

# Aramex Code of Conduct

Unlimited

# Message from the CEO

Dear Colleagues,

At Aramex, we pride ourselves on innovation, sustainable growth, corporate activism and integrity. Our Code of Conduct guides our business ethics - it represents who we are, what we do, and our values, both, internally while dealing with each other within Aramex, and externally, while dealing with the rest of the world.

As a global player we all play a vital role in fulfilling Aramex's commitment to ethical business conduct, by behaving in a way that exemplifies our core values as we undertake our daily activities. This includes helping to foster a safe, diverse and inclusive working environment where we deliver best-in-class services and solutions to our customers and always treat others with respect. To that end, each of us has a responsibility to act in a manner consistent with the Code whenever we face an ethical issue, including speaking up when we see behavior that compromises the principles of the Code.

I am the first person to adhere to this Code and it is imperative that we all do so. By upholding the highest level of integrity we send a clear message to those we work with about the strength of our commitment to ethical behavior. We also protect and enhance the reputation of Aramex and play a key role in building a better working environment for our people, clients and communities.

Thank you for your commitment to acting ethically and responsibly. "Do the right thing" and take pride in the fact that in doing so, you are contributing to making Aramex and the markets in which we operate a better place for all of us.

**Othman Aljeda**  
**Group Chief Executive Officer**  
**Aramex PJSC**  
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# Table of Contents:

## **I. Introduction**

## **II. Culture of Integrity in the Workplace**

- II.1. Non-Discrimination and Equal Employment Opportunities
- II.2. Equitable and Fair Treatment
- II.3. Safe, Secure, and Healthy Working Conditions
- II.4. Accountability
- II.5. Open Communication and Open-Door Policy
- II.6. Human and labor rights including anti-slavery and human trafficking
- II.7. Conflict of Interest

## **III. Culture of Integrity in Doing Business**

- III.1. Compliance with Laws and Regulations
- III.2. International Trade and Trade Compliance
- III.3. Fair Competition and Anti-Trust
- III.4. Anti-Bribery and Corruption
- III.5. Business Gifts and Entertainment
- III.6. Financial Records and Accounting
  - 6.1. Insider Trading
  - 6.2. Financial Records and Accounting
- III.7. Third Party Due Diligence
- III.8. Confidential Information and Intellectual Property
- III.9. Data Privacy
- III.10. Use of Company Resources
- III.11. Anti-Money Laundering

## **IV. Culture of Integrity in Society**

- 1. Environmental Leadership / Sustainability-Oriented Innovation
- 2. Supporting the Community

## **V. Commitment to the Code of Conduct**

- V.1. Speak Up
- V.2. How to Speak Up
- V.3. No Retaliation
- V.4. Non-Compliance corrective actions

## **VI. Positioning the Code of Conduct**

- VI.1. Training and Awareness
- VI.2. Enforcement

# I. Introduction

This Code of Conduct (“Code”) contains specific Corporate Policies that relate to the legal and ethical standards of conduct expected by:

(1) all employees (including officers and directors) of Aramex PJSC and its affiliates (“Aramex”) including ; and

(2) all business partners, customers, suppliers, consultants, franchisees or any party representing or providing Services to Aramex including the extended workforce (for example temps, agents, vendors, and independent contractors) and others who may be temporarily assigned to perform work or services for Aramex (“Business Associates”).

References to Business Associate(s) shall also include reference to the employees of the relevant Business Associate.

The Code provides the legal and ethical framework upon which we must base our decisions and provides guidance and support for carrying out our duties in ways that are compatible with our Values<sup>1</sup> and to uphold the following key principles:

- Honesty
- Openness
- Accountability
- Objectivity
- Selflessness

By adhering to this Code, the CEO aims to lead by example, and encourages all employees and Business Associates to do the same. The Code is organized into five categories containing guiding principles that should be applied by employees and Business Associates to guide behavior across all areas of our activity:

1. Culture of Integrity in the Workplace
2. Culture of Integrity in Doing Business
3. Culture of Integrity in Society
4. Commitment to the Code of Conduct
5. Positioning the Code of Conduct

This Code is a great resource, however, it does not cover every situation that may be faced while on the job, so it is important to use good judgment in everything you do and to ask within the company for help if you are not clear about the right course of action.

<sup>1</sup> Aramex Values: Our People; Corporate Activism; Passion; Integrity; Customer Centricity; Excellence; Entrepreneurship and Innovation.

