

1. 1. PURPOSE AND SCOPE

Purpose: The purpose of this Policy is to encourage the reporting, without fear or concern, through Aras Kargo's Ethics Reporting Contact Details (the "Reporting Channels") of conduct that is contrary to the Code of Conduct and Ethics and related policies, as well as applicable national and international laws and regulations, and of circumstances giving rise to reasonable suspicion, and to establish a secure framework for such reporting.

Scope: This Policy, which forms an integral part of the Aras Kargo Code of Conduct and Ethics, applies to Aras Kargo Yurt İçi Yurt Dışı Taşımacılık A.Ş. ("Aras Kargo"), all subsidiaries controlled by Aras Kargo (the "Subsidiaries"), its agents, and their employees and/or representatives (the "Employees"). Under this Policy, Aras Kargo protects persons who make Reports in good faith against any acts of retaliation to which they may be exposed.

2. 2. DEFINITIONS

Reporting Assessment Team: Means the team composed of the Internal Control, Corporate Risk Management and Compliance Counsel and the Internal Audit Manager.

Reporting Channels: Means Aras Kargo's "bildirim@araskargo.com.tr" e-mail address, reporting hotline at "+90 0541 667 44 45", and the reporting panel available on Aras Kargo's website.

Ethics Violation / Ethics Violation Report: Means matters submitted through the Reporting Channels that are determined to constitute non-compliance with Compliance Policies, as well as matters concerning harassment, violence and insult submitted to the Reporting Channels through Trusted Advisors.

Ethics Committee: Means the committee composed of the Vice Presidents of Human and Culture, Legal, Compliance and Internal Audit, together with the Internal Control, Corporate Risk Management and Compliance Counsel and the Internal Audit Manager.

Ethics Violation Reporter: Means any person who makes a report through the Reporting Channels or Trusted Advisors, or directly to the Compliance Advisory or Internal Audit Department, whether identified by name or anonymously.

Trusted Advisors: Means persons designated and trained to serve as an alternative reporting channel, outside the Reporting Channels, through whom Employees may raise concerns relating to harassment, violence and insult within the Company.

Ethics Violation Reporting Assessment Register: Means the register in which all reports are assigned a reference number and recorded, containing the report number, date received, reporting channel, subject category, status, outcome and closure date.

Retaliation: Means any adverse conduct, including but not limited to exclusion, harassment, discrimination, threats, deprivation of rights, demotion, prevention of promotion, limitation of career opportunities, reassignment, or giving an adverse performance assessment, as defined in PL.HKK.11 Anti-Retaliation Policy, directed against a person who reports a breach or suspected breach of the Code of Conduct and Ethics or any national or international law or regulation through the Reporting Channels or to their managers.

3. 3. GENERAL PRINCIPLES

As one of Türkiye's postal service providers, Aras Kargo aims to operate in accordance with the highest standards of ethical conduct and integrity. This Policy establishes the methods and procedures for making an Ethics Violation Report and the principles governing its review.

Aras Kargo expects and encourages anyone who has knowledge of, or a reasonable suspicion concerning, any activity involving an Employee or business partner that is contrary to the Code of Conduct and Ethics or otherwise unlawful to use the reporting mechanism. Aras Kargo also supports and encourages its suppliers, customers and shareholders to raise concerns regarding potential misconduct or unethical conduct that may cause harm to the Company, its principal shareholder Österreichische Post AG, its Subsidiaries or the public.

4. 4. SUBJECT MATTER AND METHOD OF ETHICS VIOLATION REPORTING

A. A. Subject Matter:

An Ethics Violation Report may concern any matter submitted through the Reporting Channels that constitutes, or gives rise to a risk of, non-compliance with the Code of Conduct and Ethics or the Compliance Policies associated therewith.

I. I. Actions Against Employees

Aras Kargo does not tolerate any conduct towards its Employees that may violate applicable legislation, the Code of Conduct and Ethics, or any other policy issued by Aras Kargo, or that may disrupt the order, safety or harmony of the working environment. It is immaterial whether such conduct originates from an Employee, supplier or customer.

II. II. Actions Against Suppliers

Aras Kargo monitors and assesses risks through its supplier due diligence process. Any conduct by our suppliers that is contrary to the Code of Conduct and Ethics or the policies associated therewith is not tolerated.

III. III. Actions Against the Company

Employees shall not engage, in the performance of their duties, in conduct that is contrary to the Code of Conduct and Ethics, any other policy issued by Aras Kargo, or applicable law. All Employees shall refrain from conduct and activities that may cause direct or indirect harm to Aras Kargo, whether financial or otherwise.

IV. IV. Actions Contrary to Applicable Laws and Regulations

Aras Kargo and its Subsidiaries comply with the laws and regulations of the countries in which they operate. Where the applicable requirements are unclear, they shall seek guidance from subject-matter experts. Any violation of applicable national or international laws and regulations, including but not limited to sanctions, anti-bribery and anti-corruption, prevention of money laundering and terrorist financing, competition law, and personal data protection, is not tolerated.

