



The Arab Contractors
(Osman Ahmed Osman & Co.)

Code of Ethics and Business Conduct

Introduction

This Code of Ethics and Business Conduct explains the standards of behavior that **The Arab Contractors** (Osman Ahmed Osman & Co.) expects of you in your daily activities and dealings with others. The Code cannot foresee every situation that might arise. Rather, it identifies guiding principles to help you make decisions consistent with **The Arab Contractors'** values and reputation. You should also familiarize yourself with various corporate policies that provide more detailed guidance on specific issues that may affect your work, such as international business and marketing; Internet policy; health, safety and the environment ; and human resources.

This Code serves as a reminder that belonging to the **Arab Contractors** involves more than just strict compliance with applicable laws and regulations. In it, we set out the principles of business ethics that must guide our conduct under all circumstances and in all countries. We state clearly that **The Arab Contractors** expects each and every one of its employees to demonstrate exemplary conduct based on integrity, loyalty and respect for the dignity and individual rights of employees.

Who Must Follow The Code

This Code applies at all times, without exception, to all members of the Board of Directors and all **The Arab Contractors** employees. **The Arab Contractors** (Osman Ahmed Osman & Co.) suppliers and partners, as well as third parties (such as agents), are also expected to adhere to the Code when dealing with or acting on behalf of **The Arab Contractors**.

Which Laws Apply

As an international corporation, **The Arab Contractors** (Osman Ahmed Osman & Co.) does business in many countries around the world. As a result, we are subject to the laws of many jurisdictions. **The Arab Contractors** and its employees must obey the law in each jurisdiction where the Corporation operates. If a conflict should arise between the applicable laws of different countries where **The Arab Contractors** does business, or between **The Arab Contractors** Code and any law or regulation, the matter should be brought to the attention of **The Arab Contractors** Legal Services representative.

The Arab Contractors Core Values

Company Vision

Our Vision was built on maintaining our regional leadership position and expanding our Markets

We aim to be amongst the top construction organizations working in the Middle East and Africa within the next five years

Values

Our values define how we do business and interact with our Employees, Partners and Employers. Our core values are integrity, trust, responsibility, respect and pioneering. As we expand into new markets, recruit new talent and face new challenges, these guide our people in the decisions and actions they take every day.

Mission

- We are committed to provide high standard services and products that are fit for purpose
- We aim at satisfying our customers by providing best value for money
- We are committed to quality and preserving the environment
- We believe that our development is strongly related to the development of our human resources through training
- We promote an environment of competitiveness amongst our employees to promote their sense of leadership and team working

The Arab Contractors

Code of Ethics & Business Conduct

The Arab Contractors Code addresses ethical conduct in relation to the work environment, business practices and relationships with external stakeholders.

Work Environment

Under the **The Arab Contractors** Covenants, we encourage openness to transparency, Team work and trust. Our success depends on our ability to build dynamic, diverse, mobile teams whenever and wherever they are needed. We respect each other and value the diversity that comes from our different backgrounds, experience and views. **The Arab Contractors** treats all employees fairly, ethically, respectfully and with dignity. The Corporation offers equal employment opportunities without regard to any distinctions based on age, gender, sexual orientation, disability, race, religion, citizenship, marital status, family situation, country of origin or other factors for discrimination, in accordance with the laws and regulations of each country where it does business. **The Arab Contractors** does not tolerate activities that support trafficking in persons or the use of child labor or forced labor in the performance of **The Arab Contractors** contracts by our employees or our sub-contractors.

Harassment and Personal Security

The Arab Contractors policies protect employees from harassment, bullying and victimization in the workplace, including all forms of sexual, physical and psychological abuse. As an employee, you are entitled to, and are expected to preserve, a positive, harmonious and professional work environment.

