

ATAKEY PATATES GIDA SANAYİ VE TİCARET ANONİM ŞİRKETİ
FOR THE 2025 FINANCIAL YEAR
ORDINARY GENERAL MEETING HELD ON 02/06/2026
INFORMATION DOCUMENT

Our Company's Ordinary General Meeting regarding the 2025 financial year will be held on 02/06/2026 at 10:30 am in the Pınar - 1 Meeting Room at the Dedeman Istanbul Hotel, located at Gayrettepe, Yıldız Posta St. No:50, 34340 Beşiktaş/Istanbul, with the following agenda:

The Board of Directors Activity Report for the 2025 financial year and the Corporate Governance Principles Compliance Report attached thereto, the Financial Statements for the 2025 financial year, and the Independent Audit Report for the 2025 financial year, the Board of Directors' proposal regarding the distribution of profits for the 2025 financial year, the TSRS-compliant Sustainability Reports for 2024 and 2025, and the agenda items, along with the Information Document containing the necessary disclosures for compliance with Capital Markets Board regulations, will be made available for shareholders' review three weeks prior to the meeting, within the statutory timeframe, at the Company's headquarters, on the Company's corporate website at <https://atakey.com.tr>, on the Public Disclosure Platform, and on the Electronic General Assembly System ("e-GKS") of the Central Securities Depository ("CSD"), for shareholders to review.

In accordance with Article 1527 of the Turkish Commercial Code No. 6102, our shareholders may participate in the General Meeting in person or via electronic means and cast their votes.

The "Shareholders List" regarding the rights holders and their representatives attending the meeting is retrieved from the e-GKS prior to the commencement of the meeting. The "Shareholders List" is used to compile the list of those present. Verification of whether individuals physically attending the Ordinary General Meeting are shareholders or their representatives will be conducted via the aforementioned list.

Participation in the meeting via electronic means is possible provided that shareholders or their representatives hold an Electronic Signature Certificate. For this reason, shareholders intending to use the e-GKS must first obtain an Electronic Signature Certificate and register with the CSD's e-Investor: Investor Information Centre. Shareholders or their representatives who have not registered with the e-Investor: Investor Information Centre and do not possess a secure electronic signature will not be able to participate in the general meeting via the e-GKS.

Shareholders or their proxies who are "holders of electronic signatures" and wish to participate in the meeting electronically must complete their procedures in accordance with the provisions of the "Regulation on General Meetings to be Held Electronically in Joint-Stock Companies", published in the Official Gazette dated 28 August 2012 and numbered 28395, and the "Communication Regarding the Electronic General Assembly System to be Applied in General Meetings of Joint-Stock Companies", published in the Official Gazette dated 29 August 2012 and numbered 28396. Failure to do so will result in their inability to participate in the meeting via electronic means.

Shareholders who are unable to attend the meeting in person must ensure that their powers of attorney are drawn up in accordance with the legislation, or obtain a sample power of attorney from our Company's head office at Emirhan Cad. No:109 Kat:11 Balmumcu / Beşiktaş / Istanbul,

or from our Company's website at <https://atakey.com.tr> and must comply with the provisions set out in the Capital Markets Board's Series II, No. 30.1, 'Communiqué on the Exercise of Voting Rights by Proxy and the Collection of Proxies by Notice' ('**Communiqué**'), published in the Official Gazette dated 24 December 2013 and numbered 28862. Proxy forms that do not comply with the mandatory requirements set out in the Communication and the sample proxy form available on our website, or that have not been notarised, will under no circumstances be accepted due to our legal liability. Provided they comply with the principles set out in the Circular, the use of the attached proxy form is not required when appointing a proxy via the e-GKS within the framework of the CSD's regulations. Shareholders entitled to vote may appoint a proxy either via the e-GKS or by having the signature on the physically issued proxy form certified.

Shareholders participating in the general meeting electronically via the e-GKS may obtain information regarding the procedures and principles for participation, appointment of representatives, making proposals, expressing opinions and voting from the Central Securities Depository's website at www.mkk.com.tr.

Pursuant to Article 415(4) of the Turkish Commercial Code No. 6102 and Article 30(1) of the Capital Markets Law, the right to attend the general meeting and to vote may not be made conditional upon the deposit of share certificates. Consequently, there is no need for our shareholders attending the General Meeting to have their shares blocked with the CSD.

