

Corporate Compliance Policies

COM 1151 - (C) Aramex Conflict of Interest Policy





1. POLICY PURPOSE

The purpose of the Aramex Conflict of Interest Policy (“Policy”) is to give clear instructions to Aramex employees and other Related Parties¹ on identifying, avoiding, and disclosing conflicts of interest.

This Policy:

- Describes the various forms of conflicts of interest.
- Illustrates situations where conflicts of interest 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.

Just because a conflict of interest exists does not necessarily mean that it is unacceptable and cannot be resolved. Often, these situations cannot be avoided so it is important to recognize when they do exist and know how to deal with them.

2. APPLICABILITY

This Policy applies to all employees of Aramex and its worldwide Related Parties, 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 conflict of interest. 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 take part in. 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.



4. RESPONSIBILITY (CALL FOR ACTION)

As employees and Related Parties of Aramex, we are all responsible to uphold the company values and conducting 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 or those that may be viewed as involving a conflict of interest.
- 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.
- The Human Resources Department; or
- Direct Manager (unless the nature of the issue makes doing so inadvisable).

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