

Trade Sanctions & Export Controls Policy

1. Purpose

As a global logistics company operating in 195 countries, GENEL TRANSPORT acts primarily within the framework of international agreements to which the Republic of Türkiye is a party, United Nations (UN) Security Council resolutions and regulations adopted under national legislation. Our company bases its approach on full compliance with the Republic of Türkiye's trade sanctions and export control regulations, and also undertakes to manage compliance processes by closely monitoring current restrictions imposed by actors such as the EU and the United States within the scope of global operational requirements and supply-chain security.

2. Prohibited Parties and Countries

Governments and international organizations may apply sanctions and export control regulations to restrict certain transactions and the trade of goods and services for various purposes.

In general, sanctions:

- Prohibit doing business with designated persons and entities and with entities owned or controlled by such persons and entities.
- Prohibit or restrict doing business with certain countries or regions.
- Prohibit indirect transactions that facilitate transactions that cannot be carried out directly.

GENEL TRANSPORT does not do business with persons or entities on international sanctions lists, entities owned or controlled by such persons or entities, or regions or countries where business is prohibited. Apart from this, transportation to embargoed countries is carried out only if all necessary licenses and permits are obtained from the relevant authorities and legal obligations are strictly complied with.

3. Cargo and Goods Control

Relevant unit managers must know the nature of the cargo carried by GENEL TRANSPORT.

Dual-Use Materials: For the transportation of products that can be used for both civilian and military purposes, compliance with relevant export control regimes and customs legislation is required.

Aerospace Logistics: Extra sensitivity is shown in transportation for the aviation sector, within the framework of national and international aviation legislation.

4. Operational Responsibility

Documentation: GENEL TRANSPORT relies on the accuracy of information in transport documents such as bills of lading, AWB, CMR and summary declarations. It does not permit intentionally misleading information to be shared.

Regulatory Monitoring: GENEL TRANSPORT closely follows changing customs legislation and sanctions decisions taken by governments and international organizations, and provides customers with proactive and results-oriented guidance.

5. Authorized Economic Operator (AEO) Status

The Authorized Economic Operator Certificate held by our company is an indicator of the importance GENEL TRANSPORT attaches to supply-chain security. Compliance with trade sanctions is also a critical requirement for preserving this status.

6. Consultation and Reporting Violations

If a GENEL TRANSPORT employee has any doubts regarding sanctions, they must consult the General Manager before taking action. Violation of sanctions carries serious commercial and reputational risk for GENEL TRANSPORT.

Therefore, GENEL TRANSPORT employees must fulfil their duty to monitor the sanctions described in this policy with due care and attention. In the event of a violation of sanctions announced by governments or international organizations, severe disciplinary penalties, including dismissal, may be applied to employees in view of the consequences GENEL TRANSPORT may face. GENEL TRANSPORT takes all reports seriously and keeps them confidential unless disclosure is required by law.