**981,227**	**1,067,146**
Wastewater Volume	673,378	624,775	691,487
Water Consumption	354,490	356,452	375,658

Wastewater Discharge Parameters (tons)

	Average Values for All Ülker Facilities
Parameter	**2025**
Chemical Oxygen Demand – COD*	106.78
Biological Oxygen Demand – BOD	72.33
Suspended Solid	13.78
Total Nitrogen (TN)	4.82
Total Phosphorus (TP)	1.03
pH	7.6

*The target is to maintain Chemical Oxygen Demand (COD) at 200 mg/L or below at the wastewater discharge outlets of all production facilities.

APPENDIX 6: Environmental Performance Indicators

Waste Data (tons)

Ülker Türkiye Facilities

Indicator	2023			2024			2025		
Types of Waste	Waste (tons)		Total (tons)	Waste (tons)		Total (tons)	Waste (tons)		Total (tons)
	Hazardous Waste	Non-Hazardous Waste		Hazardous Waste	Non-Hazardous Waste		Hazardous Waste	Non-Hazardous Waste	
Recovery (Energy)	2	681	683	106	4,149	4,256	14 ✓	2,374 ✓	2,388 ✓
Recovery/Recycling	61	16,979	17,040	39	16,430	16,469	38 ✓	16,613 ✓	16,652 ✓
Landfills	6	95	102	8	180	188	6 ✓	106 ✓	112 ✓
Disposal (Destruction)	6	223	229	0	0	0	0 ✓	0 ✓	0 ✓

Total Recovered/Recycled	17,723	20,725	19,040 ✓
Total Sent to Landfills/Disposal	102	188	112 ✓
Disposal (Destruction)	229	0	0 ✓
Grand Total	18.053	20.913	19.151 ✓
Recycling Rate	98%	99.10%	99.42% ✓

Recycling Rate = (Recovery + Recycling) / (Total Waste)

Ülker Raw Material Facilities

Indicator	2023			2024			2025		
Types of Waste	Waste (tons)		Total (tons)	Waste (tons)		Total (tons)	Waste (tons)		Total (tons)
	Hazardous Waste	Non-Hazardous Waste		Hazardous Waste	Non-Hazardous Waste		Hazardous Waste	Non-Hazardous Waste	
Recovery (Energy)	0	44	44	6	337	344	7 ✓	374 ✓	381 ✓
Recovery/Recycling	23	1,738	1,761	21	1,583	1,604	26 ✓	1,710 ✓	1,735 ✓
Landfills	0	69	70	0	2	2	0 ✓	2 ✓	2 ✓
Disposal (Destruction)	0	3	3	0	0	0	0 ✓	0 ✓	0 ✓

Total Recovered/Recycled	1,806	1,947	2,116 ✓
Total Sent to Landfills/Disposal	70	2	2 ✓
Disposal (Destruction)	3	0	0 ✓
Grand Total	1,878	1,950	2,119 ✓
Recycling Rate	96%	99.88%	99.89% ✓

Recycling Rate = (Recovery + Recycling) / (Total Waste)

APPENDIX 6: Environmental Performance Indicators

Waste Data (tons)

Ülker Türkiye + Raw Material Facilities

Indicator	2023			2024			2025		
Types of Waste	Waste (tons)		Total (tons)	Waste (tons)		Total (tons)	Waste (tons)		Total (tons)
	Hazardous Waste	Non-Hazardous Waste		Hazardous Waste	Non-Hazardous Waste		Hazardous Waste	Non-Hazardous Waste	
Recovery (Energy)	2	725	727	112	4,487	4,599	21	2,748	2,769
Recovery/Recycling	84	18,718	18,801	60	18,013	18,073	64	18,323	18,387
Landfills	6	165	171	8	183	190	6	108	114
Disposal (Destruction)	6	226	232	0	0	0	0	0	0

Total Recovered/Recycled	19,528	22,672	21,156
Total Sent to Landfills/Disposal	171	190	114
Disposal (Destruction)	232	0	0
Grand Total	19,931	22,863	21,270
Recycling Rate	98%	99.17%	99.46%

Recycling Rate = (Recovery + Recycling) / (Total Waste)

Ülker Overseas Facilities

Indicator	2023			2024			2025		
Types of Waste	Waste (tons)		Total (tons)	Waste (tons)		Total (tons)	Waste (tons)		Total (tons)
	Hazardous Waste	Non-Hazardous Waste		Hazardous Waste	Non-Hazardous Waste		Hazardous Waste	Non-Hazardous Waste	
Recovery (Energy)	0	0	0	0	0	0	0	0	0
Recovery/Recycling	0	2,820	2,820	0	3,053	3,053	1	3,509	3,510
Landfills	2	1,494	1,497	1	1,781	1,782	3	1,914	1,918
Disposal (Destruction)	0	0	0	0	0	0	0	0	0

Total Recovered/Recycled	2,820	3,053	3,510
Total Sent to Landfills/Disposal	1,497	1,782	1,918
Disposal (Destruction)	0	0	0
Grand Total	4,317	4,835	5,427
Recycling Rate	65%	63%	65%

Recycling Rate = (Recovery + Recycling) / (Total Waste)

APPENDIX 6: Environmental Performance Indicators

Waste Data (tons)

Ülker Consolidated

Indicator	2023			2024			2025		
Types of Waste	Waste (tons)		Total (tons)	Waste (tons)		Total (tons)	Waste (tons)		Total (tons)
	Hazardous Waste	Non-Hazardous Waste		Hazardous Waste	Non-Hazardous Waste		Hazardous Waste	Non-Hazardous Waste	
Recovery (Energy)	2	725	727	112	4,487	4,599	21	2,748	2,769
Recovery/Recycling	84	21,538	21,621	60	21,066	21,126	65	21,832	21,897
Landfills	9	1,659	1,668	9	1,964	1,973	9	2,022	2,032
Disposal (Destruction)	6	226	232	0	0	0	0	0	0

Total Recovered/Recycled	22,348	25,725	24,666
Total Sent to Landfills/Disposal	1,668	1,973	2,032
Disposal (Destruction)	232	0	0
Grand Total	24,248	27,698	26,698
Recycling Rate	92%	93%	92%

Recycling Rate = (Recovery + Recycling) / (Total Waste)

Waste Sent for Animal Feed (tons)

	2023	2024	2025
Ülker Türkiye Facilities	7,021	6,781	6,534
Ülker Raw Material Facilities	142	195	164
Ülker Overseas Facilities	1,217	1,372	1,300
Total	**8,380**	**8,348**	**7,998**

Packaging Data (tons)

Packaging Usage	Plastic	Paper	Glass	Metal	Non-recyclable
Ülker Türkiye Facilities	16,923	48,335	245	467	-
Ülker Raw Material Facilities	136	521	-	-	-
Ülker Overseas Facilities	2,895	20,615	-	-	-
Total	19,953	69,471	245	467	-