However, shareholders who do not wish to disclose their identity and details of the shares held in their accounts to the Company, and whose details are therefore not visible to the Company, must, if they wish to attend the General Meeting, they must contact the intermediary institutions where their accounts are held and ensure that the "restriction" preventing the disclosure of their identity and information regarding the shares in their accounts to our Company is lifted no later than one day prior to the date of the Ordinary General Meeting. Shareholders who fail to ensure the lifting of this restriction will not be able to participate in our Company's Ordinary General Meeting.

As the Ordinary General Meeting will be held electronically, we kindly request that our Shareholders be present at the meeting venue prior to the scheduled start time to ensure the meeting can commence on time.

ATAKEY PATATES GIDA SANAYİ VE TİCARET ANONİM ŞİRKETİ
BOARD OF DIRECTORS

ADDITIONAL EXPLANATIONS IN ACCORDANCE WITH THE CAPITAL MARKET BOARD REGULATION

The additional disclosures required under the Capital Markets Board's "Corporate Governance Communiqué" (II-17.1) relating to the agenda item have been provided in the following section, whilst our general disclosures are presented in this section for your information.

1. Information regarding the total number of shares and voting rights reflecting the Company's shareholding structure, and, if there are preference shares in the Company's capital, the number of shares and voting rights representing each class of preference shares, as well as the nature of such preferences:

The Company's issued share capital, which is fully paid up, amounts to 138,768,000.-TL within a registered capital ceiling of 550,000,000.-TL. The issued share capital is divided into 138,768,000 shares, each with a nominal value of 1.-TL.

The privilege granted to Group (A) shareholders pursuant to Article 8 of the Company's Articles of Association is as follows: Half of the members of the Company's Board of Directors shall be elected from among the candidates nominated by Group (A) shareholders, in accordance with the quorums specified in the Turkish Commercial Code and the Capital Markets Law. Should the number of Board members amount to a fractional number, the fraction shall be rounded down to the nearest whole number.

The Board of Directors shall elect a Chairman from among its members and, in the Chairman's absence, at least one Deputy Chairman to act on his behalf. The Chairman of the Board of Directors and the Deputy Chairman of the Board of Directors shall be elected from among the Board members nominated by Group (A) shareholders.

Furthermore, the privilege granted to Group (A) shareholders pursuant to Article 14.2 of the Company's Articles of Association is as follows:

At General Meeting sessions, each Group (A) shareholder present or their proxies shall have the right to cast 5 (five) votes for each Group (A) share and 1 (one) vote for each Group (B) share. Voting shall be conducted in accordance with the regulations set out in capital markets legislation.

The Company's shareholding structure is set out in the table below

SHAREHOLDER'S TRADING NAME FIRST NAME SURNAME	GROUP	SHARE IN CAPITAL (TL)	SHARE IN CAPITAL (%)
TFİ TAB GIDA YATIRIMLARI ANONİM ŞİRKETİ	A	20,000,000	14.41
TFİ TAB GIDA YATIRIMLARI ANONİM ŞİRKETİ	B	90,544,000	65.25
Publicly Traded Portion	B	28,224,000	20.34
TOTAL		138,768,000	100.00

2. Information regarding changes in management and operations that have occurred in the previous financial period or are planned for future financial periods, which will significantly affect the Company's and its Subsidiary's business activities, and the reasons for such changes:

There have been no changes in management or operations that would significantly affect the company's activities.

However, special situation disclosures made by our company in accordance with relevant legislation can be accessed via our corporate website at <https://atakey.com.tr> and the Public Disclosure Platform at www.kap.org.tr.

3. If the agenda of the General Meeting includes the dismissal, replacement or election of Board of Directors members; the reasons for dismissal and replacement, the CVs of individuals nominated for Board membership submitted to the Company; the positions they have held over the past ten years and the reasons for their departure, the nature and significance of their relationship with the Company and its related parties, whether they possess the requisite independence, and, should these individuals be elected as Board members, information regarding similar matters that could affect the Company's operations:

The agenda of the general meeting does not include the removal, replacement or election of Board Members.

4. Requests submitted in writing to the Investor Relations Department by shareholders regarding the inclusion of items on the agenda, and in cases where the Board of Directors has not accepted shareholders' agenda proposals, the rejected proposals and the reasons for rejection:

No such request has been submitted for the planned Ordinary General Meeting.

5. In the event that an amendment to the Articles of Association is on the agenda, the relevant Board of Directors' resolution, together with the old and new versions of the amendments to the Articles of Association:

There is no amendment to the Articles of Association on the agenda for the planned Ordinary General Meeting.

