

Al Hoty Group (“AHG”)

The Code of Conduct
(Integrity and Responsibility)

20 July 2015



Message from Al Hoty Group General Manager

At the start of our current financial year, in October 2014, I had declared 'Business Ethics and Professional Conduct' as the theme for the current financial year. In the light of this theme, we are now pleased to provide you a detailed 'Code of Conduct' prepared in consultation with Ernst & Young, for prompt implementation throughout the Al Hoty Group Companies i.e Al Hoty Stanger Limited Company (Independent Laboratories and Materials Testing), Al Hoty Company Limited, and Associates, Hani Al Hoty and Partners Company (formerly known as H. Al Hoty Contracting Establishment). A significant part of this code of conduct also needs to be implemented by our subcontractors, suppliers, clients and service providers.

AHG's mission is (through the combined efforts and commitment of our people) to achieve continuous improvement in the quality of our services, to anticipate and thus be alert and react promptly to our customers' needs, and thereby to achieve economic growth and enhance our reputation.

We will achieve this together through a commitment to our core values, namely:

- Integrity
- Excellence
- Teamwork
- Responsibility

I am proud of our achievements since Al Hoty Companies were created in 1975. One careless action or decision by any of us can have immediate consequences on a reputation built up over more than 40 years. It is fundamental that each of us preserves and enhances AHG's reputation – This is why we are introducing AHG's Code of Conduct.

With the ever increasing regulations and standards, we must exercise great care when making decisions. It is not sufficient to simply comply with laws and regulations. We must also consider whether our decisions are consistent with our values as these reinforces the way AHG operates.

The Code of Conduct is designed to assist you with your decision-making processes and it sets out the principles of business conduct that we must all follow. This is only a guide and will not cover every specific situation that we face. It is vital that you speak up, consult, or seek advice whenever you are uncertain, something seems to be wrong, or you need advice. The Code of Conduct covers the mechanisms available to you. With regard to speaking up, I am committed to creating an environment in which people can do so without fear of retribution and this is a commitment which all of us are required to honour.

Through our collective efforts, please help AHG achieve its objectives and adhere to the principles of the Code of Conduct.

HANI A. AL HOTY
Group General Manager



Adherence to AHG's Code of Conduct

Our Code of Conduct binds us together and provides us with a common approach to business that reinforces our core values: integrity, excellence, teamwork, and responsibility. With this approach, we aim to achieve greater success and to leave a legacy that can be taken forward by future generations of AHG employees.

The Code of Conduct applies to all AHG employees (full-time, part-time, and temporary staff) and, where appropriate, AHG businesses should provide a copy to non-AHG employees who work at our sites and ask that they comply with its principles.

We are also committed to working with third parties whose standards and principles are consistent with those of AHG. Therefore, we have produced a separate (shortened) code of conduct that asks our subcontractors, suppliers, consultants, joint venture partners and customers to respect our Code of Conduct and values as we are committed only to work with those third parties that share similar values to those of AHG. Moreover, we expect these entities likewise to make similar requests of their subcontractors, suppliers, consultants, and joint venture partners.

How to raise concerns on ethical issues

When trying to understand whether an issue you have identified should be reported, it is often useful to ask yourself some questions about the matter. If the answer to any of them is "no" then this tends to suggest that the matter should be reported:

1. If the matter were reported in the media, would you or AHG be comfortable?
2. Similarly, would you be comfortable explaining the issue to your mother without feeling embarrassed or uneasy?
3. Is the matter in question something that is in accordance with AHG's Code of Conduct?
4. Does your own behavior in relation to the matter set a good example?
5. Have you consulted others regarding the matter and otherwise sought advice as to the right course of action?

For questions or concerns about ethical issues while working for AHG, in the first instance you should discuss them with your AHG supervisor or line manager. However, if you prefer, you can contact someone else in your management structure, a member of the HR Department, or by contacting directly to Mr. Anwar H. Khan (x122) for AHS, Mr. Ibrahim Al Ghunaim (x117). Sometimes, it is simply about speaking to a colleague whom you trust so as to consider your options.



Alternatively, if you do not feel comfortable in raising the matter in the above manner, you may call our designated confidential hotline at any time between 7am and 5pm seven days a week at +966 13 8891000 EXT 124 (Appendix 1 describes how the hotline works), or send an e-mail to Questions@al-hoty.com, with questions on compliance or ethical issues or to report activities that you believe may be illegal or unethical.

This number and e-mail address should also be used to raise concerns about questionable accounting or auditing matters. You must behave responsibly when making reports and do so only where you have reason to believe that there has been a violation and not with the goal of harassing someone, where the report is based only on personal opinion, or relates to a minor issue.

AHG would prefer it if those who make contact provide their name and details as it makes it much easier to investigate the matters raised (the names of the individual(s) raising the concern will be kept confidential by the investigating team). However, AHG employees can also raise matters anonymously if they feel unable to provide their name.

No retribution or retaliation

AHG will not take any action against you, or any whistle blower, provided that you have raised an issue in good faith. In addition, AHG will not tolerate any reprisal or retaliation by anyone against another employee who has raised such an issue in good faith⁽¹⁾ and you will be protected from such reprisal or retribution.

Non-compliance with the Code of Conduct

AHG's management group is responsible for providing leadership and guidance in relation to the Code of Conduct and on how it applies in practice. In turn, they report to senior managers who are required to provide the Group General Manager, with adequate assurance that the provisions of the Code of Conduct are being observed.

The failure of an AHG employee to comply with the Code of Conduct is a failure to comply with AHG policies and processes. It could potentially damage AHG's reputation and is a serious matter that may result in disciplinary action, fines, penalties or even criminal sanctions on individuals and the corporate entities that make up AHG. Therefore, any failure to comply with this Code of Conduct will be investigated fully and appropriate action then taken. This could include a range of outcomes from training, disciplinary or other corrective action right up to and including the termination of employment.

Therefore, if in doubt, always speak up and consult.

¹ A sincere belief or motive without any malicious intent to disadvantage another person



Explanatory appendices to this Code of Conduct

For the benefit of AHG employees, this Code of Conduct includes three appendices as follows:

- Appendix 1 – an explanation of how reports to the hotline, or by email, are handled and disciplinary mechanisms**
- Appendix 2 – a suggested approach for reports that are made in writing**
- Appendix 3 – general and management declarations of AHG employees**



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1. Integrity

1.1 Introduction

1.1.1 One of AHG's core values, AHG's employees must act with integrity (ie be honest and act based on strong moral principles) so that those with whom we interact can rely on us and our actions are consistent with our words. By behaving in such a manner, we will enhance AHG's reputation.

