

# ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

## 1. IMPLEMENTATION

### 1.1. Companies from which Goods and Services Are Procured and to which Goods and Services Are Sold and Business Partners

It is mandatory for the companies from which goods and services are procured and to which goods and services are sold and business partners to ensure compliance with the policy principles and other legal regulations, and activities carried out with persons and institutions failing to comply with the same shall be ended.

#### Selection of Companies and Business Partners

While selecting the companies from which goods and services are procured and to which goods and services are sold and business partners, the senior management takes into consideration experience, financial performance and technical competence, as well as ethical levels and a positive track record in the relevant field. No business deals may be made with companies and business partners which have a negative track record related to bribes or corruption. In this respect, the responsibility for performing the necessary inquiry and assessments before engaging in a business relationship belongs to the senior management first.

During its audits, the Auditing Department shall make an assessment on whether the relevant principles are complied with.

#### Executing Agreements with Companies and Business Partners

The agreements and contracts to be signed with companies and business partners with an eligible record and meeting other criteria should include provisions related to:

- ensuring strict compliance with the principles set forth in the policy and the other applicable regulations,
- adoption by the employees of such principles and their compliance therewith,
- ensuring that employees are provided with trainings on the Policy at regular intervals,
- reminding employees regularly of their reporting obligations and the Ethics Line and encouraging them to make reports when they face such cases,

compliance with the relevant conditions and termination of the business activities and the applicable agreements for good cause in case of failure to comply with the same or any violation of the policy.

### 1.2. Our Relevant Policies and Procedures

#### Bribery and Corruption

Biotrend is against all kinds of bribery and corruption. Giving or accepting bribes for any purpose whatsoever is strictly prohibited.

The business relationship with third parties who wish to do business with Biotrend through bribes or corruption should be ceased.

#### Gift

All kinds of gifts offered or granted by Biotrend to third parties should be offered expressly, in good faith and unconditionally. Principles related to gifts that may be granted in this connection and their entrance

into the records have been set forth in the Policy on the Granting and Acceptance of Gifts included in Biotrend Code of Business Ethics.

The same principles shall apply to acceptance of gifts, and gifts other than those of nominal value, which are not of a valuable consideration, set forth in these principles are strictly prohibited. In addition, acceptance of gifts, even if they meet such criteria, should not be frequent, and the gifts accepted should be reported by the line manager of the person of the gift recipient to the company's Compliance Director and senior management.

### **Facilitation Payments**

No facilitation payments can be offered to the people and institutions covered by the scope of this policy for guaranteeing or accelerating any routine work or process (e.g., obtaining license or authorization, obtaining documents, etc.) carried out with state agencies.

### **Donations**

There are certain legal restrictions imposed in relation to donations and charitable contributions under the Capital Markets Law and the applicable legislation that apply to Biotrend. Accordingly, the Donation and Charitable Contribution Policy that has been prepared has been announced on the website and has been approved by the General Assembly.

Support given by Biotrend employees to charitable organizations with funds they collect independently from their jobs is out of scope of Biotrend Donation and Charitable Contribution Policy. However, the principles set forth in Biotrend Code of Business Ethics shall apply also in this regard.

### **1.3. Accurate Record Keeping**

Rules applicable to Biotrend with respect to accounting and recording system are governed by legal regulations. Accordingly,

- all kinds of accounts, invoices and documents related to relationships with third parties (e.g., customers, suppliers, etc.) should be completely, accurately, and reliably entered into records and retained; and
- no falsification should be made in the accounting or similar commercial records related to any transaction, and concrete facts should not be distorted.

### **1.4. Training and Communications**

Anti-Bribery and Anti-Corruption Policy has been announced to Biotrend employees and is easily and constantly accessible online/via portal.

Trainings are a valuable tool for raising awareness among employees. In this regard, Human Resources Department shall design training programs that are mandatory for all employees in cooperation with Compliance Department.

### **1.5. Reporting Policy Violations**

If it is believed or suspected that an employee or a person acting on behalf of Biotrend is violating this policy, this should be reported to Biotrend Ethical Committee. Biotrend employees are regularly reminded of issues related to Biotrend Code of Business Ethics.

Biotrend encourages an honest and transparent approach and supports all its employees or people acting on behalf of Biotrend who raise their concern in good faith and sincerely and keeps such reports confidential.