

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") and to the relevant managers 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 circumstances giving rise to reasonable suspicion, and to ensure that no retaliation is taken against persons making such reports.

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 (the "Employees").

2. 2. WHAT IS RETALIATION AND AN ETHICS VIOLATION?

Retaliation may be defined as any adverse conduct 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, 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.

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 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.

3. GENERAL PRINCIPLES

3. As one of Türkiye's leading postal service providers, Aras Kargo aims to operate in accordance with the highest standards of ethical conduct and integrity. Under this Policy, Aras Kargo aims to prevent persons making Ethics Violation Reports from suffering any detriment and to foster trust by ensuring continuity of communication between Employees and the Reporting Channels.

Aras Kargo undertakes that persons who make an Ethics Violation Report honestly and in good faith and/or seek information regarding the Code of Conduct and Ethics will not be subjected to retaliation. Accordingly, Aras Kargo

guarantees that Ethics Violation Reporters will not suffer any detriment as a result of reporting non-compliance with applicable laws and regulations, the Code of Conduct and Ethics, or internal regulations.

Ethics Violation Reports may be submitted to the Reporting Channels either anonymously or by identifying the reporter. The identities of persons making Ethics Violation Reports through the Reporting Channels shall be kept strictly confidential unless otherwise requested by the reporter. Where an Ethics Violation Reporter requests disclosure of their information, it shall nevertheless be unacceptable for that person to be subjected, for any reason or without any stated reason, to conduct that constitutes or may constitute retaliation.

Anonymous reports shall be assessed with the same degree of seriousness and care as identified reports. The Reporting Channels are accessible 24/7 and provide services in Turkish and English.

All information and documentation relating to the Ethics Violation Reporting process shall be protected in accordance with the highest standards of confidentiality. The identity of the Ethics Violation Reporter, the content of the Ethics Violation Report and other data relating to the process may only be accessed by members of the Ethics Committee and designated investigators on a “need-to-know” basis. Ethics Violation Report records are stored in a separate system protected against unauthorised access, encrypted and subject to access logging. The processing of personal data is carried out in accordance with the Privacy Notice for Ethics Violation Reporting Processes prepared pursuant to Law No. 6698 on the Protection of Personal Data and the Aras Kargo Personal Data Protection and Processing Policy.

The confidentiality obligation may be limited only in the following circumstances: (i) a final and binding decision of a judicial authority; (ii) a lawful written request from the public prosecutor’s office or an authorised regulatory or supervisory authority; or (iii) the express written consent of the Ethics Violation Reporter. Even in such circumstances, only the information specifically requested shall be disclosed and, to the extent reasonably possible, the Ethics Violation Reporter shall be informed in advance. Employees who breach the confidentiality obligation shall be subject to disciplinary proceedings depending on the nature and consequences of the breach; sanctions up to and including termination of employment may be imposed.

If an Employee believes that, after making an Ethics Violation Report, they have been subjected to conduct that may constitute retaliation, or if they witness retaliation against another Employee, they shall report the matter to their managers or through the Reporting Channels as soon as possible, either orally or in writing.

A person who believes that they have been subjected to retaliation, or who witnesses retaliation against another Employee, may submit the matter through the Reporting Channels. Where retaliation is alleged to have originated directly from the person’s manager, the Ethics Violation Report shall be received and assessed exclusively through a channel other than that manager.

The fact that an Ethics Violation Report subsequently proves to be unfounded or unverifiable shall not, in itself, constitute evidence of bad faith. Unless the Ethics Violation Reporter’s bad faith is established by clear and objective evidence, the

Ethics Violation Reporter shall be presumed to have acted in good faith and shall continue to benefit from the protection afforded under this Policy. Employees found to have engaged in retaliation shall be subject to the disciplinary sanctions set out in the Disciplinary Regulation, including termination of employment for just cause, depending on the nature and consequences of the conduct. If the retaliatory conduct also constitutes a criminal offence, the necessary judicial proceedings shall be initiated. The protections set out in this Article apply to Employees.

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 this Anti-Retaliation Policy.

4. AUTHORITY AND RESPONSIBILITIES

4. Under this Policy, Aras Kargo undertakes that it will not ignore any act or omission resulting in retaliation; that it will encourage persons exposed to or witnessing such conduct to make a report without hesitation; that it will endeavour to increase awareness under this Policy and prevent such incidents; and that it is prepared and committed to activating all available support mechanisms when such allegations and reports arise.