1.2 Fraud, deception and dishonesty

1.2.1 There is no unique definition of fraud. However, it generally involves a dishonest or illegal act or abuse of one's position undertaken deliberately to gain an advantage for that person or another person.

1.2.2 AHG and its employees will not knowingly act fraudulently, whether directly or through a third party. For example, AHG will not submit false or inflated claims to its customers (eg for extension of time or variations) and likewise AHG's employees will not submit such claims to AHG. AHG will claim according to contractual arrangements with customers. AHG employees will only seek reimbursement of expenses properly incurred in carrying out AHG's business.

Illustrative example – the difficult customer

Hypothetical situation

One of your customers has been difficult to deal with and, as result, the project for that customer has not been profitable. A major subcontractor on the project also suffered and has suggested that, morally, it would be appropriate for them to make a claim for additional amounts which you accept and in turn claim from the customer, adding an extra amount to cover AHG's additional costs caused by the customer's behaviour (but there is no proper contractual basis for either of you to make such a claim). What do you do?

Answer

Report the matter to your line manager as required by the Code of Conduct. Overclaims without foundation are tantamount to fraud even though it might be very tempting to try and recover costs from the customer in this situation. Also remind the subcontractor that such an approach is prohibited and request written confirmation from the subcontractor that they had never made such claims on AHG in the past and will not do so in the future.



1.3 Bribery, corruption and facilitation payments

- 1.3.1 We will not offer, give or receive bribes⁽²⁾ or improper payments regardless of their purpose whether directly or through a third party, nor will we take part in any kind of corrupt behaviour⁽³⁾. This is irrespective of whether the conduct involves the bribery of public officials (prohibited by the laws of the Kingdom of Saudi Arabia) or private individuals.
- 1.3.2 In addition, we will not make facilitation payments⁽⁴⁾ or allow others to make them on our behalf. The only exception (which should be reported immediately to AHG and whose nature should be recorded clearly in its books and records) is where you have reason to believe that your safety, liberty, or well-being may be compromised if the facilitation payment is not made.
- 1.3.3 We would prefer to lose business rather than to run the risk of damaging AHG's reputation and even a perception that AHG is associated with bribery can have a significant negative impact on its reputation. In the event that a AHG employee is offered a gift or something that may be construed as a bribe, this must always be reported to that individual's line manager with a request for advice on how to proceed.

² A bribe is an offer, provision, or receipt of something of value (eg cash, gifts, entertainment) as reward for doing something improper, often to win or retain business or to obtain some other improper advantage

³ For example, extortion, embezzlement, cartel operations, collusion or money laundering

⁴ A facilitation payment (sometimes known as a grease payment) is a small-value payment made (or gift provided) to a junior public official to speed up their undertaking of a duty that is part of that official's responsibilities but for which there is no official fast payment tariff. For example, the processing of a residency visa or the clearance of goods from Customs



1.3.4 For AHG's policy on gifts and entertainment, see section 1.5.

Illustrative example – the unwelcome gift

Hypothetical situation

At a business meeting, you are provided with a high-value gift which you cannot refuse because it would be offensive from a cultural perspective. What do you do?

Answer

Report the receipt of the gift to your line manager immediately and seek further instructions. The matter will most probably be escalated to the owner or his nominee who will determine whether it should be returned, donated to charity (with the permission of giver), or handled in some other way. However, the key issue is to report the matter immediately and seek written instructions.

Illustrative example – the Customs Officer

Hypothetical situation

On a business trip overseas, a Customs Officer requested that you pay cash for a service (unrelated to the travel ticket) that was unclear and which did not appear to be a formally recognised official service. You declined to make the payment. What further action, if any, do you need to take?

Answer

You still need to report the matter internally to your line manager. That way, the information is captured and colleagues travelling to the same country can be warned about this practice (of what appears to be a request for some form of facilitation payment) and reminded of their responsibilities under the Code of Conduct.



1.4 Business entertainment, gifts, and hospitality

1.4.1 We will not offer, give, or receive any payment, benefit (eg entertainment or hospitality) which is intended or may (appear to) be construed as a bribe. With regard to the acceptance of gifts by AHG employees (including members of their immediate family⁵), the only circumstances in which they may be accepted are where all of the following six conditions are met:

1. The value of the item is less than SAR200 (SAR500 for business meals, see paragraph 1.5.3) per employee, the value of all gifts (excluding business meals) received by an employee from that entity during a 12-month period does not exceed SAR500, and the acceptance of the gift is approved in writing by the individual's line manager. Where the value exceeds either of these values or the value is not obvious, written approval in advance must be obtained from the individual's line manager and by that person's line manager
2. The provision of such an item is customary and does not create any appearance of impropriety
3. The item imposes no sense of obligation on the receiver
4. The item results in no special or favoured treatment for the giver
5. The item could not be considered extravagant, excessive, or too frequent considering all of the circumstances, including the AHG employee's ability to reciprocate at AHG's expense
6. The provision of the gift or benefit is not concealed in any way, rather it is declared openly

⁵ Spouse, children not treated as adults under the law, and dependent relatives



- 1.4.2 A supplier may not provide gifts to AHG employees with an aggregate value of more than SAR5,000 in any (Gregorian) calendar year and AHG employees may not accept gratuities of cash, or gift cards redeemable for cash, from past, current, or potential suppliers. Any AHG employee who is offered what may be construed as a bribe, or requested to pay something that may be construed as a bribe, must contact immediately their line manager and provide the details of the approach.
- 1.4.3. Customary business meals are considered to be business entertainment rather than gifts. These are routine meals, similar in cost to the cost of AHG employees' meals when they entertain clients. The annual limit on the giving of such meals is SAR500 per head per customer/supplier employee. Similarly, the annual limit for receiving such meals is SAR500 per head per AHG employee per customer/supplier. A separate annual limit of SAR5,000 applies to business meals given to or received by a customer or supplier (irrespective of the number of AHG employees entertaining or being entertained). Exceptions require the prior approval of the Owner.
- 1.4.4 In addition to the restrictions on gifts, employees and members of their families must never accept a loan or payment from a supplier or similar business contact under terms that are not available to the general public.

Illustrative example – the grateful supplier

Hypothetical situation

A significant element of the workforce (labourers) from overseas countries is obtained with the assistance of agents in those countries. You are the individual responsible for liaising with these agents, which compete for business, and one of them offers you a free weekend at a local hotel. What do you do?

Answer

Report the matter to your line manager and politely decline to accept the offer. Acceptance would result in your making a personal gain from a business transaction and could be seen as a bribe.

