



asya nakliyat
international movers

POLICIES

PERSONALLY IDENTIFIABLE INFORMATION (PII) AND DATA PROTECTION POLICY

Asya is strongly committed to protecting the privacy of our customers and suppliers while doing business. In providing our services we are required to collect and use the private information trusted to us, but we will only use this information for the purpose authorized to us, and we will only disclose to third parties on an absolute 'need to know' basis. Asya defines documents, communicates and assigns accountability for its privacy policies and procedures.

Upon accepting our quotation, our clients are automatically accepting that the necessary and relevant personal data will be used to carry on the contracted services and can be shared with only relevant employees and suppliers.

Consent

We will always give our clients a choice regarding how the personal information they provide us may be used. For example, during the process of helping our customers move their homes and businesses and/or relocate to new areas, Asya may share personal information with carefully selected third-party companies, organizations and government agencies in order to facilitate an easy moving process and give our customers access to local resources they may find helpful in their new location. Such companies may include (based upon services being offered):

- Building managements where our clients are residing
- Customs officers
- Destination Service providers
- Insurance brokers

Our customers will always have the opportunity to opt in or out of any data collection or distribution, although some services we provide may be limited. If you do not want us to share your personal information with these companies, contact us at quality@asyanakliyat.com.

PRIVACY NOTICE: Asya collects, uses, retains and discloses private information of our clients, private and corporate accounts, and this personal data will be used by our employees and suppliers while providing the necessary services required for international transportation such as during customs formalities and/or packing and delivery services even for billing purposes.

Purpose

The purpose of this policy is to ensure that all personally identifiable, sensitive and confidential information and data is stored, retained, made accessible for use and reuse, and eventually disposed of, according to legal, statutory, ethical and client requirements.

The personal data must;

- be processed fairly and lawfully and obtained for specific, lawful purposes
- be adequate, relevant and not excessive

- be accurate and kept up to date and be held for any longer than necessary
- processed in accordance with the rights of data subjects
- be protected in appropriate ways

The policy applies to;

- the head office of Asya
- all branches of Asya
- all staff of Asya
- all contractors, suppliers and other people working on behalf of Asya

It applies to all data that the company holds relating to identifiable individuals, and these can include;

- name, date of birth, place of birth
- postal and email addresses
- telephone numbers
- Copies of passport bio pages
- plus any other information relating to individuals

Everyone who works for or with Asya has some responsibility for ensuring data is collected, stored and handled appropriately. Everyone that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles. By the whole company it must be ensured that;

- Any personal data that is being hold is kept securely
- Neither orally nor in writing, they cannot be disclosed or accidentally or otherwise to any unauthorized third party

Employees are made aware that unauthorized disclosure will usually be a disciplinary matter, and may be considered gross misconduct in some cases.

The data controllers of Asya are as stated below:

- Quality Manager: Banu Demirel
- Quality Manager Assistant: Yeşim Kocaçonduk

Personal information must be:

- kept in a locked drawer or filing cabinet
- if it is computerized, be password protected; or
- kept only on external hard drive which is itself kept securely
- protected not only from unauthorized access and theft, but from damage that can be caused by vermin, fire, water, mould and natural disasters

Physical client files are stored onsite at our secure premises which are security patrolled and monitored by closed circuit TV. Completed service files are archived onsite for 10 years, however, unnecessary personally identifiable, confidential and sensitive information should be removed from files upon the ultimate completion of file. This information must be shredded and a note made in the file to record the destruction.

All employees are required to maintain a clean desk at all times in reference to securing files in progress at the end of each day and on weekends. Confidential original personal documents such as client passports and work/residence permits must be locked in a safe in a locked office during any rare occasion where they may be in our possession (for example, during customs clearance services). Employees should make sure paper and printouts are not left where unauthorized people could see them, like on a printer.

Policy Statement

Asya International Movers acknowledges that the management of personally identifiable information must be consistent with relevant legislation, codes, and client guidelines. This policy supports Asya`s commitment to comply with legislation in the Republic of Turkey as well as the standards required by our clients and regional management companies with whom we have contracted services.

All individuals employed at Asya and our suppliers have a responsibility to manage personally identifiable and confidential information with care, and use only for only the purposes authorized.

