

1. PURPOSE AND SCOPE

Purpose: This Policy is intended to encourage the reporting of violations of the policies concerning the Code of Conduct and Ethics, national and international regulations to which we are subject and suspicious situations both to Aras Kargo Ethics Reporting Communication Reporting Channels (“**Reporting Reporting Channels**”) and relevant managers (“**Reporting(s)**”), without any concern and to prevent individuals making a reporting, against retaliation which may be suffered thereby.

Scope: This Policy, which constitutes an integral part of Aras Kargo’s Code of Conduct, applies to Aras Kargo Yurt İçi Yurt Dışı Taşımacılık A.Ş (“**Aras Kargo**”) and all of its affiliates over which it has control (“**Affiliates**”) and sub-employer’s personnel, directors, officers, agency employees (“**Employees**”).

2. WHAT IS RETALIATION?

Retaliation refers to any negative (re)action towards any individual reporting an inappropriate conduct concerning the Code of Conduct and Ethics or any national or international regulation to the Reporting Reporting Channels or managers, including but not limited to any exclusion, harassment, discrimination, threat, loss of rights, demotion, prevention of promotion, restriction of career opportunities, change of position, negative performance review.

3. GENERAL PRINCIPLES

Aras Kargo, which is one of the pioneering postal service providers in Turkey, aims to act in accordance with the highest standards of ethical conduct and integrity/honesty. With this Policy, it is intended to prevent the individuals who submit a Reporting from suffering any harm and to establish trust by ensuring a continuous communication between the Employees and the Reporting Reporting Channels.

Aras Kargo undertakes that individuals, who honestly and in good faith, report an inappropriate conduct and/or suspicion of inappropriate conduct and/or seek information on the Code of Conduct and Ethics shall not suffer retaliation. From this perspective, Aras Kargo guarantees that the individuals reporting any conduct contrary to the legal regulations, Code of Conduct and Ethics, domestic legislation and raising grievance in relation thereto shall not suffer any harm therefore.

Reporting may be submitted anonymously or by name to the Reporting Channels, and the identities of the individuals submitting an Reporting to the Reporting Reporting Channels shall be kept in strict confidence, unless otherwise requested. If the individual making a reporting requests the disclosure of his/her identity, it is unacceptable for such individual to be exposed to behaviour which is or which may be defined as retaliation, for any reason or without justification.

If an Employee considers that (s)he is exposed to any behaviour which may be defined as retaliation against him/her after submitting a Reporting or witnesses any retaliation against another Employee, such Employee should report the situation, verbally or in writing, to his/her managers or any Reporting Line, within the shortest time.

4. POWERS AND RESPONSIBILITIES

Aras Kargo undertakes, with this Policy, that it shall not disregard any active or passive conduct resulting in any form of retaliation; that it shall encourage those who experience or witness such conduct to report them without any hesitation or fear; that it shall spare efforts to raise awareness and to prevent such incidents within the scope of this Policy; and that it is ready and adamant to operate all support mechanisms when such allegations or applications are at issue.

Any and all alleged violations of this Policy shall be investigated in the strictest confidentiality and solemnly, according to the procedures laid down by Aras Kargo, and the disciplinary processes shall be conducted accordingly.

In case of any discrepancy between the legislation and the practice defined in this Policy, the more stringent provisions in the legislation or the Policy, to the extent that the practice concerned is not contrary to the legislation, shall prevail.

If you become aware of any conduct which you consider to be contrary to this Policy, applicable laws or Aras Kargo's Code of Conduct and Ethics, please make a reporting via the Aras Kargo's Ethics Reporting Communication Channels as provided below.

All alleged violations of this Policy shall be handled and investigated thoroughly and as confidential. In addition, the individuals reporting any alleged violation of this Policy shall be kept anonymous, unless otherwise requested, without prejudice to legal obligations and the relevant regulations in Aras Kargo's internal policies.

Aras Kargo Ethics Reporting Communication Channels:

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5. DOCUMENTS

PR.DNT-01: Code of Conduct and Ethics