



SABIRLAR FINDIK IHRACAT LTD.STI.

UNITED NATIONS GLOBAL COMPACT

COMMUNICATION ON PROGRESS REPORT

2016

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Statement Of Continued Support From The CEO of Sabırlar Fındık Ihracat Ltd. Sti.

To our stakeholders, business partners and organization members.

Sabirlar is family owned company in field of processing of Hazelnuts and exports 99% of its production to all business partners around the globe. Company first established in 1965 and we are very proud of being member of UN Global Compact signees. We also work with our sector partners, Government to establish sustainable hazelnut produce in Turkey. We join working groups, be part of ongoing projects and support 3rd party projects for sustainable hazelnuts production too.

I confirm that Sabırlar Fındık Ihracat Ltd Sti's support to Ten Principle of UN Global Compact will continue with increasing effort. We will work on all 10 principle on the areas of Human Rights, Labor, Environment and Anti-Corruption.

We infuse all these 10 principles into our business strategy, relation with workers and suppliers and daily operations. I believe our company will be achieving both its business and social goals while actively integrating these 10 principles too. We are committed to share this information with our clients using our primary channels of communication.

Sincerely Yours,

Hasan Osman SABIR CEO

15.April.2016

RABZON / TÜRKİYE Hizirbey V.D.735 001 6440

About Report

Sabırlar Fındık has become signatory of UN Global Compact in 2015.

Declared that 10 principles made of human rights, working conditions, environment and corruption fields integrated to all application and processes .

Sabırlar Fındık's applications under coverage of UN Global Compact's 10 basic principles are forming the subject of the report.

Corporate Profile / Shortly Sabırlar Fındık

SABIRLAR FINDIK is family owned company and dealing especially with HAZELNUT export since 1965. We are supplier of in-shell, Shelled and Processed Turkish Hazelnuts. We have started with small cracking plant, and in 1970's we made one of the first investment in processed hazelnuts . In 1989 we have made first integrated hazelnut processing plant. In 1997 we have added some more places for storage of raw and finished goods. In 1998 we have had the ISO 9002 certification. HACCP is implemented since 1999. And we have ISO 22000 by 2007 as well.

Company holds BRC Level A certificate since 2000 and in 2005 total warehousing/processing area expanded to 7500 sq.mt and in 2006 cool storage warehouse has been added as well. In raw and processed hazelnuts we use Laser Sorting, Echo- Sound system Sorting, Color Sorting and mechanical sorting sytems to reach lovest tolerances for foreign matters. Today we are approved supplier of many Multi-National confectionary and chocolate manufacturers and with about 10 000 mtons exports to 40 different countries.

SABIRLAR FINDIK from U.S.A. to Middle East and Europe to Far East many points is in our range of export;

"GERMANY,ENGLAND,FRANCE,BELGIUM,GREECE,ITALY, SWEDEN,SWITZERLAND,NORWAY,HOLLAND, ISRAEL,EGYPT,MALAYSIA,TAIWAN,TAILAND,CHINA, S.AFRICA, BOSNIA,SERBIA,UKRAIN,RUSSIA,U.S.A, LITHUANIA,LATVIA,BRAZIL,ARGENTINA,DUBAI,CANADA, IRAN,SPAIN,AUSTRALIA,LEBANON,POLAND,HONG-KONG, SAUDI ARABIA,AUSTRIA,CYPRUS,JAPAN, DENMARK,MACEDONIA"

Continual Attending Fairs

ANUGA – GERMANY

SIAL-FRANCE

FOODEX JAPAN

SWEETS MIDDLE EAST-DUBAI

<u>International Memberships</u> INC INTERNATIONAL NUT & DRIED FRUIT

AFI ASSOCIATION OF FOOD INDUSTRIES

UN GLOBAL COMPACT





Certificate #TR-2015-126499-Z-30195-2015 Page 1 of 1

CERTIFICATE

Documentary evidence delivered by ECOCERT S.A. - BP 47 - L'ISLE-JOURDAIN - FRANCE Based on the EOS certification program in force Accreditation by COFRAC # 5-0074 for Certification of Products and Services. List of accredited sites and scopes available on www.cofrac.fr

SABIRLAR FINDIK İHRACAT LTD.ŞTİ. Pazarkapı mah.Kalkanoğlu cad. No:34 **TRABZON - TURKEY**

Main activity : EXPORTER Secondary Activity(ies): PROCESSOR

has submitted his activities under control, and meets the requirements laid down in the ECOCERT ORGANIC STANDARD recognized as equivalent with the provisions of regulation (EC) No 834/2007. The following products can be sold under the categories as specified below:

Last inspection date :27.10.2015

Products to be marketed	Category of certification	Period of validity	
		From	Until
PROCESSED PRODUCTS			
Fruit-based preparations			
Blanched Chopped Hazelnut	Organic	16.11.2015	27.10.2016
Blanched Hazelnut Meal	Organic	16.11.2015	27.10.2016
Blanched Sliced Hazelnut	Organic	16.11.2015	27.10.2016
Blanched Whole Hazelnut	Organic	16.11.2015	27.10.2016
Hazelnut puree	Organic	16.11.2015	27.10.2016
Natural Chopped Hazelnut	Organic	16.11.2015	27.10.2016
Natural Hazelnut Meal	Organic	16.11.2015	27.10.2016
Natural Whole Hazelnut	Organic	16.11.2015	27.10.2016
Roasted Chopped Hazelnut	Organic	16.11.2015	27.10.2016
Roasted Chopped Hazelnut	Organic	16.11.2015	27.10.2016
roasted diced hazelnuts	Organic	16.11.2015	27.10.2016
Roasted Hazelnut Meal	Organic	16.11.2015	27.10.2016
Roasted Whole Hazelnut	Organic	16.11.2015	27.10.2016
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The authenticity and validity of this document can be verified on www.ecocert.com

