Particulars

About You	r Organisation
1.1 Memb	er Name
Yildiz Hole	ding Anonim Sirketi
1.2 Memb	ership Number
4-1104-18	-000-00
1.3 Memb	ership Sector
Consumer	Goods Manufacturers
1.4 Memb	ership Category
Ordinary	
1.5 Count	ry
Turkey	
	our company or organisation produce, process, consume or sell any palm oil or any products containing s of palm oil?
Yes	
Multiple s will be req	select all description(s) that describe the palm oil-related activities of your company or organisation. elections are allowed, and not limited to the primary sector of the member's RSPO membership. You unired to complete the relevant ACOP section based on your selection(s).
_	ent a palm oil Independent Smallholder farmer Group
_	nd operate independent palm oil mills and operate independent palm kernel crushing plants - Processors and/or Traders
—	br broker palm oil, palm kernel oil or related products - Processors and/or Traders
	efiner of palm oil or palm kernel oil - Processors and/or Traders
☐ I am a p	rocessor of intermediate (B2B) palm oil, palm kernel oil or related fractions/derivatives - Processors and/or Traders
☐ I am a E	32B distributor or wholesaler of palm oil, palm kernel oil or related products - Processors and/or Traders
I manuf	
ora part	acture final consumer (B2C) products containing palm oil, palm kernel oil or related products. This includes products manufactured by contractors - Consumer Goods Manufacturers
	acture final consumer (B2C) products containing palm oil, palm kernel oil or related products. This includes products manufactured by contractors - Consumer Goods Manufacturers inal consumer (B2C) products containing palm oil, palm kernel oil or related products - Retailers
☐ I retail f	y contractors - Consumer Goods Manufacturers
☐ I retail f ☐ I operate ☐ I am a c	y contractors - Consumer Goods Manufacturers inal consumer (B2C) products containing palm oil, palm kernel oil or related products - Retailers

Particulars Page 1/1

Processors & Traders

1. Operational Profile

1.1 Please state your company's main activity within the palm oil supply chain.	
Refiner of CPO and PKO	
Palm Kernel Crusher	
☐ Trader with Physical Possession	
☐ Trader without Physical Possession	
☐ Integrated Refiner-Trader-Processor	
✓ Intermediate Products Producer	
Power, Energy and Biofuel Processor	
Animal Feed Producer	
☐ Oleochemicals Producer	
☐ Distribution & Logistics	
Other	
Other	

Processor and/or Trader Page 1/6

2. Palm Oil and Certified Sustainable Palm Oil Consumption

Information in Section 2.0 - Palm Oil and Certified Sustainable Palm Oil Sourcing is a mandatory declaration in your ACOP. This includes volume data on palm oil, palm kernel oil and related products consumed of individual members, sectors and RSPO members as a whole. ACOP reports without reported volume data will be considered as incomplete and will not be accepted. Incomplete ACOP reports may lead to suspension or termination of RSPO membership.

2.1 Please include details of all certified and uncertified operations using palm oil, palm kernel oil and related products, owned and/or managed by the member and/or all entities that belong to the group.

Besler, Marsa
2.1.1 In which markets do you sell goods with palm oil and palm oil-related products?
Europe ,North America ,India,Indonesia,Africa ,Rest of the World
DL.2.0 In order to facilitate ease of reporting and transparency, RSPO members operating within the palm oil demand supply chain can now choose to report palm oil and palm oil product volumes on:
an aggregate level (as in previous ACOP reporting cycles)

Processor and/or Trader Page 2/6

2.2 Volumes of uncertified and certified palm oil, palm kernel oil and related product sourced in the year

Description	Tonnes
Crude palm oil, including derivatives refined from CPO (tonnes)	129255.00
Crude palm kernel oil, including derivatives refined from CPKO (tonnes)	19904.00
Crude palm kernel expeller (tonnes)	0.00
Total	149159.00

