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1. Purpose

Tiryaki Holding A.Ş. ("Group" or "Tiryaki") is a global player in the agricultural supply chain and a leading group of companies in the countries where it operates. With the motto "Good People, Fertile Soils", it aims to provide nutritional solutions worldwide and build a food future in harmony with nature.

Tiryaki is committed to adopting honest, fair, ethical, and sustainable working principles in all its activities and ensures compliance with applicable laws, regulations, international treaties, and international standards across all jurisdictions in which it operates.

This Ethics and Compliance Policy ("Policy") has been prepared to reflect Tiryaki's commitment to conducting its operations within the framework of ethical values and compliance standards.

2. Scope

This Policy applies to all direct and indirect subsidiaries of Tiryaki, including all their executives, directors, and employees ("Tiryaki Employees"), and all consultants acting on behalf of Tiryaki, as well as suppliers, customers, and other third parties in a commercial relationship with Tiryaki ("Tiryaki Stakeholders").

Tiryaki Employees and Tiryaki Stakeholders are expected to carry out all activities in compliance with the rules set out in this Policy. Tiryaki's direct and indirect subsidiaries must also establish sub-policies based on these main rules and by harmonizing them with their own country legislation.

3. Management Declaration

Tiryaki and Tiryaki Employees conduct all operations transparently, fairly, and in compliance with legal and ethical standards. Tiryaki Stakeholders are also expected to act within this framework.


Tiryaki is a global business group that takes swift, rational, and bold decisions and embraces innovation. Even within this dynamic business approach, Tiryaki never compromises on its commitment to comply with all national and international laws, regulations, standards, and ethical principles.

Tiryaki has developed relevant policies and procedures based on comprehensive analyses, and Tiryaki Employees are obliged to comply with these regulations.

4. Our Values and Principles

"A person who keeps busy becomes useful to themselves and their family. A body and a mind that are idle decay. While working, you must not act blindly, you must use your mind, keep your

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eyes and ears open. You must research what others have done in your field. If one way doesn't work, you must try another."* —Our Founder, Ali Tiryakioğlu

Tiryaki continues to uphold the values embraced by its founder Ali Tiryakioğlu at the beginning of his journey across every link of its supply chain spanning four continents, adding new values to these foundations as it grows. Tiryaki is committed to preserving its entrepreneurial spirit and innovation-oriented vision, working diligently, taking calculated risks, and staying true to the values of justice and integrity. Tiryaki always operates with awareness of its responsibilities toward the environment and people. In doing so, it never compromises on courtesy, loyalty to its employees and stakeholders, or dedication to its mission.

These values, inspired by Tiryaki's story, shape the company's approach to conducting business. This Policy was prepared based on those values to define our principles of conduct. Tiryaki Employees and Stakeholders are expected to act in alignment with these values and adhere to the principles outlined below.

4.1. Compliance with National and International Laws and Sanctions

Tiryaki is committed to managing its supply chain ecosystem, including suppliers, customers, and business partners, in compliance with all legal requirements. To this end, it adheres to all relevant national and international legislation, standards, sanctions regulations, and export control rules, including but not limited to those issued by the United Nations, United Kingdom, European Union, and the United States.

Tiryaki Employees must follow this compliance policy in all operations. For every new or existing customer and/or supplier (including parties to which goods are "sold," "shipped," "invoiced," or which make "payments"), Tiryaki conducts Know Your Customer (KYC) or Know Your Supplier due diligence procedures and ensures all Tiryaki processes comply with applicable sanctions and export control laws.

Additionally, intermediary banks evaluate counterparties in sanctioned jurisdictions.


Tiryaki Employees are responsible for managing all processes in accordance with the Global Trade Compliance Procedure and for taking the necessary measures to prevent any non-compliance.

4.2. Zero Tolerance for Corruption, Bribery, and Money Laundering

"Doing your job well is a matter of personal honor. The type of work doesn't matter—it's how you do it. That's how you earn respect." —Our Founder, Ali Tiryakioğlu

Tiryaki has adopted a zero-tolerance approach to money laundering, bribery, terrorist financing, and corruption. In order to safeguard its own reputation and that of Tiryaki Employees and

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Stakeholders, it adheres to the separately issued Zero Tolerance Policy on Bribery and Corruption in all operations.

Tiryaki Employees and Stakeholders are required to comply with all applicable regulations and policies published by Tiryaki, including international laws and standards related to these crimes.