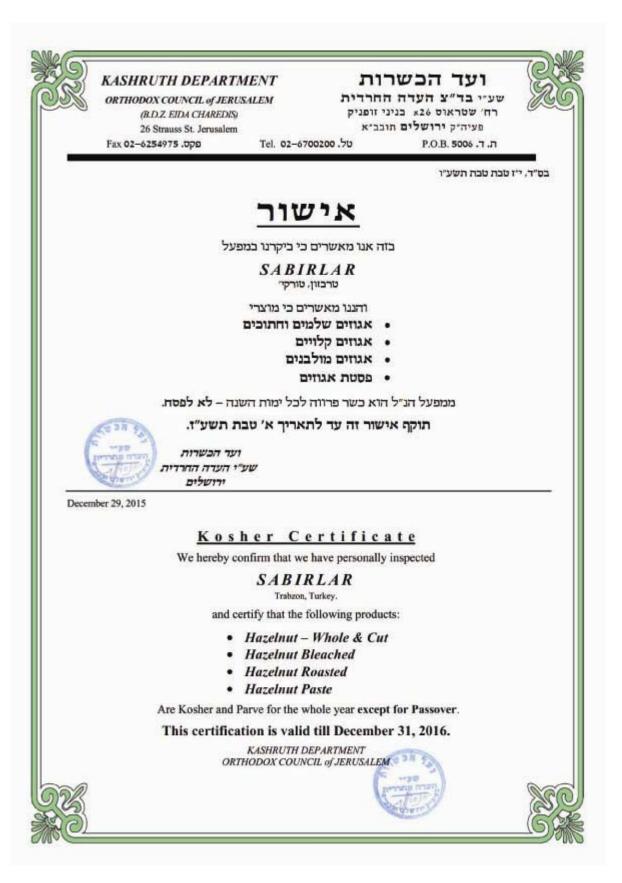
Issued in L'ISLE JOURDAIN

Stéphane LEROYER, certification manager

On 17.11.2015

ECOCERT SA - BP 47 - F-32600 L'Isle Jourdain Tél. +33-5 62 07 66 13 - Fax : +33-5 62 07 66 19 - www.ecocert.com

ECOCERT



15/126499/TURKEY/2-30194-J015 - 1/1

F-SC-384

ECOCERT



Organik Tarımın Esasları ve Uygulanmasına İlişkin Yönetmeliğin 37 inci Maddesi Hükümlerine Göre Müteşebbis Sertifikası

Müteşebbisin adı ve adresi	3. Yetkilendiril	miş kuruluşun adı, adresi ve kod
SABIRLAR FINDIK ÎHRACAT LTD.ŞTÎ. PAZARKAPI MAH.KALKANOĞLU CAD. NO:34 TRABZON - TURKEY Kontrol edilen saha(lar) - Erzurum yolu 8.Km. No:24 Akoluk Beldesi Me TRABZON TURKEY	numarası Ecocert Do 184 :	enetim Ve Belgelendirme Ltd. Şti. Sok. No :60/3 Bornova - İZMİR
Ana faaliyeti : İHRACATÇI - İŞLEYİCİ	P. 44.54	TR-0T-003
4. Ünün grupları / faaliyeti	5. Statü	Geçerillik dönemi
IŞLENMİŞ ÜRÜNLER Meyve bazlı hazır ürünler Kavrulmuş Fındık Unu Beyazlatılmış Dilinmiş İç Fındık Naturel Kıyılmış İç Fındık İndık püresi Beyazlatılmış Kıyılmış İç Fındık Naturel İç Fındık Naturel Findik Unu Kavrulmuş İç Fındık Kavrulmuş İç Fındık Kavrulmuş İç Findık Cavrulmuş Kıyılmış İç Fındık Cavrulmuş Kıyılmış İç Fındık	Organik Organik Organik Organik Organik Organik Organik Organik Organik Organik Organik Organik Organik	16.11.2015 27.10.2016 16.11.2015 27.10.2016
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8. Bu sertifika Organik Tarımın Esasları ve t nükümlerine göre yayınlanmıştır. Beyan edi	Uygulanmasına İlişkin Yör ilen işletmeçi kontrol/den	netmeliğin 37 inci madde
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Ecocert Denetim Ve Reinelen	dirme Ltd. Stl. , 184 Sok. 10:60/3	Steffi Bornous-tamie
Telefon: 0 232 3434360 Faks: 0 232 3	433959, d-posta office, furkers are to	and compared and complete



Certificate #TR-2015-126499-Z-30196-2015 Page 1 of 1

CERTIFICATE OF ORGANIC OPERATION

ECOCERT SA hereby confirms that the products listed below and produced and commercialized under responsibility of:

SABIRLAR FINDIK İHRACAT LTD.STİ. Pazarkapı mah.Kalkanoğlu cad. No:34 TRABZON TURKEY

are Certified Organic under the US National Organic Program 7 CFR Part 205.

Any reference to the organic production mode has to respect the rules as determined in Subpart D of the Rule. Any other rules of labeling as determined by national food acts have to be followed.

Date of initial NOP certification: 29/01/2013

Last inspection date(s) :27.10.2015

Desducte

Products	category of certification	scope of certification	
NATIONAL ORGANIC PROGRAM (NOP)			
PROCESSED PRODUCTS			
Fruit-based preparations	A & ADD M 1972	CO 49971	
Blanched Chopped Hazelnut	NOP "100% organic" product (205.301a)	Handling	
Blanched Hazelnut Meal	NOP "100% organic" product (205.301a)	Handling	
Blanched Sliced Hazelnut	NOP "100% organic" product (205.301a)	Handling	
Blanched Whole Hazelnut	NOP "100% organic" product (205.301a)	Handling	
Hazelnut puree	NOP "100% organic" product (205.301a)	Handling	
Natural Chopped Hazelnut	NOP "100% organic" product (205.301a)	Handling	
Natural Hazelnut Meal	NOP "100% organic" product (205.301a)	Handling	
Natural Whole Hazelnut	NOP "100% organic" product (205.301a)	Handling	
Roasted Chopped Hazelnut	NOP "100% organic" product (205.301a)	Handling	
Roasted Chopped Hazelnut	NOP "100% organic" product (205.301a)	Handling	
roasted diced hazelnuts	NOP "100% organic" product (205.301a)	Handling	
Roasted Hazelnut Meal	NOP "100% organic" product (205.301a)	Handling	
Roasted Whole Hazelnut	NOP "100% organic" product (205.301a)	Handling	
	End of document - Total : 1 page(s) Page 1 of 1		

This certificate is valid for the above mentioned products. Certification renewal must be done annually before the anniversary date. Once certified, a production or handling operation's organic certification continues in effect until surrender, suspension or revocation. The certificate must be returned to Ecocert on the day of cancellation of the certification contract or on suspension or revocation of the certification.

