



مجموعة الفردان  
Alfardan Group

# CODE OF CONDUCT

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## CODE OF CONDUCT

### Message from our Chairman

Dear colleagues,

The foundation of Alfardan Group is built on the family values instilled in us from the very beginning. My father Ibrahim Alfardan was one of the leading pearl traders in Qatar, distinctively recognized by his integrity and expertise, trust, and honesty. By remaining true to our roots and honouring our tradition of high standards, Alfardan Group continues to be a company that our clients and businesses can confidently trust.



Decades of perseverance and an uncompromising commitment to excellence have contributed to Alfardan Group's rise to the top as one of the most successful family-owned conglomerates in the Arabian Gulf.

To uphold our family values and brand promise to satisfy and exceed desires for an exclusive experience, we constantly aim to act with integrity. For any decision we have to take, we fully integrate ethical principles. Integrity is a commitment that must guide our behaviors beyond mere compliance with law and regulation, driving us to make the right choice when facing any situation.

This Code of Conduct contains the principles that guide us. Each of us needs to know, understand and apply these principles in our daily work, regardless of our function in the company. This reference document is here to support everyone at Alfardan Group so that we can remain true to our commitments to people, customers, employees, partners, stakeholders, and society at large.

### HUSSAIN IBRAHIM ALFARDAN

Chairman

Alfardan Group

## Message from our President & CEO

Dear colleagues,

At Alfardan Group, we are driven by our shared vision to achieve success; fueled by our passion and family values. Our founder and Chairman, Hussain Ibrahim Alfardan, has built Alfardan Group on the values of trust, distinction, and a dedication to service excellence. His deep-rooted integrity has always been his currency, which created a bond of dedication and distinction that can be found in each and every Alfardan business interaction.



With its corporate values revolving around passion, mastery, evolution, trust, and distinction; the Group will surely continue its journey to success. Our continued success depends on our ability to maintain our strong reputation and preserve the trust of our customers, stakeholders, and communities.

This Code of Conduct is designed to help you make the right decisions. It provides a guideline for how we conduct ourselves. It reflects not only our guiding principles but also your personal accountability to sustain our reputation for ethical behavior.

I would like you to read the Code and act according to the highest ethical standards and I urge you to raise any concerns through the channels outlined in this Code. Our Company's reputation depends on your commitment to honest and ethical behavior.

**OMAR HUSSAIN ALFARDAN**

President and CEO

Alfardan Group

## Our Core Values

The Code of Conduct of the Alfardan Group (its affiliates and subsidiaries) (together the **“Alfardan Group”**) is a statement of our core corporate values which have been derived from our founder and Chairman, Mr. Hussain Ibrahim Alfardan. Driven by a passion for quality and excellence, Alfardan Group’s core values of passion, mastery, evolution, trust and distinction have been the guiding principles for its continued success in the region.

## Our Code of Conduct

Our Code of Conduct is intended to ensure that the Alfardan Group, its employees and representatives never lose sight of our core values and the culture that have made this Group what it is today. The Code of Conduct acts as a guiding principle and applies to everyone in the Group and we expect our third parties, including suppliers and contractors, to act in a way that is consistent with the principles and values of our Code of Conduct when conducting business with us.

Each and every one of us should see ourselves as the stewards of the Alfardan Group and its excellent reputation in the region and realize that we have a significant role in upholding and enhancing that reputation by acting with integrity, professionalism and respect.

## Our Aim

The Alfardan Group aims to seize opportunities in respective business sectors, increasing our market share, whilst achieving the highest standards of integrity, customer satisfaction and employee motivation.

The following principles form the basis of our Code of Conduct and must be abided by Alfardan Group’s employees and representatives:

### 1. ACT WITH INTEGRITY

Integrity is an essential resource for all employees and representatives of the Alfardan Group and it represents the highest level of guidance of our Code of Conduct. All employees and representatives of the Alfardan Group are expected to demonstrate your commitment to our values, policies and the law. Managers, in particular, are expected to demonstrate highest standards of integrity in all dealings with employees, customers, suppliers and the community.

Managers are expected to develop their employees' ability and commitment to make sound ethical judgements and should communicate the seriousness of the Group's expectations for ethical conduct and their own personal support of these expectations. Ethical leadership includes both promoting a work environment that encourages employees to voice concerns or otherwise seek assistance if faced with potentially compromising situations and supporting those who speak out.

