



Business Conduct Guidelines

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Chairman's Message

To Our Customers, Our Partners, and Our Employees.

Since 1936, Juffali has been an active and passionate contributor to the Kingdom of Saudi Arabia's growth and prosperity. Built on a tradition of service and quality, with the vision of bringing new ideas, products, and services to the Kingdom, we have helped to lay the foundation for our nation. Today, we've become the trusted and dependable partner that international brands look to for bringing their business to the region.

In light of Saudi Vision 2030, our spirit of advancement is more relevant than ever before. In addition to the work, we do with our partners, our training center takes an active role in developing the skills of our future thinkers and builders. By helping to build a vibrant, thriving economy in the Kingdom, we continue to bring in whatever the region needs to move forward. Whether it's embracing the localization of manufacturing in Saudi or the most inspiring innovations in technology, we always partner with the extraordinary to deliver. But even more than who and what we bring together, it's how we do it - since the beginning, we discover spaces to grow businesses and amplify individual ideas. Together with our people and partners, we create opportunities to advance our collective future, confident when to question and push ahead yet humble enough to challenge thoughtfully.

Our legacy provides us with a powerful springboard, but it's our drive that invites us to go further, to stay attuned to the now, and to build what's next. As we enter this promising new era for our Kingdom, our philosophy of people, quality and service is as true today as it was in the past. This, combined with our pioneering spirit, will help us to propel our people, our partners, and the nation forward. On behalf of our stakeholders, I wish to extend thanks to our customers, partners, and employees, for their support and confidence, and look forward to a bright future for us all.

Every Juffali employee, regardless of location or position in the Company, has an obligation toward the Juffali and should understand it's Business Conduct Guideline and follow it every day, without exception. Everyone who works at or with Juffali should feel confident about our high ethical standards, our honesty, and our integrity. That starts and ends with each one of us.

K. Juffali

Khaled Juffali
Chairman of Juffali

CEO Message



Over the years, Juffali has been instituting compliance/ethical management principles worthy of a business growing on trust from customers and society, as part of the long-running effort.

As compliance and ethical management hinges on willing compliance on the part of all employees, we also have been implementing diverse efforts to increase employee awareness of the importance of compliance.

All of us pledge that we will continue to fulfill our ethical and social responsibilities not only for customers, shareholders, and other stakeholders but also for the protection of the environment, as well as to grow into a lasting company people trust and love around the world.

Ali Dulaim
CEO

CFO Message



Our Business Conduct Guidelines provides a set of guiding principles for everyone who works in Juffali. It contains our legal and ethical obligations at work. It also reflects our commitment towards improving our internal controls, policies and procedures in the Juffali Group.

Faisal Charara
CFO

Legal and Compliance Team Message



Shadi Al-Daoud
General Counsel and Chief
Compliance Officer



Saad K. Khalil
Compliance Officer

Dear Team,

At the heart of our success lies our commitment to integrity, respect, and fairness.

Our Business Conduct Guidelines serves as a guiding light, ensuring that we conduct ourselves with the utmost ethical standards in all aspects of our work. Compliance with all applicable laws and regulations is paramount, and it is our shared responsibility to maintain a safe and inclusive environment that fosters trust and collaboration.

By upholding our Business Conduct Guidelines, we create an atmosphere of excellence where every team member feels valued and empowered. Let's continue to prioritize ethical behavior and ensure our collective success.



Read and Understand the Business Conduct Guidelines:

- Our Business Conduct Guidelines apply to all employees, directors, officers, and third parties representing Juffali Company and its wholly-owned affiliates.
- Gain a solid understanding of the policies in our Business Conduct Guidelines.
- Learn the details of the Business Conduct Guidelines policies that are relevant to your specific job, as well as policies and procedures that support the Business Conduct Guidelines policies.
- Complete the compliance training assigned to you in a timely manner.

Comply with the Business Conduct Guidelines (both the letter and spirit) in everything you do:

- Lead by example – create and maintain a culture of compliance and personally lead compliance efforts.
- Consider compliance performance when hiring, evaluating, and rewarding employees.
- Build an infrastructure to prevent, detect, and respond to compliance issues.
- Identify business compliance risks and build processes to prevent and manage those risks.
- Promptly raise and address compliance concerns that arise.
- Consult with the General Counsel and Compliance officer when requested to cooperate in any disclosures to law enforcement authorities and regulators.