The authenticity and validity of this document can be verified on www.ecocert.com.

Anniversary date: 27/10/2016

Issued in L'ISLE JOURDAIN On 17.11.2015

Stéphane LEROYER Certification Manager for NOP

Accredited by the USDA effective 29 April, 2002. ECOCERT SA - BP 47 - 32600 L'Isle Jourdain Ph. +33-5 62 07 66 13 - www.ecocert.com - office.international@ecocert.com

ECOCERT



Sertifika





SABIRLAR FINDIK İHRACAT LTD. ŞTİ.

Pazarkapı Mah. Kalkanoğlu Cad. No: 34 Trabzon - TÜRKİYE

Aşağıdaki ürünler Haram maddeler içermemektedir. Müslümanların tüketimine uygundur The following products don't contain Haram ingredients, hence fit for MUSLIM Consumptions

المنتجات التالية لا تحتوي على مكونات مؤذية أو ضارة لذا فهي صالحة للأستهلاك الأسلامي

HELAL / HALAL / JAL

Bu belge aşağıdaki kapsam için geçerlidir; This certificate is valid for the following scope; يلاتلا لااجملا علع ةقي شول اهذه قبطنت

Raw and processed hazelnut

28/05/2014

14/05/2016

TR-H-01-0514-172

ة داه شلا مقر / Certificate no

يذيفنتل ا ريدمل / / Executive Manager

Accredited by JAKIM-MALAYSIA

KAS Uluslararası Sertifikasyon Göz. Tek. Kont. Hiz. Ltd. Şti. Kurtuluş Cad. No: 27 K: 3 Bornova İzmir-Türkiye

info@kascert.com www.kascert.com

Certificate of Registration



This is to certify that the quality management system of

SABIRLAR FINDIK IHR. LTD. STI.

Main Site: Akoluk Mah. Cumhuriyet Cad. No:24 Trabzon, Turkey

has been assessed and registered by Intertek as conforming to the requirements of:

ISO 9001:2008

The quality management system is applicable to

Production of all kinds of raw hazelnuts; raw whole, raw diced/sliced/meal and processed hazelnuts; roasted whole, blanched whole, roasted/blanched diced/sliced/meal and hazelnut paste.

Certificate Number: Issue Date: Certificate Expiry Date: Q 151040-01 11 November 2015 14 September 2018



Authonsed Signature: Calin Moldovean – President, Business Assurance Intertek Certification Limited, 10A Victory Park, Victory Road, Derby DE24 8ZF, United Kingdom

Intertek Certification Limited is a UKAS accredited body under achedule of accreditation no. 014.

In the issuance of this certificate, Intertex assumes no liability to any party other than to the Client, and then only in accordance with the agreed upon Certification Agreement. This certificate's validity is subject to the organisation maintaining their system in accordance with Intertex's requirements for systems certification. Validity may be confirmed via email at certificate validation@intertex.com or by scanning the code to the right with a smartphone.

The certificate remains the property of intertex, to whom it must be returned upon request.



CT-ISO 8001 2006-UKAS-EN-A4-P-20.jun.13

Certificate of Registration



This is to certify that the food safety management system of

SABIRLAR FINDIK IHR. LTD. STI.

Main Site: Akoluk Mah. Cumhuriyet Cad. No:24 Trabzon, Turkey

has been assessed and registered by Intertek as conforming to the requirements of:

ISO 22000:2005

The food safety management system is applicable to

Production of all kinds of raw hazelnuts; raw whole, raw diced/sliced/meal and processed hazelnuts; roasted whole, blanched whole, roasted/blanched diced/sliced/meal and hazelnut paste.

Certificate Number: Original Issue Date: Issue Date: Certificate Expiry Date: F 151040-01 12 November 2012 11 November 2015 11 November 2018



Authorised Signature: Calin Moldovean – President, Business Assurance Intertek Certification Limited, 10A Victory Park, Victory Road, Derby DE24 82F, United Kingdom Intertek Certification Limited is a UKAS accredited body under schedule of accreditation no. 014.

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The certificate remains the property of intertek, to whom it must be returned upon request.

CT-ISO 22000 2005-UKAS-EN-A4-P-20 jun 13



Certificate of Registration



Intertek Certification Ltd (UKAS 014) certifies that, having conducted an audit For the scope of activities: Sorting of Raw hazelnuts, Roasting, Chopping, slicing, grinding of Hazelnuts, packed in vacuum bags, jute bags and bigbags and Process of Hazelnut Paste, packed into drums and into tank trucks

Including voluntary modules: Exclusions from Scope: Product Category(ies): Audit Programme: None None 06 Announced

SABIRLAR FINDIK İHRACAT LTD. ŞTİ.

