

PUBLIC RELATIONS POLICY

1. PURPOSE

This policy aims to determine the framework of the Public Relations activities of Biotrend Çevre ve Enerji Yatırımları A.Ş. (the "Company") in a manner to produce the highest value for all stakeholders and the society in line with the provisions of the applicable legislation, the Company's Corporate Governance Principles, the principles set forth in the Code of Business Ethics, Anti-Bribery and Anti-Corruption Policy and Donations and Sponsorship Policy, as well as the key principles provided by the United Nations Global Compact, to which Biotrend is also a signatory.

The Company aims to contribute to the constant improvement of policy-making, decision-making and regulation amendment processes of the Public Institutions with which it is in contact due to the permission/authorization processes related to its investments, and conduct its Public Relations professionally in full compliance with high ethical standards and the principles of transparency, responsibility and accountability.

2. SCOPE

This Policy applies to both domestic and foreign operations of Biotrend and its Affiliates, and all Company employees including the Members of the Board of Directors of the Company, as well as the managers and employees of Business Partners conducting official processes before Public Institutions on behalf of the Company due to goods and service procurement by the Company.

3. DEFINITIONS

"**Public**" shall refer to all public and governmental bodies including local/regional/national organizations and legislative/regulatory/judicial bodies. This definition also applies to locations abroad where activities are carried out.

"**Public Institution**" shall refer to all governmental institutions established by means of a law or an administrative act performed on the basis of express authority granted under a law, which will be responsible for the management and operation of the Republic of Turkey and local governments in locations abroad where activities are carried out.

"**Public Official**" shall refer to the public officers who take part in the performance of activities of public institutions either as a result of an election or appointment in person or by deputy appointment within the scope of the applicable legislation.

"**Public Relations**" shall refer to close follow-up of all authorization and license processes of the Company conducted before the national and local public institutions to ensure that they are positively concluded as soon as possible; conduct of lobbying activities in a manner to support the Company's investments and sector's development in relation to the primary/secondary legislation amendments to be made by public institutions by means of anticipating regulatory risks; ensuring efficient representation of the Company before the sectoral organizations to which it is a member and having an impact on the public policy-making processes via such organizations and the management of relations with local stakeholders in each location where the Company has investments.

"**Public Relations Department**" shall refer to the unit created particularly for obtaining official authorizations and maintaining relationship with governmental institutions as part of the Public Relations of all affiliates controlled by Biotrend including the Company.

“Investments and Incentive Applications Department” shall refer to the unit created for management and maintenance of the relationship with the Public and Administrations in order to ensure the efficiency of the interactions of Doğanlar Holding Group Companies with the Government, as well as the agreements they sign with the Government.

“Board of Directors of the Company” shall refer to the Board of Directors of Biotrend Çevre ve Enerji Yatırımları A.Ş.

“Board of Directors of the Holding” shall refer to the Board of Directors of Doğanlar Holding.

4. ROLES AND RESPONSIBILITIES

Members of the Board of the Holding and the Company shall create the necessary environment for ensuring that the Company's relationship with the Public Institutions and local stakeholders is maintained in line with the Application Principles set forth in Article 5 hereof and ensuring sound operation of the Ethical Committee and/or Disciplinary Committee in case of violation of this Policy.

Company managers shall decide, as regards each work item to be carried out before Public Institutions, on which employees will conduct Public Relations processes in coordination with Public Relations Department and/or Investments and Incentive Applications Department, inform Business Partners on important official processes they need to conduct before Public Institutions on behalf of the Company, and coordinate the involvement of Company employees and/or Public Relations Department and/or Investments and Incentive Applications Department in the relevant process when necessary.

Company employees shall be responsible for obtaining all kinds of information and documents related to the contact of the Public Relations Department with Public Institutions as part of the Public Relations processes for which they are assigned by their managers and accompanying the Public Relations Department in official visits and meetings when deemed necessary.

Business Partner managers and employees shall be obliged to inform the relevant Company manager before all official processes they need to conduct on behalf of the Company with the Public Institutions and ensure maximum support with respect to the actions to be taken by the Company employees and/or Public Relations Department during the subsequent phases of the process.

Public Relations Department shall be responsible for determining priorities taking into consideration the potential impact of the Public Relations work items escalated by Company managers on the affiliates' balance sheet and the potential regulatory risks they may cause if concluded negatively and designing the Public Relations Strategy and implementing such strategy in close cooperation with the employees of the relevant Company employees before Public Institutions.