Report compliance concerns promptly:

- Speak up - the sooner concerns are addressed, the better.
- Understand the many channels available for reporting compliance concerns.
- Cooperate in investigations into compliance concerns or violations.
- Do not take any retaliatory actions against any person for reporting a concern.

Who is Covered by Our Business Conduct Guidelines

Our Business Conduct Guidelines applies to all associates of Juffali and its subsidiaries. It also applies to Juffali and its subsidiaries board members when they are acting in their capacity as our directors. Our Business Conduct Guidelines is translated into multiple languages so that our associates can easily understand it (Arabic, English).

In the event of changes in the applicable law that might affect the Business Conduct Guidelines, Juffali may modify the content in accordance with the applicable law. We expect our suppliers, vendors, service providers, and other business partners to act with integrity and honor our values.

Associates who violate our Business Conduct Guidelines may be subject to disciplinary actions, up to and including termination.

In rare cases, it might be appropriate to waive a part of our Business Conduct Guidelines. To request a waiver, contact the General Counsel and Compliance Officer in advance of the activity for which you want the waiver.

Our Ethical Principles

- We are honest.
- We Comply with laws and ethical standards.
- We respect the customers, shareholders, and employees.
- We protect the health, occupational safety, and personal security of our people.
- We engage with reputable and law-abiding partners.
- We take Ownership.
- We are committed towards our environment.

Our Method



Make Ethical Decisions

We build trust when we make decisions consistent with our values and take responsibility for our actions. Being ethical means doing the right thing even when no one's watching.

Compliance with Laws and Regulations

Juffali business activities are subject to extensive governmental regulation and oversight, and it is critical that Juffali and its employees comply with applicable laws, rules, and regulations.

Integrity in the Workplace

Personal behavior:

Juffali is committed to the highest standards of ethical business conduct and thus has a high expectation for its employee to have the same standards of honesty, integrity, and respect for co-workers, customers, partners, and any party that an employee conducts business with on behalf of the company. Juffali seeks to provide an inclusive, positive environment and a welcoming workplace for its employees who value their talents and contributions to the business.

What should you do?

- Be honest, faithful, and in compliance with the company's internal policies, regulations, and ethical standards when conducting your duties and dealing with others on behalf of the Group.
- Treat your colleagues with mutual respect, share knowledge and experience, and never undermine colleagues directly or indirectly.
- Contribute to the company's mission and vision by understanding Juffali's goals and strategies and proactively supporting them and exercising the highest level of professional and ethical behavior.
- The Company's good name is in your hand, so treat customers, suppliers, and consumers with the utmost integrity and make sure your actions always reflect our values.



Human Rights, Anti-Discrimination, and Harassment:

Juffali's respect for human rights is one of the company's fundamental values. We strive to respect, protect, and promote human rights. Juffali is an equal-opportunity employer and bases employment decisions on qualifications, experience, skills, and potential. Employment decisions are made without regard to race, gender, age, religion, nationality, or origin. Juffali is committed to fair employment practices and abides by local employment laws & regulations.

Juffali maintains a work environment that is free from discrimination, harassment, and/or retaliation. Juffali does not tolerate harassing conduct that may interfere with an individual's work performance or creates an intimidating, hostile, or offensive work environment.

Behavior which Complies with Law

Observing the law and the legal system in every sector where we do business is a fundamental principle for Juffali. All employees must obey the laws and regulations of the legal system within which they are operating in addition to applicable Juffali policies. Violations of the law must be avoided under all circumstances.

Regardless of the sanctions that could be imposed by law, all employees guilty of a violation will be subject to disciplinary consequences because of the violation of their employment duties.

Management, Responsibility, and Supervision

The culture of integrity and compliance in an organization starts at the top. All managers must fulfill their duties of organization and supervision. All managers bear responsibility for all employees entrusted to them. All managers must earn respect through exemplary personal behavior, performance, openness, and social competence. This means, among other things, that each manager must emphasize the importance of ethical conduct and compliance, make them regular topics of everyday business, and promote them through personal leadership and training. Each manager must also set clear, ambitious, and realistic goals and lead by example.

Managers should permit their employees as much individual responsibility and leeway as possible, while making it clear that compliance is required under all circumstances, always. All managers shall also be accessible in case employees wish to raise compliance concerns, ask questions, or discuss a professional or personal problem.

These responsibilities of managers do not relieve employees of their own responsibilities. We must all work together to comply with applicable laws and Juffali policies. These specific manager responsibilities are listed here to give employees an idea of the leadership and support they should expect from their superiors.

