



**Aramex Modern  
Slavery  
Statement**

**aramex**  
delivery unlimited



Aramex PJSC is joint stock company listed on the Dubai Financial Market, which together with its subsidiaries worldwide (collectively “Aramex”) respects and promotes ethical labor practices and is committed to operating responsibly and adhering to the highest ethical standards. Consistent with this principle, Aramex takes a zero-tolerance approach to any form of modern slavery in its operations or supply chains.

This joint statement is intended to meet Aramex’s obligations under the applicable Global Modern Slavery legislation including but not limited to the requirements of section 54 of the Modern Slavery Act 2015 (UK), the NSW Modern Slavery Act 2018 and the Commonwealth Modern Slavery Act 2018 (Australia). This statement constitutes our modern slavery statement for the 2022/2023 financial year.

Aramex is committed to ensuring that the people and communities that support our business are treated with dignity and respect. We do not tolerate the use of child labor, forced labor, or human trafficking in any form—including slave labor, prison labor, indentured servitude, or bonded labor—in our operations or supply chain. Our commitment and approach are informed by leading international standards and frameworks developed by the United Nations (UN) and International Labour Organization. Aramex is committed to respecting and supporting the UN Guiding Principles on Business and Human Rights, UN Universal Declaration of Human Rights, UN Global Compact, UN Sustainable Development Goals, Core Conventions of the ILO, and ILO Declaration on Fundamental Principles and Rights at Work.

## **Our Business**

With over 40 years’ experience, Aramex operates a global delivery and logistics network across more than 68 countries. Approximately 16,000 Aramex employees provide a diverse range of transport and logistics solutions covering road, air and sea to help customers meet their global supply chain needs.

Aramex provides a diverse range of services to customers across the world, including:

- Freight forwarding;
- Logistics and supply chain management;
- International and Domestic Express Delivery (including domestic courier services);
- E-commerce: enabled by flagship products, including Shop&Ship and MyUS

To assist in the delivery of these services, Aramex works with an extensive network of suppliers, franchisees, subcontractors and agents including (but not limited to) national and international airlines, sea lines and (regionally) leading land freight operators.

At Aramex we make sure to engage with our suppliers through different channels and on a regular basis as required. Being a local entity in the geographies we operate, we ensure to source locally where available and possible, therefore much of our spending is on local suppliers.

**Our supply chain includes:**

- promotional merchandise and marketing
- IT Hardware, Systems and Software
- Marketing
- Facilities Management & General Administration
- HR Services
- Consultancies
- Professional Services
- Insurance
- Travel & Entertainment
- Financial Services
- Construction & Fit out
- Rent
- Labour
- Trucking and Fleet Outsourcing Management
- Freight and Linehaul Services franchise networks
- In certain markets, call centre services

**Our policies and procedures**

Aramex takes a zero-tolerance approach to any form of modern slavery within its business operations and supply chain. In support of this statement, we take the following steps to identify and manage risks of modern slavery:

**1. Policies and Procedures**

Aramex has in place a number of policies which are designed to identify, assess, raise awareness and manage the risks of modern slavery in our business activities including:

**A. Aramex Code of conduct**

At a group level, Aramex has in place a Code of Conduct (“the Code”). The Code sets out the principles of Aramex Corporate policies that relate to legal and ethical standards of conduct. This includes policies relating to compliance, anti-corruption, non-discrimination, equal employment opportunities, equitable and fair treatment and safe, secure and healthy working conditions. The Code is stated to apply to all directors, employees, business partners, suppliers, customers, consultants, franchisees or any other party representing or providing services to Aramex (“Business Associates”).

The Code also contains a section on human and labor rights including anti-slavery and human trafficking. The Code requires our employees and Business Associates (as well as their respective employees and supply chains) to respect human rights standards set out in our Human and Labor Rights Policy and sets out the consequences of failing to do so. Aramex considers that, on the whole, its implementation of the Code and its embedment in our processes and contractual terms establishes an ethical culture and environment in which knowingly allowing modern slavery to enter Aramex’s operations or supply chain will not be tolerated.

The Code is published on our website and can be found at this link:

- o [Aramex Code of Conduct](#)



## **B. Human and Labor Rights Policy**

Respect for Human Rights is a fundamental value of Aramex. Aramex is committed to meeting its responsibilities to respect fundamental human and labor rights in its workplace and business operations, supply chain, and in the communities where we operate.

The Aramex Human and Labor Rights Policy establishes our commitment to respect International Human Rights and the expectation that our directors, employees and Business Associates do the same. Our Human and Labor Rights Policy is published on our website and can be found at this link:

- [Aramex Human and Labor Rights Policy,](#)

## **C. Whistleblowing and Grievance Policies**

Aramex's Whistleblowing and Grievance Policies provide a platform for individuals to raise concerns relating to their employment, suspected misconduct, breaches of the Code or any other human rights violations including modern slavery and human trafficking. All allegations received are taken seriously and investigated as appropriate. Individuals can opt to remain anonymous under our Whistleblowing Policy. Our Whistleblowing Policy is on our website and can be found at this link:

- [Aramex Whistleblowing Policy](#)

Aramex takes a timely and proportionate approach to implementing corrective or disciplinary actions and learnings which arise as a result of disclosures made under these policies.

