

ATAKEY PATATES GIDA SANAYİ VE TİCARET A.Ş
MINUTES OF THE ORDINARY GENERAL MEETING HELD ON 2 JUNE 2026
MINUTES OF THE ORDINARY GENERAL MEETING

The Ordinary General Meeting of Atakey Patates Gıda Sanayi Ve Ticaret A.Ş. (“the Company”) regarding the 2025 financial year was held on 02 June 2026 at 10.30 am in the Pınar-1 Meeting Room of the Dedeman Istanbul Hotel, located at Yıldız Posta St. No:50, Gayrettepe, 34340 Beşiktaş/Istanbul - Pınar-1 Meeting Room, under the supervision of Mr **Sezer BEKTAŞ**, the Ministry Representative appointed by the Istanbul Provincial Directorate of Trade pursuant to its letter No. 122575730 dated 1 June 2026.

The notice of the meeting was published in the Turkish Trade Register Gazette, issue no. 11579 dated 08/05/2026, in accordance with the law and the Articles of Association, and included the date of the meeting and the agenda. Furthermore, the notice of the meeting was published on the Company’s website Electronic General Assembly System of Central Registry Agency’s, and the Public Disclosure Platform within the statutory timeframe, three weeks prior to the General Meeting date, excluding the day of the meeting.

It has been determined that the Ordinary General Meeting was conducted within the Electronic General Assembly System in accordance with the “Regulation on General Meetings to be Held in an Electronic Environment in Joint-Stock Companies”, published in the Official Gazette dated 28 August 2012 and numbered 28395, and the “Communication Regarding the Electronic General Meeting System to be Applied in General Meetings of Joint-Stock Companies”, published in the Official Gazette dated 29 August 2012 and numbered 28396.

It was noted that neither the shareholders nor their proxies raised any objections during the meeting; upon examination of the Company’s physical and electronic attendance registers, it was confirmed that the Company’s share capital, comprising 138,768,000 shares corresponding to a total capital of 138,768,000 TL, was represented by 63,568,-TL held in person and 110,544,000,-TL held by proxy, totalling 110,607,568,-TL, were represented at the meeting, thereby satisfying the minimum quorum required by both law and the Articles of Association. **Mr M. Furkan ÜNAL**, a member of the Company’s Board of Directors, and Ms **Zeynep Okuyan ÖZDEMİR**, representing **Güney Bağımsız Denetim ve Serbest Muhasebeci Mali Müşavirlik A.Ş.**, which conducted the independent audit of the Company’s financial statements for the 2025 financial year, were present at the meeting.

In addition to the above, after the Ministry Representative confirmed that the requirements set out in the Company’s Articles of Association, internal regulations and other relevant legislation had been met, the meeting was opened by Mr **M. Furkan ÜNAL**, a member of the Board of Directors, in both physical and electronic formats, and the discussion of the items on the agenda commenced simultaneously in both physical and electronic formats. Shareholders were informed that Group A shares carry preferential rights regarding voting and the nomination of candidates for the Board of Directors.

1. The meeting proceeded to the discussion of the first item on the agenda.

It was noted that a proxy for TFI TAB GIDA YATIRIMLARI A.Ş. had submitted a motion proposing the election of **Mr M. Furkan ÜNAL** as Chair of the Meeting. As no other motions were put forward, a vote was held on the written motion, and it was resolved by a unanimous vote of those present that **Mr M. Furkan ÜNAL** be elected as Chair of the Meeting.

The Chair of the Meeting, **Mr M. Furkan ÜNAL**, appointed Ms **Huriye TAM** as the Ballot Collector and Ms **Ezgi BAY** as the Minutes Secretary. In addition, the Chair appointed Ms **B. Burcu NERGİZ**, who holds the “Central Registry Agency Electronic General Assembly System Certificate”, to operate the Electronic General Meeting System.

2. The meeting proceeded to the discussion of Agenda Item 2.

The representative of TFI TAB GIDA YATIRIMLARI A.Ş. proposed that, as the Board of Directors’ Activity Report for the Company’s 2025 financial year had been made available for shareholders’ review at the Company’s headquarters, on the Central Registry Agency’s Electronic General Assembly system, the Public Disclosure Platform, and on the Company’s corporate website at least three weeks prior to the meeting date, the representative of TFI TAB GIDA YATIRIMLARI A.Ş. submitted a motion proposing that the aforementioned documents not be read out again at the meeting but be deemed to have been read. The motion was put to the shareholders for approval and was accepted unanimously by those present.

The Chairman of the Meeting, Mr M. Furkan ÜNAL, asked whether anyone wished to speak regarding the main agenda item, the Board of Directors’ Activity Report for the 2025 financial year. No one requested the floor.

