

Particulars

About Your Organisation

1.1 Name of your organisation

Yildiz Holding Anonim Sirketi

1.2 What is/are the primary activity(ies) or product(s) of your organisation?

- Palm Oil Grower
- Processor and/or Trader
- Consumer Goods Manufacturer
- Retailer
- Bank and/or Investor
- Social and/or Development NGO
- Environmental and/or Conservation NGO
- Affiliate

1.3 Membership number

4-1104-18-000-00

1.4 Membership category

Consumer Goods Manufacturers

1.5 Membership sector

Ordinary

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
- Food and Non-Food Ingredients Producer
- Power, Energy and Biofuel Processor
- Animal Feed Producer
- Oleochemicals Producer
- Distribution & Logistics
- Other

Other

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2. Palm Oil and Certified Sustainable Palm Oil Consumption

Information in Section 2 - Palm Oil and Certified Sustainable Palm Oil Sourcing is a mandatory declaration in your ACOP. This includes volume data on palm oil and palm oil products consumed, to enable the RSPO to accurately calculate uptake on a member, sector and total level. ACOP reports without reported volume data will be considered incomplete and will not be accepted.

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

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2.1.1 In which countries does your company sell goods with palm oil and palm oil products?

Albania ,Brunei ,Bulgaria ,Cote d'Ivoire ,Croatia ,Cyprus ,Georgia ,Germany ,Greece ,Iraq ,Israel ,Jordan ,Kazakhstan ,Kenya ,Lebanon ,Madagascar ,Mauritania ,Netherlands ,Romania ,Saudi Arabia ,Sweden ,Turkey ,Turkmenistan

2.2 Total volume of all palm oil and palm oil products sourced in the year:

Description	Tonnes
Crude palm oil, including derivatives refined from CPO (tonnes)	137500.0
Crude palm kernel oil, including derivatives refined from CPKO (tonnes)	8100.0
Crude palm kernel expeller (tonnes)	0
Total	145600.0

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

Description	Crude Palm	Crude Palm	Palm Kernel Expeller (CSPKE)
	Oil (CPO) and CSPO Derivatives	Kernel Oil (CSPKO) and CSPKO Derivatives	
RSPO Credits from Mill / Crusher	0	0	0
RSPO Credits from Independent Smallholder	0	0	0
Mass Balance (MB)	4000.0	0.0	0
Segregated (SG)	0.0	0.0	0
Identity Preserved (IP)	0	0	0
Total	4000.0	0.0	0

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 and palm oil products uptake is:

2.75%

2.5 What is the estimated percentage of Certified Sustainable Palm Oil in the palm oil and palm oil products sold by your company in the following regions:

Countries/Regions	Percentage
Europe	100.0
North America	0.0
Malaysia	0.0
Indonesia	0.0
China	0.0
India	0.0
Latin America	0.0
Africa	0.0
Rest of World	0.0

3. TimeBound Plan

3.1 Which year did your company achieve/obtain (or expects to achieve/obtain) 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 for PT.3.2 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 for PT.3.3 has not been met, please explain why.

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3.4 Which year did your company begin (or expects to begin) sourcing only 100% RSPO-certified palm oil and oil palm products.

2030

3.5 If the TimeBound Plan commitments declared above do not cover all countries in which the member sells goods with palm oil or palm oil products, please explain why

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3.6 How does your company proactively promote RSPO and RSPO-certified sustainable palm oil and oil palm products to your customers?

We aim to create value for all our stakeholders and have the ambition to source certified sustainable palm oil progressively and therefore we continue to work closely with our supply base to find the best sustainable solution. Our first refinery became an RSPO member in 2016 and has expanded its sustainable palm oil sourcing policy through 2017-2019. Our second refinery just became a member of the Yildiz Holding Group Membership in 2018. We started sourcing certified palm oil (Mass Balance) in 2017 while emphasizing the importance of sustainable palm sourcing to its stakeholders. We organize meetings and video conferences with our customers to promote them to supply certified palm oil.

