# **Risk and Compliance**



Risk management and compliance are integral to our Corporate governance and responsible business practices. Risk and Compliance within Aramex include the activities and processes related to risk management, compliance, health, safety, security, as well as our Corporate insurance.

The Aramex Risk Management function's objectives involve comprehensively and holistically identifying, assessing, mitigating, monitoring risks to support effective decision-making across the company, and safeguarding stakeholders and assets.

We understand that the dynamic and ever-changing business landscape impacts and evolves Aramex's risk profile, which is why we work to remain responsive and diligent. As part of our risk management and compliance culture, we strive to protect our employees, serve our customers and communities, and respond to any arising global challenges.

Through our Enterprise Risk Management (ERM) Framework, we proactively manage strategic, financial, compliance, operational, and sustainability risks across Corporate, country, process, and project levels. This involves supporting Aramex's strategic objectives and planning in the short-, medium-, and long-term.

Our ERM framework also ensures that we identify, manage, and oversee key risks using a consistent approach that provides a holistic overview of how these risks emerge and are managed.

Aligned with the Aramex strategy, our Enterprise Risk Management Framework includes defined processes, policies, and procedures for risk identification, assessment, and management across all levels of the company and business operations.

More details can be found on pages 106-107 in our <u>2022 report</u>.

<b>Risk Capability Network</b>	Risk Champions from different Aramex functions and locations are identified and empowered to
Risk Governance	The Management Risk Committee, which is chaired by the Group CEO and includes the Executiv and challenges.
<b>Risk Monitoring</b>	Continous review of risks, including updates on "risks drivers", and the status of "Key Risk Indicat undertaken by the risk management team and the risk committee.
Risk Reporting	Dedicated Board meetings are conducted on Risk Managment and Internal Audit issues where de mittee to ensure the effectiveness of the Risk Management program and its processes.
Risk Assessment	Periodic risk assessments on different risk categories, functions, or sites are conducted to identify prioritization and management strategies.
<b>Risk Mitigation</b>	Implementing measures for the prevention or mitigation of risks, such as adopting policies, proc gency plans to mitigate risk impacts.
Risk Review and Evaluation	The Risk Committee regulalry reviews and evaluates Aramex's risks and management strategies t
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o support with risk assessments, monitoring, and management.

tive Leadership team, meets quarterly to disucss and review key risks

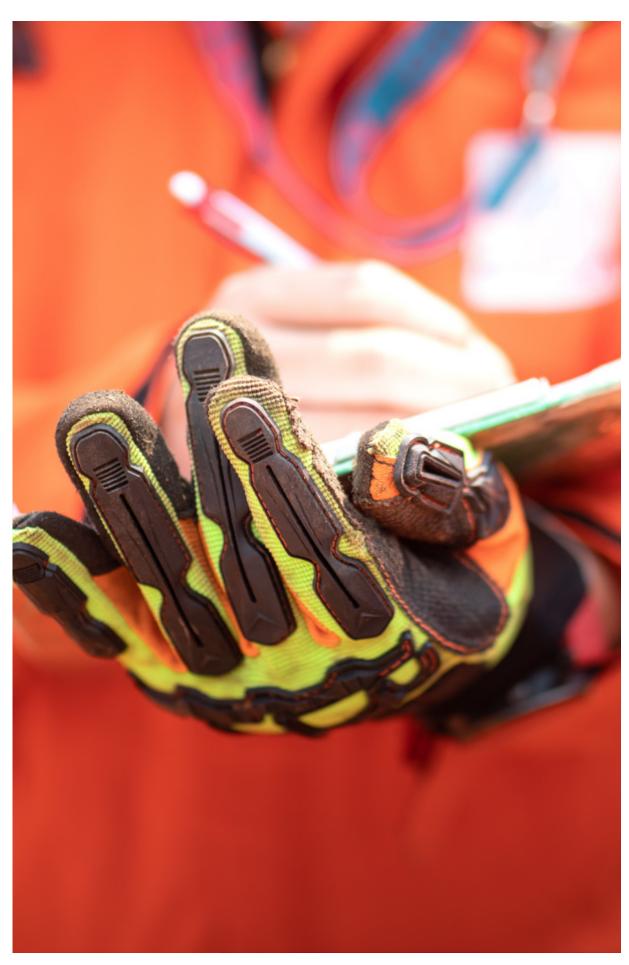
ators", along with the review and tracking of planned risk actions are

detailed quarterly risk reports are presented, allowing the Audit Com-

ify potential risks and their impacts and support in the process of risk

cedures, and controls to reduce risk likelihood or employing contin-

to ensure effectiveness.





