

Principles of Sustainability Compliance Statement

The Sustainability Principles Compliance Framework, drawn up as per the amendment to the Corporate Governance Communiqué dated 02.10.2020 made by the Capital Markets Board, covers the essential principles expected to be disclosed regarding the Environmental, Social, and Corporate Governance (ESG) activities of public companies. While the implementation of these principles is voluntary, it is obligatory to report whether they are being implemented or not according to the “Comply or Disclose” principle.

Tat Gıda Sanayi, a Koç Group company, closely follows good practices in the field of sustainability, including those stipulated in the Sustainability Principles Compliance Framework of the CMB, and carries out its activities with the aim of adopting the generally accepted best practices to the greatest extent possible. Many aspects of Koç Holding’s “Lead, Together” sustainability strategy are in line with the principles set out in the “Sustainability Principles Compliance Framework”. Full compliance has not yet been achieved for reasons such as challenges arising from the implementation of these principles, uncertainties at the national and international scales, the incompatibility of some principles with the current structure of the Company, and the determination of compliance principles based on findings to be obtained from ongoing activities. Following our ongoing efforts, such as examining global practices in order to contribute to our company’s

goal of creating sustainable value, and completing data acquisition studies with the technical infrastructure implemented at Koç Group level, our goal is to implement the principles that have not yet been fully complied with.

The sustainability practices of Tat Gıda Sanayi A.Ş., in parallel with the principles in the CMB’s Sustainability Principles Compliance Framework, are explained in the Sustainability section of the Annual Report, and in detail in the Human Resources and other relevant sections. In line with the “comply or disclose” approach of the CMB, our disclosures for the basic principles that have not yet been fully complied with, or which have only been partially complied with due to current conditions, are as follows

- Tat Gıda has policies in place covering environmental, occupational health and safety, and ethical rules as announced on its web site. However, the Company’s long-term sustainability strategy has not yet been finalized. Efforts have been initiated and the goal is to set out the strategy in 2021 after updating the targets and objectives of the company.
- Tat Gıda has set out its sustainability, environmental, social and management policies, has announced them on its website, and mentions them in its annual reports. However, our efforts in

sustainability, environment, social and management areas will be revised after determination of our long and short-term targets. The Koç Group Companies will participate in these goal setting efforts, and action plans will be generated accordingly to prepare for the next stages.

- The company sets out ESG Key Performance Indicators (KPIs) and discloses its data on a yearly basis in a comparable way on its website. KPIs are not submitted together with industrial benchmarks due to the lack of sufficient and reliable data at local and international scale.
- Our legal department follows lawsuits against our company, and keeps our management team informed. There is no lawsuit concluded against our company.
- Environmental, social and corporate governance key indicators are monitored regularly. In parallel with the policies, standards and practices designed and followed within the Koç Group, ongoing activities aim to increase the reliability of indicators and ensure verification efforts by independent third parties.
- Production is carried out in Tat Gıda factories in accordance with the Turkish Food Codex and Turkish standards. Laws, legislation and regulations in force are closely

monitored and applied throughout our facilities and processes. All our businesses are ISO 50001 Energy Management System and ISO 14001 Environmental Management System certified. Beyond these efforts, no other disclosure is made for all legal regulations complied with. There are plans to address this issue in more detail in the environmental area of our website in the future.

- We construct our biodiversity strategy by identifying our effects, then evaluating, prioritizing, managing, designing, monitoring, reviewing and reporting them. In this way, we are developing an approach parallel to the priorities of the internationally agreed National Biological Diversity Strategy and Action Plan (UBSEP) set out in accordance with the Convention on Biological Diversity (CBD). We have done a lot of work on biodiversity, as explained on our website. Current studies are used for internal reporting and assessment only.
- Climate change is one of the priorities at Tat Gıda, and we have made great efforts towards sustainable agriculture, the efficient use of resources and raising the awareness of farmers along these lines. Our action plans to combat the climate crisis are handled within the scope of our sustainability strategy. Accordingly, the Scientific Target systematic has not yet been reflected in company practices as of the reporting period.
- ISO 50001 Energy Management Systems are in force at Tat Gıda enterprises and greenhouse gas emissions are lowered through energy reduction projects. Detailed information on yearly greenhouse

gas emissions is available on our website. In 2019, our “Total Productive Management” project checked for air leakages throughout our operations, and the use of compressed air was optimized on production lines and in the wastewater treatment plant. Similar projects are being implemented in the company, but there is currently no action study involving third parties. Group company activities and industrial good practices will be observed and efforts on this issue will be carried out in the next period.

