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Note :

In Order to Enhance Performance, KIG Reserves the Right to Adjust, Amend and Remove any Section of This Code, According to What the Board of Directors Deems Appropriate by a Suitable Resolutions

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## *General Principles:*

The Code of Ethics for the KADDB Investment Group (KIG) outlines the ethical requirements at the Group. KIG's Values and Code of Ethics (The "Code") represents a guide to ethical decision-making, where it assists KIG employees in making the right choices on a daily basis.

The Code of Ethics defines what KIG expects of its business and employees regardless of their work locations or employee background.

KIG works upon embedding The Code within its company's culture in order to enjoy a healthy atmosphere and loyal employees. KIG's top and senior management should motivate personnel to abide by this Code of Ethics.

Abiding by laws, maintaining high ethical standards and upholding our shared values play a prominent role in all of KIG operations and provide the foundation upon which the Group's customers, employees, shareholders and other stakeholders base their confidence in. These principles also play an important role in maintaining the strong value of KIG brand and in promoting long-term sustainability and growth for the Group's worldwide business.

The Code is one of the key corporate policies, that sets out the fundamental principles to which KIG expects all of its employees and business partners to adhere to at all times. The Code is closely linked to, and should be read in the context of, KIG values and other guiding documents, such as KIG Group Policies and Guidelines.

It is the responsibility of KIG as a company and all KIG employees and Board Members to understand and comply with The Code. KIG also expects that all of its business partners at various levels abide by the principles of The Code. All employees and business partners are encouraged and expected to report any incident of non-compliance, with the assurance that there will be no reprisals or other negative consequences for persons reporting in good faith. This Code is a minimum standard, but does not in any way preclude or replace collective bargaining.

While The Code provides guidance on numerous matters pertaining acceptable standards of integrity and appropriate business conduct, it would be impossible to codify every situation that may arise in the day-to-day business of KIG operations. Therefore, The Code cannot replace each employee's or partner's responsibility to exercise his or her good judgement in abiding by the purpose, text and spirit of The Code.

KIG supports and implement the Jordanian Labour Law, and is committed to

comply to the principals of the law in our policies, procedures and day-to-day practices.

## *KIG Values:*

KIG operations are based on the following values:

- **Integrity**  
KIG insists on an honest approach to business. The success of any business is essentially dependent upon the honesty and integrity of its employees. KIG does not compromise in its request for integrity and truthfulness.
- **Enhance the principle of “selecting people based on calibre” and " Eliminating cronyism”**  
KIG strives to select new recruits based on calibre and qualifications that are aligned with the position’s requirement. Although it is very difficult in our community to completely avoid external meddling when recruiting, but KIG will only select the candidates who have the right qualifications and standards.
- **Give credit where credit is due**  
Credit is only offered based on merit. Every employee at KIG will receive acknowledgement only when it has been earned.
- **Treat people as you like to be treated**  
This value assures that all KIG employees will have mutual respect to each other.
- **Perfection in all we do**  
Employees at KIG strive to do everything in perfection. This applies to all jobs at all levels. To be able to achieve this, KIG encourage managers to train their subordinates to accomplish their jobs according to high quality standards and to be accountable for the outcomes of their jobs.
- **Teamwork**  
Teamwork is an essential value at KIG. Teamwork is translated into the actual collaboration between all KIG employees to collectively be responsible and accountable for a job.
- **We learn something new everyday**  
This value emphasizes that KIG is a learning organization. Learning is an important process that can be achieved through training or through learning

from the problems encountered. KIG encourages all managers to facilitate all learning channels and to make available all possible learning tools. Problem-solving techniques are to be taught to employees at levels.

- We strive to do things in a better way  
This value emphasizes the Group's commitment to continual improvement. KIG strives to continually improve the way things are done.

### *Employees:*

KIG's employees are the most valuable resources. KIG aims to be a solid, trustworthy and stable employer, and promotes relationships based on mutual respect and dignity.

KIG strongly believes in the connection between the competence of its employees and the achieved results. To attract skilled people, KIG strives to be an attractive employer that offers good working conditions, fair wages and opportunities for personal development.