#### **Ensuring Accountability**

Accountability is critical in our risk management processes, and as such, an Executive owner is assigned to each key Corporate risk, including environmental and sustainability risk areas. Executive owners are responsible for ensuring that appropriate controls, action plans, monitoring, and reporting processes are implemented. Key risks are reported and reviewed quarterly during the Executive Management Risk Committee, as well as the Board Audit Committee meetings.

#### Managing Uncertainties and Emerging Risks

Managing uncertainty is an important part of risk management. We might face instances where information on emerging risks may be insufficient for us to fully understand the impact and scale of these risks. Our risk management process accounts for and continuously monitors certain emerging risks that may impact Aramex. Examples of such emerging risks include: Impact of Environment & Climate Changes, Geo-Political & Economic Uncertainty, and Digital Disruption, among others. Our holistic approach to risk management allows us to minimize the uncertainties from emerging risks, accounting for them in our contingency and mitigation plans.

#### **Climate Risk Assessment and Management**

Climate change poses a critical risk concern for Aramex, both due to the physical risks (i.e. caused by the increased frequency and severity of extreme weather events) and the transition-related risks (i.e. economic, technology, or regulatory challenges related to moving to a greener economy).

Driven by our understanding of these critical risks, Environmental Sustainability risks are included in our Corporate Risk Profile. This includes monitoring environment and climate risk related metrics and developing action plans to respond to climate related risks and opportunities, following the processes and procedures of our Corporate risks. Our Chief Sustainability Officer heads the sustainability agenda as part of our purpose-led strategy and has overall accountability for managing our efforts to mitigate climate change risks and impacts.

To know more about how we manage our environmental and climate related risks, please refer to our section on Environmental Stewardship on page 35.

### **Compliance at Aramex**

Our compliance function is responsible for ensuring that all our internal stakeholders are aware of and implementing processes that minimize and mitigate statutory, regulatory, and reputational damage. Through this function, we ensure that we provide stakeholders with ample guidance necessary for upholding ethical and compliant business operations.

Within Aramex, we employ a precautionary and proactive approach to ensure compliance through training and internal and external policies, procedures, and controls that are embedded across the various Aramex functions. Our programs are consistently driving change and improvement in ethical and compliant behavior. Our main precautionary measures are our training programs, trade compliance, and Corporate compliance policies and procedures. These policies and procedures are also increasingly assimilated within the different Aramex functions via controls and process change to manage and reduce risk.





As a logistics and freight forwarding company, ensuring trade compliance is an important part of our compliance function. Our trade compliance program allows us to be informed and comply with all relevant trade laws and regulations across all our markets and areas of operations. The program includes import and export controls, sanctions monitoring and controls, and denied-party screening. Through the program, we screen customers, vendors, and transactions against sanctioned and other risky entities to ensure we are not inadvertently doing business with a denied person or party. This is to ensure that we minimize our risk exposure and safeguard the reputation of Aramex and its stakeholders.

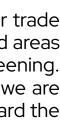
#### Compliance Training

Awareness of compliance issues, our Code of Conduct, and Corporate policies is crucial for ensuring each and every Aramex employee is able to uphold our policies and ethical business practices. Compliance training is part of our overall compliance strategy and our efforts to guide and empower employees to respond appropriately to relevant challenges or concerns.

All our employees receive automated training sessions. Additionally, our annual employee training initiative provides employees with the opportunity to enhance their understanding of our Code of Conduct and compliance guidelines and include a learner survey to assess their level of knowledge on relevant compliance matters. We also provide focused classroom sessions when needed or upon request.

nal ge nd nt	Compliance Training (Total including couriers)	2021	2022	2023
	Targeted Employees	14,749	15,609	15,771
	Completed	84%	91%	93%

#### Continual review and update of policies and procedures in line with regulatory landscapes and best practices









#### **Our Aramex Code of Conduct**

Our Code of Conduct provides the blueprint for our internal stakeholders to guide them in their interactions, transactions, and conduct on all business and internal operational levels. Employees are trained on the Code of Conduct as part of their onboarding, and it guides the development of our policies, processes, and procedures.

