

I. Competition compliance

DXI Logistics LLC believes in operating in a free and open market. DXI is fully committed to complying with the UAE Federal Decree-Law No. 36 of 2023 on the Regulation of Competition and its implementing regulations, and with the competition laws of every country in which it does business, including through its agents and partners. Competing on the merits drives us to be both efficient and innovative.

II. What is a cartel

A cartel is any agreement, concerted practice or arrangement between competitors to fix prices, rig bids or tenders, divide or share markets or customers, or otherwise restrict competition. Cartel conduct is regarded as the most serious breach of competition law and may lead to significant fines and, in some jurisdictions, criminal penalties.

III. Prohibited conduct

Neither DXI nor its employees may engage in any activity prohibited by applicable competition law. In particular, employees must not communicate with a competitor, in writing, electronically or verbally, in any way that attempts to:

- Fix, stabilise or control prices, rates, surcharges, credit terms, discounts or rebates.
- Allocate contracts, tenders, markets, customers or territories.
- Boycott particular customers or suppliers.
- Limit the supply of any service.

DXI will not abuse any dominant position it may hold in a market. If there is any doubt about whether a communication, contract or commercial strategy is lawful, legal advice must be obtained first.

IV. Ethical behaviour

DXI takes a zero-tolerance approach to cartel conduct, in line with the FIDI Anti-Trust Charter. In all business dealings DXI acts professionally, fairly and with integrity, and expects the same from its partners.

V. Legal compliance

DXI employees and partners must be aware of, and comply with, the competition laws and regulations of every jurisdiction in which they operate, including those relating to cartels and to trade association activities.

VI. Communication and training

Compliance and Human Resources provide training on this policy to new employees during induction and periodically to existing employees. Training is mandatory for relevant employees, including management, sales, pricing and procurement staff, and anyone with contact with competitors or trade associations. This policy is communicated to employees, agents, clients and suppliers.

VII. Monitoring and reporting

Compliance reviews the operation of this policy annually, and the review is approved by management. Suspected breaches must be reported immediately to management or the Compliance function and will be investigated.

VIII. Breaches of the policy

A breach exposes DXI to serious financial penalties and exposes the individuals involved to personal liability, which may include fines and, in some jurisdictions, imprisonment or disqualification. Any breach is treated as gross misconduct and may result in disciplinary action up to and including termination of employment.

Approved by:

Jerry Nazzal
Group President

This policy is effective from Oct. 2026 and will be reviewed by Oct. 2027, or earlier if required by changes in UAE law or DXI operations.