



HUMAN RIGHTS POLICY

1. APPLICATION

Biotrend is committed to operate in accordance with the United Nations Universal Declaration of Human Rights and the Fundamental Conventions of the International Labour Organization, the International Labour Organization Declaration on Fundamental Principles and Rights at Work and the United Nations Global Compact UN Guiding Principles on Business and Human Rights based on these foundations, to respect universal human rights in all regions where it operates and in all its activities, and to protect all rights of its employees by adopting national and international declarations, principles, conventions and principles.

Biotrend develops working methods to implement and support the objectives under the Policy in the light of these basic principles and to prevent direct or indirect human rights violations. Accordingly, in line with the Biotrend Code of Business Ethics, Biotrend adopts the principle to:

1.1 Diversity, Inclusion, Equality:

- Demonstrate equal treatment between employees in the work environment or in processes of recruitment, termination, training, career, promotion, discipline, remuneration, performance evaluation and social rights without discrimination based on religion, language, race, ethnicity, belief, sect, color, nationality or social origin, age, sexual orientation, gender, marital status, political opinion, union membership, disadvantage and any legally protected characteristic,
- Provide employees with a safe working environment free from all forms of harassment, abuse, exploitation, intimidation or physical, verbal, sexual, digital, psychological, domestic or workplace violence due to remote working processes and take all necessary measures and support them with all procedures,

1.2 Working Conditions, Remuneration and Fringe Benefits:

- Work with our subcontractors and business partners in all operating regions in accordance with the working hours and overtime provisions determined by the applicable laws and regulations,
- Implement an equal pay for equal work policy,

1.3 Occupational Health, Safety and Respect for the Environment:

- Provide safe and healthy working environments for employees as well as all business partners and subcontractors in line with the goal of "zero occupational accidents", which is the basis of the understanding of occupational health and safety in all operating regions and workplaces, to take the necessary measures on this matter, develop regulations in accordance with Occupational Health and Safety Legislation and carry out awareness-raising activities through training and other means,
- Ensure that investment projects are analyzed on the basis of their environmental and social impacts in accordance with international legislation, in line with sustainable growth targets and social and environmental legal responsibilities,

1.4 Forced Labor:

- Develop procedures to ensure that its business partners and subcontractors avoid all forms of forced and involuntary labor, including modern slavery, bonded labor, human trafficking and child labor, and work to evaluate the performance of its service providers within the scope of its commitments to international organizations,



1.5 Grievance Mechanism:

- Make contractual regulations and establish reporting/grievance hotline mechanisms to monitor and protect the fulfillment by suppliers of international and national legal requirements on human rights in supply chain practices,

1.6 Freedom of Unionizing:

- Respect employees' freedom of unionizing, freedom of expression and freedom of collective bargaining in accordance with the legislation in all operating regions/countries,
- Not to subject our employees who exercise these rights to pressure or discrimination in any way,

1.7 Working Life Privacy:

- Comply with national and international regulations and practices of data protection authorities to protect the personal data of employees, business partners, subcontractors and stakeholders.

1.8 Expectations for Stakeholders

All business partners, subcontractors and stakeholders, including individuals and institutions acting on behalf of Biotrend, are expected to act in accordance with the Policy. Accordingly, contracts concluded with all business partners and subcontractors include provisions regarding full compliance with the principles set out in this Policy, and the employees of business partners and subcontractors are to adopt and act in accordance with these principles.

Biotrend establishes a reporting/grievance mechanism to ensure compliance with the Policy and regular follow-up of potential violations and questionable situations within the scope of improvements, and strives to evaluate the business processes of the parties from which it receives services in terms of human rights based on its commitments to international organizations.

2. ENFORCEMENT and DISTRIBUTION

This policy has been put into effect with the approval of Biotrend Çevre ve Enerji Yatırımları A.Ş. Board of Directors.

This document is shared and accessible to all employees through the organization's common spaces.

3. SANCTIONS AND POLICY VIOLATIONS

In the event that situations and inappropriate behaviors in violation of this Policy are detected, penal sanctions may be imposed in accordance with the provisions of the relevant legislation of the location in which said event takes place. This also applies to foreign subsidiaries.

Feedback on the Policy and possible Policy violations and violations of the Policy are reported to the e-mail address etik@biotrendenerji.com.tr.

In cases that are or may be in violation of the Policy, the issue is examined by the Biotrend Ethics Committee (and/or Doğanlar Holding Ethics Committee) and necessary sanctions are imposed if inappropriate behavior is detected.

Biotrend attaches great importance to the principles of confidentiality regarding compliance with the Policy and therefore the identity of the persons filing reports will be kept confidential.

Violation of this document will result in action being taken in accordance with **the Disciplinary Procedure**.