3. The meeting proceeded to the discussion of the third agenda item.

The representative of TFI TAB GIDA YATIRIMLARI A.Ş. stated that, as the Company’s Independent Audit Report for the 2025 financial year had been made available for shareholders’ review at the Company’s headquarters, on the MKK’s Electronic General Assembly System, the Public Disclosure Platform, and on the Company’s corporate website at least three weeks prior to the meeting date, the representative of TFI TAB GIDA YATIRIMLARI A.Ş. submitted a motion proposing that the aforementioned documents be deemed to have been read out and not be read out again at the meeting. The motion was put to the General Meeting for approval and was accepted unanimously by those present.

The Chairman of the Meeting, Mr M. Furkan ÜNAL, asked whether anyone wished to speak regarding the Independent Audit Report for the 2025 financial year. No one requested the floor.

4. The meeting proceeded to the discussion of Agenda Item 4.

The representative of TFI TAB GIDA YATIRIMLARI A.Ş. proposed that, as the Company’s financial statements for the 2025 financial year had been made available for shareholders’ review at the Company’s headquarters, on the MKK’s Electronic General Assembly System, the Public Disclosure Platform, and on the Company’s corporate website at least three weeks prior to the meeting, the representative of TFI TAB GIDA YATIRIMLARI A.Ş. proposed that the aforementioned documents not be read out again at the meeting and be deemed to have been read. The aforementioned motion was submitted to the General Meeting for approval and was accepted unanimously by those present.

The Chairman of the Meeting, Mr M. Furkan ÜNAL, asked whether anyone wished to speak regarding the financial statements for the 2025 financial year, which was the main agenda item. No one took the floor.

The financial statements for the 2025 financial year were submitted to the shareholders for approval. Following the vote, it was decided by unanimous consent of those present at the meeting to approve the financial statements for the 2025 financial year.

5. The meeting proceeded to the discussion of Agenda Item 5.

The representative of TFI TAB GIDA YATIRIMLARI A.Ş. proposed that, as the Company's TSRS-compliant Sustainability Reports for the financial years 2024 and 2025 had been made available for shareholders' review at the Company's head office, on the Central Securities Depository's (MKK) Electronic General Assembly System, the Public Disclosure Platform, and on the Company's corporate website at least three weeks prior to the meeting date, it was noted that the representative submitted a motion proposing that the aforementioned documents be deemed to have been read out at the meeting and therefore not be read out again. The motion was put to the shareholders for approval and was accepted unanimously by those present. No other speakers took the floor.

As a result of the vote, it was decided by unanimous consent of those present at the meeting to approve the TSRS-compliant Sustainability Reports for the financial years 2024 and 2025.

6. The meeting proceeded to the discussion of Agenda Item 6.

Following the review of the Company's unaudited financial statements for the 2025 financial year, prepared in accordance with capital markets legislation, and taking into account the Company's investment and financing plans and cash position,

•For the financial period from 01.01.2025 to 31.12.2025, based on the Unaudited Financial Statements, the "Net Loss" of 79,751,042 TL arising during the period shall be transferred to the retained earnings account,

•A cash dividend of 97,137,600.00 TL (gross) to be distributed to shareholders representing a capital of 138,768,000.00 TL, at a gross rate of 70.00% and a net rate of 59.50%, from retained earnings;

•The cash dividend to be distributed from 4 June 2026," was read out and discussed. No one else took the floor.

The Board of Directors' aforementioned proposal was submitted to the General Meeting for approval, and it was resolved by unanimous vote of those present at the meeting to accept the Board of Directors' proposal regarding the 2025 financial year in its entirety, to carry out the profit distribution as specified in the proposal, and to authorise the Board of Directors to carry out the necessary actions and procedures relating to the profit distribution.

7. The meeting proceeded to the discussion of Agenda Item 7.

A discussion was opened regarding the discharge of the members of the Company's Board of Directors in respect of their activities and transactions for the 2025 financial year.

A vote was taken. It was resolved by a unanimous vote of those present to discharge all members of the Board of Directors who served during the 2025 financial year (*Board members did not vote in the discharge vote*).

8. The meeting proceeded to the discussion of Agenda Item 8.

In accordance with the regulations of the Capital Markets Board, information was provided to shareholders regarding the "Remuneration Policy" concerning the remuneration principles for Board Members and Senior Executives, and the payments made under this policy. **(Appendix 1)**

9. The meeting proceeded to the discussion of Agenda Item 9.

The meeting proceeded to the item regarding the remuneration of Board Members and Independent Board Members.

It was resolved by a unanimous vote of those present to pay each of the Board Members Erhan KURDOĞLU, Korhan KURDOĞLU, Erhan CANSU, M. Furkan ÜNAL, and the Independent Board Members Ayşe Ayşin İŞIKGECE and Halil Doğan BOLAK a monthly net attendance fee of 275,000.-TL.