- Scope-1 and Scope-2 calculations are tracked and monitored. The resulting data is used for internal reporting and assessment purposes and shared with executive teams.
- The amount of energy, natural gas and other resources consumed by Tat Gıda’s facilities and operations are regularly tracked and monitored. However, this data is currently used for internal reporting and assessment purposes only. Upon completion of our strategy design efforts, public disclosure of the relevant data and related standards, protocols and methodology will be considered.
- Data on renewable energy use is used for internal reporting and assessment purposes only. Upon completion of our strategy design efforts, public disclosure of the relevant data and related standards, protocols and methodology will be considered.
- The current operational scale of Tat Gıda does not include renewable energy production. However, a feasibility study is planned as part of our 5-year environmental strategy.

- Since the legal regulation processes for a carbon pricing system have not yet been completed in Turkey, our company does not apply one. Examples of internal carbon pricing and carbon credit good practices are followed but not yet implemented by the company.

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PRINCIPLE DESCRIPTION	ANNUAL REPORT SECTION, PAGE NUMBER	LINK
The Board of Directors (BoD) shall set out priority ESG considerations, risks and opportunities and draw up ESG policies accordingly. For effective implementation of these policies, intra-shareholding guidelines, business procedures, etc. may be designed. The Board of Directors shall make and publicly announce decisions regarding such policies.	Principles of Sustainability Compliance Statement, Page 92	
The BoD shall determine a Shareholding Strategy in accordance with ESG policies, risks and opportunities. It shall set out and publicly announce short and long term objectives in accordance with the shareholding strategy and ESG policies.	Principles of Sustainability Compliance Statement, Page 92	
The BoD shall identify and publicly announce the committees/departments charged with policy implementation. The relevant committees/departments shall report their policy activities to the BoD at least once a year and in any case, within the maximum periods determined for public disclosure of annual activity reports in the relevant regulations of the BoD.	Annual Report, Page 76-77	http://www.tatgida.com/tr/yatirimci-iliskileri/surdurulebilirlik/surdurulebilirlik-yonetimi/
The BoD shall draw up and publicly disclose implementation and action plans as per the determined short and long term goals.	Principles of Sustainability Compliance Statement, Page 94	
The BoD shall determine ESG Key Performance Indicators (KPIs) and compare them on a year by year basis. It shall compare KPIs with local and international sector benchmarks that are backed up by verifiable data.	Principles of Sustainability Compliance Statement, Page 94	http://www.tatgida.com/tr/yatirimci-iliskileri/surdurulebilirlik/cevresel-duyarlilikimiz/
The BoD shall establish innovation activities to improve sustainability performances for business activities, or products and services.	Annual Report, Page 59	http://www.tatgida.com/tr/inovasyon/
The BoD shall report and publicly announce its sustainability performance, objectives and actions at least once a year. It shall disclose information about sustainability activities as part of the annual report.	Annual Report, Page 57-63	http://www.tatgida.com/tr/yatirimci-iliskileri/surdurulebilirlik/cevresel-duyarlilikimiz/ http://www.tatgida.com/Files/Tat_Gda19_Faaliyet_Raporu.pdf
Significant information must be shared in a direct and concise manner in order for stakeholders to understand the stance, performance and development of the shareholding. The BoD may also disclose detailed information and data on its corporate website and draw up separate reports that directly meet the needs of different stakeholders.	Annual Report, Page 74	http://www.tatgida.com/tr/yatirimci-iliskileri/finansal-raporlar/finansal-raporlari/ http://www.tatgida.com/tr/yatirimci-iliskileri/finansal-raporlar/faaliyet-raporlari/
The BoD shall display the utmost care in terms of transparency and reliability. It shall objectively disclose all kinds of events on priority issues in announcements and reports as part of a balanced approach.		

