COMPLIANCE FRANCHISEE GUIDEBOOK

Table of Contents

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INTRODUCTION

The guidebook emphasizes the critical role of the Aramex compliance team in facilitating communication, ensuring compliance, and fostering a culture of adherence within the franchisee framework. It underscores the significance of aligning franchisee operations with Aramex's compliance standards, highlighting due diligence processes, agreements, trade controls, conflict of interest declarations, training initiatives, and whistleblowing policies.

Aramex's meticulous approach to compliance aims to uphold operational integrity, mitigate risks, and align the data between the stakeholders.

ROLES & RESPONSIBILITIES

Franchisees are responsible to uphold a compliant culture aligned with Aramex Code of Conduct and related compliance policies. Furthermore, to adhere to Aramex's guidebook and fulfill requested requirements.

The compliance team will ensure compliance with the guidebook containing but not limited to:

- Enforcement of Policies: Ensure that franchisees comply with Aramex's compliance policies and procedures, including due diligence processes, trade controls, and conflict of interest declarations.
- Training and Awareness: Provide training and awareness programs to franchisees on Aramex's code of conduct and related compliance policies to foster a culture of adherence within the franchisee network.
- Monitoring and Oversight: Monitor franchisee operations to identify and address potential compliance risks, conducting regular audits and assessments as necessary.
- Reporting and Response: Establish clear reporting mechanisms for franchisees to report compliance issues or concerns and take appropriate actions to address any violations promptly.

COMMUNICATION

During the initial stages of the Franchisee's onboarding process, the Aramex Global compliance team (“Compliance”) should be an integral part of the communication process to gain the required understanding of the engagement and liaise Aramex compliance operation with Franchisee counterparts and agree on the compliance requirements.

FRANCHISEE CHECKLIST FILE

All potential franchisees are required to comply with Aramex’s compliance policies and provide the mandatory requirements.
The following is a list of required documents and information that must be obtained and maintained by the compliance team prior to commencing any engagement.
The list also includes interests that Franchisees must be aligned with such as Aramex Whistleblowing process, as well as the ongoing involvement of the compliance team once the service agreement is commenced.

COMPLIANCE CULTURE

Before commencing the Franchising services, Franchisee employees must be trained and aware of Aramex's code of conduct and related compliances provided by the Aramex Compliance Team – as noted in the Section below.

Franchisee Onboarding Process

Item 1: DUE DILIGENCE PROCESS

New Franchisees, and Franchisees under renewal must go through the following due diligence process:

1. **The Compliance Due Diligence Process:**

   The internal Due Diligence process is performed by Aramex Compliance team in which Franchisees are required to provide the following documents:

   A. **Complete Aramex Compliance questionnaire,** which is an essential part of risk management.

   Conditions for questionnaire review and approval:

   i. Must be signed and stamped by the Franchisee (authorized signatory)
   ii. Confidentiality statement that all information provided will be used strictly for the purpose of this evaluation. no information will be shared with external entities of any type.
   iii. The acknowledgement section of the questionnaire requires that you read and acknowledge your understanding of Aramex's Code of Conduct.
   iv. The questionnaire must be **fully** completed.

   You can access the questionnaire declaration form through Process And Governance (aramex.com) *to download and complete the template.*

   B. **Copies of:**

   i. Registration certificate, trade license, or *VAT Certificate for companies registered in theEU).*
   ii. License/permits required to practice the activity.
   iii. Official list of authorized signatories.
   iv. major shareholders personal identification documents: Driver's License and/or Passport.

   ***All provided copies must be in English or translated into English*.**

   C. **A list of all Franchisee's employees containing:**

   i. Names of employees.
   ii. Status of employees (System Users or Non-System Users)
   iii. email address.
   iv. Job title.
   v. Language spoken.
   vi. Local trainers' names if available.

   D. **A list of Franchisee Active Suppliers.** Franchisees are required to provide the compliance team with a list of all active Vendors as they will undergo denied parties screening by the compliance team.

E. **A list of Franchisee Customers**. Franchisees are required to provide the compliance team with a list of all active Customers as they will undergo denied parties screening by the compliance team.

You can access the Active Suppliers and Customers templates through [Process And Governance (aramex.com)](aramex.com) *to download and complete.*

1.2 Supplier Due Diligence Process:

Aramex's Supplier onboarding process should always be carried out. Also, periodic Supplier risk assessments should also be carried out by an organization to ensure that its third-party vendors adhere to its quality standards and do not pose a risk to the business, its customers, or its investors.

Please refer to Aramex Third Party Due Diligence Policy below.

Supplier approval requirements:

i. Location of the vendor (Country)
ii. Valid legal documents (Registration certificate or trade license (etc.)/ VAT Certificate for vendors who are registered in the EU).
iii. Signed and stamped compliance basic questionnaire.
iv. Companies that are unable to provide us with English legal documents: a confirmation letter from the company with their English name and a stamp (or confirmation of bank details)

Item 2: ARAMEX FRANCHISEE AGREEMENT

Subject to terms and conditions of this agreement, Aramex herby grants the Franchisee a non-exclusive and non-transferable license to use the brand. All authorized signatories must sign all agreement pages upon completing all compliance and business requirements.