Notwithstanding any additional policies that may be in place for individual Business Units within the Alfardan Group to cater for certain practices related to their business, as employees and representatives of the Alfardan Group you are expected to:

- **Maintain high standards.** When someone violates the principles of this Code of Conduct or acts in a manner which is contradictory to integrity at Alfardan Group, its policies or the law, this may result in disciplinary action, up to and including termination of employment. Certain violations can have additional consequences, such as being reportable to local Government authorities, these violations include, but are not limited to, the following:
  - physical assaults;
  - threats to safety and health;
  - theft, fraud, embezzlement, misuse or destruction of someone else's or the Group's property, including money, office equipment or any other items of value;
  - workplace harassment (whether verbal, physical, visual, electronically transmitted, or written) of co-workers, clients, visitors etc;
  - possession of firearm while on any Alfardan premises or while engaged in company business;
  - falsification of any Alfardan Group or client documents; and
  - assisting anyone who you know or have reasonable grounds to suspect is involved in money laundering or committing any other crimes or engaging in any other conduct which rises to the level of criminal behavior under applicable laws.
- **Whistleblower Policy.** Under the Whistleblower Policy Alfardan Group gives freedom and allows its employees and representatives to report to the management the facts and put a stop on all unethical immoral or illegal acts or behavior. Every employee and representative of Alfardan is expected to report any alleged misconduct or violation of the Code of Conduct or any applicable law or regulation. If the violation is by yourself, the fact that you have

reported the violation will be given consideration in determining appropriate disciplinary action, if any. In many cases prompt reporting of a violation can substantially reduce the adverse consequences of a violation.

If you become aware that another employee, of whatever level of seniority, has in all likelihood, violated the Code of Conduct, or any applicable, law or regulation, applicable to the Alfardan Group or any of its business, you have a duty to report that violation, so that the Alfardan Group can take steps to rectify the violation and/or prevent its occurrence or recurrence.

How to raise a concern? Your manager is usually the best place to start. However, when it is not possible to raise or resolve an issue or a violation with your immediate manager, then all concerns should be reported using the form at the end of this document. Such reports will be treated confidentially to the extent possible, and you will not be subject to retaliation for reporting a suspected violation.

- **Cooperate.** Reports of misconducts or violations of our Code of Conduct are reviewed, investigated (if required or appropriate) and treated confidentially to the extent possible to conduct a fair and appropriate investigation. If you are the alleged violator of the Code of Conduct, then you are expected to participate fully and honestly and cooperate with investigations and audits. You should not act in a manner that would interfere with an investigation, including destroying or fabricating evidence, intimidating witnesses, or improperly disclosing information in a manner that impedes a fair review.

Disciplinary measures will depend on the circumstances of the violation and will be applied in consultation with HR Department. Disciplinary action will be taken against:

- any employee who authorizes, directs, approves or participates in violations of the Code of Conduct;
- any employee who has deliberately failed to report violations of the Code of Conduct, who has concealed violations of the Code of Conduct or who has deliberately withheld relevant information concerning a violation of the Code of Conduct;
- any employee who retaliates, directly or indirectly, or encourages others to do so, against any other employee because of a report by that employee of a suspected Code of Conduct violation; and



- any manager who, under the circumstances, had knowledge about a violation by people under his or her supervision and did not act promptly to report and correct it.

In addition, persons who violate the law during the course of their employment are subject to criminal and civil penalties, as well as payment of civil damages to the Alfardan Group or third parties.

- **Act Professionally.** Alfardan Group's relations with its customers, clients and other stakeholders are founded on the principles of honesty, credibility and professionalism. You are expected to act with integrity, diligence and competence in order to respect these principles. As an employee and representative of the Alfardan Group, you should ensure that you demonstrate professionalism in your workplace and whenever or wherever you represent the Alfardan Group.

You must make completely factual and truthful statements about our own products or those of our competitors, whether in advertising or directly to customers or others. The making of false or misleading statements about our competitors is inconsistent with our reputation for integrity and can be very harmful to the Group's reputation.

### **Financial Statements and Accounts**

Furthermore, and with respect to the Alfardan Group's financial records, it is not the exclusive responsibility of the Group's accounting personnel to ensure that the Group's accounting and financial records are accurate and complete. You must ensure that the accounting and financial records of the Group meet the highest standards of accuracy and completeness.