2.3 Volume of RSPO-certified palm oil, palm kernel oil and related products sourced in the year (tonnes):

Description	Crude Palm Oil (CSPO) and CSPO Derivatives	Crude Palm Kernel Oil (CSPKO) and CSPKO Derivatives	Palm Kernel Expeller (CSPKE)
RSPO Credits from Mill / Crusher	0.00	0.00	0.00
RSPO Credits from Independent Smallholder	0.00	0.00	0.00
Mass Balance (MB)	0.00	3150.00	0.00
Segregated (SG)	0.00	0.00	0.00
Identity Preserved (IP)	0.00	0.00	0.00
Total	0.00	3150.00	0.00

Processor and/or Trader Page 3/6

2.4 According to the volume information you have provided in Question PT.2.2 and Question PT.2.3, your company's certified palm oil, palm kernel oil and related products uptake is:

2.11%

2.4.1 Please provide additional information on your certified palm oil, palm kernel oil and related products uptake calculated in PT.2.4. This may include changes due to business environment, evolving nature of operations or variations due to stock positions

Certified oil usage has been initiated by the customer's request, in 2021 Besler & Marsa continued to supply certified oil upon request.

2.5 What is the estimated percentage of Certified Sustainable Palm Oil in the palm oil, palm kernel oil and related products sold, traded or processed by your company in the following regions:

Europe	100
North America	0
Malaysia	0
Indonesia	0
China	0
India	0
Latin America	0
Africa	0
Rest of World	0

Processor and/or Trader Page 4/6

3. TimeBound Plan 3.1 Which year did your company achieve (or expects to achieve) the RSPO supply chain certification or RSPO trader/distributor licence? 2019 3.2 Which year did your company start (or expect to start) to source any RSPO-certified palm oil and oil palm products? 2017 3.2.1 If the previous target year has not been met, please explain why. 3.3 Which year did your company achieve (or expects to achieve) 100% RSPO certification of all palm product processing facilities. 2030 3.3.1 If the previous target year has not been met, please explain why. We aim to increase awareness of our customers in Turkey for RSPO certified palm oil and palm kernel. 3.4 Year expected to only source RSPO-certified palm oil and oil palm products. N/A 3.4.1 If target has not been met, please explain why.

3.5 If the TimeBound Plan commitments declared above do not cover all countries in which the member operates, please explain why

Processor and/or Trader Page 5/6

4. Actions For Next Reporting Period

	Please outline activities that your company will take in the coming year to promote the production or isumption of certified sustainable palm oil (CSPO)
	Participation in RSPO Working Group or Task Forces
	Support Independent Smallholders (ISH)
	Contribute to the RSPO Smallholder Trainer Academy
	Financial contribution to the RSPO Smallholder Support Fund
	Direct investments in Smallholder Certification projects
	Involvement/direct investments in Jurisdictional/Landscape approach
	Direct/collective investments in conservation and restoration initiatives
	Financial contribution to support members with Remediation and Compensation (RaCP) process, direct/collective investments in conservation and restoration initiatives
	Allocating FTE to promote the production or consumption of certified sustainable oil palm products
	Specific policies and action plans by the member to promote CSPO production or consumption in the upstream or downstream supply chain, including target dates or broader policies that include such efforts
	No activities planned
\checkmark	Others
Oth	ner er e
	2021 we ensured our traceability to the mill for each shipment. The work on creating an approved supplier list has been

Processor and/or Trader Page 6/6

Consumer Goods Manufacturers

1. Operational Profi

1.1 Please state your company's main activity within the palm oil supply chain.		
Food Good Manufacturer - own brand		
▼ Food Good Manufacturer - third-party brand		
☐ Home & Personal Care Good Manufacturer - own brand		
☐ Home & Personal Care Good Manufacturer - third-party brand		
☐ Ingredient Manufacturers		
☐ Biofuels		
☐ Other		
Other		
-		

2. Palm Oil and Certified Sustainable Palm Oil Consumption

Information in Section 2.0 - Palm Oil and Certified Sustainable Palm Oil Consumption - is a mandatory declaration in your ACOP. This includes volume data on palm oil, palm kernel oil and related products consumed, to enable the RSPO to accurately calculate uptake of individual members, sectors and RSPO members as a whole. ACOP reports without reported volume data will be considered as incomplete and will not be accepted. Incomplete ACOP reports may lead to suspension or termination of RSPO membership.

