

Aramex Supplier Code of Conduct

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1. Introduction

This Supplier Code of Conduct (“Code”) contains specific Corporate Policies that relate to the legal and ethical standards of conduct expected by all business partners; suppliers, consultants or any party representing or providing services to Aramex including extended workforce such as temps, agents and independent contractors, and others who may be temporarily assigned to perform work or services for Aramex (herein referred to as “Suppliers”).

References to Supplier(s) shall also include reference to the employees of the relevant Supplier. Suppliers also include all sub-contractors and the representatives of the Supplier.

The Code provides the legal and ethical framework upon which decisions must be based and provides guidance and support for carrying out duties in ways that are compatible with Aramex’s Values¹ and to uphold the following key principles:

- Honesty
- Openness
- Accountability
- Objectivity
- Selflessness

The Code is organized into three categories containing guiding principles that should be applied by Suppliers to guide behavior across all areas of activity:

1. Culture of Integrity in the Workplace
2. Culture of Integrity in Doing Business
3. Commitment to the Code of Conduct

This Code is comprehensive; however, it does not cover every situation that may be faced while on the job, similarly it is assumed that all parties (such as Aramex employees, related parties, and Suppliers) conduct themselves in good judgment and with an ethical compass.

We require all Suppliers to adhere to this Code and to ensure that all their related parties adhere to the Code when conducting Aramex business.

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

2. Culture of Integrity in the Workplace

We expect Suppliers to commit to providing a supportive and healthy working environment based on fairness and honesty, one that rewards achievement, dedication, teamwork, attitude, and personal skills that embody the spirit of Aramex's Values.

Aramex's organizational culture guides the 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 that promote a dignified life for all.

We commit, and require our Suppliers to commit, to establishing a work environment based on the following tenets:

2.1. Non-Discrimination and Equal Employment Opportunities

All Suppliers should respect diversity and the distinctions of individuality. As well as provide equal opportunities and encourage diversity at every level and stage of employment, including hiring practices.

Every Supplier should move towards the company's objectives collectively and collaboratively without regard to race, ethnicity, nationality, religion, gender, relationship status, sexual orientation, age, parental status, disability or health, or any other status protected by the local laws or regulations of where they operate. Discrimination or harassment based on these characteristics will not be tolerated by Aramex.

2.2. Equitable and Fair Treatment

All Suppliers should commit to ensuring fair treatment for their all employees based on merit, including training and advancement opportunities. Merit includes performance, business contribution, expertise, skills, aptitude, and attitude.

Aramex expects Suppliers to provide a work environment that is free of harassment, bullying, and abusive conduct—whether physical, verbal, or visual. We encourage Suppliers to share their concerns with Aramex on the understanding that we do not tolerate retaliation against anyone who reports a genuine concern.

2.3. Safe, Secure, and Healthy Working Conditions

Suppliers should commit to providing safe and healthy working conditions at all premises, including traffic safety.

Aramex's goal is "zero incidents", and Suppliers must do their best to promote and achieve this principle.

2.4. Accountability

Accountability is the basis of responsibility. Corporate reprimand and reaction should always be in proportion to the Supplier's action or violation and in accordance with company policies and/or our contractual or legal rights.

However, any Supplier 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 complicit in the breach.

2.5. Open Communication Policy

Aramex is firmly committed to ensuring that Suppliers who are using the open-door policy in good faith shall not be subject to retaliation by anyone at Aramex. Acting in good faith means that the Supplier has a reasonable belief that the information is correct and accurate.

We encourage our Suppliers 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 taken where necessary. Please refer to our [Whistleblowing Policy](#) for more details.

2.6. Human and Labor Rights Including Anti-slavery and Human Trafficking

Aramex commits and requires Suppliers and their employees to commit to respecting human and labor rights standards at all times, including but not limited to the standards, laws, guidance, and regulations set out in our [Human and Labor Rights Policy](#), our [Modern Slavery Statement](#), ILO Declaration on Fundamental Principles and Rights at Work - inclusive of remuneration regulations and standards, and Universal Declaration of Human Rights - the United Nations (collectively “Human and Labor Rights Standards”).

In performing their services or obligations towards Aramex, we require our Suppliers to:

- Ensure that their operational policies reflect their responsibility to respect Human and Labor Rights Standards, meaning that Suppliers shall:
 - Identify, prevent, and mitigate any potential or actual adverse Human and Labor Rights Standards impacts resulting from their activities or through their relationships with subcontractors, suppliers, or other third parties.
 - Remediate any actual adverse Human and Labor Rights Standards impacts which they cause or to which they contribute as soon as practicable.
- Implement due diligence procedures for their own operations and supply chains to identify actual or potential Human and Labor Rights Standards impacts and take the necessary steps to prevent, mitigate, or remediate any adverse impact.
- Notify Aramex immediately if you have been or are the subject of any investigation, inquiry, or enforcement proceedings by any government, administrative, or regulatory body regarding any offence or alleged offence of or in connection with an adverse Human and Labor Rights Standards impact.
- Permit Aramex and its third-party representatives to inspect your premises and records, and to meet with your personnel to audit the Supplier’s compliance with Human and Labor Rights Standards.