If you have reason to believe that any of the Group's books and records are not being maintained in an accurate or complete manner, you are expected to report this immediately by using the form at the end of this document. Similarly, you should if you feel that you are being pressured to prepare or destroy documents in violation of Group policy.

You are responsible for ensuring that transactions are reported accurately, completely and in reasonable detail if you are involved in supplying any kind of supporting documentation, determining account classification or approving transactions.

All transactions must be recorded appropriately to ensure full accountabilities for all assets and activities of the Group, and to supply



the data needed in connection with the preparation of financial statements.

If you are involved in the preparation any of the Group's Business Units' financial statements, you must do so according to the Groups' generally accepted accounting principles and other applicable accounting standards and rules, so that the statements fairly and completely reflect the operations and financial condition of the Business Unit.

### **Violations of the principles of professionalism**

The following includes, but is not limited to, acts or omissions, which will be treated as violations of this principle of professionalism:

- breach of your contractual or legal obligations;
- immoral or unethical acts;
- gossip or defamation of character;
- deception on any matter related to your duties;
- failure to satisfactorily meet the requirements of the position;
- compliance violation or any act which violates any Alfardan Group policy;
- obtaining employment on the basis of false or misleading information;
- unauthorized alteration of time records for oneself or other employee(s);
- failure to maintain accurate time and attendance records;
- excessive or unexcused absenteeism or tardiness;
- disruption of the work environment;
- refusal to follow management's instructions concerning a job related matter;
- conduct which unnecessarily causes another employee, client or vendor of the Alfardan Group's embarrassment, loss of dignity, feelings of intimidation or loss of opportunity, including all forms of discrimination and harassment;
- Insubordination.

### **Conduct Outside of Work**

The Group does not seek to dictate how employees conduct themselves in their personal lives outside of work. However, unlawful, anti-social or other conduct by employees which may jeopardize the Group's reputation or position will be dealt with through a disciplinary procedure.

## **Drugs & Alcohol**

It is the Group's policy that all of its operations operate a drug-free and alcohol-free environment. The misuse of drugs, both legal and illegal, while on Group premises or business, interferes with a safe, healthy and productive work environment and is prohibited. Specifically the Group prohibits the use, possession, distribution, or sale of drugs on its premises, in its vehicles, and while conducting business.

Consumption of alcohol during lunchtime or during meal breaks for shift personnel is strictly forbidden. No employee may conduct the Group's business while under the influence of drugs or alcohol. Failure to comply with this policy will lead to disciplinary actions.

## **Smoking**

The Group adheres to all local ordinances regarding smoking prohibitions or limitations. Additionally, the Group adheres to any restrictions imposed by the building management of facilities occupied by any of the Group's entities. In locations where smoking is prohibited or restricted, such limitations will be strictly enforced.

Additionally, if violations are found, the employee(s) responsible for creating the violation will be subject to disciplinary action.

## **Dress Code**

All employees are required to be appropriately dressed whether at Group's office locations or at a client location. All employees are expected to use their discretion and good judgment in adhering to the guidelines as outlined above.

If employees report to work improperly dressed or groomed, managers may instruct them to return home and change clothes. Employees sent home because of inappropriate attire or personal hygiene will not be tolerated.

Failure to adhere to this policy could result in disciplinary action up to and including termination.

## **Communication**

Employees are expected to give one another accurate and timely information about business issues. Communication should be courteous and professional. Rudeness should not be tolerated and accepted.

- **Ensure there is no Harassment or Intimidation.** Alfardan Group employees and representatives are expected to ensure the preservation of a work environment free from intimidation or harassment. Any form of harassment of employees by co-workers, supervisors or outsiders is prohibited.

Harassment includes behavior, whether in person or by other means, such as email, that is offensive to individuals or groups, including unwelcome sexual advances, uninvited suggestive remarks of a sexual nature, sexist or racist comments, religious slurs and ethnic jokes, if such behavior interferes with an employee's work performance or creates an intimidating, hostile or offensive work environment.

Any harassment that violates the Group's core values or any applicable law or regulation should be reported using the form at the end of this document as it will be met with the appropriate disciplinary action, up to and including termination.