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B. B. Method and Process

The principal method for reporting Ethics Violation matters is the “Reporting Channel”. The Reporting Assessment Team and the Ethics Committee handle reports received through different channels with the same level of care and diligence. Access to the Reporting Channels is restricted exclusively to the Reporting Assessment Team.

Ethics Violation Reports may be submitted either by identifying the reporter or anonymously, at the Ethics Violation Reporter’s discretion; both types of reports are assessed with the same level of care and benefit from the same scope of protection. Aras Kargo ensures that the Reporting Channels are open, accessible and comprehensible to Employees and third parties and are operated in Turkish and English on a 24/7 basis. To ensure genuine anonymity, Aras Kargo operates an independent web-based reporting platform that does not identify the reporting person.

Matters submitted through the Reporting Channels are assessed and reported by the Reporting Assessment Team in accordance with the Code of Conduct and Ethics Assessment Procedure.

The assessment of an Ethics Violation Report shall be conducted within the following maximum periods:

- (i) Confirmation of receipt of the Ethics Violation Report shall be communicated to the Ethics Violation Reporter in accordance with the reporting method used;
- (ii) The preliminary assessment and the decision as to whether an investigation should be initiated shall be made by the Reporting Assessment Team within 15 (fifteen) business days where no further investigation or decision-making is required.
- (iii) As a rule, an investigation shall be completed within 60 (sixty) business days. This period may be extended by up to 30 (thirty) business days by decision of the Ethics Committee due to the complexity of the matter or difficulties in collecting evidence; the decision to extend the period shall be documented together with its reasons.

When making an Ethics Violation Report, the following information concerning the matter should be provided:

- • Location, department and city/district information where the incident occurred (branch, transfer centre, headquarters, regional office, etc.)
- • Detailed description
- • Information concerning the Employees and/or third parties involved in the incident (e.g. supplier)
- • Date or date range of the incident
- • Concrete evidence, if any (photographs, correspondence, etc.)

should be provided.

Where it is clearly and objectively established that Ethics Violation Reports have repeatedly been made in bad faith, a disciplinary investigation may be initiated against the Employee who made such reports on the grounds of non-compliance with the principle of integrity, without prejudice to the provisions of the Anti-Retaliation Policy.

C. C. Personal Data Protection:

Personal data processed in the course of Ethics Violation Reporting processes are processed in accordance with applicable legal requirements and within the framework of the Privacy Notice for Ethics Violation Reporting Processes published on the website. However, where lawfully requested by official institutions or authorities, such as the public prosecutor's office, courts or administrative authorities, unencrypted personal data may be required to be disclosed to the competent authorities. Further information on the protection of personal data is available in PL.HKK.01 Data Protection Policy on the Processing of Personal Data.

Persons who are the subject of an Ethics Violation Report are informed of the circumstances of the incident, the scope of the allegations made against them, and other persons potentially concerned by the report. While the aim is, as a general rule, to provide such information as soon as reasonably practicable, in certain circumstances such notification may be postponed for a period in the context of the investigation procedure. Further information on the investigation process is available in YN.DNT.01 Internal Audit Regulation.

Subject to the principle of confidentiality and anonymity of the Ethics Violation Report and the status of the investigation, persons concerned with the incident that is the subject of the Ethics Violation Report have the right to know the content of the report. However, they do not have the right to learn the identity of the person who made the Ethics Violation Report. The personal data of other persons named in the report, such as witnesses, shall also be kept confidential from the subject of the Ethics Violation Report.

5. 5. PRINCIPLES GOVERNING THE ASSESSMENT OF ETHICS VIOLATION REPORTS

a) Confidentiality and Anonymity:

The content of all Ethics Violation Reports and the information relating to the Ethics Violation Reporter shall be kept confidential. Unless otherwise stated by the Ethics Violation Reporter, anonymity shall be maintained in accordance with applicable legal requirements.

Members of the Reporting Assessment Team and the Ethics Committee, as well as all persons involved in the investigation process, shall sign a written confidentiality undertaking upon assuming their duties; such undertaking shall remain in force even after the relevant duties have ended. In the event of a breach of the confidentiality obligation, action shall be taken pursuant to the Disciplinary Regulation, without prejudice to the right to apply to judicial and administrative authorities depending on the nature of the breach.

Access to records contained in the Ethics Violation Reporting Assessment Register shall be restricted to authorised persons. Subject to statutory retention periods, such records shall be retained for a minimum of 10 (ten) years from the closure of the investigation and, upon expiry of this period, shall be destroyed in accordance with Law No. 6698 on the Protection of Personal Data and the relevant regulations.

Before responding to requests for information from competent judicial and administrative authorities, the written opinion of the Legal and Compliance Advisory shall be obtained; information disclosed shall be limited to the scope of the request, and a record of the disclosure shall be maintained. Where there is no legal impediment, the Ethics Violation Reporter shall be informed before their identity is disclosed.

b)b) Objectivity:

All Ethics Violation Reports shall be assessed objectively and impartially. The outcomes of Ethics Violation Reports shall be supported by reasonable and valid evidence.

c) c) Proportionality:

The principle of proportionality shall be taken into consideration when assessing Ethics Violation Reports. The scope of the assessment and any investigation initiated shall correspond to the scope of the suspicion and the evidence underlying such suspicion.