ATAKEY PATATES GIDA SANAYİ VE TİCARET ANONİM ŞİRKETİ
2025 FINANCIAL YEAR
AGENDA FOR THE ORDINARY GENERAL MEETING

1- Discussion and decision regarding the opening of the meeting and the formation of the Chairmanship,

In accordance with the Turkish Commercial Code No. 6102, the Regulation on the Procedures and Principles of General Meetings of Joint Stock Companies and the Representatives of the Ministry to be Present at Such Meetings, and the General Meeting Internal Regulations, the Chairperson of the General Meeting who will preside over the meeting shall be elected. The Chairperson shall appoint a Ballot Counter and a Minutes Secretary in accordance with the General Meeting Internal Regulations.

2- Reading and discussion of the Board of Directors' Activity Report for the 2025 financial year,

In accordance with the provisions of the Turkish Commercial Code, the Regulation and the Capital Markets Law, at least three weeks prior to the General Meeting date, at our Company's Head Office, on the CSD's Electronic General Meeting portal ("e-GKS") and on our Company's corporate website at <https://atakey.com.tr>, the 2025 Activity Report will be presented for the shareholders' review, and the Activity Report will be submitted to the shareholders for their consideration and approval.

3- Reading and discussion of the Independent Audit Report for the 2025 financial year,

in accordance with the provisions of the Turkish Commercial Code, the relevant Regulations and the Capital Markets Law, at our Company's Head Office at least three weeks prior to the General Meeting date, on the MKK's e-GKS and on our Company's corporate website at <https://atakey.com.tr/>, and information regarding the Independent Audit Report will be provided to the General Meeting.

4- Reading, discussion and submission for approval of the Company's financial statements for the 2025 financial year,

In accordance with the relevant provisions of the Capital Markets Board's regulations, the Turkish Commercial Code and the relevant regulations, at least three weeks prior to the General Meeting, at the Company's head office, and on the CSD's e-GKS and our website at <https://atakey.com.tr>; information regarding these financial statements will be provided to our shareholders at the General Meeting, and they will be submitted for discussion and approval by our shareholders.

5- Discussion and approval of the TSRS-compliant Sustainability Reports for the years 2024 and 2025,

in accordance with the provisions of the Turkish Commercial Code, the relevant Regulations, the Public Oversight, Accounting and Auditing Standards Authority ("KGGK") and the Capital Markets Law, will be made available for our shareholders' review at least three weeks prior to the General Meeting date at our Company's Head Office, on the CSD's e-GKS and on our

Company's corporate website at <https://atakey.com.tr> and information regarding these reports will be provided to the General Meeting, after which they will be submitted to our shareholders for discussion and approval.

6- The discussion and submission for approval of the Board of Directors' proposal regarding the distribution of profits for the 2025 financial year,

In accordance with the relevant provisions of the Capital Markets Board's regulations, the Turkish Commercial Code and its implementing regulations, the Board of Directors' Profit Distribution Proposal, which is available for review by our esteemed shareholders at our Company's headquarters three weeks prior to the General Meeting date, on the CSD's e-GKS and on our website at <https://atakey.com.tr>, the Board of Directors Profit Distribution Proposal and Profit Distribution Table, which have been made available for review by our esteemed shareholders, will be submitted to the General Meeting for approval (**Annex 1**).

7- Discussion and resolution regarding the discharge of Board Members from liability for their activities during the 2025 financial year,

In accordance with the provisions of the Turkish Commercial Code and the relevant Regulations, the matter of discharging all Board of Directors members who served during the 2025 financial year from liability for the Company's activities in 2025 will be submitted to the General Meeting for approval.

8- Providing shareholders with information regarding the "Remuneration Policy" for Board Members and Senior Executives in accordance with the Corporate Governance Principles, and payments made under this policy,

In accordance with Corporate Governance Principle No. 4.6.2 of the Capital Markets Board's "Corporate Governance Circular" No. II-17.1, the remuneration principles for Board members and senior executives have been formalised by our Company as a "Remuneration Policy", and this will be presented to shareholders as a separate item at the General Meeting, thereby affording shareholders the opportunity to express their views on the matter. The "Remuneration Policy" prepared for this purpose is set out in Annex 2.

9- Determining the remuneration of Board Members and Independent Board Members,

The remuneration of our Company's Board Members and Independent Board Members will be determined and submitted to the General Meeting for approval.

