

**BİOTREND ÇEVRE VE ENERJİ YATIRIMLARI ANONİM ŞİRKETİ**  
**(“COMPANY”)**

**INFORMATION POLICY**

**1. Purpose**

The main purpose of the information policy is to ensure that the necessary information and disclosures that do not constitute trade secrets are communicated to shareholders, investors, employees, customers and other related parties in a timely, accurate, complete, understandable, easily and accessible manner, under equal conditions. The Company has an active approach in adopting and implementing corporate governance principles, and spends maximum efforts to meet legal requirements for informing the public.

The Company complies with the Capital Markets Law No. 6362 (“CML”), Turkish Commercial Code No. 6102 (“TCC”), capital markets legislation and other applicable legislation and regulations and the regulations of Borsa İstanbul A.Ş. (“BİST”) in relation to providing information. The Company pays utmost care to maintain compliance with Corporate Governance Principles included in the Corporate Governance Communiqué issued by the Capital Markets Board (“CMB”) as amended time to time.

Article 18 (“**Information**”) of the Articles of Association of the Company provides as follows: *“The Company fulfills its obligation to inform the CMB under the capital markets legislation as well as its legal obligation to announce financial statements, reports, and independent audit reports to the public according to the regulations of the CMB.”*

The Information Policy of the Company is developed in compliance with the CMB Material Disclosures Communiqué (II.15.1) and Corporate Governance Communiqué (II-17.1) and announced to all stakeholders on the Company website ([www.biotrendenerji.com.tr](http://www.biotrendenerji.com.tr)).

**2. Powers and Responsibilities**

Information Policy has been developed by the Board of Directors in compliance with the CMB Corporate Governance Communiqué and submitted to the approval of shareholders as a separate item in the agenda of the general assembly meeting of the Company. The Board of Directors is authorized and responsible for monitoring, supervising and developing the Company's policy on public information and disclosures. Amendments to be made to the Information Policy published on the Company website ([www.biotrendenerji.com.tr](http://www.biotrendenerji.com.tr)) after approved by the board of directors. Managers in charge of financial management and reporting and the Investor Relations Department are responsible for the coordination of the information function. The said officials fulfill their responsibilities in close cooperation with the Audit Committee and the Board of Directors. All questions regarding the application principle and procedure of the Information Policy should be directed to the Investor Relations Department.

**3. Methods and Tools Used in Informing the Public**

Tools and methods adopted for informing the public under the capital markets legislation, TCC, and other applicable legislation are listed below:

- Financial statements, independent audit reports and statements entered periodically into the Public Disclosure Platform (“PDP”)
- Annual Reports
- Company website ([www.biotrendenerji.com.tr](http://www.biotrendenerji.com.tr))

- Material disclosure forms
- Announcements made through the Turkish Trade Registry Gazette and daily newspapers
- Communications made with communication devices such as phone, e-mail, fax.

Consolidated financial statements prepared at the end of quarters, in compliance with the legislation issued by the CMB and the footnotes and explanations related to these financial statements, the independent audit report issued six months and at the year ends and the interim board of directors report are submitted to the PDP in due legal periods, and also published on our Company's corporate website at ([www.biotrendenerji.com.tr](http://www.biotrendenerji.com.tr)) The relevant financial statements are submitted to the approval of the board of directors after confirmed by the Audit Committee and signed with a declaration of accuracy by the managers responsible for financial reporting of our company authorized by the Board of Directors. Financial statements disclosed to the public are published on the website of our Company ([www.biotrendenerji.com.tr](http://www.biotrendenerji.com.tr)).

Material disclosures required under the capital market legislation are sent to the Public Disclosure Platform electronically in due time. Material disclosures are, in principle, signed by persons who are responsible for financial reporting and have "qualified electronic certificates" and are presented to the competent authorities. The persons responsible for making material disclosures are determined from among those authorized to represent and bind the Company. In addition, disclosures sent to PDP electronically are published on our Company's Corporate Website ([www.biotrendenerji.com.tr](http://www.biotrendenerji.com.tr)) on the business day after the public disclosure is made, at the latest.

