

I. Introduction

DXI Logistics LLC takes a zero-tolerance approach to bribery and corruption and is committed to conducting its business honestly and ethically. Bribery, including bribery in the private sector, is a criminal offence under the UAE Federal Decree-Law No. 31 of 2021 promulgating the Crimes and Penalties Law. DXI also complies with UAE anti-money-laundering legislation and with applicable foreign anti-bribery laws.

II. Purpose

To establish controls that ensure compliance with all applicable anti-bribery and anti-corruption laws, and that DXI's business is conducted in a socially responsible manner.

III. Scope

This policy applies to all individuals working for or on behalf of DXI at every level, including directors, managers, permanent, fixed-term and temporary employees, consultants, contractors, trainees, agents and any other associated person, wherever located.

"Third party" means any individual or organisation you deal with in the course of your work, including clients, suppliers, agents, advisers, customs and other government officials, and public bodies.

This policy covers: bribes; gifts and hospitality; facilitation payments; political contributions; and charitable contributions.

IV. Bribes

Employees must never offer, promise, give, request or accept any payment, gift or other advantage intended to improperly influence a business decision or the performance of a public or private duty.

V. Gifts and hospitality

Employees may not give or accept gifts or hospitality from a third party unless they are modest, infrequent, given openly, and approved in writing by management. Gifts of cash or cash equivalents are never permitted. All gifts and hospitality given or received must be recorded.

VI. Facilitation payments

Facilitation payments (small unofficial payments to speed up a routine government action, such as customs clearance) are a form of bribery and must not be paid. The only exception is where an employee faces an imminent threat to their personal safety or liberty; in that case the amount must be kept to the minimum, recorded, and reported to management immediately. Finance reviews all such reports.

VII. Political and charitable contributions

DXI does not make donations, in cash or in kind, to political parties or candidates.

Charitable support is encouraged, but must be legal, made to registered UAE charities or recognised organisations, approved in advance by management, recorded, and never used to disguise a bribe.

VIII. Employee responsibility

Every employee must read, understand and comply with this policy, and avoid any activity that might lead to or suggest a breach of it. Employees must report to their line manager or to management, as soon as possible, any request for a bribe or any suspected breach. A breach of this policy may result in disciplinary action up to and including dismissal for gross misconduct, and may be reported to the authorities. DXI may terminate its relationship with any third party that breaches this policy.

IX. Record-keeping

DXI keeps accurate financial records and internal controls that evidence the business reason for all payments to third parties. All gifts, hospitality and expenses must be recorded and claimed in line with DXI's expenses procedures. No accounts may be kept "off-book" to facilitate or conceal improper payments.

X. Protection for those who speak up

DXI encourages openness and will support anyone who refuses to take part in bribery or raises a genuine concern in good faith, even if it turns out to be mistaken. No one will suffer dismissal, disciplinary action, threats or other unfavourable treatment for doing so. Any such treatment should be reported to management immediately.

XI. Training and communication

Training on this policy forms part of induction for all new employees, with regular refresher training. Employees confirm their acceptance of this policy annually. DXI's zero-tolerance approach is communicated to suppliers, contractors, agents and business partners at the start of the relationship and as appropriate thereafter.

XII. Responsibility, monitoring and review

Top management has overall responsibility for this policy. The Operations Manager has day-to-day responsibility for implementing it and for monitoring its use and effectiveness. Internal controls are audited regularly. This policy is reviewed annually and may be amended at any time; it does not form part of any employee's contract 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.