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The BoD shall disclose all information about its activities associated with the 2030 United Nations (UN) Sustainable Development Goals.	Annual Report, Page 48,50	http://www.tatgida.com/tr/yatirimci-iliskileri/surdurulebilirlik/cevresel-duyarlilikimiz/
The BoD shall make announcements regarding lawsuits filed and/or concluded pertaining to environmental, social and corporate governance.	Annual Report Page 19 Principles of Sustainability Compliance Statement, Page 94	
If verified by independent third parties (independent sustainability assurance providers), the BoD shall publicly disclose its sustainability performance ratings and make efforts to increase such verification processes.	Annual Report Page 59, 61 Principles of Sustainability Compliance Statement, Page 94	
The BoD shall disclose its policies and practices, action plans, environmental management systems (aka ISO 14001 standards) and programs in the environmental management area.	Annual Report, Page 51,57	http://www.tatgida.com/tr/yatirimci-iliskileri/surdurulebilirlik/cevresel-duyarlilikimiz/
The BoD shall act in compliance with environment laws and other relevant regulations and disclose their actions.	Annual Report Page 50, 53 Principles of Sustainability Compliance Statement, Page 93	http://www.tatgida.com/tr/yatirimci-iliskileri/surdurulebilirlik/cevresel-duyarlilikimiz/
The BoD shall disclose the reporting period, reporting date, data collection process, reporting conditions and the limitations of the environmental report on the Principles of Sustainability.		http://www.tatgida.com/tr/yatirimci-iliskileri/surdurulebilirlik/cevresel-duyarlilikimiz/
On environment and climate change issues, the BoD shall declare which shareholder holds the highest responsibility, the relevant committees and their duties.	Annual Report, Page 76-77	http://www.tatgida.com/tr/yatirimci-iliskileri/surdurulebilirlik/surdurulebilirlik-yonetimi/ http://www.tatgida.com/tr/yatirimci-iliskileri/surdurulebilirlik/surdurulebilirlik-yonetimi/surdurulebilirlik-komitesi-calisma-esaslari/
The BoD shall disclose the incentives provided for the management of environmental issues, including the achievement of objectives.	Annual Report, Page 37-38, 51	http://www.tatgida.com/tr/yatirimci-iliskileri/surdurulebilirlik/cevresel-duyarlilikimiz/
The BoD shall disclose how environmental problems are integrated into business objectives and strategies.	Annual Report, Page 58-59	http://www.tatgida.com/Files/pdf/TatGida_Cevre_Politikasi_25042016.pdf
The BoD shall disclose its sustainability performance towards business processes or products and services and its activities to improve this performance.	Annual Report, Page 58-59	http://www.tatgida.com/tr/yatirimci-iliskileri/surdurulebilirlik/cevresel-duyarlilikimiz/
The BoD shall report not only in terms of direct operations, but also how it manages environmental topics in the shareholding value chain and integrates suppliers and customers into its strategies.	Annual Report, Page 63	http://www.tatgida.com/tr/yatirimci-iliskileri/surdurulebilirlik/tedarik-zinciri-politikasi/

