



# Code of Conduct



شركة ناقلات النفط الكويتية  
Kuwiat Oil Tanker Company

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# Code of Conduct

This Code of Conduct will be applicable to all Employees of Kuwait Petroleum Corporation (KPC) and its direct and indirect Subsidiaries. This Document aims to provide a set of guidelines to all Employees with regards to their professional behavior in performing their duties at work and in dealings with their Colleagues, Suppliers, Customers, Contractors, Governmental Entities, and the Public.

This Document serves as a reminder to all Employees within the Company of the importance for upholding the highest standards of integrity and personal conduct in all matters related to the Company. Any breaches of these attributes or withholding information about a violation that harms the interest of the Company are subject to accountability and disciplinary action. These disciplinary actions are referenced to in this Code of Conduct as penal and administrative measures the Company takes against the breacher in accordance with locally applicable policies and laws and may reach termination of employment in cases where warranted. In addition, violators may face legal consequences for violating local laws.

Everyone joining the Company and everyone performing work within, including but not limited to Consultants, Contractors, Suppliers, and Sub-Contractors, Employees and Agents must adhere to the Code of Conduct.





## تقدير جميع العاملين Staff Appreciation



تقدير جميع العاملين  
Staff Appreciation

## STAFF APPRECIATION

### 1. Appreciate Staff

The Company policy is based on respecting the rights of others, their beliefs, and religious practices of all religions. Therefore, each Employee is responsible for considering and respecting the rights of others.

We encourage everyone to mutually respect one another regardless of the nationality, faith, or gender, and to engage with openness, trust, and respect, and respond to changes in a work environment characterized by loyalty, cooperation, and one-team spirit, high performance-encouragement, continuous development, and attention to meeting customers' needs.

We affirm the necessity to respect all Employees' rights as any violation in any way constitutes a breach of the Company's policy.

#### 1.1 Respecting Others

We would like to draw your attention to avoid the following actions:

- Violating the rights of other Employees' freedom of belief and religious practices.
- Engaging in racial and sectarian discrimination in any form or by any means.
- Sharing or distributing any material related to sectarian discrimination that provokes hostility or contempt among groups of society be it verbal, written, drawn, or using modern technology, communication means or social media.
- Accusing or insulting other Employees, whether verbal, written or through modern technology, communication means, or social media.
- Deliberate abuse of the Company's reputation in any way be it through modern technology or social media.

■ **Because you matter to us: In case you feel harassed or the Respecting Others provision is being violated, you can always speak to your Direct Supervisor or contact the Company's Compliance Officer.**

#### 1.2 Harassment

The Company seeks to create a healthy, safe, and motivated environment free of all unethical behaviors. Consequently, any form of harassment or hostile behavior towards Employees, Contractors, Suppliers, or Clients will not be tolerated.

We would like to draw your attention to the following strictly prohibited actions:

- Any form of sexual harassment is strictly forbidden including verbal, physical, visual, or any form of harassment using modern technology, media, or social media.



تقدير جميع العاملين  
Staff Appreciation

- Wrongfully accusing others of harassment or making derogatory comments to damage or offend another Employee's reputation, whether verbally or in writing, using modern technology, communication means, and social media.
- We assure prompt and confidential investigation of all complaints. Disciplined ethical conduct is a fundamental element in our dealings and the Company will not hesitate to take strict deterrent disciplinary measures.

■ **Because you matter to us: In case you feel harassed or the Harassment provision is being violated, you can always speak to your Direct Supervisor or refer to the Company's Compliance Officer.**

## 1.3 Individual Rights

### (1) Appropriate Work Environment

The Company seeks to secure a safe, healthy, and supportive working environment where all Employees are treated with fairness and dignity. All Employees must treat their colleagues and subordinates with full respect.

We would like to draw your attention to avoid the following:

- Using inappropriate language, engaging in quarrels, swearing/cursing, as well as direct or indirect slandering, through modern technology, media, or social network platforms.

