



OUR CODE OF CONDUCT AND ETHICS





Dear Colleagues,

As one of Türkiye's leading parcel delivery companies, Aras Kargo has a responsibility towards society. We are committed to acting in line with this responsibility. We therefore always expect the very best of ourselves. This approach concerns each and every one of us. We want to ensure that our actions are impeccable and exemplary at all times.

Our employees form the basis of the success and quality of our business. Their conduct is also one of the key factors shaping Aras Kargo's public image. Every employee contributes to this through their personality, performance and conduct.

Accordingly, in line with our mission statement, we have updated our Code of Conduct and Ethics and present it to all our employees. The Code applies, without exception, to all employees of Aras Kargo and its Affiliates.

Our Code of Conduct and Ethics sets out the principles governing our conduct at Aras Kargo and provides a framework for compliance. Detailed instructions are set out in our compliance policies. It forms the basis of an open, appreciative and legally compliant corporate culture to which we are committed and which we bring to life every day.

Our standards in business are to provide our customers with the best possible quality and to treat our business partners fairly. We want to be perceived as a trustworthy partner by our customers, shareholders, business partners and employees, as well as by authorities, institutions and the general public.

Barbara HAGEN
CEO
Member of the Board of
Directors

Andreas THÖNI
COO
Member of the Board of
Directors

Ramazan ALTINAY
CCO
Chief Commercial
Officer

Affiliate Company/Affiliate(s): Companies controlled by Aras Kargo.

What is the Code of Conduct and Ethics?

Our Code of Conduct and Ethics is based on our mission statement and is binding on all members of the Board of Directors, executives, employees, temporary staff and all business units of Aras Kargo. Our policies, procedures and instructions are derived from the Code of Conduct and Ethics, and everyone within Aras Kargo and its Affiliates must comply with them.

The Code of Conduct and Ethics is available at www.araskargo.com.tr. We want to achieve our goals and act in a legally compliant, sincere and honest manner. The Code therefore sets out the rules required for all employees of Aras Kargo and its Affiliate Companies to act and make decisions in an ethically and legally impeccable manner.

This Code is based on international agreements and ethical standards and, in particular, reflects our commitment to the United Nations Global Compact, the UN Sustainable Development Goals, the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises and the ILO Declaration on Fundamental Principles and Rights at Work.

In all our actions and decisions, we undertake to comply with the legislation in force in the jurisdictions in which we operate, as well as with applicable internal policies, procedures and guidelines. If any review reveals that local, regional or international particularities differ from the Company's guidelines and rules of conduct, Aras Kargo Compliance shall be informed.

We likewise expect our business partners to act in accordance with the principles set out in this Code.

How do I use the Code of Conduct and Ethics?

In business life, situations may arise in which the correct and appropriate course of action is not immediately clear. In such cases, you should ask yourself the following questions:

- Is my action or decision permitted by law?
- Does it correspond to our values, the principles set out in the Code of Conduct and Ethics, and our internal policies and practices?
- Is it free of personal interests and focused on the interests of the Company?
- Do I feel that my action or decision is appropriate?
- Will my action or decision stand up to public scrutiny, for example by public authorities?
- Does my action or decision protect the reputation of Aras Kargo and our main shareholder, Austrian Post, as companies with high ethical standards?
- Is my action or decision in the interest of our corporate culture?

If you can answer 'Yes' to all of these questions, your action or decision is most likely correct and consistent with the principles set out below. If in doubt, please consult your manager and/or Compliance.

OUR CODE: We are committed to acting in compliance with all applicable legal provisions and the Company's internal rules and standards applicable throughout the Group.

How does the Code of Conduct and Ethics protect me?

The Code of Conduct and Ethics contains guidelines and principles for creating value and acting in compliance with the law in everyday business. Compliance with these guidelines and principles protects you personally as well as our Company. Managers have a special role-model function in this regard.

Should you become aware of a violation of the law or the Code of Conduct and Ethics, please inform your manager or Compliance by telephone at (541) 667 44 45, by e-mail at bildirim@araskargo.com.tr, or through the ethics panel available at www.araskargo.com.tr. Information provided by responsible, honest and prudent employees is one of the most effective ways of resolving misconduct within companies. In this way, you protect our Company, our Affiliates and the Group

against significant harm and help them to improve continuously.

