

(FREE ENGLISH TRANSLATION FROM ARABIC LANGUAGE)

**Action Express International (AEI) -
Jordan**

Job Code of Conduct

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Article 1: Staff Job Code of Conduct Scope:

- a. Provisions of this Code of Conduct apply to all Company staff as of date of endorsement by the Company Management.
- b. Every employee shall sign a statement in which he/she undertakes to abide with provisions of this Code of Conduct. A copy of this statement undertaking is filed in the employee's personal job file.
- c. This Code of Conduct is based on principles and fundamentals of justice, equal opportunities, transparency, accountability, professional integrity, neutrality, loyalty to the Country and Company, determination to achieve the mission and goals, and assuming responsibility. The employee shall commit to the provisions of this Code of Conduct as well as its principles and fundamentals.
- d. In the event of any violation of these provisions, necessary measures and disciplinary actions shall be taken in accordance with the Company's Articles of Association.

Article 2: Main Goals of the Code of Conduct:

This Code of Conduct aims to achieve the following:

- Set ethical standards and basic rules of job ethics, high-level professional culture and values, enhance commitment of these standards, rules, and values, enforce basics of best practices through staff education and direction towards proper job ethics and self-discipline rules that govern company work and are in line with valid laws and regulations. In addition, it identifies staff job obligations and responsibilities, and explains their role in improving services and enhancing credibility.

Article 3: Staff Duties identification of all Company staff

Employee's general obligations and responsibilities

The employee shall:

- a. Perform his / her duties and assigned tasks as honest, fair, accurate, professional, and impartial as possible. The employee shall serve the goals and objectives of the Company and shall achieve its general interests only.
- b. Be keen to learn and apply valid laws and regulations without any encroachment, violation, or negligence.
- c. Devote all official duty hours to perform job functions and refrain from any activity that is not related to official duties.
- d. Seek through continuous efforts to improve performance and professional capabilities, and pursue latest updates of the Company work field. Submit proposals to improve work procedures and means to upgrade performance and assist in creating safe and healthy work environment.
- e. Refrain from any behaviors, practices or actions that violate morale and proper behaviors. In addition, refrain from abusing or provoking against other's religious beliefs inside or outside the Country.
- f. Facilitate investigation and inspection procedures conducted by competent authorities in all possible means, supply information, and respond to enquiries of investigation and inspection officials in accordance with valid laws and regulations.
- g. The employees have the right to work in an environment where they enjoy fair treatment based on respect. They are required to create and firmly-establish similar environment.
- h. All employees are required to respect all different cultures, opinions, and life styles, and to think reasonably concerning their behavior's impact on others.
- i. Smokers shall respect the right of non-smokers to work in a smoking free environment.
- j. Few abusing behaviors may constitute a form of harassment, nuisance, or discrimination. It is not permissible to have similar behavior in our Company

whether intentionally or non-intentionally. This is may incur strict disciplinary measure or even legal measures.

If you think that you become a victim of an unacceptable behavior at the workplace, kindly approach your direct manager, supervisor, or contact the Human Resources Section.

Examples of unacceptable behaviors:

- Aggressive, intimidating or threatening communication whether in writing or verbally.
- Comments that may harm the feelings of others or humiliate and degrade them similar to inappropriate advertisements and announcements, abusing comments to males or females gender, race-based opinions, or sex character annotations.
- Sexual connotation offers, sex services requests, or unwanted body touch.
- Disrespecting individuals or groups such as excluding them from participation at work or activities inside or outside work site.
- Humiliating an employee or group of employees through pointing out to their mistakes or weaknesses in public.

Article 4: Dealing with Others

a. Treatment of Customers

The employee shall:

1. Respect peoples' rights and interests without exception. Shall treat customers with respect, decency, politeness, impartiality, fairness, and objectivity without discrimination on basis of race, sex, religion, political opinion, social status, age, physical appearance, or any other discriminatory form.

2. Seek to acquire confidence of customers through his / her integrity, responses, and sound behavior at work in line with valid laws, regulations, and instructions.
3. Complete required transactions as quick and accurate as possible within his / her jurisdiction, and respond to customers' enquiries and complaints accurately, objectively, and quickly. In addition, he / she shall show reasons for non-approval or delay of transactions.
4. Provide information needed by customers regarding work activities as accurate, quick, and honest as possible without any deception or delusion. In addition, he / she shall guide customers on complaints' mechanism if needed.
5. Give priority and care to persons with disability and provide assistance and help.
6. Handle persons' documents with confidentiality in accordance with valid laws and regulations, and never misuse such information for personal purposes.
7. Refrain from any work that may affect negatively customers' confidence towards the Company.