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The BoD shall disclose whether it is involved in policy-making processes on environmental issues (industrial, regional, national and international), its collaborations with any environmental associations, relevant organizations and non-governmental organizations, its tasks, if any, and the activities supported.	Annual Report, Page 38	http://www.tatgida.com/tr/yatirimci-iliskileri/surdurulebilirlik/calisanlarimiz/
"The BoD shall regularly report information on environmental impacts in light of environmental indicators in a comparable way: Greenhouse gas emissions (Scope-1 (Direct), Scope-2 (Energy-indirect), Scope-3 (Other indirect))"	Annual Report, Page 60	http://www.tatgida.com/tr/yatirimci-iliskileri/surdurulebilirlik/cevresel-duyarlilikimiz/
"The BoD shall regularly report information on environmental impacts in light of environmental indicators in a comparable way: Air quality"	Annual Report, Page 59	http://www.tatgida.com/tr/yatirimci-iliskileri/surdurulebilirlik/cevresel-duyarlilikimiz/
"The BoD shall regularly report information on environmental impacts in light of environmental indicators in a comparable way: Energy management"	Annual Report, Page 59	http://www.tatgida.com/tr/yatirimci-iliskileri/surdurulebilirlik/cevresel-duyarlilikimiz/
"The BoD shall regularly report information on environmental impacts in light of environmental indicators in a comparable way: Water and wastewater management"	Annual Report, Page 60	http://www.tatgida.com/tr/yatirimci-iliskileri/surdurulebilirlik/cevresel-duyarlilikimiz/
"The BoD shall regularly report information on environmental impacts in light of environmental indicators in a comparable way: Waste management"	Annual Report, Page 60	http://www.tatgida.com/tr/yatirimci-iliskileri/surdurulebilirlik/cevresel-duyarlilikimiz/
"The BoD shall regularly report information on environmental impacts in light of environmental indicators in a comparable way: Bio-diversity impacts"	Principles of Sustainability Compliance Statement Page 95	http://www.tatgida.com/tr/yatirimci-iliskileri/surdurulebilirlik/cevresel-duyarlilikimiz/
The BoD shall disclose the details of the standards, protocols, methodologies and base years used to collect and calculate its data.	Annual Report, Page 57-63	http://www.tatgida.com/tr/yatirimci-iliskileri/surdurulebilirlik/cevresel-duyarlilikimiz/
The BoD shall disclose the status (increase or decrease) of environmental indicators for the reporting year as compared to previous years.	Annual Report, Page 57-63	http://www.tatgida.com/tr/yatirimci-iliskileri/surdurulebilirlik/cevresel-duyarlilikimiz/

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The BoD shall establish and state its short and long term objectives for lowering its environmental impact. It is advised that such objectives be set out scientifically as suggested by the United Nations Climate Change Conference. The BoD shall give information on what progress has been made for the reporting year in line with previously determined objectives.	Annual Report, Page 57-63	http://www.tatgida.com/tr/yatirimci-iliskileri/surdurulebilirlik/cevresel-duyarlilikimiz/
The BoD shall disclose its strategy and actions for fighting the climate crisis.	Principles of Sustainability Compliance Statement Page 94	
The BoD shall disclose its programs or procedures to prevent or mitigate potential adverse impacts of the products and/or services it offers and disclose the actions of third parties to lower greenhouse gas emissions.	Principles of Sustainability Compliance Statement Page 94	
The BoD shall disclose the actions taken to reduce environmental impacts, the total number of projects and initiatives executed, their environmental benefits/gains, and cost savings.	Annual Report, Page 51, 59-62	http://www.tatgida.com/tr/yatirimci-iliskileri/surdurulebilirlik/cevresel-duyarlilikimiz/
The BoD shall report data for total energy consumption (excluding raw materials) and energy consumption according to Scope-1 and Scope-2.	Principles of Sustainability Compliance Statement Page 95	
The BoD shall provide information about how much electricity, heat, steam and cooling were generated and consumed for the reporting year.	Principles of Sustainability Compliance Statement Page 95	http://www.tatgida.com/tr/yatirimci-iliskileri/surdurulebilirlik/cevresel-duyarlilikimiz/
The BoD shall work towards increasing the use of renewable energy, transition to zero or low carbon electricity and disclose how this work progresses.	Principles of Sustainability Compliance Statement Page 95	
The BoD shall disclose its data on renewable energy generation and consumption.	Principles of Sustainability Compliance Statement Page 95	
The BoD shall execute energy efficiency projects and report how much energy consumption and emissions were reduced as a result of these efforts.	Annual Report, Page 51	http://www.tatgida.com/tr/yatirimci-iliskileri/surdurulebilirlik/cevresel-duyarlilikimiz/
The BoD shall report the amount of water extracted from under or above ground, consumed, recycled and discharged, its sources and procedures (including the total amount of extracted water by source, the water resources affected by the extracted water, and the percentage and total volume of recycled and reused water).	Annual Report, Page 51	http://www.tatgida.com/tr/yatirimci-iliskileri/surdurulebilirlik/cevresel-duyarlilikimiz/