Packaging Waste	Plastic	Paper	Glass	Metal	Composite	Wood	Total
Ülker Türkiye Facilities	2,024	4,085	7	110	242	947	7,414
Ülker Raw Material Facilities	9	745	1	5	126	448	1,334
Ülker Overseas Facilities	476	1,220	-	100	-	411	2,208
Total	2.509	6.050	8	215	368	1.806	10.956

APPENDIX 7: Social Performance Indicators

Employees by Gender and Category

Ülker Türkiye + Ülker Raw Material Facilities	2023		2024		2025	
	Female	Male	Female	Male	Female	Male
Number of out of scope employees	280	589	313	592	317 ✓	589 ✓
Number of in-scope employees	1,313	3,316	1,242	3,263	1,167 ✓	3,108 ✓
Total number of employees	5,498		5,410		5,181 ✓	

Employees by Length of Service

Ülker Türkiye + Ülker Raw Material Facilities	2023		2024		2025	
	Female	Male	Female	Male	Female	Male
Employees with 0–5 years of service	986	1,475	1,003	1,509	970	1,258 ✓
Employees with 5-10 years of service	171	740	150	523	139	596 ✓
Employees with 10 years or more of service	436	1,690	402	1,823	379	1,855 ✓

Average Employee Tenure (years)

Ülker Türkiye Facilities	2023	2024	2025
Average employee tenure (years)	8.4	8.3	9.0 ✓

Employees by Age

Ülker Türkiye + Ülker Raw Material Facilities	2023		2024		2025	
	Female	Male	Female	Male	Female	Male
Employees under 30 years old	586	821	556	818	484 ✓	687 ✓
Employees aged 30–50	909	2,959	892	2,879	888 ✓	2,811 ✓
Employees over 50 years old	98	125	107	158	112 ✓	199 ✓

Number of Employees with Disabilities by Gender

Ülker Türkiye + Ülker Raw Material Facilities	2023		2024		2025	
	Female	Male	Female	Male	Female	Male
Number of Employees with Disabilities	34	111	33	126	33 ✓	130 ✓

Employees in Senior Management by Gender, Age, and Nationality

Ülker Türkiye + Ülker Raw Material Facilities	2023		2024		2025	
	Female	Male	Female	Male	Female	Male
Under 30 years	2	11	5	19	2 ✓	2 ✓
30-50 years	14	24	69	95	75 ✓	95 ✓
Over 50 years	0	0	2	0	8 ✓	21 ✓
Total	16	35	76	114	85 ✓	118 ✓
Grand Total (Female + Male)	51		190		203 ✓	
Percentage of senior managers from different cultural backgrounds (%)	-		-		0	

Collective Bargaining Agreement Coverage

Ülker Türkiye + Ülker Raw Material Facilities	2023	2024	2025
Number of Employees Covered by Collective Bargaining Agreements	4,629	4,505	4,275 ✓
Percentage of Employees Covered by Collective Bargaining Agreements	84,2	83,3	82,8 ✓

Employees by Gender and Category – Overseas

Ülker Overseas Facilities	2024			2025		
	Female	Male	Total	Female	Male	Total
Number of out of scope employees	142	654	796	192	629	821
Number of in-scope employees	330	220	550	328	1,310	1,638
Total number of employees	472	874	1,346	520	1,939	2,459

APPENDIX 7: Social Performance Indicators

Parental Leave by Gender

Ülker Türkiye + Ülker Raw Material Facilities	2023		2024		2025	
	Female	Male*	Female	Male	Female	Male
Number of Employees on Parental Leave	43	176	12	91	31	86
Number of employees returning to work after parental leave	18	175	10	91	22	86

*There is a difference between the number of employees who take leave and those who return, as some employees' leave end dates extend into the following year.

Ülker Overseas Facilities	2024			2025		
	Female	Male	Total	Female	Male	Total
Number of Employees on Parental Leave	66	7	73	22	2	24
Number of employees returning to work after parental leave	20	7	27	0*	2	2

In our Kazakhstan operations, parental/maternity leave may be taken until the child reaches the age of 3 (up to 36 months), in accordance with local labor law.

Employee Turnover by Gender and Age

Ülker Türkiye + Ülker Raw Material Facilities	2023		2024		2025	
	Female	Male	Female	Male	Female	Male
Over 50 years	20	116	26	8	19	16
30-50 years	208	649	178	356	145	255
Under 30 years	177	368	215	297	183	242
Total	405	1,133	419	661	347	513
Grand Total (Female + Male)	1,538		1,080		860	
Employee Turnover Rate (%)	28		19		16.6	

New Hires

Ülker Türkiye + Ülker Raw Material Facilities	2023		2024		2025	
	Female	Male	Female	Male	Female	Male
Number of new hires	771	1,013	375	614	260	296

Number of Positions Filled by Internal Candidates

Ülker Türkiye + Ülker Raw Material Facilities	2023		2024		2025	
	Female	Male	Female	Male	Female	Male
Number of new hires	12	21	18	16	15	20

Employees Subject to Performance Evaluation by Gender and Category

Ülker Türkiye + Ülker Raw Material Facilities	2023		2024		2025	
	Female	Male	Female	Male	Female	Male
Number of positions filled by internal candidates	277	584	313	592	317	589

Voluntary Employee Turnover Rate (%)

Ülker Overseas Facilities	2023	2024	2025
Voluntary employee turnover rate (%)	10	10.5	5

STEM and Revenue-Generating Managerial Positions by Gender

Ülker Türkiye + Ülker Raw Material Facilities	2023		2024		2025	
	Female	Male	Female	Male	Female	Male
Number of employees in STEM positions	21	14	30	11	29	11
Number of employees in managerial positions in revenue-generating functions	22	27	28	6	28	6

APPENDIX 7: Social Performance Indicators

Diversity and Inclusion – Labor Force Distribution by Region (Gender, %)

Ülker Consolidated (Türkiye / Kazakhstan / MENA)	2023				2024				2025				Consolidated 2030 target
	Türkiye	Kazakhstan	MENA	Total	Türkiye	Kazakhstan	MENA	Total	Türkiye	Kazakhstan	MENA	Total	
Female employee rate (%)	29	63	20	30.9	28.7	60	17.8	29.8	28.6	53.2	13.5	26.2	30
Percentage of female employees in senior management positions (%)	31.4	0	6.7	23.9	34.6	50	6.8	24.2	33.3	50	36.4	31.9	35
Percentage of female employees in middle management positions (%)	34.8	66.7	7.1	30.2	42.4	43.8	0.0	37.5	34.5	26.3	14.2	21.4	25
Percentage of female employees in first-level management positions (%)	42.0	0	7.1	34.6	42.0	0	5.7	31.3	51.1	63.6	22.9	37.4	35
Percentage of female employees in all management positions (%)	37.2	13.3	7.0	30.3	40.0	45.8	6.0	29.4	41.7	43,8	19.2	30.1	35
Percentage of female executives in revenue-generating functions (%)	26.1	17.6	8.6	19.8	71.79	63.9	0	59.2	82.4	56.5	0	62.7	65
Percentage of women working in STEM (Science, Technology, Engineering, Mathematics) fields (%)	54.4	64.3	0	50.6	73.2	0	11.3	32.2	72.5	0	11.3	50.9	50