1.5 Recording of time, cost, and materials

- 1.5.1 Transactions relating to labour charges (including hours worked), expenses, or materials must be recorded accurately in accordance with AHG's accounting and record-keeping policies. This is critical so as to ensure that the correct charges are made for the purposes of customer billing, thereby helping to preserve AHG's reputation and credibility. Inaccurate recording exposes AHG, and the individual(s) who recorded costs inaccurately, to legal action and may also pose a reputational risk for AHG.

Illustrative example – the questionable bid submission

Hypothetical situation

In order to win a contract from a customer, you intend to underestimate certain costs in the knowledge that these can be recovered as overruns once the contract is secured. Is this acceptable practice?

Answer

No. This is a misstatement of the true position and thus misleading and inaccurate.

1.6 Conflicts of interest

1.6.1 Conflicts of interest are situations where there are competing interests which may (appear to) impair our ability to make objective decisions in the best interests of AHG. Typically, these conflicts of interest arise where an employee has a personal or family interest or other relationship which makes it difficult for the employee to (be perceived to) act absolutely fairly and free of bias when representing AHG. Some examples are where an employee:

- Has an interest in suppliers or competitors
- Recruits a family member
- Has a second job (ie in addition to working for AHG)

1.6.2 AHG's policy is that each AHG employee of manager grade or above signs an annual declaration confirming compliance by that employee with the Code of Conduct for the previous year (Gregorian) calendar year along with any ownership, management, or employment interests held. It may be that, in certain situations, AHG will permit potential conflicts of interest to continue to exist but each situation will be judged on its merits and written permissions can be granted only by way of a written waiver by Mr. Hani Al Hoty, AHG's owner (or his authorised nominee).

Otherwise, all employees are required annually to sign a shorter declaration covering training on various topics including training on this Code of Conduct.



- 1.6.3 It may be that a potential conflict of interest arises as a result of an employee being offered a gift, some form of entertainment, or a favour. It is for this reason that this Code of Conduct includes specific guidance on the acceptance of gifts and other hospitality (see section 1.5).

Illustrative example – the son of your close friend

Hypothetical situation

Your close friend wants you to use your influence to secure a job for his son at AHG. What do you do?

Answer

You can advise your friend of the mechanism through which to apply for a job at AHG but make sure that you have no influence over the potential recruitment. Any such influence or other involvement would be a conflict of interest.

Illustrative example – the family business supplier

Hypothetical situation

You and your brother own a company that has received an unsolicited request from AHG to provide a quote to supply certain goods and services. Although you have a minority stake in the business, you are a sleeping partner and the business is run and managed by your brother. What do you do?

Answer

If you are a AHG employee of manager level or above, you should in any event have advised AHG of your interest in the other business in the annual ethics declaration. With regard to the possible role as supplier to AHG, you need to inform your line manager and, under the Code of Conduct, would need to obtain the written approval of the owner, or his nominee, before becoming a supplier. If the relationship is permitted, you should have no dealings whatsoever with matters relating to that supplier.

1.7 Fair competition

- 1.7.1 AHG is committed to operating fairly and abides by applicable antitrust and competition laws. It does not enter into arrangements with suppliers or customers that restrict its ability to compete and is not involved in any understandings or arrangements with competitors relating to the prices at which products or services are sold, the terms of sales, or the number or type of products sold. Any employee who is asked to enter into a type of arrangement similar to those described above should decline to do so and report the issue to their line manager.

Illustrative example – bid rigging

Hypothetical situation

Five contracts have been put out for tender by a single customer. In your view, and by coincidence, there are only five suppliers that could tender for the work. You are contacted by one of the other potential suppliers who suggests that all five of you meet, decide on who will bid lowest for each contract (with the others all bidding higher) so that each entity secures one highly profitable contract. Is this ok?

Answer

No. This is an example of anti-competitive behaviour which breaches the Code of Conduct and results in a manipulated market in that the customer pays more than it should. The matter should be reported immediately to your line manager.

1.8 Accuracy of books and records

- 1.8.1 All entries in our books and records will be made accurately and will reflect fairly the information contained in the supporting documentation. All employees responsible for the creation, processing, or inputting of this information into AHG's books and records are personally responsible for its integrity.

Illustrative example – questionable accounting

Hypothetical situation

Legitimate invoices have been received from certain suppliers on a project which, if booked now, will result in the division for which you work missing its annual budget. Your line manager instructs you to hold back the invoices and only pass them on to the finance department in the next accounting year after the books are closed. What do you do?

Answer

All invoices should be paid in accordance with policy and withholding them may result, wrongly, in the distortion of the financial results. If you cannot convince your line manager to book the invoices now, you need to report the matter to a higher authority or to the hotline.

1.9 Fair, open, and honest communication

- 1.9.1 We are open, honest, and show respect in our dealings with each other and with other stakeholders in AHG. We respond to requests for information from government or the media with courtesy and honesty but only provide responses through those individuals who are authorised to do so.



- 1.9.2 With specific regard to media inquiries, employees must not represent themselves to the media as speaking on behalf of AHG unless they are expressly authorised to do so by AHG's management. Any media inquiries should be referred immediately to AHG's Administration Department (+966 13 864 2642). A team will be made available to act as the direct representative of AHG for liaison with the news media. If the media asks to speak with a AHG subject matter expert, the Administration Department will determine how to respond on behalf of AHG.
- 1.9.3 In the case of an emergency, reporters arriving on the scene will try to gather information from any available source. If forced by the situation to respond to reporters, do not attempt to improvise an answer, do not speculate, and do not downplay the seriousness of the situation. Direct all reporter inquiries to AHG Management and, if they are not on the scene, then to the telephone number +966 13 864 2642 (AHG Administration Department).
- 1.9.4 While encouraging our colleagues to report any irregularity as per the guidelines of this code, it is reiterated AHG will not tolerate any reprisal or retaliation by anyone against another employee who has raised such an issue in good faith⁽¹⁾ and you will be protected from such reprisal or retribution, as per above stated commitment by AHG.

1.10 Handling of inside information

- 1.10.1 Inside information is information not known by the general public. While AHG is not listed on a recognised Stock Exchange, some of its suppliers and customers may be listed. Although somewhat unlikely, a AHG employee may therefore come into possession, through their work for AHG, of material information (ie significant enough to be of interest to investors) about one of these suppliers or customers or a third party. An employee with such information should keep it confidential and should not trade in the shares of the relevant company or advise others to do so.

1.11 Import/export controls and trade restrictions

- 1.11.1 We will comply with applicable laws and regulations when importing or exporting products, services, or information. Most employees will have no involvement in this area of AHG's business but those that do are expected to be familiar with the laws and regulations in, or relating to, the relevant country. The matter needs to be handled carefully as sometimes even the provision of information can be subject to restrictions.