It is the responsibility of all managers to see to it that there are no violations of laws within their area of responsibility that proper supervision could have prevented. They remain responsible, even if they delegate tasks. In particular, the following duties apply to managers:

- The manager must carefully select employees based on their personal and professional qualifications and suitability. The duty of due care increases with the significance of the task the employee must perform (duty of selection).
- The manager must give precise, complete, and binding instructions to employees, especially regarding compliance with the law (duty to give instructions).
- The manager must ensure that compliance with the law is continuously monitored (duty of monitoring).
- The manager must clearly communicate to employees the importance of integrity and compliance in everyday business. He/she must also communicate that violations of the law are unacceptable and will have employment consequences (duty of communication).

Regulatory Environment





Anti-Corruption

Corruption and bribery are illegal everywhere in the world and can impede economic growth and stability. Juffali is committed to ensuring that all its business dealings – in both the public and private sectors – are based on lawful, ethical, and fair practices.

We prohibit giving, receiving, or assisting with any form of bribery, including facilitation payments. All Business Gifts and Hospitality must be exchanged in an open and honest manner that does not create an improper business advantage. These restrictions also apply to the actions of third parties – such as contractors, consultants, and agents – taken on our behalf or for our benefit.

These standards are intended to protect Juffali and avoid exposing us and our employees to reputational, financial, and other penalties, including imprisonment.



Anti-Bribery



Juffali doesn't bribe or accept bribes or kickbacks. To ensure we make business decisions based on objective criteria and to avoid violating laws prohibiting bribery and corruption:

Never offer or provide bribes or kickbacks in any form.

Never request or accept a bribe or kickback.

Be especially careful when interacting with government officials, which include employees of state-owned enterprises. Anything of value can be considered a bribe, not just cash or expensive gifts. For example, making contributions to government officials' favored charities or employing their relatives may violate the law under certain circumstances.

Use agents and others acting on our behalf only after they have been approved under all applicable Company policies and procedures. Do not use a third party to do what the Company could not lawfully do itself.

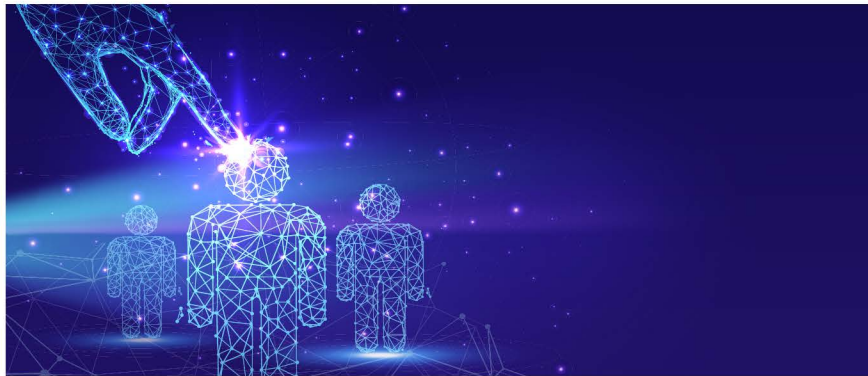
Report any request for, or offer of, a bribe or kickback. Follow all applicable Juffali policies and procedures.



Conflicts of Interest

Employees should always act in the best interest of their company. Therefore, a conflict of interest exists if the interests of an individual or of his/her close personal relations diverge from those of the company to which the individual belongs.

Conflicts of interest can hinder the success of a company, lead to economic damages, and tarnish the company's reputation if they become public, for instance, if the conflict of interest leads to uneconomical decisions, if customers get lost because they lose confidence in the integrity of the company or if restricted information is disclosed as a result. In some cases, conflicts of interest might also bear corruption or antitrust risks. Accordingly, employees should have no relationship, financial or otherwise, with anyone that conflicts or appears to conflict with the employee's obligation to act in the best interest of their company. Therefore, it should be our common goal to avoid situations of conflicts of interest and to create awareness for such situations.



Juffali partners undertake:

- To make business decisions in the best interest of the company and not based on personal interests.
- To anticipate and avoid situations in which the appearance of a conflict of interest may arise.
- To avoid engaging companies with which personal interest exists if it could personally benefit the partner.
- To inform Juffali of any personal interest that might exist in connection with the business relationship.
- To establish measures that prevent conflict of interests.
- To avoid their employees using their position to offer gifts, invitations, or other advantages to Juffali employees or other third parties. This does not apply to occasional gifts of purely symbolic value or meals or entertainment of appropriate value.