Item 3: TRADE / EXPORT CONTROLS

3.1 Keeping an eye on Franchisee compliance.

Monitoring compliance ensures that Franchisees are operating in accordance with Aramex Code of Conduct and related compliance policies as well as, local and international laws and regulations.

Franchisee must not mobilize shipments directly or indirectly from and to the following countries:

- **Belarus**
- **Crimea, Donetsk, and Luhansk Regions**
- **Cuba**
- **Iran**
- **North Korea**
- **Russia**

Franchisee must not use directly or indirectly any airline on the following list:

Airline Name	
• **Aeroflot Russian Airlines**	• **Islamic Republic of Iran Shipp**
• **Aerogaviota**	• **KISH AIR**
• **Air Koryo**	• **Mahan Airlines**
• **Alrosa Mirny Air Enterprise**	• **Nordwind Airlines**
• **Belavia**	• **S7 Airlines**
• **Cham Wings**	• **SYRIAN ARAB AIRLINES**
• **Conviasa**	• **Ural Airlines**
• **Cubana de Aviation**	• **YAS air Cargo**
• **IRAN AIR**	

For more details or if you have any concern, you may reach out to the Trade Compliance Team at:

aramexsecurityteam@aramex.com

3.2 Reporting Requirements:

- All prospect vendors must be shared with Aramex Compliance Team to undergo screening prior to opening accounts.
- All compliance issues and inquires related to the code of conduct and related policies (i.e. offering/receiving Gifts,…) must be shared with Aramex Compliance Team for review.
- Franchisees must comply with the due dates set by the compliance team for Training and requested reports.

Consequently, Aramex Compliance Team reserves the right to:

i. Perform the due diligence process annually or as necessary.
ii. Hold face to face and/or remote Compliance Awareness Assessment as we see necessary.
iii. Request information related to any of the Franchisee’s Vendors, Agents, Customers, and Employees.

3.3 Consequences of Violations of Compliance Policies

Violations of compliance policies may lead to disciplinary actions, including termination of agreement and potential subsequent personal liability. The nature, scope, intent, and significance of the potential consequences of the non-compliance determine the level and type of disciplinary action.

3.4 Types of Non-Compliance

Non-compliance violations are divided into the following types:

- Intentional non-compliance:
- A non-compliant act that is voluntary, willful, deliberate, or conscious, and directed towards ignoring an applicable law and/or a compliance policy.
- Unintentional non-compliance: A non-compliant act that is incidental, undesigned, unexpected or unmeant, and not directed towards disregarding an applicable law and/or a compliance policy.

Item 4: CONFLICT OF INTEREST DECLARATION FORM:

Franchisee employees are required to complete Aramex Conflict of Interest (COI) Questionnaire annually in accordance with Aramex COI policy.

The Compliance team will initiate communication with all employees through e-mails and Franchisee HR will be responsible for completing the process with Non-System Users via manual reports as stated in the link below and send back completed COI questionnaires to Aramex Compliance team.

You can access the COI declaration form through this link: Process And Governance (aramex.com)

Item 5: TRAINING & AWARENESS:

4.1 Franchisee employees must attend and complete Aramex's mandatory Risk & Compliance induction training.

- Franchisee employees are also required to attend and complete the **annual** Risk & Compliance refresher which occurs annually during Q3 of every calendar year.

4.2 Franchisee management team are responsible to ensure that all employees are acquainted with Aramex's Code of Conduct and related Compliance Policies as each of the below mentioned policies establishes guidelines for specific compliance areas.

Anti- Corruption Policy	Aramex Anti-Corruption Policy
Gifts, Entertainment, and Hospitality Policy.	Aramex Gifts, Entertainment and Hospitality Policy
Conflict of Interest Policy.	Conflict of Interest Declaration Form Guide
Trade Compliance Policy	Trade Compliance
Anti-money laundering policy.	Aramex Anti-Money Laundering Policy
Whistleblowing Policy	Aramex Whistleblowing Policy
Third Parties Due Diligence Policy	Aramex Third Party Due Diligence Policy
Non-Compliance Disciplinary Policy	Aramex Non-Compliance Disciplinary Policy

- Franchisee employees are required to attend and complete all ad hoc Risk & Compliance training as the Compliance team see fit.

Item 6: WHISTLEBLOWING

6.1 In accordance with the Code of Conduct, whistleblowing is intended to remind employees and related parties of their obligation to report suspicions of non-compliance with the code as well as concerns of wrongdoing without fear of retaliation.

The purpose of Aramex's Whistleblowing policy is to:

- Encourage you to report concerns with confidence.
- Make it easy, secure, and consistent worldwide for you to voice your concerns and get feedback on any actions taken.
- Reassure you that the company will not tolerate any retaliation against you for expressing genuine concern.

6.2 Reporting Cases

Potential violations could be reported anonymously via the following methods:

a) Case Management System “Lighthouse”
Log-in to www.lighthouse-services.com/aramex and follow the steps:

i. Select your preferred language.
ii. Click Submit to start reporting your case.
iii. Answer a few questions related to the incident.

b) “Toll-Free” Telephone:

Please refer to Aramex Whistleblowing policy for more information. Aramex Whistleblowing Policy