

ARTICLE 1 – PURPOSE

1.1. Beta Enerji ve Teknoloji A.Ş. (hereinafter referred to as the "Company") commits to acting in compliance with applicable competition law regulations, thereby creating an ethical and fair competitive environment. The **Competition Policy** (hereinafter referred to as the "Policy") has been published to provide guidance ensuring that Company employees and business partners refrain from anti-competitive behaviors, and act in accordance with competition law and the Company's ethical standards.

ARTICLE 2 – DEFINITIONS

2.1. This section briefly explains specific terms and concepts used in the Policy:

Company: Beta Enerji ve Teknoloji A.Ş.

Policy: Competition Policy.

Employee: Company's managers and employees.

ARTICLE 3 - SCOPE

3.1. This Policy applies to:

- a) Members of the Company's Board of Directors,
- b) Company Employees,
- c) Companies and their employees from whom goods and services are procured,
- d) Other individuals and entities acting on behalf of the Company—including consultants, lawyers, advisors, and external auditors—as well as customers and other parties with whom the Company maintains commercial relationships ("Business Partners").

ARTICLE 4 – PRINCIPLES AND GUIDELINES

4.1. The Company strictly opposes practices that violate competition law and regulations, such as forming cartels, price manipulation, or restricting competition, and commits to conducting all competitive activities within a fair, transparent, and lawful framework.

4.2. Compliance with Laws and Competition Rules

4.2.1. The Company and its employees shall fully comply with applicable competition laws.

4.3. Avoidance of Agreements and Negotiations with Competitors

4.3.1. The Company does not engage in illegal agreements or activities aimed at restricting competition under any circumstances. Meetings and discussions with competitors must be conducted with caution, fully respecting competition law compliance.

4.4. Prohibition of Abuse of Dominant Position

4.4.1. The Company develops policies and processes to prevent the abuse of a dominant position. Anti-competitive behaviors and unfair practices such as excluding competitors from the market must be strictly avoided in markets where the Company holds a dominant position.

4.5. Trade Secrecy and Information Sharing

4.5.1. Employees must avoid sharing the Company's trade secrets or confidential information that could affect its competitive advantage with competitors, and should implement necessary measures to maintain trade secrecy.

4.6. Avoidance of Participation in Anti-Competitive Associations

4.6.1. The Company assesses the risk of anti-competitive behavior within sectoral associations and implements necessary preventive measures.

4.7. Ticari İşbirliği Anlaşmalarının Rekabet Kurallarına Uygunluğu

4.7.1. The Company ensures that all commercial cooperation agreements comply fully with competition regulations. All agreements and communications involving customers, suppliers, business partners, and competitors must adhere strictly to competition law and ethical standards.

ARTICLE 5 – DUTIES AND RESPONSIBILITIES

5.1. Board of Directors

5.1.1. The Board of Directors and the Audit Committee operating under its authority are responsible for overseeing the implementation of the principles and guidelines outlined in this Policy, as well as for defining and operating the notification, investigation, and sanction mechanisms concerning violations or suspected breaches of these principles and guidelines.

5.2. Legal Department

5.2.1. The Legal Department, on behalf of the Board of Directors, is responsible for preparing and developing this Policy. The Legal Department reviews this Policy periodically for relevance and development needs and provides recommendations to the Board of Directors as necessary.

5.3. Disciplinary and Ethics Honor Board

5.3.1. The Disciplinary and Ethics Honor Board establishes the necessary communication channels for reporting violations or suspicious situations contrary to the principles and guidelines stated in the Policy and ensures measures are taken to protect the confidentiality and safety of individuals submitting reports.

5.3.2. The Disciplinary and Ethics Honor Board carefully addresses and investigates all received complaints and reports. If a violation is confirmed through investigation, the Board forwards the matter, along with relevant evidence and documentation, to the Internal Audit Department. Additionally, it establishes mechanisms and takes necessary measures to prevent recurrence of the same violation.

5.4. Employees

5.4.1. Company employees are responsible for complying with this Policy, adhering to internal and external regulations, and reporting any conduct, attitude, action, process, decision, activity, or practice that violates the Policy through the Ethics Line.

Ethics Line

E-mail: etikhat@betaenerji.com

Address: Hacı Sabancı Organize Sanayi Bölgesi, Çanakkale Cad. No:11/B Sarıçam, ADANA, Turkey

ARTICLE 6 – ENFORCEMENT

6.1. This Policy was enacted by the decision of the Board of Directors dated April 4, 2025, and shall remain valid and in force until further notice.

ARTICLE 7 – REVIEW

7.1. This Policy is reviewed annually by the Disciplinary and Ethics Honor Board and the Legal Department, based on controls related to process or technical infrastructure changes. The revised and updated version of this Policy is subject to approval by the Board of Directors.

ARTICLE 8 – RELATED POLICIES AND PROCEDURES

Ethical Conduct Policy