

CODE OF BUSINESS CONDUCT & ETHICS POLICY

Introduction

This Code of Business Conduct and Ethics (the "Code") provides guidelines for the conduct of all employees, officers, and directors of Abdullah Al-Khrinej General Trad. & Cont. Co. W.L.L., ("the Company") in the construction, precast, and chemical trading industry in Kuwait. Our commitment to ethical practices and compliance with all applicable laws and regulations is fundamental to our mission.

1. Compliance with Laws and Regulations

All employees must adhere to the laws, rules, and regulations that govern our industry and business operations. This includes, but is not limited to:

- Local labor laws and regulations
- Health and safety standards
- Environmental regulations
- Anti-corruption and anti-bribery laws

2. Integrity and Honesty

All employees are expected to conduct business with integrity and honesty. This includes:

- Being truthful in all communications and representations
- Avoiding conflicts of interest
- Disclosing any potential conflicts to management

3. Respect and Fair Treatment

We are committed to fostering a workplace that respects diversity and promotes fair treatment for all employees. This includes:

- Preventing discrimination and harassment
- Promoting equal opportunities in hiring, promotions, and training
- Encouraging a culture of respect and collaboration

4. Health and Safety

The Company prioritizes the health and safety of all employees. We will:

- Comply with all applicable health and safety regulations
- Provide necessary training and equipment to ensure a safe work environment
- Encourage employees to report on any unsafe conditions or practices

5. Environmental Responsibility

As a construction and chemical trading company, we recognize our responsibility to protect the environment. We will:

- Comply with all environmental laws and regulations
- Minimize waste and promote sustainable practices
- Encourage employees to engage in environmentally friendly practices

6. Confidentiality and Privacy

Employees must respect the confidentiality of sensitive information. This includes:

- Protecting trade secrets, business plans, and proprietary information
- Not disclosing personal information about colleagues or clients without consent
- Safeguarding confidential documents and data

7. Outside Employment

Employees must not be employed outside the company:

- In any business that competes with or provides services to the company or its subsidiaries.
- In a manner which would affect their objectivity in carrying out their company responsibilities.
- Where the outside employment would conflict with scheduled hours, including overtime, or the performance of the company assignments. Employees must not use

company time, materials, information or other assets in connection with outside employment.

8. Payments, commissions and deductions:

All payments, commissions and deductions must be made in accordance with sound accounting standards, written approval, invoices and correspondence, approved by the issuing authorities based on the approval of the concerned department, by cheque or wire transfer, not in cash—except for petty cash payments, which must be fully disclosed in the accounting records maintained by the company and audited by the company's auditors. All original documents, references, contracts and agreements must be kept in a safe place in accordance with the company's policy.

8. Fair Competition

We believe in fair competition and will not engage in any practices that violate antitrust laws. This includes:

- Avoiding collusion with competitors
- Competing based on merit and the quality of our services
- Complying with all applicable competition laws

9. Employee Conduct

Conduct on Company Business: Dishonest or illegal activities on company premises or while on company business will not be condoned and can result in disciplinary action, including dismissal and legal action. The following illustrates activities that are against company policy, and which will not be tolerated on company premises, in company vehicles or while engaged in company business:

- Consumption and storage of alcoholic beverages or drugs.
- The use of controlled substances, such as drugs or alcohol. The unlawful manufacture, distribution, dispensation, possession, transfer, sale, purchase or use of a controlled substance.

- Driving vehicles or operating company equipment while under the influence of alcohol or controlled substances.
- Illegal betting or gambling.
- Carrying weapons of any sort on company premises, in company vehicles or while on company business.
- No company vehicle is permitted to transport passengers or equipment other than company employees and authorized company equipment.
- All company vehicles must be handled with care and attention to ensure their safety and longevity.

The company reserves the right to inspect any property that might be used by employees for the storage of their personal effects. This includes desks, lockers and vehicles owned by the company. It is a violation of company policy to store any contraband, illegal drugs, toxic materials or weapons on company property.

9. Reporting Violations

Employees are encouraged to report any suspected violations of this Code. Reports can be made to:

- Immediate supervisors
- Human Resources
- Compliance Officer

The Company will not tolerate retaliation against any employee who reports a violation in good faith.

9. Compliance and Disciplinary Action

Violation of this code can result in serious consequences for the company, its image, credibility and confidence of its customers and can include substantial fines and restrictions on future operations as well as the possibility of legal action. Therefore, it is necessary that the company ensure that there will be no violations. Employees should

recognize that it is in their best interest, as well as the company's, to follow this code carefully.

The overall seriousness of the matter will be considered in setting the disciplinary action to be taken against an individual employee. Such action, which might be reviewed with the appropriate Human Resources organization, might include:

- Reprimand
- Suspension
- Reduction in salary
- Demotion
- Combination of the above

The company, in its sole discretion, will determine the disciplinary action appropriate to a given matter. The listing of possible actions is informative only and does not bind the company to follow any disciplinary steps, process or procedure.

The company never has and never will authorize any employee to commit an act that violates this code or to direct a subordinate to do so. With that understood, it is not possible to justify commission of such an act by saying someone directed it in higher management.

10. Review and Amendments

This Code will be reviewed periodically and may be amended as necessary to reflect changes in laws, regulations, and Company policies.

Conclusion

Our commitment to ethical conduct is essential to the success of Abdullah Al-Khrinej General Trad. & Cont. Co. W.L.L. By adhering to this Code, we contribute to a positive workplace and uphold our reputation in the industry.

Approval

This Code of Business Conduct & Ethics Policy has been reviewed and approved by the Management of Abdullah Al-Khrinej General Trading & Contracting Company W.L.L. and shall remain effective until amended, replaced, or withdrawn by the Company.

Effective Date: 12.03.2025

Approved By: R S Rajan

Designation: Director & Managing Partner (Commercial)

Signature: _____