### *Compensations and Terms of Employment:*

KIG recognizes the importance of fair wages and reasonable working hours. Information on wages and benefits, as well as other terms of employment, should be communicated clearly to each employee.

### *Health and Safety:*

KIG recognizes the importance of providing a safe and healthy work environment and taking all reasonable steps to prevent accidents and injuries, as well as supporting measures to promoting health and well-being.

- All employees must adhere to all health and safety regulations
- All employees must alert the management to any potential hazards

### *Smoking in Work Premises:*

All Employees have the right to enjoy a smoke-free work premises. In compliance with the laws, regulations, KIG internal system and CEO decisions and notifications in this reference, smoking is strictly prohibited in all KIG premises except for certain designated areas. Accordingly; all employees and visitors must adhere to this regulation. Any breach to this regulation shall be subject to legal and disciplinary procedures.

## *Equal Opportunities:*

KIG is an equal opportunity employer and all employees are to be treated fairly and equally.

Discrimination in hiring, compensation, training, promotion, termination or retirement based on ethnic and national origin, religion, gender, colour, marital or parental status, disability or other distinguishing characteristics protected by applicable law, is never acceptable.

All employment decisions are to be made solely on the basis of a person's ability, experience, behaviour, work performance and demonstrated potential in relation to the needs of the job.

## *Harassment:*

KIG promotes a productive work environment and does not tolerate any form of harassment, bullying or abuse. All employees should be treated and treat one another with dignity and respect.

## *Child Labour or Forced Labour:*

KIG does not employ or accept any form of child labour or forced bonded labour.

## *Alcohol and/or Drug Abuse:*

KIG is committed to providing a drug-free workplace and expects all employees to refrain from any alcohol and/or drug abuse.

## *Hiring Relatives:*

It is highly inevitable in an area which is predominantly occupied by the same or similar community of people to recruit relatives. At the same time, KIG through its policy, regulates employment of relatives in various operating companies by applying principles of equal opportunity and being a fair employer.

It is the intent of this policy that employee relatives from the first to the fourth degree should not be recruited within one company to avoid any conflict of interest.

## *Business Ethics:*

KIG insists on honesty, integrity and fairness and is strongly committed to upholding and promoting the highest ethical business standards in all aspects of its business.

As a leader in the industry, KIG has a far-reaching responsibilities towards the countries, strategic partners, and communities in which KIG operates within. The Group practices good corporate citizenship and complies with the laws and regulations of the countries that it is working with.

KIG also has the responsibility to continue with the improvement of the entire industry by cooperating with trade organization, unions, public authorities and law enforcement bodies. KIG helps develop the services and the market as a whole and thus, raise the standards and wages of the industry.

As an industry leader, KIG has far-reaching responsibilities towards the countries, strategic partners, and communities in which KIG operate. The Group practices good corporate citizenship and complies with laws and regulations in its countries of operation. KIG also has a responsibility to continue the development of the entire industry.

By cooperating with trade organization, unions, public authorities and law enforcement bodies, KIG helps develop services and the market as a whole with the goal of raising standards and wages of the industry.

### *Fair Competition and Anti-trust:*

KIG believes in fair trade and honest competition, based on integrity, product quality, price and customer service.

While KIG may join associations in order to advance in the industry, it does not entertain discussions or enter into agreements with competitors concerning pricing, market shares or other similar illegal activities and is firmly committed to respecting all applicable laws and regulations promoting fair competition.

### *Bribery, Corruption and Money Laundering:*

KIG strives to offer the best possible services targeted to the Group's customers' specific needs and expects to be selected as a provider of services on the basis of merit, in a free and fair competitive environment.

KIG does not offer, solicit or receive bribes, facilitation payments or other illegal payments to obtain or retain business. KIG aims to do business only with respectable business partners involved in lawful business activities and whose funds are derived from legitimate sources.

KIG does not facilitate money laundry, as it abides by the general anti-money laundry principles set out in relevant conventions against corruption and money laundry as consistent with the spirit of The Code.

## *Entertainment, Gifts, Gratuities and Donations:*

Purchasing and sales activities must be handled with utmost integrity. Employees and business partners should not give or accept any gifts, gratuities or entertainment offers that could influence business transactions, the employees, business partners or customer's decision making.