Illustrative example – exporting information/material

Hypothetical situation

(a) *In relation to a project, you are regularly liaising with a customer representative in another country. Does this trigger any export control/sanctions related implications?*

(b) *What about if you intend to submit a proposal to a potential customer in another country where the project is some way off and there would be ample time to secure the necessary export license(s) if the project is secured?*

Answer

(a) *Possibly, it depends on the laws of your employer's country and the laws of the other country involved (and, potentially, other countries as well). Even if authorisation is required (and obtained), the data may need to be encrypted, again subject to the applicable laws.*

(b) *It depends. Again, the applicable laws of the various countries need to be considered. Sometimes the transmission of technical data may require an export licence and/or the submission of a proposal to export something that may be regarded by your government as sensitive.*

This is a complicated area and some countries in the MENA region have been, or are, subject to trade restrictions/sanctions. Always consult with those at AHG responsible for handling these matters.



2. Excellence

2.1 Introduction

2.1.1 AHG is proud of the products and services that it provides and the employees who contribute to them. It is committed to continuing to improve through focusing on customers' needs and on keeping up to date with the latest industry developments. This will help ensure AHG's future success.

2.2 Best quality products and services

2.2.1 We take pride in the quality of the products and services that we provide and listen to our customers, understand their needs, and provide solutions that help them succeed. All of AHG's employees have a responsibility to make decisions in the best interests of AHG as a whole thereby creating a positive image of AHG and engendering customer satisfaction and loyalty.

2.3 Work environment

2.3.1 AHG's employees expect that our working environment will enable them to achieve their goals, to continue to learn, and to express openly their opinions on how they can improve their own performance which in turn should improve AHG's performance. Management has a responsibility to listen to employees' constructive views and to make decisions based on the facts.

2.3.2 AHG is committed to ensuring that all of its customers have a positive experience when working with us. As a AHG employee, you are required to ensure that you:

- Wear professional and appropriate clothing for the type of work you are performing
- Conduct yourself in a professional manner
- Provide customers and suppliers with accurate information
- Carry identification at all times and be willing to show it to customers

2.3.3 If you are unsure about the attire appropriate for the worksite or area in which you work, or are unsure about the type of information to provide to a customer, consult your line manager or AHG supervisor in the first instance.

2.4 Reward is performance-based

2.4.1 We select, place, assess, and reward our employees based on their qualifications, job skills, performance, and contributions they make to the success of AHG.



2.5 Employee opportunities to develop

2.5.1 It is AHG's aim to develop its people as both they and AHG stand to benefit.

Employees will be provided with an understanding of AHG's goals and what is expected of them, along with training to enable them to perform their role.



3. Teamwork

3.1 Introduction

3.1.1 The strength of our team comes from a recognition that, by working together, we can achieve more than when working alone. It is also a result of the diverse backgrounds, skills sets, and experience of AHG's employees.

3.2 No harassment or discrimination

3.2.1 In a work environment free of intimidation and harassment, we treat people fairly and do not discriminate. AHG employees are required to conduct themselves in a professional manner and treat others with respect, fairness, and dignity. AHG does not tolerate harassment or discrimination, including behaviour, comments, jokes, slurs, e-mail messages, pictures, photographs, or other conduct that contributes to an intimidating or offensive environment. Harassment and discrimination can also occur in the form of bullying, initiation activities, or workplace hazing, which can be humiliating and degrading. AHG tolerates no forms of harassment or discrimination, regardless of the other person's willingness to participate and such conduct can result in disciplinary action up to and including termination of your employment with AHG.

3.2.2 AHG employees must comply with applicable governmental and local statutes prohibiting conduct that could reasonably be construed as sexual in nature, or discrimination or harassment based on race, colour, religion, age, sex, physical or mental disability, national origin, ancestry, medical condition, marital status, sexual orientation, gender identity, genetic information, or any other non-job-related factor.

3.2.3 Notwithstanding the above, AHG fully supports the government's Saudization program whose goal is to encourage the employment of Saudi Arabian nationals in the private sector.

3.2.4 Likewise, AHG will not tolerate workplace violence and is committed to maintaining a safe and secure working environment. Acts or threats of physical violence, intimidation, harassment or coercion, stalking, sabotage, or similar activities will not be tolerated. Engaging in acts or threats of violence may result in disciplinary action up to and including termination of your employment with AHG.

3.2.5 You may not bring, carry, store, or use any type of weapon on AHG-owned, leased, or rented property; in a AHG-owned, leased, or rented vehicle; in a personal vehicle while on AHG business; or at a job site (regardless of whether you are performing work for AHG), unless you have the explicit written authority of AHG's top management to do so and the necessary governmental or other applicable approvals have been obtained. A weapon is a firearm, ammunition, explosives, or any device or object that can be construed as a weapon by AHG. Weapons do not include tools that are used for legitimate business purposes.



3.2.6 For the avoidance of doubt, it is against Saudi Arabian law for private citizens to bring, carry, store, or use any type of weapon and AHG will not tolerate any violations of such law. It follows that a failure to comply with this part of the Code of Conduct will almost certainly result in termination of your employment with AHG and the reporting of the matter to the relevant Saudi Authorities to handle as they see fit.

3.3 Child labour

3.3.1 AHG is prohibited from using workers under the legal age of employment in any country in which it operates. If the minimum age of employment is not defined, it will be taken to be 15 years of age.

3.4 Collaboration with other organisations

3.4.1 AHG's strength is a reflection of its ability to establish and maintain meaningful mutually beneficial relationships with its customers, suppliers and others with whom we undertake business. Those AHG employees authorised to do so engage in dialogue with these entities from time to time and also liaise with governmental organisations as and when necessary. This is so as to strengthen these relationships in an environment which builds mutual trust.

3.5 Supplier relationships

3.5.1 We see our suppliers as friends with whom we seek to establish mutually rewarding relationships. In particular, suppliers are an extension of AHG's value chain and, given this, we seek to identify and work with suppliers that demonstrate strong values and ethical principles that mirror our own. Similarly, we avoid suppliers who transgress the laws or fail to adhere to an ethical business framework similar to that which underpins AHG (ie our mission, values, and Code of Conduct).



4. Responsibility

4.1 Introduction

4.1.1 AHG seeks to understand and anticipate the needs of its customers in an environment where its employees make meaningful commitments to each other and to others with whom we work, such as our customers and suppliers. All AHG employees have a responsibility towards complying with health and safety requirements, caring for our environment and community, and managing the business ethically.

4.2 Health and safety

4.2.1 All AHG employees have a responsibility to maintain a safe and healthy working environment and to use safe working practices. We must comply as a minimum with all requisite health and safety rules but also be aware of the risks present in our day to day activities based on an understanding of how accidents occur. It follows that each of us must report for work fit for duty according to our respective role.