ç) d) Conflicts of Interest:

Before commencing the assessment of an Ethics Violation Report, all actual or potential conflicts of interest, if any (for example, direct or indirect relationships with the person under investigation or with the incident that is the subject of the report), shall be disclosed in detail. This principle shall be assessed within the scope of the Conflicts of Interest Policy.

d)e) Presumption of Innocence:

Any person who is a party to, or suspected of involvement in, an incident that is the subject of an Ethics Violation Report shall be presumed innocent until proven otherwise, and no sanction shall be imposed on such person.

a) Protection Against Retaliation:

All Employees who make an Ethics Violation Report in good faith, as well as Employees who testify, provide information or documents, or otherwise participate in an investigation, and their immediate family members, shall be protected against retaliation. The presumption of good faith shall apply; an allegation that an Ethics Violation Report was made in bad faith shall not be subject to any disciplinary process unless established by concrete and objective evidence. If an Ethics Violation Reporter believes that they have been subjected to retaliation, they shall report this through the Reporting Channels; such allegation shall be assessed independently of, and as a matter of priority to, the original Ethics Violation Report. The scope of protection against retaliation, burden of proof and applicable sanctions are set out in detail in PL.HKK.11 Anti-Retaliation Policy.

6. RECORD-KEEPING, REPORTING AND MONITORING:

All Ethics Violation Reports, regardless of the channel through which they are received, shall be entered by the Internal Audit Department into the Ethics Violation Reporting Assessment Register. The Reporting Assessment Team shall submit a quarterly report to the Ethics Committee containing the number of reports, distribution by subject matter, closure periods and a status summary. Twice a year, the Ethics Committee shall submit the annual Ethics Violation Reporting Report to the Audit Committee; the report shall include the number and trend of reports, distribution by subject category, average closure period, substantiation rate, number of retaliation complaints, measures taken, root cause analysis and recommendations for improvement.

7. TRAINING AND AWARENESS

All Employees shall receive training on this Policy and the reporting mechanism during onboarding and at least once a year. Training records shall be maintained by the Vice Presidency of Human and Culture, and the participation rate shall be included in the annual report. Members of the Reporting Assessment Team and the Ethics Committee shall be provided with opportunities to receive additional training on investigation techniques and confidentiality management.

8. AUTHORITY AND RESPONSIBILITIES

Under this Policy, Aras Kargo undertakes that it will not ignore any act or omission resulting in conduct contrary to the Code of Conduct and Ethics or any unlawful activity; that it will encourage persons exposed to or witnessing such conduct to make a report without hesitation; and that it is prepared and committed to activating all available support mechanisms when such allegations and reports arise, while also seeking to increase awareness under this Policy and prevent such incidents.

The Board of Directors is responsible for the ultimate oversight of the effectiveness of the reporting mechanism. It reviews the annual report and directly assesses reports concerning senior management.

Where there is a discrepancy between the applicable legislation and the practice defined in this Policy, the stricter of the provisions of the Policy or the applicable legislation shall apply, provided that the relevant practice does not constitute a violation of applicable law.

If you become aware of any conduct that you believe is contrary to applicable legislation or to the Aras Kargo Code of Conduct and Ethics and its subsidiary policies, please submit your report through Aras Kargo's Ethics Reporting Contact Details set out below.

All conduct alleged to be in breach of this Policy shall be addressed and investigated comprehensively and confidentially. However, the information of persons who make a report alleging a breach of this Policy shall not be disclosed to anyone unless otherwise requested, subject to legal obligations and the relevant provisions of Aras Kargo's internal policies.

9. FINAL PROVISIONS

This Policy shall be reviewed by the Compliance Department at least once a year or in the event of a material change in applicable legislation and shall be updated where necessary. Updates shall be communicated to all Employees in writing.

This Policy has been approved and brought into force by the Strategy Committee.

Aras Kargo Ethics Reporting Contact Details:

Rüzgarlıbahçe Mah. Yavuz Sultan Selim Cad.
No:2 Aras Plaza, Kavacık, Beykoz, ISTANBUL

bildirim@araskargo.com.tr

Ethics Panel: www.araskargo.com.tr

+90 (541)-667-44-45

6. DOCUMENTS**PR.DNT-01: Code of Conduct and Ethics**

YN.DNT.01: Internal Audit Regulation

PL.HKK.01: Data Protection Policy on the Processing of Personal Data**PL.HKK.11: Anti-Retaliation Policy****7. REVISION INFORMATION**

Revision No.:	Revision Details:
3	- The reporting method and process have been revised. - The Policy has been revised within the scope of the Anti-Retaliation Policy. - Record-keeping, reporting and monitoring processes have been added. - Training and awareness activities have been added. - The title of the Policy has been revised.