Labor Force Distribution by Region – Ethnic Origin / Nationality (Workforce, %)

Ülker Consolidated	2024	2025
Türkiye	80.51	67.8
Kazakhstan	5.86	6.2
Saudi	4.10	10.3
Egypt	2.75	11.3
Other	6.78	4.3

Labor Force Distribution by Region – Ethnic Origin / Nationality (Management, %)

Ülker Consolidated	2024	2025
Türkiye	71.13	67.2
Kazakhstan	4.58	5.2
Egypt	7.04	12.3
Saudi	3.87	13.6
Other	13.38	1.6

APPENDIX 7: Social Performance Indicators

Recruitments by Region

Ülker Consolidated (Türkiye / Kazakhstan / MENA)	2023				2024				2025			
	Türkiye	Kazakhstan	MENA	Total	Türkiye	Kazakhstan	MENA	Total	Türkiye	Kazakhstan	MENA	Total
Number of new hires	1,784	206	73	2,063	989	186	60	1,235	556	170	128	854
Number of positions filled by internal candidates	61	84	3	148	34	57	14	105	35	57	1	93
Percentage of positions filled by internal candidates (%)	3.42	40.78	4.11	7.18	3.44	30.65	23.33	8.5	6.3	33.5	0.8	10.9
Percentage of newly hired employees under 30 years old (%)	63.2	34.4	57.5	60.2	65.4	40.3	50	58.5	65.3	40.6	26.6	54.6
Percentage of newly hired employees aged 30-50 (%)	36.7	57.3	68.5	39.8	34	57.5	48.3	38.2	34.4	53.5	71.9	43.8
Percentage of newly hired employees over 50 years old (%)	0.1	8.3	1.4	1	0.6	2.2	1.7	0.9	0.4	5.9	1.6	1.6
Percentage of newly hired female employees (%)	43.2	62.6	17.8	44.2	37.9	53.2	6.7	38.7	46.8	44.1	17.2	41.8
Percentage of newly hired male employees (%)	56.8	37.4	82.2	55.7	62.1	46.8	93.3	61.3	53.2	55.9	82.8	58.2
Percentage of employees hired at senior management level (%)	0.1	0.0	2.7	0.2	0.0	0.0	1.7	0.1	0.4	1.2	0.8	0.6
Percentage of employees hired at middle management level (%)	0.0	1.0	4.1	0.2	0.2	0.5	0.0	0.2	0.4	3.5	4.7	1.6
Percentage of employees hired at first-level management level (%)	0.3	1.5	0.0	0.4	1.4	1.1	3.3	1.5	0.7	5.3	4.3	2.2
Percentage of new hires by ethnicity/nationality (%)	Turkish:100	Kazakh:100	Egyptian: 8.2 Saudi: 60.3 Filipino: 17.8 Other: 13.7	Turkish: 86.6 Kazakh: 10.0 Saudi: 2.1 Egyptian: 0.3 Other: 1.0	Turkish: 100	Kazakh: 81.72 Russian: 7.53 Turkish: 1.08 Other: 9.68	Saudi: 78.5 Egyptian: 5.5 Filipino: 10 Pakistani: 3 Canadian: 1.5 Moroccan: 1.5	Turkish: 80.3 Kazakh: 12.3 Saudi: 3.8 Egyptian: 0.2 Other: 3.4	Turkish: 100	Kazakh: 82.9 Russian: 5.9 Turkish: 2.9 Other: 8.2	-	Turkish: 77.3 Kazakh: 19.4 Russian: 1.4 Other: 1.9

Trainings

Ülker Türkiye + Ülker Raw Material Facilities	2023	2024	2025
Total training hours	1,144,172	32,024	46,365
Total training hours provided to contractors	8,170	11,048	11,620

Training Data by Region

Ülker Consolidated (Türkiye / Kazakhstan)	2024		2025	
	Türkiye	Kazakhstan	Türkiye	Kazakhstan
Average training hours per full-time employee	20.45	5.00	23	5.22
Average training expenditure per full-time employee (TRY)	3,031	210	6,187	227.14
Average training hours for employees under 30 years old	30.02	5.89	36.7	5.76
Average training hours for employees aged 30-50	28.68	2.44	28.1	4.82
Average training hours for employees over 50 years old	33.59	4.76	17.1	6.19
Average training hours for female employees	30.26	10.46	24.4	5.89
Average training hours for male employees	28.74	1.51	30.8	4.46
Average training hours for senior management	35.19	5	17	5
Average training hours for middle management	30.69	16	20.3	16
Average training hours for first-level management	29.07	53.35	21.7	24.79

APPENDIX 7: Social Performance Indicators

Occupational Health and Safety (OHS) Performance

Ülker Türkiye Facilities / Employees	2023	2024	2025
Number of fatal accidents	0	0	0
Total number of accidents	124	99	79
Number of lost time accidents	59	27	31
Lost time accident frequency rate (LTAR)	0.89	0.40	0.47
Total Incident Rate (TIR)	1.87	1.45	1.21
Occupational disease rate (ODR)	0	0	0
Accident severity rate (ASR)	1.34	0.86	0.81

Ülker Türkiye Facilities / Contractors	2023	2024	2025
Number of contractors	1,099	1,194	1.157
Number of fatal accidents	0	0	0
Total number of accidents	72	66	39
Number of lost time accidents	26	25	14
Lost time accident frequency rate (LTAR)	0.87	0.84	0.47
Total Incident Rate (TIR)	2.40	2.23	1.32
Occupational disease rate (ODR)	0	0	0
Accident severity rate (ASR)	0.50	0.71	0.17

Ülker Türkiye + Ülker Raw Material Facilities / Employees	2023	2024	2025
Number of fatal accidents	0	0	0
Total number of accidents	133	116	96
Number of lost time accidents	66	36	40
Lost time accident frequency rate (LTAR)	0.91	0.48	0.55
Total Incident Rate (TIR)	1.83	1.55	1.32
Occupational disease rate (ODR)	0	0	0
Accident severity rate (ASR)	1.26	0.89	0.89

Ülker Türkiye + Ülker Raw Material Facilities / Contractors	2023	2024	2025
Number of contractors	1,198	1,224	1,306
Number of fatal accidents	0	0	0
Total number of accidents	80	74	41
Number of lost time accidents	33	31	16
Lost time accident frequency rate (LTAR)	1.03	0.96	0.50
Total Incident Rate (TIR)	2.50	2.29	1.28
Occupational disease rate (ODR)	0	0	0
Accident severity rate (ASR)	0.46	0.72	0.17