Everybody may report a violation or suspected violation of the law, this Code or internal policies.

Reports may be submitted in your name or anonymously. All reports will be treated as strictly confidential.

If you believe the information you have provided is correct and have submitted it in good faith, you need not fear any direct or indirect retaliation or disadvantage, even if your concerns prove to be unfounded.

Information will be kept strictly confidential and will be investigated and reviewed by persons bound by confidentiality..

What are the consequences of non-compliance with the Code of Conduct and Ethics?

Non-compliance with the principles set out in the Code may harm our Company's reputation and competitiveness and may therefore result in disciplinary measures or consequences under employment and labour law.

Group: The term 'Group' includes all companies in which Austrian Post directly or indirectly holds an interest of at least 50% or which it otherwise controls. The Code of Conduct and Ethics is communicated to all other companies in which Austrian Post directly or indirectly holds an interest of at least 25%, and they are requested to recognise it independently within their decision-making structures under company law.

OUR CODE: We do not tolerate inappropriate conduct.



We all adhere to **OUR VALUES** and our Code of Conduct and Ethics

The Board of Directors bears ultimate responsibility for the uniform application of our Code of Conduct and Ethics within the Company.

All managerial staff, including the managers responsible for our Affiliates, are responsible for its application and compliance within their respective areas of responsibility.

WE ARE RED: Red is Aras Kargo's corporate colour and represents our commitment to and courage in upholding our ethical values.

We FOCUS on our customers.

1. Customer Orientation

OUR CODE: We act with a customer-focused approach and aim to continuously improve ourselves.

Our closest relationship is with our customers. This drives us to establish connections every day and improve continuously. Whether digitally or in person, we always conduct our relationships with customers in a practical and sustainable manner. This is our mission. We always support our customers and treat them as we would like to be treated ourselves—namely, in a friendly, helpful, competent and solution-oriented manner. Our uniform gives us a clear, unique and appealing appearance. We serve as brand ambassadors for our Company.

We set the benchmark for quality and customer orientation. We take criticism from our customers seriously and see it as an incentive to improve. We use our strengths for the benefit of our customers, including across national borders.

We give our customers a clear performance promise and strive to keep it at all times. We design our products and services to be customer-centric, simple and easy to understand.

2. A Future-Oriented Approach

OUR CODE: We operate cost-effectively in our business and take a forward-looking approach.

We are much more than a parcel delivery service. As one of the leading parcel delivery companies, we successfully bring people and markets together with the world of tomorrow. This is our vision. We are forward-looking in our work and aim to secure our market position. We act cost-effectively and contribute jointly to the Company's success. We think in the long term and make provisions for economically challenging situations.

Together with our main shareholder, we safeguard our Group's future as an important economic actor in Europe and internationally. We secure our market position through purposeful ideas, innovation and our unique corporate culture. We use new technologies and the diverse skills of our employees to create added



value. In the process, we consciously promote the development of a wide range of sustainable products and services to meet the differing needs of our customers in both business and private customer segments.

3. Fair Competition

OUR CODE: We reject anti-competitive conduct.

We reject anti-competitive behaviour. We act fairly and transparently and undertake to comply with competition rules and antitrust laws. We reject conduct that restricts competition, such as price fixing, abuse of a market position and unfair business practices.

We counter the challenges posed by growing competition by improving our processes and capabilities, developing new products and continuously increasing our efficiency.

4. Capital Market

OUR CODE: We act as a trustworthy player in the capital market.

Because our main shareholder, Austrian Post, is a publicly listed company, we must meet the strict requirements applicable to capital-market participants. It is self-evident that our financial reports must be prepared and disclosed correctly. We comply with the relevant statutory provisions and maintain open and transparent communication with shareholders, investors and analysts to protect the Company and its reputation. We are also committed to the principle of equal treatment of shareholders under equal conditions. We are aware that the misuse of insider information ('insider trading') is prohibited by law and may be punished by the courts.

5. Protection of Personal Data

OUR CODE: We process personal data in compliance with legal requirements.