Subject to any contractual agreement in place, Suppliers 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 by a Supplier of the Human and Labor Rights Standards.

2.7. Conflicts of Interest

We face conflicts of interest when we cannot rely on a person or an organization for clashes between personal interest with duties and responsibilities on the professional level.

Such conflicts arise when an entity or an individual has a personal stake, whether it is related to relationships, money, or status, and they put their personal interest over their duties, responsibilities, or the interest of the organization they are working for. This may also include exploiting their position or status for personal gain.

Suppliers should disclose any conflict of interest to Aramex directly. This ultimately protects our reputation, as well as the reputation of our Suppliers.

3. Culture of Integrity in Doing Business

We aspire to build a culture of integrity. This culture is evidenced in our relations with our stakeholder groups, which is 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, Suppliers, shareholders, and the community at large.

Third party stakeholders and in particular **our Suppliers** 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 like-cultured, like-minded third parties who seek long-term relationships based on the following factors:

3.1. Compliance with Laws and Regulations

We conduct business responsibly and in compliance with all laws and regulations related to our operations and business activities in the countries of operation, this includes without limitation all applicable laws, statutes, and regulations referred to in this Code, Human and Labor Rights Standards as well as those governing protection of personal data and intellectual property rights.

Suppliers are responsible for the same level of compliance and for following the legal, professional, and ethical standards that apply to their job, function, services, and level of responsibility.

We expect our Suppliers not to engage, directly or indirectly, in any form of corruption or bribery and not grant, offer, or promise anything of value to Government Officials² or to counterparties in the private sector to influence official action or obtain an advantage.

In addition to the local laws of each country in which we are based, we strive to comply with all international laws and efforts (such as European Union, U.K. and U.S. competition and anti-corruption laws) that apply to our operations globally. Therefore, our Suppliers shall also respect and comply with such laws.

We always seek partnership with Suppliers who comply with all applicable local and international laws and regulations. As such, we do not tolerate illegal or non-compliant behavior from our Suppliers.

Our Suppliers are expected to know the details of every legal requirement applicable to their business worldwide and to the services which they provide to Aramex and to comply with them.

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.

3.2. International Trade and Trade Compliance

Trade compliance is the process by which parties (e.g., manufacturers, wholesalers, shippers, airlines, sea liners, freight forwarders, consignees, etc.) who are involved in moving tangible and intangible products (i.e., software, information, and goods) across international borders, strive to conform with all export and import laws and regulations.

We abide by and will continue to abide by all applicable trade laws and regulations including, but not limited to, the Bureau of Industry and Security (BIS) of the United States' Department of Commerce, the Commerce Control List (CCL) of the Export Administration Regulations (EAR) of the US Department of Commerce, the Office of Foreign Assets Control (OFAC), International Traffic in Arms Regulations (ITAR) Munitions Lists, the European Union export controls, and other export controls laws and regulations. Our Suppliers are expected to do the same.

3.3. Fair Competition and Anti-Trust

We apply the principles of fair competition based on the quality of services we offer, thereby taking a strong stance against market abuse and we expect our Suppliers to take the same stance.

We require our Suppliers to ensure that our/their operations comply with applicable anti-competition and anti-trust laws and regulations. To do this Suppliers should avoid:

- 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 a competitor's confidential information.
- Obtaining or using any information related to our competitors or customer through any illegal methods.

3.4. 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 Suppliers to exercise the same commitment.

We strive to comply and require our Suppliers to comply with 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, as well as [Aramex Anti-Corruption Policy](#). It is important to keep in mind that what applies to us, must also apply to our Suppliers.

Some countries in which we operate may have stricter laws than those mentioned in this Code. As a general 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.

3.5. Business Gifts and Entertainment

Business gifts, entertainment, and hospitality on a modest scale are commonly used to build goodwill and strengthen working relationships. It is a part of business and 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. If offers of gifts, entertainment, or hospitality are frequent or of substantial value, they may create the appearance of, or an actual, conflict of interest or illicit payment.

Suppliers should comply with this Code in terms of business gifts and entertainment.

3.6. Insider Trading, Financial Records and Accounting

3.6.1. Insider Trading

Suppliers who have access to inside information are not permitted to buy or sell any securities based on such information or communicate the same to any third party who then trades in those securities.

Insider information means information that has not yet been made public and which if it were made public would likely have a significant impact on the trading price of the securities.

In many countries, insider trading, or giving inside information to unauthorized parties, is a criminal offence and may result in fines and/or imprisonment.

3.6.2. 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.