Overseas Consolidated OHS Performance

Ülker Overseas Facilities / Egypt / Saudi Arabia / Kazakhstan (Consolidated)	2023	2024	2025
Employee – Number of fatal accidents	0	0	0
Employee – Lost time accident frequency rate (LTAR)**	0.46	0.35*	0.27
Employee – Total incident rate (TIR)	0.54	0.56	0.44
Employee – Occupational disease rate (ODR)	0.0	0	0
Contractor – Number of fatal accidents	0	0	0
Contractor – Lost time accident frequency rate (LTAR)***	-	0	0.08
Contractor – Total incident rate (TIR)	-	0	0.24
Contractor – Occupational disease rate (ODR)	0	0	0
Accident severity rate (ASR) – employee + contractor	0.37	0.17	0.15

*The 2024 overseas LTAR was reported as 0.26 in the 2024 Report on a combined employee and contractor basis. As contractor working hours with no lost-time accidents increased the combined denominator, the figure has been restated in this report as 0.35 for employees (contractors: 0.00).
**Ülker Türkiye + Raw Material Facilities + Overseas Facilities – Consolidated 2025 LTAR: 0.47
**Ülker Türkiye + Raw Material Facilities + Overseas Facilities – Consolidated LTAR for Contractors: 2025 LTAR: 0.38

APPENDIX 8: Supplier Performance Indicators

Supplier Screening

Indicators	Unit	2023	2024	2025
Total number of Tier-1 suppliers	Number	2,005	2,017	2,076
Total purchasing volume from Tier-1 suppliers	EUR	930,945,828	1,029,777,425	1,197,259,39
Geographical Distribution of Tier-1 Suppliers by Purchasing Volume	Percentage	Africa 1.72%, America 0.01%, Asia 0.17%, Europe 13.46%, Türkiye 85%	Africa 1.18%, America 0.01%, Asia 0.12%, Europe 25.75%, Türkiye 73%	Africa 0.60%, America 0.02%, Asia 0.66%, Europe 16.75%, Türkiye 81.97%
Number of local Tier-1 suppliers	Number	1,905	1,916	1,960
Share of total payments to local suppliers	Percentage	84%	70.84%	58.49%
Number of critical suppliers in Tier-1	Number	77	71	78
Share of key suppliers in total purchasing volume at Tier-1	Percentage	96%	49%*	40.27%
Number of key suppliers in Tier-2	Number	0	0	0

* In 2023, the rate decreased as our supplier Önem Gıda was incorporated into Ülker in 2024.

Supplier On-Site ESG Assessment

Indicators	Unit	2023	2024	2025
Number of suppliers assessed through on-site audits among critical suppliers	Number	25	26	29

Scope and Progress of the Supplier Assessment Program

Indicators	Unit	2023	2024	2025
Number of critical suppliers evaluated through a desk-based ESG assessment	Number	28	35	33
Number of critical suppliers assessed through on-site audits	Number	25	26	29
Total number of critical suppliers evaluated (desk-based assessment + on-site audit)	Number	53	61	62

Supplier Evaluation Findings

Indicators	Unit	2023	2024	2025
Number of suppliers identified with significant potential negative impact and supported with a corrective action plan	Number	5	7	8
Number of suppliers identified with significant potential negative impact and whose cooperation was terminated	Number	0	0	0

Supplier Development Programs

Indicators	Unit	2023	2024	2025
Number of suppliers participating in capacity-building programs	Number	274	275	276
ESG-related findings from the assessment of critical Tier-1 suppliers	Number	N/A	254	388
Improved ESG-related findings from the assessment of critical Tier-1 suppliers	Number	N/A	102	138
ESG training provided to suppliers	person*hour	N/A	628	504
ESG training provided to procurement, R&D, and quality teams	person*hour	N/A	60	99

APPENDIX 9: Human Rights Risk Assessment

	Management Approach	Scope of Assessment	Actions Taken
Own operations - internal processes	Our HR Department's specialized Human Rights team regularly conducts Human Rights and Environmental Due Diligence (HREDD) processes through both internal audits and independent third-party assessments, in alignment with the six steps of the OECD Due Diligence Guidance for Responsible Business Conduct. As a result of these activities, a risk map covering potential and actual violations is created, and necessary preventive and corrective actions are implemented in line with our Human Rights Policy. The Ülker Human Rights Committee convenes four times a year to systematically and periodically review and update the risk map. The Committee addresses human rights risks that may arise in existing and new business relationships and also incorporates the assessment of potential risks across different layers of our value chain. We exercise the utmost diligence to ensure full compliance with local and national regulations in all the countries where we operate. All our contracts are drawn up in accordance with applicable legal regulations and ensure full compliance with the human rights standards of the relevant country. Findings from internal and external audit processes are reviewed by the Human Rights Committee, and corrective action plans developed based on these findings are implemented together with the necessary preventive measures.	These audits cover a wide range of areas, including social governance systems, employee engagement, freedom of association and collective bargaining, prevention of discrimination, fair compensation, decent working hours, occupational health and safety, prevention of precarious employment, elimination of forced and child labor, environmental protection, and ethical conduct. The groups assessed in terms of human rights risks include our employees, women, children, migrant workers, third-party workers, and local communities. We assess the countries in which we operate according to their human rights risk levels and identify priority sites for more detailed human rights impact assessments, taking into account factors such as labor-intensive operations, the employment of migrant workers, and the presence of vulnerable groups such as ethnic minorities, women, or young workers.	In 2025, all our facilities underwent human rights assessments conducted either by the internal audit team of Yıldız Holding, the parent company of Ülker Bisküvi, or through internal processes. Preventive action plans have been developed for the risks identified at our facilities. No serious human rights violations have been identified in our operations. Through our ethics hotline, a total of 33 reports were received across our operations in Türkiye, Saudi Arabia, Kazakhstan, and Egypt, and all reported cases were resolved. The following preventive measures have been implemented to resolve the issues: • Guidance documents on the relevant procedures have been placed in a visible location next to the complaint box. • ●An effective risk mapping process has been conducted in relation to compliance matters. • Ülker Bisküvi employees have been provided with basic ethics training covering human rights issues such as anti-corruption, anti-bribery, and anti-discrimination. In this context, 191 employees received basic ethics training, amounting to a total of 287 person*hours. In addition, 223 employees received 223 hours of training on the Law on the Protection of Personal Data.
Own operations - external audit processes	We are regularly audited under the Business Social Compliance Initiative (BSCI) and the Suppliers Ethical Data Exchange (SEDEX). In addition, comprehensive customer audits with international recognition are conducted upon request.		BSCI and SEDEX audits have confirmed that no fundamental human rights violations were identified in our operations.
Value chain	Our primary focus in the value chain is assessing human rights risks associated with Tier-1 suppliers. We prioritize our suppliers and operational sites according to the risk level (high, medium, or low) identified through the assessment, and determine the intensity of our actions and resource allocation in proportion to this prioritization. In line with our zero-tolerance policy, we reserve the right to suspend or terminate procurement contracts with suppliers found to be involved in human rights violations.		In 2025, 62 critical Tier-1 suppliers were assessed in relation to issues such as management systems, employee engagement, freedom of association and collective bargaining, prevention of discrimination, fair compensation, decent working hours, occupational health and safety, prevention of precarious employment, elimination of forced and child labor, environmental protection, and ethical conduct; 33 were evaluated through desk-based ESG assessments and 29 through on-site social and environmental compliance audits. For the 8 suppliers identified as having significant potential negative impacts, a maturity level was assigned based on the assessment results and time-bound corrective action plans were developed; no supplier relationships were terminated. We aim to achieve continuous improvement in our suppliers' social compliance processes. In line with this goal, we have introduced various training programs. Supplier training is designed to equip suppliers with comprehensive knowledge and awareness of Ülker's ESG strategy, policies, and procedures. As part of the online training, information is provided on the Ülker and pladis Supplier Code of Conduct, the Ülker Supplier ESG Program, and key ESG areas such as ethics and human rights, along with the prevention of bribery and corruption. The training program comprises online webinars and technical consulting services organized by Ülker in collaboration with independent third-party consultants. In 2025, the total duration of training provided to our suppliers amounted to 504 person*hours. As child labor can pose a systemic risk in agricultural supply chains with low levels of mechanization, such as cocoa, we implement a dedicated child labor monitoring and remediation approach in addition to our responsible sourcing practices. As part of our Beyond Cocoa project, 4,520 cocoa farming families in Côte d'Ivoire were visited on-site to assess issues such as child labor, working conditions, fair pay, and forced labor. As of the end of 2025, no serious nonconformities were identified during these visits. In addition, a mobile health campaign focused on the early diagnosis of potential diseases and women's health was organized across three communities of the SCOOPS DAKUA cooperative, reaching 2,440 people.
New business relations	The same procedures are applied to new business relationships (mergers, acquisitions, joint ventures, etc.).		No new business relationships were established by the end of 2025. The same procedures will be applied in future business activities as well.