10. The meeting proceeded to the discussion of Agenda Item 10.

The matter of granting authorisation to the Board members to carry out the transactions specified in Articles 395–396 of the Turkish Commercial Code was opened for discussion.

The Chair of the meeting, Mr M. Furkan ÜNAL, asked if anyone wished to speak. It was noted that no one wished to speak.

Following the discussion and vote, it was decided by a unanimous vote of those present to grant the Board of Directors members permission to carry out the transactions specified in Articles 395 and 396 of the Turkish Commercial Code. *(The Board of Directors members did not cast votes in the ballot.)*

11. The meeting proceeded to the discussion of Agenda Item 11.

In accordance with the Turkish Commercial Code and Capital Markets Board regulations, the proposal put forward by the Board of Directors; Maslak District, Eski Büyükdere Street, Orjin Maslak Plaza No: 27, Floors: 2-3-4, Flats: 54-57-59, Sarıyer 34485 Istanbul, registered with the Istanbul Trade Registry under number 479920-0, registered with the Bosphorus Corporate Tax Office under number 435 030 3260, and holding MERSIS number 0435030326000017, the selection of **Güney Bağımsız Denetim Ve Serbest Muhasebeci Mali Müşavirlik A.Ş.** as the independent audit firm for the 2026 financial year was discussed.

The approval of the selection of **Güney Bağımsız Denetim Ve Serbest Muhasebeci Mali Müşavirlik A.Ş** as the independent audit firm for the 2026 financial year was accepted by a unanimous vote of those present.

12. The meeting proceeded to the discussion of Agenda Item 12.

In accordance with the provisions of the Turkish Commercial Code, the Capital Markets Board and the Public Oversight, Accounting and Auditing Standards Authority ("KGK"),

the Board of Directors, having taken into account the opinion of the Audit Committee, proposed the following: Located at Maslak Mahallesi, Eski Büyükdere Caddesi, Orjin Maslak Plaza, No: 27, Floors: 2-3-4, Flats: 54-57-59, Sarıyer 34485 Istanbul, registered with the Istanbul Trade Registry under number 479920, registered with the Bosphorus Corporate Tax Office under number 435 030 3260, and holding MERSIS number 0435030326000017,

was discussed for selection as the independent audit firm to conduct the assurance audit of the sustainability report for 2026 in accordance with the Turkey Sustainability Reporting Standards published by the KGK, and to carry out other activities within this scope in line with the relevant regulations.

This matter was submitted to the shareholders for approval and was accepted unanimously by those present.

13. The meeting proceeded to the discussion of Agenda Item 13.

At the 2024 General Meeting, the upper limit for the Company's charitable donations and aid expenditure in 2025 was approved as 7.5 million TL, and within this scope, a total of 4,673,440 TL in donations was made in 2025: 3,673,440 TL to Afyonkarahisar Susuz Municipality for the purchase of an excavator-loader machine, and 1,000,000 TL to the TİGEM Sports Club Association.

Furthermore, it was decided by unanimous vote of the participants that the upper limit for donations to be made by the Company in 2026 shall be set at 15,000,000 TL until the date of the next ordinary general meeting.

14. The meeting proceeded to the discussion of Agenda Item 14.

Information was provided to the General Meeting regarding the income or benefits derived from guarantees, pledges, mortgages and sureties provided by the Company in favour of third parties during the 2025 financial year. It was reported that this is detailed in footnote 13 of the independent audit report.

15. The meeting proceeded to the discussion of Agenda Item 15.

The General Meeting was informed that no action had been taken in relation to Principle No. 1.3.6 of the Corporate Governance Principles.

16. The meeting proceeded to the discussion of Agenda Item 16.

Regarding the 2025 financial year, the General Meeting was informed about transactions conducted with "Related Parties" in accordance with the regulations of the Capital Markets Board. It was reported that this information is included in footnote 27 of the independent audit report. Furthermore, the conclusion section of the Related Party Report, approved at the Board of Directors' meeting held on 22 May 2026, was also published on the public disclosure platform on the same day.

17. The discussion moved on to item 17 on the agenda.

In accordance with Capital Markets Board regulations, information was provided to shareholders regarding the "Remuneration Policy". (**Appendix 2**)

18. The meeting proceeded to the discussion of Agenda Item 18.

The representative of TFI TAB GIDA YATIRIMLARI A.Ş. submitted a motion stating that, as the Company's "Code of Ethical Conduct Policy" had been made available for shareholders' review at the Company's headquarters, on the MKK's Electronic General Assembly System, the Public Disclosure Platform, and on the Company's corporate website at least three weeks prior to the meeting, the representative of TFI TAB GIDA YATIRIMLARI A.Ş. submitted a motion proposing that the aforementioned documents not be read out again at the meeting but be deemed to have been read. The motion was put to the shareholders for approval and was accepted unanimously by those present.