The financial integrity of our operations concerns our stakeholders, which include shareholders, government authorities, Suppliers, and employees. Aramex's financial reputation is affected by our actual and perceived integrity by all stakeholders. Our reputation for financial integrity depends on our consistency in providing complete, timely, and accurate payments, billing, and reporting, and keeping accurate and complete records at all times.

Suppliers have a role in ensuring the integrity of our financial transactions, records, and financial and non-financial reporting.

3.7. Third Party Due Diligence

Third parties (who may become Suppliers) 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, Aramex must only choose Suppliers that we feel comfortable with in representing our brand and Values.

Building long-term relationships with Suppliers is based on transparency and mutual respect are key values for Aramex. Therefore, we actively seek out and favor Suppliers 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 Suppliers documentation, and risk-based auditing.

For further details refer to [Aramex Third Party Due Diligence Policy](#).

3.8. Confidential Information and Intellectual Property

Information that is deemed confidential should be protected from disclosure both within and outside Aramex.

Aramex employees are obliged to take care to protect the confidential information of third parties (i.e., including Suppliers) which comes into their possession by reason of their positions within Aramex.

Thus, Suppliers must take all necessary precautions to guard our proprietary information from disclosure to competitors and other unauthorized third parties.

Confidential information includes software developed in-house or by third parties, personal data of employees, customers, and Suppliers, as well as proprietary information concerning methodologies, processes, business plans, customer databases, pricing information, and new concepts.

Any knowledge of infringement or potential infringement of Aramex's intellectual property rights should be brought to the attention of the Aramex point of contact immediately.

3.9. 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 [Aramex Privacy Policy](#).

We expect every Supplier to respect and protect personal data, especially as related to customers, employees, and shareholders in accordance with applicable laws and regulations.

3.10. 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 Suppliers to comply with the applicable working time laws and regulations in relation to their employees together with the Human and Labor Rights Standards and their contractual/ legal duties towards Aramex.

Should a Supplier be authorized to use Aramex's resources, such use must not be excessive, for personal gain, for illegal purposes, or otherwise abused.

3.11. 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, including local, anti-money laundering laws in every country in which we operate.

We require our Suppliers to do the same.

A copy of our Anti-Money Laundering Policy will be made available when deemed appropriate for Suppliers upon request. As a general rule, we follow the most stringent law, regulation or policy applicable to our business in these countries.

3.12. Environmental Leadership / Sustainability-Oriented Innovation

As a company in the transportation solutions and logistics business, our operations can have a significant impact on the environment, including contributing to climate change.

Protecting the environment and addressing climate change has become one of the most important global issues and is an emerging issue in many developing economies including those in the Middle East.

We take a precautionary approach to environmental challenges, emphasizing respect for the environment as mentioned in [Aramex Environmental Policy](#).

All Suppliers are responsible for pollution prevention and for compliance with applicable environmental laws and regulations in the course of making business decisions. Additionally, each Supplier should have a clear target in relation to the climate change international commitments, including but not limited to, the Paris agreement, carbon neutrality, and Net Zero.

4. Commitment to the Code of Conduct

4.1. Speak Up

We are proud of our commitment to our culture in conducting business and trust our Suppliers 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 Suppliers to do the same.

Suppliers 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, are encouraged to come forward.

We cannot address questions or concerns unless we are aware of them.

4.2. How to Speak up

Our [Whistleblowing Policy](#) is available to all third parties (including Suppliers) and Whistleblowing concerns can be raised via the following e-mail: Whistleblowing@aramex.com.

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.

4.3. No Retaliation

In no event will an employee, Supplier, or third party who makes a report through our Whistleblowing system be subject to retaliation.

Any person, regardless of their position, who engages in retaliatory behavior will be subject to disciplinary or corrective actions. Provided that reports are made with a reasonable belief that non-compliance issues are occurring, no action will be taken against a person who raises a concern that eventually proves to be inaccurate.

Abusive accusations will not be tolerated. We expect every Supplier to support this Code and encourage every employee, third party, and Supplier to speak up for what's right when something is wrong.

4.4. 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 Suppliers, including but not limited to one or more of the following actions:

- Termination of services.
- Financial penalties.
- Declaration to regulators.
- Auditing of a Supplier's activities.
- Legal action and/or lawsuits.

The level and type of corrective action is driven by nature, scope, intent, and materiality of potential consequences of the non-compliance as well as Aramex's legal and contractual rights.

4.5. Enforcement

Violations of the Code will not be tolerated. Employees and Suppliers are encouraged to speak up when behavior 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 Non-Compliance Corrective Actions in line with applicable laws and regulations as well as any internal Aramex policies and contractual rights.

At Aramex there is an independent function to manage and oversee the deployment of the Code and the accompanying related policies. The Risk and Compliance function will review this Code on a regular basis and consult with the Legal function to decide on amendments, as appropriate.