BRC Site Code: 1708251 Site Address: Akoluk Mah. Cumhuriyet Cad. No:24 61000 Ortahisar/ TRABZON Turkey Has achieved Grade: A

Meet the requirement set out in the

BRC GLOBAL STANDARD for FOOD SAFETY ISSUE 7: JANUARY 2015



Auditor Number: Certificate Number: Dates of Audit: Certificate Issue Date: Re-audit Due Date: 168140 251A1203003I 25-26 Feb 2016 18 Apr 2016 From 05 Feb 2017 To 05 Mar 2017 16 Apr 2017



Certificate Expiry Date: 16 Apr 2017

Calin Moldovean, President Intertek Certification Ltd – 10a Victory Park, Victory Road, Derby DE24 82F, United Kingdom

Intertek Certification Ltd is a UKAS accredited body under schedule of accreditation no. 014

In the issuance of this certificate, Intertex assumes no liability to any party other than to the client, and then only in accordance with the agreed upon Certification Agreement. This certificate's validity is subject to the corganization maintaining their system in accordance with Intertex's requirements for eysteme certification. Validity may be confirmed via email at certificate validation@intertex.com or by searning the code to the light with a smartphone.



If you would like to feedback comments on the BRC Global Standard or the audit process directly to BRC, please contact enquinee@broglobalstandards.com or call the TELL BRC hotline +44 (0) 20 7717 5959.

The certificate remains the property of intertex, to whom it must be returned upon request. "Not included in scope of accreditation.

SABIRLAR FINDIK VALUES

• Mission

• SABIRLAR FINDIK is committed to supplying the consumer and our customers with the finest, high-quality products and to leading the industry in nutrition research and education. SABIRLAR FINDIK supports these goals with a corporate philosophy of adhering to the highest ethical conduct in all its business dealings, treatment of its employees, and social and environmental policies.

• Vision

• Meeting consumer expectations at the highest level with a wide range of products by ensuring the right quality/price ratio.

Corporate Principles

- We are dedicated to understanding the needs and requirements of all our customer/supplier partners and trying to meet them while maintaining SABIRLAR FINDIK'S business objectives.
- We continually improve the quality of our goods and services through knowledge of our customer's requirements and by unrelenting dedication to improving our business processes (both physical and human).

We make profits by meeting the needs of customers using highly efficient business processes and managing our risk.

- We value experience and knowledge; we require aggressiveness, creativity and dedication which provide the menus to reach our goals.
- We manage by honest and objective evaluation of our performance against our goals for profit and customer/supplier satisfaction.

• Our Quality Policy

- Our company is dedicated to the highest quality in all the work we do. Quality is the uncompromising standard for our actions, and it flows from our passion and our pride in being part of the Sabırlar Fındık's community. Quality work, which results from our personal efforts, is the first ingredient of quality brand and the source of our reputation for high standards.
- Sabırlar will use highest food processing standards and also maintain highest possible hygienic & safety standards in processing plant. Our main quality targets are reaching highest customer satisfaction and maintain continuous improvement in our quality system. To reach targets we process under GMP&Hygienic standards with source of well trained personnel and with highest possible technological infrastructure. We produce quality itself instead of making control of it. And it has been assured in all process step

UNITED NATIONS GLOBAL COMPACT 10 PRINCIPLES

Human rights

Businesses should:

Principle 1: Support and respect the protection of internationally proclaimed human rights; and **Principle 2:** Make sure that they are not complicit in human rights abuses.

Labor Standards

Businesses should uphold:
Principle 3: The freedom of association and the effective recognition of the right to collective bargaining;
Principle 4: The elimination of all forms of forced and compulsory labor;
Principle 5: The effective abolition of child labor; and Principle 6: The elimination of discrimination in

employment and occupation

Environment

Businesses should:
Principle 7: Support a precautionary approach to environmental challenges;
Principle 8: Undertake initiatives to promote environmental responsibility; and
Principle 9: Encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

SABIRLAR FINDIK- UN GLOBAL COMPACT 10 PRINCIPLES IMPLEMENTATION

<u> 1- Sabırlar Fındık –Human Rights</u>

Sabirlar Findik is a corporate which shows respect and special care on preserving human rights and supporting performance in this field by policy and applications in business processes.

Our Human Rights Policy, along with being in accordance with <u>Universal Declaration of</u> <u>Human Rights</u> which provide the most widely accepted definitions of human rights, also in accordance with <u>International Labour Organization's</u>, <u>Declaration on Fundamental Principles</u> <u>and Rights at Work</u>

For this purpose; It's been following necessities of national – international legal legislation for it's workers, managers, clients, suppliers and other shareholders and it improves it's applications constantly.

Within the frame of our Human Rights Policy, under the roof of Sabırlar Fındık, any single individual from any language, religion, race, sex, politic and other views are equal regardless of their national and social origin. Every Sabırlar Fındık employee has right to give voice to his/her needs as long as they are sentitive towards others' rights and freedom and they don't threaten others' rights and freedom. Everyone has freedom to maintain his/her personal safety, his/her freedom and life. By this context, x that our employees are never subject to torture (neither physical nor psychological), rude, inhumane and/or disgracing attitude or punishment, assurance of that they have all legal and constitutional rights to relief in the contrary case, were given to our employees.

- ✓ Every empolyee of Sabırlar Fındık are responsible for application of Principle 1 and Principle 2, rules designated to provide these principles are being explained in detail in "Sabırlar Fındık Work Ethics Rules" document. This document is being hanged clearly visible on notice boards.
- ✓ Anyone among Sabırlar Fındık Employees who has a suggestion, complaint or request about anything, can express their feelings to employer written and/or oral via request boxes, chief or Human Resources Division.
- ✓ Managers of Sabırlar Fındık are working within "Open Door Policy". Employee from any level is free to communicate with the highest level manager orally or written. Also supporting a system where employees can hand in their requests and complaints anonymously to the highest superior.

