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SOCIAL COMPLIANCE POLICY

OUR PURPOSE, VALUES AND PRINCIPLES

As Venus Biscuits; "Our aim is to be committed to ethical values, responsible for occupational health and safety and the environment on our suppliers, customers, employees with whom we work, and all individuals and communities we come into contact with during our activities, and to set an example with these values as a corporate entity.

ALWAYS WORKING WITH INTEGRITY

Conducting our operations with honesty and respect for the people, organizations and environments our business comes into contact with has always formed the basis of our understanding of corporate responsibility.

POSITIVE IMPACT

As Venus Biscuits; We aim to create a positive impact in many areas, from the environment to social responsibility.

CONTINUOUS COMMITMENT

We have taken continuous improvement as our basic principle. In this context, we will always volunteer for sustainable work with our suppliers and stakeholders in order to continue our business in the long term.

WORKING WITH OTHERS

We want to work together with our suppliers and customers who have the same values and understanding as us and work to the same standards as us, without any discrimination.

Our social compliance policy includes the standards that we have created by working as a team, based on our basic principles and values, together with all our business partners. Our goal is to ensure that the "Social Compliance Policy" becomes the company culture within Venus Bisküvi Sanayi Ve Ticaret A.Ş. For this reason, social compliance standards have been established and started to be implemented. In addition to creating products and services with these social compliance standards, this policy undertakes to give its employees all rights arising from the standards within the framework of the law, to comply with occupational health and safety rules, to be sensitive to the environment, to create a workplace where open and honest communication between employees is respected and valued. The social compliance policy is announced to all our employees through training,

The Social Compliance Policy covers the following components:

- Forced Labor (Involuntary Labor)
- Child Labor (Underage Workers)
- Discrimination
- Freedom of Association
- Discipline, Mistreatment and Harassment
- Bribery and Corruption
- Working Hours and Wages (Wage / Salary)

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PLT.01/00/28.03.2023

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- Occupational health and Safety
- Communication, Wishes and Complaints
- Recruitment and Employment
- Business arrangement
- Supply chain management
- Environment
- Education
- management system
- Respect for Law
- Public Activities
- Innovation
- Rivalry
- Conflict of Interest
- Protection of Personal Data
- Compliance, auditing, reporting

1. Forced Labor (Involuntary Labor)

Our business prohibits forms of employment, including forced labor, prison work, apprenticeships, bonded labor, military or slave labor, and all forms of human trafficking.

2. Child Labor (Underage Workers)

Our business adheres to the minimum age provisions of applicable laws and regulations. Our workplace prohibits anyone under the age of 18 from working. Our workplace's ban on child labor complies with the Labor Law, Occupational Health and Safety Law, other legal regulations and International Labor Organization standards.

3. Discrimination

At Venus Bisküvi, we will create a working environment where mutual trust and respect are essential. In the employment and promotion of employees, we will act only on the basis of the qualifications and skills required for the job to be performed.

We will ensure that our employees work in safe and healthy conditions. No one can be pressured or used by force regarding work and work.

We will strive to develop the personal talents and skills of each of our employees.

We will constantly ensure the best communication with our employees through the company's information resources and consultation procedures.

Venus Biscuits also; Discrimination cannot be made based on social class, nationality, ethnicity, religion, age, disability, gender, financial status, sexual orientation, union membership, political affiliation, health or pregnancy.

Personnel selection for the workplace is made based on qualifications such as open position, education, interests, talent and work experience.

4. Freedom of Association

We respect our employees' freedom of personal association.

5. Discipline, Mistreatment and Harassment

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Disciplinary rules determined by the company are applied in order to ensure disciplined work. The company cannot impose any wage deduction to discipline its employee.

The company is obliged to ensure that the working environment is peaceful and that employees work happily. The personality and dignity of every employee is respected. Institutional punishment, verbal, physical, sexual or psychological harassment, mobbing, threats or coercion are strictly prohibited.

6. Bribery and Corruption

Venus Bisküvi does not give or receive bribes, directly or indirectly, and does not use improper means to obtain commercial or financial gain. None of our employees will accept or give a gift or money that constitutes or could be interpreted as a bribe. Will not engage in money laundering activities. Requests to give or receive bribes or to use other inappropriate means will be rejected immediately and reported to management. Action will be taken in accordance with the Business Principles Policy against any company employee who accepts money, gifts or benefits for an improper purpose or in an improper amount/value.

Venus Bisküvi's accounting records will fully show and reflect the details of the transactions they contain.

Venus Bisküvi employees and their first-degree family members cannot receive money or cash equivalent gifts, travel allowances, commissions, loans, securities, or work for free or at a discounted rate from any third party, neither at work nor at home, nor while traveling for the company. They must not request or accept services (i.e. construction or maintenance work, free telephone or transportation, etc.) or favors from their partner.

Since giving gifts is a part of our national culture, an employee may give gifts such as pens, small calculators, calendars, watches, mugs, t-shirts, etc. that bear the logos of third parties and have a reasonable value, which can be described as promotional products. It may be deemed appropriate to accept gifts such as: However, such gifts should not be accepted on a regular or permanent basis.

Venus Bisküvi prohibits any employee from offering/giving gifts or bribes or anything else persuasive, other than product samples. Any criminal acts or criminal situations that may arise under the law resulting from such actions are the sole responsibility of the relevant person.

7. Working Hours and Wages (Wage / Salary)

Applicable laws and obligations are complied with when determining working hours. All overtime work is carried out within the framework of free will and voluntariness.

