

# Code of Conduct Policy

## 1- Definitions

The following terms and expressions shall have the meaning they bear as follows unless the contrary intention appears:

**The Kingdom:** The Kingdom of Saudi Arabia

**"The Company" or "al arabia":** Arabian Contracting Services Co.

**Laws and Regulations:** The Laws and Implementing Regulations in Saudi Arabia.

**Capital Market Law:** Capital Market Law issued by the Royal decree number M/30 on 2/6/1424H corresponding to 31/7/2003, and its amendments.

**Anti-Bribery Law:** Anti-Bribery Law issued by the Royal decree number M/36 on 29/12/1412H corresponding to 30/6/1991, and its amendments.

**The employees of the company:** the employees of the Arabian Contracting Services Co., whether with permanent or temporary employment contracts.

**"Employee" or "Worker":** Any person associated with the Arabian Contracting Services Co. in a contractual work relationship.

**Stakeholders:** Individuals or groups of individuals that have a direct or indirect stake in an organization who can affect or be affected by the organization's actions, objectives, and policies. Key stakeholders in an organization include "shareholders, Executive Management, employees, clients, creditors, banks, suppliers, local community and government".

**Concerned Persons:** All stakeholders to whom the provisions of this policy apply, according to the context of the text.

**Natural resources:** Materials from the Earth that are used to support life and meet people's needs.

**The Company's official website:**

[al-arabia.com/investor-relations](http://al-arabia.com/investor-relations)

## 2- Objective

Whereas, the Arabian Contracting Services Co., based on its belief in the importance of maintaining the highest standards of integrity and responsibility in the practice of its business, to ensure both, sound practices and compliance with laws, regulations, contractual obligations, work ethics, policies, pioneering practices, and any other requirements for all stakeholders, in addition to achieving flexibility, innovation and building trust in the work environment and create a professional culture that suits the company's status and the importance of its role in society and the economy, and taking into account the laws and regulations applied in the Kingdom, this policy has been prepared to set the rules for professional behavior, ethical values and work culture in the Arabian Contracting Services Co.

### 3- Professional behavior, ethical values, and work culture

The company is committed to provide a healthy and safe work environment consistent with the laws and regulations in the Kingdom, in addition to performing the functional and contractual rights towards its employees, clients, and suppliers in accordance with the contracts concluded. Alarabia looks forward to the concerned persons assessing and judging matters professionally and independently to present all possible efforts to prevent wrong practices that may occur in the performance of their duties and responsibilities.

To accomplish this, the concerned persons should consider the following:

#### 3-1 Respect

Everyone deserves respect and decent treatment, regardless of any other considerations. Therefore, the concerned persons must follow the general protocol in dealing with each other and not belittle, disparage, insult, or harass others with any behavior, actions, or words, the concerned persons must observe the following:

- Refrain from any actions that violate public morals and correct behavior, or any actions or practices that are contrary to public morals, including insulting the religious beliefs of others inside or outside the workplace, or incitement against them.
- Respecting each other, as associates in work and cooperating in accomplishing the work based on capability and exchanging experiences.
- Communication amongst employees must be without discrimination, preference, contempt or disdain. Also must respect traditions, as required by the nature of the work.
- Immoral acts are forbidden, which is considered as abuse (all negative practices and all forms of exploitation, blackmail, inducement, or threat, whether physical, psychological, or otherwise) by any means, whether by action, words, or sign.
- Kindness and honesty, rejecting bickering, hatred, envy, backbiting and gossip, trying to cause mischief between workers, and not engaging in controversy over sensitive or contentious topics.
- Avoiding rumors, and slander, and avoid publishing negative messages and everything that may harm the reputation of the worker and the reputation of the company.
- Not to take any action that would incite any of the employees or clients against the interest of the company or provoke the employees, and work to solve the problems in a sound way and follow the policies of the company concerned with that.

#### 3-2 Observe Privacy

Alarabia respects the privacy of its clients and all other stakeholders, and sets policies that regulate access to personal data, and make sure that this data is available only to authorized persons from within the company, and the official authorities responsible for that, and the company is committed to the following:

- Protecting personal data of employees and other stakeholders.
- To refrain from acquiring or utilizing personal data unless it is for legitimate purposes and essential business requirements.
- Comply with the privacy and data protection policy, and all relevant privacy policies and procedures.

### 3-3 Human Rights

The company honours and respects all employees, as everyone works with their full free will without coercion to work. In addition to supporting all human rights established in accordance with the laws and regulations in force in the Kingdom of Saudi Arabia.

