

BUSINESS CODE OF CONDUCT

Introduction

The Company's culture and values are reflections of the management's commitment to a sustainable business and corporate governance. Despite being diverse in its business portfolio, the transparent characteristic of the organization has opened several potentials of development whilst being adaptive to the cultures of its business partners. Considering the aggressive market dynamics globally, Al Naghi Company nevertheless emerges as an organization with well-founded attributes of the reputation such as; equality and inclusivity, custodian of human rights, environmentally nurturing, pacifist, business fairness, and transparency, among others. The evolving concept of sustainability in business became one of the organization's strategic approaches in catalyzing a holistic business model. The company's active engagement in either regulatory or legislative requirements are manifested through continual commitments such as;

1. commitment to take care of its men and women whose efforts are unprecedented by providing the people with assured security, equal opportunity, fair compensation and benefits, dignified working conditions, and a clean and risk-free environment. The business philosophy of the company is to provide its employee with competent pro-people management, opportunities for career development, and an atmosphere to speak up without any fear of retaliation. Moreover, it shall not deny any help it could give to its people in sustaining their responsibilities as individuals or to their families.
2. commitment to take care of the environment and the community from where it has established its presence by reminding its employees to respect the citizens in the community, understand the culture and practices of the business, and compliance with the country's legal duties and responsibilities including fair taxation. Al Naghi Company shall continually participate in activities protecting the environment and natural resources despite the passion for progress and development.
3. commitment to protect the interest of the company and the stakeholders it has sought business dealings with by protecting our stakeholders trading secrets and other business' information, innovation in business platforms as a necessity, and delivering the quality promise to its stakeholders starting from the receipt of goods and up to distribution, i.e. to ensure that the storage facilities are equipped with standard machinery and tools, enough room for storage and most importantly is following approved procedures enforcing works within an acceptable limit to zero deviations in quality.
4. commitment to continual improvement and development of the organization's policies and procedures through audit compliances but not limited to; internal audit, external audit, client-initiated audits, and/or certification audit, e.g. ISO, SAI, UKAS, etc.

This Business Code of Conduct, however, may not cover all occurrences but shall serve the purpose of presenting the organization's business platform as reference or as a gauge to all applicable measurement there is to verify in terms of performance and/or regulatory compliance, and is, therefore, may change at any time as the business requires.

The responsibilities termed for "employees" refer to all active employees of Al Naghi Company regardless of position and tenure. This Business Code of Conduct shall remind all employees of Al Naghi Company of their significance and participation in the establishment of the organization's commitment and reputational investment and are highly encouraged to act;

1. transparent and legally conscious;
2. consensus to the company's policies and procedures;
3. in priority of the company's interest rather than the individual.

1. Our Purpose and Core Values

AL NAGHI COMPANY was founded in 1911 to answer the needs of distribution in the Kingdom of Saudi Arabia. Since then, its unprecedented effort left a footprint in the market and has provided the company an overwhelming opportunity of expanding its business horizon throughout the kingdom. It has partnered with multinational companies and continued to attract potential business allies having the same culture and values as the organization. The corporate shared value of AL NAGHI COMPANY has enforced policies that are necessary and critical to the business requirements. This strategic approach is adaptive to changes in the aggressive market dynamics and has given the company a reputation as one of the leading pharmaceutical and Fast Moving Consumer Goods (FMCG) distributors in the kingdom of Saudi Arabia. The company's progress matches the market demands and is continuously innovating business tools at par with the industry's requirements. Moreover, AL NAGHI COMPANY understands the significance of its people in the business process. The effort from each of the employees in the company cannot be argued, but rather is accounted for in every equation there is in the pursuit of progress and development.

2. Our Core Values

We are a company of strong moral principles.

We empower people to morally perform and deliver exceptional service.

We are transparent and adaptive to market dynamics.

We are an equal opportunity company.

Our core values are part of every business strategy we enforced and they have become our reference whenever we respond to the needs of the business, uncompromising our commitment to ethical practice and therefore providing the Company a seamless interaction with its people and the community.