We use the personal data of natural or legal persons in accordance with applicable statutory requirements and the employer's explicit instructions. In particular, we comply with authorisation concepts, process personal data only within the scope of our business activities, and copy, collect, transmit,



download or store such data in compliance with the law. If you have any questions, please contact your business unit's data protection officer or our Company's Data Protection Organisation at kisiselveri@araskargo.com.tr or veri.koruma@araskargo.com.tr. We immediately report any data privacy incident giving rise to a suspected breach to our Data Protection Centre. We use internal forms to submit such reports or inform the data protection officer.

6. Cooperation with the Authorities

OUR CODE: We cooperate in our interactions with public authorities.

We undertake to provide complete, fair, accurate and easily comprehensible data to supervisory authorities in a timely manner within the framework of applicable requirements. We foster open, transparent and cooperative dealings with the supervisory and regulatory authorities relevant to Aras Kargo and its Affiliates. We aim to ensure secure and stable relationships between Aras Kargo, its Affiliate Companies and the competent authorities.

7. Transparency

OUR CODE: We act with integrity, respectability and reliability.

This is how we want to be perceived by our customers, shareholders, business partners and employees, as well as by institutions and the general public.

Our decisions are independent and uninfluenced by others. They are based on complete and transparent information. Comprehensive documentation is therefore important to us.

8. Accounting and Reporting

OUR CODE: We perform accounting and reporting activities with the utmost care.

We are firmly committed to our social responsibility with regard to proper accounting and bookkeeping and the fulfilment of our tax and social security obligations. At Aras Kargo and its Affiliate Companies, accounting and financial data, as well as security and personal data, are treated as strictly confidential. Accounting and financial data are treated as strictly confidential within the Austrian Post Group companies. All business transactions are recorded in our

accounts. This is done in accordance with strictly defined procedures and auditing principles, as well as generally accepted accounting principles, to ensure that records are accurate.

9. Protection of Business and Trade Secrets

OUR CODE: We keep business and corporate data confidential.

We treat information that is not already publicly available as confidential and do not disclose it to unauthorised third parties. This includes financial information, business data, operational data, customer information and employee information.

It also includes information relating to the business, operations and future strategies of Aras Kargo, its Affiliate Companies and our main shareholder, Austrian Post.

We keep data used in data processing confidential unless there are legally permissible grounds for its disclosure. Intellectual property is a valuable asset that must be protected against unauthorised use and includes copyrights, trademarks and patent rights.

10. Information Security

OUR CODE: We use information, data and systems carefully and responsibly.

The security of all information is an important prerequisite and a fundamental aspect of the efficient and smooth running of business processes. It has a strong bearing on our relationships with customers and business partners.

Owing to technological developments and the ever-increasing importance of data for the successful development of the Company, Aras Kargo takes comprehensive measures to guarantee the confidentiality of customer, employee and Company data, as well as the integrity and availability of the IT systems we operate.

The proper and careful handling of IT resources is necessary to protect against cybercrime and data loss. Every employee is therefore responsible for handling information, data and systems carefully and responsibly.



Our goal is to become the industry's **first-choice company** in a sustainable manner.

We act in a cost-effective manner and make a personal contribution to the company's success.

WE ARE GREEN: Through our sustainable business model, we invest in the well-being of our employees, the environment and society in a forward-looking and proactive manner.

1. Environment and Climate

OUR CODE: Our activities combine environmental and climate protection with cost-effectiveness.

Through our logistics solutions, we connect people, regions and countries, create business opportunities and generate added value. At the same time, our business activities have an impact on the environment and climate, particularly through emissions of climate-changing greenhouse gases such as carbon dioxide.

As a logistics group, we have a greater responsibility to play an active role in achieving national and international climate targets.

We all contribute to reducing climate-impacting greenhouse gases and actively support measures to protect the environment and climate. We do not waste resources and actively participate in reducing burdens on the environment and climate. In developing and using our products, we always comply with all environmental and climate laws, regulations and standards.

2. Corruption

OUR CODE: We do not tolerate corruption in any form.

