



**COM 1151 - (I) Aramex
Whistleblowing Policy -
External**



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1. POLICY PURPOSE

This policy is intended to remind all employees and Related Parties¹ of their responsibilities to uphold Aramex's values and to conduct business ethically, with integrity and honesty in accordance with the Code of Conduct.

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

The purpose of this Policy is to:

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

2. APPLICABILITY

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

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

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

3. APPLICABLE LAWS

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

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

4. RESPONSIBILITY

As employees and Related Parties of Aramex, we are responsible to uphold our values and to conduct business ethically, with integrity and honesty in accordance with the Code and related Compliance Policies. Therefore, we have a responsibility to speak up and to report any potential violations.

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



WHAT VIOLATIONS SHOULD BE REPORTED?

Any deviation of our culture and integrity in relation to the Code and related Compliance Policies that may seriously affect our employees or Related Parties, which may include, but not be limited to:

- **Violation of laws and regulations** including any criminal activity.
- Possible **fraud** or abuse of powers.
- **Breach of confidentiality.**
- **Human and labor** rights violations.
- **Environmental or health and safety** related violations.
- Any other issues related to **Aramex’s Code of Conduct** or related policies including the Compliance Policies referred to in Section 4 above; or
- Deliberate **concealment** of any of the above.

This list is not exhaustive. If you are uncertain about whether something is within the scope of this policy, then you should seek advice from the Risk and Compliance Department or from the Human Resources Department before reporting.

5. 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 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. In order to use the app:

First, download it to your phone and install it.

<ul style="list-style-type: none"> If your phone is an iPhone, download the app here or scan this code 	<ul style="list-style-type: none"> If your phone is not an iPhone, download the app here or scan this code 
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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.

6. INVESTIGATING REPORTED INCIDENTS

Once your whistleblowing concern is received, the risk and compliance department will carry out an initial assessment to determine who should carry out an investigation. Any subsequent investigation will be carried out in a thorough and timely manner. You may be contacted to provide further information to support the investigation.

The outcome of the investigation will be communicated to concerned parties and you, the whistleblower.

Where the investigator(s) concludes that your concerns are well-founded (either in whole or part), and in cases of proven non-compliance with the Code or related Compliance Policies, we may and/or may be obliged to take action. Such action may include, but not be limited to one or more



of the following (although the need for confidentiality may prevent us from giving you specific details of the action taken):

- Disciplinary action against the perpetrators including warnings (verbal and/or written) and up to termination of employment/services.
- Financial penalties against the perpetrators.
- Making a declaration to regulators; or
- Legal action against the perpetrators