

Aramex Code of Conduct

Message from the Group 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 when dealing with each other within Aramex, and externally, when dealing with the rest of the world.

As a global player in the industry, we all have 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 of Conduct whenever we face an ethical issue, including speaking up when we see behavior that compromises the principles of our Code of Conduct.

In-line with our mission to connect people and businesses, reliably and responsibly, I am the first person to adhere to our Code of Conduct, and it is imperative that we all do so. By upholding the highest level of integrity, we send a clear message to our stakeholders about our strong commitment to ethical behaviour. This enables us to simultaneously 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.

Othman Aljeda
Group Chief Executive
Officer Aramex PJSC

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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"); 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 Values¹ and to uphold the following key principles:

- Honesty
- Openness
- Accountability
- Objectivity
- Selflessness

All employees are required to adhere to this Code. The Code is organized into five categories containing guiding principles that apply to all employees and Business Associates across all areas of our activity:

- i. Culture of Integrity in the Workplace
- ii. Culture of Integrity in Doing Business
- iii. Culture of Integrity in Society
- iv. Commitment to the Code of Conduct
- v. 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 vital to use good judgment in everything you do and to ask for clarification from a Compliance, HR or Legal team member if you are not clear about the right course of action.

¹ Aramex Values: "Our People; Corporate Activism; Passion; Integrity; Customer Centricity; Excellence; Entrepreneurship and Innovation".

II. Culture of Integrity in the Workplace

We are committed to providing a respectful and healthy working environment based on fairness and honesty, that rewards achievement, dedication and teamwork, that embodies the spirit of our values to our employees. We expect our Business Associates to do the same.

Furthermore, we expect **our employees to fulfill their responsibilities** while they are empowered 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. 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 are committed, and require our employees and Business Associates to commit, to **establishing a work environment based on the following pillars:**

1. Non-Discrimination and Equal Employment Opportunities

All employees and Business Associates are expected to be respectful to each other, working towards achieving Aramex's objectives, collectively and collaboratively, without regard to race, ethnicity, nationality, religion, gender, relationship status, sexual orientation, age, parental status, disability, health, or any other status protected by the local laws or regulations where we operate.

As an employer, Aramex is committed to providing equal opportunities, and we encourage diversity at every level and stage of employment, including our recruitment practices.

We will not tolerate any form of discrimination, bullying or harassment (including sexual harassment) in any aspect of employment, including recruitment, selection, placement, training and development, performance management, promotion, compensation, benefits, disciplinary measures, and termination. This applies both inside and outside the workplace (when dealing with customers, suppliers, other work-related contacts, or when wearing a work uniform), and on work-related trips or events including social events and gatherings.

Where local laws in some countries may require certain positions to be held by local nationals, our standards for capability, experience and culture will continue to apply for recruitment purposes. Please refer to our [Recruitment Policy and Diversity, Equality and Inclusion Policy](#) for more information.

II. Culture of Integrity in the Workplace

2. Equal and Fair Treatment

We are committed 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 hire and develop the best people who showcase our values. We believe that every employee has a unique skill and talent that can shape and transform our business every day. We support a culture that respects the distinctions of our individuality.

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.

Please refer to our [Grievance Policy](#) for more information.

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 traffic safety, across all our premises.

Safety and health are paramount in all business decisions and are 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 goal.

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](#) for 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 an employee's / Business Associate's action or violation, and in accordance with Aramex policies and/or our contractual or legal rights.

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 equally as 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 to report a genuine concern to us in good faith shall not be subject to retaliation or unfavourable treatment by anyone at Aramex. Acting in good faith means that an 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 will be taken where necessary.

Both employees and Business Associates also have the option of reporting their concerns and potential violations through our Whistleblowing Policy (refer to [Section IV: Commitment to the Code](#) below).

II. Culture of Integrity in the Workplace

6. Human and labor rights including anti-slavery & 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 are committed to, 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.

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 Business Associates shall:
 - identify, prevent, and mitigate any potential or actual adverse breach of Human Rights Standards resulting from their activities or through their relationships with subcontractors, suppliers or other third parties.
 - remediate any actual adverse breach of Human Rights Standards 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 breaches of Human Rights Standards, and take the necessary steps to prevent, mitigate and/or remediate any adverse impact.
- Notify Aramex immediately if a 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, concerning a breach of Human Rights Standards.

II. Culture of Integrity in the Workplace

- 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 in place, a 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 of the Human Rights Standards by a Business Associate.

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 anyone, and even the mere appearance of a conflict of interest can cause one's actions, reputation and integrity to be questioned or tested.

A conflict of interest may include a related party, which for the purpose of this Code is defined as a 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 they may have a conflict of interest, they must immediately disclose it in accordance with Aramex 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 employees and Business Associates are not placed in a position of choosing between a personal interest and the interests of Aramex.

