

CORPORATE GOVERNANCE PRINCIPLES COMPLIANCE STATEMENT

Biotrend Çevre ve Enerji Yatırımları Anonim Şirketi (Biotrend) carries out its activities in accordance with the “Capital Markets Board Corporate Governance Principles” published by the CMB (II-17.1). Biotrend manages its relations with its shareholders, employees, customers, and all other related parties through an efficient governance and supervision approach, adopting the generally accepted components of corporate governance, such as accountability, equality, transparency, and responsibility.

Article 22 of the AoA, titled “Compliance with Corporate Governance Principles,” stipulates that the company adheres to the Corporate Governance Principles enforced by the CMB. Any transactions or resolutions made by the board that do not comply with the mandatory principles are considered null and void, constituting a violation of the AoA.

The company’s Corporate Governance Compliance Report (CRF) and Corporate Governance Information Form (CGIF) for the accounting period January 1, 2024–December 31, 2024, have been prepared in accordance with the presentation principles set forth in the CMB resolution no. 2/49 dated January 10, 2019, and the CMB Corporate Governance Communiqué no. II-17.1. Biotrend’s Corporate Governance Compliance Report (CGCR) and Corporate Governance Information Form (CGIF) for the accounting period January 1, 2024–December 31, 2024, are available on the company’s corporate website at www.biotrendenerji.com.tr/en under the heading “Investor Relations/Corporate Governance/ Corporate Governance Principles Compliance Reports” and on the Public Disclosure Platform’s corporate website at kap.gov.tr. The company will provide the necessary disclosures regarding any planned changes to its management practices within the framework of Corporate Governance Principles.

General Assembly Meetings

The company’s General Assembly meetings are held in accordance with all the principles outlined under the “General Assembly” section of the CGPs. In addition to the General Assembly meeting announcement, our corporate website includes all mandatory disclosures required by legislation as well as other matters that must be disclosed in accordance with the CGPs.

As such:

- » We published the total number of shares on our company website, which details the company’s share structure and provides information on voting rights, on the date of the General Assembly meeting announcement.
- » We prepared the General Assembly agenda by assigning each proposal a separate title and clearly describing the agenda item headings to prevent any misinterpretations. We

ensured that the agenda items were clearly defined and did not include vague terms such as “other” or “miscellaneous.” The information provided prior to the General Assembly meeting is shared in accordance with the agenda items.

» During the preparation of the Ordinary General Assembly agenda, no matters were requested in writing by shareholders to be added to the agenda items through the company’s Investor Relations Department. Similarly, no items were requested to be included on the agenda by shareholders, the CMB, or any other organizations and institutions related to the company.

» The method of holding the General Assembly meeting is designed to ensure maximum participation from the shareholders. Our General Assembly meetings are conducted in a manner that does not create inequality among shareholders. The General Assembly meetings are held at the company headquarters. On June 13, 2024, an Ordinary General Assembly meeting took place in Istanbul, where the company headquarters is located, in accordance with the company’s AoA. The company’s AoA allow the meetings to be held at other locations within the city where its headquarters is located.

» The meeting chair made the necessary arrangements and obtained the essential information before conducting the General Assembly in accordance with the TCC, the law, and the relevant legislation.

» The meeting chair ensured that the agenda items were presented impartially, thoroughly, and in a clear and understandable manner during the Ordinary General Assembly. Shareholders were provided with an equal opportunity to express their views and ask questions. The meeting chair ensured that shareholders’ questions, except those related to trade secrets, were answered directly at the General Assembly.

» Executive Board Members, at least one other Board Member, and a representative of the independent audit company participate in the General Assembly meetings. Additionally, individuals with responsibilities related to the agenda items and those who need to make statements are required to be present. If individuals, other than those legally required to attend, are absent from the meeting, the chair presents the reasons for their absence to the General Assembly. The CMB resolution No. 4/89 dated February 1, 2013, applies in this regard. Shareholders, some board members, a representative of the Independent Auditing Firm, and company employees who were to make statements on agenda items participated in the Ordinary General Assembly for the 2023 fiscal year.

The Ordinary General Meeting for the 2023 fiscal year was held on June 13, 2024, at 10:30 a.m. at Kavacık Mah., Ertürk Sk., No: 3/1, İç Kapı No: 1, Beykoz/Istanbul. The Ordinary General Assembly was attended by shareholders, some board members, a representative of the Independent Auditing Firm, and company employees designated to make statements on the agenda items. At the General Assembly Meeting, 311,753,726.132 shares out of the 500,000,000 shares representing the company’s capital were

represented. Questions regarding the agenda items from shareholders attending the meeting in person or by proxy were answered during the meeting. The meeting minutes and attendance list were disclosed to the public through the PDP on the same day. Meeting minutes and the list of attendees are available to shareholders on the corporate website. Board members did not engage in any transactions under Articles 395–396 of the TCC, based on the permission granted in the previous year.

An Extraordinary General Meeting was held on April 5, 2024, at 10:30 a.m. at Kavacık Mah., Ertürk Sk., No: 3/1, İç Kapı No: 1, Beykoz/Istanbul. The shareholders, some board members, a representative of the Independent Auditing Firm, and company employees who were to make statements on agenda items participated in the Extraordinary General Assembly.