4.2.2 AHG strives to have an injury/illness free work environment for the benefit of its employees, suppliers, customers, and the public. Working safely and in compliance with health and safety rules and procedures, is a condition of your employment at AHG. In this respect, as a AHG employee you must ensure that:

- The work environment is safe by identifying and controlling unsafe conditions and occupational and public safety hazards
- You discuss any additional safety requirements applicable to the work with your supervisor
- You work in conformance with all applicable safety rules, laws, standards and procedures, including those of the Saudi Arabian government, and the relevant customer (but AHG rules must apply as a minimum to all work you undertake)

4.2.3 When operating a vehicle on AHG business, you must ensure that you have a valid driver's license, comply with the state vehicle code, and operate the vehicle safely at all times. In addition, you should help and encourage others to work safely and always place safety at the top of your agenda.

4.2.4 The possession or consumption of alcohol is prohibited by the prevailing laws of the Kingdom of Saudi Arabia. Accordingly, any AHG employee found knowingly to be consuming, selling, or otherwise in possession of alcohol shall be reported immediately to the Saudi Arabian Police Authorities and shall be terminated by AHG. **Never** perform work for AHG while under the influence of alcohol. You may not consume alcohol while working for AHG, including at lunches, or when present on company property. Similarly, you may not operate a AHG-owned, leased, or rented vehicle or piece of equipment after consuming alcohol and you may not transport alcohol in a AHG-owned, leased, or rented vehicle or equipment.

4.2.5 The same rules that apply to alcohol apply also to any form of narcotic or drugs other than those prescribed formally by a licenced doctor or qualified medical



practitioner to treat a medical condition. Where there is even a slight possibility that the drugs may cause effects that impair the ability of the AHG employee to perform their job function safely (eg a machine operator or vehicle driver taking drugs whose side effects may cause drowsiness), it is the responsibility of the AHG employee to inform his line manager before resuming duty whereupon he/she may be temporarily reassigned depending on an assessment (on a case by case basis) of the situation. It is also the responsibility of the employee to ask about the side effects of the drugs (and to check the manufacturer's guidance regarding them) at the time they are prescribed.

- 4.2.6 You must report immediately to your AHG Supervisor and/or business contact all occupational injuries and illnesses, injuries to non-employees, damage to property resulting from AHG's operations and business activities, and any unsafe conditions that you cannot safely correct. **You also can contact AHG's Health and Safety Manager at +966 13 864 2643.**
- 4.2.7 It is critical to AHG that all employees follow its health and safety rules. Unsafe practices will not be tolerated and those who fail to adhere to the rules may be subject to a range disciplinary actions including, in serious cases, termination of employment.

4.3 Environment

- 4.3.1 In addition to complying with applicable laws and environmental regulations, AHG's employees have individual and collective responsibility to look after the environment by considering how to use our resources efficiently in a way that minimises the environmental impact of that use.

4.4 Personal responsibility

- 4.4.1 Every AHG employee is accountable for his or her actions and for meeting both individual and shared goals.

4.5 Use of AHG's tangible assets

- 4.5.1 Each of us will protect AHG's equipment and property from loss, disclosure or misuse and adopt the same standards for customer or third party assets in our care. For all such assets, we must make sure that they are not lost, damaged, misused, or wasted and we must not transfer, sell, lend, or donate them without written authorisation. It follows that equipment should be used only for authorised purposes, maintained regularly, kept physically secure when not used, and that inventory records should be sufficient to track all assets, whether owned by AHG or by third parties.



Illustrative example – home improvements

Hypothetical situation

You have custody of certain AHG tools at the weekend. Can you use them to make certain home improvements?

Answer

No. AHG tools may not be used for personal use. Moreover, they can only be taken from AHG's premises with the requisite authorisation.

4.6 Confidential information

- 4.6.1 Confidential information is any confidential or proprietary information (written, pictorial, or oral) that belongs to, or is the possession of, AHG. It can be financial, relate to specific jobs or customers, to marketing or promotional activities, to technical matters, to customers, suppliers, or employees, to research and development, to trade secrets, or to other proprietary information. It must be shared internally only on a “need to know” basis and with third parties only on a confidential basis and with appropriate authorisation to do so in each case. This applies equally to confidential information belonging to our customers or other third parties. Where those customers or third parties hold our confidential information, they must protect it similarly.
- 4.6.2 If you have any doubts about whether information can be disclosed, always contact your line manager in the first instance **before** any disclosure is made. Confidential information should never be left visible or accessible for others and should be handled with great care (it should never be discussed in public or in situations where third parties might overhear what is being said).
- 4.6.3 Sometimes, material that we receive contains additional restrictions or warnings such as “Classified” or similar terms. Where this is the case, always check with your line manager as to these meanings and follow any additional rules that apply to the handling of information of this class.

Illustrative example – AHG confidential information

Hypothetical situation

You are testing a supplier's new product in circumstances where it has been provided solely to enable you test it and you have signed up to this arrangement. In your view, another supplier with whom you deal should be able to make the same product more cheaply and produce a higher quality item. You propose to send the other supplier details of the new product to see if they can make it more cheaply which will, potentially, save money for AHG and create alternative suppliers of the product which will be good for the market as a whole. Is this ok?

Answer

No. AHG would be in breach of the arrangements it had entered into with the first supplier, this could cause reputational damage for AHG, and it is also a breach of the AHG Code of Conduct.



4.7 Using AHG's information technology (IT) systems

- 4.7.1 AHG's IT systems (here meaning all desktop, laptop and handheld computers and similar devices, blackberries and mobile phones, servers and networks, storage devices, telephones, printers, fax machines, scanners and information which they store and applications that they use) are to be used primarily for business operations. Telephone and computers may be used for limited personal use provided that this limited concession by AHG is not abused by employees and that it does not have any adverse effect on AHG's business.
- 4.7.2 The installation of unauthorised software on AHG's IT systems is prohibited as is the copying of software (unless AHG's licencing agreements permit such copying and it is for business purposes). Likewise, AHG employees must not share their passwords or access credentials with anyone else and should not connect any non-AHG IT equipment to AHG's networks.
- 4.7.3 The use of any social media by AHG employees needs to be managed by AHG employees with great care as such information can sometimes have severe consequences for AHG, its customers and suppliers, and its other employees and may breach an individual's right to privacy.
- 4.7.4 AHG IT systems should **never** be used to access inappropriate websites or otherwise to access, obtain, create, or distribute material that is illegal, offensive, obtained illegally, pornographic, sexist, racist, defamatory, abusive, or in breach of copyright. In addition, AHG employees should not download material from AHG IT systems (whether inappropriate or not) for personal use such as film, movie or video clips. Any AHG employee who receives unsolicited inappropriate material (eg by way of email) on AHG's IT systems (eg a mobile phone or computer) should report the matter to AHG Information Security – the material must not be distributed by the recipient.
- 4.7.5 **All AHG employees should be aware that AHG may monitor use of its IT and communication systems to ensure employee compliance with this Code.** Thus, AHG will have a record of any activity or transaction you undertake using a AHG computer and it is AHG property.
- 4.7.6 Any AHG employee who knows or suspects a security breach of AHG's IT systems should contact AHG's Information Security emergency hotline immediately (+966 13 864 2641 extension 111). If a breach is found to have occurred as a result of a AHG employee's non-compliance with this Code of Conduct, it could lead to a range of further actions including, in serious cases, termination of employment.