## 2. STAKEHOLDER ENGAGEMENTS

- **Customers:** Alfardan Group's unwavering objective is to deliver products and services that satisfy customers and meet their expectations. All Alfardan employees and representatives should ensure that in their interactions with our customers, we listen to their needs and apply good judgement in compliance with our policies and this Code of Conduct in dealings with Customers.
- **Government Entities or Government Owned Entities:** Alfardan Group engages with government-owned or controlled entities which include, but are not limited to, government departments, ministries, branches, schools, hospitals, utilities and other organizations that provide public services. Dealing with such entities may raise unique business and compliance issues, and you must follow established processes and controls set out in Alfardan Group's Anti-Corruption and Anti-Bribery Policy to address them.
- **Suppliers:** Alfardan Group works with many suppliers and contractors worldwide, purchasing both for its internal use and in support of client and customer engagements. In general, all purchases from such suppliers and all business engagements with such third parties must be conducted in accordance with the Alfardan Group Supplier's Code of Conduct.

- **Competitors:** It is imperative that in today's highly competitive environment, Alfardan Group's employees and representatives understand and exercise principles of fairness and professional integrity when acquiring information about our competitors or their business. You should only gather information about competitors in a legal and ethical manner and from legitimate sources for legitimate purposes. Do not engage in or facilitate any improper or illegal practices, such as wiretapping, surveillance, hacking, bribery, theft, trespassing, misuse of social platforms, to gather intelligence or obtain trade secrets or confidential or sensitive information. Treat information about other organizations and individuals with sensitivity and discretion.
- You cannot collude with our competitors, on prices you will charge customers, nor can you agree to divide customers or markets by territory, or to boycott certain customers, suppliers or competitors, with the intent to unfairly prevent, restrict, reduce, or distort competition within the relevant market. Even where there is no formal written agreement, the mere exchange of information can create the appearance of an informal understanding.
- **Community:** Alfardan Group is committed to making a difference in the communities where we live and work. You are expected to support and get involved in the Group's initiatives that strengthen communities.
- **Media:** No statement involving any aspect of policy, results, projections, governance or strategy that has either a direct or indirect impact on the Alfardan Group may be made by either a Business Unit or any employee or representative of the Group unless reviewed and approved by the President or his delegates. Other statements may be made with the written approval of the Chief Operating Officer but with the clear corporate guideline of minimum statements to the media unless there is a clear, constructive purpose and benefit in doing so.

### 3. DIVERSITY, EQUAL OPPORTUNITY AND INCLUSION

The Alfardan Group seeks, values and appreciates diversity among its employees, recognizing that a mix of people enriches our Group and is essential to creativity and business growth. As a Group, we are committed to equal opportunity and unbiased treatment of all individuals based on job-related qualifications and without regard to race, color, gender, age, national or ethnic origin, religion, creed, sexual orientation, marital status, citizenship, disability status or any other basis prohibited by law. You should support the Group's commitment

to diversity and equal employment opportunity. Any discriminatory treatment of employees or contractors that is a violation of our Group's values or the law should be reported using the form at the end of the document and it will be met with appropriate disciplinary action, up to and including termination.

It is because of the Alfardan Group's commitment to encouraging a diverse and inclusive work environment that the Group has committed to adopting the UN Global Compact and its principles as part of our culture and day-to-day activities of business.

All employees and representatives of the Alfardan Group should uphold the elimination of discrimination in respect of employment and occupation. Discrimination in employment mean treating people differently or less favorably because of characteristics that are not related to their merit of the inherent requirements of the job (e.g. race, age, disability, gender etc.)

Business Units and Managers in coordination with HR Department, in particular, should:

- On need basis, undertake initiatives, trainings and programs to implement procedures which make sure that qualifications, skill and experience are the basis for recruitment, placement, training and advancement within the Group; and
- On need basis, provide staff with training on disability awareness and reasonably adjust the physical environment to make the workplace accessible for all.

#### **4. RESPECT FOR HUMAN RIGHTS**

The Alfardan Group places great importance on conducting business in a way that respects human rights. Our commitment to upholding human rights shapes how we do business in the region. The Group is committed to respecting internationally recognized human rights. Our goal is to create positive impacts for people, society, and business, while mitigating risk and preventing harm. To accomplish this, we must prioritize communication, clarity and accountability across the Group and ensure alignment with the UN Global Compact.

All Business Units of the Alfardan Group should ensure the following, and require the same to be adhered to by their suppliers and contractors:

- implement policies that are aligned with Qatar Law and internationally recognized human rights standards.