### 3-4 Public Appearance

The employees shall pay attention to general hygiene and respect the formal dress code when required according to the instructions issued by the company.

### 3-5 Confidentiality

The concerned persons shall maintain the confidentiality of all the technical, commercial, and industrial information of the services they provide or which they participate in providing directly or indirectly, which are related to the company.

### 3-6 Company's Assets and Resources

Concerned persons must protect the assets and resources of the company and ensure their efficient use, and since theft, negligence and waste of these assets has a direct impact on the performance and sustainability of the company, therefore the assets and resources of the company may only be used for the purpose for which they were set, and for the objectives and business of the company and its subsidiaries, and by authorized person to do so or on their behalf, including tangible and intangible assets.

The concerned person must exercise due diligence in preserving the assets and resources of the company, for example:

- Optimal use of the company's assets and resources to achieve its objectives.
- Adhering to safety regulations within the company and not neglecting or exposing property to the risk of fire or damage.
- Ensure the protection of computer devices and systems and prevent unauthorized use.
- It is strictly prohibited to utilize the company's name, identity, and trademarks for personal purposes.
- The utilization of equipment and office tools is restricted solely to company-related business activities. Exploiting official working hours to carry out the company's business.
- Protect the company's assets and resources from theft or vandalism, and follow the procedures followed in accordance with the whistleblowing policy practices when such cases occur.

## 4- Employees Responsibility

The company's employees are committed to the following:

**Care and loyalty** exerting the necessary and reasonable care towards the company, developing it, and maximizing its value.

**Company value** preserving the company's reputation and highlighting its value and identity.

**Personal interests** employees are prohibited from utilizing their job position in an exploitative manner with the intention of pursuing personal interests, whether for themselves or others.

**Responsibility** Employees are expected to carry out their job duties and tasks responsibly and efficiently, adhering to best practices and completing them within the designated time frame during working hours. It is important to perform these tasks fairly and objectively, prioritizing the accurate and professional service of the company's interests. Employees are also required to comply with all relevant rules, regulations, policies, and work procedures.

**Commitment** employees must allocate official and designated working hours solely for the purpose of carrying out their work duties and tasks. Engaging in activities unrelated to work duties is not permitted, unless explicit written authorization has been granted.

**Confidentiality** Employees are required to maintain the confidentiality of technical, commercial, and industrial secrets pertaining to the services they provide, whether directly or indirectly. This includes safeguarding all professional secrets associated with their work and the company.

**The company's assets and resources** employees are expected to exercise proper care and maintenance of company-owned machines, devices, tools, and other resources that are entrusted to them. It is their responsibility to ensure these assets are used appropriately and returned to the company in good condition. Additionally, any unconsumed materials should be returned to the company as required.

**Private Information** restricting access to private information to authorized persons and refraining from exploiting any information related to workers' private lives with the intent of harming them in any way.

**Inside information** insiders are expected to adhere to the designated timing and powers granted to them in a manner that aligns with applicable laws and regulations. Their actions should not contradict or violate any legal requirements.

**Social Media** employees are advised to refrain from using social media platforms to discuss matters related to their daily work tasks, workflow, or any form of abuse towards the company or its employees. Instead, any suggestions or observations should be submitted through the designated communication channels available within the company in a professional manner. This helps maintain a respectful and appropriate work environment.

**Whistleblowing** reporting through the available channels within the company about cases that violate the company's policies and regulations.

**Gifts** all concerned are strictly prohibited from accepting, giving, or offering any valuable gifts, whether financial or in the form of services, from external parties with whom the company has dealings. Accepting such gifts could potentially influence decision-making and harm the interests of the company. Furthermore, gifts from suppliers or clients should not be accepted, given, or offered unless they are simple and non-valuable. This policy aims to maintain integrity and avoid conflicts of interest.

**Insider Trading** occurs when an insider such as a board member, top executive, employees of the External Auditor, any member of the company's committees, or any person who obtains inside information through a family relationship including a person related to the person who obtains the information, or through a business or contractual relationship trades directly or indirectly based on that Inside Information. Also, it includes a person who is not an insider, but trades directly or indirectly based on Inside Information obtained from another person, when knows or should have known that this kind of information is Inside Information.

Insider Trading is one of the illegal practices to Article 50 of the Capital Market Law, and it is a criminal offense according to the laws and regulations, and all employees of the company are prohibited from Insider Trading before disclosing to the public, considering the transactions restrictions periods of members of the board of directors and executive management.

