



## Baida Code of Conduct

### Introduction

At Baida we conduct our business with high ethical values and in compliance with all applicable laws. This involves setting, reviewing and updating our systems of internal control and providing comprehensive and transparent disclosure of financial results and other critical information to the public. Good ethics and values promote growth and expansion, provide opportunities for the Company and our employees, strengthen our corporate governance and provide the necessary transparency for our stakeholders. This Code of Conduct sets out a framework for our behavior as we conduct our business. Compliance with this Code of Conduct will reinforce the good image of our Company with all those who transact business with us, with the Company's shareholders and more importantly among ourselves. We will all appreciate the value of this Code and how, knowing that the Company adheres to the highest ethical, moral, legal and business standards, which includes a zero-tolerance to corruption in the workplace, it contributes to our self-esteem. Just as important are our founding principles of respect, reliability and trust which make Baida and our employee's good corporate citizens in a diverse global environment. Our aim is quality and excellence in all that we do. Please read the Code thoroughly. Integrity starts with each and every one of us. Understanding this Code and adhering to its standards will enable us to achieve our goals in promoting the growth and success of our Company. This Code will not be a success unless we all provide our wholehearted cooperation and complete support. Every day as we conduct our business in line with this Code of Conduct, we safeguard the future of Baida.

Thank you for understanding the importance of successfully implementing our Code of Conduct.

Omar Sartawi

General Manager

## **Our Code of Conduct**

This Code of Conduct (the “Code”) sets out the seven overarching principles and standards that we believe are central to maintaining the integrity of our business. Whoever we deal with and wherever we operate, we are committed to doing so ethically and in compliance with all local, national, and international laws and regulations.

This Code is supported by policies and procedures. These will assist employees and contractors who work on Baida’s behalf to put into practice the good behaviors that this Code requires.

Each supporting policy should be treated as part of this Code and should be complied with at all times when conducting Baida business.

Baida is committed to communicating the requirements of this Code to all employees and to contractors when they work on Baida’s behalf. Baida also conducts an ongoing program of training and certification of staff on our policies and procedures to enable them to conduct their business in accordance with the standards of business set out in this Code.

## **Who Does This Code Apply To?**

This Code applies to all full and part-time Baida employees and all temporary staff. In addition, it sets out the principles and standards with which we expect third parties to comply when they conduct business for or on behalf of Baida.

## **Sharing Responsibility and Supporting Each Other**

We are each individually responsible for how Baida delivers the principles and standards set out in this Code. Most importantly, we must all understand the requirements of this Code. However, this Code cannot cover every situation. Therefore, employees must also be able to exercise good judgment in addressing the situations that the Code does not specifically mention and apply its spirit to those situations.

Managers across the group are responsible for showing leadership to their teams in the matters set out in this Code, to support their teams in understanding this Code, and for answering questions about its meaning and application.

If you are ever unsure of the meaning of any aspect of this Code or its application or do not know how to respond to a situation that it does not specifically address, please ask questions.

In the first instance, your manager should be able to help you. However, you can also address questions to members of Senior Management, the Compliance Department, Legal Department and HR Department.

## **Our Overarching Principles**

At Baida we are committed to operating our business in line with the following seven overarching principles. These principles reflect the spirit of the obligations and responsibilities set out in this Code.

### **Quality**

Baida applies the highest standards of quality in everything that it does – its systems and processes, its manufacturing and operations, and its products.

### **Reliability & Responsiveness**

Baida will be a consistent and dependable business partner. Baida strives to meet or exceed customer expectations, will listen to the requests, suggestions, and complaints of its customers, suppliers, and employees in good faith, and respond accordingly and appropriately.

### **Dignity & Respect**

Baida respects the dignity and human rights of its employees and others. Privacy and confidentiality are essential to business and Baida will respect the privacy of its customers, counterparties, and employees, and is committed to maintaining the confidentiality of their information. Baida is not discriminatory and offers equal opportunities to all.

### **Integrity**

Baida does not condone or participate in any form of corruption and refrains from doing business with those who do not meet its standards. Nothing ever compromises Baida's commitment to business integrity.

### **Development**

Baida invests in its employees and makes it a priority to create opportunities for them to enhance their skills and knowledge in a safe and healthy work environment.

### **Transparency**

Baida will be open and honest in conducting its business. Baida will provide stakeholders with relevant, accurate, and timely information. Baida's transactions will be recorded fairly and accurately and will be clearly reported.

### **Citizenship**

Baida recognizes the role it can play in its communities and believes in giving back to those communities. Baida will promote economic and social development, environmental responsibility, and supports diversity and social integration.

## Our Standards

The Overarching Principles of this Code translate into the following standards of behavior in the way that we conduct our business.

### Anti-Bribery and Corruption

Baida has zero-tolerance for bribery and corruption.

All directors, officers' employees, and other individuals working for Baida and joint ventures in which it has an equity control are prohibited from accepting, offering, or giving, either directly or indirectly, money or anything else of value, as a bribe or inducement:

- to make, (or as a reward for making or not making), a decision that is favorable to Baida's interests; or
- to seek to gain an unfair business advantage or otherwise influence business activities; or
- which compromises their judgment or their ability to act objectively.