4. Actions For Next Reporting Period

4.1 Please outline activities that your company will take in the coming year to promote the production or consumption of certified sustainable palm oil (CSPO)

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 supply chain has the ability to trace all cargoes back to the mill upon request.

5. Shared Responsibility

The Board of Governors of the Roundtable on Sustainable Palm Oil (RSPO) approved new Shared Responsibility rules on 31 October 2019, requiring all members to share sustainability requirements and obligations. Reporting of Shared Responsibility indicators will be done through several channels, including ACOP. As the implementation of Shared Responsibility reporting is still on-going and in development, the Shared Responsibility section in ACOP is not yet final and may change in future ACOP cycles. For more information on Shared Responsibility, please go to <https://rspo.org/news-and-events/news/what-are-the-new-shared-responsibility-rules> or email the ACOP team at acop@rspo.org

Labour & Labour Rights

5.1 Does your company have a publicly-available policy covering Labour & Labour Rights?

Yes

5.1.1 Does the policy cover:

- No discrimination
- Wage and working conditions
- Freedom of association
- No child labour
- No harassment
- No forced or trafficked labour

5.1.2 Has your company previously uploaded or linked its Labour & Labour Rights policy in previous ACOP reporting cycles?

Yes

Ethical Conduct & Human Rights

5.2 Does your company have a publicly-available Policy covering Ethical Conduct & Human Rights?

Yes

5.2.1 Does the policy cover:

- Recruitment
- Contractors
- Sub-Contractors & Third-Party Contractors

5.2.2 Has your company previously uploaded or linked its Ethical Conduct & Human Rights policy in previous ACOP reporting cycles?

Yes

Land Use

5.3 Does your company have a publicly-available Policy covering Land Use?

No

Occupational Health & Safety**5.4 Does your company have a publicly-available Policy covering Occupational Health & Safety?**Yes

5.4.1 Has your company previously uploaded or linked its Occupational Health & Safety policy in previous ACOP reporting cycles?Yes

Climate Change & Greenhouse Gas (GHG)**5.5 Does your company have a publicly-available policy covering Climate Change & Greenhouse Gas (GHG)?**No

Complaints & Grievances**5.6 Does your company have a Complaints & Grievances Mechanism?**No

Smallholders**5.7 Does your company support oil palm independent smallholder groups?**No

5.7.3 Do you have any future plans to support oil palm Independent Smallholders?No

5.7.4 Please explain why you are not planning to support oil palm independent smallholdersWe are not in direct contact with smallholders but are working with our tier-1 suppliers to make them understand the importance of supporting smallholders

6. Challenges

6.1 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

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6.2 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?

- Engagement with business partners or consumers on the use of CSPO
- Engagement with government agencies
- 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

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6.3 If your company has any other publicly-available reports or information regarding its palm oil-related policies and activities, please provide the links here

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Consumer Goods Manufacturers

1. Operational Profile

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

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2. Palm Oil and Certified Sustainable Palm Oil Consumption

Information in Section 2 - Palm Oil and Certified Sustainable Palm Oil Consumption - is a mandatory declaration in your ACOP. This includes volume data on palm oil and palm oil products consumed, to enable the RSPO to accurately calculate uptake on a member, sector and total level. ACOP reports without reported volume data will be considered incomplete and will not be accepted.

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

ULKER BISCUITS ULKER CHOCOLATE UNITED BISCUITS GODIVA

2.1.1 In which markets does your company sell goods with palm oil and oil palm products?

Applies globally

2.2.5 Total volume of all palm oil and palm oil products (palm-content only) used in your company's own-brand products and in products produced by your company for third-party brands in the year:

Description	Tonnes
Total volume of crude/refined palm oil (tonnes)	135151.0
Total volume of crude/refined palm kernel oil (tonnes)	9946.0
Total volume of palm kernel expeller (tonnes)	0.0
Total volume of palm oil/palm kernel oil derivatives and fractions (tonnes)	701.0
Total	145798.0

2.2.6 Please estimate the percentage of derivatives and fractions (reported in Question CG.2.2.4) 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	80.0
Palm kernel oil-based derivatives and fractions	20.0