Amendments to the Articles of Association, Invitation to General Assembly Meetings are announced in the Turkey Trade Registry Gazette and when needed, in two daily newspapers circulated throughout Turkey. In addition, they are published in the investor relations corporate governance section of our Company's Corporate Website. The Annual Report, including necessary information and explanations is prepared every year before the General Assembly and presented to the shareholders for examination, and is published on the Corporate Website of our Company ([www.biotrendenerji.com.tr](http://www.biotrendenerji.com.tr)) and the printed form of the report is also available at the Investor Relations Department of our Company. In addition to the explanations disclosed under the Annual Report, the Company will make disclosures on its Corporate Governance Compliance Report in the form, content and venues required by the applicable legislation, including the Corporate Governance Communiqué and the CMB's Corporate Governance Reporting Guidelines, as amended from time to time.

Press and media can be used, press conferences can be held and/or press releases can be published and other means of communication can be used to make public disclosure of material matters, including forward-looking evaluations. When necessary, press releases are made through written and visual media. Press releases to written and visual media are made by authorized employees. Before or at the same time before announcing a material disclosure, a disclosure is made on the PDP, and such disclosure is also made on the Company's corporate website.

Information requests submitted to the Company by shareholders, investors and analysts are answered by the Investor Relations Department in an accurate, complete and equitable manner, through written, oral or information meetings, in line with the information disclosed to the public. Shareholders and other relevant parties are informed through information meetings held. Managers in charge of financial management and reporting and the officers in the Investor Relations Department participate in such meetings held by the Investor Relations Department. Presentations and reports used in

these events can be published on our Company's Corporate Website ([www.biotrendenerji.com.tr](http://www.biotrendenerji.com.tr)).

When requested, relevant information, particularly financial statements, is communicated by the investor relations department to the shareholders and organizations that issue research reports on our Company via e-mail.

### **3. Investor Relations Department**

The Company fulfills its obligations arising from the TCC and the capital markets legislation under supervision of the Investor Relations Department and in compliance with CMB Corporate Governance Principles.

In addition to the bodies of the Company, the “Investor Relations Department”, which must be established as required by legislation, plays an active role in protecting and facilitating the exercise of shareholders' rights, in particular the right to obtain and review information.

Information and data regarding our Company are given in the corporate governance profile under Investor Relations section on the Corporate Website of our Company ([www.biotrendenerji.com](http://www.biotrendenerji.com)). Our Company's Corporate Website ([www.biotrendenerji.com](http://www.biotrendenerji.com)) is followed and kept up-to-date by the Investor Relations Department. All questions directed by shareholders and other related parties via e-mail, letter, telephone, etc. are answered by the Investor Relations Department as soon as possible. In this context, the main activities carried out under the responsibility of the Investor Relations Department are summarized below.

- a) Meeting the verbal and written information requests of shareholders about the Company, except for the information that is not disclosed to the public, is confidential and constitutes trade secrets.
- b) Holding general assembly meetings in accordance with the current legislation, Articles of Association and other Company regulations.
- c) Preparing information documents to be presented to shareholders at general assembly meetings,
- d) Ensuring that all kinds of issues related to public disclosure, including the applicable legislation and Company Information Policy, are observed and monitored.
- e) Keeping accurate, reliable and up-to-date records of investors,
- f) Informing the analysts who make evaluations about the company.
- g) Timely presenting the information and disclosures that may affect the exercise of shareholding rights, to the attention of shareholders on the Corporate Website of the Company.
- h) Informing the public by sending necessary material disclosures to CRA through PDP taking into account the Material Disclosures Communiqué of the CMB which may be amended time to time
- k) Following up the changes in the legislation related to the CML, and bringing them to the attention of the relevant units of the Company.

## **5. Measures Taken to Maintain Confidentiality of Information on a Material Event until a Material Disclosure is made**

In order to ensure confidentiality of material events until a material disclosure is made, the Company employees that have access to insider information are informed on their obligations arising from the applicable legislation and which information could be disclosed to the public by whom and under which conditions. Agreements made with individuals and organizations providing service to the Company, and therefore have access to insider information also include a confidentiality clause.

Furthermore, in order to prevent any unauthorized disclosure related to operating results, at certain times in a calendar year, information is not shared with capital market participants related to operating results that are not disclosed to the public and other issues. This period is considered as the “Quiet Period”. During the Quiet Period, the Company representatives do not make any statement about the financial status of the Company, excluding information already disclosed to the public. Questions of capital market participants such as analysts and investors about the financial status are not answered.