Disclosure allows Aramex to evaluate all of 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](#)

III. Culture of Integrity in Doing Business

Introduction

We aspire to build a **culture of integrity**. This culture is evidenced in our relationships with our stakeholder groups, which are 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 third parties with common values who seek long-term relationships based on the **following factors**:

1. Compliance with Laws and Regulations

Aramex conducts its business in compliance with applicable laws and regulations related to our business activities in the countries of operation, including the various laws, statutes and regulations referenced in this Code, Human Rights Standards and concerning the protection of personal data.

Each employee and Business Associate is 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.

Furthermore, we strive to comply with all international laws and efforts that apply to our operations globally (including but not limited to: the European Union, U.K. and U.S. competition and anti-corruption laws). We therefore expect our employees and Business Associates to not, directly or indirectly, engage in any form of corruption or bribery including not granting, offering or promising anything of value to a government official or a counterparty in the private sector to influence official action or obtain an advantage.

Aramex seeks partnerships with Business Associates compliant with applicable local and international laws and regulations, and as such, we do not tolerate illegal or non-compliant behavior from our Business Associates.

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While 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 respective duties and role. Our employees are expected to 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 and comply with all legal requirements applicable to their business worldwide and the services they provide to Aramex.

2. Compliance with Economic Sanctions, Import and Export Laws.

Aramex offers services all over the world. It is our responsibility to observe all national and international laws that apply to our global business operations. Many countries regulate exports and trade activities with other countries, entities, and individuals. Complying with international trade laws and regulations is a challenge, and it is everybody's responsibility. Violating these laws can have serious penalties on all parties involved, including weighty fines and/or imprisonment.

Accordingly, all Aramex Business Associates are expected to understand and comply with all export controls and trade restrictions established by various laws, including but not limited to:

- **EAR:** The Export Administration Regulations
- **US Sanctions (OFAC):** administered by the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") against targeted countries, regimes, individuals, and entities.
- **Arms Export Control Act & ITAR:** (International Traffic in Arms Regulations) and any sanctions administered by the U.S. Department of State pursuant to various statutes and Executive Orders.
- **EU sanctions** laws and regulations.
- **UK HM Treasury financial sanctions:** through its Office of Financial Sanctions Implementation (OFSI) - UK sanctions laws and regulations.
- **Other laws and regulations:** regarding the export, re-export, transfer, or services, and technologies applicable to Aramex's operations.

For more information, employees should refer to the

III. Culture of Integrity in Doing Business

3. Fair Competition and Anti-Trust

We apply the principle of fair competition based on the quality of services we offer, thereby taking a strong stance against market abuse. 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 of a competitor's confidential information.
- Obtaining or using any information related to our competitors or customers through any illegal methods.

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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 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,
- **U.K. Bribery Act (UKBA)**,
- **United Nations Convention against Corruption (UNCAC)** and
- **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 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](#)

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. We recognise that this is a part of business that 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, subject always to any such gift not **exceeding USD \$100 in value**.

Occasionally, it may be appropriate to accept or provide offers involving travel to business events with business associates. 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 a substantial value, they may create the appearance of, or be an actual, bribe, conflict of interest or illicit payment.

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

III. Culture of Integrity in Doing Business

6. Financial Records and Accounting

6.1 Insider Trading

An insider is any individual who has access to material and confidential information of Aramex that is unavailable to others.

Insider information is any information, event, decision, or incident that could affect the price of Aramex shares, the movement or volume of its trading, or the decisions of an investor in relation to trading in Aramex shares.

Insiders shall hold themselves to the highest standards of good conduct and ethics in keeping confidential all information provided to them, and they shall not deal in the shares of Aramex on the basis of insider information. Insiders must notify Aramex of any trade carried out on its securities before and after trading.

Insiders may trade in Aramex shares outside of the defined blackout periods, if this is in accordance with the Transparency and Disclosure Rules published by the Dubai Financial Market (DFM). For more details, please refer to Aramex Insider Trading Policy ([PDF](#) [GOV 1051 - \(B\) Insiders Trading Policy.pdf](#))

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 the actual and perceived integrity of all stakeholders.

Our reputation for financial integrity depends on ensuring the correctness and completeness of the financial reports, in addition to demonstrating responsibility and capacity to meet Aramex's obligations.

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

6.3 Disclosure of Financial Information

All employees are expected to refrain from sharing any financial information that is not publicly available with external parties and/or unauthorized internal parties.

It is essential that all employees of Aramex understand their personal responsibilities, and do not speak about financials and material information on behalf of Aramex with any external parties, unless they are an approved spokesperson.

In case non-public material information is discussed or inadvertently disclosed, the Aramex spokesperson is required to seek immediate advice from the Investor Relations team, as per the guidelines within [Aramex's Investor Relations Policy](#)

[<https://www.aramex.com/us/en/investor-relations/investors-services-and-contact>].