- Principle of "trueness" is irreplaceable in Sabırlar Fındık's understanding of working. The company maintains it's relations with it's partners, employees, clients, suppliers and public, basing on openness and honesty.
- Sabirlar Findik cares for respectful attitude in relations with their employees/clients/suppliers/partners and public. Shows the deserved honorable attitude to everyone who they are in touch with.
- Sabirlar Findik is respectful and bound to human rights, bound to all law, rule and regulations, of the Republic of Turkey.
- Sabirlar Findik takes job honesty, reliablity, neutrality and loyalty to law as basis of choosing and assigning people like representitive, lawyer, broker agent, consultant.
- Sabırlar Fındık acts honest and fair to all of it's customers in a way to provide highest level customer satisfaction.
- Sabırlar Fındık focuses on building a structure which projects customer satisfaction and services with local understanding, adapts customs of the society it has been working in.
- As Sabirlar Findik protects intellectual properties like patent, trade secret, copyrights, name and brand etc, shows respect to it's rivals' intellectual copyrights.
- Sabırlar Fındık keeps informations (commercial, personal etc.) of suppliers, customers, employees and candidates who applied for work, confidential.
- Sabirlar Findik shows respect to laws, social values of every country it works in and works with sense of social responsibility.
- Mutual respect, trust and cooperation understanding is basic in relations between employees.
- Political, social or religious views can't be expressed or discussed in work environment.
- All employees fulfill the responsibilities to protect and improve the company's respected image. In this context, all employees care for their personal rights and acts to be within the moral and legal laws.

We, Sabırlar Fındık are followers for these rights to be understood and protected with respect by our employees and all shareholders.

2- Sabırlar Fındık-Work Standarts

Sabirlar Findik, suits verdicts of Work Labour which is being coordinated by T.C. Council of Ministers's 4857 issued law. Along with not paying less than minimum wage to any employee, if happens, has been paying overtime payments more than the legal limits.

If any free position has been found, announcements from several sources will be made. Suitable candidates will be invited to interview. After job interviews regarding our basic values had been made, most suitable candidate for the position will be offered a job. After the interview which concluded positive for both sides, job preparing of our fresh employee will be initiated.None of the employees being treated special in hiring process, especially personnels who apply for the same division are being evaluated under same conditions, same questions.

In order to carry out Work Force Principles, Sabırlar Fındık forms the following principles with trueness, honesty and by being bound to ethical values.

- **Child Worker:** None of our employees can be under the minimum working age designated by law. Necessary precautions were taken about that within our company. Employing personnel under 18 years old is absolutely forbidden in our company.
- Forced labor: None of the employees within the company can be worked by force. Voluntary basis is essential.
- Workplace Safety and Security: To form and maintain the work environment where safety and security conditions of the employees are created is essential. Developing and applying systems that prevent accidents and injuries are pledges of our company.
- **Discrimination:** Our employers can be discriminated in sex, age, race, language, religion etc. criteras under any circumstance. Assigning employees is based on suitability for qualities and performance they show in work.
- **Discipline Applications:** Employees can't be subject to physical and physchological violence under any circumstance.
- **Organization and Collective Contract Freedom:** All employees have right to organize with their free will. Therefore no employee can be subject to discipline punishment, wage cut, physical or phsychological violence.
- **Wage:** Employees being paid regarding minimum living standard determined by our company and contract, collective contract or similar contract that the company is a side of.
- Work Hours: Work hours are being applied suitable to work and extra work hours that are determined by legal limits and rights mentioned in laws, are being paid to employees in accordance with overtime verdicts.

These principles also apply for all suppliers of Sabırlar Fındık. Sabırlar Fındık refuses to work with suppliers who doesn't work suitable to criteras above.

Sabirlar Findik applies applications below equally and constantly to all of it's employees;

- ✓ Sabirlar Findik approaches to companies that it buys product and service from like a business partner, never compensates trueness and honesty and remains loyal to contracts.
- ✓ Sabırlar Fındık manages to give employee personal rights full/correct and in time.
- ✓ Besides business goals and competitive power of the company Sabırlar Fındık, cares for it's employees' self-improvement and takes steps towards it.
- ✓ Sabirlar Findik offers a happy and productive work environment to it's employees where values like honesty, consistency, respect, trust, responsibility rule; where each employee can express and improve himself/herself.
- ✓ Sabirlar Findik takes precautions with all necessary tools and procedures that are required for workplace safety and security.
- ✓ Sabirlar Findik absolutely doesn't accept any of it's employee being sexually, socially and physicially harassed or disturbed or causing similar discomforts.
- ✓ Sabırlar Fındık, acts in accordance with applicable law (law, rule, regulation) when buying product and service from suppliers.
- ✓ All employees do their work in egalitarian, transparent, accountable and responsible way.
- Workers in production are being supplied with work uniform aid, free transportation aid and unlimited hot beverage and opportunity of water dispenser.
- Participation of fresh graduates to business life is being supported in order to make newly graduated youngsters participate into the business world and gain experience.
- Pregnancy test is not demanded from applicant woman candidate or currently working woman employee. In case of pregnancy, in addition to process being monitored by the company doctor, legal resting and time off periods are being granted by legal periods. Fields where pregnant employees and newly birthed mothers can be more comfortable are being created. Moreover, opportunity of mass using maternity leave after returning to work post-birth is given. Female employees using the timeouts they deserve, as long as possible is being cared for. Fields where pregnant employees and newly birthed mothers can be more comfortable are being created.
- ✓ Improvements on work environments of disabled employees are being done and them being able to use time outs more comfortably is provided.
- ✓ As part of annual periodic examinations; respiration function test, lung graphy, audiometry tests are being done, evaluated and improvement activities are being applied if necessary.
- ✓ There is no gender discrimination in our company, moreover women are being supported to be in management positions within their careers. Sabirlar Findik is a company that has 120 employees. Today, 7 persons are white collared, 96 persons are blue collared woman personnel in our company.
- Employee personal rights are being respected and personal files are being archived properly.
- ✓ Considering requests from our employees and changing environmental conditions, we contribute to our employees' improvement with different education programs each year.