Message from the President

*Foremost to us is our **Reputation** and **Trust** which we deeply consider as non-breakable boundaries.*

We take full responsibility in preserving ours and the shared business ethics and values of our stakeholders and in every community that we live-in.

*In **Al Naghi Company**, our people, our customers and our business partners are our **FIRSTs**. Hence, we continue enhancing and innovating our systems and our ways in conducting our business, making us capable in addressing the ever-changing business world, thereby enabling us to serve with no less than a mark of excellence.*

*Our company's legacy that has been rooted upon from generations to generations will remain as we bestow to the coming generation nothing but a highly responsible organization. We will continue to be bounded by our company's business ethics and code of conduct; and, as vanguards of our **Reputation** and **Trust**.*

Mohammed Ahmed Naghi

3. Regulatory Compliance and Legal Legislations

"We encourage our employees to act transparently and legally conscious"

One of the objectives of Al Naghi Company is to make sure that all employees shall have the access to regulatory and compliance information. It is imperative to the business that while we understand the commitments (binding and non-binding) we have with our business partners, it is also the organization's responsibility to enforce adequately the needed regulatory and compliance tools for our employees. For the organization to achieve the set objective, the working management systems (QMS, HSE, and CSR) of the organization have developed a measurable compliance framework through policies and procedures necessary to qualify a recommendation and control.

3.1 Corporate Ethical Practice

In raising a complaint, our employees must understand the definition between personal issues and ethical breaches. As much as we practiced zero-tolerance on Retaliation, we do not welcome the misunderstood idea of ethical versus unethical manner as it may be abused resulting in conflict. Hence, a successful information campaign of the company's Business Ethics and Code of Conduct is necessary.

We seriously and discreetly resolve ethics complaints regardless of the gravity of the submitted complaint. We adhere to the principle of confidentiality to the fullest possible extent we could, to address each of the involved party's justifications.

3.1.1 Test Kit in Pre-Validating your Complaint

- *Is it personal or legal?*
 - *Do we have policies to back the complaint?*
 - *Does it affect our values and culture?*
 - *Does it protect the interest of our client's/business partners?*
 - *Will it present a negative impact on the business and the community?*
 - *Is it hurting the business philosophy of the company?*

3.1.2 Business Integrity

Integrity (business and individual alike) is a priceless value an organization must-have, so that in every decision that we do, our ethical standard remains high, serving the interest of our people, the community, and the stakeholders in particular. AL NAGHI COMPANY believes that Integrity plays an integral part in business performance and success. While it cannot be argued the possibility of ethical failures and breaches, the headline will continuously remind the organization of how important communication of the code is, throughout the business model of Al Naghi Company. Why is it important for a business to have a clear ethical standard? A murky code statement could result in confusion, disappointment, disgust, and dysfunction, both inside and outside of the organization. On the other hand, the [reliability and trustworthiness that a business demonstrates in every single interaction and transaction, are reflections of business integrity.](#)

We encouraged our employees to speak up whenever they feel that our Business Ethics and Code of Conduct are violated. You may reach out through our Corporate Social Responsibility Governance & Compliance Officer for clarifications or complaint assistance.

4. Conflict of Interest

"We encourage our employees to act in priority of the company's interest rather than the individual".

For purposes of definition, an "interest" is a commitment, responsibility, or an associated goal in an organization or practice. We define further "Conflict of Interest" when an employee has a personal or professional interest that competes with the best interest of the Company. The organization maintains its standard of business integrity and avoids the slightest representation of conflict of interest in all of its business participation through its commitment to remain impartial and objective with every decision it makes. We remain steadfast with our commitment to maintaining the confidence we have mutually invested in our business affiliates and the community.

In a situation where Conflict of Interest is manifested or an indirect situation leading to a Conflict of Interest, the employee shall disclose it to his/her direct manager, compliance team, or HR for transparency and appropriate resolution. This Business Ethics and Code of Conduct will present some of the most common situations where Conflict of Interest is manifested.