4.3. Fair Competition and Compliance with Competition Law

"When doing business, you should care about your counterpart as much as you care about yourself. If someone suffers a loss working with you, will they want to work with you again?" — Our Founder, Ali Tiryakioğlu

Tiryaki believes in a fair commercial environment and justice among equals. Accordingly, it complies with all applicable national and international competition laws and rejects any unlawful agreements that restrict, distort, or hinder competition.

Tiryaki evaluates risks related to antitrust issues in all operations and ensures compliance. Tiryaki Employees and Stakeholders must carry out their business activities in accordance with all applicable competition rules.

4.4. Healthy and Safe Working Environment

"Working with good people brings peace; their goodness reflects on you and your work." —Our Founder, Ali Tiryakioğlu

Tiryaki provides a healthy and safe working environment for its Employees. To this end, Tiryaki does not compromise on compliance with all national and international regulations and standards related to labor law and occupational safety.

Tiryaki provides all employees with a respectful, dignified, and courteous work environment. Any acts that may be considered harassment, violence, or threats are strictly prohibited in Tiryaki's work environment.

Tiryaki rejects all forms of discrimination. In Tiryaki's ecosystem, no one shall be discriminated against based on origin, gender, religion, or other personal attributes.

Tiryaki Employees must avoid any actions that may compromise the health and safety of the work environment and must comply with the rules set out in the Group Disciplinary Policy. Tiryaki Stakeholders are equally responsible for fostering a safe, fair, and human rights-compliant working environment.

4.5. Transparency and Prevention of Conflicts of Interest

"I have always believed in goodwill and honest work; this has always been my perspective." — Our Founder, Ali Tiryakioğlu

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Tiryaki prohibits Tiryaki Employees from acting in any way contrary to their duty of loyalty. Tiryaki Employees must avoid any relationship that creates an actual or perceived conflict of interest between their personal interests and those of the company, including situations that affect impartiality or offer material or moral benefit to themselves or close relations.

In the event of a potential conflict, Tiryaki Employees are required to report it immediately to their direct manager, Human Resources, or compliance@tiryaki.com.tr and to act in accordance with the detailed procedures outlined in the Conflict of Interest Policy.

4.6. Protection of Tiryaki's Assets and Confidential Information

All information, documentation, technical know-how, trade secrets, intellectual property rights (such as trademarks and patents), and all operational, project, or process-related content acquired within the scope of Tiryaki's activities are considered Confidential Information.

Confidential Information belonging to Tiryaki or third parties may not be shared with any third party, except for information that may be shared in accordance with the relevant legal regulations or information that is publicly available.

The principle of confidentiality also applies to the personal data of Tiryaki Employees, Tiryaki Stakeholders and other people, and all processes such as processing, storage and sharing of personal data must be carried out in full compliance with the applicable data protection legislation. Accordingly, unauthorized access to personal data, misuse or any unlawful transaction is strictly prohibited.

Tiryaki Employees and Tiryaki Stakeholders are obliged to act diligently regarding the confidentiality of Confidential Information and/or personal data and to comply with the rules determined by Tiryaki within the scope of measures. Tiryaki Employees may not share Confidential Information without the written consent of Tiryaki and a Confidentiality Agreement with the other party. Tiryaki Stakeholders are also obliged to prevent improper disclosure of Confidential Information and personal data.

Tiryaki is a community that takes care to use its resources correctly and efficiently within the framework of its activities. Tiryaki does not allow any behavior that may cause any loss, damage, abuse, misuse or misuse of Tiryaki's tangible and intangible assets as a result of negligence or intentional action. In this context, Tiryaki Employees and Tiryaki Stakeholders are responsible for the protection of Tiryaki's tangible (such as cash, company equipment, vehicles, etc.) and intangible assets (such as commercial information, intellectual property rights, etc.) and must continue to work in accordance with the principles set forth herein.

4.7. Sustainability Principle

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"Soil is a precious thing—the source of life. If the soil is lost, everything is lost... This land is my concern!" —Our Founder, Ali Tiryakioğlu

In its journey that began with the cultivation of a few acres of land, Tiryaki has continued its activities by being aware of the importance of soil and nature and fulfilling its responsibilities towards the environment. In this context, Tiryaki integrates all steps under the Environmental, Social and Corporate Governance System (ESG) headings into its business strategies, operations and decision-making processes.

Tiryaki organizes its sustainability approach under the headings of Environmental Sustainability, Bioeconomy, Productivity Development and Social Impact

Environmental Sustainability

Optimizes water management by conserving natural resources, reducing carbon footprint and promoting the use of renewable energy. Regenerative agriculture practices protect soil health, support biodiversity and promote environmentally friendly production.

