



## **TFI TAB Gıda Yatırımları A.Ş and its Subsidiaries Code of Ethics**

*We are all committed to making the world a better place by doing the right thing.*

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## Statement by the Board of Directors of TFI TAB Gıda Yatırımları A.Ş. on the Importance of the Code of Conduct –

"It all starts with me."

Dear Employees,

We are pleased to share that our commitment to the Code of Conduct is fully integrated into every one of our activities. We all maintain our determination to adhere to the highest level of ethical conduct and make our world a more livable place.

TFI TAB Gıda Yatırımları A.Ş. ("**TFI**" or "**Company**") began its journey 30 years ago as a family business. Although the products we offer, the strategies we pursue, and even our corporate structure have changed over the years since our founding, the foundations and ethical values to which we adhere have always remained constant. We continue to uphold our goal of preserving these values, which have always led us to success and integrity, with the same respect and commitment as in the early days of the company. In this context, as members of TFI, we have outlined our ethical and legal responsibilities to our shareholders, the public, and our colleagues in the Code of Conduct that we have shared. In complying with the Code of Conduct, our strong and reliable judgment, our principles of personal integrity and honesty will continue to be the guiding principles of our actions and decisions.

Within the framework of our Code of Conduct, any violations that may occur pose risks that could harm the sustainable success of our Company and lead to serious consequences. Therefore, violations can damage our reputation, which we have carefully built together over the years as one of our most valuable assets, and can negatively affect our investment and growth capacity. As the Board of Directors, managers, and employees, we are all responsible for learning the principles set forth in this document in detail, following them closely, and ensuring compliance. We would like to remind you that if you become aware of any wrongdoing or any situation that violates the Code of Conduct, you are responsible for reporting it immediately. The channels where you can receive help and advice in such situations and report your concerns regarding compliance have been communicated to you through this Code of Conduct.

We must all implement the Code of Conduct, which we are obliged to know, with zero tolerance and great sensitivity in all our activities to protect the integrity of our business. The Board of Directors has formally approved these rules and supports all initiatives aimed at encouraging their implementation.

Thank you all for supporting us in our compliance efforts.

Sincerely,

Erhan Kurdođlu,  
Chairman of the Board of Directors

Korhan Kurdođlu,  
Vice Chairman of the Board of Directors

## INTRODUCTION

This Code of Conduct ("**Code**") has been prepared to provide guidance for the employer/employee relationship at TFI and its subsidiaries (collectively "**Group**" or "**TFI Group**"). Our Code includes the obligation of employees and all our stakeholders to comply with applicable laws, regulations, and internal company procedures. All employees and others acting on behalf of TFI, regardless of their location or the nature of their work, are required to comply with this Code as a minimum standard. The standards set forth are equally binding on all functions and subsidiaries.

Our Code, which is in line with our commitment to integrity, outlines our stance on a number of important issues and clearly lists rules regarding conduct. This Code refers to Group policies, standards, and guidelines (collectively '**Group Policies**'). In many cases, only the main points or a summary of Group Policies are presented in this Code. For a full and complete copy of any Group Policy, we should refer to our Manager, the Human Resources Department, or the TFI Internal Control, Compliance and Risk Management Department. As a condition of our employment with the Company, we must remember that we are responsible for reviewing, knowing, and complying with all Group Policies, including the standards set forth in this Code. We must always bear in mind that action will be taken against any person who violates the Code within the framework of the sanctions of the Disciplinary Regulation.

Our Code and the related additional rules used within the Group summarize our views and expectations regarding the following:

- 1. Promotion and Protection of Human Rights;**
- 2. Ethical and Lawful Business Conduct;**
- 3. Management of Company Assets and Information;**
- 4. Stakeholder Interactions;**
- 5. Management of Crisis Situations;**
- 6. Reporting of Unethical Situations.**

As it is very important for all our employees to know the current rules, we expect each employee to review the most current version of the Code, additional policies and procedures annually and acknowledge that they are aware of the content of the aforementioned documents and set of rules, understand our standards and expectations, and are able to consistently apply these standards.

For more information, please see:

- [Commitment to the Code of Conduct](#)
- [Our Commitment to Integrity](#)

## OUR PURPOSE, VISION, MISSION, AND VALUES

Within the Group, our purpose, vision, mission, and values are put into practice through our Code. Our behavior when communicating with all our stakeholders, including our customers and shareholders, and with each other, determines how we are perceived. What we do is important; but how we do it is just as important. Every decision we make and every step we take should reflect our shared values and culture. These explain what we believe in together and guide us in

everything we do. Our values are universal across every role, every subsidiary, and all our locations.

**"Dreams cannot be learned; but they can be lost because of our fears." - Ertuğrul Kurdoğlu (1932 – 2013)**

**Our Purpose,** to create employment and benefit the environment and the communities in which we operate through our innovative and entrepreneurial spirit, corporate governance approach, and sound investments in different geographies around the world.

**Our Vision,** to be the world's largest Quick Service Restaurant ("QSR") operator, setting an example and leading the way with our subsidiaries and production facilities, each a leader in its sector.