4.1 Identifying "Conflict of Interest"

Controls are in place in the organization's platform to minimize a potential hazard in business. A few of the controls we introduced to de-escalate "Conflict of Interest" are as follows;

1. Enforced Anti-Bribery and Anti-Corruption (ABAC) Policy.
2. No political affiliation.
3. Clause on the importance of confidentiality of information.
4. Automation of processes for traceability and transparency.
5. Prohibits gifts and grants, and;
6. Background check and "conflict of interest" disclosure.

4.2 Conflict of Interest Disclosure

The organization's first course of action is to prevent any representation and/or manifestations of "Conflict of Interest". Our employee induction procedure includes the identifiable characteristics of a situation with a "conflict of interest". It is our responsibility to remind our people of the practiced corporate shared value of the company, particularly to conflict of interest, bribery, and corruption, among others through scheduled training and awareness or other initiatives which disclose these business parameters.

4.3 Conflict of Interest and Nepotism

For purposes of definition, nepotism is an act favoring a family member to secure a role in an organization using the advantage regardless of the skill requirement necessary to assume the vacancy. An organization may waive the criteria for nepotism provided that it has the necessary control to circumspect the skill set of the family member or relative aspiring for the post. A family member or a relative aspiring for the post shall undergo the same employment procedure as the others to fill the posted role. Al Naghi Company shall proceed per hiring procedure matching the skill set of the candidate before the extension of a contract. As a control, a declaration as part of a conflict of interest shall take part in the recruitment process.

4.4 Personal Relationships

While we may hire immediate family members or partners of our people, we take the decision seriously as it may constitute a Conflict of Interest that will undermine our relationships with our stakeholders. An example would be sharing confidential information between you and your family member from different suppliers or comparing financial transactions from different sources both you and your family members are significantly involved.

Constantly remind yourself of the value of Integrity. Remember to re-assess every decisions and action you are about to make if it has implications towards our culture and if it doesn't undermine our Reputation and Trust.

4.5 External Activities

Outside of the Company's activities must not compromise our interest unless they are allowed by law/s. We do not recommend activities outside if they will intervene to our people's responsibilities for AL NAGHI COMPANY, poses risk to the company's reputation, or could introduce Conflict of Interest. Moreover, any affiliations to certain organizations which follow the same interest and line of business with AL NAGHI COMPANY may constitute a Conflict of Interest.

We encourage interaction for authorization and permissibility with HR or the Compliance Team to review legal implications, Conflict of Interest, and risks of the outside activity. In instances where the activity is endorsed by AL NAGHI COMPANY, participating employees may opt to pursue the activity outside at the expense of the employees' cost and own risks and within the allowed spare time only. Take a moment to read and get familiar with the instances that may manifest Conflict of Interest.

4.6 Second or Self Employment

While second or self-employment is against the Labor Law of Saudi Arabia, few of the implications constituting Conflict of Interest when an employee is engaged into it;

- intervene with your job and responsibilities as scheduled.
- rival with any of our business in AL NAGHI COMPANY.
- involve the use of AL NAGHI COMPANY's equipment and resources.
- violate the code of confidentiality of our customer's information and business trade secrets.
- has negative implications to AL NAGHI COMPANY's reputation as a business and as a Company locally, nationally, or even globally.

This would include activities like speaking, writing, consulting engagements, and even mentoring or teaching positions where your area of concentration has a Conflict of Interest over that of AL NAGHI COMPANY's business or job responsibilities.

4.7 Non-Profit, Family, Charities, and Community

Although we may hire immediate family members and partners of employees, we still apply the values of equal opportunity. Aspiring family members will be assessed according to/her qualifications, performance, skill set, and experience and there should be no direct reporting relationships between the family member and the employee. Fair labor practice of AL NAGHI COMPANY will merit all aspects of the employment including remuneration package, transfers, and promotions. This is also applicable to internships, training, and short-term employment.

One can participate in any charity function provided that an employee must not participate in any discussions related to the business of AL NAGHI COMPANY. If you will be acknowledging an appointment or designation in a non-profit organization, you must disclose reasonable notice with your direct manager before the acceptance of the role to evaluate possible implications constituting Conflict of Interest.