At the General Assembly Meeting, 320,927,358.169 shares out of the 500,000,000 shares corresponding to the company's capital were represented. Questions regarding the agenda items from shareholders attending the meeting in person or by proxy were answered during the meeting. The meeting minutes and attendance list were disclosed to the public through the PDP on the same day. Meeting minutes and the list of attendees are available to shareholders on the corporate website.

Pursuant to Article 14 of the AoA, the General Assembly sets the upper limit for donations. Donations exceeding this limit are not permitted, and all donations made are added to the distributable profit base. The company's donations must comply with the Capital Markets Law's regulations on concealed profit transfer, the TCC, and other applicable legislation. Necessary material disclosures must be made, and donations made throughout the year must be presented to shareholders at the General Assembly. At the General Assembly Meeting held on June 13, 2024, it was reported that the company donated 1,952,430 Turkish lira in 2023, and the upper limit for donations and charitable contributions was set at 2.000.000 Turkish lira for 2024.

Meeting minutes of the General Assembly, including those from past years, are available on the corporate website at www.biotrendenerji.com.tr/en.

Voting and Minority Rights

The company avoids practices that hinder shareholders' voting rights. It establishes the necessary mechanisms to ensure that each shareholder can exercise their voting rights in the most convenient and appropriate manner. Pursuant to Article 10 of the AoA on Electronic Participation in the General Assembly, shareholders entitled to attend the company's General Assembly meetings may also participate electronically in accordance with Article 1527 of the TCC. At the Ordinary General Assembly Meeting held on June 13, 2024, in line with this provision of the AoA, the established system enabled shareholders and their representatives to exercise their rights as stipulated in the relevant regulation.

The company's AoA does not provide for any privileged shares or special voting rights. Each share entitles its holder to one (1) vote. Pursuant to Article 20 of the AoA, titled 'Minority Rights,' which governs the management of minority shares, shareholders representing one-twentieth of the capital cannot have their minority rights restricted or obstructed, nor can they be prevented from exercising these rights as stipulated in Articles 360, 411, 420, 439, 486, 531, and 559 of the TCC, as well as other relevant provisions of the TCC, the CML, CMB regulations, and other applicable legislation.

The Articles of Association stipulate that Minority Rights shall not exceed one-twentieth of the share capital. Although there is no regulation stipulating that these rights may be granted to those with a lower percentage, the exercise of these rights within the scope of the provisions of the Capital Markets Law and the Turkish Commercial Code, maximum care is taken in this regard.

A shareholder may apply to the commercial court where the Company's head office is located for the appointment of a special auditor within 30 days. There has been no request for the appointment of a special auditor during the period.

Transfer of Shares

The company's AoA does not include any provisions restricting the transfer of shares. The provisions of the TCC, the CML, energy market legislation, and other relevant legislation apply to share transfers. Shares can be freely transferred outside the stock exchange without any restrictions. The transfer of shares that are traded or will be traded on the stock exchange cannot be subject to any restrictions. In the event of a share buyback, the company complies with capital markets legislation and other relevant regulations, ensuring that all necessary material disclosures are made.

Public Disclosure and Transparency

Biotrend Çevre ve Enerji Yatırımları A.Ş. adopts the principle of publicly disclosing all statements in accordance with relevant legislation. The company follows an active and transparent disclosure policy. It complies with the CML in all public disclosure practices and aims to implement the most effective communication policy within the framework of the CMB CGPs.

The company's Disclosure Policy outlines the information to be disclosed to the public beyond what is mandated by legislation, as well as the frequency, methods, and channels of disclosure. It also defines how often the Board of Directors and executives will engage with the press, the frequency of public disclosure meetings, the approach to responding to inquiries directed at the company, and other related matters. The information to be disclosed to the public under the Public Disclosure and Transparency principle is made available on the "Public Disclosure Platform" and the corporate website at www.biotrendenerji.com.tr/en, in a timely, complete, comprehensible, and interpretable

manner to assist individuals and institutions in making informed decisions based on the disclosure.

A total of 53 material event disclosures were made throughout the year in accordance with CMB regulations. All material event disclosures were made promptly and published on our website. No annotations were requested.

The Disclosure Policy is available on the corporate website.

Corporate Governance Principles Information Form and Compliance Report

The Corporate Governance Compliance Report (CGCR) and Corporate Governance Information Form (CGIF) for the accounting period January 1, 2024–December 31, 2024, are available on the company’s corporate website at www.biotrendenerji.com.tr/en under the heading “Investor Relations/Corporate Governance/Corporate Governance Principles Compliance Reports” and on the Public Disclosure Platform’s corporate website at kap.gov.tr.