III. Culture of Integrity in Doing Business

7. Third Party Due Diligence

Engaging third parties is a necessary part of our business. They provide the 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 favour 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 the: [Aramex Third Party Due Diligence Policy](#)

² *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's 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. An employee's obligation to maintain confidentiality remains even after their employment has ended. Equally, all Business Associates are bound by their confidentiality undertakings, even on termination of our relationship with them.

Confidential information means information of a confidential or secret nature, trade secrets or commercially sensitive information relating to the business or financial affairs of Aramex, a Business Associate or any other person having dealings with the Aramex. Confidential information shall include (but is not limited to): software developed in-house or by third parties, personal data of employees, customers and Business Associates, 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 Department, 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.

Employees should refer to the [Aramex Master Privacy Policy](#) and Section 6 (Information Security, Data Protection and Privacy) of the [Global Employee Handbook](#) for more information.

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, from time-to-time, to 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 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

Introduction

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 being a responsible corporate citizen in every jurisdiction in which Aramex conducts business, and to creating value and positive impact for our community and contributing to its long-term development.

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 Stewardship and Climate Change Mitigation
- Youth Education and Empowerment
- Entrepreneurship

1. Environmental Stewardship and Climate Change Mitigation

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.

Our track record, commitments, and progress towards being an environmentally conscious company are bolstered by more than 40 years of experience and steadfast effort toward safeguarding natural capital, and minimizing and mitigating our negative impacts. By measuring our green house gas (GHG) emissions according to best practices and global standards over the last 10+ years, we have been able to understand our footprint and make evidence-based efforts toward its reduction.

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

In addition to ensuring our compliance with national and international goals and regulations, 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.

Aramex's Board is engaged throughout the setting of strategy and through the budgeting process, as environmental concerns, efforts, and sustainability goals and activities are discussed and approved by the budget committee. Our sustainability efforts are in-line with our goal to nurture and develop our social and relationship capital and safeguard our natural capital, while also ensuring we mitigate any negative environmental impacts associated with our operations, especially our emissions.

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.

As part of our efforts to safeguard our natural capital, we have implemented several initiatives to reduce GHG emissions, increase energy efficiency, reduce material use and waste, and provide our customers with alternative and sustainable packaging materials. We continue expanding our investment in renewable energy such as solar to power our facilities, and continue expanding our fleet of low or emissions-free vehicles. We are also working across our supply chain to mitigate 'Scope 3' of our emissions (i.e. indirect emissions not created by our value chain).

For more details, please refer to the following Aramex Policies:

- [environmental-stewardship-policy](#)
- [sustainable-water-policy](#)
- [social-responsibility-policy](#)

IV. Culture of Integrity in Society

2. Youth Education and Empowerment

We believe that to achieve a sustainable future, we need to support the education and empowerment of our youth. As they shape the world we live in, we want to ensure they are equipped with the necessary skills and expertise to make a positive impact within their communities and beyond.

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](#).

In accordance with our [Charitable Donations and Sponsorships Policy](#), we will keep supporting community development in collaboration with different stakeholders, including non-governmental organizations and local communities.

3. Entrepreneurship

Our focus on entrepreneurship stems from our own entrepreneurial journey which started over 40 years ago. From that journey, we understand the ability of startups and small and medium size enterprises (SMEs) to transform economies, drive innovation, and create value.

To that end, we focus on supporting entrepreneurs and SMEs along their journey as part of our social program, and hence developed the SME program that has since been expanded on and integrated into our business operations.

V. Commitment to the Code of Conduct

1. Speak Up

We are proud of our employees' and Business Associates' strong commitment to our culture when conducting business, and trust our employees and our Business Associates to support this Code 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 at one of 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 in a confidential manner, 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): through our [Grievance Policy](#) and through our Whistleblowing Policy ([Aramex whistleblowing Policy](#))

Aramex Whistleblowing Policy is also available to all third parties (including Business Associates) and Whistleblowing concerns can be raised via the following means:

1- Case Management System "Lighthouse"

Via logging into www.lighthouse-services.com/aramex

2- Hotline "Toll-Free" Telephone

The Toll-Free Telephone includes direct dials for certain locations and a general number for other locations.

V. Commitment to the Code of Conduct

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.

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 genuine 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 Associate's activities.
- Legal action and/or lawsuits.

The level and type of corrective action is driven by the 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, 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 that is 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.

3. Review

The Risk and Compliance function will review this Code on a regular basis and consult with the legal function to decide on any amendments and updates which may be needed, as appropriate.

Document History

Policy Content Owner	Chief Risk & Compliance Officer (CRCO)
Effective Date of the Policy	1 January 2019
Policy last updated	August 2023
Main policy statement	Ethical framework upon which provides guidance and support for carrying out our duties in ways that are compatible with our Values
Eligibility and Scope	All employees at all grades and levels, and all Business Associates