We do not tolerate corruption in any form. We strictly avoid anything that appears improper or dishonest. We make business decisions objectively and solely in the interests of Aras Kargo. Private interests play no role in our decisions. We do not accept any form of improper benefit and, in particular, do not allow such benefits to influence our business decisions. Demanding a benefit is prohibited without exception. There are no exceptions to this rule. When dealing with third parties, offering, promising or providing improper benefits, directly or indirectly, is prohibited without exception.

3. Gifts and Invitations

OUR CODE: We avoid conflicts of interest.

Regional business practices may permit the giving and receiving of reasonable gifts and the acceptance of invitations. However, demanding, promising, accepting or giving gifts, invitations or other benefits that may improperly



influence an existing or future business relationship, or create such an impression, is always prohibited. An exception applies to the acceptance of low-value gifts, invitations or similar benefits that do not exceed the specified limits.

4. Donations and Sponsorships

OUR CODE: We adhere to our values and principles.

Donations and sponsorships must be consistent with the values and principles set out in this Code of Conduct and Ethics and must not be used to circumvent our internal policies.

5. Avoidance of Conflicts of Interest

OUR CODE: We always act in the best interests of the Company. We disclose potential conflicts of interest even if we are not asked to do so.

We always act in the Company's interests. We conduct ourselves in a way that avoids any conflict of interest that could adversely affect our Company. We avoid situations in which personal or financial interests conflict, or could conflict, with the interests of the Company. We disclose potential conflicts of interest fully and without being asked, including family ties, business relationships or investments involving persons or companies with which the Group does business.

Conflicts of interest may also arise from secondary employment. Human & Culture must always be notified of any secondary employment.

6. International Sanctions

OUR CODE: We comply with national and international export and trade restrictions.

As an internationally active company, Aras Kargo attaches great importance to national and international export and trade restrictions in order to operate sustainably. Accordingly, Aras Kargo complies with embargoes, customs regulations and export control rules applicable to specific countries, companies or individuals and carries out the relevant checks.

Companies forming part of the Group do not conduct business with sanctioned companies or individuals.

7. Money Laundering

OUR CODE: We categorically reject any business involving proceeds of crime.

We do not tolerate money laundering in any form. Accordingly, we closely monitor financial transactions that may be intended to conceal criminal assets within otherwise lawful transactions.

Aras Kargo does not tolerate violations of applicable laws or of provisions aimed at combating money laundering and terrorist financing.

We categorically reject transactions involving criminal assets.

8. Use of Company Property

OUR CODE: We use Company property properly and with due care.

We use the resources provided to us for business purposes, such as buildings, fixtures, equipment and supplies, properly and carefully. We do not use Company property for personal purposes or for tasks that do not serve the Company's business purposes.

Contractually permitted private use of Company property, such as Company cars, is excluded from this rule.

9. Procurement

OUR CODE: Our procurement activities are based on the principles of cost-effectiveness, sustainability and integrity.

Cost efficiency, sustainability and integrity are the fundamental criteria for our procurement activities. We are conscious of our role in the supply chain and assume responsibility throughout the entire value chain. Accordingly, we expect our direct and indirect suppliers to comply with the principles set out in our Contractor Code of Conduct.

We carry out our procurement activities in accordance with applicable statutory provisions and internal Company guidelines.

10. Working Conditions

OUR CODE: We comply with nationally applicable labour laws and regulations. A respectful working environment is of utmost importance to us.

We reject discrimination in any form. We do not tolerate working conditions that are inconsistent with international or national laws and regulations, and we expect the same from our direct and indirect business partners. Child labour and forced labour, as defined by ILO and United Nations conventions or national legislation, are prohibited at Aras Kargo and all our Affiliate Companies.

We ensure safe working conditions at Aras Kargo and its Affiliate Companies. We do not permit discrimination of any kind within the Group, including discrimination based on characteristics not currently protected by law. Our zero-tolerance policy towards discrimination is the foundation of a respectful working environment in which every employee feels safe and accepted.

Accordingly, all employees are entitled to fair and performance-based remuneration. We respect the rights to freedom of association and collective bargaining in accordance with applicable laws and regulations.

11. Health and Safety

OUR CODE: We care deeply about the health and safety of our employees.

We attach great importance to compliance with statutory and internal regulations intended to protect our employees, because the well-being of our employees is a high priority for our Company.