10- Discussion and decide on granting authorisation to Board Members to carry out the transactions specified in Articles 395 and 396 of the Turkish Commercial Code,

Our Board members may only carry out transactions within the framework of Article 395, paragraph 1, of the Turkish Commercial Code, titled "Prohibition on Transactions with the Company and Borrowing from the Company", and Article 396, titled "Prohibition on Competition", with the approval of the General Meeting. In order to comply with these regulations, the granting of the aforementioned authorisation to the members of the Board of Directors will be submitted to our shareholders for approval at the General Meeting.

11- Discussion and decision-making regarding the selection of the Independent Audit Firm for the 2026 financial year in accordance with the Turkish Commercial Code and Capital Markets Board regulations,

In accordance with the Turkish Commercial Code and the Capital Markets Law, the Independent Audit Firm proposed by the Board of Directors, taking into account the views of the Audit Committee, will be submitted to the General Meeting for approval.

12- Discussion and decision-making regarding the approval of the Independent Audit Firm proposed by the Board of Directors for the purpose of conducting the assurance audit of the Company’s sustainability report for the 2026 financial year and carrying out other activities within the framework of relevant regulations,

In accordance with the Turkish Commercial Code, the regulations of the KGK, and other relevant legislation, For the purpose of conducting the assurance audit of the Company’s 2026 financial year sustainability report and carrying out other activities within the framework of relevant regulations, the Independent Audit Firm proposed by the Board of Directors, taking into account the views of the Audit Committee, will be submitted to the General Meeting for approval.

13- Providing the General Meeting with information regarding the donations and contributions made by the Company during 2025 in accordance with Capital Markets Board regulations, and to determine and approve the upper limit for donations to be made until the date of the next Ordinary General Meeting,

In accordance with the regulations of the Capital Markets Law, information will be provided to the General Meeting regarding the donations and contributions made by the Company in 2025, and an upper limit will be determined for donations to be made until the date of the next Ordinary General Meeting.

14- Providing shareholders with information regarding guarantees, pledges, mortgages and sureties granted by the Company in favour of third parties in 2025, as well as any income or benefits derived therefrom, in accordance with the regulations of the Capital Markets Board,

In accordance with Article 12 of the Capital Markets Board’s Corporate Governance Circular No. II-17.1, the guarantees, pledges, mortgages and sureties provided by our Company and/or its subsidiaries in favour of third parties, along with the income or benefits derived therefrom, must be included as a separate item on the agenda of the Annual General Meeting; information on this matter will be provided to the General Meeting.

15- Providing information to the General Meeting in accordance with Principle 1.3.6 of the Corporate Governance Principles,

In accordance with Article 1.3.6 of the Capital Markets Board’s mandatory “Corporate Governance Circular” No. II-17.1, should shareholders holding controlling interests, members of the board of directors, managers with administrative responsibility, and their spouses and relatives up to the second degree by blood or marriage, enter into a significant

transaction that may give rise to a conflict of interest with the company or its subsidiaries, and/or carry out a commercial transaction falling within the scope of the company's or its subsidiaries' business operations on their own behalf or on behalf of another party, or join another company engaged in the same type of commercial activities as a partner with unlimited liability; such transactions shall be included as a separate agenda item on the agenda of the general meeting, with detailed information on the matter to be provided, and shall be recorded in the minutes of the general meeting.

In accordance with this provision, information will be provided to the General Meeting within the scope of the corporate governance principle set out above in the Corporate Governance Circular.

16- Providing shareholders with information regarding transactions conducted with “Related Parties” in the 2025 financial year, in accordance with the regulations of the Capital Markets Board,

Under this provision, information will be provided to shareholders regarding “Recurrent and Ongoing Related Party Transactions” carried out during the 2025 financial year, in accordance with the regulations of the Capital Markets Board.

17- In accordance with the Capital Markets Board's Corporate Governance Circular (II-17.1); providing shareholders with information regarding the Company's “Compensation Policy”

In accordance with the Capital Markets Board's Corporate Governance Communiqué (II-17.1) and relevant capital markets legislation, the “Indemnity Policy” prepared by our Company to determine the principles governing the remuneration of board members and executives with managerial responsibility, as well as the procedures and principles regarding compensation for losses they may incur in the course of their duties, will be presented to shareholders as a separate item at the General Meeting, thereby affording shareholders the opportunity to express their views on this matter. The “Indemnity Policy” prepared for this purpose is set out in **Annex 3**.

18- In accordance with the Capital Markets Board's Corporate Governance Circular (II-17.1); the Company's “Code of Ethical Conduct Policy” to be discussed and submitted to shareholders for approval

In accordance with the Capital Markets Board's Corporate Governance Regulation (II-17.1) and relevant capital markets legislation, the “Code of Ethical Conduct Policy” prepared by our Company to ensure that the Company's operations are conducted in accordance with ethical principles and rules and to strengthen corporate governance practices will be submitted to the shareholders for approval at the General Meeting. The “Code of Ethical Conduct Policy” prepared for this purpose is set out in **Annex 4**.