Competition Laws (Antitrust)

Competition laws, sometimes also known as antitrust laws, affect every aspect of doing business in today's regional and global markets. These laws are complex, global in reach, and may result in different outcomes depending on the situation. Our policy is to comply with competition laws in everything that we do, to be knowledgeable enough to avoid any violation of competition laws proactively, and to seek and follow the guidance of the company's general legal and compliance officer to ensure compliance. Remember that non-compliance with competition laws can severely harm our business interests and reputation. It can expose the Company to large fines imposed by the relevant authorities, as well as claims from our customers and suppliers. It can also expose individual employees to personal liability, including potential criminal sanctions.

The discussion below describes some of the key requirements of competition laws. Every person who conducts business for Juffali is responsible for understanding how competition laws apply to his or her activities and for seeking specific assistance from the General Counsel and Compliance Officer whenever necessary.

All employees MUST:

- Understand the application of competition laws to what we do every day. For example, competition laws:
- Prohibit agreements or understandings between competitors that undermine competition.
- All business planning and decision-making must be carried out independently, in view of the needs of our business, and without communication or coordination with competitors. Extra care should be taken with activities where competitors are present, such as industry shows, trade associations, and standard-setting bodies.

The following topics (and related data) should not be discussed or shared with competitors:



- Prior to undertaking any activity with Industry Groups involving the aggregation of Industry data, consult with the General Counsel and Compliance Officer to ensure compliance with applicable Competition Laws.
- Regulate the behavior of companies acting by themselves or with customers. It is possible to violate competition laws through unilateral action or through understanding with customers.
- Govern mergers, acquisitions, and joint ventures. Competition laws also require many proposed business combinations and joint ventures to be reviewed by government agencies before completion to ensure that they will not substantially reduce competition. These reviews often focus on internal documents to determine the objectives of the companies involved. Our business plans, market analyses, and business development proposals should always reflect our desire to grow by serving new market segments and finding new ways to serve our customers, not by seeking to reduce competition. Joint venture activities and communications should be limited to accomplishing the approved objectives of the venture.
- Build competition law compliance into our business procedures. Every process that touches customers, suppliers, or competitors should be designed in a way that complies with competition laws. We must adhere to Juffali guidelines regarding contacts with competitors, obtaining and handling competitive information, and participating in trade and professional associations. In designing any new commercial process, involve the General Counsel early.

Report any apparent non-compliance with competition laws, whether by an employee, contractor, or competitor's employee, to the General Counsel and Compliance Officer immediately. If a competitor approaches you to propose an improper agreement, actively declines to take part, breaking off communications altogether, if necessary, and promptly report the approach verbally to the General Counsel and Compliance Officer.

- Consult with the General Counsel and Compliance Officer whenever you have a question or concern or are unsure about the application of competition laws to your activities. Keep up to date through online and face-to-face training opportunities in this area.
- As a market leader, Juffali doesn't follow any inherited practices by the market. Juffali will always lead by example by implementing fair practices driven by their local and international business experience and applicable laws and regulations.



Gift and Hospitality

In our cultures, gifts, and invitations to entertainment events are important for developing and deepening business relationships. However, some gifts and invitations may unreasonably influence the recipient's decision-making or create the appearance of improper influence.

Gifts, hospitality, and other benefits must always be in accordance with applicable laws and regulations. In any case, they must:

- Be transparent and correctly recorded in the company's books and records.
- Be appropriate in terms of type, value, and frequency to the occasion and the position of the recipient.
- Not be offered, provided, demanded, or accepted with the expectation of any type of advantage.
- Never give the appearance of dishonesty or inappropriateness.
- Counterparts, especially public officials, often have their own internal rules that restrict their ability to accept gifts and hospitality. These rules can be very strict and must be followed.





Money Laundering

Money laundering is the process by which persons or groups try to conceal or disguise the true origin of funds obtained illegally. The aim is to make it seem as though they are from a legal source, to legitimize funds derived from criminal or illegal activities.

You should always ensure that you are conducting business with reputable customers, for legitimate business purposes, with legitimate funds.

If you suspect your customer or supplier is engaged in an illegal activity, report it to the General Counsel and Compliance Officer. We comply with all laws that prohibit money laundering or financing for illegal or illegitimate purposes.



