

OUTLINE of THE ENVIRONMENTAL MANAGEMENT SYSTEM of ÜLKER BİSKÜVİ A.Ş.

1. Objective and Scope

ÜLKER BİSKÜVİ SANAYİ A.Ş. (Company) has established a Sustainability Committee in charge of sustainability efforts.

These rules have been laid out to facilitate communication and coordination between the Sustainability Committee and Environment Management Systems in different production units (plants) and to provide an umbrella for variable Environment Management System practices, tasks, and responsibilities.

Another goal of this document is to allow stakeholders to quickly and easily access information on Environment Management System documents such as procedures, handbooks, plans, lists, and forms.

2. Preparation of the Environmental Policy

The Sustainability Committee prepares the draft of the Environmental Policy meant to improve the company's competitive position, corporate reputation, and relationship with stakeholders, and presents the policy to the Board of Directors.

The draft Environmental Policy is finalized by the Board of Directors.

3. Planning

3.1. Environmental Aspects

Each factory unit determines its own environmental aspects and conducts a risk assessment based on this determined environmental impact and its probability.

3.2. Legal and Other Requirements

The environmental requirements that are directly or indirectly related to the production processes and arising from the legislation and regulations, standards, and agreements that the company must comply with, are monitored carefully by the Factory Environment Unit.

3.3. Objectives, Targets, and Programs

Each factory unit specifies its own draft environmental objectives and targets on the basis of the determined environmental impact, their risk assessments, legislation, and other conditions.

The Sustainability Committee reviews the drafts of the environmental objectives and targets as well as the metric determination and risk assessment efforts along with legislation and other conditions and if necessary, finalizes the draft by working with factory authorities.

The Sustainability Committee consolidates and presents the finalized draft of the environmental objectives and targets of each Factory for the approval of the Board of Directors.

4. Implementation and Operations

4.1. Resources, roles, responsibility, and authority

The Environmental Objectives and Targets approved by the Board of Directors are implemented in the work process by each factory unit after the necessary resources, roles, responsibility, and authority have been determined. The authority and responsibility of ensuring that this implementation is completed on time and as needed rests with the Factory Director/General Manager.

4.2. Training and Awareness

The policy, Objectives and Targets, and related documents are circulated among managers and employees and necessary training is provided. Training programs are prepared and implemented by the Education Unit following the recommendations of the Sustainability Committee.

4.3. Communication

The Environmental Policy, Environmental Objectives and Targets, Environmental Commitment, Environmental Activities and all relevant Management Systems are shared with all employees and stakeholders at every possible and relevant opportunity in order to inform the community, encourage the community to contribute, and keep these elements relevant.

Communication of emergencies is particularly important.

The Sustainability Committee determines those responsible for communication, as well as the content and tools and media that will be used, which are then incorporated into the relevant procedures and documents by the factories.

4.4. Documentation

Relevant practices, checks, training, audit, and review activities regarding environmental management are documented in the form of procedures, handbooks, plans, lists, and forms in a manner that guides, makes compliance easy, and eliminates confusion. The documents contain features indicating that they are both up-to-date and valid.

The Sustainability Committee determines the type and content of documents that will be used within the Environmental Management System by taking the suggestions of the factories into account.

4.5. Control of Documents

The timeliness and validity of documents used by those involved in the environmental management efforts of different processes are checked regularly; outdated and invalid documents, except for those that have been archived, are destroyed.

The Factory Environmental Unit realizes the management of documents.

4.6. Operational Control

Operations, products and services that have or may have important impact on the Environmental Policy and the designated Environmental Objectives and Targets are determined. Necessary procedures that prevent undesired consequences are prepared, carefully implemented, and kept up-to-date.

Factory Director/General Manager is responsible for the control of operations.

4.7. Emergency Preparedness and Response

Necessary procedures determining the actions and operations that will prevent, limit, or reduce emergencies and accidents and their possible effects that could cause significant environmental consequences and ensuring the restoration of normalcy following an accident are implemented carefully and kept up-to-date.

The Factory Director/General Manager is responsible for the preparation, implementation, and timeliness of procedures.

5 Internal Controls

5.1. Monitoring and Measurements

Operations, products and services that have environmental impacts are monitored and relevant measurements are taken at critical points. The methods and tools used for monitoring and measurements should be checked and calibrated regularly.

Factory Environmental Units conduct or delegate monitoring, measuring, validation and calibration activities.

5.2. Evaluation of Compliance

Factory Environmental Units record the data, findings, results, and events that are relevant to the monitoring and measurements conducted to ensure that operations comply with Environmental Policy and the environmental performance parameters specified in the relevant documents. Records are included in periodical statistical reports by Factory Environmental Units and one copy is sent to the Sustainability Committee by the Factory Director/General Manager.

5.3. Nonconformity and Corrective and Preventive Actions

Status reports on nonconformity and corrective and preventive actions are prepared by the Factory Environmental Unit and one copy is sent to the Sustainability Committee by the Factory Director/General Manager.

5.4. Control of Records

The Factory Director/General Manager ensures that the data, findings, results, and events relevant to environmental influence and activities are recorded properly, that records are accurate and true, and that they are sufficient to measure whether the performance of factories are in compliance with the Environmental Objectives and Targets.

5.5. Internal Audit

The Company's Internal Audit Department determines whether environmental actions and operations, documents and records, monitoring, and measurements comply with designated procedures; whether these procedures are compliant with the Environmental Policy and with the Objectives and Targets; whether missions and responsibilities are internalized and carefully implemented; and whether necessary measurements and recording is conducted. The Department also detects improvement and update priorities, compiles the results into a report, and presents one copy of the report to the Sustainability Committee.

The Sustainability Committee consolidates the findings from the reports compiled by the Internal Audit Department and also from those stated in Articles 5.2, 5.3, 5.4 as well as from other reports of the individual factories and presents the findings to the Board of Directors.

6. Management Review

The Sustainability Committee reviews the Environmental Policy and the Environmental Objectives and Targets at least once per year and/or whenever necessary. Proposals for change are finalized by the Board of Directors.

The Sustainability Committee evaluates requests for change regarding implementation and operations.

The Sustainability Committee also considers the reports mentioned in 5.2, 5.3, 5.4, and 5.5 during its review.