Related Companies

Related Funds

	Company Compliance Status					Explanation
	Yes	Partial	No	Exempted	Not Applicable	
Corporate Governance Compliance Report						
1.1. FACILITATING THE EXERCISE OF SHAREHOLDER RIGHTS						
1.1.2- Up-to-date information and disclosures which may affect the exercise of shareholder rights are available to investors at the corporate website.	X					
1.2. RIGHT TO OBTAIN AND REVIEW INFORMATION						
1.2.1 - Management did not enter into any transaction that would complicate the conduct of special audit.	X					
1.3. GENERAL ASSEMBLY						
1.3.2 - The company ensures the clarity of the General Assembly agenda, and that an item on the agenda does not cover multiple topics.	X					
1.3.7- Insiders with privileged information have informed the board of directors about transactions conducted on their behalf within the scope of the company's activities in order for these transactions to be presented at the General Shareholders' Meeting.					X	There has not been such a situation.
1.3.8 - Members of the board of directors who are concerned with specific agenda items, auditors, and other related persons, as well as the officers who are responsible for the preparation of the financial statements were present at the General Shareholders' Meeting.	X					
1.3.10 - The agenda of the General Shareholders' Meeting included a separate item detailing the amounts and beneficiaries of all donations and contributions.	X					
1.3.11 - The General Shareholders' Meeting was held open to the public, including the stakeholders, without having the right to speak.	X					
1.4. VOTING RIGHTS						
1.4.1 - There is no restriction preventing shareholders from exercising their shareholder rights.	X					
1.4.2 - The company does not have shares that carry privileged voting rights.	X					
1.4.3-The company withholds from exercising its voting rights at the General Shareholders' Meeting of any company with which it has cross-ownership, in case such cross-ownership provides management control.					X	There is no mutual participation relationship in our Company's capital.
1.5. MINORITY RIGHTS						
1.5.1 - The company pays maximum diligence to the exercise of minority rights.	X					
1.5.2 - The Articles of Association extend the use of minority rights to those who own less than one twentieth of the outstanding shares, and expand the scope of the minority rights.		X				
1.6. DIVIDEND RIGHT						
1.6.1 - The dividend policy approved by the General Shareholders' Meeting is posted on the company website.	X					
1.6.2 - The dividend distribution policy comprises the minimum information to ensure that the shareholders can have an opinion on the procedure and principles of dividend distributions in the future.	X					
1.6.3 - The reasons for retaining earnings, and their allocations, are stated in the relevant agenda item.	X					
1.6.4 - The board reviewed whether the dividend policy balances the benefits of the shareholders and those of the company.	X					
1.7. TRANSFER OF SHARES						
1.7.1 - There are no restrictions preventing shares from being transferred.	X					
2.1. CORPORATE WEBSITE						
2.1.1. - The company website includes all elements listed in Corporate Governance Principle 2.1.1.	X					

2.1.2 - The shareholding structure (names, privileges, number and ratio of shares, and beneficial owners of more than 5% of the issued share capital) is updated on the website at least every 6 months.	X					
2.1.4 - The company website is prepared in other selected foreign languages, in a way to present exactly the same information with the Turkish content.	X					The Turkish contents are in English. Some contents are in French.
2.2. ANNUAL REPORT						
2.2.1 - The board of directors ensures that the annual report represents a true and complete view of the company's activities.	X					
2.2.2 - The annual report includes all elements listed in Corporate Governance Principle 2.2.2.	X					
3.1. CORPORATION'S POLICY ON STAKEHOLDERS						
3.1.1- The rights of the stakeholders are protected pursuant to the relevant regulations, contracts and within the framework of bona fides principles.	X					
3.1.3 - Policies or procedures addressing stakeholders' rights are published on the company's website.	X					
3.1.4 - A whistleblowing programme is in place for reporting legal and ethical issues.	X					
3.1.5 - The company addresses conflicts of interest among stakeholders in a balanced manner.	X					
3.2. SUPPORTING THE PARTICIPATION OF THE STAKEHOLDERS IN THE CORPORATION'S MANAGEMENT						
3.2.1 - The Articles of Association, or the internal regulations (terms of reference/manuals), regulate the participation of employees in management.			X			There is no such regulation in the articles of association regarding the participation of the employees to the management.
3.2.2 - Surveys/other research techniques, consultation, interviews, observation method etc. were conducted to obtain opinions from stakeholders on decisions that significantly affect them.		X				The current methods of communication with the Stakeholders are specified in the Annual Report - Sustainability Approach - Stakeholder Relations-Current Methods of Communication with Key Stakeholders.
3.3. HUMAN RESOURCES POLICY						
3.3.1 - The company has adopted an employment policy ensuring equal opportunities, and a succession plan for all key managerial positions.	X					
3.3.2 - Recruitment criteria are documented.	X					
3.3.3 - The company has a policy on human resources development, and organises trainings for employees.	X					
3.3.4 - Meetings have been organised to inform employees on the financial status of the company, remuneration, career planning, education and health.	X					
3.3.5 - Employees, or their representatives, were notified of decisions impacting them. The opinion of the related trade unions was also taken.		X				Decisions that may affect employees are reported to them. The company is not a member of any union.
3.3.6 - Job descriptions and performance criteria have been prepared for all employees, announced to them and taken into account to determine employee remuneration.		X				Job descriptions have been completed. Performance criterias still continue.
3.3.7 - Measures (procedures, trainings, raising awareness, goals, monitoring, complaint mechanisms) have been taken to prevent discrimination, and to protect employees against any physical, mental, and emotional mistreatment.	X					
3.3.8 - The company ensures freedom of association and supports the right for collective bargaining.		X				The company does not have an agreement with any union.
3.3.9 - A safe working environment for employees is maintained.	X					
3.4. RELATIONS WITH CUSTOMERS AND SUPPLIERS						
3.4.1-The company measured its customer satisfaction, and operated to ensure full customer satisfaction.		X				The company's activities are always based on unconditional customer satisfaction.
3.4.2 - Customers are notified of any delays in handling their requests.	X					
3.4.3 - The company complied with the quality standards with respect to its products and services.	X					
3.4.4 - The company has in place adequate controls to protect the confidentiality of sensitive information and business secrets of its customers and suppliers.	X					