## II. Culture of Integrity in the Workplace

We commit to providing a supportive and healthy working environment based on fairness and honesty with our employees and expect our Business Associates to do the same, one that rewards achievement, dedication, teamwork, attitude and personal skills that embody the spirit of our Values.

We expect our employees to fulfill their responsibilities and empower themselves to protect and strengthen the workplace environment.

Our organizational culture guides our actions and decision-making process in a way that is rooted in what we consider to be fair, honest, inclusive, and in compliance with local and international laws and regulations that promotes a dignified life for all. Our employees are also expected to read, understand and comply with all policies and procedures applicable to their employment including but not limited to those set out in our Global Employee Handbook.

**We commit, and require our employees and Business Associates to commit, to establishing a work environment based on the following tenets:**

### **1-Non-Discrimination and Equal Employment Opportunities**

All employees and Business Associates should respect diversity and the distinctions of our individuality. As an employer we provide equal opportunities and encourage diversity at every level and stage of employment, including our hiring practices.

Every employee and Business Associates should respect one another and should move towards the company's objectives collectively and collaboratively without regard to race, ethnicity, nationality, religion, gender, relationship status, sexual orientation, age, parental status, disability or health, or any other status protected by the local laws or regulations of where we operate. Discrimination or harassment based on these characteristics will not be tolerated by Aramex.

Where local laws in some countries require certain posts to be held by local nationals, we will apply the merit basis as the next criteria for recruitment. Please refer to our [Diversity, Equity and Inclusion Policy](#) for more information.

## II. Culture of Integrity in the Workplace

### 2- Equitable and Fair Treatment

We commit to ensuring fair treatment for all employees based on merit, including training and advancement opportunities. Merit includes performance, business contribution, expertise, skills, aptitude, and attitude.

We are keen to create, to the extent possible, flexible conditions that are inclusive of and supportive for employees with special requirements, such as employees with physical disabilities.

We continuously strive to provide a work environment that is free of harassment, bullying and abusive conduct—whether physical, verbal or visual and we expect our Business Associates to do the same. We encourage all employees and Business Associates to share their concerns with us on the understanding that we do not tolerate retaliation against anyone who reports a genuine concern.

### 3- Safe, Secure, and Healthy Working Conditions

We are committed and expect our Business Associates to also commit to providing safe and healthy working conditions including at all our premises, and including traffic safety.

Safety and health are paramount in all business decisions and must be an integral part of our culture. Ultimately, our goal is “zero incidents”, and all employees and Business Associates must do their best to promote and achieve this principle.

In cases of national emergencies in locations where we operate, Aramex commits to supporting its employees by taking all possible measures to ensure their safety and assist in maintaining their livelihood, to the extent possible.

Employees should refer to our [Health and Safety Policy](#) or more information.

## II. Culture of Integrity in the Workplace

### 4- Accountability

Accountability is the basis of responsibility.

Corporate reprimand and reaction should always be in proportion to the employee/ Business Associates action or violation and in accordance with company policies and/or our contractual or legal rights.

However, any employee or Business Associate that is aware of a material breach of policy, principle or operating procedure and does not report this to Aramex or to the appropriate internal authority will be considered complicit in the breach.

### 5- Open Communication and Open-Door Policy

We are a “flat” organization committed to promoting free communication across the network, our business operations and supply chain, without barriers..

We are firmly committed to ensuring that any employee or Business Associate using the open-door policy in good faith shall not be subject to retaliation by anyone at Aramex. Acting in good faith means that the employee or Business Associate has a reasonable belief that the information is correct and accurate.

Accordingly, no manager/leader will retaliate by questioning an employee or Business Associate who has reported or used our internal channels to either discuss an idea, voice a concern, or report a violation or suspected violation, nor will the manager/leader take action that adversely affects the employee or Business Associate.

Employees are encouraged to raise any concerns they have through our employee Grievance Policy. Equally, we encourage our Business Associates to openly communicate and engage with us in relation to any suggestion, situation, or concern they might have relating to a violation or potential violation of this Code. Such concerns will be investigated and corrective actions taken where necessary.

Both employees and Business Associates also have the option of reporting their concerns through our Whistleblowing Policy (see Section V below).