2.1 Please list down all operations and subsidiaries using palm oil, palm kernel oil and related products that are owned and/or managed by the member, including those under Group Membership

pladis (Ülker Biscuit, Ülker Chocolate, United Biscuits), Godiva
2.1.1 In which markets does your company sell goods with palm oil and oil palm products?
Europe ,North America ,China,India,Malaysia,Indonesia,Africa ,Latin America ,Rest of the World
DL.2.0 In order to facilitate ease of reporting and transparency, RSPO members operating within the palm oil demand supply chain can now choose to report palm oil and palm oil product volumes on:
an aggregate level (as in previous ACOP reporting cycles)

2.2 Total volume of uncertified and certified palm oil, palm kernel oil and related products purchased for use in your company's own-brand and third-party brand products

Description	Tonnes
Total volume of crude palm oil (tonnes)	130917.00
Total volume of crude palm kernel oil (tonnes)	12838.00
Total volume of palm kernel expeller (tonnes)	0.00
Total volume of crude palm oil/palm kernel oil-based derivatives and fractions (tonnes)	2372.53
Total	146127.53

2.2.1 Please estimate the percentage of derivatives and fractions (reported in Question CG.2.2) derived from palm oil or from palm kernel oil. The default split for volumes is assumed to be 80% palm oil-based derivatives and 20% palm kernel oil-based derivatives.

Description	Percentage
Palm oil-based derivatives and fractions	80
Palm kernel oil-based derivatives and fractions	20

2.3 Please estimate the regional distribution of your company's uncertified and certified palm oil, palm kernel oil and related products sales (as declared in Question 2.2) in the following countries/regions.

85
1
0
0
0
0
2
6
6

2.4 Volume of RSPO-certified palm oil, palm kernel oil and related products purchased for use in your company's own-brand and third-party brand products in the year:

Description	Crude/Refined Palm Oil (CSPO)	Palm Kernel	Palm Kernel Expeller (CSPKE)	Certified Derivatives and Fractions
RSPO Credits from Mill / Crusher	1020.00	195.00	0.00	0.00
RSPO Credits from Independent Smallholder	0.00	0.00	0.00	0.00
Mass Balance (MB)	1993.00	3152.00	0.00	0.00
Segregated (SG)	50309.00	280.00	0.00	0.00
Identity Preserved (IP)	0.00	0.00	0.00	0.00
Total	53322.00	3627.00	0.00	0.00

 $2.4.1\ Please\ estimate\ the\ percentage\ of\ RSPO-certified\ derivatives\ and\ fractions\ (reported\ in\ Question\ CG.2.4)$ derived from RSPO-certified palm oil or from RSPO-certified palm kernel oil. The default split for volumes is assumed to be 80% palm oil-based derivatives and 20% palm kernel oil-based

Description	Percentage
Certified Palm oil-based derivatives and fractions	0
Certified Palm kernel oil-based derivatives and fractions	0

2.5 According to the volume information you have provided in Question 2.2 and Question 2.4, your company's certified palm oil and palm oil products uptake is:

38.97%

2.5.1 Please provide additional information on your certified palm oil, palm kernel oil and related products uptake. This may include your usage of RSPO Credits to cover gaps in certified uptake, changes due to business environment, variations due to stock positions or efforts to support independent smallholders beyond volume commitments.

We regularly review our raw materials to ensure that we are using the most appropriate raw materials to deliver the quality required across our range of products. We have been a member of Roundtable On Sustainable Palm Oil since November 2018 in order to provide our consumers with the high-quality products that they expect. We continuously work to improve our footprint and intend to increase the amount of traceable palm oil and that of our supply chain as we strive to leave a happy world to future generations.

Our operations in the UK, The Netherlands, and France have been using 100% oil palm supporting the RSPO sustainability program. In 2018, we initiated a program with the Earthworm Foundation to strengthen our sustainability position. Through this partnership, we have achieved 95% traceability back to the mill in 2021.