3.5. ETHICAL RULES AND SOCIAL RESPONSIBILITY						
3.5.1 - The board of the corporation has adopted a code of ethics, disclosed on the corporate website.	X					
3.5.2-The company has been mindful of its social responsibility and has adopted measures to prevent corruption and bribery.	X					
4.1. ROLE OF THE BOARD OF DIRECTORS						
4.1.1 - The board of directors has ensured strategy and risks do not threaten the long-term interests of the company, and that effective risk management is in place.	X					
4.1.2 - The agenda and minutes of board meetings indicate that the board of directors discussed and approved strategy, ensured resources were adequately allocated, and monitored company and management performance.	X					
4.2. ACTIVITIES OF THE BOARD OF DIRECTORS						
4.2.1-The board of directors documented its meetings and reported its activities to the shareholders.	X					
4.2.2 - Duties and authorities of the members of the board of directors are disclosed in the annual report.	X					
4.2.3-The board has ensured the company has an internal control framework adequate for its activities, size and complexity.	X					
4.2.4 - Information on the functioning and effectiveness of the internal control system is provided in the annual report.	X					
4.2.5 - The roles of the Chairman and Chief Executive Officer are separated and defined.	X					
4.2.7-The board of directors ensures that the Investor Relations department and the corporate governance committee work effectively. The board works closely with them when communicating and settling disputes with shareholders.	X					
4.2.8 - The company has subscribed to a Directors and Officers liability insurance covering more than 25% of the capital.	X					
4.3. STRUCTURE OF THE BOARD OF DIRECTORS						
4.3.9 - The board of directors has approved the policy on its own composition, setting a minimal target of 25% for female directors. The board annually evaluates its composition and nominates directors so as to be compliant with the policy.	X					
4.3.10 - At least one member of the audit committee has 5 years of experience in audit/accounting and finance.	X					
4.4. BOARD MEETING PROCEDURES						
4.4.1-Each board member attend the majority of the board meetings in person or via an electronic board meeting system	X					
4.4.2 - The board has formally approved a minimum time by which information and documents relevant to the agenda items should be supplied to all board members.	X					
4.4.3 - The opinions of board members that could not attend the meeting, but did submit their opinion in written format, were presented to other members.	X					
4.4.4 - Each member of the board has one vote.	X					
4.4.5 - The board has a charter/written internal rules defining the meeting procedures of the board.	X					
4.4.6 - Board minutes document that all items on the agenda are discussed, and board resolutions include director's dissenting opinions if any.	X					
4.4.7-There are limits to external commitments of board members. Shareholders are informed of board members' external commitments at the General Shareholders' Meeting.	X					
4.5. BOARD COMMITTEES						
4.5.5 - Board members serve in only one of the Board's committees.			X			Because of the number of Independent Board Members, each board member takes office in more than one committee.
4.5.6 - Committees have invited persons to the meetings as deemed necessary to obtain their views.	X					
4.5.7 - If external consultancy services are used, the independence of the provider is stated in the annual report.	X					
4.5.8 - Minutes of all committee meetings are kept and reported to board members.	X					
4.6. FINANCIAL RIGHTS						
4.6.1-The board of directors has conducted a board performance evaluation to review whether it has discharged all its responsibilities effectively.	X					

<p>4.6.4-The company did not extend any loans to its board directors or executives, nor extended their lending period or enhanced the amount of those loans, or improve conditions thereon, and did not extend loans under a personal credit title by third parties or provided guarantees such as surety in favour of them.</p>	<p>X</p>			
<p>4.6.5 - The individual remuneration of board members and executives is disclosed in the annual report.</p>			<p>X</p>	<p>Salaries, bonuses and similar benefits provided to senior executives are shared collectively in the annual report and they are not disclosed on an individual basis.</p>

1. SHAREHOLDERS

Related Companies

Related Funds

1. SHAREHOLDERS	
1.1. Facilitating the Exercise of Shareholders Rights	
The number of investor meetings (conference, seminar/etc.) organised by the company during the year	The Company organised 105 investor conferences and meetings in 2024 (4 webcast presentation meetings, 101 investor and analyst meetings).
1.2. Right to Obtain and Examine Information	
The number of special audit request(s)	No special auditor has been requested.
The number of special audit requests that were accepted at the General Shareholders' Meeting	No special auditor was requested at the general assembly.
1.3. General Assembly	
Link to the PDP announcement that demonstrates the information requested by Principle 1.3.1. (a-d)	https://www.kap.org.tr/en/Bildirim/1288584 https://www.kap.org.tr/en/Bildirim/1258840
Whether the company provides materials for the General Shareholders' Meeting in English and Turkish at the same time	Presented simultaneously.
The links to the PDP announcements associated with the transactions that are not approved by the majority of independent directors or by unanimous votes of present board members in the context of Principle 1.3.9	There was no such transaction during the year.
The links to the PDP announcements associated with related party transactions in the context of Article 9 of the Communique on Corporate Governance (II-17.1)	There is no such transaction under Article 9.
The links to the PDP announcements associated with common and continuous transactions in the context of Article 10 of the Communique on Corporate Governance (II-17.1)	There is no such transaction under Article 10.
The name of the section on the corporate website that demonstrates the donation policy of the company	Investor Relations/ Corporate Governance/ Policies/ Donation and Sponsorship Policy
The relevant link to the PDP with minute of the General Shareholders' Meeting where the donation policy has been approved	https://www.kap.org.tr/en/Bildirim/1025561
The number of the provisions of the articles of association that discuss the participation of stakeholders to the General Shareholders' Meeting	Article 10 General Assembly