## II. Culture of Integrity in the Workplace

### 6. Human and labor rights including anti-slavery and human trafficking

Aramex is committed to enforcing fundamental human and labor rights in its workplace, business operations, supply chain, and in the communities where we operate. Respect and support for human rights is an important part of our culture and Values and is essential for the sustainability of our business.

Aramex takes a zero-tolerance approach to any form of slavery or human trafficking within its business operations and supply chain.

In light of this, we commit and require our employees and Business Associates to commit to respecting human rights standards at all times, including but not limited to the standards, laws, guidance and regulations set out in (1) [our Human and Labor Rights Policy](#) and (2) [our Modern Slavery Statement](#) (collectively “Human Rights Standards”).

We also expect our Business Associates to require their employees and respective supply chains to do the same.

## II. Culture of Integrity in the Workplace

**Notwithstanding the above, in performing their services or obligations towards Aramex, we require our Business Associates to:**

- ensure that their operational policies reflect their responsibility to respect Human Rights Standards, meaning that Business Associates shall:

identify, prevent and mitigate any potential or actual adverse Human Rights Standards impacts resulting from their activities or through their relationships with subcontractors, suppliers or other third parties;

remediate any actual adverse Human Rights Standards impacts which they cause or to which they contribute as soon as is practicable;

- implement due diligence procedures for their own operations and supply chains to identify actual or potential Human Rights Standards impacts and take the necessary steps to prevent, mitigate or remediate any adverse impact;

- Notify Aramex immediately if the Business Associate has been or is the subject of any investigation, inquiry or enforcement proceedings by any government, administrative or regulatory body regarding any offence or alleged offence of or in connection with an adverse Human Rights Standards impact;

- permit Aramex and its third party representatives to inspect their premises and records, and to meet with their personnel to audit the Business Associate's compliance with Human Rights Standards;

Subject to any contractual agreement place, Business Associates may be required to indemnify Aramex against any losses, liabilities, damages, costs and expenses incurred by, or awarded against, Aramex as a result of any breach by a Business Associate of the Human Rights Standards.

## II. Culture of Integrity in the Workplace

### 7- Conflict of Interest

We are committed to avoiding conflicts of interest. A conflict of interest is a situation in which a person or organization is involved in multiple interests or divided loyalties, one of which could possibly impair the motivation or decision-making of that individual or organization.

A conflict of interest may unconsciously influence you, and even the mere appearance of a conflict of interest can cause your actions, reputation and integrity to be questioned.

A conflict of interest may include a related party, which for the purpose of this Code is defined as party that has a pre-existing business relationship or a common interest with Aramex, or is a person related to an Aramex employee (“Related Parties”).

Employees and Related Parties are responsible for identifying and disclosing their own conflicts of interest. If employees are aware of or even suspect that you may have a conflict of interest, you must immediately disclose it in accordance with our Conflict of Interest Policy. Business Associates should disclose any conflict or potential conflict of interest to their Aramex contact.

Disclosing information about conflicts of interest helps ensure that you are not placed in a position of choosing between a personal interest and the interests of Aramex.

It allows us to evaluate the relevant circumstances and facts to determine if an actual conflict exists. Ultimately, it protects our reputation, as well as the reputation of individuals, employees, Business Associates and third parties.

For more details, please refer to Aramex Conflict of Interest Policy: [Aramex Conflict of Interest Policy](#)

## III. Culture of Integrity in Doing Business

We aspire to build a culture of integrity. This culture is evidenced in our relations with our stakeholder groups, which is consistent with our Values and conducive to nurturing a lasting conviction on their part, and of the public at large, that “we do the right thing.”

We fulfill this goal by upholding our Values in dealing with key stakeholder groups: our employees, Business Associates, shareholders, and the community at large.

Third party stakeholders and in particular our Business Associates are fundamental to the vitality and sustainability of our service model and influence the credibility of our brand.

As such, we make an effort to attract and partner with like-cultured, like-minded third parties who seek long-term relationships based on the following factors:

### **1- Compliance with Laws and Regulations**

We conduct business responsibly and in compliance with all laws and regulations related to our operations and business activities in the countries of operation, this includes without limitation all applicable laws, statutes and regulations referred to in this Code, Human Rights Standards as well as those governing protection of personal data and intellectual property rights.

Each employee and Business Associate are responsible for the same level of compliance and for following the legal, professional, and ethical standards that apply to his or her job, function, services and level of responsibility.