**Our Mission,** to ensure the continuity of operations in all our companies with a focus on quality, customer satisfaction, and impeccable service, while moving towards realizing our vision with a focus on sustainability.

### **Our Values:**

- **Think Big:** We will be the best quick service restaurant operator in the world. We will achieve this through a data-driven approach with best-in-class people, systems, and processes. We will never settle for less than the best in the world.
- **Embrace Meritocracy:** We have a high-performance work culture. We evaluate people fairly based on their competencies and performance results against their goals.
- **Be Open-Minded:** We are always open to new ideas and new people. We innovate even in areas where we are market leaders. We have a culture where we can make the most of people's talents.
- **Take Ownership:** All our team members are our business partners. We take ownership and deliver results, regardless of titles, roles, and functions.
- **Embrace Technology:** We are eager users of technology to achieve our business goals.
- **Be Transparent:** We are open and honest about the way we work. We always try to do the right thing. We are transparent to all our stakeholders.
- **Care:** We care about our world, the community we live in, the environment, and our future.

***"Dreams can be realized together with common goals and values. No shortcuts that deviate from ethical rules are acceptable to achieve our dreams."***

## **1. PROMOTION AND PROTECTION OF HUMAN RIGHTS**

Within the Group, we act in accordance with the Universal Declaration of Human Rights in all our interactions and adopt equality, diversity and inclusion as principles. In the company culture, we consider these principles not only as corporate responsibilities but also as social responsibilities, and we expect all employees to act in accordance with these principles. In this direction, based on the rules and regulations of the International Labor Organization (ILO) and with corporate responsibility awareness, we have prepared a Corporate Social Compliance Policy and included the principles adopted within the Group in this Policy. The aim is to make these principles a part of the company culture; Within the Group, we primarily implement the necessary measures to

prevent interference with the rights of individuals in order to protect human rights, not to tolerate any kind of discrimination, and to include personnel subjected to discrimination in all processes, including working life. In this context:

- ✓ In line with our principles, we strive to create a workplace environment that does not allow discrimination. We include all individuals in Company processes, regardless of gender, sexual orientation, race, color, ethnic origin, age, religious and political beliefs, disability, etc.
- ✓ We do not tolerate Group employees acting contrary to the adopted principles, discriminating and bullying within the Group; in the event of mobbing, psychological or physical harassment or violence in the workplace, or causing an incident of this nature, we expect those who do not act appropriately in this matter to be reported to the reporting channels.
- ✓ We try to identify and maintain the most appropriate working methods in order to create a workplace environment where employees can work safely, healthy and productively, away from accidents, injuries and elements that threaten health; We take into account both national and international legislation and Occupational Health and Safety (OHS) performance in all processes in line with business objectives.
- ✓ Within the Group, we prohibit all forms of forced labor and inhumane working conditions. Working hours are regulated in accordance with the Labor Law No. 4857 and we base ourselves on the working hours specified in this Law.
- ✓ Within the Group, we implement the rules regarding child labor in accordance with the Labor Law, Occupational Health and Safety Law, ILO Fundamental Conventions, the United Nations Convention on the Rights of the Child, and other relevant legislation and standards.

For more information, please see:

- [Corporate Social Compliance Policy](#)
- [TFI Whistleblowing Policy](#)

## 2. ETHICAL AND LAWFUL BUSINESS CONDUCT

Within the Group, we are committed to complying with all applicable laws and standards, keeping accounting and financial records transparent and up-to-date to demonstrate compliance with relevant legislation, not tolerating corruption and bribery under any circumstances; not giving/accepting bribes to gain benefits or facilitate business, using company assets for our business purposes, establishing necessary mechanisms and policies to combat corruption and bribery, avoiding situations that may create conflicts of interest, and protecting the rights of our other stakeholders in these matters.

### 2.1. Compliance with Legal Requirements, Regulations, External and Internal Standards

The products of TFI and its subsidiaries are subject to close scrutiny by regulatory agencies and organizations. We are expected to comply with regulatory requirements in all countries where we operate within the Group. We must be aware of the laws, regulations and related secondary regulations that affect our work. If we are unsure, we should ask our manager or contact the Legal Department, other relevant departments or the TFI Internal Control, Compliance and Risk

Management Department in our company. Otherwise, violation or abuse of laws, regulations, rules and decisions may result in disciplinary action as well as individual criminal or legal liability.

### 2.1.a. Use of Company Information in Business Transactions:

The disclosure or dissemination of non-public financial or non-financial information relating to the Group, other than to those who need to know such information for a legitimate business purpose of TFI and its subsidiaries, is not permitted to other persons within or outside the Group. Unlawful disclosure of information about the Group to others who may be able to trade while in possession of such information, or providing such information as a "tip", may result in lawsuits against the person leaking such information. We expect the Group's board members, executives, employees and other managers to protect the confidentiality of non-public, particularly material, information and not to pass this information on to any person, either directly or indirectly by way of advice. Transactions that could be considered or give the impression of market manipulation are not permitted within the Group.