APPENDIX 10: Sustainability Platform Competencies

Business Unit and Manager	Sustainability Platform Experiences and Competencies
Human Resources	Talent management, employee engagement and motivation, equal opportunities and diversity, sustainable business culture, business continuity, training, ethics and compliance, employee rights, data security
Production	Sustainable business culture, risk analysis and management, climate crisis, resource efficiency and waste reduction, energy management, CO●emissions and waste management, water and wastewater management, business continuity, innovative business practices, quality management systems, balanced nutrition, sustainable packaging
Procurement	Sustainable business culture, risk analysis and management, environmental, social, and governance (ESG) assessments and traceability in the supply chain, local sourcing and development, deforestation verification in raw material procurement, innovative business practices, sourcing raw materials from locations close to production facilities, sourcing critical raw materials for balanced nutrition products, business continuity, innovative practices in agricultural raw materials, climate crisis, and resource efficiency
R&D	Sustainable business culture, innovative business practices, climate crisis, resource efficiency and waste reduction, balanced nutrition, partnerships and corporate relations, customer satisfaction and loyalty, sustainable packaging
Investor Relations and Finance	Sustainable business culture, risk analysis and management, partnerships and corporate relations, sustainability indices, financial and non-financial risks
Logistics	Sustainable business culture, risk analysis and management, environmental, social, and governance (ESG) assessments and traceability in the supply chain, innovative business practices, route optimization and efficiency, climate crisis, resource efficiency and waste reduction, business continuity
Marketing	Sustainable business culture, innovative business practices, balanced nutrition, partnerships, customer satisfaction and loyalty, business continuity
Corporate Communication	Corporate social responsibility and local development, balanced nutrition, partnerships and corporate relations, sustainability communications, promoting a sustainability culture within and outside the organization
Quality	Sustainable business culture, risk analysis and management, innovative business practices, balanced nutrition, customer satisfaction and loyalty, business continuity, innovative practices in agricultural raw materials, environmental, social, and governance (ESG) assessments and traceability in the supply chain, food safety and quality management systems
Operational Excellence	Sustainable business culture, risk analysis and management, innovative business practices, climate crisis, resource efficiency and waste reduction, business continuity, digital transformation, energy management
OHS	OHS inspections, management and reduction of occupational accidents, OHS culture initiatives, risk analysis and management, innovative business practices, partnerships and corporate relations, business continuity, quality management systems, digitalization in OHS processes, machine risk assessments, emergency and crisis management
Environment and Energy	Sustainable business culture, climate crisis, resource efficiency and waste management, energy management, emissions, water and wastewater management, non-financial risk analysis and management, environmental, social, and governance (ESG) assessments and traceability in the supply chain, corporate social responsibility and local development, innovative business practices, partnerships and corporate relations, business continuity, innovative practices in agricultural raw materials, quality management systems
Corporate Risk Management	Systematic identification, assessment, and prioritization of sustainability and climate-related risks across the company, monitoring of non-financial risks, integration of ESG risks into the corporate risk inventory, and reporting these risks at the board level.

APPENDIX 11: GRI Content Index

Declaration of Use	**Ülker Bisküvi A.Ş. has reported the information specified in this GRI Content Index for the period January 1, 2025 – December 31, 2025, with reference to the GRI Standards.**
GRI 1 was used	**GRI 1: Foundation 2021**

GRI Standard	Disclosures	Page Number, Source, and/or Direct Reference	Additional Information and Reasons for Omission
General Disclosures			
GRI 2: General Disclosures 2021	2-1 Organizational details	3-4	
	2-2 Entities included in the organization's sustainability reporting	4	
	2-3 Reporting period, frequency, and contact point	3-4	
	2-4 Restatements of information	195	
	2-5 External assurance	4, 206-208	
	2-6 Activities, value chain and other business relationships	13	
	2-7 Employees	191	
	2-8 Workers who are not employees	191-192	
	2-9 Governance structure and composition	29-31, 36	
	2-10 Nomination and selection of the highest governance body	33	
	2-11 Chair of the highest governance body	31	
	2-12 Role of the highest governance body in overseeing the management of impacts	34-36	
	2-13 Delegation of responsibility for managing impacts	34-36	
	2-14 Role of the highest governance body in sustainability reporting	34-36	
	2-15 Conflicts of interest	Corporate Governance Compliance Report	
	2-16 Communication of critical concerns	18, 34	
	2-17 Collective knowledge of the highest governance body	33	
	2-18 Evaluation of the performance of the highest governance body	Corporate Governance Compliance Report	
	2-19 Remuneration policies	Remuneration Policy	
	2-20 Process to determine remuneration	Remuneration Policy	
	2-21 Annual total compensation ratio	-	Not disclosed due to confidentiality.