During the Quiet Period, individuals authorized to make disclosures on the Company are not restricted from attending to and making speeches in conferences, panels and similar events, making interviews with printed and visual media provided that they maintain the confidentiality of insider information and comply with the rules of the authorized representatives of the Investor Relations Department related to confidentiality of insider information. Quiet Period starts on the fifteenth day of the month following the month in which quarterly interim and annual financial periods end, and continues until the financial statements are disclosed to the public.

The Company may postpone disclosure of insider information to the public to avoid damaging its legitimate interests, provided that this will not mislead the investors and it will be able to maintain confidentiality of such information. In such cases, the Company takes all kinds of measures to ensure confidentiality of insider information under the capital markets legislation. As soon as the reasons for postponement of insider information to the public are eliminated, a public disclosure is made in compliance with the legislation. In such disclosure, the decision to postpone and the reasons for such postponement are explained.

In the event it is determined that insider information has been disclosed to third parties, and it is concluded that confidentiality of such information cannot be maintained under regulations of the Capital Markets, then a material disclosure will immediately be made.

## **6. News and Rumors Covered by Media**

News and rumors on the Company broadcasted in the media or on websites are followed and monitored by a professional media-monitoring agency. In the event it becomes necessary to make a disclosure under that applicable legislation related to material disclosure events, information is collected from relevant departments, and a disclosure is made.

In case of news or rumors are broadcasted in the media or discussed in the public that may affect the investment decisions of the investors, or the value of capital market instruments, and are not sourced from individuals authorized to represent the Company and are different from information that were previously announced to the public through material disclosures, prospectus, circular, announcements approved by the CMB,

financial reports, and other instruments used to inform the public; the Company will make a statement as to whether such information is accurate and sufficient. However, the Company will not make a statement on the comments, analyses, and evaluations or estimated made related to the Company.

## **7. Criteria Used for Identifying Persons With Managerial Responsibilities**

Under the capital market legislation, “Persons with Administrative Responsibility” refers to 1) members of board of directors of the Company; and 2) persons who, though not a director, have direct or indirect regular access to insider information of the Company, and are authorized to take managerial decisions which impact the Company’s future development and commercial targets.

When identifying persons with managerial responsibilities, duties of these persons in the Company and the content of the information accessed by them are taken into account. Accordingly, Board Members, General Manager, Assistant General Manager, managers of the Finance and Financial Affairs are identified as persons with managerial responsibilities and have regular access to insider information.

Accordingly, managers and employees that do not have information that may affect the value of the capital market instrument and investment decisions of the investors, in other words that have information on only a part of the Company and have restricted information on the whole Company are not considered as a person who has managerial responsibilities and access to insider information.

## **8. Principles related to forward-looking statements**

Evaluations that include forward-looking plans and projections or give opinion on the future activities and financial standing and performance of the Company that constitute insider information may be disclosed to the public in compliance with the requirements of the capital market legislation. In the event forward-looking statements are disclosed to the public, relevant assumptions and historical facts that those assumptions are based on are also disclosed. In the event it is later understood that the forward-looking statements will not occur to a material extent, such statements will be revised.

Forward-looking statements are based on reasonable assumptions and projections. In case of any deviation due to unforeseeable risks and developments, which lead the actual results to materially differ from those previously disclosed to the public, such differences are announced to the public together with their reasons.

Chairman of the Board of Directors and the General Manager are authorized to disclose forward-looking statements of the Company.

Forward-looking statements may be disclosed through material disclosures, media outlets, press meetings, press releases, national and international conferences or meetings or other communication channels, in compliance with the requirements of the capital markets legislation.

## **9. Corporate Website ([www.biotrendenerji.com.tr](http://www.biotrendenerji.com.tr))**

The Company uses the Corporate Website actively as stipulated in the CMB Corporate Governance Principles in order to be in continuous communication with shareholders and to have efficient and effective relations with them.

The information on this website are updated continuously under the responsibility of the investors relations department. The information included in the Corporate Website are the same with disclosures made in compliance with the applicable legislation, and do not have any conflicting or incomplete information.

In addition to information that has to be disclosed according to the applicable legislation, the Corporate Website of the Company includes trade registry details, current structure of shareholding and management, final version of the articles of association of the Company, material disclosures, financial statements, annual reports, agenda of General Assembly meetings, lists of attendees and minutes of meetings, proxy voting forms, profit distribution policy, remuneration policy, policy on donations and aids and information policy. Accordingly, the Corporate Website of the Company will contain information for minimum for the last five years.