- ✓ Health control to our employees is being done in two days in a week by our workplace physician whose assigned by our contracted private work safety and security company.
- \checkmark All employees can access technical documents through the server.
- ✓ We have a wages policy that we apply for all of our departments and positions. And employees are being paid according to their positions.
- ✓ All employees can use their annual leaves that they deserved through the year comfortably.
- ✓ All employees in our company can work in; safe, suitable and hygienic work environments. For this purpose, we have 2 security personnels in our facility. Moreover cameras located in different parts of our facility are being used as precaution tool to maintain our employees' security. Again 5 cleaning personnel are being worked in our company as responsibles of cleaning.
- ✓ On addition to minimum wage standards being used in our company, bonuses depending on performances through the year are being given when it's necessary.
- ✓ All operations regarding Sabırlar Fındık's employee personal rights are being done by Human Resources department. In this department, woman personnel who has a master degree, is working as human resource manager.
- ✓ Work Safety and Security Trainings: Covers trainings that were designed regarding work environment and education subjects that are mandatory by legal regulations.By seeing current laws as minimum necessity, taking every chances to improve in order to go beyond this. As risk analysis, all precautions were taken and necessary improvements are being made every year regularly. Since all of our personnel have all the equipments needed by ISG rules, %90 of professional diseases are being precluded.
- ✓ Social compatibility and work safety and security audits are being done by different foreign customers every year, also by using these results, deficiencies are being resolved and positive result reports are being recieved from customers as feedback.
- ✓ Our employees can attend different educations suitable for their work through the year and their education fees and other expenses are covered by the company.

Our policy as Sabırlar Fındık, is to review these principles periodically and to present to the attention of all of our employees', subcontractors', shareholders' and if asked, public's.

Working Accident Events of last two years; 2 persons had minor working accidents in 2014. None of our employees had working accidents in 2015. None of our employees had working accidents in 2016 so far.

Consulting Company That We Buy Service From

For Work Safety and Work Security;

Kayra İş Sağlığı ve İş Güvenliği Merkez Özel Sağlık Eğitim Mühendislik Danışmanlık Hizmetleri Şti.

Some Trainings That Our Company Personnel Recieved in between 2013-2015;

Name of the Training	Training's Organizatior Institution	Period
English Course Training	TEOL Yabancı Dil Merkezi	6 months
Labour Law Training	İKEĞİTİM	16 hours
Personnel Affairs Training	GEMBA TEAM	16 hours
Fire Training and Drill	KAYRA DANIŞMANLIK	1 hour every year
The Huming and Dim		from time to time
Work Safety and Security	KAYRA DANIŞMANLIK	1 hour every year
Training		from time to time
Immediate Action Plan	KAYRA DANIŞMANLIK	1 hour every year
Training		from time to time
Noise Training	KAYRA DANIŞMANLIK	1 hour every year
		from time to time
First Aid Training	KAYRA DANIŞMANLIK	1 hour every year
Thist And Training		from time to time
Risk in Chemicals Training	KAYRA DANIŞMANLIK	1 hour every year
Risk in chemicals framing		from time to time
Importance of Environment	EYLÜL MÜHENDİSLİK	1 hour every year
and Results of Pollution		from time to time
Licenced SEDEX (Btype)	INTERTEK	4 hours
Training	II VI LICI LIC	Thous
BRC FOOD Internal Control	INTERTEK	16 hours
Training	II VI LICI LIC	10 nours
Hygiene Training	Mesleki Eğitim Merkezi	8 hours
BRC Version 7 Training	SAI GLOBAL	8 hours
TS EN ISO 9001 Basic	Türk Standartları Enstitüsü	16 hours
Training	Trabzon	
TS EN ISO 9001 Internal	TSE Trabzon	16 hours
Control Training		10 110 115
First Aid Training	İlk Yardım Eğitim Merkezi	16 hours
First Aid Training	KIZILAY Trabzon	8 hours
Improving Foundation	TÜREV Danışmanlık	4 hours
Culture and Work Discipline		
Training		
	1	<u>,</u>

✓ Our employees can attend on different trainings that are suitable for their works through the year. Education fees and other expenses they've done are covered by the company. Person or Foundation who provides trainings.



Subject : EDUCATION PLAN Period : JANUARY 2016

Subject of Training	Person or Foundation Who Provides Trainings	Planned Training Dates	Happening Dates of Trainings	Training Period
BSCI Social suitability supervision	Social Supervision	15.01.2016	15.01.2016	1 Hour
information training Improving foundation culture and work discipline training	Responsible. Türev Danışmanlık	30.01.2016	30.01.2016	3,5 Hours
Usage, control and cleaning of metal detectors and magnets	Aysel EROL	05.02.2016	05.02.2016	1 Hour
ISO 22000 Food Safety Management System Training	Food Safety Team Leader	25.03.2016	25.03.2016	1 Hour
SO 9001 Information Training	Quality Responsible	27.05.2016		1 Hour
BSCI Social suitability supervision training Performence evaluation training				
Quality and Food Safety Management System Documentation Training				
ISO 9001:2015 Quality Management System Current Training		April/May 2016		
BRC 7. Version 7 information and internal inspection training Informing cleaning personnel about cleaning equipment and cleaning directions	Quality Responsible	12.05.2016		30 mins
Reviewing physicochemical analysis	Quality Responsible	15.04.2016		30 mins
Preserving Conditions of Chemicals	Quality Responsible	15.04.2016		30 mins
ISO 22000 Quality Management System Training	Food Safety Team Leader	24.06.2016		1 Hour
Allergen Training	Food Safety Team Leader	22.04.2016		1 Hour
Security Procedure and TACCP	Food Safety Team Leader	23.09.2016		1 Hour
ISO 22000 Quality Management System	Food Safety Team Leader	22.12.2016		1 Hour
Training Work Safety Security information training	Work Safety and Security Responsible Environment Responsible.	16.11.2016		8 Hours
Importance of Environment and Results of Pollution	Work Safety and Security Responsible Environment Responsible.	23.12.2016		1 Hour
Prepared by	·	Approved By	1	1
Quality Manager		Tic. Gen. Yard.		

 ✓ Sabırlar Fındık prepares an annual training plan in January every year and aims to make all of them on regular dates. Table above contains our training plan for 2016.