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GRI Standard	Disclosures	Page Number, Source, and/or Direct Reference	Additional Information and Reasons for Omission
General Disclosures			
GRI 2: General Disclosures 2021	2-22 Statement on sustainable development strategy	14-18	
	2-23 Policy commitments	14-18	
	2-24 Embedding policy commitments	14-18	
	2-25 Processes to remediate negative impacts	22-28	
	2-26 Mechanisms for seeking advice and raising concerns	50-52	
	2-27 Compliance with laws and regulations	52	
	2-28 Membership associations	30, 170	
	2-29 Approach to stakeholder engagement	17-19, 171-173	
	2-30 Collective bargaining agreements	191	
Material Topics			
GRI 3: Material Topics 2021	3-1 Process to determine material topics	19-21	
	3-2 List of material topics	21	
Economic Performance			
GRI 3: Material Topics 2021	3-3 Management of material topics	22-28	
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	25, 196	
Anti-Corruption			
GRI 3: Material Topics 2021	3-3 Management of material topics	54	
GRI 205: Anti-corruption 2016	205-3 Confirmed incidents of corruption and actions taken	52, 54	
Materials			
GRI 3: Material Topics 2021	3-3 Management of material topics	82-84	
GRI 301: Materials 2016	301-1 Materials used by weight or volume	82, 190	
Energy			
GRI 3: Material Topics 2021	3-3 Management of material topics	61-69	
GRI 302: Energy 2016	302-1 Energy consumption within the organization	182	
	302-3 Energy intensity	68	
	302-4 Reduction of energy consumption	65, 67, 86	
Water and Effluents			
GRI 3: Material Topics 2021	3-3 Management of material topics	72-78	
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	72-73	
	303-2 Management of water discharge-related impacts	75, 78	
	303-3 Water withdrawal	73-75, 187	
	303-4 Water discharge	75, 187	

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GRI Standard	Disclosures	Page Number, Source, and/or Direct Reference	Additional Information and Reasons for Omission
Emissions			
GRI 3: Material Topics 2021	3-3 Management of material topics	61-65	
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	183	
	305-2 Energy indirect (Scope 2) GHG emissions	183	
	305-3 Other indirect (Scope 3) GHG emissions	184-185	
	305-4 GHG emissions intensity	64	
	305-5 Reduction of GHG emissions	62-63, 66, 69	
Waste			
GRI 3: Material Topics 2021	3-3 Management of material topics	79-81	
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	79-81	
	306-2 Management of significant waste-related impacts	79-81	
	306-3 Waste generated	188-190	
	306-5 Waste directed to disposal	188-190	
Supplier Environmental Assessment			
GRI 3: Material Topics 2021	3-3 Management of material topics	129-132	
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	129, 132	
Employment			
GRI 3: Material Topics 2021	3-3 Management of material topics	142-145	
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	192-193	
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	148-151	
	401-3 Parental leave	192	
Occupational Health and Safety			
GRI 3: Material Topics 2021	3-3 Management of material topics	156-160	
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	156, 158	
	403-2 Hazard identification, risk assessment, and incident investigation	157	
	403-3 Occupational health services	158-159	
	403-4 Worker participation, consultation, and communication on occupational health and safety	156-157	
	403-5 Worker training on occupational health and safety	159	
	403-6 Promotion of worker health	158-159	

APPENDIX 11: GRI Content Index

GRI Standard	Disclosures	Page Number, Source, and/or Direct Reference	Additional Information and Reasons for Omission
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	160	
	403-8 Workers covered by an occupational health and safety management system	156, 158	
	403-9 Work-related injuries	195	
	403-10 Work-related ill health	195	
Training and Education			
GRI 3: Material Topics 2021	3-3 Management of material topics	146-147	
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	147, 194	
	404-2 Programs for upgrading employee skills and transition assistance programs	142-147	
	404-3 Percentage of employees receiving regular performance and career development reviews	143, 192	
Diversity and Equal Opportunity			
GRI 3: Material Topics 2021	3-3 Management of material topics	141	
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	189, 191, 193	
Customer Health and Safety			
GRI 3: Material Topics 2021	3-3 Management of material topics	126-128	
GRI 416: Customer Health and Safety 2016	416-1 Assessment of the Health and Safety Impacts of Product and Service Categories	126-128	

APPENDIX 12: TCFD Index

Thematic Area	Recommended Disclosures	Reference
Governance Disclose the organization's governance structure regarding climate-related risks and opportunities.	a. Describe the Board's oversight of climate-related risks and opportunities.	36-38
	b. Describe management's role in assessing and managing climate-related risks and opportunities.	37-38
Strategy Disclose the actual and potential impacts of climate-related risks and opportunities on the organization's activities, strategy, and financial planning.	a. Describe the climate-related risks and opportunities the organization has identified for the short, medium, and long term.	41-46
	b. Describe the impact of climate-related risks and opportunities on the organization's activities, strategy, and financial planning.	41-46, 60-69
	c. Describe the resilience of the organization's strategy, considering different climate-related scenarios, including a scenario where global warming is limited to 2°C or below.	**Ülker TSRS-Compliant Sustainability Report**, p. 37-50
Risk Management Disclose how the organization identifies, assesses, and manages climate-related risks.	a. Describe the organization's processes for identifying and assessing climate-related risks.	37-38, 40
	b. Describe the organization's processes for managing climate-related risks.	37-38, 40
	c. Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management.	37-38
Metrics and Targets Disclose the metrics and targets used to assess and manage relevant climate-related risks and opportunities.	a. Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.	60-69
	b. Disclose Scope 1, Scope 2, and if relevant, Scope 3 greenhouse gas emissions, and the related risks.	183-185
	c. Describe the targets used by the organization to manage climate-related risks and opportunities, and performance against these targets.	60-63, 66

APPENDIX 13: Glossary of Terms

5S Approach: A technique aimed at improving working conditions in terms of performance, comfort, safety, and cleanliness.

Six Sigma Approach: A data-driven management strategy that aims to achieve operational excellence by measuring and improving process performance to reduce defects and variability and enhance quality.

European Union Green Deal: A comprehensive climate and sustainability strategy announced by the European Union in 2019.

Bloomberg Gender Equality Index: An index that measures companies' performance on gender equality and promotes transparency in this area.

BRC (British Retail Consortium): An organization that develops and oversees international standards aimed at ensuring food safety and quality for organizations operating in the food and consumer products industries.

BRCGS (Brand Reputation through Compliance Global Standards): Set of standards used to ensure food safety, product quality, and process compliance, particularly in the retail sector.

BREEAM (Building Research Establishment Environmental Assessment Method):A green building certification system that assesses the environmental performance of buildings and rates their sustainability levels.