The Chairman of the Meeting, Mr M. Furkan ÜNAL, asked whether anyone wished to speak on the agenda item. No one took the floor.

Following the vote, in accordance with the Corporate Governance Regulation (II-17.1), it was decided by unanimous consent of those present at the meeting to adopt the Company's "Code of Ethical Conduct Policy". (ANNEX 3)

19. The meeting proceeded to the discussion of Agenda Item 19.

The representative of TFI TAB GIDA YATIRIMLARI A.Ş. submitted a motion stating that, as the Company's "Share Buy-back Policy" had been made available for shareholders' review at the Company's headquarters, on the MKK's Electronic General Assembly System, the Public Disclosure Platform, and on the Company's corporate website at least three weeks prior to the meeting date, the representative of TFI TAB GIDA YATIRIMLARI A.Ş. submitted a motion proposing that the aforementioned documents not be read out again at the meeting but be deemed to have been read. The motion was put to the shareholders for approval and was adopted by a unanimous vote of those present.

The Chairman of the Meeting, Mr M. Furkan ÜNAL, asked whether anyone wished to speak on the agenda item. No one took the floor.

Following the vote, in accordance with the Corporate Governance Regulation (II-17.1), it was decided by unanimous consent of those present at the meeting to approve the Company's "Share Buyback Policy". (ANNEX 4)

20. The meeting proceeded to the discussion of Agenda Item 20.

At our Company's Ordinary General Meeting held on 14 June 2024 regarding the 2023 Financial Year, the Share Buyback Programme, prepared in accordance with the relevant legislation, was approved and the Board of Directors was granted the authority to repurchase shares.

During the 2025 financial year, a total of 230,000 ATAKP shares were repurchased at a total cost of 9,317,587 TL.

In this context, as of 9 October 2024, the start date of the share buyback programme, a total of 361,000 ATAKP shares were repurchased by the Company using its own funds at an average price of 41.93 TL, at a total cost of 15,137,820 TL. The proportion of the repurchased shares to the Company's share capital is 0.26%.

None of the repurchased shares have yet been disposed of.

The meeting proceeded to the discussion of Agenda Item 21.

The meeting proceeded to the ‘Comments and Wishes’ item.

The Chair of the Meeting, Mr M. Furkan ÜNAL, asked if anyone wished to speak.

Mehmet Akif KORKMAZ, a shareholder, took the floor. He said, *“Tab Gıda appears to be the largest customer; what are the advantages and disadvantages of this situation? What are your thoughts on customer diversity? What measures are being taken regarding the drought? Finally, what are your forecasts regarding exports?”*

Ahmet ÖZGÜL, Chairman of the Executive Board, took the floor and said, *“First of all, I’d like to talk about the drought. We can’t grow just any type of potato; we can only grow potatoes approved by Burger King. We’re trying to minimise the risk here by growing them in over 20 provinces across Turkey. Tab Gıda is our main customer, and we are continuing to grow steadily; Tab Gıda’s share within Atakey will continue to increase.”*

M. Furkan ÜNAL took the floor, saying, *“Tab Gıda is a publicly listed company and one of the strongest in the sector; Tab Gıda’s growth is beneficial for Atakey as well; it is a valuable company within our ecosystem. “Regarding exports to China, as a group we have transferred our 1,600 restaurants in China. Potato sales continued for a while longer; however, as potato prices in Turkey remained higher than international prices, we were forced to reduce exports. Our export channels have weakened due to the strength of the Turkish Lira, but our negotiation processes with various countries are ongoing,”* he said.

TFI Tab Gıda Board Member Ziya Murat DEMİREL took the floor, stating, *“Previously, the target was to export 25 per cent of total production; the current strength of the Turkish Lira is not pleasing to exporters, which is why exports have slowed down at present, Turkey remains expensive; exports may come back onto the agenda if exchange rate policy or conditions change; our plans are, as before, to export a quarter of production.”*

Shareholder Levent ERTEM said, *“At a time when fried foods are under attack worldwide and healthy products are gaining popularity, what does Atakey foresee for the next five years?”* M. Furkan ÜNAL took the floor, saying, *“We continue to produce potatoes; R&D work is ongoing to ensure healthier production, and we have developed a diverse product range, such as cheese sticks and onion rings. As there is demand in the market, we are continuing to grow.”*

Executive Board Chairman Ahmet ÖZGÜL took the floor, stating, *“Frozen food is a category of healthy foods; frozen potatoes contain virtually no additives, only a starch-based coating. As long as this potato remains part of the Tab Gıda restaurant model, Atakey will continue to produce it.”*

Shareholder Erhan KALELİ asked, *“Will capacity expansion for coated products continue?”*