Health, Safety and the Environment

The occupational health and safety of employees and environmental protection are priorities at **The Arab Contractors**, where they are regarded as a fundamental corporate social responsibility. We strive to reduce the impact of our activities and of the performance of our products on the environment, and work towards a “total life-cycle” view in product design, while maintaining our competitiveness. **The Arab Contractors** and its employees comply with all applicable laws and regulations. We adopt standards, procedures, contingency measures and management systems to ensure that our operations are managed safely, ecologically and in a sustainable way. To protect their own safety as well as that of their colleagues and communities, employees undertake not to work under the influence of any substance that could impair their judgment or interfere with the effective and responsible performance of their duties.

Company Property

Company property should only be used for legitimate business purposes. **The Arab Contractors** employees are expected to take good care of company property and not expose it to loss, damage, misuse or theft.

Intellectual Property

Intellectual property comprises trademarks, domain names, patents, industrial designs, copyrights and trade secrets. Employees have a duty to protect **The Arab Contractor's** intellectual property, just as they have the obligation to respect that of others. Subject to applicable laws, any inventions or discoveries made by employees during the course of their work are **The Arab Contractor's** property. Intellectual property is considered confidential information. Therefore, it is covered by the non-disclosure guidelines set out in the "Confidential Information" section of this Code.

Electronic Mail and Internet Usage

The Arab Contractors' electronic mail and Internet systems are provided for business use. When using electronic mail, you should remember that it is susceptible to interception, creates a permanent record, can be printed or forwarded to others by the recipient and will likely be retained on the recipient's computer for a long time. Therefore, exercise the same care in sending electronic mail as in other written business communications. Never use **The Arab Contractors'** Internet connection or computer equipment to access, transmit or download content that is inappropriate and does not meet business requirements.

Gifts and Entertainment

Employees, suppliers, partners and other third parties representing **The Arab Contractors** must avoid giving or receiving gifts or entertainment if these might improperly influence the recipient's judgment or might be perceived to do so. Gifts can include goods, services, favours, loans, trips, accommodation or use of property, etc. Sometimes in business, for example, in certain cultures, an exchange of gifts is appropriate. In such instances, the gifts should be reasonable, in good taste, and have token or nominal value. Employees must never give or accept gifts when prohibited from doing so by law or by the recipient's or donor organization's policies.

Conflicts of Interest

Employees must avoid any relationship or activity that might impair, or even appear to impair, their ability to make objective and fair decisions when performing their jobs. They should avoid conflicts of interest between themselves and the Company.

Here are some other ways in which conflicts of interest could arise:

1. Being employed (you or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while you are employed with **The Arab Contractors**.
2. Serving as a board member for an outside commercial company or organization.
3. Owning or having a substantial interest in a competitor, supplier or contractor.
4. Having a personal interest, financial interest or potential gain in any **The Arab Contractors** transaction.
5. Placing company business with a firm owned or controlled by a **The Arab Contractors** employee or his or her family.
6. Accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier, unless equally available to all **The Arab Contractors** employees.

Anti-Corruption Laws

The Arab Contractors complies with anti-corruption legislation in all its aspects. This all includes the Corruption of All Public Officials Act of Egypt (and its amendments), which applies to The Arab Contractors global business. The Arab Contractors employees, suppliers, partners and other third parties (such as agents) must never make or approve an illegal payment to anyone, under any circumstances. If you are authorized to deal with third-party agents, you must comply with **The Arab Contractors'** Policy Concerning Practices in Business and Marketing.



****Further Guidance**

If you are facing an issue about anti – corruption compliance, consult the Legal Department , **The Arab Contractors'** chief ethics and compliance officer representative identified .

Violation

How to Report a Violation

The Arab Contractors depends on its employees to report violations or potential violations of the **The Arab Contractors** Code of Conduct so that the company can take the appropriate action and remedy the situation.

Several different channels of reporting are available, depending on the issue, including:

- Your supervisor
- A higher level of management
- Your ethics and compliance officer
- The Environmental, Safety & Health Department
- The Human Resources Department
- The Legal Department
- The Internal Audit Department

Relationships with External Stakeholders

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Customers

The Arab Contractors is committed to meeting the needs of its customers and strives to provide high-quality services and products. In customer relationships, employees behave in an ethical fashion. Sensitive, private or confidential customer information is safeguarded according to **The Arab Contractors'** standards, with access restricted to those who have a need to know.

