# **Corporate Compliance Policies**

COM 1151 - (I) Aramex Whistleblowing Policy





## 1. POLICY PURPOSE

This policy is intended to remind employees and Related Parties<sup>1</sup> of their responsibilities to uphold Aramex's values and to conduct business ethically, with integrity and honesty in accordance with the Code of Conduct.

Part of this responsibility includes an obligation to report suspected cases of non-compliance with the Code as well as concerns of wrongdoing or malpractice, without fear of retaliation.

The purpose of this Policy is to:

- Encourage you to feel confident in reporting concerns.
- Provide safe, simple and globally consistent avenues for you to raise those concerns and receive feedback on any action taken in relation to them.
- Reassure you that any retaliation suffered by you because you have raised a genuine concern, will not be tolerated by the Company.

### 2. APPLICABILITY

This policy is non-contractual and is subject to review and change from time to time.

This policy applies to all employees of Aramex and its world-wide Related Parties. It also applies to separated employees, who are encouraged to raise any concerns under this policy with Human Resources as part of the exit process.

This policy applies to all aspects of work, commercial transactions, activities and business endeavors.

#### **3.** APPLICABLE LAWS

We are committed to fair and ethical business practices and avoiding corruption of all kinds and we will investigate reported potential violations. We will abide by all applicable laws, including relevant local and international laws.

The laws relating to whistleblowing vary from country to country. Therefore, this policy is subject to the local whistleblowing legislation at the whistleblower's place of work. In the case of any inconsistencies between this policy and the relevant law, the law will take precedence.

<sup>&</sup>lt;sup>1</sup> Related Parties: Aramex subsidiaries, affiliates, stakeholders, customers, joint ventures, business partners, franchisees, consultants, contractors, sub-contractors, directors, officers, and anyone else who works for or acts on behalf of Aramex (or who has worked for or acted on behalf of Aramex).

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#### 4. REPORTING ARRANGEMENTS AND ANONYMITY

If you witness any potential violations, you must speak with us. We operate under a no retaliation policy, which means that we will never retaliate against or subject to unfavorable treatment, anyone who reports a genuine concern to us.

Potential violations may be reported in writing by emailing *Whistleblowing@aramex.com*. You have the option of reporting your concerns anonymously by using a non-identifiable email address. In any case, your report will be treated with the highest level of confidentiality and we will use our best efforts to ensure that your identity is not disclosed. In certain countries, there are additional reporting mechanisms, which should be discussed with the Risk and Compliance Department.

To assist us in assessing or investigating your concerns, it would be helpful if you could provide the following as a minimum when submitting your report:

- Date(s) of incident(s),
- Type of incident (referring to one of the circumstances listed in Section 5, if possible),
- Description of incident(s)/details of concerns,
- Where the incident occurred, and
- Who was involved in the incident?

Additionally, you can always report an incident and/or seek guidance from someone in the following departments by email, phone, or face to face:

- Corporate Risk and Compliance Department.
- Legal Department.
- Human Resources Department; or
- Your direct Manager (unless the nature of your concern makes you uncomfortable or doing so is inappropriate, for example because the concern relates to them).

It is important to remember that false allegations may lead to appropriate disciplinary action.