3- Sabırlar Fındık-Enviroment

Emphasising on sustainable advancement in environment management and contributing to life standard, idea to support technological advancement and caring for protection of the environment as Sabırlar Fındık, we appropriate high standards towards environment

Sabirlar Findik does it's activities suitable to legal requirments without harming environment and health, in a secure way and carries responsibility to keep the environment it lives and works in clean and acts to keep it safe.

By this context, in order to protect environment Sabırlar Fındık;

Caring for most efficient and productive usage of natural resources and any kind of energy resource, putting waste (solid, liquid, gas) and noise pollution under control, reducing the negative impact of production processes on human health and raising awareness is aimed by providing trainings about protecting environment to all employees.

We use, try to use the most suitable methods that reduce impact of waste that was created from production process on environment to minimum possible level, reducing natural resource usage.

We follow health, security and environment regulations on producing, transporting and marketing our product and we appropriate higher standards beyond these regulations. We maintain operations in our facilities secure, suitable to environment, social conditions and employees' needs. We labor over raising awareness on environment and health issues to all groups that we are related with.

Sabırlar Fındık has been going around Environment Management System, integrated with Quality Management System and has been improving it constantly.

- Sabırlar Fındık, maintains it's activities according to national quality standards like TSE and international quality standards like ISO, BRC and looks after it's quality certificates with all of it's employees.
- Sabırlar Fındık doesn't use any additives that are known to be harmful to human health, whole ingredients of the product are clearly stated on package.
- Sabırlar Fındık absolutely cares for health and hygiene disciplines in production and marketing processes.
- Sabırlar Fındık doesn't provide product or service which can harm or deceive it's customers.

- ✓ Electric energy consumption has been reduced by replacing lightning systems used in Head Office and production fields with led armatures. Moreover, switched to otomation system that is sensitive to hours of work in conditioning processes to save energy.
- Environmental harm is being minimized by recycling waste for reuse via licenced recycling companies.
- ✓ Quality, Environment, Work Safety and Security Policies hand book, is being announced to all employees and relevant shareholders with help of web page, boards, trainings and meetings.
- ✓ By using environment friendly products, negative effects that appear as a result of all processes to climate change, air, soil and water being minimized. Considering negative environmental effects that could appear during or after usage of the products, raw materials that don't have any risk of pollution and health are being used.
- ✓ Sabirlar Findik emphasised on sharing it's environmental effects, applications, safety and security incidents with third parties within the frame of transparency policy. Doing/Getting it done the necessary announcements is under General Manager's responsibility. All complaints from 3rd parties/all shareholders, requests are being archived within General Manager's knowledge and what is necessary has been done.

Consulting Companies That We Buy Service From

For Environment;

Eylül Mühendislik Hizmetleri Şti.

Eylül Çevre Elektrik Elektronik Makine Mühendislik Danışma Hizmetleri Şti.

Aşuroğulları Tehlikeli Atıklar Ön İşleme Ara Depolama Nak.ve Hurda Sanayi Şti.

Chimirec Avrasya Endüstriyel Atık Sanayi Şti.

Rentokil Initial Çevre Sağlığı Sistemleri Ticaret ve Sanayi A.Ş.

NPM Çevre Sağlık Sistem Hizmet Sanayi Şti.

Sabırlar Fındık 01.07.2013-30.06.2014 Term Electric Consumption

TERM	CONSUMPTION (KWH)
JULY 2013	60.498,90
AUGUST 2013	48.248,95
SEPTEMBER 2013	60.041,00
OCTOBER 2013	62.986,00
NOVEMBER 2013	67.400,00
DECEMBER 2013	63.716,00
JANUARY 2014	68.957,00
FEBRUARY 2014	55.417,00
MARCH 2014	62.941,00
APRIL 2014	41.481,00
MAY 2014	39.639,00
JUNE 2014	54.401,76
TOTAL	685.727,61

Sabırlar Fındık 01.07.2014-30.06.2015 Term Electric Consumption

TERM	CONSUMPTION (KWH)
JULY 2014	46.037,00
AUGUST 2014	35.954,73
SEPTEMBER 2014	71.761,30
OCTOBER 2014	57.419,06
NOVEMBER 2014	55.667,43
DECEMBER 2014	59.898,00
JANUARY 2015	47.737,00
FEBRUARY 2015	52.839,00
MARCH 2015	52.914,00
APRIL 2015	46.482,00
MAY 2015	46.067,00
JUNE 2015	36.626,00
TOTAL	609.402,52

 ✓ Our company's last two terms of electric consumption were presented on the tables above. As it can be seen in tables, our electric consumption this year has been reduced by %11 compared to last year.

4- Sabırlar Fındık-Anti Corruption

Our policy is to make a global, coordinated commitment on following laws regarding corruption and bribery in countries we work or desire to work by forbidding illicit payments and any other inappropriate actions.

Principle of the company is to only work with sides who are known for being honest and qualified.Our company will form appropriate procedures to be able to study to determine ethical values on sides who'll be in business relationship with itself and third parties who can have any kind of contact.

Sabırlar Fındık's corporate ethical responsible is obliged to interpret and apply the following principles under supervision of board of directors. When necessary, corporate ethical responsible or persons assigned by him/her, give orders to put these principles into practice and follow it's application.

- Personnel of our corporation; related to his/her work or not, by any means cannot benefit from or mediate by his/her title or authorizations for himself/herself, his/her relatives or third parties.
- Personnel of our corporation, cannot benefit from anything apart of wage and other personal rights granted to him/her in exchange of his/her administration of public service.
- Personnel of our corporation cannot use official or confidential informations that he/she recieved while performing his/her duties or as a result of his/her duties, to benefit himself/herself, his/her relatives or third parties economically, politically or socially, directly or indirectly, cannot explain to any institution, foundation or person apart from competent authorities while on duty or not.
- Prohibition of recieving gift and benefiting: Personnel of our corporation, cannot directly or indirectly accept a gift that affects or has possibility to affect his/her objectivitiy, performance, decision, working which has economic value or not, which has an economical value or not.
- Personnel of our corporation, cannot send a gift by using public resources in incidents that have no connection with duty or service, apart from official ceremonies or holidays cannot send flower or wreath to any natural or legal entity.
- Usage of public property and resources: Personnel of our corporation, cannot use or let someone use the buildings, vehicles and other properties, sources of corporation apart from using it for corporation's goals and service necessities. Protects and takes required precautions to ready them to serve in any moment.