Identified stakeholder groups that participated in the General Shareholders' Meeting, if any	The Extraordinary General Assembly Meeting held on 05.04.2024 and the Ordinary General Assembly Meeting for 2023 held on 13.06.2024 were held open to stakeholders and the public without the right to speak.
1.4. Voting Rights	
Whether the shares of the company have differential voting rights	Hayır (No)
In case that there are voting privileges, indicate the owner and percentage of the voting majority of shares.	-
The percentage of ownership of the largest shareholder	% 54,5
1.5. Minority Rights	
Whether the scope of minority rights enlarged (in terms of content or the ratio) in the articles of the association	Hayır (No)
If yes, specify the relevant provision of the articles of association.	-
1.6. Dividend Right	
The name of the section on the corporate website that describes the dividend distribution policy	Investor Relations/ Corporate Governance/ Policies/ Dividend Distribution Policy
	Text of the minutes of the 6th item of the agenda of the Ordinary General Assembly for the year 2023 held on 13 June 2024:Discussions proceeded on the proposal made by the Board of Directors regarding the distribution of the dividends of 2023 and on the attached dividend distribution statement. The consolidated balance sheets for the period of January 1 to December 31, 2023, prepared by Biotrend Çevre ve Enerji Yatırımları A.Ş. and audited by RSM Turkey Uluslararası Bağımsız Denetim A.Ş. indicated the period profit of the main partnership to be 948.123.057 Turkish lira. As per our non-consolidated legal reports prepared in line with the Turkish Tax

Minutes of the relevant agenda item in case the board of directors proposed to the general assembly not to distribute dividends, the reason for such proposal and information as to use of the dividend.

Procedural Law, we registered a net loss of 54.241.611 Turkish lira and a net loss of 992.328.898 Turkish lira from previous year. Since the Company's unconsolidated financial statements prepared in accordance with the provisions of the V.U.K., the proposal of the Board of Directors of the Company regarding the nondistribution of dividend by offsetting the profit for the period of 2023 against the losses of the previous period was unanimously accepted as a result of the voting in electronic and physical environment with a nominal positive vote of TL 311,753,726.132 in electronic and physical environment against a nominal negative vote of TL 0.

PDP link to the related general shareholder meeting minutes in case the board of directors proposed to the general assembly not to distribute dividends

<https://www.kap.org.tr/en/Bildirim/1298958>

General Assembly Meetings

General Meeting Date	The number of information requests received by the company regarding the clarification of the agenda of the General Shareholders' Meeting	Shareholder participation rate to the General Shareholders' Meeting	Percentage of shares directly present at the GSM	Percentage of shares represented by proxy	Specify the name of the page of the corporate website that contains the General Shareholders' Meeting minutes, and also indicates for each resolution the voting levels for or against	Specify the name of the page of the corporate website that contains all questions asked in the general assembly meeting and all responses to them	The number of the relevant item or paragraph of General Shareholders' Meeting minutes in relation to related party transactions	The number of declarations by insiders received by the board of directors	The link to the related PDP general shareholder meeting notification
05/04/2024	0	% 64,18	% 64,17	% 0,01	Investor Relations/ Corporate Governance/ General Assembly Meetings	Investor Relations/ Corporate Governance / General Assembly Meetings	-	26	https://www.kap.org.tr/en/Bildirim/1268486
13/06/2024	0	% 64	% 63,3	% 0,07	Investor Relations/ Corporate Governance/ General Assembly Meetings	Investor Relations/ Corporate Governance / General Assembly Meetings	Article 7	26	https://www.kap.org.tr/en/Bildirim/1298958

2. DISCLOSURE AND TRANSPARENCY

2. DISCLOSURE AND TRANSPARENCY	
2.1. Corporate Website	
<p>Specify the name of the sections of the website providing the information requested by the Principle 2.1.1.</p>	<p>Information Society Services, Investor Relations / Corporate Governance / Trade Registry Information, Company Profile / Board of Directors, Investor Relations / Corporate Governance / Articles of Association, Investor Relations / Material Disclosures, Investor Relations / Financial Data and Presentations / Financial Reports, Investor Relations / Financial Data and Presentations / Annual Reports, Investor Relations / Public Offering / Public Offering Documents, Investor Relations / Capital Increases, Investor Relations / Corporate Governance / General Assembly, Investor Relations / Corporate Governance / Policies / Dividend Distribution Policy, Investor Relations / Corporate Governance / Policies / Information Policy</p>
<p>If applicable, specify the name of the sections of the website providing the list of shareholders (ultimate beneficiaries) who directly or indirectly own more than 5% of the shares.</p>	<p>Company Profile / Shareholding Structure</p>
<p>List of languages for which the website is available</p>	<p>Turkish, English, French</p>
2.2. Annual Report	

The page numbers and/or name of the sections in the Annual Report that demonstrate the information requested by principle 2.2.2.