■ **Because you matter to us: In case you feel harassed or the Individual Rights provision is being violated, you can always speak to your Direct Supervisor or refer to the Company's Compliance Officer.**

### (2) Compensating Employee

The Company shall compensate (Board Chairpersons and members) and (Employees), former or current, in the event of civil or criminal charges arising due to an Employee's performance or due to carrying out instructions received from the Company, or was summoned for investigation at the official authorities or a disciplinary trial for an issue that the aforementioned authorities consider an offense that deserves an investigation without considering the same by the Company because of the performance of his/her work tasks or acting in implementation of the instructions or was assigned to one of the tasks of the Company or K-Companies. The Company shall bear all costs as well as any amounts that have been or are required to be paid before the competent authorities / investigation authorities / prosecution authorities of whatever name / defense authorities to settle any claims / investigations / cases that have been filed, or in implementation of a judgement or an order issued against the Employee at any degree of litigation, in accordance with the following conditions:

- The Employee acted with a good intention in the subject of the lawsuit and believed the actions served the interests of the Company and his behavior was not a result of deliberate negligence or default.



تقدير جميع العاملين  
Staff Appreciation

- In case a criminal or civil lawsuit is filed, or procedures have been commenced involving penalties or financial liabilities, the Employee has considerable justification to believe that the actions in which he/she were engaged were not in violation of the law, or whenever any other measures are taken against him/her, resulting in penalties or financial obligations.
- The Employee reports the matter to the Company immediately after becoming aware of the commencement of legal process.
- The Employee is permitted to make a legal defense.  
The Employee allows the Company to take part in the defense.
- The Employee obtains prior written consent from the Company before reaching a settlement related to the lawsuit or the subject matter.

### (3) Equal Job Opportunities

The Company policy ensures equal job opportunities in line with all applicable laws and regulations related to employing qualified candidates. The Company implements staff regulations, relevant programs, and practices in a form void of discrimination in all aspects of employment relations and conditions including employment, assignment, promotion, redeployment, termination, entitlements, wages, and selection for training programs.

### (4) Fair Treatment (Promotion, Development, Disciplinary Actions)

Employees are the Company's future and greatest asset, hence the Company ensures fairness and justice in the decisions that have a direct bearing on job status, particularly in the following:

**Promotion:** Based on merit and good performance, and the Company implements clear criteria to select candidates and fill vacancies.

**Development:** The Company creates an environment conducive to building the capacity and skills of Employees, in accordance with their job grades, and in line with the regulations and rules set by the Company and Employee training plans.

**Disciplinary Accountability:** Applying disciplinary actions against an Employee, the Company ensures legal guarantees for the Employee, in accordance with the set disciplinary rules that ensure the protection of the Employee's rights by permitting him/her to present a defence with supporting documentation as well as hearing witness accounts (if necessary) during administrative investigations. The Employee has the right to appeal or seek review of a disciplinary penalty in accordance with the rules and regulations set by the Company.

### (5) Participation

The Company encourages Employees to submit proposals and ideas to improve products, services, rules, regulations, and procedures in addition to encouraging the submission of any proposals aimed at reducing costs and maximizing profits.



نظام الصحة والسلامة والبيئة  
والأمن والالتزام به

Commitment to Health, Safety,  
Security and Environment  
(HSSE) System



نظام الصحة والسلامة والبيئة  
والأمن والالتزام به

Commitment to Health, Safety,  
Security and Environment  
(HSSE) System

## COMMITMENT TO HEALTH, SAFETY, SECURITY AND ENVIRONMENT (HSSE) SYSTEM

### 2. Commitment to Health, Safety, Security and Environment (HSSE) System

The Company is committed to preserving the environment and maintaining the safety and health of all Employees, with a dedication to environmental protection while providing a safe and healthy workplace. It seeks to develop innovative concepts, methods, and approaches to address challenges and added value.

The Company seeks to minimize the number of incidents, injuries, and chronic diseases and to preserve the environment when conducting its business, as well as maintaining the safety of Employees at all work sites through commitment to Health, Safety, Security and Environment (HSSE) standards and the safety of operations and operational units.