## 5- Company's Responsibility

The company acknowledges the significance of establishing an appropriate work environment for its employees, as it directly influences the company's performance and long-term viability. Consequently, the company is dedicated to upholding the following commitments:

- Respect individuals, their value and culture, whether they are clients, employees or suppliers, and all stakeholders without limitation.
- Follow the approved standards for sustaining the environment, natural resources, health, and safety.
- The company is committed to evaluating employees based on merit, fostering competitiveness, and providing equal opportunities. It aims to support employees in developing their abilities, assisting and motivating them to enhance their performance in all aspects related to their career progression.
- The company strives to create an environment that offers suitable opportunities for training and continuously enhances the career paths of its employees.
- The company endeavors to foster an environment that encourages open discussion and dialogue, while respecting the freedom of opinion and expression.
- The company promotes an environment that encourages initiative and innovation, providing opportunities for employees to actively participate in suggesting improvements for services and work development.

## 6- Commitment to Safety and protecting the Environment

The company prioritizes the provision of a safe work environment and is dedicated to enhancing safety standards within the communities where it operates. It also strives to preserve natural resources and minimize the environmental impact resulting from its business operations.

With regards to this objective, the company and its employees are enthusiastic about pursuing the following endeavors:

Follow all safety and environmental standards

Conservation of natural resources, and the rational use of energy to preserve them

Cease engagement in tasks or discourage others from engaging in tasks if they pose a direct threat to safety

Promptly inform the line manager or designated individuals responsible for health, safety, and environmental matters at the workplace of any actual or potential situations pertaining to health, safety, or the environment

## 7- Anti Bribery and Corruption

The offense of bribery occurs when an individual offers, induces, provides, receives, or accepts anything of value in return for performing specific duties. As per the anti-bribery legislation, all employees of the aforementioned companies are regarded as public officials and are liable to face the penalties prescribed by the anti-bribery law.

The company is dedicated to adhering to the anti-bribery and corruption laws and regulations in the Kingdom. The company strictly prohibits the acceptance or payment of bribes or illegal commissions. There is zero tolerance for any form of bribery or corruption within the company, and no exceptions are made in this regard.

## 8- Shareholders Rights

The company is dedicated to upholding the rights of its shareholders, with the Board of Directors ensuring fairness and equality among them, as well as the full exercise of all rights associated with their shares. The company places particular emphasis on the following principles:

**Honesty** the company is firmly committed to upholding the principles of honesty, trustworthiness, and integrity. It also emphasizes the duty of care and loyalty towards the company, prioritizing actions that preserve its interests, contribute to its development, and maximize its value. Furthermore, the company places the interests of the company above personal interests or the interests of any other party.

**The interest of the company** the company, as a representative of all its shareholders, is dedicated to pursuing actions that serve the best interests of both the company and its shareholders. Furthermore, the company is committed to respecting the rights of all stakeholders involved in its operations.

**The company's assets** limiting the use of the company's assets and resources to achieve the company's purposes and objectives, and not exploiting those assets or resources to achieve personal interests.

**Transparency** The company is keen to apply the principle of transparency and merit in applying all its approved policies and procedures, in accordance with the company's value and principles.

## 9- Code of Conduct Violations

### 9-1 Whistleblowing

The company encourages its employees to report violations or potential violations of the rules of the Code of Conduct, so that the company can take appropriate action and rectify the situation. Reporting violations shall be through one of the following reporting channels:

- Direct manager.
- Human Resource Department.
- Internal Audit Department.
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### 9-2 Penalties

Should any of the regulations outlined in the Code of Conduct or approved company policies be breached, appropriate disciplinary measures may be implemented, taking into account the nature and circumstances of the violation. These measures can include the suspension of benefits and incentives, or even termination of the contractual relationship, particularly if the violation contravenes public order.



### **9-3 Protecting the Whistleblower**

The company is dedicated to ensuring that employees have the right to engage in whistleblowing or appeal any decisions made through the established channels within the company. Additionally, the company is committed to safeguarding whistleblowers from any potential harm that may arise as a result of reporting violations, in accordance with the approved policies.

### **10- Publication, enforcement, and amendments**

This policy will become effective and obligatory for the company upon its approval by the Board of Directors. It will be published on the official website of the company to ensure accessibility for shareholders, the public, and stakeholders including employees and others. The policy will be subject to periodic review as recommended by the Board of Directors. Any proposed amendments will be presented to the Board of Directors, who will thoroughly examine and approve them.

