



**COM 1151 - (A) Aramex  
Anti-Corruption Policy -  
External**



## Policy Purpose

The nature of our business and geographical spread often requires interactions with various officials in the public and private sectors around the world. Our Code of Conduct, Applicable Anti-Corruption Laws “Applicable Laws” and this Anti-Corruption Policy “Policy” establish certain limits on these interactions.

This Policy is drafted to provide awareness about Aramex’s stance of zero tolerance for corruption and commitment to fair and ethical business practices to avoid violations of the Applicable Laws. Such violations might lead to severe penalties, fines or reputation damage; therefore, it is vital that we not only understand the importance of this Policy but comply with it in our daily transactions.

This Policy:

- Advises the laws applicable to our business worldwide, as well as the importance of complying with them.
- Describes the various forms of corruption.
- Illustrates situations where corruption might arise and the recommended course of action.
- Details avenues of support to be used for reporting compliance concerns and gaining additional guidance.

## Applicability

This Policy applies to all employees of Aramex and its worldwide Related Parties <sup>1</sup>, including officers, directors, full-timers, part-timers, contract and temporary employees. It covers all aspects of work, transactions, activities and business endeavors.

## Applicable Laws

Aramex is committed to fair and ethical business practices and avoiding corruption of all kinds, including bribery of Government Officials<sup>2</sup> 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

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<sup>1</sup> **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.

<sup>2</sup> **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.



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.

### 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.

### Reporting Arrangements and Anonymity

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

Potential violations could be reported anonymously via methods provided in **Appendix I** (end of the document).

### What is Corruption?

**Corruption** is the misuse of a position of trust to gain an unfair business or personal advantage.

It usually takes place through acts of **bribery**, which includes offering, promising, giving, accepting, or authorizing of a payment or anything of value as an inducement for action that is illegal or a breach of trust.

A bribe, therefore, is that very inducement or reward of anything of value that is offered, promised, given or accepted to gain that unfair business or personal advantage

Bribes can take many **forms**, including: (but not limited to)

- Gifts (exceeding nominal/low value).
- Entertainment and Hospitality (lavish meals, alcohol, hotel accommodations, shows, sporting events or other high-price events).
- Travel (plane tickets, ticket upgrades or trip expenses).
- Facilitation Payments<sup>3</sup>.
- Kickbacks<sup>4</sup>.
- Favorable Contracts.

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<sup>3</sup> **Facilitation Payments:** offers or payments made to a government official to expedite or secure the performance of a routine governmental action or administrative process.

<sup>4</sup> **Kickbacks:** is a form of negotiated bribery in which a commission is paid to the bribe-taker in exchange for services rendered.



- Business Opportunities.
- Sponsorships.
- Charitable or Political Contributions.
- Stock Options.

Bribes can be provided or received in many **ways**, including:

- **Directly:** a customer requesting an expensive dinner, drinks, gift or a cash payment as a necessary precondition to discuss potential business for Aramex (same case applies if somebody did the same on behalf of Aramex).
- **Indirectly:** a government official asking for a cash payment through a third party (i.e. consultant or agent) before granting Aramex the right to do business in a certain area or a specific way.
- **Kickbacks:** an agent offering commission on any profit they gain from selling Aramex's services in exchange for Aramex choosing them over other agents, or a customer requesting commission on Aramex's sales in exchange of ensuring Aramex is selected over other suppliers (same case applies if somebody did the same on behalf of Aramex).



### Values Checkpoint!

**Scenario:**

I understand Aramex's commitment to abide by high ethical standards and prevent bribery or other corrupt acts, but what if this Policy causes me to lose business for the company and my sales target?

**Response:**

At Aramex, *Doing the Right Thing* is one of our most important values. We urge you to do the right thing, rather than engaging in an improper and potentially illegal behavior just to gain business opportunities, prevent the company from losing business or achieve your sales target.

### Red Flags

A red flag is a fact, event, or set of circumstances, or other information that may indicate a potential compliance concern for illegal or unethical business conduct.

While performing day-to-day work, Aramex employees and related parties may come across red flags that should trigger concern and appropriate action. While the following examples are not exhaustive and may not in themselves constitute or indicate a violation of this Policy or the Applicable Laws, they may be indicators of potential current or future non-compliance.