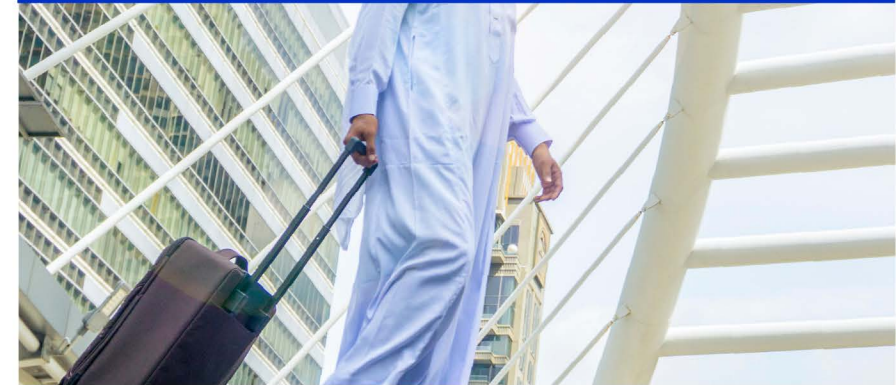
You should check for “red flags” such as requests from a potential customer or supplier for cash payments or other unusual payment terms. If you suspect money laundering activities, inform us and report it to the Legal and Compliance Department.



Travel Expenses

Juffali may be required to pay third-party travel expenses for certain business transactions. However, excessive reimbursement may inappropriately influence the recipient or at least create the appearance of influence.

Therefore, travel expenses must be reasonable and allowable.



Charitable Contributions and Event Sponsorship

Juffali is aware of the potential for charitable contributions, commercial agency arrangements, and events that could be used as a cover for bribery.

We exercise diligence and caution when receiving funds, goods, or services from external parties related to charitable donations or event sponsorships. Any donations or sponsorships are to be made in the name of the Company and not in the name of an individual. We do not accept any donations or sponsorships during a bid process.



Third-Party Business Dealings

Our third-party business dealings, whether with customers, suppliers, distributors, or agents, must be based on lawful, ethical, and fair practices. We must never offer anything of value to obtain an improper advantage in selling our products or services, conducting business transactions, or representing our interests. In our supplier relationships, we must do business only with those suppliers that comply with applicable laws, including employment, environmental, and health and safety laws. The integrity of our third-party dealings is fundamental to building and preserving the reputation of Juffali and its people. Conversely, unethical third-party dealings can seriously damage our reputation.

Always Remember:

Follow applicable laws and our policies and require any supplier or third party who works with Juffali to comply with applicable laws and our policies. Consult the General Counsel and Compliance Officer for the appropriate language to use in all contracts with suppliers and third parties. Follow an “eyes wide open” policy and ensure that appropriate due diligence procedures are followed when selecting suppliers or third parties (i.e., distributors and sales representatives) to represent us. Ensure that we have completed an appropriate verification (“know your counterpart”) assessment before transacting business with a new customer. Follow Juffali’s anti-corruption policy and never give, offer, or authorize, directly or indirectly, anything of value (money, goods, or services) to a third party to obtain an improper advantage.



Whenever possible, utilize competitive bidding to give suppliers an opportunity to earn a share of our purchasing volume, including qualified small and disadvantaged businesses. In certain circumstances, government regulations will apply to the procurement bidding process.



Confidentiality and Data Protection

An increasing number of countries regulate the collection, use, and disclosure of “personal data” (e.g., name, home, and office contact information, financial records, and national identifying numbers). Some countries even regulate information pertaining to corporations. Juffali is committed to handling personal data responsibly to earn and preserve the trust of our employees and business partners. Each employee must exercise care to protect personal data from unauthorized and unlawful collection, use, and disclosure.



Always Remember:

Learn and comply with the data privacy laws and regulations that govern personal data in the country where the data is collected, processed, and used, as well as Juffali applicable guidelines.

Collect, process, and use personal data only for legitimate business purposes. Before you establish or update any system or process that collects, uses, discloses, or transmits personal data, ensure it will comply with all applicable personal data requirements “Data Protection Law”. If unsure, seek guidance from the General Counsel and Compliance Officer. Use “anonymous” and “aggregated” data where possible. Anonymous and/or aggregated data

should be used where the risk of transferring personal data is high, the need for personal data is low, and you can readily aggregate the data or make it anonymous.