2.6 Please estimate the regional sales volume distribution of your company's RSPO certified palm oil, palm kernel oil and related products (as declared in Question 2.4) in the following countries/regions:

Countries/Regions	Percentage
Europe	98
North America	1
Malaysia	0
Indonesia	0
China	0
India	0
Latin America	0
Africa	0
Rest of World	1

3. TimeBound	d Plan
3.1 Which yes	ar did your company achieve (or expects to achieve) the RSPO supply chain certification?
2009	
	ar did your company begin (or expects to begin) using RSPO-certified sustainable palm oil and palm in own-brand products
2009	
3.2.1 If the pr	revious target year has not been met, please explain why.
	ar did your company begin (or expects to begin) using only RSPO-certified sustainable palm oil and lucts from any supply chain option in own-brand products.
2030	
3.3.1 If the pr	revious target year has not been met, please explain why.
UNITED BISOUK, EU and U	CUITS and Godiva achieved 100% palm oil supporting the RSPO sustainability program in our brands in US regions. We still work on for other regions.
	ar did your company begin (or expects to begin) using only RSPO-certified sustainable palm oil and lucts from physical supply chain options (Identity Preserved, Segregated and/or Mass Balance) in roducts.
2030	
3.4.1 If the pr	revious target year has not been met, please explain why.
-	

 ${\bf 3.6.3\ Please\ explain\ why\ your\ company\ does\ not\ have\ such\ a\ TimeBound\ Plan}$

We encourage our partners to comply with the RSPO, however timebound plan depends on other companies.

II aucinui ii ese	4.	Trademark	Use
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4.1 Does your company use or plan to use the RSPO Trademark in own-brand products?
Yes
4.2 Please select the countries where your company uses or intends to use the Trademark
United States
4.2.1 Which year did your company begin (or expects to begin) using the RSPO Trademark
2015

5. Actions for Next Reporting Period

	Please outline activities that your company will take in the coming year to promote the production or assumption of certified sustainable palm oil (CSPO)
	Participation in RSPO Working Group or Task Forces
	Support Independent Smallholders (ISH)
	Contribute to the RSPO Smallholder Trainer Academy
	Financial contribution to the RSPO Smallholder Support Fund
	Direct investments in Smallholder Certification projects
	Involvement/direct investments in Jurisdictional/Landscape approach
	Direct/collective investments in conservation and restoration initiatives
	Financial contribution to support members with Remediation and Compensation (RaCP) process, direct/collective investments in conservation and restoration initiatives
	Allocating FTE to promote the production or consumption of certified sustainable oil palm products
	Specific policies and action plans by the member to promote CSPO production or consumption in the upstream or downstream supply chain, including target dates or broader policies that include such efforts
	No activities planned
\checkmark	Others
Otł	ner
	regularly review our raw materials to ensure that we are using the most appropriate raw materials to deliver the quality uired across our range of products. We have been a member of Roundtable On Sustainable Palm Oil since November

We regularly review our raw materials to ensure that we are using the most appropriate raw materials to deliver the quality required across our range of products. We have been a member of Roundtable On Sustainable Palm Oil since November 2018 in order to provide our consumers with the high-quality products that they expect. We continuously work to improve our footprint, intend to increase the amount of traceable palm oil and that of our supply chain as we strive to leave a happy world to future generations. Our operations in the UK, The Netherlands, France, USA have been using 100% oil palm supporting the RSPO sustainability programme. In 2018, we initiated a program with the Earthworm Foundation to strengthen our sustainability position. Through this partnership, we have so far achieved over 95% traceability back to the mill.

Shared Responsibility

The Board of Governors of the Roundtable on Sustainable Palm Oil approved new Shared Responsibility rules on 31 October 2019, requiring all members to share sustainability requirements and obligations. Reporting of Shared Responsibility (SR) requirements will be done through ACOP and MyRSPO. As the process of verification of the reports is in development, the Shared Responsibility section in ACOP may change in future ACOP cycles. Evidence to show compliance to the SR requirements shall be uploaded via your membership profile in MyRSPO. Please login to your MyRSPO account and upload the relevant policies, plans and relevant reports there. If you do not have a policy or your policy does not cover all items, you will be required to provide a Declaration of Support for the relevant policy items in your MyRSPO profile. Additional information on the required policies and plans applicable to all sectors as well as the annual uptake targets for supply chain actors can be found on https://rspo.org/members/shared-responsibility or email the Shared Responsibility team at sharedresponsibility@rspo.org.