- elimination of all forms of forced and compulsory labor.
- abolition of child labor.
- Provide decent, safe, working and living conditions and raise the quality of life and work for all its employees.

Employees and representatives of the Alfardan Group should be vigilant and notify using the form at the end of this document if you suspect, experience or observe any behavior by another employee, contractor, or supplier of the Alfardan Group, that fails to meet the standards of respect for human rights set out in this Code of Conduct or any other Group policy.

## 5. ENVIRONMENT

The Alfardan Group is committed to conducting business in a way that is environmentally responsible and complies with applicable environmental permits, authorizations, laws, regulations and standards. All Alfardan Group employees and representatives are expected, as far as reasonably practicable, to promote reuse and recycling practices while conducting their business or in the course of their employment at the Group. You are also expected to support waste reductions, material recycling, and safe disposal of hazardous materials in our workplace and the communities where we conduct business.

Business Units within the Alfardan Group are also expected to ensure and require that their suppliers and third-party contractors also take appropriate measures to ensure, improvement in the Group's carbon, energy, water and waste footprint and prevent environmental degradation. Business Units are encouraged to implement systemic application of risk assessment (hazard identification, hazard characterization, appraisal of exposure and risk characterization), risk management and risk communication in their business decision making processes.

**Climate Change.** At Alfardan Group, we recognize the threats posed by climate change to the environment and natural resources. We support the objectives of the United Nations Framework Convention on Climate Change and its work to facilitate global agreements aimed at reducing GHG (greenhouse gas) emissions.

We urge all our Business Units to take steps to reduce our environmental footprint, support the transition to a lower carbon economy, and invest in climate change mitigation and resilience. We



are committed to establish strategies and programs to reduce the carbon footprint of our operations, supply chain and products by improving energy and water efficiency and increasing our use of renewable energy.

## 6. PROTECTION OF CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY RIGHTS

**Confidential Information and Trade Secrets.** All Alfardan Group information, unless approved for public distribution, is by default considered confidential and must be protected. All employees and representatives of the Group have a responsibility to safeguard Alfardan Group related information and the confidential information of our employees, customers and third parties.

As an employee and representative of the Alfardan Group, you shall ensure compliance with the following:

- You must protect confidential information and trade secrets and prevent such information from being improperly disclosed to others inside or outside the Group.
- You may learn, to a greater or lesser degree, facts about the Group's business, plans, operations or "secrets of success" that are not known to the general public or to competitors. Sensitive information such as customer lists, the terms or fees offered to particular customers, marketing or strategic plans, or proprietary or product systems developments are examples of the Group's confidential information or trade secrets. Similarly, during the course of performing your responsibilities, you may obtain information concerning possible transactions with other companies or receive confidential information about other companies. Such information is not to be disclosed to others outside the Group and neither shall you use any such information for your own or someone else's benefit.
- Within the Group, confidential information or trade secrets should be divulged only to other employees who need the information to carry out their duties and responsibilities associated with their employment in the Alfardan Group.
- You must not disclose to the Group or be asked by any employee of the Group to reveal, confidential or proprietary information or trade secrets of others. More specifically you are not permitted to possess or circulate improperly obtained confidential or proprietary



information or trade secrets belonging to a competitor.

- You should maintain confidentiality of sensitive employee information, such as salary, bonus or performance appraisal data. These obligations apply both during and subsequent to your employment with the Group. You must be careful not to discuss such matters with family members, business or social acquaintances, or in places where you can be overheard, such as taxis, elevators, the Group's cafeterias or restaurants. In addition, you should not communicate or transmit confidential or sensitive information through external online communications services, such as the Internet.
- Immediately report suspected theft or abuse of confidential, proprietary or trade secret information using the form at the end of this document.
- You are responsible for safeguarding the privacy, confidentiality and security of customer data entrusted to the Group and comply with all local regulations and laws related to consumer privacy and data protection. Managers are expected to familiarize themselves and their employees at all levels with our Customer Privacy Guidelines, to ensure protection of such data in every aspect of our business.

**Intellectual Property.** Alfardan Group's intellectual property intangible assets contribute to our ability to effectively conduct our business and to grow goodwill while achieving our business objectives. These intangible assets include, or may include our Group apps, brands, business information, copyrights, financial data, industrial designs, innovative ideas, inventions, know-how, patents, software, trademarks, and all proprietary information owned by Alfardan Group or made by Alfardan Group employees.