CDP (Carbon Disclosure Project): The Carbon Disclosure Project is an initiative that enables companies, investors, and public institutions to report and share environmental data related to climate change.

Double Materiality: An approach that assesses both a company's financial performance and the environmental, social, and governance (ESG) impacts of its activities.

Value Chain: A business model that encompasses all stages of a product or service, from sourcing raw materials through production, distribution, marketing, sales, and final delivery to consumers.

Distributor: An intermediary business that stores and markets products purchased from manufacturers or suppliers and delivers them to end users.

Circular Economy: An economic model that seeks to minimize waste and use resources sustainably by recycling materials as much as possible.

EUTR (European Union Timber Regulation): The European Union Timber Regulation (EUTR) entered into force in 2013 with the aim of promoting the sustainable use of forest resources in the European Union and preventing the import of illegally harvested timber products.

G20 Women's Empowerment Manifesto: A commitment and policy document adopted by the G20 countries to enhance women's economic participation, employment, and leadership roles.

GWP (Global Warming Potential Values): A metric that measures how much heat a greenhouse gas traps in the atmosphere over a specific period of time, using carbon dioxide (CO_2) as the reference gas. The GWP of CO_2 is defined as 1.

Halal Certification: A halal certificate is a document that verifies that a product or service is produced and provided in compliance with Islamic law.

I-REC (International Renewable Energy Certificate): A certification system developed by the International REC Standard Foundation is used to verify and track the amount of electricity generated from renewable energy sources.

IPCC (Intergovernmental Panel on Climate Change): It is an international organization that provides guidance to policymakers by conducting scientific assessments on climate change.

ISO 22000: Food Safety Management System Standard. It enables businesses in the food chain to identify, control, and manage food safety risks.

ISO 45001 Occupational Health and Safety Management Systems Standard: It enables businesses to continuously improve their occupational health and safety performance.

ISO 9001 Quality Management Systems Standard: It ensures that businesses deliver quality products and services that meet customer needs.

Scope 1 Emissions: It refers to emissions under the direct control of an organization.

Scope 2 Emissions: These indirect emissions result from the company's energy consumption.

Scope 3 Emissions: Emissions refer to indirect greenhouse gas emissions generated from processes outside the organization's own operations, such as those arising from the supply chain, customer use, and waste management.

Carbon Footprint: Carbon footprint refers to the amount of greenhouse gases, particularly carbon dioxide (CO_2), emitted into the atmosphere as a result of an individual, organization, or product.

Compost: An organic fertilizer formed by the aerobic decomposition of plant and animal waste under moist and oxygen-rich conditions.

LCA (Life Cycle Assessment): Life Cycle Assessment, is a method used to evaluate the environmental impacts, resource efficiency, and waste generation of a product throughout all stages of its life cycle (material extraction, production, distribution, use, and disposal).

APPENDIX 13: Glossary of Terms

OECD Guidelines for Multinational Enterprises: These principles, adopted by the OECD (Organisation for Economic Co-operation and Development), provide a framework that guides multinational enterprises in managing their economic, social, and environmental impacts and promotes fair and sustainable business practices.

Pesticide: Chemical or biological substances used to control or eliminate harmful organisms (such as insects, fungi, or weeds). They are widely used in agriculture, horticulture, and the health sector. However, misuse or excessive use can lead to environmental and health risks.

Science Based Targets initiative (SBTi): It encourages companies to set scientifically grounded and credible commitments to reduce greenhouse gas emissions.

Sustainable Agriculture: The implementation of agricultural practices in accordance with sustainability principles across environmental, economic, and social dimensions.

TCFD (Task Force on Climate Related Financial Disclosures): It aims to encourage companies to disclose and report climate-related financial risks and opportunities in a transparent and understandable manner.

Türkiye Food Innovation Platform: A platform that aims to enhance the innovation capacity, competitiveness, and sustainable growth of the food sector in Türkiye.

Federation of Food & Drink Industry Associations of Türkiye: A federation uniting association in the food and beverage sector in Türkiye, represents the common interests of the sector, monitors industry developments, and coordinates sustainability efforts across the industry.

TÜSİAD Environment and Climate Change Working Group: A working group operating within the Turkish Industry and Business Association (TÜSİAD) that aims to promote environmental sustainability practices in the business community, support knowledge sharing, and develop policy recommendations.

National Food and Beverage Alliance Türkiye Commitment Statement: A joint commitment by companies in Türkiye's food and beverage sector, focusing on sustainability and healthy nutrition.

WCF (World Cocoa Foundation): The World Cocoa Foundation (WCF) is an international organization that works with farmers and communities in cocoa-producing countries to promote environmental, social, and economic sustainability throughout the cocoa supply chain.

WEPs (Women's Empowerment Principles): The Women's Empowerment Principles (WEPs), developed by the United Nations Global Compact and UN Women, are a set of principles aimed at promoting gender equality and the empowerment of women in the business world.

World Resources Institute (WRI): An international think tank that promotes the sustainable use of natural resources, supports action on climate change, and collaborates with stakeholders to advance sustainable development.

WWF: World Wide Fund for Nature

Lean Production: A production system in which defects, costs, inventory, labor, waste, and customer dissatisfaction are minimized.

Green Building: Building design and construction that aim to reduce environmental impact through the efficient use of energy, water, and other resources.

Zero Waste to Landfill Certification: A certification demonstrating that a company manages its waste without sending it to landfill and demonstrates the company's achievement of resource recovery.

APPENDIX 14: Limited Assurance Report

Deloitte.

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LIMITED ASSURANCE REPORT

DRT Bağımsız Denetim ve SMMM A.Ş. ("Deloitte") independent auditor's limited assurance report to the Board of Directors of Ülker Bisküvi Sanayi A.Ş. ("Company") and its subsidiaries (together referred to as "Group") on the 2025 Sustainability Report for the year ended 31 December 2025.

Scope of Limited Assurance Engagement

We have been engaged to perform a limited assurance engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised) and Assurance Engagements on Greenhouse Gas Statements (ISAE) 3410 ("Standards") on whether the Selected Sustainability Information listed below (the "Selected Information") in the Group's Sustainability Report for the year ended 31 December 2025 (the "2025 Sustainability Report") has been prepared in accordance with the principles set out in the Reporting Guidance section of the Group's Annual Report on pages 177-181.

Our assurance engagement does not cover information related to previous periods, other information included in the 2025 Sustainability Report, or Sustainability Information or any other information related to the 2025 Sustainability Report (including any images, audio files, documents embedded in a website or embedded videos).