Illustrative example – accessing a personal bank account

Hypothetical situation

Using AHG IT, you want to check your bank balance online during your lunch break. Is this permitted?

Answer

Yes. Provided this takes little time, is not a regular practice, and it does not interfere with AHG's on-going business or the performance of your role at AHG

4.8 Personal information

- 4.8.1 AHG will ensure that all personal data is handled appropriately based on applicable data protection laws and regulations.

Illustrative example – provision of personal information

Hypothetical situation

A customer wants details of all AHG workers on a particular job including names, passport details, contact details, next-of-kin and other personal information. Is this permitted?

Answer

Yes, probably. However, double-check with your line manager (or Human Resources as directed) as some countries have very strict rules on the information that can be provided and, whatever AHG provides, it should be from one department (HR) so that AHG's position is consistent from project to project.

4.9 Community involvement and charitable giving

- 4.9.1 AHG will endeavour to make a positive contribution to the local community through support provided to charities or other initiatives deemed worthy of support. It helps raise awareness of AHG in a positive context and also creates a sense of community. The precise nature of the support will be as determined from time to time by AHG's owner, Mr Hani Al Hoty, or by senior management to whom he delegates this task. Community support may only be provided with the prior written authorisation of Mr Hani Al Hoty or, as applicable, his nominee.



4.10 Politics and public policy

4.10.1 AHG's policy is not to make any payments whatsoever that might be regarded as political payments and, in any event, to comply in full with applicable laws and regulations in this regard. AHG employees should **never** use AHG property, time, or resources in relation to any form of personal political activity and likewise must comply with applicable laws and regulations in this regard.

4.11 Record retention

4.11.1 AHG already keeps various project related and other documents for many years both because it is good practice and because, for certain customers, it must do so in order to comply with the terms of the contractual agreements for various projects (among other things, to allow customers with a right to audit the opportunity to reviews the records for their projects as they deem necessary).

4.12 Waivers

4.12.1 Any AHG employee seeking a waiver relating to their compliance with a particular condition in this Code of Conduct must seek dispensation in writing. Such waivers can only be granted by AHG's owners.



5. Raising concerns – a recap

5.1 The importance of communicating genuine concerns

- 5.1.1 In many respects, AHG employees are the “eyes and ears” of AHG senior management and it is thus imperative that they raise issues promptly when concerns are first identified as the standards of conduct described in this Code of Conduct are critical to the on-going success of AHG.
- 5.1.2 If you encounter questionable activities or have any concerns, including but not limited to any concerns related to this Code of Conduct or any accounting or auditing matters or internal controls, we encourage you to bring them to our attention immediately by contacting your AHG line manager, by calling the Hotline (+966 13 898 1684), or by contacting directly AHG’s Executive Vice President (+966 13 864 2641 extension 104) or the Executive Director (+966 13 864 2641, extension 111). Both individuals are available and may be contacted from 7am to 7pm, Saturday to Thursday every week. These outlets provide a safe place to ask compliance and ethics questions or to raise concerns. Calls are handled confidentially to the extent permitted by law and can be made anonymously if callers are uncomfortable about giving their name.
- 5.1.3 AHG prohibits retaliation against anyone who raises concerns in good faith or who is involved in an investigation. If any retaliation is nonetheless suspected to have taken place, the senior management **must** be informed. AHG will investigate any reports of retaliation and take appropriate action. If proven, such retaliation could lead to a range of further actions including, in serious cases, termination of employment.



Appendix 1 – an explanation of how reports to the hotline, or by email, are handled

What happens when you raise a concern?

When you call the confidential hotline, a trained member of AHG staff will take a written account of your concerns and then make a confidential internal report to the Ethics Committee. The calls are not recorded. At the current time, calls can be made only in English. Therefore, if you wish to raise a concern in your native language such as Hindi, Urdu, Tagalog, Sinhalese, or Tamil (languages used by significant elements of AHG's employees):

- You should make an initial call to the hotline requesting to speak to someone who is fluent in your mother tongue (ie your native language)
- During that call, we will agree with you that, at a pre-arranged time, either we will call you back (or you will call the hotline again) by which time we will have arranged for you to speak to one of our trusted personnel who can speak to you in your mother tongue
- Alternatively, you can write details of your concerns in your mother tongue and send them by email to Questions@al-hoty.com (see below, the email equivalent of the hotline)

You do not have to provide your name when making the call but this can make it more difficult to investigate concerns. It also makes it more difficult for AHG to contact you subsequently for further information or to provide an update.

In terms of providing you with updates, AHG will give you a reference number when you first telephone the hotline and you can use this number when calling the helpline again. While AHG will endeavour to inform you when the matter has been resolved, it may be unable otherwise to provide details of its findings because of privacy/confidentiality issues.

You do not have to be convinced that there is a genuine issue when you call the hotline so long as the call is made in good faith and you believe that there has been a breach of laws or of the Code of Conduct. If it transpires that the issue you reported was not in fact a breach of these laws or rules or was otherwise not an issue of concern, you will not be punished or otherwise suffer or be penalised. Anyone who nonetheless attempts to penalise you will be subject to disciplinary action. **For the avoidance of doubt, the hotline and associated email address have not been put in place for the purposes of handling grievances relating to an employee's terms of employment, they should be raised with AHG's HR department.**

Making a malicious call or knowingly supplying false information will be regarded as serious misconduct and subject to disciplinary action.

While the hotline is primarily for AHG employees, anyone who has a potential concern about breach of laws or policy can also use it to raise these concerns.



In many respects, the approach adopted for concerns raised by way of email to Questions@al-hoty.com is the same as that described above for calls to the hotline. The main difference is that it is easier to contact you for further information and copy documents when complaints are made by email. As in the case of calls to the hotline, emails from persons who prefer to remain anonymous are allowed but we would much prefer it if persons identified themselves for reasons already given.