Our applications; It is carried out in full compliance with applicable laws and employment contracts regarding wages, working hours and overtime. Based on the minimum wage as the minimum wage that employees can cover their living expenses; It is ensured that there is no wage below the minimum wage and that overtime wages are paid by making additions as required by law. We offer opportunities to our employees to develop their skills and capacities, and these efforts are supported by providing promotion opportunities whenever possible.

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

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8. Occupational health and Safety

Accepting people as the most valuable asset in all its activities and minimizing any losses that may occur by creating a safer and healthier working environment is our primary goal,

To organize training in order to ensure that all employees are aware of their individual responsibilities regarding the issue, to provide the necessary equipment in terms of Occupational Health and Safety, to comply with local laws, regulations and conditions regarding Occupational Health and Safety, taking into account Venus Bisküvi standards and rules, to ensure that all employees are aware of Occupational Health and Safety. It aims to create a communication environment where they can work in accordance with the safety policy and to raise awareness about the work done in this regard, to identify risks related to occupational health and safety hazards that may arise from the activities of our institution and to keep these risks under control by reducing them to acceptable levels.

9. Communication, Wishes and Complaints

The company is committed to establishing a bond with its personnel on the basis of good faith by listening to their opinions, obtaining information from their opinions and taking their opinions into consideration. In this context, by determining employee representatives in accordance with the legal legislation, it creates an environment where employees can discuss their problems with the representatives and allows them to submit their problems in writing to the suggestion boxes. It is committed to establishing a dialogue with its stakeholders, when appropriate, on workplace-related and workplace rights issues within its sphere of influence.

Within the scope of this policy, no retaliatory or punitive action is taken against employees who express their concerns, concerns and complaints, and the Suggestion, Wish and Complaint boxes created to express these concerns and concerns are used. Likewise <u>a.scenario @venus.biz</u> All our stakeholders can reach us via e-mail address. Employees can leave all their opinions, requests, complaints and suggestions in the boxes and these are opened and evaluated by the Social Compliance Officer and worker representative. If there are complaints in the boxes opened with a report, the necessary improvement, corrective and preventive works are carried out for the areas open to improvement.

10. Recruitment and Employment

Vacant positions needed by the company management are determined and employment is carried out by the company management in accordance with the law and within the framework of certain rules (foreign workers, egalitarian approach, leave, wage, holiday, employment contract, etc.).

11. Business arrangement

An "Employment Contract and Personnel Regulation" is prepared between the company and the person to be employed, in accordance with the workplace and the law, and containing the

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SOCIAL COMPLIANCE OFFICER

GENERAL MANAGER

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conditions offered to the candidate personnel. "Employment Contract and Personnel Regulations" are signed by the personnel who accept to start working.

12. Supply chain management

Our suppliers, whom we prioritize in our purchasing activities, are informed about the social compliance rules and their commitments are taken regarding their compliance with these issues.

13. Environment

Venus Bisküvi aims to make continuous progress towards the management of our impact on the environment and the goal of engaging in sustainable activities in the long term.

Venus Bisküvi will cooperate with relevant stakeholders for environmental protection, better understanding of environmental issues, dissemination of good examples and sustainability studies. Venus Bisküvi will not establish its facilities on forest and agricultural lands, and supports policies that will protect our agricultural lands.

14. Education

Venus Biscuit; It undertakes to organize in-company or external trainings to increase the occupational health and safety awareness of our employees, to support their professional and personal development, and to ensure the continuous development of the company due to the development of employees through the trainings organized.

15. management system

By adhering to the applicable laws and regulations, the business partnership rules of our customers and the rules of international social responsibility organizations (ETI) are followed. Continuous improvement activities are carried out on this issue and the necessary budget is provided for these studies.

16. Respect for Law

Venus Bisküvi company and our employees must comply with the legal order and legislation of our country.

17. Public Activities

Venus Bisküvi will endeavor to advance its legitimate business interests and defend its legal rights. Venus Bisküvi will cooperate with the government and other authorized organizations, both directly and through industry/trade organizations, for the issues in its field of activity.

18. Innovation

We will never compromise on the basic principles of product safety in our innovation efforts to meet customer and consumer expectations.

19. Rivalry

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Venus Bisküvi believes in tough but fair competition and supports the development of necessary competition laws. Venus Bisküvi employees will carry out their activities in accordance with the principles of fair competition and the regulations in force.

20. Conflicts of Interest

Venus Bisküvi employees will not engage in personal activities that may conflict with their responsibilities regarding the company, and they will prevent their financial interests that may cause this. Venus Bisküvi employees cannot try to gain profit for themselves or others by using their positions for purposes other than their intended purpose. They cannot favor a group or person.

21. Protection of Personal Data

All of our employees will be treated in accordance with the "additional protocol on the protection of personal data", which has been prepared within the framework of the principle of privacy of private life, for any personal data obtained or processed due to business principles within the scope of the law on the protection of personal data No. 6698.

22. Compliance-Audit-Reporting

Compliance with these principles is our indispensable rule.

As Venus Bisküvi, we are primarily responsible for ensuring that these principles are communicated to all employees and that they understand them and fulfill their requirements. In case of non-compliance with business principles, our employees and suppliers may report this non-compliance to a.senarya@venus.biz, anonymously if necessary. They will be able to notify you via e-mail.

Compliance with these principles is guaranteed and audited every year. Compliance with the principles is subject to review by the General Manager.

Venus Bisküvi is responsible for ensuring that these principles are violated or if there is a suspicion of violation, to ensure that this situation is examined in detail and to take necessary action against those responsible.

Necessary measures have been taken to ensure that employees can make such notifications confidentially, and any employee will be prevented from being harmed by making such notifications.

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