



Code Of Conduct

Arabian contracting Company WLL

Company Document

Code of Conduct

1. PURPOSE AND APPLICABILITY

This Code of Conduct for Business Partners of Arabian Contracting Company WLL "ACC" ("Code of Conduct") is released to promote and ensure the absolute integrity of ACC (hereinafter referred as "ACC" or "Company") business dealings with its Business Partners. It is intended to establish clear compliance standards and ethical principles to be obeyed by all ACC Business Partners ("Business Partners").

This Code of Conduct applies to all Business Partners and their employees, temporary workers, agents, subcontractors, and similar individuals or entities. Business Partners refer to any party that (i) sells ACC products or services or (ii) provides products or services to ACC, including but not limited to ecosystem, supplier, agent and consultant. ACC expects all our Business Partners to be familiar with and comply with applicable laws and regulations and demonstrate high standards of business ethics.

2. LEGAL COMPLIANCE

2.1. General legal compliance

Business Partners must comply with applicable laws and regulations in force in their place of incorporation and the places in which they operate as well as any applicable international laws and rules. Business Partners are expected to ensure cooperation with ACC will not be negatively affected due to legal compliance problems.

2.2. Labor protection

Business Partners must provide their employees with a healthy work environment where they are treated with dignity and fairness and ensure that their employees are free from discrimination or harassment for any reason whatsoever, including skin color, ethnicity, age, gender, sexual orientation, religion, or political affiliation.

2.3. Environmental compliance

Business Partners must conduct their operations in an environmentally responsible business manner and in strict compliance with applicable environmental laws and standards



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2.4. Government customers

Business Partners must comply with all applicable procurement laws when conducting business with governments, public institutions, state-owned enterprises, governmental departments, semi-governmental bodies or local authorities where such additional bidding or procurement regulations apply.

2.5. Anti-bribery

Business Partners shall not offer, make or receive any form of business bribe in order to win or retain business or seek to influence a business decision inappropriately. This shall include offering or providing any gift or hospitality, which is excessive or inappropriate in nature for the purpose of obtaining any improper advantage or illicit benefit.

2.6. Unfair competition

Business Partners shall not monopolize the market or engage in any unfair competition practices individually or in collusion with others. Typical examples of this conduct include but are not limited to practices that damage the rights and interests of end users: (i) Dividing markets through agreement or collusion; (ii) Fix resale prices; (iii) Coordinating in competing bids; (iv) Requiring purchase of tie-in products; and (v) Abusing a dominant position in the market.

2.7. Cybersecurity

Business Partners shall strictly abide by all applicable laws and regulations regarding cybersecurity, data protection and money laundering of the countries in which they operate and shall not infringe the freedom of communication and privacy of end users.

2.8. Export control

Business Partners shall strictly abide by: (i) The applicable laws, regulations, and resolutions regarding export control of the countries in which they operate; and (ii) Any export control laws of the State of Kuwait.

3. BUSINESS ETHICS

3.1. Complete and Truthful Materials

Business Partners must ensure that all materials they provide to ACC are truthful, factual, legitimate, and valid and that full authorization has been obtained from third parties if the materials contain any confidential information related to a third party. Partners must also acknowledge that all information they provide to ACC, including but not limited to purchase orders, sales reports, special price applications and changes to important company information, are truthful, accurate, and complete.

3.2. Falsified Revenue

Business Partners are not allowed to assist ACC employees in recognizing falsified revenue, recognizing revenue in advance, or delaying revenue recognition by such means as creating fraudulent projects, inflating customer requirements, signing



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multiple contracts for the same project, or providing fraudulent receipts or acceptance reports, neither are Partners allowed to forge/falsify stamps, official documents, or correspondences of ACC in any form.

3.3. Lawful Acquisition and Use of Competitor Information

Business Partners are prohibited from using any illegal or unethical means to acquire and use trade secrets or other confidential information of others, including but not limited to improper solicitation or receipt of confidential information from customers, a competitor's employee, or any other party, whether or not such information is owned by the competitor or the third party.

3.4. Marketing Communication and Advertising Media

In the course of marketing communication, Business Partners shall not make false/misleading statements or exaggerate product performance. Without prior permission from ACC, Business Partners shall not disclose information regarding their projects in cooperation with ACC to the media.

During external business interactions, Business Partners shall not make any false or misleading statements to any party.

3.5. Unauthorized Commitments

Business Partners shall not make commitments to end users or any third party on matters in which they have not been authorized in writing by ACC employee with such express authority to do so.

Any losses incurred by ACC from a Business Partner's unauthorized commitment or its failure to reject the unauthorized commitment of ACC employees (i.e. those ACC employees not expressly authorized to make such a commitment) shall be fully borne by the Business Partner on a full indemnity basis and ACC shall not be obligated to any contractual commitments to Business Partner arising from such actions.

3.6. Intellectual property rights and confidential information

Business Partners shall respect ACC's intellectual property rights. Without prior permission, Business Partners shall not disclose any confidential information they have access to during their dealings with ACC intellectual property except in accordance with any applicable license granted by ACC.

4. COMPLIANCE MANAGEMENT

4.1. Establishing a Compliance System

ACC encourages all Business Partners to establish their own internal compliance management system to ensure compliance with all applicable laws and regulations, including without limitation, such laws and regulations related to fair competition, sanction, export control, and alignment with ACC's policies



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4.2. Communicating ACC's Principles

Business Partners shall make this Code of Conduct available to their respective Partners or develop an equivalent document with standards not lower than those contained in this Code of Conduct.

4.3. Strict employee management

Business Partners must strictly manage the conduct of their employees, ensure employees abide by their own business conduct guidelines, and require their employees to abide by this Code of Conduct.

5. MISCELLANEOUS

5.1. Version Update

ACC will post this Code of Conduct on ACC's official website. ACC reserves the right to supplement and change this Code of Conduct at any time. Business Partners are expected to monitor the website regularly for changes to this Code of Conduct.

5.2. Submitting Questions or Reporting Violations

If you have any question about this Code of Conduct or become aware of any violations of this Code of Conduct that is believed in good faith to be either an actual or potential violation of this Code of Conduct, please send an email to gsi@accwll.com. Please submit the questions or report any suspicious behavior which may constitute a violation with your real name attached.

Please note that the information that you provide to ACC must be truthful, accurate and complete to the greatest extent possible. If necessary, ACC expects you to reasonably assist with any investigations into the incident or situation that you report, including providing reasonable access to any associated within Business Partner control. Reporting misleading or defamatory information to ACC may result in ACC's immediate termination of your business relationship with us.

Exceptions and variations

Other exceptions and variations from these regulations must be reviewed by the Legal Department and approved by the CEO.

Owner and Interpretation

The owner of this Regulation is the Chief Business Development Officer "CBDO" and the CBDO shall interpret and manage these regulations.

Effective dates

This Regulation shall be valid from the date of creation and availability on the website.