Red Flag **Examples:**

- Training, travel or entertainment costs exceeding reasonable levels.
- Substantial gifts are requested directly/indirectly.
- Expense claims or petty cash payments are made without sufficient documentation and evidence.
- Something of significant value is requested in return for inclusion on a tender or before a contract is awarded.



- A commission payment is requested for carrying out normal work.
- Requests for travel including family members.
- Requests for payments to charities in exchange for business contracts.
- Tasks are done more quickly or efficiently than usual.
- Receiving unusual or unexplained preferential treatment in regulatory or administrative processes.
- Unjustifiable requests that payments be made to multiple accounts.
- Refusal to properly follow accounting procedures/policies.
- Inaccurate, inflated, suspicious or unusual invoices.
- Engaging incompetent suppliers/consultants/agents; lacking the staff, facilities, or expertise to perform substantial work.
- Consultants "consulting agreements" include vaguely described services.
- Requests that do not seem in the best interest of our business.
- An individual who resists oversight or avoids sharing responsibilities with others.
- A governmental employee (for example, a customs employee) insists on using a specific vendor for supplies or subcontracting.
- Payments in a country (jurisdiction) are not related to the transaction.
- Suspicious or inadequate termination of a business relationship.



**Values Checkpoint!**

**Scenario:**

I handle an account for a customer who told me a new vendor is offering the same price of Aramex but throwing in an additional annual training for a week for him and he is welcome to bring his spouse. The trip is an all-inclusive weeklong to the Bahamas. My customer informed me that such a trip is important to give a well-deserved vacation for him and his spouse, and he is inclined to go with the new vendor if we cannot match the offer. I am leaning towards matching the offer in order not to lose the business.

**Response:**

You should not agree to the customer's request. Agreeing to give the customer his wish of a paid all-inclusive vacation as well as for his spouse constitutes a bribe. You should decline this offer and discuss it with your direct manager. Additionally, you should report this incident to the Compliance Team.

**Scenario:**

I work in the procurement department. Recently, a supplier came to visit our facilities. We met regarding a potential new supply contract, and the supplier knew that we were also meeting with other potential suppliers about the same. As he was leaving, the supplier offered me what appeared to be a pearl necklace as a gift for my wife in return for my hospitality. I did not think the pearls were real, so I accepted it.

**Response:**

You should not have accepted the gift without knowing its true value because the circumstances under which it was given indicate that the supplier's motivation was to influence your decision on



whether to give his company the contract. You should have declined the gift, or if you accepted it because you were concerned that declining would be rude or perceived as an insult, you should have immediately visited your Compliance Department to disclose the gift and turn it over for handling.

## Guidelines

This section provides guidance on specific transactions, with reference to Aramex's requirements and expectations and should be used as a reference to make sure the transactions and business relationships comply with our Code of Conduct and this Policy.

### 1. Gifts, Entertainment and Hospitality

Doing business often involves giving and receiving some common courtesies, such as discussing a sales agreement over lunch, meeting with clients for dinner or accepting promotional items at a trade show. However, it is not always easy to identify whether providing gifts, entertainment or hospitality would be considered a corrupt act under Applicable Laws.

Under certain circumstances, it is permissible by the Applicable Laws to provide modest gifts or a meal or other entertainment as a social amenity, and this Policy is not meant to hinder your ability to build relationships with external parties and compete in the market, but rather, it should help you identify acceptable and legal business courtesies.

Generally, gifts, entertainment and hospitality are permissible, provided that:

- There is no expectation that the gift, entertainment or hospitality will be given or received in exchange of any return, favor or business advantage from the receiver.
- The gift, entertainment or hospitality is infrequent, reasonable and proportionate in amount under the circumstances.
- Your direct manager, Compliance Department and Legal Department are always consulted regarding the acceptability of the offer under Applicable Laws and this Policy.

### 2. Third Parties

Engaging Third Parties<sup>5</sup> is a necessary part of our business. They provide materials and services necessary to build our services, represent our brand in global markets and reach new customers.

Applicable Laws prohibit corrupt acts made indirectly through Third Parties acting for or on behalf of the company. Essentially, these third parties are an extension of Aramex, and any corrupt acts they carry out while conducting business might create liability for our company.