The following general principles apply:

- Comply with policy and provisions of Competition and Anti-Monopoly Law applied at our companies in various matters.
- Identify proper trade policy to be adopted in all activities of our companies away from competitors.
- Refrain from holding any agreement competitors on any affair for the sake of defaming fair competition.
- Hold on discussions with competitors on work relations, operations and affairs such as pricing policy, terms and conditions of sale and purchase transactions, customers, vendors, markets or any commercial information.
- Should never exchange confidential information with competitors, and never look for or accept confidential information from competitors.
- Customers are always free to take their commercial decisions.

- Similar ways are followed in meetings of Associations of Chambers of Commerce or Industry as those followed in meetings with competitors.

It is your personal responsibility to abide by rules and provisions of Anti-Monopoly and Competition Law applied in our Company. If you require asking questions on Competition Law and its relationship to your work, please contact the Legal Department.

Respect of Human Rights

Our Companies observe and respect human rights in all commercial fields and activities, and at all its work sites.

Our Companies acknowledge that respect of human rights covers several fields of the Job Code of Conduct; such as to equal opportunities, safety and health at work site, data confidentiality, and environmental responsibility. Furthermore, the commercial operations and outcomes of our business relations with other parties may impact human rights.

Our Companies maintain firmly and regularly highest standards of practices at work Policies adopted seek to guarantee that no employee will be subject to discrimination or abuse, and our companies are keen to treat all staff fairly at all times.

It is anticipated that vendors and suppliers will respect, acknowledge and maintain human rights, best work practices and standards, and approved labor conditions that are in line with national legislations and international conventions.

If a potential violation of human rights arises during the supply chain of our Companies; such as but not limited to child labor, forced labor, or risky work conditions, our Companies shall take appropriate measures to the best interest of the disadvantaged individuals or societies. In addition, our Companies shall cooperate with the Governments and civil society partners whenever possible.

In the event that any violation of human rights is brought to your attention, please report such violation to your immediate boss, or contact Human Resources Section.

Anti-Corruption

Our Companies undertake to perform all our commercial transactions in a professional, honest, and fair manner.

- Our Companies shall not allow in any way any form of bribery or corruption. We fully support international and national efforts to combat bribery and corruption. We commit to abide with valid anti-corruption laws in regions of operations.
- Bribery and Corruption mean offering any item of value to a person, or give a promise or giving such item (to include but not limitedd to offering cash, gifts or entertainment activities) or requesting or receiving the same item from a different person in return of a commercial interest, a reward, or provoking to perform an inappropriate action by that person.
- The staff participating in the bribery plot shall expose our Companies to investigation, prosecution, and potential financial fines. Further, they may be accused of committing criminal offenses. In the event that you are offered or you are requested to give any form of bribery, no matter how small the amount is, you are required to reject firmly and declare the position of our Companies towards the anti corruption issue. We consider offering or receiving any form of bribery as a serious and grave case that requires disciplinary punishment.

b. Dealing with superiors

The employee shall:

1. Undertake to implement orders, directions, and instructions of superiors in accordance with the administrative hierarchy. If such orders and instructions violate valid legislations, the employee shall inform his / her superior in writing of the violation, and shall not undertake to implement such orders and instructions unless the superior stresses that in writing. In this case, the employee shall inform the Management of the violation. In

all cases, the employee shall reject implementation of instruction if the violation constitutes a contravention, felony, or a crime punishable according to the Penal Code, any other valid legislation, or Company's Articles of Association.

2. Treat superiors with respect and never try to gain preferential treatment through flattery, deception, or favoritism and nepotism.
3. Never deceive or mislead superiors, and refrain from expressing work-related information that shall affect decision-making process or work flow. He/ she shall cooperate with superiors and provide opinion, advice, and expertise in an objective and honest way, as well as availing at the superiors' disposal all information he / she acquires to the interest of business.
4. Inform his/ her boss on any encroachment, violation, or difficulty he / she may face at work.
5. Inform new immediate boss fully and accurately of all topics and documents as well as pending issues to ensure continuity of work.

c. Dealing with Colleagues:

The employee shall:

1. Treat colleagues with respect, decency, and honesty, maintain intact and amicable relations with them without any discrimination, respect others' privacy, and refrain from misuse of personal life information for the sake of offending them.
2. Cooperate with colleagues, exchange opinions of high level of professionalism and objectivity, provide assistance, whenever possible, to solve problems they face at work, extend positive attitudes among colleagues to help upgrade performance, improve work environment and enroot sound institutional culture of the Company.
3. Refrain from any mis-conduct, practices or unethical behavior that violate public morale and sound conduct. In addition male employees shall respect females; being a colleague or a partner at work. On the other hand, female employees shall respect males; being a colleague and a partner at work.

d. Dealing with Subordinates:

The employee shall:

1. Develop capacities of subordinates, assist and motivate them to improve their performance. He / she shall be a good example and model for the subordinates through commitment with valid laws, regulations, and instructions.
2. Transfer knowledge and expertise to the subordinates, and encourage them to increase knowledge exchange and expertise among themselves.
3. Supervise the subordinates, hold them accountable, assess their performance in an objective and unbiased way, and provide them with training and development opportunities according to valid related regulations and instructions.
4. Reject any pressure by a third party that may lead to a preferential treatment to the subordinate.
5. Respect subordinates' rights, and cooperate with them in high level of professionalism, unbiased and non-discriminatory approach.
6. Commit that all instructions to the subordinates shall be in writing in case he / she received a written remark stating that issued orders and instructions contradict with valid legislations.

Article 5: Confidentiality and Disclosure of information:

The Employee:

- a. Shall not disclose official information, documents, and texts received or learned about during work whether written, verbally or electronically. They remain confidential by nature even after he /she quits work service, unless the Company for such obtains a written approval.
- b. Refrain from making any comment, statement, or intervention on pending or under discussion issues by the Management.
- c. Inform the Personnel Department if he / she is requested to provide a testimony at competent courts.

- d. Disclose fully and accurately of official information, if it requires disclosure by virtue of position.

Article 6: Gifts, Benefits, and Privileges:

- a. The employee shall not accept or request any type of gifts, hospitality items, or any kind of benefits, whether direct or indirect. Such action imposes direct and indirect impact on employee's objectivity during work, and may affect decision quality, or may oblige him / her to undertake doing something in return of acceptance.
- b. The employee is not allowed, in any situation to accept gifts of all types, even if he / she is in a position that prevents from accepting the gifts, hospitality items or other types of benefits, or if he / she believes that accepting specific types of gifts shall reflect positively on the Company, unless the gift carries the logo of the offering company and the gift value does not exceed 25 Jordanian dinar, except solid models of airways and shipping companies. The employee shall inform immediate boss in writing that the gift, hospitality item or other types of benefits have been rejected.

Article 7: Conflict of Interests:

The employee:

- a. Shall refrain from performing any activity that may lead to real, visible, or potential conflict of interests between personal interests and his / her job obligations and tasks.
- b. Shall inform immediate boss in writing and immediately if conflict of interests arises between him / her and any other person when dealing with the Company, or if conflict of interests arises between the personal interests and the Company's interests, or if the employee faces pressures that contradict with official duties or may arise suspicions on the objectivity at work. The type of relationship and conflict of interests shall be clarified. The immediate boss shall take necessary needed measures. In all cases, interests of the Company shall be considered in solving such conflict.

- c. Shall not use and benefit from his / her job directly or indirectly to gain financial returns or any item of value for personal interest of his / her family members.
- d. Shall not use or utilize information obtained during official work or after work termination on the Company as a way to achieve personal benefits for him / her or others directly or indirectly or to abuse others. In addition, the employee shall not disclose information to give unfair or unrealistic privilege to other parties.
- e. Shall avoid establishing close relations with persons or companies that their interests depend heavily on his / her decisions or on the decisions of his / her section.
- f. Shall not accept any job offer after work quit. The employee is prohibited to give any information he / she acquired during work that may affect the Company's work or may cause loss of a customer to the interest of other companies. Further, the employee, after leaving work, is not allowed to offer advice or guidance to customers of these companies relying on information he / she learned related to their programs and policies.
- g. The immediate boss shall inform the employee intending to quit work of the obligations stated in this article.