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The BoD shall disclose whether its operations or activities are included in a carbon pricing system (Emission Commerce System, Cap & Trade or Carbon Tax).	Principles of Sustainability Compliance Statement, Page 95	
The BoD shall disclose the amount of carbon credits accumulated or purchased during the reporting period.	Principles of Sustainability Compliance Statement, Page 95	
If carbon pricing applies within the shareholding, the BoD shall disclose the details.	Principles of Sustainability Compliance Statement, Page 95	
The BoD shall announce all compulsory and voluntary platforms on which it shares its environmental information.		http://www.tatgida.com/tr/yatirimci-iliskileri/surdurulebilirlik/cevresel-duyarlilikimiz/
The BoD shall draw up a Corporate Human Rights and Employee Rights Policy, in which it commits to full compliance with the Universal Declaration of Human Rights, the ILO Conventions ratified by Turkey, and the legal frameworks and legislation regulating human rights and working life in Turkey. It shall publicly disclose this policy and the roles and responsibilities associated with its implementation.	Annual Report, Page 46,61,75	http://www.tatgida.com/tr/insan-kaynaklari/tatda-calismak/ http://www.tatgida.com/tr/insan-kaynaklari/etik-yaklasimimiz/
The BoD shall ensure equal opportunities during recruitment processes. It shall include fair labor, the improvement of working standards, women's employment, and inclusion (gender, religion, language, race, ethnic origin, age, disability, refugee discrimination etc.) in its policies, and observe how this affects the supply and value chain.	Annual Report, Page 61-62	http://www.tatgida.com/tr/insan-kaynaklari/etik-yaklasimimiz/
The BoD shall disclose the measures taken across the value chain to support groups susceptible to economic, environmental, and social factors (low-income groups, women, etc.) or minority rights/equal opportunities.	Annual Report, Page 62	http://www.tatgida.com/tr/insan-kaynaklari/etik-yaklasimimiz/

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The BoD shall report developments in preventing and rectifying discrimination, inequality, violations of human rights, and forced labor. It shall disclose its regulations preventing underage employment.	Annual Report, Page 61	http://www.tatgida.com/tr/insan-kaynaklari/etik-yaklasimimiz/
The BoD shall disclose its policies regarding its investments in employees (training, development policies), compensation, benefits, union rights, work-life balance solutions and talent management. It shall form mechanisms for the resolution of employee complaints and disputes and set out dispute resolution processes. It shall regularly disclose activities performed to provide employee satisfaction.	Annual Report, Page 61,76	http://www.tatgida.com/tr/insan-kaynaklari/tatda-calismak/ http://www.tatgida.com/tr/insan-kaynaklari/etik-yaklasimimiz/
The BoD shall prepare occupational health and safety policies and disclose them to the public. It shall share accident statistics and measures taken to prevent occupational accidents and to protect health.	Annual Report, Page 62	http://www.tatgida.com/tr/insan-kaynaklari/tatda-calismak/
The BoD shall prepare and disclose personal data protection and data security policies.	Annual Report, Page 63	http://www.tatgida.com/Files/pdf/Tat_Topluluk_Sirketleri_KVK_Islenmesi_Politika.pdf
The BoD shall prepare and publicly disclose a policy of ethics (including work, work ethics, compliance processes, advertising and marketing ethics, open disclosure, etc).	Annual Report, Page 49	http://www.tatgida.com/tr/insan-kaynaklari/etik-yaklasimimiz/
The BoD shall disclose its efforts regarding social investment, social responsibility, financial inclusion and access to financing.	Annual Report, Page 37,51	http://www.tatgida.com/tr/insan-kaynaklari/ortak-degerlerimiz/
The BoD shall hold meetings and training programs to inform employees about ESG policies and practices.	Annual Report, Page 49	www.tatgida.com.tr
The BoD shall consider the needs and priorities of all stakeholders (employees, customers, suppliers and service providers, public entities, shareholders, society and non-governmental organizations, etc.) as it performs its sustainability activities.	Annual Report, Page 57-63	http://www.tatgida.com/tr/yatirimci-iliskileri/surdurulebilirlik/surdurulebilirlik-yonetimi/surdurulebilirlik-komitesi-calisma-esaslari/