Executive Board Chairman Ahmet ÖZGÜL replied, *“Our facility has an annual capacity of ten thousand tonnes. Despite being the first year, the 2025 season was very successful; sales volumes exceeded twice the pre-project levels. We are satisfied with the progress there and believe we will manage the annual sales volume smoothly in the coming years as well. Should demand strain capacity, the issue you mentioned may come to the fore.”*

Erhan KALELİ indicated he had another question: *“What is the impact of the cogeneration plant on gross margins?”* Executive Board Chairman Ahmet ÖZGÜL replied, *“We have*

commissioned the cogeneration plant; our primary aim is not so much the positive impact on margins as the continuity of production. Our main objective is to prevent product loss due to power fluctuations. we have also taken into account factors such as natural gas prices, electricity prices, and the cost per kilowatt-hour; we believe it will have a positive impact on profitability in the future,” he said.

Best wishes were expressed for a prosperous 2026.

As no one else wished to speak, the Chair announced the closure of the meeting at 11.10 am.

Ministry Representative
Sezer BEKTAŞ

Chair of the Meeting
M. Furkan ÜNAL

Vote Counting Officer
Huriye TAM

Minute-taker
Ezgi BAY

Annex-1

Remuneration Policy

The purpose of this Remuneration Policy is to determine the principles governing the compensation of members of the Board of Directors, in alignment with the Company's applicable regulations and Articles of Association, while taking into account its long-term strategic objectives.

The Company complies with the Capital Markets Law No. 6362, the Turkish Commercial Code No. 6102, applicable capital markets legislation, and other relevant laws and regulations in its remuneration practices, and exercises due diligence in adhering to Corporate Governance Principles.

The remuneration principles for members of the Board of Directors and senior executives are presented as a separate agenda item at the General Assembly meeting, allowing shareholders the opportunity to express their opinions. This Remuneration Policy is also made available on the Company's corporate website.

Members of the Board of Directors may be paid a fixed monthly fee or attendance fee. The amount to be paid is determined at the General Assembly meeting.

A fixed remuneration for independent members of the Board of Directors is determined annually at the Ordinary General Assembly meeting and applies equally to all independent board members.

In order to preserve their independence, independent Board members are not granted profit share, share options, or performance-based compensation schemes. Their remuneration is determined at a level sufficient to maintain their independence.

Payments to independent Board members are made on a pro-rata basis, taking into account the duration of their service between their appointment and departure dates.

In addition to fixed remuneration paid to Board members and senior executives with executive authority, any bonuses, additional compensation, or other benefits are determined by the Board of Directors and, where applicable, the Corporate Governance Committee, taking into consideration market conditions and industry practices. Such remuneration components are disclosed to the public through the annual report.

Annex-2 Compensation Policy

The Company conducts its compensation practices in a fair and consistent manner within the framework of the Turkish Labor Law No. 4857 and the relevant legislation. Where applicable, Article 14 of the repealed Law No. 1475 (still in force) and the provisions of any applicable collective bargaining agreements are taken as the basis. The purpose of this policy is to safeguard employee rights, ensure consistency in practices, and manage all processes in compliance with applicable regulations.

Notice Compensation

The Company may terminate indefinite-term employment contracts for valid reasons arising from the employee's qualifications, conduct, or the requirements of the job, workplace, or business, provided that **written notice** is given and the reason for termination is clearly and explicitly stated.

Employees may also terminate their indefinite-term employment contracts in writing, subject to the applicable statutory notice periods.

The following statutory notice periods apply for indefinite-term employment contracts:

- Employees with up to 6 months of service: **2 weeks**
- Employees with 6 months to 1.5 years of service: **4 weeks**
- Employees with 1.5 to 3 years of service: **6 weeks**
- Employees with more than 3 years of service: **8 weeks**

If termination occurs without observing the applicable notice period, notice compensation shall be paid. Employees are also entitled to job search leave during the notice period.

Severance Pay

Severance pay is granted to employees who have completed at least one year of service, provided that the termination conditions specified under Labor Law No. 4857 entitle them to such payment.

Employees with more than one year of service are entitled to severance pay equal to **30 days of gross salary for each full year of service**. The calculation is based on the employee's length of service, wage, and the applicable statutory ceiling.

In the event of the employee's death, severance pay is made to the legal heirs.

Termination for Just Cause

Both the Company and the employee may terminate fixed-term or indefinite-term employment contracts immediately based on just causes specified under Articles 24 and 25 of Labor Law No. 4857.

Accordingly:

- For fixed-term contracts, termination may occur without waiting for the contract term to expire.
- For indefinite-term contracts, termination may occur without observing notice periods.

In cases where the employment contract is terminated pursuant to Article 25/II of the Labor Law, employees are not entitled to severance pay or notice compensation in accordance with the applicable legislation.