Article 8: Staff Worthiness, Merits, Competition, and Justice:

The employee shall:

- a. Take the relevant measures for the selection, appointment, promotion, training, rewarding, evaluation, or transfer of employees or any other action related to their work in a transparent, absolute integrity, away from any considerations related to kinship, friendship, or benefiting concepts, and without discrimination based on gender, race, age, or religion. Principles of worthiness, merits, and competition shall be applied as well as full adherence with approved work authorities and procedures.
- b. Inform the immediate boss in writing on any violation of the valid laws, regulations, and instructions he / she know about during work concerning selection, appointment, promotion, training, rewarding, evaluation of employees etc. The immediate boss shall verify accuracy of notification, and take necessary measures in coordination with concerned entities to ensure

- remedy of situation in accordance with laws, regulations and approved procedures.
- c. Refrain fully, whether directly or indirectly from offering any preferential treatment to any person through favoritism and nepotism (*Wasta*).
 - d. Competition laws (usually called Anti monopoly laws) ban behaviors that control or curtail competition. Such laws aim to protect structure of competitive markets in order to enable companies operate on fair competition, which contribute to projects' development, enhance efficiency, upgrade quality, and offer consumers with wide range of alternatives.
 - e. Competition laws are controversial. They differ from one country to another and their scope may expand outside the country. These laws do not cover formal or written conventions and agreements in particular, but may cover informal discussions, texts, electronic mails with competitors or customers. Non-compliance with these laws may lead to severe penal actions with respect to our companies and staff as well as fines and imprisonment.

Article 9: Protection of Public Funds, and Company's Interests and Property

- a. Protection of the funds, interests, and property of the Company and non-negligence of any of its rights is obligatory. In addition, the employee shall inform the immediate boss on any encroachment of the Company's funds and property, or any misuse action that may harm the interest of the company.
- b. Non-use of the Company's property for personal benefit or to promote goods and services for personal or third party's interest.
- c. **The employee who is given a PC for business use shall consider the following:**
 1. Take all necessary measures to protect the personal computer.
 2. No downloads are allowed prior to consultation of IT department.
 3. Ensure that all systems are switched off prior to exit of work place.
 4. Maintain confidentiality of information stored through use of private password, and never disclose the password.

5. Non-use of the PC for entertainment purposes, and never download games and entertainment items.
6. Never access others' computers and try to obtain information from them.
7. The PC is used for the development of skills and capacities along with work purpose.
8. Non-use of the PC for personal use.
9. Efficient use of printers.

d. The employee who is authorized internet access shall consider the following:

1. Commit to use internet access for business purposes, including development of work related skills and capacities for work purpose.
2. Respect requirements, terms, and conditions of intellectual property rights as well as considering use license terms and conditions.
3. Consult immediately the IT department on any wrong and improper signs through internet use.
4. Never download texts and images containing unethical, racist items, political opinions, violent and hatred provocative items, or any illegal activities.
5. Never download items that do not relate directly to work, such as videos and multimedia files, and feature videos, sound and song clips, music and others.
6. Never use the PC and internet access for accessing and spying on others' equipment and systems. In addition, never use the internet to send confidential or political items that threaten and disturb others.

e. The employee who is assigned an e-address shall consider the following:

1. Never use the email to create, and distribute messages that contain promotional materials, personal or unethical information, political opinions, racist remarks on religious beliefs or practices, or gender-based,

age or ethnic remarks. If any staff receives a message of similar content, the competent IT unit shall be notified immediately.

2. Never forward received messages that contain jokes, images, and videos with pictures.
3. Never forward incoming mail that contains viruses or files with suspected viruses. In such case, IT department needs to be contacted.

Article 10: Staff Rights

The Company shall:

- a. Identify clearly the employee's tasks, duties, responsibilities and expected outcomes.
- b. Treat the employee fairly in all job situations based on merits, competitiveness, and equal opportunities.
- c. Provide reasonable and safe work conditions that ensure non-discrimination at work site.
- d. Provide proper training opportunities and continuous training to improve career development in accordance with the Company's internal bylaw and as needed.
- e. Ensure freedom of expression in accordance with the law and the provisions of this Code of Conduct.
- f. Guarantee the employee's right to submit a complaint and express grievances for a wrong decision taken against him / her, in accordance with the provisions of the bylaw.

Article 11: General Provisions

- a. The employee shall read, be familiar of the content, and comply fully with the provisions of this Code of Conduct.
- b. The Company shall assist its employees and clients to learn about this Code of Conduct.

- c. The Company's Board of Directors, managers, and heads of sections are entrusted with full implementation of the provisions of this Code of Conduct.