<p>a) The page numbers and/or name of the sections in the Annual Report that demonstrate the information on the duties of the members of the board of directors and executives conducted out of the company and declarations on independence of board members</p>	<p>Corporate Governance/ Board Committees and Evaluation of the Board of Directors, Corporate Governance / Declarations of Independence</p>
<p>b) The page numbers and/or name of the sections in the Annual Report that demonstrate the information on committees formed within the board structure</p>	<p>Corporate Governance/ Board Committees and Evaluation of the Board of Directors/Committee Working Principles</p>
<p>c) The page numbers and/or name of the sections in the Annual Report that demonstrate the information on the number of board meetings in a year and the attendance of the members to these meetings</p>	<p>Corporate Governance/ Board Committees and Evaluation of the Board of Directors/Board of Directors Operating Principles</p>
<p>c) The page numbers and/or name of the sections in the Annual Report that demonstrate the information on amendments in the legislation which may significantly affect the activities of the corporation</p>	<p>Corporate Governance/ Other Matters/Legislative Amendments in 2024</p>
<p>d) The page numbers and/or name of the sections in the Annual Report that demonstrate the information on significant lawsuits filed against the corporation and the possible results thereof</p>	<p>Corporate Governance/ Other Matters/ Information on Lawsuits Filed Against the Company that may Affect the Financial Position and Activities of the Company and Their Possible Outcomes</p>
<p>e) The page numbers and/or name of the sections in the Annual Report that demonstrate the information on the conflicts of interest of the corporation among the institutions that it purchases services on matters such as investment consulting and rating and the measures taken by the corporation in order to avoid from these conflicts of interest</p>	<p>Corporate Governance/ Other Matters/ Information on Conflicts of Interest between the Company and Institutions Providing Investment Consultancy and Rating Services and Measures Taken to Prevent the Same</p>
<p>f) The page numbers and/or name of the sections in the Annual Report that demonstrate the information on the cross ownership subsidiaries that the direct contribution to the capital exceeds 5%</p>	<p>None</p>
<p>g) The page numbers and/or name of the sections in the Annual Report that demonstrate the information on social rights and professional training of the employees</p>	<p>Human Resources/Social Rights/Training and Information,</p>

and activities of corporate social responsibility in respect of the corporate activities that arises social and environmental results

Sustainability/Corporate Social Responsibility Projects

3. STAKEHOLDERS

3. STAKEHOLDERS	
3.1. Corporation's Policy on Stakeholders	
The name of the section on the corporate website that demonstrates the employee remedy or severance policy	Investor Relations/ Corporate Governance/ Policies/Employee Compensation Policy
The number of definitive convictions the company was subject to in relation to breach of employee rights	2
The position of the person responsible for the alert mechanism (i.e. whistleblowing mechanism)	Legal Department
The contact detail of the company alert mechanism	etik@ biotrendenerji.com.tr, Investor Relations/ Corporate Governance/ Policies/Ethic Notification Procedure, Annual Report/ Corporate Governance/ Information on Risk Management Practices/ Biotrend Enerji Ethics Management
3.2. Supporting the Participation of the Stakeholders in the Corporation's Management	
Name of the section on the corporate website that demonstrates the internal regulation addressing the participation of employees on management bodies	-
Corporate bodies where employees are actually represented	Occupational Health and Safety Board
3.3. Human Resources Policy	
The role of the board on developing and ensuring that the company has a succession plan for the key management positions	Succession plan is available.
The name of the section on the corporate website that demonstrates the human resource policy covering equal opportunities and hiring principles. Also provide a summary of relevant parts of the human resource policy.	Investor Relations/ Corporate Governance/ Policies/Diversity and Equal Opportunity Policy, Investor Relations/ Corporate Governance/ Policies/Human Rights Policy

Whether the company provides an employee stock ownership programme	Pay edindirme plani bulunmuyor (There isn't an employee stock ownership programme)
The name of the section on the corporate website that demonstrates the human resource policy covering discrimination and mistreatments and the measures to prevent them. Also provide a summary of relevant parts of the human resource policy.	Investor Relations/ Corporate Governance/ Policies/Diversity and Equal Opportunity Policy, Investor Relations/ Corporate Governance/ Policies/Human Rights Policy, Investor Relations/ Corporate Governance/ Policies/Anti-Retaliation Policy, Investor Relations/ Corporate Governance/ Policies/Compliance Policy
The number of definitive convictions the company is subject to in relation to health and safety measures	-
3.5. Ethical Rules and Social Responsibility	
The name of the section on the corporate website that demonstrates the code of ethics	Investor Relations/ Corporate Governance/ Policies/Code of Business Ethics
The name of the section on the company website that demonstrates the corporate social responsibility report. If such a report does not exist, provide the information about any measures taken on environmental, social and corporate governance issues.	www.biotrendenerji.com.tr/en/Sustainability/2023 Sustainability Report
Any measures combating any kind of corruption including embezzlement and bribery	Investor Relations/ Corporate Governance/ Policies/Anti-Bribery and Anti-Corruption Policy, Investor Relations/ Corporate Governance/ Policies/Anti-Money Laundering and Prevention of the Financing of Terrorism Policy, Investor Relations/Corporate Governance/Policies/Code of Business Ethics, Investor Relations/Corporate Governance/Policies/ Compliance Policy