Limit access to personal data to those who need it for legitimate business purposes. Use care to prevent unauthorized access in processing personal data and the accidental loss or destruction of personal data. Notify your manager, General Counsel, or Compliance Officer if you learn that personal data has been used in violation of this policy or if you learn that the security of any system containing personal data has been compromised.



Concerns to Look Out For:

Any background information about a **customer, supplier, distributor, or agent** that indicates the possibility of improper business practices or family or other relationships that could improperly influence decision-making.

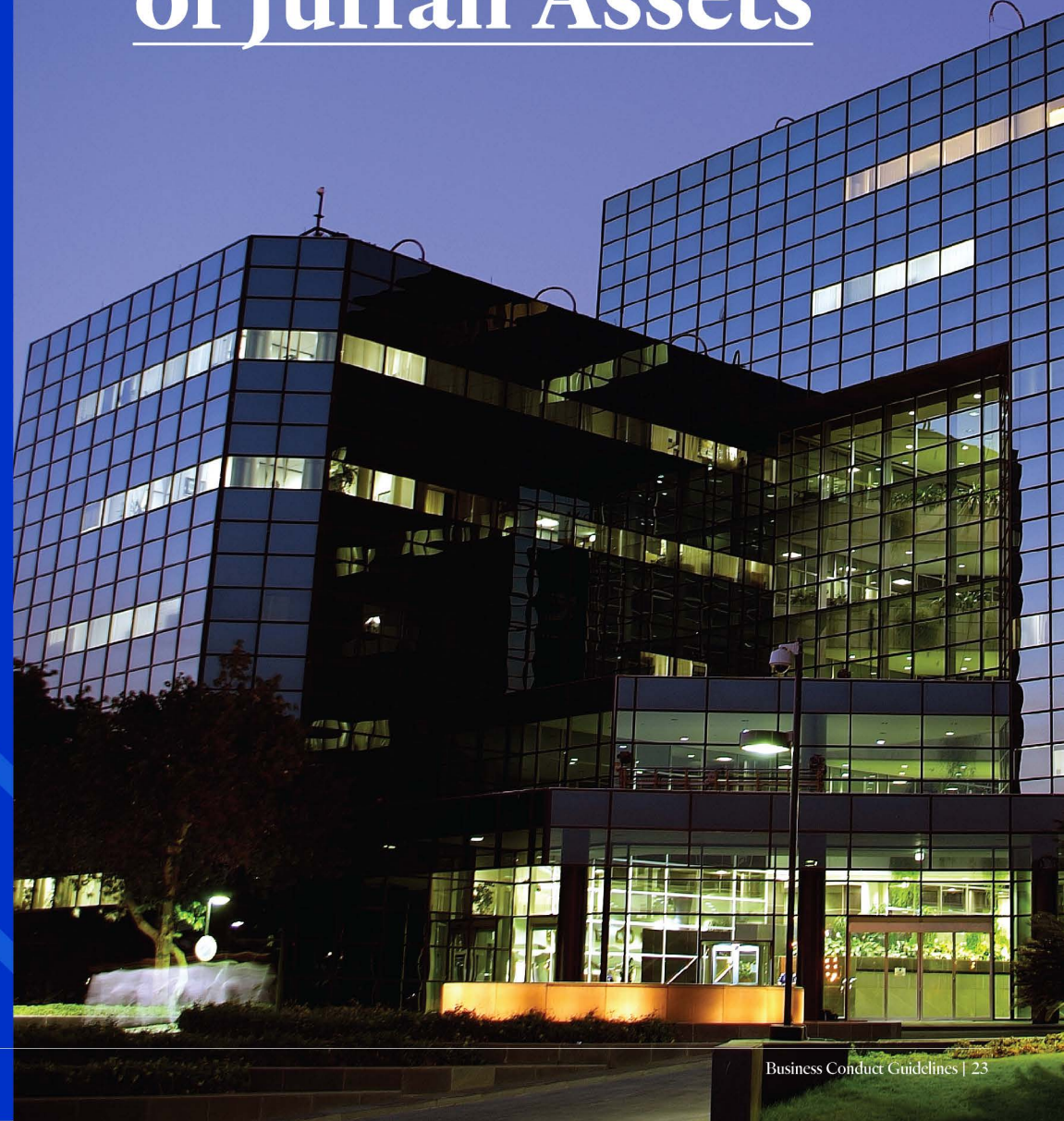
Any request to document a transaction with a third party in a way that does not accurately reflect the **economic realities of the transaction** or have a legitimate business justification.