We expect our employees and Business Associates not to engage, directly or indirectly, in any form of corruption or bribery and to not grant, offer or promise anything of value to a government official or to a counterparty in the private sector to influence official action or obtain an advantage.

## III. Culture of Integrity in Doing Business

In addition to the local laws of each country in which we are based, we strive to comply with all international laws and efforts (such as European Union, U.K. and U.S. competition and anti-corruption laws) that apply to our operations globally.

Therefore, our employees and directors, and Business Associates shall also respect and comply with such laws.

We always seek partnership with Business Associates who comply with all applicable local and international laws and regulations. As such, we do not tolerate illegal or non-compliant behavior from our Business Associates.

Although our employees are not expected to know the details of every legal requirement applicable to our business in every jurisdiction, they are responsible for understanding the legal requirements applicable to their employment duties and role.

Our employees should understand the regulatory environment in which Aramex operates well enough to know when to seek advice from any appropriate personnel.

Our Business Associates on the other hand, are expected to know the details of every legal requirement applicable to their business worldwide and to the services which they provide to Aramex and to comply with them.

# III. Culture of Integrity in Doing Business

## 2- International Trade and Trade Compliance

Trade compliance is the process by which parties (e.g. manufacturers, wholesalers, shippers, airlines, sea liners, freight forwarders, consignees, etc.) involved in moving tangible and intangible products (i.e. software, information, and all goods) across international borders strive to conform with all export and import laws and regulations. We abide by and will continue to abide by all applicable trade laws and regulations including, but not limited to, the Bureau of Industry and Security (BIS) of the United States' Department of Commerce, the Commerce Control List (CCL) of the Export Administration Regulations (EAR) of the US Department of Commerce, the Office of Foreign Assets Control (OFAC), International Traffic in Arms Regulations (ITAR) Munitions Lists, the European Union export controls and other export controls laws and regulations. Our Business Associates are expected to do the same.

For more information, employees should refer to the Trade Compliance Policy.

## 3- Fair Competition and Anti-Trust

We apply the principles of fair competition based on the quality of services we offer, thereby taking a strong stance against market abuse and we expect our Business Associates to take the same stance. Everyone deserves the right to fair and ethical treatment and to choose their service providers freely.

**We ensure (and require our Business Associates to ensure) that our/their operations comply with applicable anti-competition and anti-trust laws and regulations. Aramex does this by avoiding:**

- Any interaction that will lead to fixing, controlling or maintaining of terms, prices, discounts, allowances, rebates or credits for any customer or supplier.
- Any act that will lead to holding back our services from the overall market or any part of it.
- Attempts to prevent our competitors from entering any of the markets in which we operate.
- Making disparaging remarks about our competitors or use a competitor's confidential information.
- Obtaining or using any information related to our competitors or customer through any illegal methods.

# III. Culture of Integrity in Doing Business

## 4- Anti-Bribery and Corruption

We are committed to implementing fair and ethical business practices, and avoiding corruption of all kinds, including bribery of Government Officials<sup>2</sup> and private (non-government) individuals and entities.

We require our Business Associates to exercise the same commitment.

We strive to comply and require our Business Associates to comply with 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. It is important to keep in mind that what applies to us, must apply to our Business Associates, as well.

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

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 in which Aramex participates.

In case of any doubt about what is expected of employees under the applicable laws or the Anti-Corruption Policy, you must seek guidance from the Compliance or Legal functions.

For more details, please refer to Aramex Anti-Corruption Policy:

[Aramex Anti-Corruption Policy](#)

# III. Culture of Integrity in Doing Business

## 5- Business Gifts and Entertainment

Business gifts, entertainment and hospitality on a modest scale are commonly used to build goodwill and strengthen working relationships. It is a part of business and cannot be avoided. However, Aramex forbids any unethical gifts, entertainment or hospitality, whether in fact or appearance.

Additionally, allowable and ethical gifts, entertainment or hospitality should not be considered as favors with an expected return. Offering or accepting occasional meals, small company souvenirs and tickets to sporting and cultural events may be appropriate in certain circumstances and if they do not exceed US \$50 in value.

Occasionally, it may also be appropriate to accept or provide offers involving travel to business events with business associates, but such offers must be approved in accordance with our Gifts, Entertainment and Hospitality Policy and will be reviewed on a case by case basis.

