



Ülker No Deforestation, no Peat, no Exploitation (NDPE) & Biodiversity Policy

Ülker is committed to responsible sourcing and sustainable practices across its supply chain. This NDPE Policy outlines our commitment to eliminating deforestation, protecting peatlands, and ensuring the ethical treatment of workers and communities. We believe that sustainable practices are integral to the long-term success of our business and the preservation of the environment.

As part of our commitment, we are focused on enhancing our Beyond Cocoa program in compliance with the 2025 EUDR regulation, ensuring deforestation-free cocoa beans and full traceability to the plantation level. Our goal is to achieve 100% deforestation-free and traceable cocoa and palm oil across our entire product portfolio by 2030.

We commit to work in partnership with our suppliers in developing plans aimed at driving transformational change, preventing deforestation across our supply chains, and ensuring that we and our suppliers operate according to all applicable legal requirements in the no Deforestation, no Peat, no Exploitation arena.

The scope of this document covers high risk commodities palm oil and cocoa. Our suppliers, including third party suppliers, are required to apply the following principles across their operations and sourcing:

1. Zero Deforestation Commitment:

We commit to sourcing raw materials only from suppliers who adhere to a strict zero-deforestation policy. This means no clearing or conversion of natural forests and High Conservation Value (HCV) areas.

2. Forest & Biodiversity Preservation

- No deforestation and protection of forests and natural habitats through High Conservation Value (HCV)* areas and High Carbon Stock (HCS)** forests.

3. Reduction of Greenhouse Gases (GHG) Emissions & Soil Conservation

- No peatland destruction regardless of their depth.
- No burning to clear land for new developments or to re-plant existing developments.

4. Human Rights & Labour Conditions

- Compliance with Ülker's Human Rights policy.
- Internal grievance system in place, giving workers access to fair procedures and remedies.
- No Exploitation of people or communities, recognizing the rights of indigenous and local communities to give or withhold their free, prior and informed consent (FPIC) to the utilization of lands to which they hold legal, communal, or customary rights.

*High Conservation Value (HCV) approach outlined in the HCV resource network guidelines

**High Carbon Stock (HCS) defined in The HCS Approach Toolkit Version 2.0: Putting No Deforestation into Practice



5. Traceability & Monitoring

- Improved supply chain traceability to assist Ülker in achieving 100% traceability back to refineries, mills and cooperatives and improved year-on-year traceability rate back to plantations and farms.

6. Transparency

- External grievance system in place, allowing stakeholders to report breaches of NDPE principles.

High Level Implementation of the Policy

- Ülker will require suppliers to communicate this NDPE policy down their supply chains.
- Ülker will include this document in the standard terms and conditions of doing business.
- Ülker will partner with industry experts and NGOs to identify suppliers at risk, develop implementation plans and, when needed, organize capacity building sessions on NDPE principles.
- Ülker will work with suppliers to address non-conformances in Ülker's supply chain.
- Ülker will define key performance indicators to measure performance against NDPE policy and provide periodic progress updates.
- Ülker will take appropriate initiatives and potentially legal actions, if that supplier fails to comply with this policy or recommended remedial measure.
- Ülker will review this policy on a periodic basis to ensure it is fit for purpose and reflects a philosophy of continuous improvement. Changes will be communicated to suppliers accordingly.

We will engage with stakeholders, including NGOs, local communities, industry peers, and governments, to promote NDPE principles and drive collective action for sustainable development.

This NDPE Policy will be reviewed and updated as necessary to reflect new knowledge, changing circumstances, and advancements in sustainable practices.

Ülker believes that our commitment to No Deforestation, No Peat, and No Exploitation is vital to the health of our planet, the well-being of communities, and the success of our business. We are dedicated to implementing this policy across our supply chain and working collaboratively to create a sustainable future for all.

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