This standard applies to interactions with all individuals and corporate bodies with whom Baida does business – healthcare professionals, customers, suppliers, professional bodies, regulatory authorities, and NGOs – regardless of where they are located geographically.

Baida will undertake due diligence on business counterparties. We will not do business with third parties whom we find to engage in corrupt practices or who fail to meet the standards we require.

At Baida we will:

- Act honestly, ethically, and with integrity in all company interactions
- Not engage in or condone bribery or any other form(s) of corruption
- Not give or receive gifts or hospitality where this could give rise to a perception of a corrupt purpose

### Failure to Prevent the Facilitation of Tax Evasion (Compliance with Criminal Finances Act)

Baida does not tolerate tax evasion or the criminal facilitation of tax evasion.

All directors, officers, employees, and those providing services to, for, or on behalf of Baida should conduct themselves in accordance with this standard. No employee or associate of Baida should feel pressured into offering or agreeing to provide assistance to enable another person to unlawfully evade tax for any reason on behalf of or for Baida. No employee or associate will suffer adverse consequences for refusing to agree to facilitate tax evasion or for taking steps to report any concerns that an offense has been committed.

At Baida, we will:

- Carry out appropriate due diligence on new associates and regularly review existing associates
- Not engage in or condone the facilitation of tax evasion
- Provide appropriate training to all employees and directors in relation to this standard

### **Anti-Slavery (Compliance with Modern Slavery Act)**

Baida is committed to ensuring that “modern slavery” in the form of forced or compulsory labor and human trafficking does not take place in any of its businesses or supply chains across the globe.

At Baida, we will:

- Train staff on labor standards and how to recognize and respond to any incidences of modern slavery
- Undertake periodic analysis and management of any modern slavery risk in Baida’s businesses or supply chains
- Carry out appropriate due diligence and engage on the issue with supply chain partners

### **Conflicts of Interest**

Employees must not allow personal, family, or business relationships to influence their professional judgment or the performance of their duties to Baida. A conflict of interest arises where an employee’s personal, social, financial, or political interests influence that person’s objectivity or independence with regard to the performance of their role with Baida.

Baida employees will:

- Declare to the company any external interests that they think give, or may give, rise to a conflict of interest
- Seek advice on concerns they may have about matters which may potentially conflict with their employment obligations
- Refrain from pursuing personal benefit opportunities discovered through their position at Baida
- Not enter into any undeclared arrangement in which personal interests’ conflict with those of Baida
- Not participate in any decision at Baida that involves any third party in which they or an immediate family member is interested
- Not accept gifts, hospitality, or other entertainment of a nature that could be seen to compromise their independence or influence their professional judgment

### **Trading, Customers, and Suppliers**

Baida will communicate in an open and honest manner with its customers and suppliers, subject to the requirements of confidentiality and competition constraints. Baida believes in dealing with customers and suppliers fairly and in good faith in order to build successful, long-term relationships.

Baida will engage in free and fair competition and not seek competitive advantage through unlawful means. Baida will not collude with competitors on prices, bids, or market allocations, nor exchange information with third parties in a way that could improperly influence business outcomes.

Baida will comply with the requirements of trade regulations, restrictions, and sanctions approved by recognized national and international authorities where they apply to the operation of our business.

At Baida we will:

- Not acquire commercial information by dishonest, unlawful, or unethical means
- Avoid deceptive and misleading statements in customer-related activities such as marketing, sales, and research
- Respect and protect suppliers' and customers' confidential and proprietary information and use it only for the purpose for which it was given
- Only exchange non-public or sensitive information about Baida with third parties where necessary for legitimate business purposes
- Never engage in restrictive trade practices or make agreements that are anti-competitive
- Not do business in breach of recognized trade restrictions or sanctions Baida seeks to engage with customers and suppliers whose employment practices respect human rights and whose ethical standards meet the standards set by Baida.

### **Product Information**

Baida is committed to the highest standards of quality for our products and the information supplied regarding them.

### **Employment Matters**

Baida operates a discrimination-free working environment and is committed to promoting a culture of respect, dignity, and equal opportunity in which employees' individual rights are protected. Baida believes that the diversity of its workforce is highly valuable. Baida is committed to providing an environment in which individuals can flourish based on talent, experience, and performance and where potential is recognized and encouraged.

Baida is opposed to all forms of forced or child labor.

### **Health and Safety**

Baida is committed to providing for its employees a safe and secure working environment.

At Baida:

- Health and safety policies are developed, consistently applied, enforced and updated to protect employees from avoidable injuries
- Employees' well-being at work is looked after
- Individuals are trained to understand the hazards associated with their work, so that risks can be appropriately managed
- Health and safety laws and regulations are understood and complied with to protect both workers and visitors in our facilities

شركة البیداء للطباعة والتغلیف ذ.م.م

**Al-Baida for Printing & Packaging L.t.d**

Tel.: +962 6 40 28 356/7 - Fax.: +962 6 40 28 358



## **Comments**

Baida will continue to train its employees on the principles and standards set out in this Code, and the policies and procedures that underpin its operation. This Code, and the policies and procedures that support it, are the responsibility of the Board of Directors and the Compliance, Responsibility and Ethics Committee of Al-baida for Printing & Packaging L.t.d The Committee always appreciates feedback, and this should be directed to the Compliance Department Baida for onward communication to the Committee and its members.