4. BOARD OF DIRECTORS-I

4. BOARD OF DIRECTORS-I	
4.2. Activity of the Board of Directors	
Date of the last board evaluation conducted	Once a year.
Whether the board evaluation was externally facilitated	Hayır (No)
Whether all board members released from their duties at the GSM	Evet (Yes)
Name(s) of the board member(s) with specific delegated duties and authorities, and descriptions of such duties	İlhan Doğan- Chairman of the Board of Directors, Murat Doğan- Deputy Chairman of the Board of Directors, Adnan Doğan- Board Member, Oğün Doğan- Board Member, Doruk Doğan- Board Member, Osman Nuri Vardi- Board Member, Hanife Öztürk Akkartal- Independent Board Member, Mevhibe Canan Özsoy- Independent Board Member, Bilgün Gürkan- Independent Board Member
Number of reports presented by internal auditors to the audit committee or any relevant committee to the board	15
Specify the name of the section or page number of the annual report that provides the summary of the review of the effectiveness of internal controls	Corporate Governance/ Other Matters/Internal Audit and Internal Control Activities
Name of the Chairman	İlhan Doğan
Name of the CEO	Özgür Umut Eroğlu
If the CEO and Chair functions are combined: provide the link to the relevant PDP announcement providing the rationale for such combined roles	There has been no such situation.
Link to the PDP notification stating that any damage that may be caused by the members of the board of directors during the discharge of their duties is insured for an amount exceeding 25% of the company's capital	https://www.kap.org.tr/en/Bildirim/1295185
The name of the section on the corporate website that demonstrates current diversity policy targeting women directors	-

The number and ratio of female directors within the Board of Directors

3, %33

Composition of Board of Directors

Name, Surname of Board Member	Whether Executive Director Or Not	Whether Independent Director Or Not	The First Election Date To Board	Link To PDP Notification That Includes The Independency Declaration	Whether the Independent Director Considered By The Nomination Committee	Whether She/He is the Director Who Ceased to Satisfy The Independence or Not	Whether The Director Has At Least 5 Years' Experience On Audit, Accounting And/Or Finance Or Not
İLHAN DOĞAN	İcrada görevli (Executive)	Bağımsız üye değil (Not independent director)	21/04/2020	-	İlgisiz (Not applicable)	İlgisiz (Not applicable)	Hayır (No)
MURAT DOĞAN	İcrada görevli (Executive)	Bağımsız üye değil (Not independent director)	21/04/2020	-	İlgisiz (Not applicable)	İlgisiz (Not applicable)	Evet (Yes)
ADNAN DOĞAN	İcrada görevli (Executive)	Bağımsız üye değil (Not independent director)	18/02/2025	-	İlgisiz (Not applicable)	İlgisiz (Not applicable)	Hayır (No)
OGÜN DOĞAN	İcrada Görevli Değil (Non-executive)	Bağımsız üye değil (Not independent director)	21/04/2020	-	İlgisiz (Not applicable)	İlgisiz (Not applicable)	Evet (Yes)
DORUK DOĞAN	İcrada görevli (Executive)	Bağımsız üye değil (Not independent director)	21/04/2020	-	İlgisiz (Not applicable)	İlgisiz (Not applicable)	Evet (Yes)
OSMAN NURİ VARDI	İcrada Görevli Değil (Non-executive)	Bağımsız üye değil (Not independent director)	21/04/2020	-	İlgisiz (Not applicable)	İlgisiz (Not applicable)	Hayır (No)
HANİFE ÖZTÜRK AKKARTAL	İcrada Görevli Değil (Non-executive)	Bağımsız üye (Independent director)	25/02/2021	https://www.kap.org.tr/Bildirim/1138543	Değerlendirildi (Considered)	Hayır (No)	Hayır (No)
BİLGÜN GÜRKAN	İcrada Görevli Değil (Non-executive)	Bağımsız üye (Independent director)	05/04/2024	https://www.kap.org.tr/Bildirim/1138543	Değerlendirildi (Considered)	Hayır (No)	Evet (Yes)

MEVHİBE CANAN ÖZSOY	İcrada Görevli Değil (Non-executive)	Bağımsız üye (Independent director)	05/04/ 2024	https:// www.kap.org.tr/ tr/Bildirim/ 1138543	Değerlendirildi (Considered)	Hayır (No)	Hayır (No)
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4. BOARD OF DIRECTORS-II

4. BOARD OF DIRECTORS-II	
4.4. Meeting Procedures of the Board of Directors	
Number of physical or electronic board meetings in the reporting period	13
Director average attendance rate at board meetings	% 92
Whether the board uses an electronic portal to support its work or not	Evet (Yes)
Number of minimum days ahead of the board meeting to provide information to directors, as per the board charter	In the meetings held periodically, the agenda, information and documents related to the agenda are sent to the members of the Board of Directors via e-mail three (3) days prior to the Board of Directors Meeting.
The name of the section on the corporate website that demonstrates information about the board charter	Related matters are included in Article 8 of the Articles of Association , Board of Directors Meetings Section, in the Investor Relations/ Corporate Governance section of the corporate website.
Number of maximum external commitments for board members as per the policy covering the number of external duties held by directors	-
4.5. Board Committees	
Page numbers or section names of the annual report where information about the board committees are presented	Corporate Governance/ Board Committees and Evaluation of the Board of Directors/Board Committees
Link(s) to the PDP announcement(s) with the board committee charters	https://www.kap.org.tr/tr/Bildirim/960843