If offers of gifts, entertainment or hospitality are frequent or of substantial value, they may create the appearance of, or an actual, conflict of interest or illicit payment.

For more details, please refer to Aramex Gift, Entertainment and Hospitality Policy & Aramex Conflict of Interest Policies: [Aramex Gift, Entertainment and Hospitality Policy](#) and [Aramex Conflict of Interest Policy](#)

# III. Culture of Integrity in Doing Business

## 6- Financial Records and Accounting

### 6.1 Insider Trading

Employees or Business Associates who have access to inside information are not permitted to buy or sell any securities based on such information or communicate the same to any third party who then trades in those securities.

Insider information means information that has not yet been made public and which if it were made public would likely have a significant impact on the trading price of the securities.

In many countries, insider trading, or giving inside information to unauthorized parties, is a criminal offence and may result in fines and/or imprisonment.

### 6.2. Financial Records and Accounting

Aramex PJSC is a public shareholding company listed on the Dubai Financial Market (DFM), and subject to strict DFM rules and regulations to protect shareholders' rights and implement good corporate governance practices. This implies a special set of restrictions, precautions and controls which all employees should be aware of and by which they should abide.

The financial integrity of our operations concerns our stakeholders, which include shareholders, government authorities, Business Associates and employees.

Aramex's financial reputation is affected by our actual and perceived integrity by all stakeholders.

Our reputation for financial integrity depends on our consistency in providing complete, timely and accurate payments, billing and reporting, and keeping accurate and complete records at all times.

All employees and in certain cases our Business Associates have a role in ensuring the integrity of our financial transactions, records, and financial and non-financial reporting

# III. Culture of Integrity in Doing Business

## 7- Third Party Due Diligence

Engaging third parties is a necessary part of our business. They provide materials and services we need to build our world-class products, represent our brand in global markets and reach new customers.

Essentially, these third parties (who may become Business Associates) are an extension of Aramex, and any corrupt/illegal acts they carry out while conducting business for us can create liability for our company. Therefore, we must only choose Business Associates that we feel comfortable with in representing our brand and Values.

Building long-term relationships with Business Associates based on transparency and mutual respect are key values for Aramex.

We actively seek out and favor Business Associates who share our values and our ethical commitment while also having the right to end the relationship with those of them who do not.

In support of this, we take a number of steps when engaging third parties including a Know your Supplier process, third party risk assessments, due diligence, contractual clauses in our Business Association documentation and risk based auditing.

We keep our third party relationships and our internal processes for managing third party relationships under continuous review, evaluating whether any areas can be updated and improved.

For more details, please refer to Aramex Third Party Due Diligence Policy: [Aramex Third Party Due Diligence Policy](#)

<sup>2</sup> Government Officials is 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.

# III. Culture of Integrity in Doing Business

## 8- Confidential Information and Intellectual Property

Information that is deemed confidential should be protected from disclosure both within and outside Aramex. Employees and Business Associates must take precautions to guard our proprietary information from disclosure to competitors and other unauthorized third parties. In addition to safeguarding Aramex confidential information, employees must also take care to protect the confidential information of third parties (e.g., including Business Associates) which comes into their possession by reason of their positions within Aramex.

Confidential information includes software developed in-house or by third parties, personal data of employees, customers and Business Associates and , as well as proprietary information concerning methodologies, processes, business plans, customer databases and pricing information, and new concepts.

This information is of a competitive nature and important for Aramex's success in the marketplace. Leakage of confidential information may impair our competitiveness.

Every employee and Business Associate has an obligation to protect Aramex's confidential information and take all necessary precautions to that end.

Aramex's intellectual property, which includes the Aramex name, trademarks, logos, customer database, software, is a valuable asset for our continued success and as such should be protected from unauthorized use by third parties.

Any knowledge of infringement or potential infringement of Aramex's intellectual property rights should be brought to the attention of the Legal function immediately.

# III. Culture of Integrity in Doing Business

## 9- Data Privacy

We respect an individual's right to privacy and strive to comply with applicable data privacy laws.

Personal data is any information that can, directly or indirectly, identify an individual and may include name, physical address, telephone number, email addresses, financial data, etc.

Personal information should be collected, processed, and used in accordance with the applicable laws and the Aramex Master Privacy Policy.

We expect every employee and Business Associate to respect and protect personal data, especially as related to customers, employees, and shareholders.