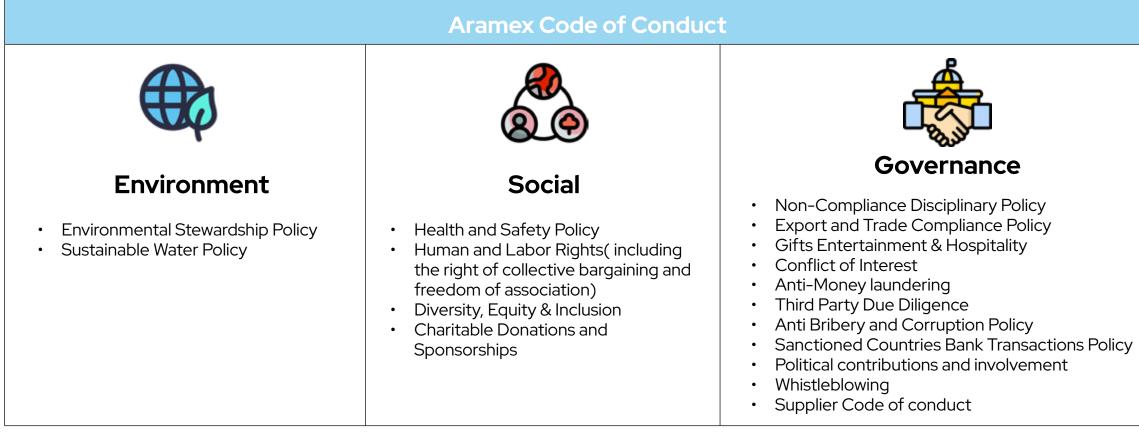
	<u>A</u>	Accountable, transparent, respectful, fair, and professional business practices			
	$\overline{\mathbf{e}}$	Safe, equitable, secure, fair, and healthy working conditions			
		Incorporation of compliance into day-to-day operations in every aspect of the business			
	8 1 8	Healthy and sustainable growth of business			
		Reliability and integrity of financial and operational information			
		Compliance with laws, regulations, policies, procedures, and contracts			
	e C	Safeguarding of assets, whether physical or intellectual			
	Figure 33: Aramax Code of Conduct				

Figure 33: Aramex Code of Conduct

#### **Aramex Policies**

Our policies provide additional guidance for our employees and stakeholders on how to handle different aspects of the business and adequately and appropriately deal with any topics and issues. Our policies cover different domains within our operations and engagement with different stakeholders. Policies are periodically reviewed and revised as needed to keep up with the evolving business and market needs, regulatory environments, and best practices.

Our Code of Conduct is aligned with international and national regulations and standards, which include (but are not limited to):



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- The World Economic Forum's Partnering Against Corruption Initiative (PACI)
- UK Bribery Act
  - U.S Foreign Corruption Practice Act (FCPA)
  - Accountability principles standards AA1000
  - International Labor Organization (ILO)
  - UN Declaration on Human Rights
  - Environmental standards (ISO 14001, LEED, local and international laws, and regulations, (UNGC)
  - Other applicable international and local laws

If in any case, our policies, procedures, and internal controls do not offer clear guidance for a particular course of action, we make sure that our employees and leaders are encouraged and expected to honor the spirit of the code or seek advice.

ISO Certifica	te Co	ountries Certified	Sites certified
ISO 9001		24	39
ISO 14001		30	47
ISO 45001		31	47



#### Whistleblowing System

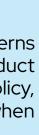
Our whistleblowing policy and process provides all Aramex stakeholders with a mechanism to report any grievances or concerns related to possible misconduct, irregularities, suspicion of fraud, or issues related to the application of our Code of Conduct or social and environmental performance. The process of our whistleblowing system is outlined in our whistleblowing policy, which is shared with our employees and publicly available and accessible, in order to encourage stakeholders to use it when needed.

#### The following channels are available to report external and/ or internal grievances and concerns:

Case Management System "Lighthouse www.lighthouse-services.com/aramex Hotline "Toll-Free" Telephone available 24/7. For more information, please refer to the Aramex Whistleblowing Policy.

All received cases are treated with the highest level of confidentiality. The Risk & Compliance function ensures that cases reported are handled promptly. An investigation is conducted into each case. A summary report of the quarterly whistleblowing cases received and investigated is reported to the Board Audit Committee as part of the Risk and Compliance report. Ad hoc investigations are also undertaken by the Risk and Compliance team where possible cases of corruption, fraud, or noncompliance are identified and reported outside of the Whistleblowing system.







#### Our Aramex Code of Conduct

Our internal audit function monitors and evaluates risk and control across Aramex and our network and aligns with our Audit Committee, regularly presenting reports and evaluations to Aramex's Executive Management team and Quarterly to the Audit Committee.

A dual reporting mechanism, which involves functional reporting to the Audit Committee and administrative reporting to the Group CEO, maintains the function's independence. Our strategy ensures that assurance and audit reviews are aligned with Corporate strategic objectives, achieved by the internal audit function through prioritizing a risk-based approach supported by data analytics, ongoing monitoring, and evaluation.

Our internal audit plan is designed to ensure reasonable assurances over the Aramex network, built on the following verticals:

Enterprise Risk Management

Internal Audit evaluation for merging risks

Internal Audit historical records

External factors with impact on corporate strategy

More details can be found on pages 109 and 110 of our 2022 annual report.



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