Alfardan Group employees and representatives have an obligation to:

- strengthen and protect all trademarks belonging to the Group, copyrights and patents. Our logos and the name "Alfardan" are examples of the Group's trademarks. Business Unit publications and even software programs developed for or by Business Units are the types of material that can be protected by copyrights or otherwise. In addition, in performing your responsibilities, you sometimes may receive or develop information, practices, methods, written materials, programs or other works. In other cases, you may develop or create works that are not part of your specific job-

related responsibilities but that arise from information or resources that are available to you in connection with your employment. These creations are patentable and belong to the Group. Such "intellectual property" may not be tangible like our buildings or equipment, but it is among the most valuable of the Groups assets, which you are expected to protect. When you leave the Group, for whatever reason, you must return any and all of the Group's intellectual property and other work products that are in your possession, including any copies.

- use the Group's trademarks properly and consistently, ensuring that others do not take advantage of the Group's goodwill and brand investments, and for advising senior management of infringements by others. If you are unsure about a proposed use of the Groups trademarks, copyrights or patents, you should consult the Legal Department.
- not knowingly infringe upon the intellectual property rights of others. Whether preparing advertising or promotional materials using the name or printed materials of another company or operating a software program on a Group personal computer, you must ensure that the use of the trademarks, copy- righted materials and other intellectual property of others is made properly and only under license or with prior permission. For example, you may not copy software or bring in software programs from home. Only software properly licensed by the Group is permitted on Group computers.

## **7. CONFLICTS OF INTEREST**

All employees and representatives of the Alfardan Group are expected to act in the best interest of the Group and its customers. You should avoid conflicts of interest and never use your position, employment or Group assets for personal gain.

A conflict of interest arises when your personal interests interfere with your job or ability to make objective decisions on behalf of the Group.

- You must be vigilant to any situation that could jeopardize the trust that you hold as an Alfardan employee and avoid any kind of conflict between your personal interests and those of the Alfardan Group.
- You may not, either directly or indirectly, assist or engage or be interested in any other business in any capacity or any other occupation or activity whatsoever, which the company may

reasonably accept to hinder or interfere with the performance by the employee, or conflict with, his or her duties.

- You may engage in outside activities that do not conflict with the interests of the Group, interfere with the responsibilities of its employees, or damage or misuse the reputation, trademarks, relationships, confidential information or other property of the Group.
- The Group has adopted these guidelines to protect both the Group and employees against conflicts of interest and from situations that create a perception of impropriety. From time to time, situations will arise that are not clear-cut. If you are uncertain about the propriety of your conduct or business relationships, consult your Line Manager or the Audit and Compliance Department.
- You should never use your position with the Group, or information acquired during your employment, in a manner that may create a conflict - or the appearance of a conflict - between your personal interests and the interests of the Group. You also should be aware that actual or potential conflicts of interest can arise not just from dealings with external parties, such as customers or suppliers, but also from relationships or transactions with managers, subordinates or other colleagues. If a conflict or potential conflict situation arises, you must report it immediately using the form at the end of this document.
- You may not simultaneously work for any concern that does business with or competes with any of the business of the Alfardan Group. You undertake that following your resignation or the termination of your employment (for a period of one (1) year), for whatsoever reasons, or under whatsoever conditions to refrain from engaging in any activities, whether under the terms of an employment agreement or otherwise (this includes the setting up of your own company or one that you have an interest in, that will compete with the interest of Group), identical or similar to those carried out by the Group, particularly if you are aware of trade secrets or other sensitive information.

Although this Code of Conduct may not list every situation that can present a conflict, there are a few instances where conflicts typically arise and the same have been listed below:



**Improper Payments.** You may not offer or accept any improper payment, gratuity or gift to obtain or retain business or secure services anywhere in the world. It is against Group policy to engage in any form of commercial bribery, including the offer or acceptance of any improper payment, gratuity or gift to obtain or retain business or secure services anywhere in the world. No payments or provision of any other benefit shall be made or offered, directly or through an intermediary, to any domestic or foreign government official or official of an international organization for the purpose of influencing any decision or obtaining any improper advantage.

- **Outside Positions.** “Family member” is defined to mean any person who is a relative by blood, marriage or adoption or who has the same residence. You must disclose the following outside positions to the Audit and Compliance Department, who will determine if a conflict exists:
  - A family member works for, and holds a position that can influence decisions at, a firm that directly competes with or does business with the Group.
  - A family member holds a position that interacts with positions of authority at a firm that directly competes with or does business with the Group or any of its affiliated companies.

