

1. PURPOSE AND SCOPE

Purpose: This policy is intended to set out the procedures and principles for preventing any assault and harassment including sexual assault and sexual harassment based on discrimination for sex, sexual orientation, gender, gender identity or any other ground or based on any other reason and ensuring the maintenance of a working environment in this regard.

Scope: This Policy, which constitutes an integral part of Aras Kargo's Code of Conduct and Ethics, 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 all of its and sub-employer's personnel, directors, officers, agency employees and/ or representatives ("Employees"), advisors/consultants, service/product suppliers, contracted lawyers, and any representatives act in the name and on behalf of Aras Kargo. Aras Kargo and Affiliates and its business partners are expected to comply with this Policy.

2. 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.

Aras Kargo undertakes to carry out its operations pursuant to the United Nations Global Compact, which is the world's largest corporate sustainability initiative, and to which Aras Kargo is a signatory, in order to develop all its activities in accordance with ethical values and corporate responsibility whilst pursuing its objectives, and to procure a positive and safe working environment for its Employees, in every respect, in order to materialize the purpose of this Policy.

I. **The Prevention of Discrimination on All Grounds**

Aras Kargo does not tolerate discrimination and bias between genders or differences or specific to sexual orientation, in accordance with "the elimination of discrimination in respect of employment and occupation" principle of the Ten Principles of the UN Global Compact, and raises awareness thereon by organizing regular trainings in this regard.

Discrimination refers to unequal treatment of any individual in the society, based on his/her innate or acquired characteristics. Aras Kargo disapproves all kinds of direct, indirect or systematic discrimination.

Aras Kargo undertakes, in accordance with article 5 of the Labour Code No. 4857 with the heading of "Principle of Equal Treatment", that there shall be "i) no discrimination based on language, race, colour, sex, disability, political opinion, philosophical belief, religion, sect or similar reasons; ii) no discrimination between a full-time and a part-time Employee or an Employee working under a fixed-term employment contract (contract made for a definite period) and an Employee working under an open-ended employment contract (contract made for an indefinite period); iii) except for biological reasons or reasons related to the nature of the job, no discrimination, either directly or indirectly, against an Employee in the execution, conditions, implementation, and termination of his/her employment contract due to the Employee's sex or maternity; iv) no differential remuneration for similar jobs or for work of equal value; v) no justification for the payment of a lower wage in consequence of the application of special protective provisions due to the Employee's sex." Aras Kargo is scrupulous about offering equal rights and opportunities to its Employees, and ensuring an equal and just working environment. Aras Kargo expects that its Employees show the same sensitivity towards each other.

II. Ensuring Gender Equality

Gender inequality connotes the gender-based inequality between women and men, in areas such as education, healthcare, recruitment, family life and social status. On the other hand, gender equality implies ensuring that the individuals have equal rights, irrespective of their biological or social gender, and fair and just treatment and non-discrimination in terms of social gender.

In this regard, Aras Kargo undertakes to be a responsible employer in relation to changing and equalizing social roles cast for genders, and to opposing social gender inequality in every field.

III. The Prevention of any Form of Violence, Harassment and Assault

Aras Kargo undertakes to adopt any and all measures required to prevent any form of psychological, sexual, verbal or emotional harassment and bullying, violence, abuse and threat, and ensure labour peace at all levels in the workplace.

Within this framework, it is crucial that the necessary investigation and examination methods which shall not put the parties in a more difficult position, whether financially and emotionally, are established, in order to handle any incident of harassment or violence in an unbiased manner.

- i. **Violence** refers to various actions such as inflicting physical, sexual, psychological, digital, or economic harm and suffering, making threats, coercion, or unlawfully restricting freedom. Violence and harassment may occur not only in the physical workplace but also in private and/or public spaces, as well as in work-related events and activities.
- ii. **Sexual Harassment** refers to unconsented/unwelcome sexual advances, without any physical contact, which violate an individual's sexual freedom and which occur verbally, through body language and all kinds of communication tools.

Examples of sexual harassment include but are not limited to: the use of work-related threats or rewards for sexual favours; remarks about any employee' appearance, age, private life etc.; sexual comments, stories and jokes; repeated and unwelcome social meeting or physical intimacy invites; gender-based insults against the employee; physical following/stalking; sending sexual messages and requests by using communication tools; showing sexual or obscene materials; making passes; unconsented audio or visual recording and other recording; asking questions or gossiping about one's sexual life.

- iii. **Sexual Assault** is violating any individual's bodily integrity with unconsented sexual conduct.

Examples of sexual assault include but are not limited to: hugging, caressing, touching, tweaking on the cheek, kissing, holding a hand, stroking hair and violation of bodily integrity with a sexual organ or any other object.

Anyone can be a victim of sexual harassment or assault, irrespective of the gender of the victim or the harasser. Aras Kargo acknowledges that sexual harassment or assault is independent of gender. The important matter is that the sexual conduct is unwanted and unwelcome by the harassed or assaulted person.

Aras Kargo shall implement a zero-tolerance policy against any form of sexual harassment, violence or assault, handle all

incidents seriously, and promptly investigate of allegations of sexual harassment. Any Employee who is identified to have sexually harassed another person may be subject to disciplinary sanctions up to dismissal. All complaints of sexual harassment and assault shall be dealt with at the highest level of scrutiny, and examined courteously and in confidence. No one shall suffer any harm or be subject to any differential treatment due to raising such a complaint. Aras Kargo shall provide the required support to the sexually harassed or assaulted person to eliminate all permanent or temporary consequences thereof.

- iv. **Mobbing** is defined as all kinds of malicious, intentional, negative attitudes, behaviours and conduct against any person(s) by one or more persons, which are systematically continued for a certain period of time, with the objective to intimidate, pacify or distance such person(s) from work, and which harm the personal values, professional status, social relations or health of the victim(s). Mobbing may be exerted by superiors on subordinates, by the subordinates on superiors or between equals.

However, given that they involve different legal classifications and consequences, i) physical violence, sexual harassment and/or insults; ii) negative attitudes, behaviour, arguments and quarrels which are incidental or one-off or which even if repeated, are not continuous and can be linked to stress and natural workload; and iii) attitudes and behaviours outside the workplace cannot be accepted as mobbing. Yet, Aras Kargo undertakes to handle such type of conduct with the same sensitivity as well.

Mobbing at workplaces can be vertical (directed from superiors towards subordinates or from subordinates to superiors) or horizontal (directed by those working at the same level or in the same hierarchical group towards each other). Examples of mobbing include but are not limited to: systematic criticism of one's work, scolding, cutting of communication, ridiculing one's private life, singling out, assignment of work below one's capacity, assignment of tasks not part of his/her main job, continuous interrupting his /her speech, revoking assigned work or not assigning any work.

Aras Kargo adopts the necessary measures in order to prevent the occurrence of any type of harassment or violence, with the intention to maintain its corporate image as well as the personal reputation of its Employees, and carries out inspections and imposes sanctions which are suitable, in case of the occurrence of such an incident. Aras Kargo does not tolerate any form of physical, verbal, sexual, psychological or emotional harassment, assault, bullying, abuse or threat.

3. POWERS AND RESPONSIBILITIES

Aras Kargo undertakes, with this Policy, that it shall not disregard any active or passive conduct resulting in any form of harassment, violence or discrimination; 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 violation of this Policy, the agreements of any business partner or supplier shall be terminated.

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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4. DOCUMENTS

PR.DNT-01: Code of Conduct and Ethics