4.8 Gifts and Entertainment

We practice Fair Business and compete in the market according to our competence and quality in delivery services. Although gift-giving may strengthen our relationships with our stakeholders, this however can constitute bribery and corruption if not regulated seriously. Our code of ethics is particular in identifying manifestations of bribery and corruption. We are responsible for ensuring that no gift practices are allowed in the company.

4.8.1 Giving Gifts

Under no circumstances that you shall give gifts to influence a decision to secure a business dealing with a customer or future customer or business partner. Giving is not allowed in the company. The policy on Anti-Bribery and Anti-Corruption outlines identifiable characteristics of violating the policy and giving gifts to public officials, public employees, among others is one of the many manifestations. Always make sure that even tickets for meals and entertainment may be deemed as bribery and shall be refused when offered.

4.8.2 Accepting Gifts

Soliciting or accepting gifts for yourself in exchange for a business favor is a manifestation of bribery and corruption. We should always attempt to refuse the offered gifts, however, if the refusal to accept the gift may undermine the established customer or business partner's relationships, make sure to disclose to your manager or HR to assess permissibility is deemed appropriate.

Few of the common instances of when we may be allowed to receive gifts without violating the policy;

- citations and Awards from a non-profit organization to recognize the business contribution and accomplishments, and;
- meals and entertainment as part of the package for meetings and other business-related occasions following these criteria;
 - (1) employee's attendance is necessary to the business,
 - (2) the host is present,
 - (3) it is a legitimate business meeting and coordination
 - (4) the expense is of reasonable and justifiable amount, and
 - (5) it is done in a frequency that is not excessive.

5. Harassment, Bullying, and Discrimination

We seriously observe a zero-tolerance community for bullying, discrimination, and harassment. We do not encourage actions and engagements that will violate our policy on bullying, discrimination, and harassment. Remarks which regards a person's color, race, sexual orientation, religion and cultural preference, genetic information, and other factors protected by laws are not welcome but instead can be used as grounds for disciplinary actions up to and including termination of an employment contract.

Harassment, bullying, and discrimination complaints are often associated with risk. We promise to deliver a risk-free working environment and we keep that promise by mitigating risks through scheduled risk assessment per management system. We have incorporated in the employee handbook the procedure in reporting bullying, discrimination, and harassment.

Since we do not tolerate bullying, discrimination, and harassment in the business premises of AL NAGHI COMPANY, we too have the same stand concerning Retaliation. See *Non-Retaliation Policy*. We practice zero-tolerance in Retaliation against anyone who in good faith raises valid bullying, discrimination, and harassment complaint. Retaliation may not only be a policy violation but can be treated as illegal. Retaliatory behavior will be investigated and may lead to disciplinary action of suspension or up to and including termination of employment contract depending on the gravity of the offense.

Tips of Ponder!

- *Making false accusations of unethical and illegal infractions tantamount to a serious violation of the code. This will not just extensively jeopardize the character and reputation of the person but also undermines our reporting process.*
- *A proven unethical or illegal act that harms an individual or the company's reputation cannot appeal for a justification that it was not intentionally done but rather because of the instruction from a fellow employee thus such an act was made.*

6. Anti-Bribery and Anti-Corruption Campaign

Just like the Codes for Bullying, Harassment, and Discrimination, bribery and corruption are strictly prohibited in AL NAGHI COMPANY's businesses in however form it is manifested. This policy is for strict compliance and any participation in such an act constitutes a violation that will undermine the reputation of the company. We prohibit our people from offering or giving and soliciting or receiving anything from a government official, customers, third party, or other people in exchange of an act that will favor collusion; influence a decision; secure a commercial; contractual, or legal advantage; dismiss disadvantage, or retain or obtain business.

Below are possible scenarios of bribery and corruption;

- payments or payment requests in cash made through a third party or country outside of the normal payment process of AL NAGHI COMPANY.
- agreed to engage business to a potential customer which has known corruption and bribery practices.
- working with customers or potential customers who have direct relationships with other business competitors of the same line of business.
- irregularity on fees or commissions outside of what is normal and authorized.
- request for invoices or expenses that are not according to the established procedures of the usual payment method.
- gifts or payments to influence a decision to award a contract.
- gifts or payments to seek information of activities of competitors.
- endorsement of an unfit referee in exchange for securing an award of contract or business.

