

Antep Foods — Ethical Trading and Modern Slavery Policy

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1. Purpose and scope

This policy sets out how Antep Foods prevents slavery, servitude, forced or compulsory labour, human trafficking and child labour in its own business and in its supply chain, and the ethical standards we apply when we make, buy and export food.

It applies to Antep Foods, to the production site in Başpınar Organised Industrial Zone, Gaziantep, where our core range is made, to the Gaziantep producers who make the lines we source, and to our suppliers of ingredients, packaging, logistics and services.

Antep Foods is a small company. Its turnover is below the threshold that makes a statement under section 54 of the UK Modern Slavery Act 2015 a legal requirement. We publish this policy voluntarily because our customers in the United Kingdom and elsewhere expect it, and because the risks it addresses exist in our sector and our region.

2. Our commitment

We do not tolerate modern slavery, human trafficking, forced, bonded or compulsory labour, or child labour in any form, in our business or among the companies we buy from. We comply with Turkish law, including the Labour Law No. 4857, the Occupational Health and Safety Law No. 6331 and the Social Security and General Health Insurance Law No. 5510, and we expect the same of our suppliers. Where a customer's standard is higher than the law, we work to the higher standard for that customer's orders.

3. Standards for employment

The following standards apply to every worker employed by Antep Foods, at the production site we work with and at our suppliers:

- **Freely chosen employment.** No one works under threat, penalty or debt. Workers may resign with the notice required by law. No deposits are taken.
- **No recruitment fees.** Workers never pay a fee, directly or through an agent, to obtain a job.
- **Identity documents.** Passports, identity cards and residence or work permits are never retained by the employer. Copies may be kept for the personnel file.
- **Child labour.** No one under 15 is employed. Workers aged 15 to 18 are employed only as Turkish law allows and never on night work or hazardous work.
- **Legal registration.** Every worker, whatever their nationality, holds the work permit the law requires and is registered with the Social Security Institution (SGK) from the first working

day. Workers under temporary protection are employed only with a valid work permit and on the same terms as any other worker.

- **Wages.** At least the legal minimum wage, paid in full, on time and to an account in the worker's own name, with a written payslip. No deductions as a disciplinary measure.
- **Working hours.** Within the limits of the Labour Law; overtime is voluntary, recorded and paid at the legal premium; at least one day off in seven.
- **Health and safety.** A safe and hygienic workplace, protective equipment free of charge, and training in the worker's own language.
- **Freedom of association.** Workers may join a trade union and bargain collectively without retaliation.
- **Non-discrimination and respect.** No discrimination on any ground, and no harassment, abuse or intimidation.
- **Written terms.** Every worker receives written terms of employment they can understand.

4. Risks we know about

We assess the risks in our own sector and region honestly and focus our checks on the following:

- **Seasonal agricultural labour.** Hazelnut and pistachio harvests in Türkiye rely on seasonal and migrant workers. Child labour, informal employment and unfair labour-broker practices have been reported in these harvests. These nuts are central to our products.
- **Cocoa.** Child labour and forced labour are documented risks in cocoa growing in West Africa. Our cocoa ingredients come from international supply chains in which these risks exist.
- **Informal employment in the region.** Gaziantep has a large population of migrants and people under temporary protection. Unregistered employment is a known risk in local manufacturing and subcontracting.
- **Labour agencies and subcontractors,** including cleaning, loading and transport services.

5. What we do

- **Supplier commitment.** Every supplier of ingredients, packaging, finished products and services is given this policy and asked to confirm in writing that it meets its standards. We do not place new business with a supplier that will not confirm.
- **Questions before we buy.** Before the first order we ask the supplier about its workforce, use of labour agencies, subcontracting and the origin of its main raw materials.
- **Visits.** We visit the Gaziantep producers we source from, and we can arrange for a customer or its auditor to visit the production site.
- **Nuts and cocoa.** We ask our hazelnut, pistachio and cocoa suppliers to tell us how they address child and forced labour in their own supply chains, including any traceability or certification programmes they take part in. We give preference to suppliers who can show this.
- **No hidden subcontracting.** Suppliers may not subcontract our orders to another site without telling us first.
- **Customer audits.** We cooperate with ethical audits and questionnaires our customers

request, and we share the corrective actions that follow.

- **Training.** Everyone at Antep Foods who buys from suppliers is briefed on this policy and on the warning signs of forced labour and trafficking.

6. If we find a problem

If we find or suspect a breach, we act at once. Our first concern is the safety and interests of the workers affected. We work with the supplier on a time-bound corrective plan. Remediation must not leave workers worse off, for example by dismissing children without arranging education and support. If a supplier refuses to correct a serious breach, we stop buying from it. Where the law requires, we report to the competent authorities.

7. Raising a concern

Anyone — a worker, a supplier, a customer or a member of the public — can report a concern in confidence, in English or Turkish, to **export@antepfoods.com** with the subject line "Ethics", or by telephone on +90 532 013 17 61. We do not tolerate retaliation against anyone who raises a concern in good faith.

8. Wider ethical standards

- **Bribery and corruption.** We do not offer, pay, request or accept bribes or facilitation payments, directly or through third parties, in Türkiye or abroad.
- **Food safety and honest information.** Products are made under the food-safety management systems of the production site. Labels, specifications and offers state the truth: we do not describe compound coatings as chocolate and we do not claim certificates we do not hold.
- **Environment.** We work to reduce waste and energy use, and we comply with environmental law at the production site.
- **Fair dealing and competition.** We compete fairly and keep customer information confidential.
- **Personal data.** We process personal data in line with the Turkish Personal Data Protection Law No. 6698.

9. Responsibility and review

The owner of Antep Foods is responsible for this policy and its application. We review it every year and after any significant incident, and we publish the current version on request to customers and suppliers.

Approved by: Mehmet Özbakır, Owner, Antep Foods

Date: 11 October 2026

Signature: _____