Electronic Records

A reputable IT provider is contracted to manage our servers and the security of our electronic data. We have had a secure agreement with the same trusted IT provider for over 10 years and have not experienced any security breach in this time.

Our server`s onsite at our office together with backup server offsite is monitored and maintained by our IT service provider. Systems are reviewed onsite weekly and daily backups are carried out. Anti-virus software is run on all our computers, regular backups of data are performed, and passwords are stored so as not to compromise the security of the data they protect.

We have the capability for inbound and outbound opportunistic TLS encryption between our clients and ourselves.

Electronic records, including email communications and PDF documents must remain available, accessible, retrievable and usable for as long as a business need exists or as long as legislative, policy and archival provisions and procedures require them to be kept.

Accessing information

Individuals may review their personal information contained in Asya files by contacting the Quality Manager. If an individual believes that any of their personal information is inaccurate, we will make appropriate corrections.

Disclosure

Asya will not wilfully share the personal information collected from our customers without their consent. We will share your personal information with third parties only in the ways that are described in this privacy policy. The only exception to this policy is when we are required to do so by law, such as to comply with a subpoena, or similar legal process, when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.

Changes in this Policy

If we decide to change our privacy policy, we will post those changes to this privacy policy, the home page, and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. We reserve the right to modify this privacy policy at any time, so please review it frequently. If we make material changes to this policy, we will notify you here, by email, or by means of a notice on our home page, prior to the change becoming effective. The compliance of this policy is monitored each year by Quality Manager and necessary changes will be made immediately in case of a complaint or dispute.

Environmental Policy

We believe that what we take from the nature should be given back. With this in mind we try to minimize our consumption and maximize our contribution to nature.

As a leading fine art logistics and household goods service provider, we are devoted to reduce our impact on the environment without compromising the quality of the service we provide.

In light with our principles of commitment to sustainability and protecting our environment, we;

- Use packing materials and cartons made from recycled and recyclable and unbleached materials
- Have buildings that are designed to be energy efficient
- Use environmentally friendly fuel additives to reduce particulates in exhaust emissions
- Use low energy lighting and minimise use of electronics
- Minimise unnecessary water consumption
- Aim to consolidate shipments to minimise the number of trips
- Encourage our staff to combine their trips in a single vehicle or use public transport
- Minimise production of waste, reuse and recycle wherever possible
- Maximise use of IT to reduce use of paper and print
- Use water soluble paint and varnish, non-solvent adhesives
- Choose our suppliers who are also environmental friendly
- Donate periodically to The Turkish Foundation for Combating Soil Erosion, for Reforestation and the Protection of Natural Habitats

ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

As a member of FIDI, Asya International Movers conducts business with a commitment to acting professionally, fairly and with the utmost integrity. Our Anti-Corruption and Bribery policy is clear and we support our employees to make decisions in line with our policy.

All our suppliers, whether FIDI members or not, are obliged to accept the terms of this policy and inform Asya in case of fail to comply.

PURPOSE AND SCOPE

Corruption is to obtain, give or accept bribery or an illegal interest directly or indirectly. Our company has the rules for establishing and preventing corruption acts to protect its integrity and reputation and these rules are shared with the personnel all the time.

ACTS CONSTITUTING CORRUPTION

The acts, qualified as corruption, include without limitation embezzlement, abuse of trust, bribery and other improper behaviors in financial terms.

BRIBERY

Bribery is to obtain interest illegally or offer payment or interest, directly or indirectly, to influence decisions and applications. This situation may occur in different forms such as cash or non-cash payment, giving valuable gifts etc.

When the employees perform their duties, they may not make a payment, which may be qualified as a bribery, to a third person or may not tolerate such an offer, promise, request, giving or acceptance by the counter party. It is forbidden to offer and give a gift, entertainment, honoring or other interest, directly or indirectly, to foreign or domestic state and public officials unless the required approvals are given by the Company Management.

REPORTING CORRUPTIONS AND RESPONSIBILITIES

All employees must report the violations related to corruption to protect prestige of the Company to the management. If an employee breaches these rules, the authorities related to "Anti-Corruption" are informed. If any circumstances related to corruption acts are not reported or ignored although they are realized, it is also considered in the scope of violation of the Anti-Corruption rules.