By this policy text, it was aimed to protect the company's image and to present commitments regarding bribery and corruption and our approach in this matter clearly.

By this policy which is complementary part of Sabırlar Fındık Ethic Rules it was aimed to, make the necessary briefing to prevent bribery and corruption in all community activities and determining responsibilities and rules in this matter.

- ✓ Sabirlar Findik remains neutral to state institutions and organizations, nongovernmental organizations and political parties without expecting any benefit during all of it's activities.
- ✓ Sabırlar Fındık stays away from any relation, effect or event that could affect or create image like that when making neutral, just decisions while working.
- ✓ Sabırlar Fındık is bound to high ethical attitude standards. Maintains all of it's activities in total harmony with national and international laws and regulations.
- ✓ Sabırlar Fındık, doesn't involve in activities such as tax evasion, corruption, offering bribe, deceiving the state on monetary reports etc.
- Employees of Sabirlar Findik, avoids any acts or attitudes that could mean benefiting for himself/herself or relatives.
- Employees of Sabirlar Findik, under no circumstance allow his/her own interest to conflict with corporate's gain and benefiting his/her relatives.
- Employees cannot use confidential or public information about the company in his/her or other's advantage.
- Employees cannot accept a direct or indirect gift related to corporate works, cannot gain benefit and cannot accept loans from person or corporates that are in business relation with the company.
- ✓ Sabırlar Fındık never had it's name on any bribery or corruption incidents from the day it was founded to today.

Company personnel or any third party has to report any violation of hereby policy or current laws regarding preventation of bribery. None of the personnel will recieve any enforcement for their well-intentioned reports about violation doubts. Employees can report any violations of this policy or current related laws to a representitive of corporate board or ethics employee of the company without hesitation.

Sabırlar Fındık 2015 Social Responsibility Work;

We supplied dry food to seasonal hazelnut agriculture workers and their children who are mentioned in this project in Ünye by contributing to social support center that is serving in Ünye under coverage of collaboration of International Labour Organization's (ILO) Turkey office and Ministry of Labour and Social Security (ÇSGB), "Extensive Model Project Towards Ending Child Labour on Seasonal Hazelnut Agriculture in Turkey".

We supplied 160 parcel packages of dry food to Ünye Temporary Settlement Zone where seasonal worker families from mainly Adıyaman, Şanlıurfa and Gaziantep cities reside.

We organized this charity by ourselves. We sent parcel packages containing equally distributed foods that were bought from A101 markets listed below to tent settlement where Ünye seasonal hazelnut workers reside.

Karadem Harman Black Tea 1 kg

Bi Lemonade 1 lt

Anlı Bulgu Pasta 500 gr

Anlı vermicelli 500 gr

Yöremce Red Lentil 1 kg

Yöremce Dermason Bean 1 kg

Önder Rice 2.5 kg

Yöremce Coarse Bulgur 1 kg

Petek Granulated Sugar 2 kg

Yeğenler Wheat Flour 2 kg

Dorbi Chocolate Pudding 150 gr

Namlı Gemlik Type Oily Black Olive 450 gr

Ustasından Instant Yayla Soap 80 gr

Ustasından Instant Chicken Soap with Noodle 80 gr

Bursa Tomato Paste 420 gr

Tuzum Table Salt 750 gr

In accordance with our will, these charity packages were distributed equally to seasonal agriculture workers there with coordination of district governorship, without any incidents of disturbance during distribution.

In this work we have done as social responsibility, our purpose as Sabırlar Fındık was to show our support on ILO's project against child labor and to back up off-budget deficits of this project.

We are pleased to announce that we were shown as an example of institutional social responsibility efforts and private sector support in preparation meeting of National Action Plan to Fight Child Labour (2016-2023) that was done under ÇSGB coordination in between 3-4 December 2015 and our name was mentioned in ILO's general reports about Turkey as a national company contributing to social responsibilities.

As Sabırlar Fındık, we commit that we are aginst child labour and we'll always be supporting projects regarding this.

News link about ILO's project and our contributions; <u>http://www.ilo.org/ankara/news/WCMS_404455/lang--tr/index.htm</u>







Conclusion

In Direction of These Principles, As Sabırlar Fındık;

In any condition, we fulfill the obligations that are necessities of loyalty to laws and ethic rules and we hold ourselves responsible on applying these. Moreover; we make any doubtful matter including violation of laws, regulations, corporate principles, ethic rules clear up.

We take; serving beyond expectations of our customers by investing on technology and employees in any aspect of the production with our experiences, sensitivity towards quality and innovator understanding as our duty.

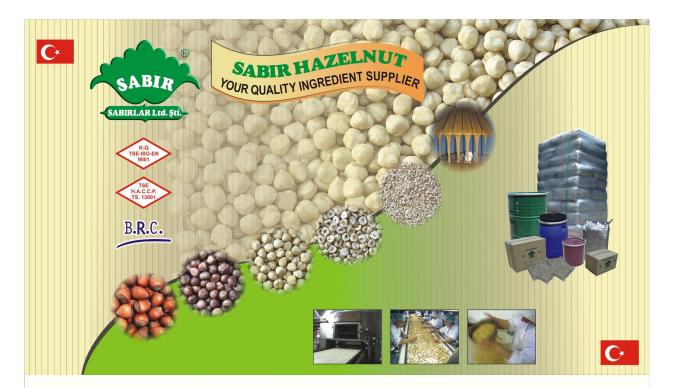
With this duty; We have been continuing our productions for 50 years to become an exemplary brand that is always being looked for by our happy customers, high quality products and experienced staff in hazelnut export sector.

CONTACT

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