2.3 Volume of RSPO-certified palm oil and palm oil products used in your company's own brand products and in products produced by your company for third-party brands in the year (tonnes):

Description	Crude/Refined Palm Oil (CSPO)	Crude/Refined Palm Kernel Oil (CSPKO)	Palm Kernel Expeller (CSPKE)	Certified Derivatives and Fractions
RSPO Credits from Mill / Crusher	1538.0	261.0	0.0	0.0
RSPO Credits from Independent Smallholder	0.0	0.0	0.0	0.0
Mass Balance (MB)	1101.0	3874.0	0.0	0.0
Segregated (SG)	53385.0	261.0	0.0	0.0
Identity Preserved (IP)	0.0	0.0	0.0	0.0
Total	56024.0	4396.0	0.0	0.0

2.3.1 Please estimate the percentage of RSPO-certified derivatives and fractions (reported in Question CG.2.3) 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 derivatives.

Description	Percentage
Certified Palm oil-based derivatives and fractions	80.0
Certified Palm kernel oil-based derivatives and fractions	20.0

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

41.44%

2.4.1 If your company has not reached 100% usage of sustainable palm oil through the four supply chain models (RSPO Credits, MB, SG or IP), do you have any plans to cover the gap using RSPO Credits?

No

2.4.2 Please explain why you do not intend to cover the gap using RSPO Credits

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 use 100% RSPO certified palm oil due to customer requirements. In 2018, we initiated a program with the Earthworm Foundation to strengthen our sustainability position. Through this partnership, we have so far achieved 64% traceability back to the mill.

2.5 Please estimate the regional distribution of your company's RSPO certified palm oil and palm oil-products usage (as declared in Question CG.2.3) in the following countries/regions:

Countries/Regions	Percentage
Europe	99.0
North America	1.0
Malaysia	0.0
Indonesia	0.0
China	0.0
India	0.0
Latin America	0.0
Africa	0.0
Rest of World	0.0

3. TimeBound Plan

3.1 Which year did your company achieve (or expects to achieve) the RSPO supply chain certification?

2009

3.2 Which year did your company begin (or expects to begin) using RSPO-certified sustainable palm oil and palm oil products in own-brand products

2009

3.2.1 If the previous target year for CG.3.2 has not been met, please explain why.

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3.3 Which year did your company begin (or expects to begin) using 100% RSPO-certified sustainable palm oil and palm oil products from any supply chain option in own-brand products.

2030

3.3.1 If the previous target year for CG.3.3 has not been met, please explain why.

UNITED BISCUITS achieved 100% certified palm usage in our brands in UK and EU regions. We still work on for other regions.

3.4 Which year did your company begin (or expects to begin) using 100% RSPO-certified sustainable palm oil and palm oil products from physical supply chain options (Identity Preserved, Segregated and/or Mass Balance) in own-brand products.

2030

3.4.1 If the previous target year for CG.3.4 has not been met, please explain why.

UNITED BISCUITS achieved 100% certified palm usage in our brands in UK and EU regions. We still work on for other regions.

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

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3.6 Does your company use RSPO-certified sustainable palm oil and palm oil products in products manufactured on behalf of other companies?

Yes

3.6.1 Does your company have a TimeBound Plan to only use RSPO-certified sustainable palm oil and palm oil products in the goods you manufacture on behalf of other companies?

No

3.6.3 Please explain why your company does not have such a TimeBound Plan

UNITED BISCUITS achieved 100% certified palm usage in our brands in UK and EU regions. We still work on for other regions.

4. Trademark Use

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

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Climate Change & Greenhouse Gas (GHG)**6.5 Does your company have a publicly-available policy covering Climate Change & Greenhouse Gas (GHG)?**

No

Complaints & Grievances**6.6 Does your company have a Complaints & Grievances Mechanism?**

No

Smallholders**6.7 Does your company support oil palm independent smallholder groups?**

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- Engagement with government agencies
- Promotion of CSPO outside of RSPO venues such as trade workshops or industry associations
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