



SUPPLIER CODE OF CONDUCT

HADEED GLOBAL PROCUREMENT SERVICES

Supplier Code of Conduct

Introduction from HADEED Vice President, Procurement Services

Dear Supplier,

At HADEED, we are committed to the highest standards of ethics and integrity in every transaction, and everywhere we do business. We are pleased that you are interested in doing business with us.

We are always looking to work with suppliers who share our values. We require that you operate on similar ethical principles and that you conduct your business in an economically, environmentally and socially responsible manner. HADEED's standards for our suppliers are included in this non-exhaustive global supplier code of conduct ("Supplier Code of Conduct").

The Supplier Code of Conduct applies to those parties' providing products or services to HADEED. We also expect third parties that you work with to observe our standards.

Failure to follow our Supplier Code of Conduct may result in non-consideration for (future) business or in termination of an existing relationship. All suppliers have a duty to raise integrity concerns or violations promptly. We strictly prohibit retaliation of any kind against anyone for raising or helping to address an integrity concern.

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OVERVIEW

Our Supplier Code of Conduct applies to Suppliers and their employees, agents, subsidiaries, and subcontractors that provide goods or services to HADEED anywhere in the world. For our purposes, "Supplier" means the legal entity specified in the HADEED purchase contract / purchase order as the supplying party, including but not limited to, manufacturers, tollers, logistics providers, waste handlers, consulting firms, independent contractors, and staffing agencies.

PURPOSE

At HADEED, we conduct our business in an ethical, legal, and safe manner. We strive to be socially and environmentally responsible. HADEED requires our Suppliers to share this commitment and to abide by the principles contained in our Supplier Code of Conduct. We describe our expectations for our Suppliers in more detail below. Your work is critical and reflects on not only HADEED, but also affects our stakeholders and the communities where we operate.

"Upholding the highest standards of ethical, social, and sustainable conduct is what we expect from you."

PROCEDURES

As a HADEED Supplier, you must obey all applicable laws, codes and regulations including those set forth in the relevant procurement documents, including but not limited to proposals, invitations to bid, and resulting contractual and purchasing agreements. We want our Suppliers to conduct business in accordance with the highest standards of integrity. HADEED expects you will meet these requirements in each of the following areas:

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ENVIRONMENTAL, HEALTH AND SAFETY PRACTICES

We expect our Suppliers to provide workers with a safe and healthy workplace that complies with all applicable health and safety laws and regulations.

- Ensure that your facilities are designed and safely operated in accordance with laws as well as established government and industry environmental protection and safety standards.
- Ensure that your facilities do not present unnecessary risks to the environment or public.
- Maintain safe, sanitary and healthy environments for all employees at all job sites.
- Obtain, maintain and comply with all environmental permits.
- Properly handle hazardous materials and properly dispose of waste in an environmentally sensitive manner.
- Monitor, control, and responsibly treat discharges generated from operations.
- Conduct appropriate routine employee safety training, validation and provide adequate safety equipment.
- Maintain records of safety training and monitoring safety performance.
- Fulfill contractual obligations and perform your activities considering social responsibility and environmental protection.
- Ensure that your employees follow health and safety rules and regulations, perform their duties and work in a manner that will not endanger themselves or others.
- Provide training required to promote sound public health and hygienic practices.

FAIR COMPETITION

HADEED is committed to competing fairly and following antitrust and competition laws. We expect the same from our Suppliers. Do not enter into any agreements that violate anti-competition laws.

- Do not engage in collusive bidding, price discrimination or other unfair trade practices.
- Never discuss pricing, other commercial terms, or splitting potential customers or territories with competing Suppliers.
- Do not take part in any other tactic to restrict competition.

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Responsible Sourcing

HADEED seeks to work with Suppliers who share our commitment to social and economic development and the sustainability of the communities we serve.

- Source goods and/or services from others that meet country of origin standards for health and safety, working hours, pay, employment conditions and environmental protection.
- Work to safeguard the well-being of people involved in our supply chain, to protect the places where you source and process materials, and to ensure that the sale of minerals or other raw materials does not finance armed conflict or human rights abuses.

Accurate Accounting and Business Records

We rely on our books and records to report our financial results, make required legal filings, and make business decisions. As our Supplier, you must keep accurate records of all your business dealings with HADEED. Keep these records according to relevant accounting practices. You also must handle HADEED data in a safe, confidential and secure manner.

- Create, retain and upon request, provide accurate records of all matters related to your provision of goods and/or services to HADEED.
- Protect HADEED's confidential information and prevent its misuse, theft, fraud, or improper disclosure with adequate security measures, preventing access to third parties.
- Do not ask current or former HADEED employees to improperly disclose any confidential, proprietary, or restricted business information obtained while at HADEED.
- Do not share third party confidential information with HADEED employees.

Trade Control

HADEED follows the international trade laws and regulations that apply to our business, and expects our Suppliers to do the same. Remember that import and export laws apply not only to goods but also to technology, software, intellectual property, and technical information.