It is prohibited for persons with access to inside information to trade in the capital market instruments of the relevant companies in a buying or selling direction during the "prohibited period". We also expect employees to be cautious when trading in financial instruments and to avoid excessive, speculative or undesirable/prohibited transactions, never to use this information to gain personal advantage or to gain advantage for the Group, clients or any third party, and to consult their Investor Relations Departments, who are tasked with supporting employees in this matter, in case of any doubt when using the information. As the information of employees defined as insiders is kept in the Investor Relations Department and these employees may be required to obtain prior approval before trading in financial instruments or making decisions regarding these instruments, employees should act in cooperation with the Investor Relations Department officials.

### 2.1.b. Personal Data Protection Law:

Personal data is any information that can be used to identify a person. This information may include details such as the person's name, ID photo, address, telephone number or national ID number. Therefore, we must protect the confidentiality and security of the personal data of our customers, employees, business partners and others, take the necessary measures and act in accordance with the legislation and internal company guidelines governing how we will use this information. We must remember that it is against the law and ethical rules to violate the privacy rights of employees at the workplace or in environments where they are present for business purposes, and that such actions will not be tolerated in any way within the Group.

We must remember that we use all personal data about customers, business partners, employees or other stakeholders for business purposes, and we must use such data within the framework of the special measures set out in the Group Policies due to the fact that such data directly affects the privacy of individuals. Proper protection of the confidentiality of this information is an important part of our daily work and also a shared responsibility. In this context, we must comply with all applicable local and international legislation and the principles set out for the processing of personal data, and consult the Legal and TFI Internal Control, Compliance and Risk Management Departments in case of any doubt.

### 2.1.c. Competition Law (Antitrust):

Although there are differences at the international level, Competition Law, also known as Antitrust Law, generally observes agreements, concerted practices and information sharing that may exist between undertakings and associations of undertakings in order to ensure free and unrestricted

competition in the relevant market, and determines the principles relating to both these matters and the conduct of undertakings in a dominant position, and the effects on competition of mergers, acquisitions and the formation of joint ventures, using various principles. In this respect, it can be said that Competition Law regulates relations between undertakings operating at the same level in the relevant market, in other words, between competing undertakings ("horizontal relationship") or relations between two or more undertakings operating at different levels of the production/distribution chain ("vertical relationship") (such as franchise relations, relations with suppliers). If an infringement of competition rules is detected, in addition to facing heavy administrative fines or loss of reputation for the undertaking, the employee him/herself may also be subject to heavy administrative fines if he/she plays a decisive role in the infringement. In this context, as a Group, we expect to compete fairly with other players in the market. In this framework;

- We must act in accordance with the rules set out in the guidelines issued by the TFI Internal Control, Compliance and Risk Management Department and the Legal Departments.
- We must approach our contacts with competitors in all environments with caution. In matters where contact with competitors is likely to occur, either directly or indirectly, we must first act in agreement with the Legal Teams.
- We must not talk about issues that affect labor markets, such as wages, working conditions, personal rights, raise rates, even with our private contacts working in other companies.
- We must not contact or exchange information with competitors regarding commercial terms that are considered competition-sensitive data, including price, customer, region.
- We must try to obtain business-related information about our competitors by using legitimate methods, such as official documents or publicly available sources, using legal and ethical means. We must avoid even the impression of illegal or unethical conduct in these areas.
- We must not allow confidential or sensitive matters (such as pricing and strategy) to be shared or discussed with competitors.
- If the conversation turns to competition-sensitive matters at industry meetings or meetings with competitors at trade associations, we must leave immediately. We must then document our refusal to participate in the conversation and report it to the Legal Department.

#### 2.1.d. Combating Bribery and Corruption

We expect all our activities within the Group to be conducted in accordance with all applicable Anti-Corruption Laws. The Group's board members, executives and managers fully support this approach and attach great importance to intervening in incidents that may require the prevention and mitigation of bribery and corruption. In this context, the TFI Internal Control, Compliance and Risk Management Department has created an Anti-Bribery and Corruption Policy, which contains guidelines and standards to ensure that all employees are aware of applicable anti-corruption laws and comply with these rules in all their dealings with existing or potential Company customers, third parties and others. The Group's approach to bribery or improper inducements is set out in detail in the relevant conflict of interest policies.

Any fraud is prohibited, regardless of whether the Group's assets or third party assets are affected. Adequate control measures are implemented to prevent all fraudulent activities (fraud, embezzlement, theft, abuse or tax evasion, etc.). To demonstrate our commitment to eliminating

corruption, in addition to coordinating our ethics and reporting hotline within the Group, we have a TFI Internal Audit Department and a TFI Internal Control, Compliance and Risk Management Department that focus on monitoring activities to minimize corruption.

As combating such illegal situations is our shared responsibility, we expect all employees to be aware of the following rules as a minimum:

- A "Know Your Business Partner" due diligence process must be completed for all business partners with whom we intend to do business. In this context, always make sure to involve the Accounting and Purchasing Department, Legal Teams and the TFI Internal Control, Compliance and Risk Management Department in the processes.
- We must not enter into or maintain any relationship with individuals and entities located in very high-risk countries or with ties to government agencies. If we encounter this situation, we must immediately notify the TFI Internal Control, Compliance and Risk Management Department.
- We must not agree to engage with anyone on sanctions lists or with links to terrorist activities. We must remember that a zero tolerance approach is always taken in this regard.
- In situations that may create the impression or suspicion of bribery, we must act in accordance with the conflict of interest policies prepared by the TFI Internal Control, Compliance and Risk Management Department.