Suppliers, Partners and Third Parties

The Arab Contractors suppliers, partners and other third parties must know and agree to comply with the Code. All agreements with suppliers, partners and third parties must be in writing and must specify the goods and services to be provided and the fees to be paid. Such agreements must be in line with reasonable competitive and market practices, the principles established in this Code and relevant corporate policies.

Competition

The Arab Contractors employees and suppliers, partners and third parties must never employ unethical or illegal practices to collect competitive intelligence. **The Arab Contractors** complies with antitrust laws wherever it does business. In general, we must guard against:

- Price-fixing or arranged market segmentation; or
- Monopolistic behavior that aims to reduce competition

Governments

Given its international and diversified nature, **The Arab Contractors** is subject to a great variety of national and local laws and regulations. The Corporation and its employees and partners comply with all legal and contractual obligations in dealing with the various governments and regulatory agencies with which they are in contact. Employees and partners of **The Arab Contractors** who deal with government officials and negotiate contracts are responsible for knowing and complying with all applicable laws and regulations, including those pertaining to lobbying activities.

Whistleblowing procedure

If an employee wishes to report a behavior or a situation that contravenes these rules, he or she may use the whistleblowing procedure that may be in place within his or her company or the whistleblowing procedure within the Group, in compliance with the law and rules applicable to the country in which he or she resides or works.

Proposal Regarding Whistleblowing

Whistleblowing is the raising of a concern about malpractice within an organization. Such malpractice could for example be:

- a criminal offence
- a failure to comply with legal obligations
- a miscarriage of justice
- a health and safety danger
- damage to the environment
- a deliberate concealment of information

The Arab Contractors Co. wishes to encourage an open culture in the dealings between its managers, employees and those with whom it engages in business or legal relations. Whistleblowing is a valuable contribution to the company's efficiency and long-term success. The company's whistleblowing policy is therefore made available through the Company Intranet and the Company Finance Policy & Procedure manual.

Anyone becoming aware of a malpractice should in the first instance report it to the Human Resources or Finance Director of their employing company, who will carry out an investigation. If the whistleblower asks for the concern to be treated confidentially, such request must be respected but the whistleblower should in turn not discuss the concern with colleagues or other third parties, unless required to do so by law.

Appropriate confidentiality will be accorded, and protection given, to any employee who raises a genuine concern. All concerns raised will be properly considered and dealt with as appropriate. No employee will be punished for raising a genuine concern.

The outcome of any investigation will be reported back to the whistleblower. If the whistleblower is dissatisfied with the response to the concern which he has raised, or if



the concern relates to a matter of exceptional gravity or sensitivity, he can contact the Head of AC Complaint Manager either on the special hotline telephone number or by email. The Head of AC Complaint Manager will carry out an investigation and notify the whistleblower of the action taken.

The person to whom the malpractice is reported should establish:

- the behavior complained about
- the people involved
- any witnesses
- the dates, times and locations
- the relevant company and branch
- any physical evidence
- any perceived physical danger or threat.

AC Complaint Manager will monitor the effectiveness of the Whistleblowing procedure as part of their audit of individual business units. Common issues will be identified and, if sufficiently serious, reported to the Executive Committee.

Sanctions

It is recalled that these rules, which have been examined and approved by **The Arab Contractors** Executive Committee, **are compulsory** and that everyone within the Group is subject to them, whatever his or her position. Any failure on the part of an employee to comply with these rules constitutes a fault and may be subject to appropriate sanctions and punishments by his or her employer within the Group. Appropriate sanctions and punishments will be those laid down by law applicable to the employee concerned, and will comply with applicable legal procedures, in particular those concerning the rights and guarantees applicable to the employee concerned. Such sanctions may notably, in compliance with applicable law, include dismissal for fault and damages claimed by **The Arab Contractors**, even if the failure to comply with the rules was detected by the Group itself as part of an internal control procedure.