Employees should comply, follow, and implement HSSE work related standards, measures, and practices placed and documented in HSSE Management Systems. Any violation of HSSE standards within the Company will lead to a strict disciplinary action.

■ **Because you matter to us: If you have reasonable doubts that there is any form of violation of the Commitment to Health, Safety, Security and Environment (HSSE) System provision, or that there are practices threatening the health of workers or the environment, you can always speak to your Direct Supervisor or refer to the Company's Compliance Officer.**



المواطنة  
والمسؤولية الاجتماعية  
Citizenship and  
Social Responsibility



المواطنة  
والمسؤولية الاجتماعية  
Citizenship and  
Social Responsibility

## CITIZENSHIP AND SOCIAL RESPONSIBILITY

### 3 Citizenship and Social Responsibility

The Company aims to make a positive contribution to the community and shares a common concern for the issues of the Company and the Oil companies overall to achieve public interest. It aims to build and maintain long-term partnerships with various entities, ensuring harmony to achieve the goals set by the Company and the State.

#### 3.1 Compliance with Law

The Company is keen to raise legal awareness among Employees to protect the Company's interests. The Company will raise awareness by informing Employees of any new requirements resulting from the issuance of any new laws that have come into effect and will advise them upon venturing into any new business or project. Employees are responsible for notifying the Company about any incidents or circumstances that might involve legal implications for the Company.

We would like to draw your attention to the following:

- The necessity of compliance with all applicable laws and regulations within the Company, and adherence to the laws of other countries when travelling for work-related purposes or attending training courses.

■ **Because you matter to us: If you have reasonable doubts that there is any form of violation of the Compliance with the Law provision, you can always speak to your Direct Supervisor or refer to the Company's Compliance Officer.**

#### 3.2 - Drug Abuse

The Company is committed to provide a safe, healthy, and productive work environment. In return, Employees should maintain self-sound physical and mental health during work to ensure effective performance and avoid endangering the safety of others at work.

We would like to draw your attention to the following strictly prohibited actions:

- Possession, use, or misuse of any non-medical substances that are detrimental to mental health, at workplace, or when commuting to work (such as alcohol, or illegal drugs).
- Employees possessing, using, or abusing medical substances or medicines that are detrimental to mental health except for therapeutical reasons provided the same is issued by governmental bodies, or special approved centers, with notification to the Direct Supervisor and consulting the Company's Clinic Physician.



- The use, possession, transfer, or selling of illegal drugs or other non-therapeutic substances that affect the mental state at any workplace owned or leased by the Company.

The Company emphasizes that involvement in such acts is a violation of safe working practices which makes the transgressor subject to disciplinary action.

**Note:** The Company reserves the right to seek support of relevant authorities to inspect the offices of Employees and their vehicles at work premises. It may also request them to surrender themselves in accordance with law to conduct a medical examination if there is a reasonable cause to believe that the individual appears to be abusing or under the influence of any of the aforementioned substances.

■ **Because you matter to us: If you have reasonable doubts that there is any form of violation of the Drug Abuse provision, you can always speak to your Direct Supervisor or refer to the Company's Compliance Officer.**

### 3.3- Social and Political Relations

The Company encourages Employees to maintain good relations with the community by actively participating in professional associations, licensed charities and social service centers as these institutions can play a vital role for the good and welfare of the community.

The Company does not forbid its Employees to participate and cooperate with local authorities and organizations that work for the good and welfare of the community on a voluntary basis. It also encourages Employees to assume this responsibility and to participate in discussions devoted to solving the problems of society, provided that they do so in their personal capacities and without purporting to speak on behalf of the Company or creating such misimpression.

- We would like to draw your attention that Employees may voluntarily take part in the political process, while avoiding the following actions:

- Using authority to coerce other Employees to donate to, support, or oppose a political group or any political candidate.
- Engaging and participating in political campaign activities during working hours.
- Using authority of position in the Company to support any political activity.
- Using any of the assets owned or leased by the Company in political activities, including computers, printers, copiers, e-mail, and other assets.