ANTI-CORRUPTION AND COMPLIANCE

When the employees perform their duties, they are obliged to comply with the legislation and rules in the Anti-Corruption Policy and lack of knowledge on these rules may not be accepted as an excuse of violation. ASYA has no tolerance against the corruption acts.

The employees may not request, obtain and accept any object or service in excess of the symbolic value equal to 30 Dollars or any interest such as cash, cheque etc. irrespective of its value for any business or transaction.

To eliminate an impression that an employment offer, whether temporary or permanent, may be a form of corruption act, such offers may not be made to customers, business partners (persons known to be related to them closely) or state officials and public officials (or those known to be related to state officials closely) "other than the normal competition-based recruitment processes".

ASYA does not establish a relationship with any persons or entities who were heard or suspected to give bribery to the third persons in its relationships with any persons and/or entities such as agents, suppliers and contractors providing service in the capacity of an

agent, acting as a management consultant or involved in the functions like accounting, payroll, information technologies or facility management and if there is such a relationship, this relationship is terminated immediately. Any persons, suppliers or contractors, who are related to ASYA and act on behalf of it, are required to agree to comply with the legal regulations and all Anti-Corruption laws in force.

In the businesses with those making business with ASYA or third parties, a copy of the relevant sections of this policy is given to them and they are informed about their obligation to comply with the Anti-Corruption policy. Acts of those making business jointly or third parties are treated to be committed by ASYA.

ASYA may not make donation for political purposes.

ASYA may provide aid and sponsorships if air-purposed contributions and sponsorships, to be requested, are legal and conforming with the regulations, policies, directives and rules of the Company.

FACILITATION PAYMENTS

Facilitation Payments are illegal under many laws and ASYA expressly prohibits such payments. Thus, directors, officers, employees, agents, customers, suppliers or other business partners and stakeholders are not allowed to solicit, make or receive facilitation payments on behalf of ASYA. They are also not allowed to solicit, make or receive such payments for themselves or any other person whom so ever in the course of ASYA.

CORPORATE SOCIAL RESPONSIBILITY POLICY

Our organization values the interest of society and is committed to helping society beyond profit. Not only as the management we are involved to benefit local organizations, but we support our employees to give their personal time and knowledge to do so.

Asya recognizes and respects that we have a responsibility for the impacts of our decisions and activities on society and our environment.

In line with our vision and mission, we operate our business in a socially responsible manner with high standards of integrity.

We declare as an organization we are committed to;

- Conducting our business ethically and with transparency
- Contributing to sustainable practices
- Taking into account the interests and expectations of all our stakeholders
- Complying with applicable local laws
- Complying with international norms of behavior
- Maintaining legal, ethical, fair and objective working conditions and providing equal opportunity employment initiatives
- The health and safety of individuals, including staff, clients and visitors
- Treating all stakeholders with respect and dignity in all our dealings
- Contributing positively to the community in which we live and work

Our Corporate Social Responsibility program covers;

- Environmental aims, reducing waste, energy and water consumption within the office
- Ethical issues, such as paying a fair price for goods and services consumed during the operation of our business
- Ensuring a better quality of life for everyone, including work/life balance of employees
- Ethical business relationships, paying on time and following clear codes of conduct in our business dealings
- Encouraging and supporting volunteering efforts by employees

RESPONSIBILITIES

The CEO and Operation Manager are responsible for ensuring our business operates in compliance with legislation and within the terms of this policy and the management team has the responsibility and authority to implement this policy in their respective teams. However, all employees of Asya International Movers have a responsibility to support and participate in initiatives.

The willingness to do more in the field of the CSR is considered important by the management team at Asya International Movers and employees are encouraged to participate in socially responsible activities with support of their managers.

CODE OF CONDUCT

Honesty and reliability are the basic principles of ASYA. All personnel, directors and partners are expected to act based on honesty, integrity and trust.

RESPONSIBILITY

The personnel must act in accordance with the laws on each matter. All employees are obliged to learn and comply with the laws, regulations and Company policy related to their job. Each employee must consider it if he/she doubts whether his/her act violates the Code of Conduct. He/she must question answers of the following questions in his/her consideration:

- Is the act legal and ethical?
- Does the act impair dignity of the Company and employee?
- Can the employee tell the act to his/her family and relatives easily?