## 10- Use of Company Resources

Employees' working hours at Aramex shall be dedicated to the pursuit of Aramex's interest, protecting its assets and making reasonable use of its resources.

We require our Business Associates to comply with the applicable working time laws and regulations in relation to their employees together with the Human Rights Standards and their contractual/ legal duties towards Aramex.

We understand that our employees may need to, from time-to-time, address personal matters that cannot be handled outside of normal work hours. Employees should comply with our Global and Local HR policies and procedures in such circumstances, available on the HR Hub, as well as their contracts of employment.

Should an employee or Business Associate be authorized to use Aramex's resources, such use must not be excessive, for personal gain, for illegal purposes, or otherwise abused.

# III. Culture of Integrity in Doing Business

## 11- Anti-Money Laundering

We are committed to avoiding direct or indirect illegal activities and corruption of all kinds, including money laundering. We abide by, and will continue to abide by all applicable, including local, anti-money laundering laws in every country in which we operate.

We require our Business Associates and employees to do the same.

Money laundering is the process of taking the proceeds of a criminal activity and making them appear legal.

In other words, it is the process by which criminally obtained money or other assets (criminal property) are exchanged for clean money or other assets with no obvious link to their criminal origins.

Money laundering may be used by terrorist organizations, drug dealers, parties engaged in bribery, human trafficking, and by anyone who receives money through illegal activities.

Some countries in which we operate may have stricter laws than those mentioned in our Anti-Money Laundering Policy.

A copy of our Anti-Money Laundering Policy will be made available where deemed appropriate for Business Associates upon request. As a general rule, we follow the most stringent law, regulation or policy applicable to our business in these countries.

## IV. Culture of Integrity in Society

We believe that the sustainability of our business is contingent on the sustainable development of the communities we serve.

For this reason, we are committed to acting as a responsible corporate citizen in every jurisdiction in which Aramex conducts business, and to contributing to the long-term development of these communities.

In particular, we respect the natural environment and refrain from or limit, to whatever extent possible, any practices that may harm it in the course of doing business.

We commit to:

- Environmental leadership and sustainability-oriented innovation.
- Supporting the global community.

### **1- Environmental Leadership / Sustainability-Oriented Innovation**

As a company in the transportation solutions and logistics business, our operation can have a significant impact on the environment, including contributing to climate change. Protecting the environment and addressing climate change has become one of the most important global issues and is an emerging issue in many developing economies including those in the Middle East.

We take a precautionary approach to environmental challenges, emphasizing respect for the environment. All employees and Business Associates are responsible for pollution prevention and for compliance with applicable environmental laws and regulations in the course of making business decisions.

## IV. Culture of Integrity in Society

But far beyond compliance, our goal is to aggressively reduce our environmental impact and to be a carbon-neutral company in the shortest feasible time.

We want the Aramex brand to be globally recognized as closely associated with environmental leadership, as we believe this will be a crucial competitive advantage.

We aim to encourage and integrate new technologies and offer new types of green services that will dramatically reduce our negative environmental impacts. Every employee is responsible for contributing to our performance improvements in this field, including ensuring the effectiveness and continuous improvement of any environmental management systems implemented by us.

Examples of priority areas for improving our the carbon dioxide emissions and other harmful emissions from our fleet of vehicles, being more efficient in the use of environmental resources such as energy, water, and paper, and reducing our impact on traffic and congestion in key markets.

### 2- Supporting the Community

We are committed to supporting and improving the lives of members of the communities in which we operate by developing and funding projects that enhance their welfare with a view towards sustainability. In that spirit, we expect our managers to promote the sense of community service among their teams.

Community partnerships and initiatives are decided on with a collaborative approach, which should include community stakeholders in decision-making processes to ensure their needs are being met.

Our employees are supported and encouraged to volunteer in these initiatives to deepen their connection to the community and help maximize our positive community impacts: we are proud to provide employees with paid time off to engage in volunteering under our employee Volunteering Policy.

# V. Commitment to the Code of Conduct

## 1- Speak Up

We are proud of our employees' and Business Associates' strong commitment to our culture in conducting business and trust our employees and our Business Associates to support this Code of Conduct in every manner.

Aramex focuses on integrity in its business dealings and compliance with laws and its Values because it is the right thing to do and we expect our employees and Business Associates to do the same.