■ **Because you matter to us: If you have reasonable doubts that there is any form of violation of the Social and Political Relations provision, you can always speak to your Direct Supervisor or refer to the Company's Compliance Officer.**



## السلوك الاخلاقي ففي العمل

Ethical Business  
Conduct



## ETHICAL BUSINESS CONDUCT

### 4 Ethical Business Conduct

The Company encourages ethical business practices in line with the professional ethics and committing to the highest morals, professionalism, bearing responsibility, and providing high-quality services and products, in addition to creating job satisfaction, and enhancing the sense of loyalty and belonging to the Company.

#### 4.1 Work Ethics

Reputation and client confidence are among the Company's most important assets; therefore, each and every Employee should be committed to conducting business and performing his/her duties in an ethical, disciplined, and orderly manner, and with honesty and integrity. This requires adherence to all relevant business laws, regulations, and ethical practices, including commitment to the official working hours and appropriate business attire consistent with the general taste and norms within the Company. The Company requires its Employees to make sure that their behavior is characterized by the highest standards of integrity and to report any violations of the law and regulations to the Compliance Officer. Employees should comply with all directives issued by the Company or its authorized representatives.

#### 4.2 Conflict of Interest

- All Employees should work diligently in the interest of the Company. As such, every Employee should avoid actions and behaviors that constitute or appear to constitute a conflict with the interests of the Company subject to the pre-disclosure of personal interest.
- All Employees, members of the Company's Board and its Subsidiaries, as well as members of the Higher Tendering Committee, are required to disclose any conflict of interest, that they may have, to the Company's Compliance Officer, in order not to be perceived as disregarding the Code of Conduct and be subject to disciplinary and panel liability in accordance with the regulatory laws.
- Disclosure shall be through a Form of Disclosure of a potential conflict of interest. The Forms shall be submitted to the Compliance Officer who has the competence to review and evaluate the Forms. The Employee shall comply with the instructions of the Compliance Officer in this regard to protect him/her-self from the risk of losing the trust given by the Company.

The following examples represent conditions that may lead to a conflict of interest:

- The Employee or his/her spouse, or any relative of the first or second degree has a significant financial or moral interest with an entity that deals with the Company and is aware of such interest (for example, suppliers, contractors, vendors, customers or licensors) whenever the Employee is aware of this interest in compliance with applicable laws.
- The Employee, or relative among the aforementioned, has a significant financial or moral interest in any of the projects the Company invests in while the Employee, or his/her relative, whenever the Employee is aware of this interest in compliance with applicable laws.



- Acceptance of an invitation for a vacation, cash funds or loan services (except for taking loans from financial institutions) directly or indirectly from a vendor, service supplier, accepting discounts (apart from discounts offered to Company staff in general) or accepting any other benefit that may influence or benefit the Employee or any of their first or second degree.
- Serving as a Board Member, Manager, or Employee for any other entity other than the Company which may have business relations with the Company.
- Directing the course of a business opportunity of the Company towards the Employee's personal benefit.
- The use of the Company's assets (such as stationery, official letterhead which bears the name and logo of the Company, funds, facilities, equipment, tools, or personnel or professional knowledge gained from work) in favor of another employer, or personal interest.
- Participating in Company's internal Committees or external activities that may adversely affect the sound judgment, or performance of an Employee or adversely affect his/her duties.
- The Employee has a first or a second degree relative in the same Directorate. Such a relationship needs to be disclosed to the Compliance Officer and the Direct Supervisor.

■ **Because you matter to us: If you have reasonable doubts that there is any form of violation of the Conflict of Interests provision, you can always speak to your Direct Supervisor or refer to the Company's Compliance Officer.**

### 4.3 Bribery and Corruption

The Company seeks to protect its assets and the integrity of its transactions and avoids all forms of corruption manifested in power abuse for personal interest. Bribery is considered one of the forms of Corruption.