For more information, please see:

- [TFI Anti-Bribery and Corruption Policy](#)
- [TFI Supplier Evaluation and Acceptance Policy](#)

## 2.2. Conflicts of Interest

*"We are all responsible for properly investigating and reporting potential or actual conflicts of interest in the workplace in a timely manner for resolution."*

Being responsible means making smart choices and not forgetting our duty of loyalty to the Company in business transactions. This duty may be breached if we engage in activities that conflict or may be perceived to conflict with the interests of the Company. A conflict of interest or the perception of a conflict of interest may arise when we are or appear to be influenced by personal gain or interest considerations that conflict with our obligation to our Company for ourselves or a family member.

Conflicts of interest can arise when an employee's professional duties conflict with other interests. In a conflict of interest situation, there may be a risk that an employee's personal interest may undesirably influence their professional judgment, duties and responsibilities. If a conflict of interest is not well managed, it can lead to:

- Damage to the Company's interests, increased abuse, legal risks and penalties, including bribery and corruption;
- Damage to the employee's sense of fairness and overall employee engagement as a result of another employee's unfair advantage; and
- Reputational damage, questioning of transparency and accountability.

In general, we expect employees to avoid situations that could lead to a conflict between professional and personal interests. Even the appearance of such conflicts can be damaging. In this context, we have prepared policies to manage various types of personal conflicts of interest, such as "gifts, entertainment and business meals"; "sponsorship and donations", "outside positions and interests" to provide guidance to employees on how to deal with situations that may arise. The key points of these policies are included here, but in cases where these rules or underlying policies are not covered or where there is doubt as to whether a conflict of interest exists, employees are expected to seek assistance from their managers and/or the TFI Internal Control, Compliance and Risk Management Department.

### 2.2.a. Gifts, Entertainment and Business Meals

The offering and acceptance of gifts, business meals and entertainment is part of doing business; however, offers of gifts, business meals and entertainment from customers, suppliers, franchisees and other third parties can make it difficult to be objective in our business relationships, may inadvertently violate rules or compromise our independent positions vis-à-vis third parties. We must not accept gifts, business meals and entertainment or offered personal benefits from a third party or customer if they will or could give the impression of influencing our business decisions. If we have a pending business with any public institution or organization, we must never enter into a gift, business meal or entertainment process. The Group strictly prohibits employees from engaging in any activity that would create the impression of offering or accepting a bribe or create a conflict of interest. In order to avoid all these potential risks, we have set some rules and limits. We must apply the rules written in the TFI Gifts, Entertainment and Business Meals Policy prepared to guide such situations and the limits contained in these rules, and consult the TFI Internal Control, Compliance and Risk Management Department in all cases.

We may offer gifts, organize events, give meals and receptions, or accept incoming offers of gifts, business meals or entertainment within the limits set. These activities are permitted to be accepted or offered if the cost, quantity and frequency are reasonable, they are carried out in the interests of the Company in connection with day-to-day business and do not influence business decisions. However, we must remember that the entertainment, gifts and business meals offered and accepted must be recorded by the TFI Internal Control, Compliance and Risk Management Department. Each employee and manager is responsible for reporting all entertainment, gifts and business meals offered and accepted in reasonable detail and reflecting them accurately and fairly.

As explained in detail in the relevant Policy, we expect that gifts, entertainment and business meals of the nature specified below will never be accepted or offered:

- Gifts of cash or cash equivalents (e.g., lottery tickets and gift cards).
- Gifts, entertainment and business meals that create a sense of obligation in you.
- Gifts, entertainment and business meals that influence or appear to influence your business decisions.
- Extravagant or frequent situations.
- Gifts, entertainment and business meals that violate our Code, Company policies and procedures, or the rules, policies and procedures of the employer offering the gift, entertainment and business meal.

For more information, please see:

- [Gifts, Entertainment and Business Meals Policy](#)
- [TFI Anti-Bribery and Corruption Policy](#)

## 2.2.b. Outside Positions and Interests

We support our employees playing an active role in the community. However, when employees are involved in other organizations or companies, we must ensure that this involvement will not lead to (the perception of) any personal and/or corporate conflict of interest and will not damage our reputation in any way. We define an outside position as a position held by an employee outside of Group business. We do not distinguish between activities for which money is received or not received, or activities carried out for the benefit of TFI and its subsidiaries or at the employee's own initiative. An outside interest is a financial interest that an employee receives from an entity outside the Group that could affect their ability to perform their professional duties on behalf of TFI and its subsidiaries impartially. We expect employees to obtain approval from their superiors for accepting or maintaining outside positions and outside interests that could have an impact on their ability to perform their duties for the Group and/or could negatively affect the Group's reputation. In this regard, the TFI Internal Control, Compliance and Risk Management Department must be informed and a central record must be kept.

