



COMPLIANCE POLICY

Biotrend and its Subsidiaries operate with integrity and accuracy, in compliance with existing legal and regulatory provisions, international standards, business ethics rules, internal policies, regulations and other obligations in all its areas of operation. It is imperative that all employees are conscious of Compliance matters, which can have a significant impact on the integrity and reputation of the Company's business operations.

Biotrend's approach to compliance management concerns with ensuring uncompromising compliance with local legislation, Biotrend Code of Business Ethics, Biotrend policies and procedures, instructions and rules, legislation on the prevention of bribery and corruption, capital market law, competition law, electricity market law, personal data protection law, information security rules, relations with third parties and the provisions of international agreements as applicable in terms of their relevance.

With this Policy, Biotrend commits to fulfill the requirements of the policies included in Compliance Management and to continuously improve its Compliance Management approach. Accordingly, the Policy is regularly supervised by the Compliance Function to ensure that these commitments are met.

Biotrend's approach to Compliance Management is implemented in line with the principle of continuous improvement, subject to the oversight of the Board of Directors and the Executive Committee and the audit of the Internal Audit Department.

Biotrend Board of Directors has established a Compliance Department within Biotrend, which is independent from the Executive Board. The Compliance Department is responsible for the effective execution of compliance management throughout Biotrend by drafting and updating the compliance policy and all relevant policies, conducting compliance trainings, providing guidance to employees, anticipating and preventing compliance risks, creating and maintaining compliance awareness and regularly reporting compliance management performance.

The Compliance Department is chaired by the Chief Compliance Officer who reports directly to the Board of Directors.

Thus, the Board of Directors is regularly informed by the Chief Compliance Officer about the Compliance Management performance and, if deemed necessary, about compliance risks or findings and measures without delay.

The Compliance Department conducts regular Compliance Risk Assessments to determine potential compliance threats to the significant activities of Biotrend and its Subsidiaries and the level of risk to which Biotrend is exposed. Under the supervision and oversight of the Board of Directors and the Executive Board, risks are regularly identified and assessed, and it is ensured that the necessary measures are taken in a timely and complete manner to prevent potential violations and compliance risks. In this way, the Company manages/eliminates compliance risks and is protected to the extent possible from high-amount fines, administrative fines and criminal sanctions, and behaviors that are jeopardizing to the Company's reputation.

Ensuring that Compliance Management achieves its intended outputs and maintaining the effectiveness and continuity of the system is the responsibility of all business units within Biotrend. All Biotrend employees are responsible for reporting a potential or actual compliance violation.

All notifications are ensured to have the highest level of confidentiality. Pursuant to Biotrend's Anti-Retaliation Policy, in the event of reporting any matter that is deemed to be in violation of Biotrend's



Code of Business Conduct and all other Biotrend company policies, no retaliation (including but not limited to discrimination, suspension, loss of rights, demotion, prevention of promotion, threats or harassment) may be taken against any employee who, in good faith and honesty, reports a violation and/or suspected violation and/or requests information regarding Biotrend's Code of Business Conduct.