We would like to draw your attention to avoid any of the following:

- Provide, seek, brokering or accept bribes in any form. It is also forbidden to allow any other person representing the Company to do so.
- Accept any gift, cash amount, a bribe or anything of value, whether directly or indirectly, from any person for the purpose of influencing a decision, official assignment or to obtain, retain, assign, or influence business for the benefit of any third party or any other person.
- Exploiting authority and power to acquire any form of personal or financial gains from any party with whom the Company has transactions, be it Contractors, Suppliers and so, and whether this gain is for Employee, or another party, be it directly and indirectly.

■ **Because you matter to us: If you have reasonable doubts that there is any case of Bribery and Corruption, you can always speak to your Direct Supervisor or refer to the Company's Compliance Officer.**



#### 4.4 Gifts and Entertainment

Symbolic gifts that express appreciation with the aim of promoting the Company's business and that bear the logo may be received or granted. Examples of this include calendars, diaries, inexpensive pens, calculators, and plaques.

We would like to draw your attention to the following:

- In the event of receiving a one hundred dinar, or more gift, or equivalent amount in foreign currency (or any lesser monetary value stated in the policy of the Company), the Employee must notify his/her Direct Supervisor and the Compliance Officer in accordance with the relevant reporting instructions.

We would like to emphasize the importance of avoiding the following actions:

- Requesting a gift, service, or any other benefits for oneself or others from the entities that have business relations or desire to have business relations with the Company.

■ **Because you matter to us: If you have inquiries regarding the Acceptance of Gifts, you can always speak to your Direct Supervisor or refer to the Company's Compliance Officer.**

#### 4.5 Working for a Third Party

The Company's Employment Contracts generally prohibit working for others without obtaining a written approval from the relevant authority in the Company. Except for (voluntary work with licensed charitable associations) as long as it does not hinder the performance of the Employee's duties. The Company will implement this provision very strictly and disciplinary actions will be taken against any breach.

We would like to draw your attention that if Company allows an Employee to work for others, it is necessary to do the following:

- A written approval from the Chief Executive Officer (or his/her designee) prior to accepting any outside employment.
- Notifying the Compliance Officer and the Direct Supervisor in writing in the event of a fundamental change in the scope and tasks of work duties with the third party. Not responding thereto within thirty days of notification is considered an approval of this change. In all cases, the Employee must devote working hours only towards performing duties for Company and Employees are prohibited from accepting outside employment without written authorization.
- We would like to draw your attention that the Company has the right to cancel the work preapproval for a third party at any time without giving reasons for cancellation by the same approval issuing competent authority, and the cancellation must be in writing. The Employee must abstain from working for the third party as soon as he/she is notified in writing, or by the date specified in the notification.

■ **Because you matter to us: If you have any inquiries regarding Working for a Third-Party provision, you can always speak to your Direct Supervisor or refer to the Company's Compliance Officer.**



#### 4.6 Prevention of Fraud and Theft

While working, all Employees must respect and comply with criminal laws, the Company regulations and Code of Conduct. Employees must refrain from committing any legally criminal act such as forgery / fraud / theft / embezzlement / seizure. Committing any of these acts is considered an explicit violation of the Code of Conduct, which includes, but not limited to, the following:

- Forging or falsifying contract documents, such as invoices.
- Misappropriation of funds.
- Falsification of qualifications and experience certificates.
- Employees should not deliberately misuse information to the detriment of the interests of the Company and not use unauthorized exploitation of the workforce of any of the contractors or their vehicles or equipment or misuse of approved funding, including petty cash and vouchers.

■ **Because you matter to us: You should seek guidance from the Direct Supervisor or the Compliance Officer prior to taking any action that may be perceived as Forgery or Theft and inform the Compliance Officer about any violation mentioned hereinabove and others.**



## سرية المعلومات Confidentiality



سرية المعلومات  
Confidentiality

## CONFIDENTIALITY

### 5 Confidentiality

The Company encourages maintaining the confidentiality of work and work-related information, as well as Company's data, ensuring trust, respect, transparency, and collaboration with the external entities.

Additionally, we recognize the importance of controlling the disclosure of data, information, and knowledge flow within the organization as well as the importance of protecting intellectual rights of the Company.