Any conduct in breach of this Policy shall be investigated with the utmost confidentiality and seriousness in accordance with the procedures established by Aras Kargo, and disciplinary proceedings shall be initiated as appropriate. Where there is a discrepancy between applicable legislation and the practice defined in this Policy, the stricter of the provisions of the Policy or applicable legislation shall apply, provided that the relevant practice does not constitute a violation of applicable law.

The Aras Kargo Board of Directors is responsible for the effective implementation of this Policy. The Board of Directors undertakes to adopt a zero-tolerance approach to retaliation, provide the resources necessary to keep the Reporting Channels operational, and safeguard the independence of the Ethics Committee.

The Ethics Committee is composed of the Vice President responsible for Human & Culture, Audit, Legal & Compliance, the Internal Control, Corporate Risk Management and Compliance Counsel, and the Internal Audit Manager. The Reporting Assessment Team is composed of the Internal Control, Corporate Risk Management and Compliance Counsel and the Internal Audit Manager. The Ethics Committee and the Reporting Assessment Team handle Ethics Violation Reports as set out in the Procedure for the Assessment of Code of Conduct and Ethics Violations.

Where an Ethics Violation Report directly or indirectly concerns a member of the Ethics Committee, or concerns an Employee who reports directly to any member of the Ethics Committee, the relevant member shall recuse themselves from the assessment of that case.

The person against whom an Ethics Violation Report has been made shall be informed only of the substance of the allegation, without disclosure of the Ethics Violation Reporter's identity, and shall be granted a reasonable period to

submit a written defence; no decision shall be made before the defence is obtained. The Ethics Committee shall assess the investigation findings and conclude the Ethics Violation Report as follows: (i) allegations substantiated; (ii) excluded from assessment; or (iii) no supporting evidence found. Where deemed necessary, the Ethics Committee shall ensure that the investigation findings are referred to the Disciplinary Committee.

All Ethics Violation Reports shall be recorded in a form maintained by the Internal Audit Department, containing the report number, tracking code, date and channel of receipt, type and subject matter, whether the report is anonymous, investigation status, process stages and dates, decision date and outcome. Records containing personal data shall be kept separately from anonymised statistical records and retained for a minimum of 10 years following the conclusion of the process.

The effectiveness of this Policy shall be measured based on the total number of Ethics Violation Reports, the ratio of anonymous to identified reports, the subject matter of Ethics Violation Reports, the rate of substantiated Ethics Violation Reports, and whether the Ethics Violation Reporter is on Aras Kargo's payroll. Every six months, the Ethics Committee shall report in writing to the Audit Committee on its decisions, recommendations, remedial interventions, and activities undertaken to promote the Code of Conduct and Ethics. The summary report containing anonymised statistics submitted to the Audit Committee shall not contain any information identifying the Reporters.

All Employees shall receive orientation training on this Policy and the Ethics Violation Reporting processes upon commencement of employment; refresher training shall be provided to existing Employees at least once a year. Detailed additional training shall be provided to managers and Employees working in high-risk positions; training attendance records shall be maintained by the Human & Culture Department. Agency employees and business partners are required, pursuant to their contracts, to comply with this Policy and may use the same Reporting Channels as Aras Kargo Employees.

This Policy shall be reviewed at least once a year by the Legal and Compliance Advisory and updated in light of changes in legislation, revisions to the ISO 37001 standard, audit findings, or lessons learned from Ethics Violation Reports. Updates shall be communicated to all Employees and the necessary training shall be renewed.

If you become aware of any conduct that you believe is contrary to this Policy, applicable legislation, or the Aras Kargo Code of Conduct and Ethics, please submit your Ethics Violation 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 making an Ethics Violation Report concerning an alleged 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.

5. 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.

Bu politika yılda en az bir kez veya yasal mevzuatta önemli değişiklik olması halinde Uyum Birimi tarafından gözden geçirilir ve gerektiğinde güncellenir. Güncellemeler, tüm çalışanlara yazılı olarak duyurulur.

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

Aras Kargo Ethics Reporting Contact Details:

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5. DOKÜMANLAR

5. DOCUMENTS

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

Revision No.:	Revision Details:
2	- General Principles and Authority and Responsibilities have been reviewed. - Information concerning the reporting processes has been added.

6. REVISION INFORMATION