

CODEOF

ACTING WITH INTEGRITY





1

BUSINESS ETHICS POLICY

1 1 TRADE LAWS COMPLIANCE POLICY

- Complying with international trade laws that protect fair competition and regulate agreements between competitors or resellers.
- Avoidance of practices that can impede fair competition, such as pricing discrimination and price fixing, use of confidential data to gain commercial advantage.

1.2 EXPORT COMPLIANCE POLICY

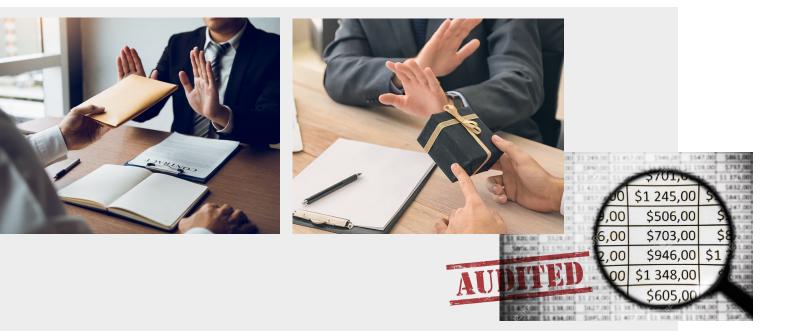
- Complying with international trade laws.
- Complying with international import/export control regulations.
- Complying with sanctions laws.

ANTI-BRIBERY AND CORRUPTION POLICY

- Zero tolerance to bribes.
- Prohibition of accepting gifts from current or potential clients, agents that may influence the employee/s judgement.
- Facilitation payment forbiddance.
- Prohibition of giving gifts to vendors, agents or business partners that may affect the vendor judgement.
- Prohibition of contributions to political parties in a way to obtain unfair advantage.
- Prohibition to be used as a channel for money laundering and other financial criminal activities including selling to sanctioned parties or territories.
- Charitable contributions or sponsorships not to be used as subterfuge for bribery.

FINANCIAL REPORTING

- Sound financial reporting.Compliance to financial reporting standards.
- Tax Laws compliance.



2 HUMAN RIGHTS, AND LABOR PRACTICES

- 2.1 Respecting and promoting the human rights of stakeholders, including but not limited to own employees, women, children, indigenous people, third-party contracted labor and local communities according to UN declaration of Human Rights and ILO (International Labor Organization) Declaration on Rights at Work.
- 2.2 <u>Inclusion and Non-discrimination:</u> Avoiding all form of discrimination, such as race, color, gender, ethnicity, language, religion, country of origin, nationality and disability, cultural background, or any other status.
- 2.3 <u>Child Labor:</u> against child labor within business operation along with our supply chain.
- 2.4 <u>Modern Slavery:</u> against uses of any forms of forced, involuntary or compulsory labor or involuntary labor of any kind within business and within our suppliers and partners. There must be no use of corporal punishment, abuse (physical or psychological), threats or coercion in carrying out duties for supply of goods.
- 2.5 Occupational Hazards and Safety: Complying with relevant laws and regulations on occupational health, safety, and the working environment. Implementing safety measures required by laws and regulations while providing personal protective equipment, diffusing the appropriate safety procedures and systems and carrying out safety training among employees along with emergency preparedness plans and trainings.















3

ENVIRONMENTAL POLICY

- Complying operations, products or service, material use and logistics with environmental laws and regulations and other related-standards, in the way that minimized the environmental impact within facilities, in upstream operations (supply chains) and also in downstream activities.
- Reducing pollutants emission: reducing air and water pollution.
- Increase recyclable content of purchased material and reducing wastes, improving resource efficiency and clean production.
- Encourage and enhance biodiversity and ecology.
- Considering the wider global impact of all activities including those of our suppliers, customers and other stakeholders and include the Environmental issues in all business strategies and initiatives.



SOCIAL RESPONSIBILITY

- Contributing positively to societies where we operate.

CORPORATE VALUES

LEADERSHIP

We believe that leadership is a team effort built upon the mutual respect and fair treatment of employees, customers, and suppliers along with strong community relationships, all developed through honesty and accountability. By demonstrating integrity, humility, and trust-worthiness our companies stand apart from our peers and make positive impacts in our communities. Everyone in the organization has the opportunity to lead by example: showing respect in all interactions, taking responsibility for their own actions, inspiring trust through honesty, and contributing to the success of our company.

PEOPLE

We have a personal and professional commitment to protecting the health and safety of our employees, customers, suppliers, service providers and the people in the communities in which we operate. Ghaddar Machinery believes that one person can make a difference, but that ongoing success requires a diverse team of dedicated people and companies working together to make a significant difference. Both the individual and combined strengths of our Family of Companies make Ghaddar Machinery the industry leader.

SERVICE

Our aim is to deliver value to our customers by providing the highest service levels possible. We deliver what we promise when we promise it, while always striving to improve and exceed customer expectations. Serving customers the right way is the only way we operate. Our customers, no matter their size, end market, or unique supply requirements, will never receive less than our absolute best effort to deliver excellence on all measures of quality and service. We strive to always be flexible and agile in servicing our customers' needs.

DIVERSITY

We value diversity in our people, products, and services. Ghaddar Machinery is rooted in the unique and diverse cultures within our Family of Companies. This diversity of skills, services, knowledge, and ideas is cultivated to generate new solutions and processing capabilities that enable us to adapt, innovate, and rapidly respond to the evolving and precise needs of our customers. We also continue to focus on what we do well, where we do it best, and maintaining a strong local presence in our markets. We maintain our unique company culture and core values despite external pressures.

INTEGRITY

We expect our employees to conduct themselves with honesty and integrity in all of their dealings with customers, suppliers, service providers, and the people in the communities in which we operate. Our responsibility and accountability to stockholders requires a diligent commitment to excellence and ethical business practices, ensuring sustainable profitability. Committed to honesty and fair dealings, we set the highest standards for business practices, adhere to applicable regulations, give back to our communities, and ensure a safe and productive workplace for our employees.

PARTNERSHIP

Success is grounded in loyal and trusting partnerships with our customers, suppliers, and communities. Building and maintaining strong relationships is critical to the way we operate and it is our goal to always develop and respect collaborative partnerships. Partnership means being committed to fair and trustworthy relationships with our customers, suppliers, and communities so they may be the best they can be.