These positions and interests can arise in many ways, not all of which can be specifically stated here. Some examples to consider are provided below:

- Engaging in any activity that conflicts with the Company's business, such as working as a consultant or in another capacity for another QSR company,
- Having an equity stake in a competitor, supplier, franchisee or distributor of the Company or having another business relationship with such persons or entities,
- Serving as an executive or board member for a competitor, supplier, franchisee or any other company, or working as an employee or consultant,
- Serving on boards or similar critical positions for organizations not affiliated with TFI that could cause a conflict of interest that could damage TFI's reputation.

Employees and managers should seek advice from the TFI Internal Control, Compliance and Risk Management Department on the nature of such external positions and/or whether registration is required.

For more information, please see:

- [Outside Positions and Interests Policy](#)
- [TFI Anti-Bribery and Corruption Policy](#)

## 2.2.c. Sponsorships and Donations

Sponsorships and donations can be made provided that there is a genuine and legitimate business or social justification and that participation in such an activity is conducted in a transparent manner. As a general rule, we expect all sponsorships and donations to be reasonable in cost and frequency.

Charitable donations and sponsorships will contribute to both increased brand visibility and a stronger corporate citizen profile for TFI. However, all charitable donation and sponsorship activities conducted on behalf of TFI;

- Must be genuine and legitimate from a commercial or social perspective (e.g., social responsibility, social solidarity, education, health, scientific or cultural research, natural disasters, environment, sports and similar social issues, etc.);
- Must be aimed at enhancing the TFI brand and strengthening the corporate citizenship profile;
- Must not be for the benefit of any institution or organization that harms the environment and society, discriminates on the basis of ethnicity, nationality, gender, religion, language, race, sexual orientation, age or disability;
- Must not be intended to provide any benefit or be used for any corruption/irregularity;
- Must not be linked to any commercial opportunity;
- Must not serve/benefit any political purpose or political party under any circumstances;
- Must not be intended to provide any benefit to any public institution, municipality or government official, directly or indirectly through a third party.

The principles set out in the TFI Donation and Sponsorship Policy and the Anti-Bribery and Corruption Policy must be followed in all donation processes. The department owning the process is responsible for all donation and sponsorship processes and must work with the TFI Internal Control, Compliance and Risk Management Department on risk assessment and mitigation and review the recommendations of the TFI Internal Control, Compliance and Risk Management Department. All sponsorship and donation processes carried out must be recorded. In case of any doubt, we expect employees to seek assistance from management and/or the TFI Internal Control, Compliance and Risk Management Department.

For more information, please see:

- [TFI Donation and Sponsorship Policy](#)
- [TFI Anti-Bribery and Corruption Policy](#)

## 3. MANAGEMENT OF COMPANY ASSETS AND INFORMATION

### 3.1. Company Assets

Company assets include, to name a few, physical assets such as all kinds of materials, equipment, resources and hardware belonging to the Company, technological concepts such as IT systems, the Company's money, products and services, Company private vehicles, private information, business strategies including corporate opportunities and Company information. We expect all employees to diligently protect all such assets in their possession, to use them appropriately and effectively, and to help protect them from loss, damage, misuse, theft, fraud, misappropriation and destruction. This expectation also includes paying attention to saving in all matters.

When using or accessing Company assets, we are expected to do the following:

- Use Company assets accurately and effectively;
- Spend Company money wisely;
- Protect Company assets from theft, loss, unauthorized access or use, destruction or waste;
- Refrain from connecting personal laptops and personal computers to internal computer systems without using an approved private virtual network (VPN);

- Use Company assets in a manner consistent with applicable policies and laws;
- Refrain from using Company assets for personal gain: This means, among other things, that we may not use confidential information belonging to the Group to create a commercial benefit outside of our work in the Group, even if we developed or helped develop such information ourselves.

For more information, please see:

- [TFI Information Security Policy](#)

### **3.2. Protection of Our Confidential and Private Information**

The Group's Company information is valuable and must be kept confidential. We define confidential information as all information that employees use in the performance of their professional duties relating to or affecting individuals, organizations or the Group itself. Proper protection of the confidentiality of this information is an important part of our daily work and a shared responsibility.

We expect employees to act on a "need-to-know basis" when requesting or providing confidential information. This means that such information is only provided if it is necessary for the performance of the task. We also expect employees to take appropriate measures to prevent the leakage of confidential information due to their duties and to protect this information from theft, improper disclosure or misuse. This statement also means:

- Using Company information only for its intended use(s);
- Accessing Company information relating to our own individual responsibilities;
- Sharing Company information with those who need to know this information due to a legitimate business need;
- Sharing confidential company information through secure methods (such as encryption or using special sharing protocols) with third parties who need to know this information due to a legitimate business need and who have committed to adequately protecting such information through a signed confidentiality agreement;
- Copying documents containing company information only when required by our duties;
- Transferring confidential company information securely;
- Never leaving portable devices or documents such as USB devices, SD cards, etc. unattended if we are using them exceptionally and always encrypting information stored on such portable devices;
- Storing all information in accordance with guidelines, locking our computer and leaving a secure desk when leaving shared workspaces, meeting rooms, our desk or our home workspace (even for short periods of time such as meetings, lunch);
- Not knowingly sharing confidential company information on social media and exercising the due care and attention required by the job;
- Using the assets (e-mail account, mobile phone, tablet, computer, etc.) carrying company information allocated to you only for business-related corporate activities and not making any changes or upgrades to these assets without the company's knowledge and permission.
- Immediately notifying the Human Resources Department, Legal Department or TFI Internal Control, Compliance and Risk Management Department in the event that

confidential company information and critical company assets fall into the hands of unauthorized persons;

- Properly destroying company information.