What is the process at AHG for handling concerns that are made?

AHG has formed an Ethics Committee to which written summaries of your concerns will be passed for consideration (including the original emails where contact was made through an email to Questions@al-hoty.com).

There will always be five members of the Ethics Committee each of whom will be members of AHG's senior management selected personally by the Owner. Initially, the five members will be:

- Anwar H. Khan (Deputy General Manager, Al Hoty Stanger Limited Company (Independent Laboratories and Materials Testing))
- Ibrahim Al Ghunaim (Deputy General Manager, Al Hoty Company Limited)
- Mr. Wendell Arevalo (Deputy General Manager, Al Hoty Company Limited)
- Abdu Amin (Administration Manager, Al Hoty Stanger Limited Company (Independent Laboratories and Materials Testing))
- Mohammad Imran Shahid (Quality Manager, Al Hoty Stanger Limited Company (Independent Laboratories and Materials Testing))

Thereafter, the names of the Committee members may change from time to time and such changes will be communicated to AHG employees. In the event that, in relation to a particular matter, the concern being raised relates to one of the Committee's members or a department controlled directly by them, that person will recuse themselves from discussion of that matter and, for that matter, will be replaced on the Committee by Mr. Ed Abella Admin Officer (with the members choosing a new Chairman as well if it is the Chairman who recuses himself). Mr Ed Abella will also replace a member on the Committee if that person is ill or otherwise unable to attend a particular Committee meeting. If more than one member of the Committee cannot consider a matter because the issue relates to them as described above, the Committee Chairman will seek instructions from the Owner who will determine the members of the Committee to consider the particular matter.



With regard to each issue referred to the hotline or the email equivalent (Questions@al-hoty.com), the Committee will determine how best to handle it as follows:

- Does it relate to a matter within AHG's control? If not, contact the reporter accordingly with advice as to whom/which body they should contact.
- Does it relate to an HR grievance or salary issue? If so, direct the reporter to the relevant AHG Department (eg the HR Department)
- Does it relate to a matter requiring further investigation? If so, appoint an internal or external investigator (reminding either of the confidential nature of the matter)

If an investigation is required, the investigator will produce a plan to be endorsed by the Committee that covers the approach in light of the allegations/matters raised by the reporter. The plan will address the following:

- What is being alleged and is it still going on?
- What are the facts that need to be established in relation to the allegations?
- Depending on the seriousness of the matter, how will witnesses be handled (ie informal interviews, formal interviews, signed summary statements, recorded interviews)?
- How will the inquiry be handled?
- What resources are required?

At the outset of the investigation, the reporter should be informed of the appointment of an investigator and requested to provide any additional information and explanations that they might possess (ideally by way of a confidential meeting with the investigator, most probably off site).

This investigator will make contemporaneous notes as the investigation progresses, secure evidence gathered, leave original documents untouched (working from copies where necessary), and do their best to protect the identity of the reporter/whistleblower. If the whistleblower believes that their identity has become known, he/she should inform the investigator who in turn will seek guidance from the Committee as regards any additional steps required to protect the welfare of the reporter/whistleblower. In rare cases, a reporter/whistleblower or employee may request that they have legal representation at interview. This matter should be reported to the Committee for guidance but, generally, this should be permitted albeit that the lawyer should be a silent observer at any interview.



The investigator should collate information as quickly as possible and otherwise preserve/secure other information or evidence. He/she must be objective and impartial when gathering evidence, forming views, and interviewing witnesses. On completion of his/her investigation, he should report to the Committee with findings and recommendations whereupon the Committee will decide on an appropriate course of action which may include any of the following:

- No further action required
- Further investigation required
- Further action limited to changes in AHG's controls or procedures
- - Disciplinary action against one or more individuals, up to and including termination in serious cases
- Civil action
- Reporting of matters to the criminal authorities

Once the Committee has decided upon the matter, the whistleblower/reporter should be informed that investigations have finished using whatever mechanism the Committee deems most appropriate (eg via the investigator). The Committee will also determine the extent to which additional information about the results of the investigation can be provided to the whistleblower/reporter.

Finally, the file should be closed and records preserved and the Owner should be informed of the matter and the conclusions. For urgent or serious matters, the Committee should inform the Owner immediately that the matter is raised by a reporter and also seek the Owner's approval of the planned investigation, the results of the investigation, and the actions recommended as a result of the investigation.

If disciplinary action is required, how does AHG handle this?

Should any notification by a whistleblower/reporter result in the requirement for AHG to take disciplinary action against one or more employees, it will do so in accordance with existing policy and procedures. By way of a reminder to employees, those procedures are summarised below.

Unfortunately, from time to time AHG may face situations where some employees do not satisfy its mission, values or standards of professionalism or otherwise fail to comply with the terms of their employment contract, this Code of Conduct, or applicable laws of the Kingdom of Saudi Arabia. Sometimes this situation applies from the beginning of the relationship but in some other situations it can be at later stages as the nature of AHG's business changes.



It may, for example, be triggered by facts gathered by AHG by virtue of a report made to its ethics hotline described elsewhere in this Code of Conduct. AHG always considers each case on its merits based on the facts but there are some factors which can be indicative of a mismatch between AHG's values and those of an employee such as where the employee:

- Is openly disrespectful to fellow employees, whether orally or in writing, and the employee's behaviour does not improve even after AHG issues that employee with a warning
- Regularly displays a critical, negative, confrontational or highly defensive attitude when dealing with other employees
- Is insubordinate or otherwise openly disrespectful of authority
- For other reasons, may represent a threat to AHG's reputation (eg through poor performance)

In such situations, it is often the case that continuing the employment relationship is in the interests of neither AHG nor the employee.

Employees are required to follow and comply with all the policies and procedures of AHG and any statutory provisions that are required in the day-to-day performance of their duties. It is impracticable to describe every possible response to a breach of conduct. However, a failure to comply with AHG's policies and statutory requirements can, in certain circumstances, be regarded as gross misconduct⁽⁶⁾ which may result in summary dismissal. That said, AHG always judges each case on its merits and the seriousness of a particular failure to comply with its policies and procedures will be a determining factor in relation to the nature of any disciplinary action.

AHG believes that its procedures for dealing with breaches of its policies are fair and reasonable. Employees will be given an opportunity to explain their case and AHG will endeavour to ensure that each case is dealt with in a consistent manner. In addition, the employee's conduct and performance to date will of course be taken into consideration.