#### 5.1 Information and Knowledge Management

We would like to draw your attention to avoid the following actions:

- Intentional misuse of the Company's information for personal gain or for the benefit of any of the Company's competitors is considered a serious violation of the contract between the Employee and the Company.

We would like to also emphasize the importance of the following:

- Obtain the authorization of the Chief Executive Officer (Company) or his/her delegate prior to sharing information outside the Company.

■ **Because you matter to us: If you have reasonable doubts or inquiries concerning the possibility of Sharing Information with non-Employees, or you find a breach to the access of information, you can always speak to your Direct Supervisor or refer to the Company's Compliance Officer.**

#### 5.2 Requests for Employee Information

We would like to draw your attention to the importance of the following:

- Any request for the disclosure of information about an Employee in the Company must be referred first to the relevant personnel Department and the Legal Department, whether the information requested is personal, medical status-related, or other, in line with the applicable laws and regulations.

We would also want to emphasize avoiding the following actions:

- Accessing or disclosing information regarding current or former Employees without prior authorization or permission from the relevant Department, in accordance with the applicable laws and regulations.

■ **Because you matter to us: If you have reasonable doubts or inquiries concerning Request for Employee Information and disclosing, you can always speak to your Direct Supervisor or refer to the Company's Compliance Officer.**





### 5.3 Representation of the Company or Speaking on its Behalf

The Company ensures that all Public Relations activities and communication with the Media and Senior Government Officials to be conducted through the concerned Deputy Managing Director/Deputy Chief Executive Officer (or his/her designer)

We would like to draw your attention to the following:

- Distinguishing between personal statements made on his/her behalf and official statements made on behalf of the Company.
- In the event an Employee receives inquiries from Media representatives related to the Company's activities, while not having the authorization to issue statements, the Employee shall refrain from expressing any comment in this regard and shall advise the Media representative to seek the relevant authority within the Company.
- Every Press Release regarding the Company should be issued by the Corporate Communication and media Department.

We would like to draw your attention to avoid the following:

- Publishing or re-publishing any visual, audible, films or information related to the activities of the Company which relate to incidents that occur at workplaces through social media, modern means of communication or any other means without obtaining a written authorization or a permission to do so from the concerned authorities in the Company. It is imperative to adhere to the Company's rules and policies in this regard.

■ **Because you matter to us: If you have doubts or inquiries pertaining to Information on activities or business of the Company, or in the event of publishing unauthorized information on Social Media platforms, you can always speak to your Direct Supervisor or refer to the Company's Compliance Officer.**

### 5.4 Information Technology - Privacy and Security and Copyright

The Company uses modern systems in conducting its business. Since the Company allows authorized Employees and Contractors to use these systems, it expects them to optimally use it and take responsibility for its use. Employees must refrain from any prohibited actions, including, for example, the following:

- Access or attempt to access data or computer files of other user's computers.
- Violation of prohibited regulations pertaining to the use of computers.
- Tampering with any of the computer hardware or software components.
- Illegal copying of documents protected by copyright and intellectual rights or publication of the Company's documents.



سرية المعلومات  
Confidentiality

- Disclosure of confidential data or sharing confidential information with unauthorized Employees, whether working within the Company or externally, especially if such disclosure was through social media platforms.
- Attempting to acquire or hack computer information.
- Unauthorized use or disclosure of username or passwords.
- The use of information technology to disclose confidential information that affects the interests of the Company.
- Leaking of documents or information that affect the tender process, or other interests of the Company.
- Leaking or publishing any form of documents, data, or information belonging to the Company on Social Media platforms, or via modern technology or using it by any other mean.

Employees, as well as former Employees are prohibited from publishing agreements or documents related to the Company on Social Media platforms, or via modern technology or by any other means.