During the normal course of business, private information about customers and employees may be obtained. However, this area is subject to strict legal requirements, including personal data protection legislation, and we must respect the confidentiality of this information and take the necessary steps to adequately protect such information.

For more information, please see:

- [TFI Information Security Policy](#)

### **3.3. Our Statements Regarding Products and Services**

Integrity with regard to our products and services means that we always make truthful statements about our products and services. Misleading or incorrect information about products or services can harm both our customers and our reputation. This violates our principles and is prohibited. It is crucial that personnel working in marketing, advertising and sales comply with these guidelines.

Every day, our guests visit our restaurants and enjoy our food. Serving safe, high-quality food is one of the ways we earn the trust of people around the world every day. We do not take their trust in our food lightly or for granted. We are committed to the quality and safety of our food. To put our commitment to the process into practice, we have established food safety and distribution systems that include stringent standards and training for our restaurant employees, as well as requirements for suppliers. These standards and training topics cover, but are not limited to, employee health, product handling, ingredient and product temperature management, and the prevention of cross-contamination. Food safety training focuses on the prevention of illness, food safety, and regulatory compliance in daily operations. Our standards also promote compliance with applicable laws and regulations when opening new restaurants or renovating existing ones. Our unwavering commitment to food safety and quality requires that our suppliers share this commitment. As part of our responsible sourcing principles, we work with each supplier to ensure their food safety plans meet our requirements before allowing food ingredients to enter our manufacturing facilities and restaurants.

## **4. STAKEHOLDER INTERACTIONS**

The institutions and organizations, individuals and communities that influence the Group's activities constitute all our stakeholders. We work with all our stakeholders in an honest, respectful and responsible manner. We show the necessary sensitivity to ensure that the principles we have internalized are also applied by all our stakeholders. We act in accordance with our principles and universal standards in all our interactions.

### **4.1. Our Relationship with the Environment**

We are all responsible for maintaining a safe and healthy work environment, respecting the environment and conserving natural resources. When performing a task, we must not jeopardize our safety or the safety of other employees. Everyone in the Group is responsible for their own safety and that of their colleagues. This means:

- Complying with all applicable environmental, health and safety requirements;

- Complying with applicable laws and Group Policies regarding alcohol consumption while working, driving and acting on behalf of the Company so as not to impair our judgment and endanger others;
- Reporting unsafe working conditions to our managers;
- Carrying hazardous materials properly;
- Disposing of all waste in accordance with Group Policies and laws;
- Following safety procedures;
- Using resources efficiently;
- Implementing "recycling" processes wherever possible;

As a Group, we are committed to full compliance with both local legislation and universal principles regarding the environment and a clean society. We carry out all our priorities in this matter with the principles and rules we have adopted within the scope of corporate and social responsibility, taking into account what is best for the environment. In addition to our legal obligations, we aim to prevent waste and use resources efficiently, implement the best environmental solutions, and use environmentally friendly resources within the scope of zero waste, and we support all kinds of initiatives that will help raise awareness in this field and increase environmental awareness. We procure raw materials produced in an environmentally responsible manner and strive to reduce our environmental footprint. With this perspective, we aim to contribute to environmental sustainability.

As a demonstration of our commitment to sustainability, we source our raw materials responsibly and manufacture with respect for people, the environment and our planet. We support sustainable agriculture practices and strive to do our part as a corporation to prevent deforestation globally. We strive to protect ecosystems, take measures against climate change and aim to contribute to the sustainable transfer of biodiversity to future generations.

Wherever we operate, we take care to fulfill our environmental responsibilities to society in harmonious cooperation with our shareholders, employees, non-governmental organizations and other stakeholders. In all our activities, we identify and implement practices that will eliminate or reduce environmental problems, optimize energy use, ensure waste management and use natural resources in the most efficient way.

For more information, please see:

- [Corporate Social Responsibility Policy](#)
- [Corporate Social Compliance Policy](#)

## 4.2. Our Relationships with Our Business Partners

We act with integrity in our relationships with others and expect our business partners to adhere to this principle as well. Suppliers and business partners are essential for us to do business and meet the expectations of our stakeholders. Therefore, we select carefully and apply an objective selection process. We expect our commitment to ethics and compliance to be upheld by our suppliers and business partners in the same manner. When dealing with suppliers, customers, consultants, distributors, franchisees or other third parties:

- We give third parties a fair chance to compete for our business.

- Before engaging a third party, we assess whether there are any potential conflicts of interest.
- We select competent third parties with a reputation for quality and honesty.
- We ensure that all arrangements with third parties comply with applicable Group Policies.