If any of these questions is answered negatively, he/she must avoid such act. In the event of doubt, he/she must request the responsible persons or Company Management for information on the issue. It is required by honesty not to conceal or contribute in a violation committed separate from the foregoing.

Responsibilities towards Customers and Suppliers

Customers and suppliers are treated with equality, honesty and respect with discrimination. The Company's services are offered and conducted all the time honestly. Each employee perform his/her duty by acting without any expectation of interest. Expectations and demands of the customer are tried to be met as soon as possible. The service is performed at the promised time and conditions.

Unfair, misleading and deceptive statements and behaviors are forbidden.

Suppliers are expected not to act in violation of the Code of Conduct. Suppliers are treated fairly and respectfully and due attention is paid to prompt satisfaction of obligations. Confidential information of suppliers is protected.

Anti-trust and ant-competitive activities are forbidden. Agreements with potential competitors which prevents, restricts or distorts competition is not allowed.

Responsibilities towards the Company

The Company carries out its service at the top level in the framework of the commitments given and code of conduct. Due attention is paid when the activity is performed. ASYA targets to work with customers, business partners and personnel conforming to the integrity and honesty principle. It does not make business with those giving damage to the value judgments of the community, environment and public health.

The personnel can only express the opinions of ASYA, not their own opinions when they consider themselves to speak on behalf of ASYA. They do not make comment on the issue and consult with the responsible persons in any circumstances which may put the Company under risk.

Policies Supporting Code of Conduct

Occupational Safety: ASYA takes the required measures to maintain occupational health and safety. The employees are also obliged to comply with the legal regulations regarding Occupational Health and Safety.

Personnel Policy: ASYA acts in accordance with all laws and regulations related to employment and working life when it carries out its activities. The employees also act in accordance with the legal requirements when they perform their job. It conducts all applications related to employment, including without limitation recruitment, promotion, termination, leave, overtime, without discrimination and makes effort to eliminate all kinds of force and forced labor and child labor.

ASYA rejects and does not tolerate all forms of abuse and discrimination. Abuse may be realized with verbal or non-verbal acts and all forms of it are forbidden. Examples of abuses violating the laws include without limitation;

- Verbal or written abuse based on race, gender, nationality, age, religion, disability or another feature of an employee, comments and critics related to his/her body and associated appearance or life style, showing or displaying obscene graphics, comics, images, photos or objects, obscene stories, jokes, implicit statements or comments
- Treating the counter party in bad faith to be perceived as an undesired sexual behavior, staring at him/her or similar disturbing non-verbal behaviors, a sexual approach, physical contact, offer or touch
- Implying that there is a connection with religion, sexual behaviors of the employee and employment, promotion, salary or other issues related to employment or make a declaration to give rise to such implication logically.

Retaliation against any person who reported an actual abuse constitutes violation of the Code of Conduct. ASYA does not accept retaliation acts.

Avoidance of Bribery: ASYA is opposed to all forms of bribery and ASYA personnel may not accept or offer a gift, earning, aid, entertainment or similar offers which may affect their objectivity, decisions and behaviors.

Competition and Antitrust: The antitrust law prohibits any agreements to limit trade or reduce competition. Attention is paid to any activity undertaken with the authorities of other companies not to fall within the scope of a breach of the antitrust law or not to be considered so.

Conflicts of Interest: ASYA must avoid possible conflicts between their personal interests and interests of the Company. The personnel avoid using resources, name, identity and power of ASYA for their personal benefits or any circumstances which may adversely affect reputation and image of the company. The personnel may not enter into a business relationship with the family members, friends or third persons providing mutual or unilateral benefit. Likewise, the employee is expected to be careful about possible conflict of interest to arise from a family member working in the competing firm.

The personnel may not perform insider trading, may not gain benefit and do not permit others to do it in this manner.

The employee may not accept duty in a company being a competitor or having a business relationship without approval of ASYA.

Malpractice: Damages to ASYA as a result of breach of the employee in exercise of his/her powers or exercise of them for the interest of his/her relatives are unacceptable.

SUPPLY CHAIN

Asya Nakliyat acts in accordance with the laws, ethical values and environment when it performs its operations. It gives priority to the policies and values of FIDI FAIM (Federation Internationale des Demenageurs Internationaux) of which it is a member. All adopted policies and principles allow for prevention of the human rights violations and bribery and corruption; increased working conditions and service and product quality and formation of the required audit mechanisms.