“Investments and Incentive Applications Department” shall be responsible for management and maintenance of the relationship with the Public and Administrations in order to ensure the efficiency of the interaction of Doğanlar Holding Group Companies with the Public Institutions and Institutions, as well as the agreements they sign with the same.

All Managers and Employees: shall be obliged to notify the Chair of the Board and CEO before top-level Public meetings such as those held with Ministers, Deputy Ministers, General Directors, Provincial Governors, Mayors, etc., and write a summary memorandum following the meetings.

5. IMPLEMENTATION PRINCIPLES

The key principles to be considered with utmost sensitivity in relation to the implementation of the Company's Public Relations Policy are as follows:

- Ensuring strict compliance of all legal authorizations and documents and new applications with the provisions of all primary/secondary legislation and making these documents and authorizations compliant with the provisions of the changing legislation in subsequent stages,
- By regularly revising the existing and potential regulatory risks, making and implementing necessary action plans to be implemented before the Public Institutions in order to eliminate or minimize these risks,
- Providing constructive opinion and suggestions to support the Company's investments and sector's development within the scope of the policy-making, decision-making and legislation amendment processes of Public Institutions,
- Ensuring the transparency and integrity of lobbying applications (Lobbying activities shall be assessed by the Corporate Governance Committee at the Board of Directors level),
- Complying with the principles of transparency, responsibility and accountability and high ethical standards in addition to fundamental moral and humanitarian values at all stages of the Public Relations,
- Exercise by the Company and its employees of sensitivity towards information security during the meetings to be held with Public Institutions,
- Submitting all information to the relevant Public Institutions in a transparent and honest manner, not providing deficient or incorrect information in any manner whatsoever even when it would serve the interests of the Company, and reporting all probable benefits and risks to be brought along by the suggestions made in an objective manner,
- Maintaining long-term professional relationship with Public Institutions at all levels on the basis of trust,
- Ensuring mobilization of the sectoral organizations to which the Company is a member in a manner to ensure that the Company makes the most efficient contribution to the Public Relations activities, and encouraging everyone at these sectoral organizations to act together with the other market players in line with fair competition conditions,
- While avoiding criticism that may harm the Company's reputation before Public Institutions on one hand, sharing all kinds of opinion, suggestions and criticism of Public Institutions related to the Company with the relevant Company Manager on the other, encouraging the necessary steps to be taken for the correction of Company practices determined to have negative impact before Public Institutions, and informing the Public Institutions regularly as regards the developments during such process,
- Ensuring the conduct of Public Relations processes in strict compliance with the principles determined in the Company's Anti-Bribery and Anti-Corruption Policy and the applicable national legislation,
- Not making a positive/negative comment about the other companies in any manner whatsoever during meetings with Public Institutions,
- In relation to meetings with Public Institutions, determining the clear boundaries of the actions that may be binding on the Company with respect to Public Institutions and the applicable legislation such as exchange of information/opinion on behalf of the Company, or representation of the Company or making any commitment on behalf of the Company by means of negotiations with the

relevant Members of the Board of Directors, Company managers, Investments and Incentive Applications Department and the Public Affairs Department before the meeting to be held,

- Acting in full compliance with the Anti-Bribery and Anti-Corruption Policy, and not even offering any bribes, corruption, facilitation payment, donation, charitable contribution or any abuses to any Public Institution,
- Not stating opinion related to current political developments during the meetings with the Public Institutions, and not disclosing personal political opinion, and
- Ensuring that the presentation of gifts to Public Institutions and the entertainment is in line with the rules set forth in the Company's Anti-Bribery and Anti-Corruption policy.

6. NOTIFICATION OF POLICY VIOLATIONS

In each case of any actual or suspected action in violation of all principles and rules including, without limitation, the provisions of the applicable legislation, the rules set forth in the procedures listed under Article 1 hereof and the principles listed in Article 5 hereof, an application shall be filed with the Ethical Committee by sending an e-mail to etik@biotrendenerji.com.tr.

7. RELATED DOCUMENTS

Anti-Bribery and Anti-Corruption Policy

Working Principles of Corporate Governance Committee

Working Principles of Ethical Committee

Code of Business Ethics

8. EFFECTIVE DATE AND REVISION

This Policy shall- take effect upon approval by the Board of Directors of Biotrend.

It shall be revised by the managers of the Public Relations, Investments and Incentive Applications, and Legal and Audit departments under the coordination of Compliance Department when necessary or at least once every two years, and be negotiated by Biotrend Corporate Governance Committee, and updated, as necessary.