Our regards to Reputation and Trust as our foundation have enforced this policy to assure the business community that we are a compliant company and part of our culture and values are to ensure that we act in a manner of puts the interest of our customers and the community as our priority. If you think that this code is violated, please refer to the procedure in raising complaints or advise your supervisor to document the incident. Violations of the code will merit our people appropriate sanctions of up to and including termination of a contract. We encourage our people to know the policy by heart and if in doubt, you can always tap our compliance team for questions and clarifications. See *Anti-Bribery and Anti-Corruption Manual*.

7. Our Culture of Respect

7.1 Respect to Inclusivity

The diversity of culture and people working in AL NAGHI COMPANY is never an impediment to its success. It, on the other hand, has opened limitless potentials which provide an overwhelming synergistic effect in its business framework and to its business dynamics. One of the core values of the company is to provide our people with equal opportunity to speak and be heard. As a result, ideas and perspectives from our employees became our tool in identifying the gaps in the business and have allowed us to innovate our strategies bringing us into the market competition. Inclusion and collaboration are defined as essential values too of AL NAGHI COMPANY which promote growth and development.

Although diverse, we remain focused, flexible, and constantly adapting to changes in market dynamics. We consider our market as multicultural and diverse too. Hence, we continue to attract the right talents matching our requirements without regard to color, race, sexual orientation, religion, and cultural preference. Moreover, it will enhance the company's reputation as a business organization with a strong community engaging attribute. We continue to evolve as a responsible business organization to satisfy the market needs and to be part of everyone's success including the community from where our presence is visible.

7.2 Respect to the Environment

We understand our role in the community we live in. We adhere to the requirement of becoming a fully compliant company that can sustain development without contributing harm to the community through an effective environmental management system. We, therefore;

- commit to comply with the environmental requirements by addressing our direct and indirect contribution to environmental adversaries.
- promise to deliver a sustainability plan based on the yearly CSR report of the company.
- continue to practice high ethical standards in doing business which will foster strong relationships in the business community.
- continue to work with other sectors – local or international – in addressing environmental and socio-economic issues relevant to business development and sustainability.
- engage in an active role and take the lead in adhering to the UN standards of upholding human rights, Anti-bribery, Corruption, and discrimination.
- ensure active participation and involvement in charitable organizations which aim to help and the transformation of distressed communities.

7.3 Respect to Our People

7.3.1 Safety First!

The safety of our people comes first. Our policies are set to maintain the order and safety of the people working in AL NAGHI COMPANY. The establishment of the organization's Occupational Health and Safety Management System following ISO 45001:2018 Standards Certification last August 2018, provided our people the added value of comfort, safety, and security while at work.

Under no circumstances that we allow violence, intimidation, and physical threatening incidences or behaviors from our people. We make sure that security protocols are being strictly observed and followed. Weapons that may harm anyone in the business premise of AL NAGHI COMPANY are strictly prohibited. However, this may not be the case for law enforcement agencies or designated security officer/s.

We continually provide our people with the right amount of knowledge particular to occupational health and safety through regular induction and facility audits.

7.4 Respect to Confidential Information

Breach of information is an offensive action that jeopardizes the built Reputation and Trust of the company. It exposes the company to a security threat, penalty, lawsuits, etc. Disclosure of pertinent and other classified information such as business trade secrets, employee information, business financial dealings, etc., are examples of infractions of the confidentiality clause of AL NAGHI COMPANY. Our role as an employee is to make sure that we understand our responsibilities and accountabilities in the company. However, understanding may not be enough unless we apply this set of policies in our daily endeavors in the company. If in doubt, you may always tap your supervisor or reach out to the compliance team for questions and clarifications. Remember that it is always a wise action to ask questions whenever necessary. If you think that these codes are violated, you may escalate the complaint/s to your supervisor and have it documented. We value every interaction with our people and treat each other with respect.