Any request to pay a **commission prior to obtaining business**.

Selection of suppliers on grounds other than open competitive bidding where competitive bidding would be the appropriate process of selection.

Potential conflicts of interest in third-party selection or directing business to a third party **owned or managed by a close relative or a good friend**.

Protection and Proper Use of Juffali Assets



Company assets and the assets of others entrusted to the Company will be protected against loss, misuse, and/or abuse. The use of material or facilities for purposes not directly related to Company business or the removal or borrowing of company property without permission is strictly prohibited. All Managers should establish appropriate internal control all over the areas of their responsibility to ensure the safeguarding of Juffali assets and the accuracy of financial records and reports.



Copyrights, trademarks, marketing laws, and license agreements will be followed and adhered to when the employees use computer software and printed publications.

1. Juffali Proprietary Information

Proprietary information includes intellectual property such as trade secrets, patents, trademarks & copyrights, as well as business, marketing, and service plans, databases, records, salary information, and any unpublished financial data and reports. The unauthorized use or distribution of this information is a violation of the Company Business Conduct Guideline. It could also be illegal and may result in civil or criminal penalties. Each employee must take prior internal approval before discussing proprietary information with a third party or permitting third parties to use Company proprietary information. Each employee of Juffali shall comply with the rules and instructions contained in the company's issued identity directory and apply them in all internal and external communications of the company.

2. Juffali Equipment

The company can hold employees responsible for misusing its property. The Company funds, equipment, and other physical assets are not to be requisitioned for personal use. If an employee or any other person is uncertain about the use of the Company equipment, refer to his/ her respective department policy, and if he/she is still facing any doubts in this regard, don't hesitate to get in touch with his/her supervisor / Direct Manager / Human Resource / The administration concerned to provide the appropriate guidance.

3. Juffali Physical Security

Always secure the business laptops of employees, important equipment, and personal belongings while working in the Company premise or any related premises. Don't tamper with or disable the security and/or safety devices. Be aware and scrutinize external people on-site or outside the work premises. Promptly report any suspicious activity to the General Counsel and Compliance Officer.

Speak Up

Juffali relies on its employees and other stakeholders in every part of our business to speak up about issues and concerns to improve our operations and act with integrity. People who come forward with concerns play an important role in maintaining our ethical workplace. You are expected to report suspected law violations, policies, and Juffali Business Conduct Guidelines.



To encourage an open, candid culture, Juffali offers several channels for you to ask questions and speak up:

Your supervisor
or manager

General
Counsel

Compliance
Officer

Speak Up
tool



Non-retaliation

Regardless of the channel you use to speak up, Juffali is committed to addressing the issue fairly.

The Company will not tolerate retaliation or discrimination against any person for raising a genuine concern or assisting in an investigation.

Retaliation can take many forms, including threats, intimidation, harassment, bullying, humiliation, negatively changing work responsibilities or conditions, or raising issues against someone maliciously or in bad faith. Anyone found to have engaged in retaliation is subject to disciplinary action, up to and including dismissal.



Decision-Making Aid

You will sometimes be faced with situations where the right course of action is hard to determine. Juffali decision-making AID will help you ask the right questions to define a course of action that supports Juffali values.

• Assess the course of action

- Is it Legal?
- Does it comply with Juffali's Business Conduct Guideline?
- Does it align with Juffali's Values and Culture?

• Evaluate the possible impact

- How will it affect the stakeholders?
- Could it affect Juffali's reputation?

• Decide

- If you feel confident about your decision, proceed.
- If you are still unsure about the right course of action, consider alternatives, and speak to Compliance Resources for final confirmation.



Compliance Resources

• **Manager or supervisor**

If you have questions on how the Juffali Business Conduct Guideline applies to your specific job role, the best place to start is with your immediate manager or supervisor.

• **Compliance Ambassador**

Juffali Compliance Ambassadors are assigned to many of the wholly owned companies. They are a great resource and guide to understanding more specific questions and guidance regarding special transactions.

• **Juffali Compliance Portal**

Visit the Juffali Compliance Portal
(<https://eajbcomsa.sharepoint.com/sites/CompliancePortal>).

• **Compliance Officer**

The Compliance Officer is a corporate resource available to address your questions or concerns about our company's values and standards of conduct.