Accordingly, the most important step the company can take to protect itself from liability for improper acts made by Third Parties is to choose them and monitor them carefully.

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<sup>5</sup> **Third Parties:** franchisees, agents, consultants, contractors, sub-contractors, vendors, suppliers and anyone else who does work for or acts on behalf of Aramex.



The company should never enter any relationship with a third party who, for instance, will have substantive interaction with government officials on behalf of the company without an inquiry into the third party's background, qualifications and reputation.

Therefore, we must only choose business partners that would fairly represent our brand and values. For more details, you must read and follow [Aramex Due Diligence Policy](#).

### 3. Political Contribution

To remain free from corruption, we need to be aware of requests for political contributions by counterparties or government officials in exchange for influencing a transaction or spurring the completion of a pending deal. For example, a potential customer might state that he will buy Aramex products if we contribute to a government department, organization, political party or group with which the customer or his relatives are associated. Political contributions are especially concerning because they are hard to trace back to the person, group or company that requested them.

Under no circumstances can a political contribution be made to gain an improper advantage, or it would otherwise violate this Policy and Applicable Laws.

### 4. Charitable Contributions

As a global company, we can help those in need through charitable contributions. However, charitable contributions, like political contributions, can be a devious way to give bribes. This can occur when counterparties or government officials request donations to charities with which they are associated as a prerequisite to or part of a transaction with us.

Under no circumstances can a charitable contribution be used to gain an improper advantage or otherwise violate this Policy and Applicable Laws.



### Values Checkpoint!

**Scenario:**

We engaged an agent to help facilitate an agreement with a new customer. The agent informed us that the customer's representative would conclude the contract with Aramex if we directed an initial lump-sum payment to a charity that his wife has organized. I informed the agent that this is against our Policy, and we cannot make this payment to conclude negotiations.

**Response:**

In this case, you lived up to our values. The customer's representative required Aramex to make a charitable contribution in order to secure a business advantage. Any payment made to secure such an advantage is against our Policy, even if it is made for a good cause.



## 5. Facilitation Payments

Facilitation payments or “grease payments” are offers or payments made to a government official to expedite or secure the performance of a routine governmental action, such as issuing permits or releasing shipments held at customs.

Facilitation payments are prohibited under this Policy. Although there is a narrow exception for facilitation payments under the FCPA, such payments are prohibited under the UKBA and the laws of many other countries. Therefore, in order to ensure compliance with the Applicable Laws, Aramex prohibits facilitation payments altogether.

The prohibition extends to payments made by third parties or business partners on behalf of Aramex.



### Values Checkpoint!

#### **Scenario:**

We engaged an agent to help us submit a bid for a warehouse construction. The agent informed us that to begin the bidding process, we would need to be granted a permit by the local government authorities, and that the permit could take up to 90 days to be granted. The agent said she could make a small payment to one of the officials at the government to expedite the issuance of the permit. I told the agent to go ahead with the payment.

#### **Response:**

Facilitation payments are against our Policy. In this case, you have not lived up to our values and the needed disciplinary action will be carried out considering the scenario and circumstances.

## 6. Government Officials

A government official is any officer or employee of a government, any public international organization (i.e. 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 of 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.

Activities and dealings with government officials are highly regulated under the Applicable Laws. Employees should always consult the Compliance and Legal Departments to ensure that they are acting in accordance with this Policy and Applicable Laws.

Providing anything of value to a government official is prohibited under this Policy and is considered a violation of Applicable Laws.



**Values Checkpoint!**

**Scenario:**

Sara is trying to obtain a permit to get permission to use a particular piece of property for a warehouse in a new location. She knows that these permits are limited, and there are competitors also trying to get a permit for that same location. A local official takes Sara aside and says that he will favor her request over those of the competitors if she, personally, gives him \$5,000 in cash. He explains that this is how business is done, and if she doesn't do it, then he will issue the permit to a competitor who does pay. Sara doesn't want to lose business for the company, so she makes the payment.

**Response:**

Sara did not live up to our values. The local official that Sara offered payment to, is likely considered a government official under Applicable Laws, and the payment is a bribe because it was made to gain an improper business advantage.

