



Human Rights Policy

1. PURPOSE AND SCOPE

Tumay Seafood and its affiliated companies operate with an approach focused on efficiency and sustainability. It adopts an understanding that respects human rights for all its employees and all stakeholders with whom it has business relations, and aims to observe basic human rights throughout the society. In this context, they have created the Human Rights Policy (Policy).

1.1. The Universal Declaration of Human Rights and International Labor Organization (ILO) Conventions, United Nations Global Compact, United Nations Business and Human Rights Principles, OECD's Guiding Principles for Multinational Enterprises form the basis of the policy.

1.2. The policy covers primarily employees, business partners, and suppliers. Tumay Seafood and its affiliated companies convey the rules specified in the Policy to their employees in annual trainings. In order to encourage its employees as well as its business partners and suppliers to act in compliance with the principles in this Policy, it informs the Policy and includes it in the contracts.

1.3. The policy has been accepted by the Management as of 30 June 2021 and has been put into effect.

2. PRINCIPLE, COMMITMENT AND RELATED PRACTICES

Tumay Seafood and its affiliated companies within the scope of the policy;

2.1. Respect for Human Rights

In accordance with the Universal Declaration of Human Rights, it respects universal human rights in the countries where it operates and aims to prevent human rights violations. In addition, it respects the rights of indigenous peoples in the countries of operation by referring to the United Nations Declaration of the Rights of Indigenous Peoples.

2.2. Equal Opportunity, Respecting Differences and Diversity

Gender, language, religion, race, ethnicity, sexual orientation, nationality, age, pregnancy, marital status, union membership, political opinion and similar issues among employees in human resources processes such as remuneration, recruitment, personal and professional development, and in the business environment. It has an equal attitude without making any discrimination depending on the issue and does not tolerate discrimination in these matters. While executing its approach towards employees with the principle of right person for the right job, it manages processes take place transparently depending on the qualifications, experience and performance of the employees. It respects diversity, which is an important element of organizational structure.

2.3. Collective Bargaining Right and Freedom of Association

Respects employees' right to collective bargaining and freedom of association.

2.4. Freedom of expression

Tumay Seafood adopts the principle of preventing any situation that may hinder employees' right to freedom of expression in the business environment.



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2.5. Healthy and Safe Working

Tumay Seafood considers providing the conditions and work environment where they can work safely and happily to all its employees among its priorities and acts in line with the goal of "zero accident" in all its activities. Oversees full compliance with international principles and national laws and regulations regarding OHS; is committed to providing good practices beyond legal obligations.

2.6. Prevention of Abuse

Tumay Seafood does not tolerate incidents such as ill-treatment, intimidation and harassment in the business environment.

2.7. Forced Labor and Human Trafficking

Tumay Seafood strictly prohibits forced labor and human trafficking.

2.8. Child Labor

Tumay Seafood prohibits child labor in line with the principle of not employing child labor as set forth in the Declaration of Fundamental Labor Principles and Rights of the International Labor Organization.

2.9. Criminal Acts

Tumay Seafood does not take any initiatives that may result in a crime or violation of rights in the countries where it operates. In this regard, it expects employees to show sensitivity in the same direction.

2.10. Stakeholder Feedback

Tumay Seafood gives importance to the feedback and opinions of the stakeholders about the Policy. Policy-related feedbacks and possible policy violations and non-compliances can be reported via email at ezgi@tumaygroup.com, or by physically filling the form" on the www.tumaygroup.com web page or anonymous phone number (0232) 762 62 93. It can also be by contacting our company lawyer via (0232) 441 67 42 phone number.

3. COMPLIANCE, MONITORING, AUDIT AND REPORTING

3.1. The responsibility for human rights policy rests with the General Manager at the highest level.

3.2. The Company Management is responsible for the oversight of the determination and operation of notification, review and sanction mechanisms in case of non-compliance with the human rights policy, rules and regulations.

3.3. Tumay Seafood and its affiliated companies identifies possible human rights problems that may arise in their activities and the groups that will be most affected by these problems, and try to reduce and prevent these impacts in case of a negative impact on human rights. If human rights are at risk, necessary measures are taken by contacting the authorities.



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3.4. In order to report violations of compliance with the Policy, a system is established in which the identity of the whistleblower is kept confidential.

3.5. The policy is reviewed by Human Resources every two years and the implementation of the policy is followed up. In case of feedback from stakeholders, it takes action quickly and reviews the Policy.

4. RESOLVING POLICY NON-COMPLIANCES

4.1. Within the scope of the policy, formal and informal complaint mechanisms are developed in order to compensate for the rights violations committed by Tumay Seafood and its affiliated companies.

4.2 The Human Resources Department may seek expert opinion if it deems necessary, and may benefit from experts by taking measures that will not violate confidentiality principles during the investigation. All information and documents requested by the Human Resources Department during the investigation are given to the board. All employees have to assist the Human Resources Department in this regard.

No retaliation is made against any employee who raises concerns within the scope of the policy, and notifications are handled through processes that protect confidentiality. Failure to comply with the Policy may result in disciplinary or criminal action.

Tumay Seafood and its affiliated companies declare that they have set a target of 98% compliance with the Human Rights Policy until 2022.

5. ENFORCEMENT

The policy takes effect from 30 June 2021.

6. INFORMING THE PUBLIC

The policy has been shared with the public in English and Turkish. It is mandatory that the Policy be disclosed to all stakeholders, including all employees, and to the public. The same obligations apply in case of any change in the Policy.

GENERAL MANAGER
MEHMET DEMİRCİ
30.06.2021