Composition of Board Committees-I



Names Of The Board Committees	Name Of Committees Defined As " Other" In The First Column	Name-Surname of Committee Members	Whether Committee Chair Or Not	Whether Board Member Or Not
Denetim Komitesi (Audit Committee)	-	Bilgün GÜRKAN	Evet (Yes)	Yönetim kurulu üyesi (Board member)
Denetim Komitesi (Audit Committee)	-	Hanife Öztürk AKKARTAL	Hayır (No)	Yönetim kurulu üyesi (Board member)
Denetim Komitesi (Audit Committee)	-	Mevhibe Canan ÖZSOY	Hayır (No)	Yönetim kurulu üyesi (Board member)
Kurumsal Yönetim Komitesi (Corporate Governance Committee)	-	Bilgün GÜRKAN	Evet (Yes)	Yönetim kurulu üyesi (Board member)
Kurumsal Yönetim Komitesi (Corporate Governance Committee)	-	Hanife Öztürk AKKARTAL	Hayır (No)	Yönetim kurulu üyesi (Board member)
Kurumsal Yönetim Komitesi (Corporate Governance Committee)	-	Gözde ÇİVİCİ	Hayır (No)	Yönetim kurulu üyesi değil (Not board member)
Riskin Erken Saptanması Komitesi (Committee of Early Detection of Risk)	-	Hanife Öztürk AKKARTAL	Evet (Yes)	Yönetim kurulu üyesi (Board member)
Riskin Erken Saptanması Komitesi (Committee of Early Detection of Risk)	-	Mevhibe Canan ÖZSOY	Hayır (No)	Yönetim kurulu üyesi (Board member)
Riskin Erken Saptanması Komitesi (Committee of Early Detection of Risk)	-	Osman Nuri VARDI	Hayır (No)	Yönetim kurulu üyesi (Board member)
Diğer (Other)	Sustainability Committee	Mevhibe Canan ÖZSOY	Evet (Yes)	Yönetim kurulu üyesi (Board member)
Diğer (Other)	Sustainability Committee	Bilgün GÜRKAN	Hayır (No)	Yönetim kurulu üyesi (Board member)
Diğer (Other)	Sustainability Committee	Mehmet Ali NALÇACIOĞLU	Hayır (No)	Yönetim kurulu üyesi değil (Not board member)
Diğer (Other)	Sustainability Committee	Burak YURTSEVER	Hayır (No)	Yönetim kurulu üyesi değil (Not board member)

Diđer (Other)	Sustainability Committee	Gözde ÇİVİCİ	Hayır (No)	Yönetim kurulu üyesi deđil (Not board member)
Diđer (Other)	Sustainability Committee	Akif Emre DEMİR	Hayır (No)	Yönetim kurulu üyesi deđil (Not board member)

4. BOARD OF DIRECTORS-III

4. BOARD OF DIRECTORS-III	
4.5. Board Committees-II	
Specify where the activities of the audit committee are presented in your annual report or website (Page number or section name in the annual report/website)	Corporate Governance/ Board Committees and Evaluation of the Board of Directors/Committee Working Principles
Specify where the activities of the corporate governance committee are presented in your annual report or website (Page number or section name in the annual report/website)	Corporate Governance/ Board Committees and Evaluation of the Board of Directors/Committee Working Principles
Specify where the activities of the nomination committee are presented in your annual report or website (Page number or section name in the annual report/website)	Corporate Governance/ Board Committees and Evaluation of the Board of Directors/Committee Working Principles
Specify where the activities of the early detection of risk committee are presented in your annual report or website (Page number or section name in the annual report/website)	Corporate Governance/ Board Committees and Evaluation of the Board of Directors/Committee Working Principles
Specify where the activities of the remuneration committee are presented in your annual report or website (Page number or section name in the annual report/website)	Corporate Governance/ Board Committees and Evaluation of the Board of Directors/Committee Working Principles
4.6. Financial Rights	
Specify where the operational and financial targets and their achievement are presented in your annual report (Page number or section name in the annual report)	Key Financial and Operational Indicators
Specify the section of website where remuneration policy for executive and non-executive directors are presented.	Corporate Governance/ Policies/Compensation Policy
Specify where the individual remuneration for board members and senior executives are presented in your annual report (Page number or section name in the annual report)	Other Matters/Financial Benefits Provided to Board Members and Senior Executives

Names Of The Board Committees	Name of committees defined as "Other" in the first column	The Percentage Of Non-executive Directors	The Percentage Of Independent Directors In The Committee	The Number Of Meetings Held In Person	The Number Of Reports On Its Activities Submitted To The Board
Denetim Komitesi (Audit Committee)	-	% 100	% 100	6	6
Kurumsal Yönetim Komitesi (Corporate Governance Committee)	-	% 67	% 67	9	9
Riskin Erken Saptanması Komitesi (Committee of Early Detection of Risk)	-	% 100	% 100	6	6
Diğer (Other)	Sustainability Committee	% 33	% 33	4	4