

Corporate Compliance Policies

COM 1151 - (J) Aramex Third Party Due Diligence Policy





1. POLICY AND PURPOSE STATEMENT

The purpose of the Aramex Third Party¹ and Due Diligence Policy “Policy” is to give clear instructions to Aramex employees and other related parties² on knowing our suppliers and third parties and performing appropriate due diligences.

This Policy:

- Describes the various stages of Aramex’s due diligence process.
- Illustrates situations where a red flag may exist when dealing with third parties; 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 world-wide related parties, including officers, directors, full-timers, part-timers, contract and temporary employees that are part of the process of selecting, evaluating, or any part of the decision making related to third parties.

3. APPLICABLE LAWS

Aramex is committed to fair and ethical business practices and avoiding corruption of all kinds, including dealing with unethical third parties. We will abide by all applicable laws, including, but not limited to, 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”).

As a general rule, we follow the most stringent law, regulation or policy applicable to our business in those 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 Policy, you must seek guidance of the Compliance or Legal Departments.

¹ **Third Party:** For the purposes of this Policy, all of our suppliers, franchisees, outsources service providers, agents, or any party we contract to do business with are considered as third parties.

² **Related Parties:** subsidiaries, affiliates, joint ventures, franchisees, agents, consultants, contractors, sub-contractors and anyone else who does work 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'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)