



SOCIAL COMPLIANCE POLICY

Tumay Seafood and its subsidiaries, is an organization that sets itself the goal of acting with social responsibility awareness in all its activities and increasing the welfare level of its employees, as a part of the core values of respect for people and closeness to the public, at every stage of fish farming and processing. In this context, as Tumay Seafood. and its affiliated companies, we expect to manage the economic, social and environmental impacts of our activities responsibly and to keep the development of society on our agenda as a priority. We do not see the scope of our social responsibility understanding as limited to our business activities and their effects. We determine our understanding of social responsibility and our priorities in this regard, taking into account what is best for our employees, stakeholders, society and environment.

Being a party to the United Nations Global Compact, within the scope of SEDEX, ASC, GRASP standards that support corporate identity and development, operational strength, integrated sustainability, the importance and value of our employees, we state and commit to;

Prevention of Child Labor: Protecting children from all kinds of abuse, healthy development and institutional respect for the right to education, not employing employees under the age of 18, and acting in accordance with the procedures and principles of employing children and young workers,

Prevention of Forced and Compulsory Labor: No contractual or obligatory work can be done and the work will be on a voluntary basis,

Ensurance and Sustainability of Occupational Health and Safety: To consider minimizing any loss that may occur by creating a safer and healthier working environment as a priority target; To carry out a working system that prioritizes the general health of the employees, in line with the legal regulations on Occupational Health and Safety, and to effectively improve OHS practices according to technical developments and innovations,

Respecting the Freedom of Association and Representation and the Right to Collective Bargaining: Respecting the right of employees to join trade unions and collective bargaining, and the right to free and democratic representation through employee representatives,

Prevention of Discrimination: Age, gender, race, religion, language, ancestry, ethnic and national origin, social class, sexual orientation, belief, marital, social or economic status, disability, political opinion, participation and membership in union activities, family to take care not to discriminate in terms of responsibilities, illness, pregnancy or military service status, or any other condition that may cause discrimination, and to integrate mechanisms that prevent discrimination into its processes,

Recruitment, Regular Employment: In order to ensure the continuity of social compliance requirements, during recruitment, personnel selection, compliance with company rules and social compliance requirements as well as technical and professional knowledge will be considered as necessary and important criteria; starting from the recruitment phase, policies to prevent discrimination, harassment and ill-treatment will be valid in remuneration, performance and employment contract processes; regular employment and social security of employees will be ensured,

Discipline, Prevention of Harassment and Abuse: Based on the peace of the working environment and the happiness of the employees; to respect the dignity and personality of the employees, not to use corporate punishment; not to allow verbal, physical, psychological abuse, pressure, threat or coercion;

Raising Awareness: Believing that the basis of social compliance is conscious employees, to inform their employees about SEDEX, ASC, GRASP requirements during the recruitment phase and at certain periods during the working period;

Wishes and Complaints: Establishing alternative methods by which each employee can convey their wishes and complaints, establishing a suitable working environment by timely and effective evaluation and feedback, and that no retaliation will be made against the employee's wishes and complaints;



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Working Hours: To comply with the laws and regulations in force in the determination of working hours, on a voluntary basis in overtime, together with the principle of efficient working; Limiting the weekly overtime period in accordance with the Labor Law No. 4857, ASC, GRASP and SEDEX standards,

Wages and Payments: Not to pay wages below the minimum wage, to calculate and pay the overtime wages as stipulated by the law; To determine the minimum wage to be paid to the employees at a level that can meet the minimum living standard in the region where the enterprise is located, to pay and to continuously improve the conditions in this regard,

Compliance with Laws and Other Obligations: To act in accordance with applicable local laws and regulations and international regulations related to SEDEX, ASC, GRASP standards,

Bribery and Corruption: Giving, receiving or offering of bribery/corruption and/or commissions cannot be accepted under any circumstances. and will be treated within the framework of ethical rules,

Supply Chain Management: To receive social compliance commitments from suppliers, subcontractors and business partners, to evaluate each one in terms of social compliance, to follow the reasonable and adequate measures taken according to the evaluation results, and to support a mutual cooperation approach to continuously improve their social compliance levels.

**GENERAL MANAGER
MEHMET DEMİRCİ
27.09.2021**