

Corporate Compliance Policies

COM 1151 - (A) Aramex Anti-Corruption Policy





1. POLICY PURPOSE

The nature of our business and geographical spread often requires interactions with various officials in the public and private sectors around the world. Our Code of Conduct, Applicable Anti-Corruption Laws “Applicable Laws” and this Anti-Corruption Policy “Policy” establish certain limits on these interactions.

This Policy is drafted to provide awareness about Aramex’s stance of zero tolerance for corruption and commitment to fair and ethical business practices to avoid violations of the Applicable Laws. Such violations might lead to severe penalties, fines or reputation damage; therefore, it is vital that we not only understand the importance of this Policy but comply with it in our daily transactions.

This Policy:

- Advises the laws applicable to our business worldwide, as well as the importance of complying with these laws.
- Describes the various forms of corruption.
- Illustrates situations where corruption might arise and the recommended course of action; and
- Details the avenues of support to be used for reporting compliance concerns and gaining additional guidance.

2. APPLICABILITY

This Policy applies to all employees of Aramex and its worldwide Related Parties¹, including officers, directors, full-timers, part-timers, contract and temporary employees. It covers all aspects of work, transactions, activities and business endeavors.

3. APPLICABLE LAWS

Aramex is committed to fair and ethical business practices and avoiding corruption of all kinds, including bribery of Government Officials² and private (non-government) individuals and entities. We abide by all applicable anti-corruption laws, including the Foreign Corrupt Practices Act (FCPA) of the United States, the U.K. Bribery Act (UKBA), the United Nations Convention against Corruption (UNCAC) and the local laws in every country in which we operate (“Applicable Laws”).

Some countries in which we operate may have laws stricter than those mentioned in this Policy. As a general rule, we follow the most stringent law, regulation or policy applicable to our business in these countries.

The combination of Applicable Laws and our global presence requires maximum alertness to corruption and full awareness of how to recognize and eliminate it from any transaction we are part of. In case of any doubt about what is expected of you under the Applicable Laws or this Policy, you must seek guidance from the Compliance or Legal Departments.

¹ **Related Parties:** subsidiaries, affiliates, joint ventures, franchisees, agents, consultants, contractors, sub-contractors and anyone else who perform services for or acts on behalf of Aramex.

² **Government Official:** any officer or employee of a government, any public international organization (such as the United Nations, the World Bank, or the International Monetary Fund) or any department, agency of a government or of any public international organization, or any person or a company, entity, or any other organization owned or controlled by, or acting in an official capacity on behalf of, any of the mentioned before.



4. RESPONSIBILITY (CALL FOR ACTION)

As employees and Related Parties of Aramex, we are all responsible to uphold the company values and to conduct business with integrity and honesty. The following actions must be taken to fulfill our commitment to fair and ethical business practices:

- Step away from situations that involve corruption or those that may be viewed as involving corruption.
- Stay alert to any red flags suggesting wrongdoing by another employee or a Related Party.
- Support and encourage other employees and Related Parties to comply with this Policy.

4.1. REPORTING VIOLATIONS

If you have any questions or concerns, or if you witness potential violations of this Policy, you must share your concerns with us. We operate under a “no retaliation” policy, which means that we will never retaliate against anyone who reports a concern to us in good faith. Additionally, your report will be treated with the highest level of confidentiality and we will endeavor to ensure that your identity is not disclosed.

If you prefer, you may anonymously report concerns through the Compliance Hotline at **Service Center - Whistle Blowing** <whistleblowing@aramex.com>.

Additionally, you may request the guidance of the following resources when you are uncertain about any obligations under this Policy:

- Compliance Department.
- Legal Department; or
- Direct Manager (unless the nature of the issue makes doing so inadvisable).

5. RESPONSIBILITY (CALL FOR ACTION)

As employees and related parties of Aramex, we are all responsible to uphold the company’s values and to conduct business with integrity and honesty. The following actions must be taken to fulfill our commitment to fair and ethical business practices:

- Step away from situations that involve a conflict of interest when selecting third parties, or any unethical action related to third parties.
- Stay alert to any red flags suggesting wrongdoing by another employee or a related party.
- Support and encourage other employees and related parties to comply with this Policy.

REPORTING VIOLATIONS

If you have any questions or concerns, or if you witness potential violations of this Policy, you must speak with us. We operate under a no retaliation policy, which means that we will never retaliate against anyone who makes a report to us in good faith. Additionally, your report will be treated with the highest level of confidentiality and we will take our best efforts to ensure that your identity is not disclosed.

Use the following resources to seek guidance when you are uncertain about any obligations under this Policy:



- The Compliance Department.
- The Legal Department.
- The Procurement Department.
- Direct Manager (unless the nature of the issue makes doing so inadvisable).

If you prefer, you may anonymously report concerns through the Compliance Hotline at [<whistleblowing@aramex.com>](mailto:whistleblowing@aramex.com)