Bioeconomy

Adopting circular economy models, it increases biomass utilization, utilizes agricultural waste and makes food systems more efficient with biotechnological solutions. It shapes the future of agricultural production by developing innovative solutions such as sustainable aviation fuel, deep processing and vegetable proteins.

Productivity Improvement

It supports the use of certified seeds in agricultural production and uses resources in the most efficient way with advanced agricultural technologies and zero waste principles. It optimizes production processes and increases efficiency in the food supply chain through digitalization, data analytics and smart agriculture practices.

Social Impact

Provides a fair, safe and equitable working environment by embracing the principles of employee rights, inclusion and diversity. Promotes agricultural development and contributes to the economic and social development of communities by supporting the training and financial access of local farmers. Creates fair value chains by adopting ethical trade principles.

Tiryaki continues its existence as a company that works in harmony with nature and shapes the food systems of the future with ethical and responsible business models.

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Tiryaki Employees are obliged to act in accordance with the policies established by Tiryaki in this context. Tiryaki Stakeholders are obliged to conduct all their activities in compliance with relevant environmental, health and safety regulations and national and international standards

4.8. Transparent Financial Reporting

In accordance with its compliance policy and integrity values, Tiryaki fulfills all its legal and financial obligations and maintains accurate and reliable financial records. It is one of Tiryaki's fundamental principles to conduct all financial reporting in a compliant manner. Tiryaki Employees and Tiryaki Stakeholders are also obliged to carry out their activities within this scope.

4.9. Political Activities

Tiryaki its activities all over the world with courtesy and at an equal distance to people/communities/companies of all views. In this context, Tiryaki does not support any political party, politician, organization or platform, and does not direct Tiryaki Employees about their political views and does not allow the propaganda of any political view in the working environment. Tiryaki Employees are also obliged to act in accordance with Group Disciplinary Policy in this context.

5. Social Responsibility at Tiryaki

"Give whatever you can to society. Wish good for your neighbor so that good may come to you."
—Our Founder, Ali Tiryakioğlu

Tiryaki considers the impact of its activities on society and supports social responsibility projects.

In line with its goal of creating social impact, Tiryaki focuses on contributing to all segments of society, especially employees, farmers and youth. Tiryaki adopts inclusiveness and diversity as one of its fundamental principles, and provides a fair, safe and equitable working environment in all its processes.

In addition to supporting the training of local farmers and their access to financial resources, it contributes to their agricultural development through consultancy services. It is committed to empowering farmers, promoting sustainable agricultural practices and implementing innovative solutions in the fight against climate change.

Aware of its responsibility in the field of education, it develops various support programs for young people and contributes to their academic and professional development. It helps young people shape their career paths through projects and collaborations. In addition, it supports equal opportunity in education by providing scholarship opportunities to students facing financial

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difficulties, contributing to the improvement of school infrastructures and enhancing the quality of education.

In line with this mission, the Nigar-Ali Tiryakioğlu Education, Scientific Research and Health Foundation (NATIV), founded in 2024 by the Tiryakioğlu Family, aims to create a more just, sustainable and society by supporting education, health, social equality and scientific research.

6. Reporting Violations

Compliance with this policy is the primary responsibility of Tiryaki Employees and Tiryaki Stakeholders. Anyone who has information about a suspected violation of the Ethics and Compliance Policy is obliged to report it to compliance@tiryaki.com.tr. The actions to be taken regarding notifications to this address and the working and decision principles of the Ethics and Compliance Committee are detailed in the Ethics and Compliance Committee Working Principles Procedure.

Tiryaki strictly prohibits any form of retaliation against employees who report suspicious transactions, violations or any improper behavior, raise issues, file reports, participate in investigations, refuse to participate in suspected wrongdoing, or exercise their rights protected by law. In this context, Tiryaki Employees will be able to communicate openly and honestly without fear of retaliation.

Such notifications should only be within the scope of issues that are considered inappropriate within the framework of the rules specified in this policy. Customer or consumer complaints, suggestions, objections, etc. requests are not considered within this scope.

7. Administrative Responsibility

The publication, updating and implementation of this policy is the responsibility of the Legal and Compliance Manager, and any changes to the Policy shall enter into force upon the approval of the Executive Committee.

Approved Date		
Prepared by: Legal Compliance Manager	Approved by: Group Legal Counsel	Approved on behalf of Executive Committee
Feyza Büyükyıldız Aldemir	Işık Soydan	Süleyman Tiryakioğlu

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