Selected non-financial performance data for limited assurance

We have been engaged by the Group to perform limited assurance procedures on the accuracy of the following key performance indicators included in the 2025 Sustainability Report for the year ended 31 December 2025. The scope of the indicators ✓ subject to limited assurance procedures and found on pages 182-195 marked with an of the 2025 Sustainability Report for the year ended 31 December 2025 is as follows:

Environmental Indicators

- Total Energy Consumption (MWh & GJ)
- Buildings (Fuel – Electricity) (MWh)
- Purchased Electricity (MWh)
- Vehicle Fuels (MWh)
- Diesel (MWh)
- Gasoline (MWh)
- Natural Gas (MWh)
- LNG (MWh)
- Generator (MWh)
- LPG (MWh)
- Renewable Energy (MWh)
- Scope 1 (CO_2, CH_4, N_2O) (tons CO_2)
- Scope 2 (tons CO_2) (Location-based and Market-based)
- Total Scope 1 and Scope 2 (tons CO_2)
- Total Scope 1, 2, and 3 (tCO_2e)
- Total Scope 3 (tCO_2e)
- Total Scope 1 and 2 (tCO_2e)
- Hazardous, Non-hazardous, and Total Waste by Disposal Method (tons)
- Recycling Rate (%)
- Total Water Withdrawal (m^3)
- Municipal Water (m^3)
- Groundwater (m^3)
- Rainwater and Wastewater Recovery (m^3)
- Water Intensity (m^3)
- Wastewater Volume (m^3)
- Water Consumption (m^3)

APPENDIX 14: Limited Assurance Report

Social Indicators

- Employees by Gender and Category (#)
- Age Distribution of Employees in Senior Management Bodies (#)
- Number of Employees Taking Parental Leave (#)
- Number of Employees Returning to Work After Parental Leave (#)
- Number of Employees with Disabilities by Gender (#)
- Employees Leaving the Company by Gender and Age (#)
- Employees by Length of Service and Gender (#)
- Total Training Hours (hours)
- Number of Employees Covered by Collective Bargaining Agreements (#)
- Number of Fatalities (#)
- Lost Time Accident Rate (LTAR)
- Occupational Disease Rate (ODR)
- Accident Severity Rate (ASR)

Structural constraints

All assurance engagements have inherent limitations due to the selective testing of the information under review. Fraud, error or non-compliance may therefore occur and not be detected. In addition, non-financial information, such as non-financial information contained in reporting documents, is subject to more structural limitations than financial information, given the nature and methods used to identify, calculate and sample or estimate such information.

Our assurance engagement provides limited assurance as defined in ISAE 3000 (Revised) and (ISAE) 3410 ("Standards"). The procedures performed as part of a limited assurance engagement differ in nature and timing - and to a lesser extent - from a reasonable assurance engagement. The level of assurance obtained in a limited assurance engagement is therefore significantly narrower than the scope of a reasonable assurance engagement.

Special Purpose

Our work has been undertaken to inform the Group's Board of Directors of the matters we are required to report in this report and for no other purpose. To the extent permitted by law, we accept no responsibility to any person or entity other than the Group's Board of Directors for the assurance audit we have conducted or the conclusion we have reached.

Our Independence and Competence

We comply with the independence and other ethical provisions of the Code of Ethics for Accounting Professionals published by the International Ethics Standards Board for Accounting Professionals, which sets out the basic principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior. We apply the International Standard on Quality Management 1 (ISQM 1) and accordingly maintain a robust system of quality control, including policies and procedures that document compliance with relevant ethical and professional standards and requirements in laws or regulations.

Responsibilities of Management

The Group Management is responsible for the preparation, accuracy and completeness of the sustainability information and statements in the report. The Group Management is responsible for setting the Group's sustainability goals, establishing and maintaining appropriate performance management and internal control systems from which the reported information is derived.

Responsibilities of the Practitioner

Our responsibility is to reach a conclusion on the Selected Information based on our procedures. We conducted our limited assurance engagement in accordance with International Standards on Assurance Engagements and, in particular, International Standard on Assurance Engagements (ISAE 3000) (Revised) and Assurance Engagements on Greenhouse Gas Statements (ISAE 3410) on Assurance Engagements Other than Independent Audits.

The assurance engagement performed represents a limited assurance engagement. The nature, timing and extent of the procedures performed in a limited assurance engagement are limited compared to those required in a reasonable assurance engagement. As a result, the level of assurance obtained in a limited assurance engagement is lower.

Our Key Assurance Procedures

We carried out limited assurance on the accuracy of the selected key performance indicators specified below in the section "Selected non-financial performance data for limited assurance" related to 2025 year and included into the Report.

APPENDIX 14: Limited Assurance Report

To achieve limited assurance, the ISAE 3000 (Revised) and (ISAE) 3410 ("Standards") requires that we review the processes, systems and competencies used to compile the areas on which we provide our assurance. Considering the risk of material error, we planned and performed our work to obtain all of the information and explanations we considered necessary to provide sufficient evidence to support our assurance conclusion.

To form our conclusions, we undertook the following procedures:

- Analyzed on a sample basis the key systems, processes, policies and controls relating to the collation, aggregation, validation and reporting processes of the selected sustainability performance indicators;
- Made inquiries with employees of the Group responsible for sustainability performance, policies and corresponding reporting;
- Performed selective substantive testing to confirm the accuracy of received data to the selected key performance indicators;
- Made inquiries of management and senior executives to obtain an understanding of the overall governance and internal control environment, risk management, materiality assessment and stakeholder engagement processes relevant to the identification, management and reporting of sustainability issues; and

We believe that our evidence obtained is sufficient and appropriate to provide a basis for our limited assurance conclusion.

Limited Assurance Conclusion

Based on our work and the assurance procedures performed, nothing has come to our attention that causes us to believe, in our opinion, that the Selected Information referred to above in the Group's 2025 Sustainability Report for the year ended 31 December 2025, for which we were engaged to provide limited assurance, has not been prepared, in all material respects, in accordance with the Reporting Manual, as described in the "Auditor's Responsibilities" section above.

Restrictions on Use

This Report, including the conclusion, has been prepared for the Board of Directors of Ülker Bisküvi Sanayi A.Ş. to assist in reporting the Group's performance and activities related to the Selected Information. We hereby authorize the inclusion of this report in the Sustainability Report prepared for the year ending 31 December 2025, to enable Ülker Bisküvi Sanayi A.Ş. Board of Directors to demonstrate that it has fulfilled its responsibilities by preparing an independent limited assurance report on Selected Information. Except to the extent permitted by law and in cases where prior written approval has been obtained and expressly agreed upon, we do not accept or assume any responsibility to anyone other than the Board of Directors of Ülker Bisküvi Sanayi A.Ş. and Ülker Bisküvi Sanayi A.Ş. in connection with the work we have performed or the report we have prepared.

DRT BAĞIMSIZ DENETİM VE SERBEST MUHASEBECİ MALİ MÜŞAVİRLİK A.Ş.
Member of **DELOITTE TOUCHE TOHMATSU LIMITED**



Ömer Yüksel
Partner

İstanbul, 14 September 2026

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