### **Employment policies and procedures - Steps taken:**

In 2022, we launched our annual risk and compliance refresher course, which contains the Code as part of the training. Additionally, the following policies are incorporated in the Code since 2021:

- [Aramex Diversity, Equity and Inclusion Policy](#)
- [Aramex Human and Labor Rights Policy,](#)

- In order to ensure understanding and compliance with the Code, all employees and where appropriate, current and new franchisees receive compliance training as part of the induction process, which is followed up by mandatory annual online training and consequently sign an acknowledgement that they have read and understood the Code. In 2022, 14,300 employees (including system and non-system users) took the 2022 Compliance Training –focusing on Anti Bribery and Corruption amongst other important compliance topics. In 2023, the Code of Conduct training will be mandatory for all staff and completed primarily online, with face to face learning sessions organized where appropriate.
- All new vendors and suppliers have to complete an acknowledgement that they have read, understood and will comply with the Code during the account onboarding process;



- Having launched our Human and Labor Rights Policy in 2021, we conducted relevant refresher trainings and awareness initiatives in 2022 (see below), and it is also published on our external website: [Human and Labor Rights Policy](#). The policy will be revised and recomunicated to employees in 2023.
- We keep our Whistleblowing Policy and reporting procedures under regular review and strive for continuous improvement. As part of this, in 2022, we launched a campaign raising awareness on Speak-Up culture, anti-bribery, code of conduct, and Whistleblowing. We also contracted an external supplier to enhance access as well as to ensure secure reporting of potential violations, which was introduced to employees in 2023. This campaign consisted of a number of informative posters and visual to raise awareness while highlighting the available channels for raising concerns, in particular through our Whistleblowing reporting portal. We also refreshed our Whistleblowing Policy, which is published on aramex.com, and was communicated to employees in 2023.

## 2. Training and building awareness

Aramex continues to raise awareness of human rights and modern slavery with training and eLearning on the Code and on our policies, which is continuously developed and integrated into our training plan and implemented in relevant training programs for employees.

Our performance in these areas is communicated and reported transparently in our annual sustainability report.

We also run targeted communications campaigns using our internal communications platforms, to raise awareness on human rights issues in an engaging and impactful way.

### Training and awareness - Steps taken:

- In 2022, a blended learning model was used to increase awareness and engagement on Human and Labor Rights, where over 2,640 employees took the virtual training on Human and Labor Rights including modern slavery through our Learning Management System. In 2023 we will mandate the training as necessary for all managerial staff and completed primarily online, with face to face learning sessions organized where appropriate, to try and cover the majority of our employees. In 2023, we will also launch an internal campaign on shaping behavior, focusing on how to be an ideal Aramex employee, complementing our existing ongoing campaign on "Speak-Up Culture"

## 3. Managing our relationships with third parties

Engaging third parties is a necessary part of our business. However, we understand that any illegal acts they carry out while conducting business for us may impose risks on Aramex. In order to mitigate this risk, we take the following steps when engaging third parties:

- (a) Aramex standard contractual terms and conditions

Wherever possible, we seek to impose contractual terms on our customers and suppliers requiring them to comply with our Code and/or any applicable laws which includes those



relating to human rights and modern slavery. We continuously review and update our contractual terms to ensure they align with our internal policies and external laws and regulations.

**(b) Due diligence**

Our procurement and compliance teams review and approve all vendors as per our due diligence process, which can be divided into 3 main stages:

Our compliance team perform due diligence on our vendors based on our risk assessment for each vendor. Our due diligence includes denied party screening and enhanced due diligence.

**Know Your Supplier (KYS):**

- All new suppliers and vendors are required to complete a compliance questionnaire (which is regularly reviewed) before we can open a new account. In 2022, over 1,250 questionnaires were completed by vendors, agents and franchisees.
  - Our compliance questionnaire requires the collection of information about the supplier's/ vendor's ownership, the business and its reputation. Our vendor compliance questionnaire contains a section about Human and Labor Rights and an acknowledgement of our Code of Conduct;
  - Once the compliance questionnaire has been completed, it is reviewed by our procurement team. Subject to satisfactory responses, the completed questionnaire is a pre-requisite for our SAP team to create a new account for the supplier/ vendor;
  - Before the account opening process is completed, all new suppliers/ vendors undergo a compliance review and approval process
- 1.** Third Party Risk Assessment: We analyze each party's risk factors and provide risk scores for each third party.
  - 2.** Enhanced due Diligence: We perform or request an enhanced due diligence process on third parties identified as "moderate-high" and "high" on the Third-Party Risk Assessment score. Depending on the outcome of the enhanced due diligence process we proceed with one of the following options:
    - a. we reject the third party and do not do business with them for a variety of reasons, including where the assessment demonstrates that the third party does not adhere to our supply chain standards;
    - b. we engage the third party but continue to monitor them with ongoing due diligence, as outlined above, to mitigate any risk.
  - 3.** Moreover, all franchisees undergo an external due diligence process which includes human and labor rights.