Annex-3

Code of Ethical Conduct Policy

INTRODUCTION

This Code of Ethics and Business Conduct (“Code”) has been established to define the minimum standards of conduct for all employees of ATAKEY PATATES GIDA SANAYİ VE TİCARET A.Ş. (“Atakey”) and for individuals acting on behalf of Atakey. All employees, regardless of the country in which they operate, their role, or seniority, are expected to comply with applicable laws and regulations, as well as Company policies and procedures.

This Code sets out the fundamental principles relating to respect for human rights, ethical business conduct, protection of company assets, stakeholder relations, crisis management, and the reporting of unethical conduct. References are made throughout this Code to Group policies, standards, and guidelines (collectively, “Group Policies”). For full versions of any Group Policy, employees should consult their manager, the Human Resources Department, or the TFI Internal Control, Compliance and Risk Management Department. All employees are responsible for understanding, complying with, and reviewing the Group Policies on an annual basis. Violations of this Code will be evaluated in accordance with the Disciplinary Regulations.

OUR VISION, MISSION, AND VALUES

Our Vision

To be a globally preferred brand in the frozen food industry, offering a diverse product portfolio and embracing a sustainable approach to production.

Our Mission

By offering high-quality and reliable food products through sustainable agricultural practices, we aim to contribute to the national economy, enhance stakeholder satisfaction, and embrace the concept of excellence through continuous improvement.

Our Core Values

- **Sustainable Agriculture:** We honor the land by promoting sustainable agricultural practices in collaboration with our agricultural engineers and farmers.
- **Efficiency and Technology:** We offer a variety of high-quality, delicious and reliable products in the fast-moving consumer goods sector
- **Quality Product Variety:** We attach importance to the efficient use of national Resources and contribute to the country’s industry through technology investments.
- **Stakeholder Engagement:** We support the participation of all stakeholders, including our customers, employees, farmers, suppliers and investors. We develop projects at increasing stakeholder satisfaction.

- **Continuous Improvement and Excellence:** With a sense of responsibility, we pursue continuous improvement and excellence at every stage of our operation

1. PROMOTION AND PROTECTION OF HUMAN RIGHTS

Atakey operates in line with the **Universal Declaration of Human Rights** and the principles of the **International Labour Organization (ILO)**. Equality, diversity, and inclusion are core principles.

Accordingly:

- Discrimination based on gender, age, ethnicity, religion, political opinion, disability, or any similar grounds is not tolerated.
- Mobbing, harassment, violence, and bullying are strictly prohibited and must be reported through designated channels.
- A safe, healthy, and productive working environment is ensured.
- Full compliance with Occupational Health and Safety regulations is mandatory.
- Forced labor and inhumane working conditions are strictly prohibited.
- Child labor practices comply with applicable labor laws, ILO conventions, and international standards.
- Working hours are regulated in accordance with Labor Law No. 4857.

2. ETHICAL AND LAWFUL BUSINESS CONDUCT

Atakey conducts all its activities in compliance with applicable laws and ethical standards, maintains accurate and transparent financial records, and adopts a zero-tolerance approach to bribery and corruption. Company assets are used solely for business purposes, conflicts of interest are avoided, and stakeholder rights are protected.

2.1 Legal Compliance

Atakey is committed to full compliance with applicable laws and regulations in all jurisdictions where it operates. Employees are expected to be familiar with relevant legislation, seek guidance when necessary, and conduct all activities lawfully. Non-compliance may result in disciplinary, civil, or criminal liability.

2.1.1 Protection of Inside Information

Non-public financial and commercial information is considered confidential and may only be shared with authorized parties. The use of inside information for personal gain, disclosure to third parties, or obtaining an advantage in capital markets is strictly prohibited. Market manipulation is not tolerated. Employees with access to inside information must comply with blackout periods and related procedures.

2.1.2 Personal Data Protection

Personal data relating to customers, employees, and stakeholders must be protected and processed solely for legitimate business purposes, in compliance with applicable laws and Company policies. Data protection is a shared responsibility, and breaches are not tolerated.

2.1.3 Competition Law

Atakey is committed to fair and free competition. Employees must not exchange competitively sensitive information such as pricing, customers, or market strategies with competitors, and must avoid anti-competitive agreements or practices. Violations may lead to severe legal and reputational consequences.

2.1.4 Anti-Bribery and Anti-Corruption

Atakey maintains a strict zero-tolerance policy toward bribery, corruption, and fraud. All activities must comply with anti-corruption laws, due diligence must be conducted on business partners, and suspicious activities must be reported. The Company supports prevention through ethics reporting mechanisms and internal controls.