The health and safety of our employees is particularly important to us. We therefore actively promote health within our Company and implement preventive measures to protect our employees' health and fitness for long-term employment.

WE EMBRACE ALL COLOURS / WE ARE ALL ARAS

The diversity of our teams is just as important to our success as the diversity of our products and services and our international commitments.

1. Diversity

OUR CODE: We promote and respect diversity.

Diversity is a decisive competitive advantage for our business success. It is therefore regarded as part of our integrated Group strategy and as a central guiding principle in our management and corporate culture. This means that we respect the diversity of our employees, customers and stakeholders, actively incorporate it into the development of our processes and services, and promote it within our workforce.

Our Group brings together people of diverse genders and sexual orientations, religions and beliefs, age groups, mental and physical abilities, and ethnic and social backgrounds, who bring different perspectives, skills and experiences.

Our employees and managers are expected to foster an inclusive working environment in which people with different lives and backgrounds feel that they belong.

2. Equal opportunities

OUR CODE: We do not tolerate discrimination in any form.

Aras Kargo seeks to contribute to promoting equal opportunities in society and endeavours to ensure the right conditions for our employees and customers.

We do not tolerate discrimination in any form, particularly on the grounds of gender, age, ethnic origin, skin colour, mental or physical disability, religion, belief or sexual orientation.

We create the general conditions needed to facilitate equal opportunities, including further development, career advancement and a successful work-life balance. We also provide an environment that promotes the unique development and growth of each employee.

We ensure equal opportunities for our customers by identifying and understanding the differing needs of customer groups and consciously incorporating them into the design and further development of our products and services.

3. Team Spirit without Borders

OUR CODE: We benefit from international cooperation.

International borders and distances are no barrier to our daily interactions. On the contrary, they enable us to benefit from the different experiences of our employees, customers and individual markets.

As part of an internationally active postal group, cooperation with and respect for different ethnic origins and cultural groups form one of the most important foundations of our shared success.

We regard the different languages, skills and lifestyles of our employees as a resource that enables us to grow as an international group, learn from one another and develop new ideas.

4. Innovation

OUR CODE: We promote innovation as an integral part of our business.

We regard innovation as a fundamental element that is critical to the success of our business and emphasise it across all areas of our strategy. Innovation at the level of business processes, products, services and business models is an integral part of Aras Kargo's future.

By incorporating the diversity of our customers and stakeholders into the design of all our processes and actively using our employees' different experiences and perspectives as a valuable resource, we develop and provide innovative solutions for all markets and everyone.



5. Openness, Respect and Appreciation

OUR CODE: Openness, appreciation and respect form the foundation of our daily work.

We interact with one another openly and respectfully. We treat one another with respect and acceptance and do not tolerate degrading behaviour towards others. This applies not only to our interactions with employees, but also to our interactions with customers, partners and others. We give one another direct feedback and offer constructive criticism. We never make matters personal.

We resolve differences of opinion within the Group, do not disclose information externally and always strive to create a positive image of our Group. We collectively stand behind decisions that have been made and work together to implement them. Managers serve as role models both personally and professionally. We are open to our employees' concerns and feedback, because it is important to our Company's success that every individual is able to express their views.

6. Communication

OUR CODE: We encourage clear and open communication.

As part of strategic topic management, the departments responsible for communication must be informed as early as possible during the preparatory stages of projects, product changes and strategic planning. We aim to ensure a consistent and coordinated image across the Company, both internally and externally. We comply with internal policies governing contact with the media, political groups, interest groups and investors.

If you have any questions or suggestions, please contact Compliance. They will be pleased to assist you.

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Aras Kargo Compliance

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

Ask questions - understand the rules

Compliance Advice

uyum@araskargo.com.tr

Identify misconduct - choose to act with integrity

Ethics Reporting Contact Details

bildirim@araskargo.com.tr

Aras Kargo Ethics Hotline: +90 (541)-667-44-45

Ethics Panel

<https://www.araskargo.com.tr/etik-ihlali-formu>

Austrian Post Compliance Office

Compliance Office, Rochusplatz 1,
1030 Vienna, Austria

compliance.helpdesk@post.at

Austrian Hotline: 0800 20 22 24

International Hotline: 00800 20 22 24 26