19- In accordance with the Capital Markets Board's Corporate Governance Regulation (II-17.1); the Company's “Share Buy-back Policy” is to be discussed and submitted to shareholders for approval

In accordance with the Capital Markets Board's Share Buy-back Communiqué (II-22.1) and relevant capital markets legislation, the “Share Buy-back Policy” prepared by our Company

to protect investor rights and interests and to establish the procedures and principles regarding share buy-back processes will be submitted to the shareholders for approval at the General Meeting. The “Share Buyback Policy” prepared for this purpose is set out **in Annex 5**.

20- Providing shareholders with information regarding the current share buy-back programme,

At the Ordinary General Meeting held on 14 June 2024 regarding the 2023 Financial Year, the Share Buy-back Programme (“**Programme**”), prepared in accordance with the relevant legislation, was approved and the Board of Directors was granted the authority to carry out share buy-backs.

In this context, shareholders will be informed regarding the share buybacks carried out by the Company.

21- Comments, good wishes and closing remarks.

ANNEX 1: DIVIDEND DISTRIBUTION PROPOSAL

ATAKEY POTATO FOOD INDUSTRY AND TRADE INC. 2025 Profit Distribution Table (TL)			
1	Paid-in / Issued Capital	138,768,000.00	
2	Total Statutory Reserve (According to Legal Records)	26,446,014.41	
If there is a preference regarding profit distribution under the articles of association, information regarding such preference		There are no preferential rights.	
		According to the CMB	According to Legal Records
3	Net Income	119,872,033.00	571,797,353.05
4	Taxes Payable (-)	199,623,075.00	33,059,186.52
5	Net Income for the Period (=)	-79,751,042.00	604,856,539.57
6	Losses from Prior Years (-)	0.00	0.00
7	First-Tier Statutory Reserve (-)	1,067,766.03	1,067,766.03
8	NET DISTRIBUTABLE PROFIT FOR THE PERIOD (=)	0.00	603,788,773.54
9	Donations Made During the Year (+)	4,673,440.00	
10	Net distributable profit for the period, including donations to be used for the first dividend	-75,077,602.00	603,788,773.54
11	First Dividend to Shareholders	0.00	
	- Cash	0.00	
	- No-par	0	
	- Total	0.00	
12	Dividends Distributed to Preferred Stockholders	0	
13	Dividends paid to board members, employees, etc.	0	
14	Dividends distributed to beneficiaries	0	
15	Second Dividend to Shareholders	0.00	
16	Second-Tier Statutory Reserve Fund	9,019,920.00	
17	Statutory Reserves	0	
18	Special Reserves		
19	EXTRAORDINARY RESERVES	0.00	497,631,253.54
20	Other Sources Intended for Distribution	97,137,600.00	0
	- Retained Earnings	97,137,600.00	
	- Extraordinary Reserves		
	- In accordance with the Law and the Articles of Association Other Distributable Reserves		

INFORMATION ON THE DIVIDEND PAYOUT RATIO				
DIVIDEND PER SHARE INFORMATION				
	GROUP	TOTAL DIVIDEND AMOUNT (TL)	DIVIDEND PER SHARE WITH A NOMINAL VALUE OF 1 TL	
			AMOUNT (TL)	RATIO (%)
GROSS	A	14,000,000.00	0.7000	70.00
	B	83,137,600.00	0.7000	70.00
	TOTAL	97,137,600.00	0.7000	70.00
	Withholding tax will be deducted from the gross dividend distributed in accordance with the tax laws in effect on the distribution date			
NET	A	14,000,000.00	0.70000	70.00
	B	70,666,960.00	0.59500	59.50
	TOTAL	84,666,960.00	0.61013	61.013

ANNEX 1: REMUNERATION POLICY

ATAKEY PATATES GIDA SANAYİ VE TİCARET A.Ş. 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 3: COMPENSATION POLICY

ATAKEY PATATES GIDA SANAYİ VE TİCARET A.Ş. 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 4: CODE OF ETHICAL CONDUCT POLICY

ATAKEY PATATES GIDA SANAYİ VE TİCARET A.Ş.

CODE OF ETHICS AND BUSINESS 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 tfiatabgida@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 5: SHARE BUYBACK POLICY

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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.