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The BoD shall draw up and publicly disclose a customer satisfaction policy for the management and resolution of customer complaints.		http://www.tatgida.com/tr/bizi-taniyin/sorumluluklar/
The BoD shall maintain continuous and transparent stakeholder communication, and report information about which stakeholders it communicates with, for what purpose, about what topic, how often it communicates, and the progress made in its sustainability activities.	Annual Report, Page 75	http://www.tatgida.com/tr/yatirimci-iiiskileri/kurum-kimligi-ve-yonetimi/kurumsal-yonetim/
The BoD shall publicly disclose which international reporting standards it has ratified (Carbon Disclosure Project (CDP), Global Reporting Initiative (GRI), International Integrated Reporting Council (IIRC), Sustainability Accounting Standards Board (SASB), Task Force for Climate-Related Financial Disclosures (TCFD) etc.)		https://cdn.koc.com.tr/cmscontainer/kocholding/media/koc/05surdurulebilirlik/raporlar/surdurebilirlik-raporu-tr/koc-grup-surdurulebilirlik-raporu-2019.pdf
The BoD shall publicly disclose the international organizations or principles it has signed or is a member of (Equator Principles, United Nations Environment Program Finance Initiative (UNEP-FI), United Nations Global Principles (UNGC), United Nations Principles for Responsible Investment (UNPRI) etc.), or the international principles it has ratified (International Capital Market Association (ICMA) Green/Sustainable Bond Principles etc.)		https://www.koc.com.tr/surdurulebilirlik https://www.unglobalcompact.org/what-is-gc/mission/principles#anti-corruption
The BoD shall endeavor to be included on the Borsa Istanbul Sustainability Index and on international sustainability indices (Dow Jones Sustainability Index, FTSE4Good, MSCI ESG Indices etc.)		https://www.borsaistanbul.com/files/BIST_Surdurulebilirlik_Endeksi_Degerlemeye_Tabi_sirketler_Listesi_2020.pdf
The BoD shall make the maximum effort to comply with all Corporate Governance principles required by the Capital Markets Board Corporate Governance Communiqué No. II-17.1 and all other Corporate Governance Principles.	Annual Report, Page 74	http://www.tatgida.com/tr/yatirimci-iiiskileri/kurum-kimligi-ve-yonetimi/yonetim-kurulu/
The BoD shall consider sustainability and the environmental impacts of its activities and the relevant principles while determining its corporate governance strategy.	Annual Report Page 57,92	http://www.tatgida.com/tr/yatirimci-iiiskileri/surdurulebilirlik/surdurulebilirlik-yonetimi/
The BoD shall take the actions necessary to comply with the principles regarding beneficiaries and to strengthen communication with beneficiaries as stated in the Corporate Governance Principles. It shall consider the opinions of beneficiaries in determining sustainability measures and strategies.	Annual Report, Page 75	http://www.tatgida.com/tr/yatirimci-iiiskileri/surdurulebilirlik/surdurulebilirlik-yonetimi/
The BoD shall make efforts to raise awareness about social responsibility projects, activities and training, and sustainability and its importance.	Annual Report Page 51,55	http://www.tatgida.com/tr/yatirimci-iiiskileri/surdurulebilirlik/surdurulebilirlik-yonetimi/ http://www.tatgida.com/tr/basin-odasi/
The BoD shall endeavor to abide by international standards and become a member of initiatives related to sustainability and to contribute to its progress accordingly.		http://www.tatgida.com/tr/yatirimci-iiiskileri/surdurulebilirlik/surdurulebilirlik-yonetimi/ http://www.tatgida.com/tr/yatirimci-iiiskileri/yatirimci-sunumu/ http://www.tatgida.com/tr/yatirimci-iiiskileri/telekonferanslar/
The BoD shall disclose its anti-bribery and corruption policies and programs and its principles of tax integrity.	Annual Report, Page 63	http://www.tatgida.com/tr/yatirimci-iiiskileri/surdurulebilirlik/tat-gida-etik-kurallar/