Asya Nakliyat cares about supply of the products and services required for performance of its operations in accordance with the laws and ethical values preventing such supply from any resources violating the human rights, occupational health and safety and environment. Therefore, it pays attention to conformity of the performed operations with the Responsible Purchasing Policy.

Responsible Purchasing Policy has been formed based on the policies and principles adopted by FIDI FAIM and principles and rules adopted in the Code of Conduct, Occupational Health and Safety Regulations published by our company.

The Responsible Purchasing Policy targets to circulate and maintain the values and policies adopted by us along with the full supply chain. To achieve this target, we expect our suppliers to be in cooperation with our company. For continuous improvement, we pay attention to feedbacks and sharing positive practices. Therefore, Asya Nakliyat acts in accordance with the Responsible Purchasing Policy in supplier selection.

PRINCIPLES RESPECTED IN RELATIONS WITH SUPPLIERS

1. Acting in accordance with the laws and ethical values

It is essential for suppliers to act in accordance with laws and applicable legislation in their activities. We expect all suppliers to adopt the honesty, integrity and transparency principle and act in accordance with the laws and ethical values.

2. Respecting the Human Rights and Working Rules

It is essential for suppliers to be respectful to the human rights, far from discrimination and provide their employees with equal opportunities and chances. We expect suppliers not to make discrimination among their employees, to allow for equality of opportunity, not to apply forced labor or child labor.

We pay attention for suppliers to act by respecting the rules of occupational health and safety to provide a safe working environment. It is important for us to ensure them to treat trade secrets of their customers as confidential diligently.

3. Environmental Sensitivity

We expect suppliers to minimize possible effects on the environment during their activities and produce products and services to protect the environment, customers and employees.

We require any suppliers, who are found to violate the above-mentioned principles and policies, to eliminate the violation and make arrangements in accordance with the adopted policies primarily. Business relationship is terminated with any suppliers who does not accept to eliminate the violation or fail to make the requirement arrangement and conformity in the specified period.

Escalation Procedure

If our client experiences any issue or problem during their service and feel they would require more senior intervention, the following escalation process is available to resolve the issue quickly and effectively.

If you feel any discomfort with our policies, procedures please feel free to escalate the situation as follows.

Our escalation levels;

- Import/Export Manager
- Quality Manager
- President

Depending on the nature and severity of the issue, either (or all 3) levels can be accessed at any time.

Types of escalation;

- Service concerns and dissatisfaction
- Procedural concerns
- Timing/Scheduling issues
- Invoicing/billing issues

Escalations will be managed by a single point of contact, usually the team manager, with ultimate responsibility and decision making by the President.

Timing

Acknowledgement of the escalation will occur within 4 business hours, and ultimate resolution aimed to be within one business. If third parties are involved then this may take longer, but full priority will be given to achieve a quick and satisfactory resolution.

Escalation Contacts for Main Office

| | Department Managers | Quality Manager | President |
|--------|---|---|---|
| Export | Banu Demirel +90 212 359 2015 banu@asyanakliyat.com | Yesim Kocaconduk +90 212 359 2014 yesim@asyanakliyat.com | Ebru Demirel +90 212 359 2020 ebru@asyanakliyat.com |
| Import | Banu Demirel +90 212 359 2015 banu@asyanakliyat.com | Yesim Kocaconduk +90 2012 359 2014 yesim@asyanakliyat.com | Ebru Demirel +90 212 359 2020 ebru@asyanakliyat.com |

Escalation Contacts for Ankara Branch

| Branch Manager | Quality Officer | President |
|--|--|---|
| Halil Aytakin +90 312 417 41 84 ank@asyanakliyat.com | Meral Sahince +90 312 417 41 84 meral@asyanakliyat.com | Ebru Demirel +90 212 359 2020 ebru@asyanakliyat.com |

Escalation Contacts for Izmir Branch

| Branch Manager | Quality Officer | President |
|---|---|---|
| Mrs. Nicole Ozmirza +90 232 441 76 06 nicole@asyanakliyat.com | Mrs. Nicole Ozmirza +90 232 441 76 06 nicole@asyanakliyat.com | Ebru Demirel +90 212 359 2020 ebru@asyanakliyat.com |

Alternative email: quality@asyanakliyat.com