



GIFT AND HOSPITALITY POLICY

1. GENERAL PRINCIPLES

The company and its employees must refrain from accepting gifts or benefits that could compromise their impartiality, decisions, and behavior. Similarly, they must not attempt to provide gifts, hospitality, or benefits to third parties that could create such influences.

The application principles described below regulate the gift exchanges and hospitality conditions that company employees may have with third parties that they have business relationships, as well as the relationships with Politically Exposed Persons (PEP). The application principles also specifies the principles to be applied in this regard.

1.1. Gifts

It is prohibited for company employees to accept any form of benefit or gift, whether with or without economic value, that could or may appear to influence their impartiality, performance, or decision-making while carrying out their duties.

- Company employees may accept gifts provided that below conditions are satisfied and/or may accept to be reviewed under special conditions;
 - gifts in alignment with the organization's business objectives
 - gifts that are compliant with the relevant legal regulations and
 - gifts of which receiving them will not put the company in a difficult situation if the gift becomes publicly known.
- Subject to complying with the conditions stated in the above clause
 - Company employees may both offer and accept entertainment, refreshments, and meals within acceptable business standards.
 - Symbolic gifts such as commemorative awards, plaques, etc. with no significant monetary value may be accepted on behalf of the company at seminars and similar events attended for representation the company.
 - Promotional, logo-branded items may be accepted/given as gifts for promotional purposes.
- The acceptance of gifts or benefits, whether explicitly or implicitly linked to an exchange, is prohibited.
- Accepting, giving, or offering bribes and/or commissions is strictly unacceptable under any circumstances.
- It is prohibited for company employees to accept money without consideration or in the form of loans from subcontractors, suppliers, consultants, competitors, or customers, as well as covering activity expenses and similar payments.
- The types of gifts and promotional materials to be provided to customers and other third parties engaged in business relationships with the company are approved by the CEO.
- In alignment with the conditions listed above, the company may accept appropriate products and services as gifts. With the knowledge and approval of the CEO, in compliance with the recipient's culture and ethical values, only gifts that are valued up to US\$100 can be given or accepted. Any gifts that are valued higher than US\$100 should be approved by the Chairman of the Board of Directors.
- In cases where the refusal of a gift could potentially harm business relationships or be contrary to cultural norms and traditions, relevant senior management, the Compliance Director, and Human Resources should be informed.

1.2. Hospitality

Business dinners and events are common practices in the business world. Biotrend and its subsidiaries, along with suppliers and business partners, may cover each other's meal, travel, and accommodation expenses while working effectively on a project or conducting any operational activity. However, compliance with the following criteria is necessary to avoid any situation that contradicts the law, this policy, and other relevant Biotrend and its subsidiaries policies.

- There must be a legitimate business interest related to an ongoing or potential business relationship with the counterpart.
- The event must be one-time and not regularly repeated.
- The event should not be excessive or disproportionate (such as the value or nature of the event being disproportionate to the business relationship), and it should not take place in inappropriate venues.
- Entertainment activities should not adversely affect fair and impartial decision-making or cause negative perceptions among others.

Participation in meals and other hospitality activities in accordance with the criteria mentioned above may be considered appropriate.

Documentation related to hospitality activities should include all relevant details explaining the participating parties and the relevant business relationship (business purpose), as well as descriptions and supporting documents related to the event. Relevant expenses should be accurately and transparently recorded in books and records under appropriate expense accounts related to the business relationship.

Employees participating in hospitality activities should submit supporting documents to the Accounting Department for safekeeping.

1.3. Policy on Attendance to Invitations

When participating in various events and invitations from customers, business partners, suppliers, banks, legal and customs consultants, etc., with whom there is a business relationship, the following conditions are observed:

- Supplier-hosted events for product launches/introductions, provided that the product is new and the invited individual directly influences purchasing decisions,
- The invitation should only cover transportation and accommodation,
- When invited as a speaker to a conference, all expenses should be covered by the inviting party; in cases where this is not adhered to, CEO approval must be obtained.
- If invited with their spouses to Business Partners' events, they may attend only if their own expenses are covered by the inviting party, with the condition that the expenses for spouse/family are covered by the employee themselves.

1.4. Relationships with Public Officials/Politically Exposed Persons (PEP)

Communication with public officials and politically exposed persons is subject to strict regulations. Both local and international regulations prohibit giving valuable items to public officials or politically exposed persons in order to facilitate a business transaction.



Giving gifts to public officials or politically exposed persons can raise suspicions of bribery or corruption. In this direction, such gifts or hospitality and other entertainment activities should be conducted reasonably and in compliance with relevant regulations, in order to avoid being perceived as bribery or undue advantage.

2. SANCTIONS AND POLICY VIOLATIONS

Feedback on the policy and potential policy violations and non-compliances shall be reported to etik@biotrendenerji.com.tr e-mail address.

In case of non-compliance with this document, the procedures outlined in **Discipline Procedure** will be followed.