Gifts of minor value are sometimes part of the local business culture, and, as long as it is allowed and legally permissible, it can be accepted as long as there is clearly no "quid pro quo " expected.

## *Conflict of Interest*

Business decisions must always be based on objective reasons and criteria. Employees and business partners must avoid all conflicts of interest or perceived conflict of interest between their personal activities and their work within KIG. Although employees and business partners may not intend to create a conflict of interest, they should manage their affairs to avoid even the appearance of such a conflict.

If an employee has any doubt about a certain situation, the employee should contact his/her Supervisor to discuss it immediately.

As much as possible, Employees should take into consideration the legitimate interest of KIG.

## *Political Contributions and Political Activities:*

Any public policy or political activity undertaken on behalf of KIG must be lawful, ethical and in accordance with KIG values and policies.

Employees are not allowed to use, or consent to the use of, any corporate fund, resources, or facilitate to support a government entity, political organization, party or candidate, except where legally required and where there is an established, lawful and generally accepted practice to do so.

All contributions made from corporate funds must be lawful, transparent and pre-approved by KIG Board of Directors Members.

## *Privacy and Data Protection:*

KIG respects the individual's right of privacy and is committed to handling

personal data responsibly and in compliance with the applicable privacy and data protection laws.

## *Confidentiality (Trade Secrets)*

All employees and business partners are expected to exercise extreme care to prevent any unauthorized use or disclosure of KIG confidential or proprietary information.

Non-public information which belongs to our customers or business partners and upon which we gain access to through our business must also be protected, in accordance with all legal and contractual requirements.

Confidential information may include, but is not limited to, items such as:

- a) Manufacturing secrets;
- b) Business plans;
- c) Marketing plans;
- d) Investment portfolios;
- e) Payroll records; and
- f) Financial data

The obligation to preserve confidential information continues even after employment ends.

## *Intellectual Property:*

The entire value of our long history of providing professional defence industry is vested in the KIG trademark.

KIG, as well as all employees and business partners, must work to safeguard this trademark and request the valid intellectual property rights of others.

## *Protecting Company Property and Resources:*

KIG property, resources and information systems must be protected and kept secure at all times from unauthorized use, damage, disclosure, diversion or removal, whether through accident, improper act or breach of trust.

## *Government Work:*

Many of KIG's customers are government agencies, public and international authorities and military organizations.

KIG is strongly committed to abiding by all laws and regulations related to working with the government and public authorities, including certain special requirements associated with government contracts and transactions.

## *Disclosures, Records and Internal Control:*

KIG recognizes the importance of having open communications with those that are affected by its operations, whether they are employees, business partners, customers, investors or the public, and their representatives.

Comprehensive and accurate corporate information is available for interested parties and KIG will respond in a timely manner to all inquiries.

All reporting and accounting documentation clearly identifies the true nature of business transactions, assets and liabilities in conformance with relevant regulatory, accounting and legal requirements and is given to our best of knowledge. KIG aims to full accountability.

KIG accounting and reporting standards are set out in the Group Policies and Guidelines and in the KIG Manual.

## *Social Networking:*

KIG respects the individual's right to free speech and freedom to express ones opinion. However, only employees expressly designated to do so are authorized to make public statements on behalf of KIG.

Employees and business partners who engage in activities in social media are encouraged to behave in ways that are consistent with KIG values and policies.

## *Business Dealing:*

KIG seeks building productive relationships with all suppliers, contractors, clients, and alliances based on integrity, ethical behaviour, and mutual trust.

Suppliers, contractors, and alliances should be selected at KIG based on the quality, price, service, delivery, and supply of needed goods and services.

Procurement decisions should be based on objective business rationale and not on personal interest or bias

## *Use of Corporate Letterhead:*

The Group's name, logo or corporate letterhead may not be used for any purpose other than in the normal course of official company business, unless expressly approved by senior management.

## *Use of KIG's Assets:*

It is the policy of KIG to respect the privacy of all employees. However, the expectation of privacy does not extend to the use of KIG's assets, including, but not limited to, desks, cabinets, lockers, telephones and computers.

Theft, carelessness, and waste have a direct impact on KIG's profitability. All employees should endeavour to protect KIG's assets and ensure their efficient use.