**Managing our relationships with third parties: Steps taken:**

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. As part of our strive for continuous improvement, we have:

- Rolled out a new comprehensive Procurement Policy to govern responsibilities internally and externally with our supplier base referring to and embedding our policies on Human and Labor Rights, Environment Management Systems, Social Involvement and Health & Safety systems into our procurement process;

**4. Potential risks in our operations and supply chains**

Through the support of a third-party service provider, which Aramex contracts every two years, Aramex has identified the risk of modern slavery practices in its operations and supply chains as low, as a result of our strong policies, procedures and standards. We regularly monitor and address human rights issues under our policies and procedures (which are reviewed annually) outlined above.

Risks that may arise within our operations and supply chains are migrant labor exploitation, equality, fair pay, excessive hours, safety and human trafficking.

**5. Actions taken to address modern slavery risks - Collaboration**

It is important and valuable for Aramex to work with internal and external stakeholders to develop solutions for some of the more complex and systemic problems found within a global supply chain. We believe that by maintaining strong direct relationships and undertaking collaborative work such as sharing information and resources we are all able to deliver real benefits.

To this end, our internal cross-functional Human and Labor Rights Committee is responsible for monitoring and implementing this statement. It is also responsible for developing our strategy and KPIs to measure effectiveness of steps taken in relation to Human and Labor Rights.

We also collaborate with external organizations and we are members of and signatories to the United Nations Global Compact.

**Collaboration: Steps taken:**

In the last 12 months we have continued to proactively collaborate with internal and external stakeholders on human rights and modern slavery risks, including signing a pledge with the UAE's Gender Balance Council to empower women and accelerate gender equality.

**6. Impact of COVID**

As the world has returned to levels of normalcy, Aramex continues to work with key suppliers to ensure the health and safety of employees and customers is of key consideration. Aramex continues to work with and support suppliers to deliver our services whilst working within local Government guidance. To the best of its knowledge,



Aramex has not encountered any significant issues or increased risks of modern slavery during the pandemic.

### **7. Measuring Effectiveness, Continuous Improvement and next steps**

Aramex recognizes the need to build on its understanding, oversight and management of modern slavery risks in its operations and supply chains on an ongoing basis. Good progress has been made and we continue to take new steps to manage the risks of modern slavery and human trafficking taking place in our business and supply chains. With that in mind, we set out below our focus areas for the next 12 months:

- Carrying out human rights impact assessments in selected markets, which shall be determined according to risk and size and developing action plans as required
- Progressing ongoing review and enhancements of our due diligence processes and controls: in 2023 we intend to review our Compliance Questionnaire issued to new suppliers and vendors, evaluating whether any areas can be updated and improved particularly in relation to human and labor rights matters;
- Keeping our grievance mechanisms for employees and third parties including supply chain workers under review and continuing to engage with suppliers to, where necessary, improve grievance and reporting processes within our supply chain;
- Continuing to review and, if necessary, updating our employment policies and procedures to maintain appropriate safeguards against modern slavery;
- Continuing to develop internal training and awareness on modern slavery and human rights. In 2023, we will adapt our e-learning training module to provide face to face training to our employees where appropriate;
- Education and awareness of our new Procurement Policy;
- Continue to keep our contractual terms under review to ensure compliance with applicable modern slavery laws and a right to audit them where relevant and appropriate.
- In 2023, our franchisees will be included in our annual mandatory compliance training

Due to the size and scope of Aramex's operations, the above focus areas will remain in focus in 2023, and are expected to continue as high priority initiatives, with an effort to renew and improve actions on a continuous basis.

### **8. Process of consultation with its entities**

Aramex engages directly with senior members across various departments within its subsidiaries and its Human and Labor Rights Committee has representatives from the Commercial, Human Resources, Legal, Risk and Compliance, and Sustainability departments. The Human and Labor Rights Committee is responsible to prepare this joint Statement and ensure a collaborative approach is taken to combat modern slavery.





Due to the alignment of our services, policies and procedures, we are confident that the consultation process is sufficient in ensuring modern slavery risks are identified, assessed, and addressed.

Potential violations of this Modern Slavery Statement should be reported through our Grievance Policy (employees only), by emailing [whistleblowing@aramex.com](mailto:whistleblowing@aramex.com), calling the toll-free numbers (employees only), or by using the contracted service: Lighthouse service (<https://www.lighthouse-services.com/aramex/>).

**This statement was approved by the Board of Aramex PJSC on March 15, 2023.**

**Chairman**