2.2 Conflicts of Interest

Employees are expected to avoid situations that may create, or appear to create, a conflict between their personal interests and the interests of the Company. Conflicts of interest may harm the Company's interests and give rise to legal and reputational risks. All activities such as gifts, hospitality, sponsorships, donations, and external engagements must comply with Company policies. When in doubt, employees should consult management or the relevant compliance functions, TFI Internal Control, Compliance and Risk Management Department.

2.2.1 Gifts, Hospitality, and Business Meals

Gifts, hospitality, and business meals are a natural part of business relationships; however, practices that may compromise employees' objectivity or create the perception of a conflict of interest must be avoided. It is strictly prohibited to offer or accept gifts that influence—or appear to influence—business decisions, as well as gifts that are unreasonable in value, frequent in nature, or include cash or cash equivalents. No gifts or hospitality should be offered or accepted in dealings with public institutions. All gifts, hospitality, and business meals must be conducted in accordance with Company policies and defined limits, and all required recording and reporting procedures must be duly completed. Employees are expected to adhere to the rules and thresholds set out in the TFI Gifts, Hospitality and Business Meals Policy, and in all cases, consult the TFI Internal Control, Compliance and Risk Management Department.

2.2.2 External Positions and Interests

Employees' external roles, memberships, and financial interests are expected not to interfere with the impartial performance of their duties, create conflicts of interest, or harm Atakey's reputation. Any external positions or interests that may involve competitors, suppliers, or business partners must be approved by management and, where necessary, disclosed to the TFI Internal Control, Compliance and Risk Management Department.

2.2.3 Sponsorships and Donations

Sponsorships and donations must be conducted for legitimate, transparent, reasonable purposes aligned with the Company's values. Under no circumstances may such activities be used to obtain undue advantage, facilitate corruption, provide political support, or secure improper benefits. All processes must be carried out in accordance with relevant policies and procedures, supported by appropriate risk assessments and proper documentation. In cases of uncertainty, employees are expected to seek guidance from management and/or the TFI Internal Control, Compliance and Risk Management Department.

3. MANAGEMENT OF COMPANY ASSETS AND INFORMATION

3.1 Company Assets

Company assets include all resources of the Company, including physical equipment, financial resources, information systems, and confidential information. Employees are expected to use these assets carefully, efficiently, and solely for business purposes; to spend Company funds prudently; and to protect Company assets against loss, misuse, unauthorized access, or use for personal gain.

3.2 Confidential Information

Confidential information belonging to the Company must be safeguarded and shared only with authorized persons on a need-to-know basis. Employees are expected to implement the necessary security measures to prevent unauthorized access, disclosure, or misuse of confidential information, and to comply with Company policies and applicable regulations regarding information security, data privacy, and the protection of personal data.

3.3 Product and Service Representations

Atakey is committed to ensuring accurate and honest communication regarding its products and services and to avoiding any misleading statements. Maintaining food safety and quality standards is among our top priorities, and employees as well as suppliers are expected to comply with all relevant standards and legal requirements

4. STAKEHOLDER ENGAGEMENT

Atakey conducts its relationships with all stakeholders in line with the principles of integrity, respect, and responsibility. In all interactions, compliance with the Company's values, ethical principles, and universal standards is expected.

4.1 Environment and Sustainability

Atakey is committed to protecting employee health and safety, operating in an environmentally responsible manner, and using natural resources efficiently. Compliance with environmental, health, and safety regulations; proper waste management; support for recycling; and the promotion of sustainable practices are the shared responsibility of all employees. Atakey aims to responsibly source its raw materials, support sustainable agricultural practices, combat climate change, and protect ecosystems and biodiversity.

4.2 Business Partners

Atakey manages its relationships with suppliers and business partners based on principles of integrity, transparency, and fair competition. Business partners are selected based on objective criteria and are expected to comply with ethical standards, regulatory requirements, and Company policies. Payments must be made only to the relevant provider of goods or services, and all invoices and records must be prepared accurately and transparently. In case of any suspicion of unethical conduct, relevant managers and the TFI Internal Control, Compliance and Risk Management Department must be informed..

4.3 Relations with Public Officials

Relations with public officials and institutions must be conducted in full compliance with all applicable laws and Company policies. No benefit, gift, or payment may be offered to improperly influence decisions, and facilitation payments are strictly prohibited. Any such requests must be reported immediately to relevant management and authorized departments.

4.4 Media and Social Media

Communication with the media, investors, analysts, or public authorities on behalf of the Company may only be carried out by authorized representatives. Employees are expected not to make unauthorized statements about the Company and to refer any legal or official inquiries to the relevant departments. In the use of social media, personal views must not be presented as those of the Company, confidential information must not be disclosed, and content that may harm the Company's reputation must be avoided.