**7. Exception for Extenuating Circumstances**

There are certain situations where you are permitted to make a payment that is otherwise not allowed under the Applicable Laws or this Policy. These situations are rare and the payment is allowed only if extenuating circumstances exist when a demand is made for a payment that could lead to bodily harm or other safety threats. For example, when a payment must be made immediately to ensure safe passage out of a particular place.

The threat could be to yourself, your family members, your colleagues or their family members.

Employees should make whatever payment is necessary to protect their personal safety, and then, as soon as reasonable, report the nature of the incident and related payment to the Compliance and Legal Departments.

**Accounting and Recordkeeping**

All transactions must be recorded accurately and transparently. Proper and accurate record keeping ensures that all dealings and transactions are free of corruption. Therefore, we must comply with all accounting regulations and standards, as well as our internal policies.

Furthermore, when making expenditures on behalf of Aramex, we must properly record the details of all transactions, accounting for all funds and benefits received as part of these transactions.

Extra care must be taken to ensure that the treatment of any gifts, entertainment, hospitality or other benefits provided to officials in the public and private sectors comply with the Applicable Laws, this Policy and Aramex's accounting and recordkeeping requirements.



To comply with these requirements, all employees and related parties **must**:

- Follow company's accounting requirements as set out in the standard policies and procedures.
- Accurately record all transactions, even when the transaction might violate the Applicable Laws and this Policy.
- Never agree to requests for false invoices or for payments of expenses that are unusual, excessive, or inadequately described.
- Never make any payments to anonymous accounts that are not in the name of neither payee nor the entity known to be controlled by the payee.

Proper recordkeeping is essential to our compliance with the Applicable Laws and for us to maintain and uphold the spirit of this Policy, furthermore, to establish that the company has adequate procedures in place to prevent corruption.

### **Non-Compliance Disciplinary Measures**

Beyond the legal and financial penalties that Aramex and its employees could suffer because of non-compliance with the Applicable Laws and this Policy, failure to comply can also result in disciplinary actions, as permitted by law, up to and including termination of employment.

Additionally, certain laws provide for severe penalties, which may include considerable fines and potential imprisonment for up to 20 years in the case of violations.

Managers who fail to supervise employees' compliance with this Policy may also be subject to disciplinary actions. Managers should lead by example and be a resource for employees who have questions or need advice.

### **Conclusion**

Thank you for reading our Anti-Corruption Policy. The information in this Policy supplements our Code of Conduct, serves as a manual to help you face potential corruption with confidence and gives you the tools necessary to make the right decision.

Most importantly, this Policy demonstrates our commitment to supporting you as an Aramex employee or related party, and our genuine interest in helping you make decisions in accordance with our values.

If a situation does not feel right, you have our full support to walk away from it and seek further guidance from various resources within the company as described in the "Reporting Violations" section of this policy.

For further information on our values and commitment to ethical conduct, please take your time and review our Aramex Code of Conduct.



**Appendix I: Methods of reporting a potential violation anonymously**

Potential violations could be anonymously reported via the following **methods**:

**a. Case Management System**

Concerns can be reported through our reporting [channel](#), following the various steps below:

- a. Select your language accordingly.
- b. Then, click the Submit key to start reporting your case.
- c. Please note that you will need to answer a few questions related to your allegation prior to reporting the allegations' description.

**b. Hotline "Toll-Free" Telephone as follow:**

By calling one of the various external telephone numbers as below:

Region	Country	Telephone Number
GCC	United Arab Emirates (UAE)	800 0320692
	Saudi Arabia (KSA)	800 850 1502
MENAT	Jordan	06 429 6441
North Africa	Egypt	150 169 2053
Sub Saharan Africa	South Africa	080 098 2093
North America	USA & Canada (English)	833-203-5713
	USA & Canada (Spanish)	800-216-1288
	Canada (French speaking)	855-725-0002

**c. Anonymous Reporting App from Lighthouse Services**

This app can be downloaded to your phone and will enable you to submit new anonymous reports and follow up on anonymous reports related to an issue at your company or organization. To use the app:

First, download it to your phone and install it.



- If your phone is an **iPhone**, download the app [here](#) or scan this code



- If your phone is **not an iPhone**, download the app [here](#) or scan this code



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 in assessing or investigating your concerns, it is essential to report in good faith and provide all required details of the reported allegations.