



WHISTLEBLOWING PROCEDURE

PURPOSE

Biotrend Environment and Energy Investments Inc. ("Biotrend") has published this Whistleblowing Procedure ("Procedure") in order to support its commitment to carry out its activities in accordance with ethical rules at all times.

This Procedure being a component part of Biotrend Code of Business Ethics, is intended to set out the principles of whistleblowing, to establish the whistleblowing process within Biotrend, to clarify how to raise concerns and what kind of concerns can be raised, and to provide guidance on the protection of ethical whistleblowers.

Biotrend recognizes the leading role that ethical whistleblowers play in identifying unethical behavior and specifically encourages a "culture of speaking out" within the company.

SCOPE

This procedure applies to Biotrend and all of its affiliates and covers all present and former employees, including existing companies to which Biotrend supplies goods and services, and their employees, suppliers, subcontractors, contractors, consultants, and parties with a business relationship with Biotrend.

DEFINITION AND ABBREVIATIONS

Whistleblowing is an act of disclosure and reporting concerns and behaviors that are considered to be potentially or directly in conflict with ethical values, internal procedures, legal and/or regulatory obligations within and in relation to the organization.

Whistleblower is an individual reporting activities that are harmful to company culture, values and eventually to the public interest and who is under protection.

RESPONSIBLES

The Risk and Compliance Director is responsible for the preparation of this document, the Ethics Committee under the coordination of the Risk and Compliance Director for reviewing and keeping it up-to-date, the Board of Directors through the Corporate Governance Committee for its approval, and the Ethics Committee for its implementation. However, all company managers are responsible for managing the business processes in the administrative and commercial functions they are responsible for in accordance with the procedure.

VALID WHISTLEBLOWING REASONS

This Procedure gives you the opportunity to speak freely about (possible) unethical behavior, to raise concerns, and to question/discuss all issues related to such concerns. In general, it is possible to report on various issues related to corruption, fraud or illegal activities.

A list of whistleblowing reasons includes, but is not limited to:

- Corruption, accepting or giving bribes,
- Money laundering, theft, fraud,
- Anti-competitive behavior,
- Lack of diversity, discrimination, harassment, mobbing
- Child labor, forced labor, human trafficking,



- Environmental damages,
- Public health and/or product safety threat
- Revealing company secrets,
- Violation of confidentiality and privacy,
- Improper use of Biotrend assets,
- Conflicts of interest,
- External stakeholder human rights issues.

NOTIFICATION CHANNELS

Biotrend employees are expected to report ethical and legal violations in writing.

Ethical and legal violations can be reported through the Biotrend Hotline (etik@biotrendenerji.com.tr) and/or employees can openly share unethical and inappropriate behavior with the Director of Risk and Compliance.

The Biotrend Hotline is a private and confidential hotline that can be used for both internal and external whistleblowing.

PRIVACY

Biotrend manages the process confidentially, respecting the privacy of those who report its ethics hotline.

In notifications directly transmitted to the ethics hotline, the identity of the whistleblower is disclosed only to those who deal with the relevant notification and conduct the investigation, that is, authorized employees, unless otherwise required within the scope of legal situations such as judicial investigations and prosecutions.

PREVENTION OF RETALIATION

Biotrend will never allow action to be taken against an employee who cooperates in an investigation of an ethical violation, expresses concern or reports a suspected ethical violation in good faith (Anti-Retaliation Policy). Even if it is later found to be a false report, Biotrend considers the action of the person who expressed his concern "in good faith" as a sincere and correct attitude. For this reason, the necessary punishment is applied to the persons who are found to have taken a stand against the reporter and to retaliate in accordance with the Disciplinary Procedure.

Disciplinary action may also be taken against those who are found to have made an ethical statement maliciously without any justified suspicion, only for the purpose of wearing down people.

All kinds of notifications are evaluated and finalized as soon as possible. Notifications that do not have sufficient evidence or suspicion can also be closed without any additional action as a result of the investigation.

COMPLIANCE, MONITORING, AUDITING AND REPORTING

The Ethics Committee is responsible for determining notification, review and sanction mechanisms in case of non-compliance with these procedures, rules and regulations.

In case of detection of situations and non-compliance behaviors that are contrary to this procedure, criminal sanctions may be applied in accordance with the relevant legislation in the regions where we operate.



Feedback regarding this procedure and possible procedure violations and non-compliance are reported via etik@biotrendenerji.com.tr.

REVIEW

The Whistleblowing Procedure is periodically reviewed by the Ethics Committee. The coordination of the procedure is the responsibility of the Risk and Compliance Department.