Further, you may not serve as a director, trustee, officer or similar position (paid or otherwise) of any business, other than with Alfardan Group or any of its affiliated companies without prior written approval of Alfardan Group President & CEO. This rule does not apply to charitable, civic, religious, educational, public, political or social organizations, or to residential boards whose activities do not conflict with the interests of the Group and do not impose excessive demands on your time.

Some examples are provided below to further illustrate this point.

ACCEPTABLE	NOT ACCEPTABLE
<p>Your spouse works in a major competitor's Compensation and Benefits Department.</p> <p>You serve on the board of a residential apartment building.</p>	<p>Your spouse works in a major competitor's strategic planning office (this could be a problem if you are in a position that produces or receives sensitive information.)</p> <p>You serve on the board of an e.g. automobile supplier. (In general, you should not undertake directorships in commercial ventures that compete with any of the Group's lines of business.)</p> <p>Your spouse owns a printing company that has the contract to print the Group's promotional material (this situation creates the appearance of favoring a single supplier). Such appearances could discourage other vendors by making them feel that they cannot effectively compete for the Group's business).</p>

**Your investments:** You may not have financial interests or investments in any organizations or companies (whether public or private) with which Alfardan Group does business, such as suppliers, clients, competitors or Alfardan Group business partners, if that interest or investment could create or give the appearance of a conflict of interest with Alfardan Group. You must consult Audit and/or Legal Department prior to making any such investments or interests which may raise conflict of interest issues. This rule also applies with respect to such investments or interests in above mentioned entities made indirectly (for instance through members of your family).

**Business Opportunities:** You or a member of your immediate family or household should not accept business opportunities, commissions or advantageous financial arrangements from a supplier or business partner of the Group. You may not purchase for personal use the goods

or services of the Group's suppliers on terms other than those available to the general public or established by Group policy.

**Related Party Transactions:** Where a Business Unit enters into an agreement with another Business Unit within the Alfardan Group or with a company with which Alfardan has either a direct or indirect Group relationship payment terms as set out in that agreement must be strictly complied with. If an element of the agreement is in dispute, then, as a minimum, the non-disputed amount must be paid. All such disputes must be reported using the form at the end of this document.

**Government Agencies:** Group entities and its employees shall not, unless mandated under applicable laws, offer or give any company funds or property as donation to any government agency or its representative, directly or through intermediaries, in order to obtain any favorable performance of official duties.

**Regulatory Compliance:** All employees in their business conduct, shall comply with all applicable laws and regulations, in letter and spirit, in all the territories in which they operate & any non-compliance or conflict with legal/regulatory requirements shall be reported using the form at the end of this document.

## 8. HEALTH, SAFE WORK ENVIRONMENT

The wellbeing of our workforce is our first priority, and we will stop at nothing to protect them. Since the Group's founding it has considered ensuring employee health and safety a top priority. To this day, we are steadfast in our commitment to continually improve our safety strategy and offer the greatest possible protection to our employees.

It is the responsibility of Alfardan Group to ensure that employees are provided with a healthy and secure working environment, which considers not only their physical well-being but also their emotional and social well-being. The potential for occupational injuries or diseases is evaluated, followed up on, and mitigating steps are taken by Alfardan. Every worker is accountable for adhering to and demonstrating respect for the Group's internal policies, procedures, and instructions, in addition to the external laws and regulations that are in effect. In this way, they can help ensure that the workplace is a safe and healthy place to do one's job. Any deviations must be immediately reported using the form at the end of this document. Within the scope of their authority, each manager is accountable for seeing to it that this need is met.





Because we at Alfardan Group believe that human life and well-being are of the utmost importance, we make it a point to ensure that every viable precaution is taken when we go about conducting our business in order to ensure that we are in full compliance with the most stringent international health and safety standards. This is done with the end goal of preserving human life in mind.

## 9. REPORTING

You can report a complaint or incident related to any Business Unit of Alfardan Group by filling an online form.

Alfardan Group takes your concerns seriously, however, we expect that this reporting mechanism shall not be misused to make any frivolous or unsubstantiated complaints and/or reports.

To submit a complaint, please click on the relevant Business Unit below:

