



# 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 labour 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 2023/2024 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 labour, forced labour, or human trafficking in any form—including slave labour, prison labour, indentured servitude, or bonded labour—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 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 seek to source locally where available and possible, therefore much of our supply chain 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. Our relevant policies include:

**A. The Aramex Code of conduct**

At a group level, Aramex has in place a Code of Conduct ("the Code"). The Code sets out principles 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 applies to all directors, employees, business partners, suppliers, consultants, franchisees or any other party representing or providing services to Aramex ("Business Associates").

The Code contains a specific section on human and labour 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 Labour Rights Policy and sets out the consequences of failing to do so. Aramex considers its implementation of the Code and its embedment in our processes and contractual terms establishes an ethical culture and environment that will not tolerate modern slavery in Aramex's operations or supply chain.

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

- [Aramex Code of Conduct](#)

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

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

The Aramex Human and Labour 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 Labour Rights Policy is published on our website and can be found at this link:

- [Aramex Human and Labour 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.

### **D. Training and embedding our policies and procedures**

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

- [Aramex Diversity, Equity and Inclusion Policy](#)
- [Aramex Human and Labour 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. In 2023, the Code training was mandatory for all staff and completed primarily online, with face to face learning sessions organized where appropriate, enabling 15,771 employees representing 93% of our total population who received Compliance training. Due to the inclusion of the [Aramex Diversity, Equity and Inclusion Policy](#) and [Aramex Human and Labour Rights Policy](#) staff receive specific training relevant to modern slavery and human trafficking. Having launched

our Human and Labour 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 Labour Rights Policy](#). The policy was revised and recommunicated 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 statements 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 integrated 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**

- In 2022, a blended learning model was used to increase awareness and engagement on Human and Labour Rights, where over 2,640 employees took the virtual training on Human and Labour Rights including modern slavery through our Learning Management System.
- In 2023 we mandated 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 launched an internal campaign on shaping behaviour, 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 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

Modern slavery can affect any industry and any country. To have the greatest impact on the lives of vulnerable workers, we are taking targeted action where the risks of exploitation are the most severe, salient and strategic – in line with the UN Guiding Principles on Business and Human Rights.

Our procurement and compliance teams review and approve 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.

#### **1. 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. In 2023 over 1,808 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.

#### **2. Third Party Risk Assessment:**

We assess potential suppliers against the following risk factors:

- Country risk - for example, manufacturing in countries with poor records of human rights abuse.
- Industry type – we are alert when securing services from industry sectors with poor reputations for upholding worker's rights and safeguarding their welfare.
- Nature of the workforce - for example, we recognise there is an elevated risk associated with businesses having a high dependency on low-skilled temporary work.
- Context of the supply chain - for example, taking into account the elevated risk when the supply is from countries with weak labour laws and high levels of poverty.

### **3. 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.

Moreover, all franchisees undergo an external due diligence process which includes human and labour rights.

### **Managing our relationships with third parties:**

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.

In line with the Procurement Policy that was rolled out in 2022, we continue to enhance our application of the policy to govern responsibilities internally and externally with our supplier base referring to and embedding our policies on Human and Labour Rights, Environment Management Systems, Social Involvement and Health & Safety systems into our procurement process.

### **Performance monitoring**

Aramex endeavours to enhance our performance monitoring process by embedding addition clauses in our supplier contracts allowing us to reserve the right to monitor and audit our suppliers' performance against key modern slavery-related benchmarks and policy requirements to evaluate compliance with appropriate standards.

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

Aramex's suppliers come from all across the world. Aramex recognises that this increases the risk that modern slavery practices could unknowingly become embedded in its supply chain.

We endeavour to manage and mitigate risk through Aramex's ongoing commitment to engage capable suppliers that undertake to comply with strict standards, including requirements such as:

- conduct their business lawfully, including by complying with all laws regarding slavery and human trafficking in the countries in which they do business;
- engage in practices that are not just commercially efficient, but which also see workers treated ethically and fairly;

- certify that materials incorporated into supplied products comply with the laws regarding slavery and human trafficking of the country or countries in which the suppliers are doing business;
- do not make use of forced, prison or indentured labour;
- provide workers with a safe and healthy working environment;
- take responsibility for the ethical behaviours of their supply chains.

Aramex's accountability standards mean that where Aramex's assessment of its supplier practices reveals unacceptable performance against key benchmarks, Aramex will, depending on the nature of the identified non-compliance, either engage with the relevant third-party supplier to ensure that it is urgently corrected or, if appropriate, otherwise terminate the third party supplier's engagement.

## **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 Labour 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.

As part of the Human Resources and Risk and Compliance KPI measurement we set targets and continuously monitor and measure our employee and supplier training coverage.

## **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 as a result of 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 2024 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 labour 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 2024, 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;
- Our franchisees will be included in our annual mandatory compliance training.

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

Aramex engages directly with senior members across various departments within its subsidiaries and its Human and Labour Rights Committee has representatives from the Commercial, Human Resources, Legal, Risk and Compliance, and Sustainability departments. The Human and Labour Rights Committee is responsible for preparing this Statement and ensuring 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), calling the toll-free numbers stated in our Whistleblowing Policy (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 28 June 2024.**



**Chairman**