**Note:** The Company reserves the right to monitor the use of computers by Employees, including work-related e-mail.

■ **Because you matter to us: If you have reasonable doubts relating to any form of violation to any clause in the Information Technology provision, or you suspect a threat of breach of Privacy, Security and Copyrights, you can always speak to your Direct Supervisor or refer to the Company's Compliance Officer.**

### 5.5 Information Confidentiality

Many Employees have been entrusted with duties of a sensitive nature which reflects the Company's confidence in them. Employees in those positions and performing these duties must categorically exercise a high degree of ethical responsibility since they are privy to the Company's accounts, data related to Employee's wages, personal records, invoices, data



سرية المعلومات  
Confidentiality

pertaining to the partners of the Company, contracts with suppliers and service providers. Some Employees are also privy to operational data, license contracts, data stored on computers and other sensitive, confidential, or personal data. Employees, current or former, are reminded of their contractual commitment to safeguarding confidentiality.

We would like to remind you to avoid the following:

- Disclosing any confidential information of a sensitive nature to unauthorized persons, altering, or making an attempt to alter any of the Company's records, since such actions constitutes a breach of trust which would entail disciplinary action, including dismissal.
- Using modern technology and other means to record meetings and conversations without authorization or permission.

Employees, Current and former, may not disclose any information without the prior written consent of the Company, and this obligation shall remain in effect as long as the information is considered confidential.

■ **Because you matter to us: If you have doubts or concerns regarding Confidential Information, or what constitutes a breach of trust, you need to refer to the Company's Compliance Officer.**



## التبليغ Reporting



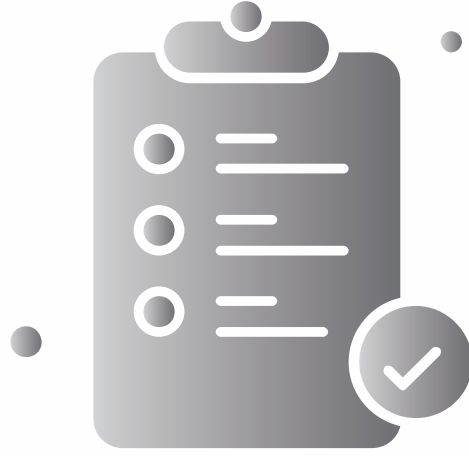
# REPORTING

## 6- Reporting

To maintain a healthy and safe workplace, the Company encourages reporting any violation of the Code of Conduct. It also encourages professional and honest conduct in line with Corporate Values. It is upon the Employees to contribute to reporting any prohibited activities that constitute violation of the laws, rules, and regulations.

We would like to draw your attention to the following actions:

- Employees should report any form of violation of the Code of Conduct, or any violation of the Company's rules, procedures, and regulations, to the Compliance Officer in person, or in writing, by e-mail, or through any other means.
  - An Employee should provide material evidence that justifies and supports his/her claim that the reported incident is genuine.
  - The Company ensures that all serious reports are reviewed and audited, the validity of the information and facts mentioned therein are verified, even if their source is anonymous or through any party or external parties.
  - The Company ensures that all reported violations, and the identity of the informant shall be handled in strict confidence, in accordance with the applicable laws.
- **Because you matter to us: If you have doubts or material evidence of any violation stipulated in the Code of Conduct or any of the Company rules and regulations, you need to refer to the Company's Compliance Officer to report it.**



# إرشادات عامة

## General Instructions

## GENERAL GUIDELINES

### • What is Meant by Respecting the Law When Traveling on Business Assignments or Training Sessions?

In accordance with clause (3.1), compliance with law of the provision (3) Citizenship and Social Responsibility, “Employees should comply with all laws and regulations applicable in the Company and comply with all the laws of other countries during business trips or training courses”.

During business related trips such as scholarships, external training courses, business trips and assignments to the Company’s foreign offices, each Employee should comply with all laws, rules, and regulations of the Company during the official working hours as well as complying with the Code of Conduct regardless of the laws applicable in the country, where they are assigned. All employees shall be the best ambassadors by complying with all laws and regulations of such countries.

### • What is a Conflict of Interest?

The legal or factual status in which a person is in a position where he/she is perceived to be accepting or receiving a direct or indirect benefit from any third party that has dealings or commercial interests with the Company (Contractors, Suppliers, and others), whether for himself/herself or others or direct and indirect family relation as per examples in clause (4.2) Conflict of interests, or if the benefit affects the Employee’s ability to function and perform his/her duty objectively and impartially, provided the Employee is aware of the interest mentioned above.