7.4.1 Securing Customer and other Confidential Information

We assure our customers that we adhere to the compliance requirements of securing confidential information. The security of our customer's information and other confidential trade secrets is our utmost responsibility and accountability. A breach of Trust will score the company a low reputational remark and puts the company at risk of losing existing or potential business partners.

Information security is one of the most vulnerable types of security in the business. It could not just only potentially steal a significant amount from our and/or our customer's personal and financial information but also have a serious reputational impact. The number of years of hard work and dedication to build Reputation and Trust is no match to a single bad reputation a company has committed.

Our trail of communications to our customers through electronic mails, business correspondences, quotations and documents, financial receipts, etc. which may contain business trade secrets are considered as company property. Therefore, it is expected of you to carry this information properly and securely. We have Information Security Guidelines that will provide our people with the right amount of understanding on how to safeguard delicate information. Our Policy on Information and Data Security is set to provide our people with all of what Information Security and its risk exposure, is all about.

7.4.2 General Requirements of Information and Data Security

- get familiar with the classification of information and apply the knowledge when handling Public, Internal, Confidential, or Customer Confidential documents.
- encrypt any sensitive information when sending it electronically.
- do not share your log-on credentials with your colleagues.
- always secure approval from authorized personnel when trying to use external storage or when downloading materials online.
- lock your PC when moving away from your desk.
- do not forward any confidential information to your colleague if not necessary or outside of the company's email network.
- when issued with company laptop or mobile devices, take extra precaution from theft incidents whether the device may or may not contain confidential information. If so, immediately report the incident to the I.T. department.
- do not share information tagged as confidential to your colleagues whether inside or outside of AL NAGHI COMPANY's business premise.
- always remember to secure with care information, especially when transporting physical documents or media containing confidential information from one place to another.
- under no circumstances that you should alter any default setting in your PC and other electronic device used primarily for business purposes only.

- do not access information not related to your role or your line of business unless you are asked to do so by an authorized company officer.
- take and complete the mandatory Information and Data Security Training.

7.5 Respect to Human Rights

We take pride in ethically doing business. Our Policy on Labor and Ethics detailed our human rights and equal treatment practices in the company. We further nourished the policy along with the Bullying, Harassment, and Discrimination Code. We align our procedures, policies, and practices with United Nations Global Compact Principles. We do not employ underage workers and under no circumstances that we allow exploitation, forced labor, and other forms of physical and emotional abuse. If you feel that these codes are violated and misused, you may tap your supervisor, HR, or the Compliance Department to document your complaint/s.

8. Fraud

Honesty is a manifestation of respect. Respect is one of the values we practice and sustain in our culture. We resonate the value of Respect to everyone including Company assets and property. We require our people not to engage in any fraudulent or dishonest behavior inside and outside of the company's premises. Dishonest conduct involving personal information (misrepresentation of credentials), company property or financial reporting and accounting (tampering of data) in AL NAGHI COMPANY or any third party that we have business dealings entails disciplinary sanctions of up to and including termination of contract or which may progress to criminal charges depending on the gravity of the impact.

9. The Organization's Responsibilities

We have defined responsibilities into two (2) separate entities; (1) **Individual Responsibilities** and (2) **Management Responsibilities**. Each of the described entities may be distinct but has an equal burden of responsibilities to the company and the community.

9.1. Individual's Responsibility

- Be Proactive – Involve yourself in relevant training, communications, etc. that can contribute to personal and professional growth.
- Stay Tuned – Collect resources that will update your skills, particularly in your role whenever necessary. It may involve updated laws, professional standards, and policies being practiced internally or externally.
- Be Responsible and Accountable – We encourage our people to know by heart the established policies of the company which is relevant to the values and culture we practice every day. We safeguard the core foundation of our existence as a business to protect our future investments.
- Speak Up – The value of equal opportunity plays a significant role in establishing voice to every active employee of the company. It is highly encouraging for you to speak up in instances of human rights violation, harassment, discrimination, bullying, and other related sources of injustice to the appropriate escalation body.
- Ask Questions – There may be times that you will get confused or doubt a certain parameter in your role. Always remember to safeguard the Reputation of the company. Always refer yourself to our policy manuals for justification and clarification. However, in instances that are not clearly defined in the manuals, you may consult appropriate person/s to sway you away from getting into trouble.