- Follow all pertinent trade control regulations and promptly inform HADEED if any products or technologies that you provide are subject to export control restrictions.

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Bribery, Kickbacks and Fraud

Bribery is illegal everywhere. You must follow applicable anti-corruption laws. Do not tolerate, permit, or engage in any form of corruption, extortion, or bribery. This is true whether you are working with government officials or individuals in the private sector.

- Do not offer bribes, “kickbacks” or other payments designed to influence or compromise the conduct of HADEED or its employees.
- Avoid even the appearance of unethical practices with regard to existing or proposed business relationships with HADEED.

Business Gifts and Hospitality

- Do not give Business Gifts of any value to HADEED employees. “Business Gifts” include fruit baskets, flowers, cookies, moon cakes, and advertising novelties such as pens, mugs, or T-shirts.
- As opposed to our strict policy on the receipt of Business Gifts, in limited cases, HADEED employees can give and receive Business Hospitality. All Business Hospitality, including meals, lodging, travel and entertainment should only be used for the appropriate furthering of business interests.
- Do not give Business Hospitality worth more than \$100 USD per person, per event, to HADEED employees.
 - Examples of legitimate Business Hospitality include meals surrounding business meetings, social events, show tickets, sporting activities or events, airfare, car service, and standard hotel rooms.
 - Use Business Hospitality to build goodwill and sound working relationships, but not to gain special advantage.

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Fair Employment

Our Suppliers must respect each individual's rights, personal dignity, and privacy. We are committed to an inclusive work environment that recognizes the contributions of every individual and where all people are valued and respected, and all have opportunities to reach their full potential.

- Observe laws that pertain to freedom of association, privacy, prohibition of forced, compulsory and child labor, and local non-discrimination, as well as laws on working conditions, wages, benefits, working hours and overtime.
- Provide a working environment free from harassment and do not engage in any harassment directed at a person.

Conflicts of Interest

As part of our commitment to transparency, Suppliers must avoid conflicts of interest. It may not always be clear whether a situation presents a conflict. In those instances, the best course of action is to disclose the potential conflict to HADEED and let us work through it together with you.

- Promptly make known current and potential conflicts of interest, close personal relationships and/or instances of unethical or fraudulent behavior.
- Cooperate with any investigations into such conflicts.

Technology, Assets, Facilities

As a HADEED Supplier, you may be trusted with a range of HADEED technology tools and other assets.

- Protect both HADEED's property and our customers' assets.
- Use all assets - including funds, data, systems, equipment, materials, premises, or vehicles - only for their authorized and intended purpose.
- Prevent falsification, distortion, misuse, improper access, destruction, or sabotage of assets, documents, or other property.
- Protect our computing facilities and/or data from theft, misuse, and abuse by preventing access to third parties (unless explicitly agreed by HADEED) and by maintaining adequate security measures at all times.

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Insider Trading

- If you have access to material, non-public information about HADEED or other companies, never buy or sell securities in those companies or provide that information to others who might trade on it.

Data Privacy

We expect our suppliers to process personal data in accordance with prevailing data privacy laws, rules and regulations.

- Take appropriate technical and organizational security measures to protect personal data against loss, unauthorized access or unlawful processing.

MONITORING AND COMPLIANCE

The operation of this Supplier Code of Conduct is a shared responsibility between HADEED and our Suppliers.

Please hold periodic internal reviews, inspections and audits to ensure that you and your employees (and any party working with you in providing services and products to HADEED) are meeting the requirements contained in this Supplier Code of Conduct. If you find areas of non-compliance, notify HADEED Global Procurement Services with regard to both the non-compliance and any plans to remedy it. We are ready to work with you to correct identified issues.

HADEED, or our representatives, may request periodic monitoring, including on-site audits or inspections of facilities, use of questionnaires, review of publicly available information, or other measures to assess Supplier performance and compliance with the Supplier Code of Conduct. The results of these activities are used in the selection of Suppliers and to invite bidders for new HADEED opportunities.

TRAINING

You are responsible for the conduct and actions of your employees. As such, please communicate the requirements of this Supplier Code of Conduct to your personnel working on HADEED matters, including your agents and subcontractors. You should provide sufficient training and supervision to ensure that the workers assigned perform work for HADEED and its affiliates observe the principles contained in this Supplier Code of Conduct.

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RAISING AN INTEGRITY CONCERN

You are responsible for raising integrity concerns about potential or actual violations of our Supplier Code of Conduct or applicable laws in a timely manner. You may raise concerns via integrity@Hadeed.com.

You can report concerns anonymously and all reports are treated confidentially. We are committed to review and address all concerns we receive. We want all Suppliers to cooperate fully to ensure a meaningful and thorough investigation.

NON-RETALIATION

Please note that HADEED strictly prohibits any retaliation against anyone for raising or helping to address an integrity concern in good faith.

We also expect our Suppliers to help prevent retaliation and address confirmed allegations as necessary. If you believe someone at HADEED has retaliated against you, please contact integrity@Hadeed.com.sa so that we may conduct an investigation.