

Scope: Provision of foreign trade services, customs clearance, warehousing, sea, road, air, and intermodal (rail) logistics operations, as well as inland and international delivery services.

Apron Global Logistics is dedicated to upholding the highest standards of corporate responsibility, ethics, and legal compliance in all aspects of its logistics, customs clearance, warehousing, and foreign trade services. This policy outlines the principles that guide our actions across operational, legal, social, and environmental domains.

1. Legislation and Regulations

- Full Compliance: All activities are performed in compliance with national laws and international regulations, exceeding statutory obligations where possible.
- Individual Responsibility: All employees must understand and apply laws and internal policies relevant to their duties.
- Knowledge: Employees are expected to remain informed of all legal and ethical obligations within their roles.
- Compliance Management: A dedicated compliance unit monitors and records all regulatory updates and adherence actions.

2. Anti-Money Laundering, Terrorism Financing, and Financial Crime

- Sector Risk Awareness: Recognizing the vulnerabilities in logistics and trade to financial crime, Apron has implemented strong risk management systems.
- Regulatory Framework: Apron complies with:
 - Turkish AML regulations
 - FATF 40 Recommendations + 8 Special Recommendations
- Training: Financial personnel are trained to detect and prevent AML/CFT risks.
- Oversight: Compliance officers oversee KYC/KYS processes, suspicious transaction reports, and record-keeping procedures.

3. Chain of Custody and Document Integrity

Apron ensures full traceability and verification of all freight documents and processes throughout the supply chain to protect transparency and legal accuracy.

4. Anti-Bribery and Facilitation Payments

- Prohibition: All forms of bribery and facilitation payments are strictly prohibited.
- Fair Competition: No payment, gift, or favor that compromises integrity is tolerated.
- Compliance: This policy fully complies with national and international anti-corruption regulations.

5. Transparency and Disclosure

Service scopes, delivery conditions, documentation, and all contractual obligations are disclosed transparently to all stakeholders and clients.

6. OECD-Aligned Sourcing Policy

Apron avoids engaging with suppliers or contractors associated with high-risk regions or unethical practices and supports continuous improvement where risk is identified.

7. Supply Chain Oversight and Best Practices

- Supplier Compliance: Apron expects all partners to follow international human rights, labor, environmental, and safety standards.
- Monitoring: All contractors and suppliers are regularly evaluated and audited for ongoing compliance.

8. Other Corporate Principles (Summary)

- Employment Ethics: Equal opportunity and anti-discrimination principles are applied.
- Occupational Health & Safety: Safe working conditions are ensured in all operational areas.
- No Child or Forced Labor: Apron has a zero-tolerance policy for such practices.
- Environmental Responsibility: Carbon emissions, waste, and logistics-related impacts are managed responsibly.
- Product/Service Integrity: The safety and security of transported goods are guaranteed throughout their journey.

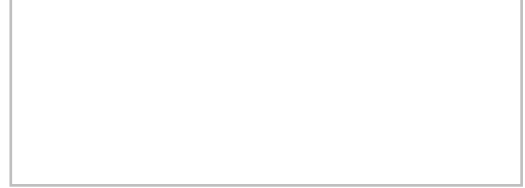
Reporting Violations

All stakeholders are encouraged to report suspected breaches in this policy via:

- compliance@apronglobal.com.tr

APPROVED BY THE CEO AND THE BOARD OF DIRECTORS

Apron Global Logistics Foreign Trade Ltd. Co.



PREPARED AND APPROVED BY APRON GLOBAL LOGISTICS BOARD OF DIRECTORS