### • What is Disclosure?

In the event of a conflict of interest of any Employee who possesses decision-making authority, or who is in a position to influence the making of a decision at any stage, the Employee must disclose any conflict of interest by completing the attached Disclosure Form and submitting it to the Compliance Officer.

### • What are the Steps that the Employee Should Follow in the Event of a Potential Conflict of Interest to Avoid Being Subject to Disciplinary Action?

1. During the performance of any duty, the Employee should be aware of any actual or potential conflicts of interest that may arise.
2. Disclose the existence of any kind of conflict as soon as he/she becomes aware of it.
3. Abstain from participation in any decision that may constitute a conflict of interest.
4. Comply with any final decision on non-participation in decision-making or reclude himself/herself from any personal benefit and comply with any other applicable procedures of Company or in accordance with the related laws and regulations to avoid conflicts of interest.



إرشادات عامة

General Instructions

### **What are the Steps to be Taken by an Employee to Protect Himself/Herself Against Being Subject to Disciplinary Action if an Employee is Offered Any Benefit Directly or Indirectly Which is Against the Code of Conduct?**

- Reject the gift or benefit.
- Identify the person who made the offer.
- Seek witnesses, if possible.
- Report the incident to the Compliance Officer as soon as possible.

### **What is Reporting?**

Reporting is the process followed in reporting any violation of the Code of Conduct that takes place within the Company.

### **Who is the Informant?**

Informant can be any Employee responsible for reporting the occurrence of any violation of the Code of Conduct and non-Employees who work or perform an assignment for the Company. This also includes, but not limited to, Consultants, Contractors, Suppliers, Vendors, Contractors' Subcontractors, Agents and any Employee or Agent of an external party who knew or knows of the occurrence of actions, behaviors or practices that are in violation of the Code of Conduct, the law, or the regulations and procedures of the Company.

### **What are the Reporting Procedures?**

Informing the Compliance Officer of the occurrence of, or the possibility of, a violation of the Code of Conduct either in person, in writing, by telephone or via direct email of the Compliance Officer, or by any other means of communication.

Any Employee at any level, or any external party, may inform the Compliance Officer of the occurrence or the possibility of the occurrence of a violation of the Code of Conduct either in person, in writing, by telephone or via the direct email of the Compliance Officer, or by any other means of communication.

### **Is There any Protection for the Informant?**

- All reports shall be treated with the strictest confidentiality to protect the informant.
- Any Employee can report any violations of the Code of Conduct without fear of harassment, negative impact on job grade, or being subject to disciplinary action or any other arbitrary action against him/her.



- If the informant acts in good faith when reporting what is believed to constitute a violation of the Code of Conduct, based on reasonable grounds, the Company shall ensure that he/she is not subject to any detrimental action as a consequence of reporting, even if the Employee does not provide evidence of the reported matter.

### **Are Reported Violations Investigated?**

All reports are subject to review, investigation, and verification of the accuracy of the information and the facts mentioned therein by the Compliance Officer of the Company. The Compliance Officer shall raise the matter to higher authorities at the Company in order to obtain the necessary approvals and procedures.

### **What is the Proper Dress Code?**

An appropriate dress code must be professional, decent and in accordance with public norms within the Company.

Avoid any breach of the HSSE requirements with regards to work gear of Employees working in the Company's operational sites during official working hours and avoid wearing the uniform in public places.

Examples of Inappropriate Clothing for Female Employees:

- Transparent Fabrics.
- Tight-fitting Clothes.
- Sports Apparel.
- T-shirts.
- Short clothes that contradict the international standards of the office dress code.
- Shirts bearing inappropriate drawings or phrases.
- Sleeveless dresses/shirts.

Examples of Inappropriate Clothing for Male Employees:

- Short Trousers.
- T-shirts.
- Shirts that carry inappropriate drawings or phrases.
- Sport wear.
- Traditional clothes (Dishdasha) without the Ghutra and Egal.
- Hats that carry inappropriate drawings or phrases.







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