Employees or Business Associates who need clarifications regarding the application of the Code, who know of an ethical or compliance issue, or who have a reasonable belief that non-compliance issues are occurring at Aramex or its Business Associates are encouraged to come forward. We cannot address questions or concerns unless we are aware of them.

## 2- How to Speak up

Our culture of integrity and open-door policy allows employees to raise their concerns and speak directly with their individual manager or supervisor, or with HR.

In fact, part of the role of our managers, supervisors and HR team is to listen to employees and understand and investigate their concerns as necessary.

In an effort to enhance the effectiveness of the speaking up process, we provide our employees with two "official" channels to raise their concerns (as well as operating an open door policy): (1) through our Grievance Policy and (2) through our Whistleblowing Policy.

Our Whistleblowing Policy is also available to all third parties (including Business Associates) and Whistleblowing concerns can be raised via the following e-mail: [Whistleblowing@aramex.com](mailto:Whistleblowing@aramex.com)

All reported incidents are taken seriously and channeled for proper investigations. We owe it to our culture to do the right thing and stop wrongdoing in accordance with our Code.

For more details, please refer to Aramex Whistleblowing Policy: [Aramex Whistleblowing Policy](#)

# V. Commitment to the Code of Conduct

## 3- No Retaliation

In no event will an employee, Business Associate, or third party who makes a report through our Grievance or Whistleblowing systems be subject to retaliation.

Any person, regardless of their position, who engages in retaliatory behavior will be subject to disciplinary or corrective action. Provided that reports are made with a reasonable belief that non-compliance issues are occurring, no action will be taken against an employee raising a concern that eventually proves to be inaccurate.

Abusive accusations will not be tolerated. We expect every employee and Business Associate to support this Code and encourage every employee, third party, and Business Associate to speak up for what's right when something is wrong.

## 4- Non-Compliance corrective actions:

In the case of non-compliance with this Code, Aramex shall have the right and/or obligation to take corrective action against its employees and Business Associates, including but not limited to one or more of the following actions:

- Disciplinary action such as warnings (verbal and/or written).
- Termination of employment/services.
- Financial penalties.
- Declaration to regulators.
- Auditing of a Business Associates activities.
- Legal action and/or lawsuits.

The level and type of corrective action is driven by nature, scope, intent and materiality of potential consequences of the non-compliance as well as Aramex's legal and contractual rights.

# VI. Positioning the Code of Conduct

## 1- Training and Awareness

In order to ensure understanding and compliance, all Aramex employees will receive an initial training on our Code of Conduct, followed by an annual online training as a refresher to ensure compliance with the Code, and applicable laws and regulations.

Employees should review their behavior in light of this Code and determine whether changes are required. At the same time, managers and supervisors should actively discuss this Code, monitor compliance and act as positive role models.

In certain instances, we may also require our Business Associates to undergo training and awareness on the Code.

## 2- Enforcement

Violations of the Code will not be tolerated. Employees and Business Associates are encouraged to speak up when behavior inconsistent with the Code is observed and managers are expected to deal with such reports and, if necessary, to refer them to the appropriate member of management and/or Compliance Officer.

Violations can lead to corrective action consistent with Section V above in line with applicable laws and regulations as well as any internal Aramex policies and contractual rights.

### **Independent Risk and Compliance Function**

At Aramex there is an independent function to manage and oversee the deployment of the Code and the accompanying related policies. The Risk and Compliance function will review this Code on a regular basis and consult with the Legal function to decide on amendments, as appropriate.

# VI. Positioning the Code of Conduct

The Risk and Compliance function is responsible for:

- Identifying the organization's risks in the domain of ethics and compliance and proposing mitigating actions.
- Developing an effective communication and training program to inform and educate employees, managers and where applicable Business Associates about the Code of Conduct and to address identified risks.
- Supporting and helping employees ,and where applicable, Business Associates to resolve questions and issues relating to ethics and compliance.
- Investigating, either alone or with the assistance of other functions, all reports that have been brought to their attention.
- Making practical proposals to prevent violations and minimize damage to Aramex, its employees or third parties (including Business Associates).
- Providing input to management on appropriate disciplinary actions.
- Proactively monitoring and reporting on the effectiveness of the ethics and compliance program, with a view towards continual heightening the commitment to integrity within the organization.

## Document History

Code previous version: 2019

Code updated version: 2021

Company reported year: 2021