Within the Group, payment is made only to the provider of goods or services. All invoices for the sale of goods or services must accurately and transparently reflect the items purchased or sold and their price, discounts, rebates or free goods. If, after engaging a third party individual or entity, we have concerns that there are indications of unethical conduct, we should always ask our manager or the TFI Internal Control, Compliance and Risk Management Department to guide us.

For more information, please see:

- [TFI Anti-Bribery and Anti-Corruption Policy](#)
- [TFI Supplier Evaluation and Acceptance Policy](#)

### 4.3. Our Relationships with Public Officials

In the countries where we operate, relationships with government officials and employees are subject to strict rules. Such relationships must comply with these rules and be conducted with integrity. We must not do anything that could be seen as an attempt to improperly influence the decisions of a government, its officials or employees. We must never offer anything of value that could be seen as a bribe or kickback payment. We must follow the Group Policies for guidance in this regard. We must remember that a bribe is not limited to the exchange of money, but may also include the promise or giving of a gift, hospitality, travel or favors. If a government executive or employee solicits or requests such a benefit, we must report it immediately to our managers and TFI's Internal Control, Compliance and Risk Management Department.

Facilitation payments, regardless of amount, are strictly prohibited. No payment shall be made for the purpose of expediting the performance of an official act unless such payments are expressly authorized by law and the schedule of such expediting fees is publicly published.

### 4.4. Our Relationships with Media

It is important to know what to do when dealing with the media. Press releases and interviews with news media outlets, equity analysts or investment bankers should only be conducted through authorized members of our executive team, the Chief Marketing Officer ("CMO"), Investor Relations and Corporate Communications Teams. Guiding principles are set out below:

- We must never comment on, confirm or end a conversation about any matter related to the company's business unless we are expressly authorized to do so by the company.
- If a member of the news media contacts us, we should refer them to the teams responsible for Corporate Communications.
- If an analyst, rating agency or investment banker contacts us, we should refer them to Investor Relations, the CFO, Corporate Communications Teams or the CMO, depending on the nature of the request.

- If an outside lawyer or government official contacts us about company-related matters, we must contact the Legal Department.
- If we receive a subpoena, legal complaint, subpoena or similar legal document in connection with company-related matters, we must immediately consult the Legal Department.
- We must not accept material or immaterial benefits from Media Agencies.

Social media includes any means of transmitting or publishing information or content of any kind or nature over the Internet, as well as through any other form of electronic communication, including our or someone else's blog, diary, personal website, social networking site, web newsletter or a chat room. We understand that social media can be a fun and engaging way to share our lives and views with family, friends and colleagues around the world, but when using social media, we must be mindful of our responsibility to the Company's reputation. The use of social media also involves certain risks and comes with certain responsibilities. To help make prudent decisions about the use of social media, we have developed a guide to the proper use of social media. We should carefully read the relevant guidelines, this Code and the Human Resources Handbook, and ensure that our posts are consistent with these policies. This includes;

- We should only express our personal opinions and never represent ourselves as a spokesperson for the Company.
- We should not represent or imply that our personal content and opinions are approved or authorized by the Company.
- To avoid misunderstandings, we should use a disclaimer where necessary, stating "The comments and postings on this site are my own and do not necessarily reflect the views of the Company".
- We should not share confidential or sensitive Company information and should respect the privacy of our colleagues and business partners.
- Inappropriate posts that may contain discriminatory remarks, harassment, threats of violence or similar inappropriate or illegal behavior will not be tolerated within the Group. We must always be aware that such posts may result in disciplinary action, up to and including termination of employment.
- For concerns and questions regarding social media, we should consult the Corporate Communications Teams and the Social Media User Guide.

For more information, please see:

- [TFI Social Media Usage Guide](#)
- [Human Resources Handbook](#)

## 4.5. Political Activities

Everyone is free to participate in political activities. However, in doing so, we must not create the impression that we are speaking or acting on behalf of the Group, unless we are part of the Company's Corporate Communications Team. It is our responsibility to comply with all relevant laws regarding political contributions. Contributing money, time, services or assets to a political candidate or political party on behalf of the Company is prohibited. If we have questions about

this topic, we should contact the Corporate Communications Team or TFI's Internal Control, Compliance and Risk Management Department for additional guidance.

## 5. MANAGEMENT OF CRISIS SITUATIONS

Within the Group, the establishment of separate crisis management/emergency management teams, consisting of, but not limited to, human resources, legal, information technologies, workplace physician, occupational health and safety specialist or operational units, has been encouraged for each subsidiary, and principles and roadmaps to be applied throughout the Group have been determined in order to be able to act quickly and in a controlled manner in any crisis or emergency. Together with the relevant teams, potential risks seen at a critical level across the Group and the impact of these risks on our business and operations have been positioned as crises. In this way, it is aimed to prevent possible crisis moments or to ensure that the Company processes can continue in the event that we face a crisis.