All KIG's assets should be used only for legitimate business purposes. This includes any resources, equipment, and facilities. Any suspected incident of fraud or theft should immediately be reported.

KIG's communication systems, including computers, electronic mail, intranet and Internet access, instant messaging, telephones, voice mail, conferencing systems, and paper documents are the property of KIG and are to be used primarily for business purposes.

### *Record Keeping:*

KIG requires honest and accurate recording and reporting of information. All of KIG books, records, accounts, financial statements, and relevant documents and information must:

Be maintained in reasonable detail;

Appropriately reflects KIG's transactions;

- Conforms both to applicable legal and regulatory requirements; and  
Conforms to KIG's policies and procedures.
- Requests for reimbursement of expenses incurred on behalf of KIG must be properly documented and approved in accordance with KIG's policies.
- Periodic and other reports, financial or otherwise, to governmental agencies must present a full, fair, accurate, timely, and understandable disclosure regarding KIG's business and operations.
- Exaggeration, insulting remarks, guesswork, or inappropriate characterizations should be avoided for all business records and internal and external written communication including emails.

All records should always be retained in accordance with applicable laws and regulations.

### *Environment and Sustainability:*

KIG strives to perform its business in an environmentally sustainable way and shall comply with or exceed environmental requirements set by applicable laws, regulations and international agreements.

The Group is expected to continuously seek ways to reduce the consumption of

resources, emissions and waste.

### *Community Involvement:*

KIG acts as a good corporate citizen wherever it operates and supports local, regional and global communities in appropriate ways.

The Group also participate in social projects in regions where it sees a pressing need for the local community to be strengthened.

Through its entities, the KIG interacts with local communities where it operates. KIG recognizes the importance of a proactive and continuous social dialogue with all its stakeholders.

### *Changes to the Code of Ethics:*

Changes to The Code may be made only by KIG's BOD and should be formally communicated to all KIG subsidiaries, affiliates, GMs, Heads of KIG Departments, or Heads of Committees.

Once adjusted, the amendments to the Code of Ethics must be properly communicated to all KIG employees.

Announcement of the amendments should take place, and distribution of the amended Code should replace the previous Code.

### *Implementation and Compliance:*

It is the responsibility of each KIG employee and Board Member to observe and promote The Code. Each GM is responsible for ensuring the implementation of the Code in his/her company.

The Code shall also be communicated and implemented, to the greatest extent possible, in all business partners and employee contractual relationships.

For the purpose of The Code, our customers are not regarded as business partners.

The Code shall be reviewed annually. The ultimate responsibility for this rests with KIG Board of Directors Members.

It is also the responsibility of each KIG employee and business partner to raise concerns about the compliance to The Code.

When an employee or business partner wishes to make a complaint or report a violation of The Code, his/her manager should be informed. If the employee finds it difficult to bring up an issue to the manager, and if the complaint is not resolved or where the allegation is of a serious or sensitive nature, it should be reported through the following channels: "**KIG Integrity System**"

A more detailed description of the complaints procedure, its purpose and use, can be found in the Employee Manual for the KIG Integrity System.

All complaints will be investigated. As far as reasonably possible, an employee's information will be treated confidentially and no employee will be discriminated against for reporting, in good faith, what are believed to be possible violations of the Code. An employee making such report will receive feedback as appropriate.

KIG monitors compliance with The Code on a regular basis, using information reported through the various channels available.

Acts that are inconsistent with The Code must be corrected promptly and employees violating The Code are subject to disciplinary action up to, and including, termination of employment.

Where a violation of the Code results in an offence punishable by law, KIG may notify the authorities of such violation.

## APPENDICES

LG3-MAN1-01  
Code of Ethics Confirmation

Date:

The Chief Executive Officer (CEO)

This is to confirm that I have read KIG Code of Ethics and I am aware of:

- My duty to abide by KIG's Code of Ethics;
- My duty to report any potential fraudulent, illegal, or unethical act or other violation of KIG's Code of Ethics, as soon as they come into my knowledge; and
- Inform the management of any Conflict of Interest on my part, and I Will Provide a Report on These Transactions to the management if it Occurs.

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(Employee's Signature)

(Name of Employee)

(Designation)

(Department)