

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.

Overview

Apron Global Logistics is fully committed to complying with all applicable anti-bribery and anti-corruption laws and maintaining the highest standards of ethical business conduct. We expect all employees, partners, and third-party representatives to act with honesty, transparency, and integrity in all dealings related to the company. This policy applies to all full-time, part-time, temporary, and seasonal employees, as well as contractors, suppliers, business partners, and third parties acting on behalf of Apron Global Logistics.

Purpose and Policy Application

This policy aims to:

- Provide clear guidance on anti-corruption compliance.
- Encourage the reporting of suspected violations.
- Ensure that all parties avoid actual or perceived unethical behavior.
- Apron Global Logistics maintains a zero-tolerance stance toward any form of bribery or corruption. All reported concerns will be investigated, and necessary disciplinary or legal action will follow.

What is Corruption?

Corruption refers to the abuse of entrusted power for personal or business gain. Common forms include:

- Bribery: Offering, giving, receiving, or soliciting something of value to influence a decision improperly.
- Facilitation Payments: Unofficial payments made to speed up routine actions by public officials.
- Kickbacks: Payments made in return for securing improper business decisions.
- Fraud: Deception used to gain an unfair or unlawful advantage.

Prohibited Forms of Corruption

1. Government Bribery

It is prohibited to offer, promise, or accept anything of value (cash, gifts, entertainment, etc.) from public officials to influence their actions improperly.

2. Commercial Bribery

Employees and representatives may not provide or accept benefits to gain improper advantages or business relationships from private parties.

3. Facilitation Payments

All unofficial payments intended to expedite government services are strictly prohibited. Only legitimate payments made according to published schedules are permitted.

4. Kickbacks

Any kind of secret or reciprocal payment in procurement or business relations is strictly forbidden and must be reported.

Reporting Violations

Employees and external parties are encouraged to report any suspicions of corruption or unethical conduct via the company's confidential Ethics Hotline:

- www.apronglobal.com.tr/hotline
- compliance@apronglobal.com.tr

All reports will be investigated with strict confidentiality, and necessary action will be taken.

Consequences for Non-Compliance

Failure to comply with this policy may lead to:

- Disciplinary actions, including termination of employment.
- Legal action, including civil or criminal prosecution.

Policy Updates

This policy will be reviewed and revised regularly to reflect regulatory updates and industry best practices.

Resources and Support

If you have questions, contact the Ethics & Compliance Team at:

- 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