4.5 Political Activities

Atakey respects employees' rights to engage in personal political activities. However, providing political support on behalf of the Company, using Company resources for political purposes, or creating the impression of representing the Company is strictly prohibited. All political activities must comply with applicable laws and Company policies. For further guidance, employees should consult the TFI Internal Control, Compliance and Risk Management Department.

5. CRISIS MANAGEMENT

Atakey establishes crisis management teams and emergency response procedures to ensure a rapid, coordinated, and controlled response to potential crises and emergency situations. In cases such as natural disasters, occupational accidents, cybersecurity incidents, legal proceedings, or reputational risks, employees are expected to act in accordance with defined emergency plans, maintain clear communication with authorized teams, and avoid the spread of misinformation. Communication and coordination during crisis situations are managed by the Corporate Communications and Human Resources teams.

6. REPORTING UNETHICAL CONDUCT

6.1 Reporting Obligations

Atakey conducts all its activities based on the principles of integrity, transparency, and accountability. It is the shared responsibility of all employees to report any conduct that is believed to be contrary to

ethical rules, Company policies, or applicable legislation, including but not limited to bribery, corruption, fraud, human rights violations, competition law breaches, confidentiality breaches, and any other misconduct that may affect the Company's reputation. Employees are encouraged to raise ethical concerns without fear of pressure or retaliation. Reports may be submitted either to the relevant manager or through the Ethics and Whistleblowing Hotline, and all cases are handled under strict confidentiality principles. Matters excluded from the scope of the Ethics and Whistleblowing Hotline are defined in the TFI Whistleblowing Policy. In case of any questions or uncertainties, employees should consult their manager or the TFI Internal Control, Compliance and Risk Management and Internal Audit Departments.

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

- **Email access:** Group employees, business partners, and stakeholders may submit reports via tfitabgida@etikhat.com
- **Web access:** Group employees, business partners, and stakeholders may also submit reports through www.ataetikhat.com.tr. For submissions made via this channel, providing personal information such as name and surname or email address is not mandatory for anonymous reporting. A tracking number and password are generated on the screen, allowing the reporting process to be followed.
- **Telephone access:** Group employees, business partners, and stakeholders may submit reports 24/7 via the hotline **0850 822 3845**

All inquiries, feedback, and violation reports received through these channels are communicated to Company representatives on the same day. Information of individuals who choose to remain anonymous is not shared with Company representatives. All submitted reports are reviewed periodically by the Company Ethics Committees and the TFI Ethics Committee, and necessary actions are taken.

In addition, employees have the option to consult the TFI Ethics Committee prior to submitting a report. In such cases, they may contact etik@tabfoods.com before proceeding with a formal notification.

6.2 Misuse of the Ethics Policy

Atakey aims to provide a safe environment in which employees can raise concerns regarding ethical violations and inappropriate conduct. All reports made in good faith and in accordance with the TFI Whistleblowing Policy are handled under strict confidentiality, and employees are encouraged to speak up about ethical concerns. However, malicious, unfounded, or personally motivated reports are not accepted, and individuals submitting such reports may be held responsible for any resulting damages. The Ethics and Whistleblowing Hotline must be used solely for reporting actual, substantiated, and verifiable violations.

Annex-4

Share Buyback Policy

Atakey Patates may repurchase its own shares within the framework of applicable legislation, relevant capital markets regulations, and internal authorization procedures, with the objective of protecting investors and contributing to a stable market formation in its share price.

The processes related to share buybacks and the disposal of repurchased shares are carried out in accordance with Article 22 of the Capital Markets Law, the Communiqué on Repurchased Shares (II-22.1) issued by the Capital Markets Board (CMB), and the relevant announcements in force.

In order for the Company to repurchase its own shares, it is essential that the Board of Directors is authorized by the General Assembly. Within the framework set out in the relevant Communiqué, the Share Buyback Program is prepared by the Board of Directors and submitted to the General Assembly for approval.

Under the share buyback program, the following elements are determined and publicly disclosed in line with the applicable regulations:

- The purpose of the buyback
- The duration of the program
- The maximum number of shares to be repurchased
- The maximum price and total fund allocation
- The principles regarding the disposal of repurchased shares

The total nominal value of repurchased shares, including prior buybacks, may not exceed 10% of the Company's paid-in or issued share capital. The total consideration paid for buyback transactions must remain within the funding limits stipulated by the applicable regulations.

Repurchased shares are not taken into account in the calculation of quorum for General Assembly meetings, and the rights attached to such shares are exercised in accordance with the provisions set forth in the relevant legislation.

All required disclosures regarding share buyback transactions and the results of the program are made to the public in accordance with applicable regulations.

This policy is implemented in alignment with Atakey Patates' financial structure, investor relations practices, and capital markets approach, and is updated in line with any regulatory changes.

The Board of Directors is responsible for the Share Buyback Policy, which is submitted to the General Assembly for approval.