In the event of a possible crisis, we expect our other stakeholders, including Group employees, to act in accordance with emergency action plans, to gather quickly and assess the situation, to determine the type (natural disaster, industrial accidents, infrastructure collapses, physical security threat, reputational loss threat, legal crises, epidemic threat, cyber security threats, etc.) and size of the crisis, and to establish clear and open communication with the crisis management personnel authorized for this process in order to take action and prevent information pollution as a result of the situation assessment. The management and coordination of all information flow for these processes will be carried out by the teams responsible for corporate communications or human resources units. If we have any questions about this matter, we should contact the teams responsible for corporate communications or the Human Resources Department.

For more information, please see:

- [Crisis Handbook](#)
- [Emergency Action Plans](#)
- [Crisis Management Procedure](#)

## 6. REPORTING UNETHICAL SITUATIONS

### 6.1. Your Reporting Obligations – 'Make the Right Choice and Speak Your Mind!'

We attach great importance to honesty and accountability in all our work within the Group. In this context, it is our shared responsibility to oppose and report conduct that may be contrary to ethical standards, including our business ethics principles, or to report misconduct that we identify where an employee benefits themselves or others fraudulently or illegally. Therefore, we expect all employees and other stakeholders to act in accordance with all applicable policies, especially the TFI Whistleblowing Policy.

We encourage our employees to express themselves freely without any fear. Each of us is responsible for ensuring that our Company conducts its business in accordance with the principles of honesty, integrity and the highest ethical standards. In other words, if any employee suspects or is aware of a violation of this Code of Conduct, a Group Policy or any legislation, we expect them to report the suspected or actual violation. As stated in the TFI Whistleblowing Policy, employees are encouraged to raise any concerns they may have regarding any of the following:

- Bribery, corruption, money laundering and terrorist financing;
- A criminal act (or threat) or violation of any relevant law or regulation;
- Acts that lead to serious misconduct under laws, agreements or contracts (e.g., discriminatory practices, use of child labor, human rights violations);
- (Potentially) endangering the health, safety and security of the public or employees;
- Theft or fraud against the Group;
- Intentionally providing false information or making false statements to public institutions and investors by a senior manager or reporting expert;
- Violation of Competition Legislation (e.g., price fixing, sharing product cost information, sharing territories with competitors, rigging tenders);
- Financial fraud (e.g., manipulation of accounts, failure to comply with internal control procedures, embezzlement or making false declarations);
- Abuse of office;
- Breach of customer confidentiality or privacy;
- Disclosure of company secrets;
- Other conduct or acts that could have a negative impact on the reputation or financial standing of the Group as a whole.

Situations that are excluded from the scope of the ethics and reporting hotline are included in the TFI Whistleblowing Policy, and in case of any questions or doubts about the matter, we should consult our manager or the TFI Internal Control, Compliance and Risk Management and Internal Audit Department.

The principle of confidentiality is essential in all reporting processes and we report our whistleblowing and notifications as follows:

- **Level 1: Normal Reporting Channel:** Reporting to a manager or a higher-level manager.
- **Level 2: Ethics and Whistleblowing Hotline Channel:** Reporting directly to the Company officials, either anonymously or with identity known, through this channel.

The Ethics and Whistleblowing Hotline Channel, received by an independent service provider, is managed by the TFI Internal Control, Compliance and Risk Management Department. The Ethics Hotline is available 24/7 and the reporting channels are as follows:

- **Access by e-mail:** Group employees, business partners and stakeholders can make a report using the e-mail address [tfitabgida@etikhat.com](mailto:tfitabgida@etikhat.com).
- **Access via the web:** Group employees, business partners and stakeholders can make a report by logging in to [www.ataetikhat.com.tr](http://www.ataetikhat.com.tr) if they prefer. For those who wish to make an anonymous report, it is not mandatory to enter personal information such as name, surname, e-mail address, etc. Afterwards, the reporting process can be followed with the tracking number and password that appears on the screen.
- **Access by phone:** Group employees, business partners and stakeholders can make a report 24/7 via the phone number **0850 822 3845**.

All questions, opinions and violation reports received through these channels are reported to the Company officials within the same day. The information of those who wish to remain anonymous is not shared with the Company officials. All reports made are evaluated by the Company Ethics Boards and the TFI Ethics Committee at certain intervals and necessary actions are taken.

We also have the right to consult the TFI Ethics Committee before making a report, and in such a case, if we wish, we can use the e-mail address [etik@tabfoods.com](mailto:etik@tabfoods.com) before making a report.

## 6.2. Misuse of the Code of Conduct and Whistleblowing Policy

The Group wants to provide an environment where employees can express their concerns about misconduct in the workplace. As stated above, we evaluate all reports made in good faith and in accordance with the TFI Whistleblowing Policy. However, if it is determined that the reports are not made in good faith (e.g., malicious reports or personal grudges against another employee) or do not comply with the TFI Whistleblowing Policy, then the report itself will constitute misconduct. The relevant employee who makes a false report and acts contrary to this Code may be held liable for damages suffered by anyone harmed by such false report. The Ethics and Whistleblowing Hotline is not a platform for dealing with matters that are untrue and cannot be proven.

For more information, please see:

- [TFI Whistleblowing Policy](#)

*In the event of any discrepancy or conflict between the English and Turkish versions of this Policy, the Turkish version shall prevail.*