

Corporate Compliance Policies

COM 1151 - (B) Aramex Gifts, Entertainment and Hospitality Policy





1. POLICY PURPOSE

The purpose of the Aramex Gifts, Entertainment and Hospitality Policy (“Policy”) is to give clear instructions to Aramex employees and other Related Parties¹ when receiving or offering gifts, entertainment or hospitality.

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

Offering or accepting occasional meals, small company souvenirs and tickets to sporting and cultural events may be appropriate in certain circumstances.

Occasionally, it may also be appropriate to accept or provide offers involving travel to business events with business associates. However, 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.

This Policy:

- Advises the laws applicable to our business worldwide, as well as the importance of complying with these laws.
- Describes acceptable and non-acceptable gifts, entertainment, and hospitality.
- Illustrates situations where unethical situations might occur and guidance on how to handle them; and
- Details the avenues of support to be used for reporting concerns and gaining additional guidance.

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 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).