Suspension from work	If a breach constituting gross misconduct is suspected, the employee may be suspended from work for up to one week (at the discretion of AHG, on full pay) until the alleged breach is fully investigated
Minor breaches of policy	These will be handled will be handled by the employee's line manager
Other breaches	The employee will be required to attend a disciplinary meeting with their line manager before the same Committee that also handles whistleblower/ethics reports (see above). The employee will be given prior notice of the nature of the meeting, the relevant allegations will be put to the employee at the meeting, and the employee will have a chance to respond and, with prior approval of the Committee, to support their position by way of evidence from witnesses in a manner that the Committee deems appropriate.

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Employee conduct so bad that the employee's relationship with AHG is damaged beyond repair and justifies AHG in immediately dismissing the employee without notice or pay in lieu of notice, subject always to the overriding provisions of the applicable laws of the Kingdom of Saudi Arabia



	<p>The aim of the meeting will be to establish the relevant facts, investigate all possible information, and consider any mitigating circumstances. If necessary, the meeting may need to be postponed or re-scheduled to give time to explore any presented evidence. Minutes from the meeting will be taken by a secretary to the Committee appointed for the purposes of the meeting and signed by everyone present. The employee will be provided with a copy of the minutes and another copy will be placed in the employee's personnel file. If a satisfactory explanation of the breach of policy does not result, and based on the evidence, the Committee will make a decision as to the appropriate disciplinary action. The Committee will aim to reach its decision on disciplinary action within 30 days.</p>
Levels of disciplinary action:	
Special counselling and/or warning	<p>Minor breaches will be discussed during a meeting between employee and line manager who will agree on the circumstances, the impacts and possible consequences, and the corrective actions and deadlines.</p> <p>In some situations, the AHG line manager may give a verbal warning for minor breaches and a note of the warning will be made and placed in the employee's personnel file.</p>
First written warning	<p>The next step on the disciplinary ladder is the issuing of a first written warning to the employee. This will be given either to an employee who has had multiple verbal warnings within six months, or after a first breach of conduct that is considered to be of sufficient seriousness to merit more than a verbal warning. This would be handled through the committee related process described above (ie minute taken and written warning placed on the employee's personnel file). The written warning/letter will contain details of the corrective actions and how they will be monitored.</p>
Second written warning	<p>Following the first written warning, the next stage of disciplinary proceedings is the issuing of a second written warning to the employee. This will be given to an employee who has received a first written warning within twelve months (whether related or unrelated to the conduct that was the subject of the first written warning). Again the matter will be handled by the same committee referred to above with the same procedures applying as for the first written warning.</p>
Final written warning	<p>A final warning will follow either conduct which warrants a further warning within 12 months of a second written warning, or following serious misconduct. Once again, the Committee will handle the matter in the manner described above. Failure in completing corrective actions within the specified timeframe will lead to the employee's dismissal.</p>



Appendix 2 – a suggested approach for reports that are made in writing

When raising concerns in writing, please follow these general guidelines:

1. Do not assume that the reader has any prior knowledge of the matter, start from the beginning and explain the backdrop
2. Try to avoid using abbreviations
3. As far as is possible, give specific names of individuals, dates, times, and other information
4. Explain clearly what you think has happened and why it is wrong, whether the matter giving rise to the concern is continuing, and for how long it has been going on
5. Where possible, provide copy documentation in support of your concern
6. Where you wish to make a number of points/allegations, describe each of them separately along with the supporting evidence that you have, if any



Appendix 3 – general and management declarations of AHG employees

Regularly, as AHG sees fit, all employees will be required to confirm that they have attended various training sessions including training on AHG’s Code of Conduct by signing of a form in the format described below:

AL HOTY GROUP
EMPLOYEES’ ORIENTATION & INDUCTION REQUEST FOR CONFIRMATION

Company: _____

Date of induction: _____ Location of induction training: _____

S.N	Name of Employee	ID No.	Designation	Attendee’s Signature

AL HOTY’S OFFICER:

Check Items Discussed:

- Purpose of Orientation
- Al Hoty Group’s Code of Conduct
- Workers’ Safety Behaviour
- Reporting (Vehicle, Injury, Near Misses) accidents to Supervisor / HSE Representatives
- Basic information of STARRT Card and JHA
 - STARRT Form
 - How to make JHA
 -
- Site Safety Rules
 - Excavation and Trenching
 - Operators and Drivers Responsibility
 - Housekeeping
 - Mandatory PPE at Site
- Fire Prevention
- Heat Stress
- Environmental Awareness Training



AL HOTY GROUP

EMPLOYEES' ORIENTATION & INDUCTION REQUEST FOR CONFIRMATION

Name : _____

Company Name : _____

Company ID : _____

Designation : _____

My language requirements are: : _____

I confirm that I have attended and fully understood the contents of Al Hoty Group's Orientation / Induction which was delivered in a language that I speak and understand.

The Information and Requirements delivered were:

- An overview of Al Hoty Group's Code of Conduct
- An overview of Al Hoty Group's Environmental, Safety and Health Requirements
- An overview of Al Hoty Group's Project Site Rules

I fully understand that non-compliance with any of the above may result in disciplinary action, up to and including termination.

Signature : _____

Date : _____

To Be Completed by Al Hoty Group

Al Hoty Group's Facilitator : _____

Al Hoty Group's HS&E Manager : _____

Al Hoty Group's Project Manager : _____



AHG employees at the level of manager and above will be required henceforth to sign an annual declaration in the format described below:

“Annual senior AHG employee ethics declaration – year ended 31 December 20xx

As a AHG employee, I hereby confirm that in the year ended 31 December 20xx (or from the date of my joining AHG where this was later than 1 January 20xx):

- 1. I complied at all times with the provisions of AHG’s Code of Conduct.
- 2. For the avoidance of doubt and except as noted below [RECORD ANY EXCEPTIONS IN THE SPACE PROVIDED], neither I nor my close family members had any business dealings with AHG, whether directly or indirectly (eg through an interest in a business that trades with AHG). I also confirm that I otherwise had no conflicts of interests (see section 1.70 of the Code of Conduct).

- 3. Excluding AHG, a full list of the businesses in which I have (or have had, during the year) any interest as owner/investor, manager, or employee, directly or indirectly (excluding any interest of less than 5% in a listed company), is shown below [LEAVE THE BOX BLANK IF YOU HAVE NO OTHER BUSINESS INTERESTS]

- 4. To the extent that I became aware of potential breaches of laws or the provisions of the Code of Conduct by others, I have in each case reported the matter internally as required by the Code of Conduct. As at the date of my signing this declaration, I am likewise not aware of any breaches by others of the Code of Conduct except as reported below [RECORD ANY EXCEPTIONS]

[FULL NAME OF AHG EMPLOYEE]

[AHG EMPLOYEE NUMBER]

[Signature]

[Date]