9.2 Leaders Responsibilities

- Act as a True Leader – Always consider doing the right thing all the time.
- “Walk the talk” would mean to justify your actions with the words you preached to your team. A leader can't be effective when your practices digress from what is expected of you from your team.
- Be a Supportive Team Lead – To sway away your people from embarrassment and violations, always ensure your people's understanding of our ethics and codes of conduct. Provide them with the necessary training of the enforced policies to avoid violations.
- Develop a Potential – Consider being keen on observing weak points and potentials from your team. Set clear measurable KPIs to assess and evaluate their skill set.
- Uphold the Brand Promise – We aim to become the best in class. Hence, we continue to uphold our brand promise of quality service, compliance, and fairness. Secure the promise by constantly engaging yourself to the team whenever is necessary to remind the team of strict compliance to the enforced policies.
- Be Responsible and Accountable – Blame is not the name of the game. Take full responsibility and accountability in every valid shortcoming from one of your team players whenever it happens and process resolutions and action plans to prevent it from happening again.

10. Protecting Company Assets

We provide our people with all of the resources necessary to function well in/her role in the company. That includes access to the company's network, equipment, facilities, trade secrets, intellectual property, documents, etc. These are the company's property and are expected to be used appropriately. Misuse and intentional malice may irreparably damage our Reputation and Trust. Handling cautiously these resources would mean protection from theft, loss, damage, or abuse.

10.1 Company Resources

We encourage our people to safeguard and efficiently utilize all the available Company resources. Company resources include facilities, equipment, information technology, trade secrets, financial assets, intellectual property, and other tangible and intangible assets. These resources are to be used ONLY for business purposes. We extend the use and safeguard of these resources as an obligation for our employees to protect the interest of the company and our stakeholders. Under applicable laws, the company reserves the right to monitor and assess how these assets are used. Assessment may include email, data, and files saved in Company Network Terminals.

We prohibit the use of these assets under these circumstances;

- engage in unethical or illegal activities, for example, gambling.
- use of the resources in political activities other than business purposes.
- use of the company's information technology asset as storage of offensive materials which undermines the values of respect and harassment-free working environment.

10.2. Intellectual Property

Intellectual property is intangible company property. In as much as the company has entrusted you to utilize all the necessary assets including intellectual property (Copyrights, Patents, and Trade Secrets) you are responsible to safeguard these assets against unauthorized access and unlawful use and disclosure. Under no circumstances you are allowed to use the company's intellectual property for personal gain.

11. Who Must Adhere to the Code?

The established Business Ethics and Code of Conduct of AL NAGHI COMPANY is for everyone to follow. It is a non-negotiable compliance requirement to get familiar with your responsibility as an employee of this company. We repeatedly emphasized how important Reputation and Trust are in this Company. As an employee of AL NAGHI COMPANY, we, therefore, expect you to religiously follow our ethical standards and under no circumstance that you should violate any of the codes presented.

The Code demands you to observe full confidentiality of the terms and conditions of your employment which includes your remuneration package or disclosure of any trade secrets from our business partners as part of your role. In cases where an investigation is progressing, unless you are authorized to disclose information, your communication remains limited. Type of communication is either verbal or written and under no circumstance should you participate in an investigation without the approval of the company.

Violations of the code may affect your future endeavor with AL NAGHI COMPANY and its business partners. Anyone who violates the code may face disciplinary action up to and including termination of employment depending on the gravity of the infraction.

There will be no violation if you discuss these topics amongst your co-employee. Should for instance you feel that this Business Ethics and Code of Conduct is violated;

- you may access the helpline or contact your line supervisor and have the complaint documented;
- contact the Human Resources Department;
- refer any code clarifications to The Business Ethics Code of Conduct Manual of the Company;
- email the speak-up and CSR helpline; speak_up@alnaghi.com, csr@alnaghi.com, or;
- call speak-up hotline at +966 (12) 633-8588