Information & Public Availability 1.1 Does your company have organisational management documents publicly-available? Yes **Ethical Conduct & Human Rights** 1.2 Does your company have a publicly-available Policy covering Ethical Conduct & Human Rights? Yes 1.2.1 Does the policy cover: **M** Recruitment Contractors ✓ Suppliers and Sub-Contractors Legal Compliance 1.3 Does your company comply with all applicable legal requirements? Yes 1.4 Does your company require its third party contractors to comply with legal requirements, i.e. including a clause on legal compliance in the contracts? Yes Complaints & Grievances 1.5 Does your company have a Grievance Mechanism that is accessible to all affected parties? Yes 1.5.1 Is your Grievance mechanism in line with the principles of the RSPO's Complaints System? Yes

Shared Responsibility Page 1/3

Land Use & FPIC

I.6 Does your company have a publicly-available policy covering Commitment to respect Free Prior and Informed Consent (FPIC) in the Palm Oil Supply chain?
Yes
1.6.1 Does your company have a procedure in place to identify legal, customary or user rights, and people entitled to compensation?
Yes
Smallholders
1.7 Does your company support oil palm smallholders (groups)?
Yes
1.7.1 Does your company report on the actions to support the inclusion of smallholders?
Yes
Labour & Labour Rights
1.8 Does your company have a publicly-available policy covering Labour & Labour Rights?
Yes
1.8.1 Does the policy cover:
✓ No discrimination and equal opportunities
Pay and working conditions at least at legal or industry minimum standards and are sufficient to provide decent living wages (DLW)
✓ Freedom of association and Collective bargaining
✓ Protection of children, as well as the workforce of suppliers and third-party contractors
Prevention of all forms of harassment, including sexual harassment
✓ No forced or trafficked labour
Occupational Health & Safety
1.9 Does your company have a publicly-available Policy covering Occupational Health & Safety?
Yes
1.9.1 Does your company have a Standard Operating Procedure (SOP) for Occupational Health & Safety?
Yes

Shared Responsibility Page 2/3

Waste Management

1.10a Does your company have a waste management plan that includes reduction, recycling, reusing and disposal based on the hazardous characteristics?
Yes
1.10a.1 Is this plan implemented?
Yes
Water Management
1.11 Does your company have a water management plan to promote efficient use and continued availability of water sources?
Yes
1.11.1 Is this plan implemented?
Yes
Energy Use
1.12 Does your company have an energy use plan to improve the efficiency of the fossil fuels used and to optimise renewable energy?
Yes
1.12.1 Are there records of implementation of the plan ie. monitoring and reporting?
Yes
Climate Change & Greenhouse Gas (GHG)
1.13 Does your company have a publicly-available policy covering Climate Change & Greenhouse Gas (GHG) including identification and assessment of GHG emissions and implementation of a plan to reduce or minimise them?
Yes

Shared Responsibility Page 3/3

Challenges and Support

1.1 What significant obstacles or challenges has your company encountered in the promotion of certified sustainable palm oil (CSPO)? What efforts has your company taken to address these obstacles or challenges?
Awareness of RSPO in the market
☐ Difficulties in the certification process
☐ Certification of smallholders
✓ Competition with non-RSPO members
High costs in achieving or adhering to certification
☐ Human rights issues
☐ Insufficient demand for RSPO-certified palm oil
Low usage of palm oil
Reputation of palm oil in the market
Reputation of RSPO in the market
✓ Supply issues
✓ Traceability issues
☐ No challenges faced
☐ Others
Others -
1.2 In addition to the actions already reported in this ACOP report, what other ways has your company supported the vision of the RSPO to transform markets to make sustainable palm oil the norm?
☐ Communication and/or engagement to transform the negative perception of palm oil ☐ Engagement with business partners or consumers on the use of CSPO
Engagement with government agencies
 □ Engagement with peers and clients □ Promotion of CSPO through off product claims
Promotion of CSPO outside of RSPO venues such as trade workshops or industry associations
Promotion of physical CSPO
✓ Providing funding or support for CSPO development efforts
Research & Development support
✓ Stakeholder engagement
□ No actions taken
☐ Others
Others
1.3 If your company has any other publicly-available reports or information regarding its palm oil-related policies and activities, please provide the links here

Challenges & Support Page 1/1