



Code of Conduct Policy

Approval(s)

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1. Purpose

TAHA International for Industrial Services W.L.L. believes that by providing comprehensive aluminum dross processing services and innovative processing technology, the company takes an important leadership role in Bahraini society, the national economy, and the quest for greening the aluminum industry. The company maintains the highest ethical standards in the implementation of its business to ensure good ethical practices and an environment of compliance with applicable laws, regulations, company policies, contractual obligations, business ethics, and any other compliance requirements as applicable to TAHA International for Industrial Services W.L.L. In line with the regulations of and norms embedded in the economic and societal fabric of the Kingdom of Bahrain, the herein contained ethics and practices are compulsory for all TAHA stakeholders (TAHA management, staff, shareholders, suppliers etc.) in order to facilitate innovation, flexibility and confidence-building in the work environment, whilst maintaining highest ethical standards and to create a professional culture that fits the company's values and its importance in Bahraini society and the national economy.

2. Scope

This policy applies to all persons working for the Company (as defined below).

3. Policy Administrator:

The administrator of the policy is TAHA International for Industrial Services W.L.L.'s Board of Directors.

4. Responsibilities

- 4.1** TAHA International for Industrial Services W.L.L.'s Board of Directors is responsible for preparing and reviewing this policy.
- 4.2** The Board Secretary is responsible for publishing this policy.
- 4.3** All persons working for the Company, including members of the Board of Directors, company employees, contractors, suppliers, and those representing the company before third parties, shall comply with this policy.
- 4.4** The Human Resources Manager shall be responsible for:
 - a. Releasing this policy to the Company's employees and enabling them to review it.
 - b. Ensuring that all Company employees sign an undertaking to abide by this policy.
- 4.5** The procurement department shall be responsible for publishing this policy to all Company's suppliers and contractors for review and compliance.

5. Definitions

The following terms and expressions shall have the meanings they bear as follows unless the context requires otherwise:

5.1 The Company or TAHA: TAHA International for Industrial Services W.L.L.

5.2 Executive Management: People responsible for managing the daily operations of the Company, and proposing and executing strategic decisions, such as the Chief Executive Officer (CEO) and their delegates.

5.3 Employee: Individuals that execute assigned tasks and responsibilities in accordance with the approved organizational structure and comply with relevant policies and decisions considering applicable laws and regulations.

5.4 People Working for the Company: People that work for the company, including members of the Board of Directors, TAHA employees, contractors, temporary employees, suppliers, and any other stakeholders representing TAHA or acting on its behalf.

6. Policy Statement

6.1 Obligations

6.1.1 **The Company shall:**

- a. Respect the importance of each individual (employee, contractor, suppliers, service providers, others).
- b. Provide a suitable work environment based on values and principles ensuring complete transparency and trust, while implementing all approved policies and procedures.
- c. Ensure full compliance with the standards and regulations regarding environment, health, and safety.

- d. Evaluate employees regarding their career path based on their capabilities, merit, and competitiveness, while providing them equal opportunities to enhance their performance.
- e. Provide suitable training and improvement opportunities for employees during their careerpath.
- f. Provide opportunities for reasonable and respectful debates and fair freedom of expression within the work environment.
- g. Encourage the spirit of creativity and innovation and provide opportunities for employees to participate in presenting creative and innovative suggestions regarding the improvement of the Company's operations and services.
- h. Ensure that employees have the right to challenge any decision or file a complaint through well-accessible and safe channels and processes within the Company.

6.1.2 Members of the Board of Directorsshall:

- a. Commit to follow the relevant laws and regulations that govern and regulate the practices, behaviors, and the relationships and interactions between the members and theCompany.
- b. Demonstrate utmost loyalty towards the Company and the Company's interests, growth, and value, as well as putting the Company's interests over their own or any other party.
- c. Ensure to safeguard the Company's interests as well as protecting the shareholders' rights andinterests.
- d. Use the Company's assets and resources for achieving the Company's purposes and goals, and not using such assets and resources for achieving a personal interest.
- e. Protect the confidentiality of internal information of the Company and not disclose such information to any person except within the limits stated or allowed in this Code and all other relevant policies and regulations.

6.1.3 People Working for the Company shall:

- a. Perform their duty with care and loyalty in favor of the Company and work to develop the Company, achieve the Company's objectives and increase its value.
- b. Maintain and enhance the reputation of the Company by demonstrating the appropriate values andethics.
- c. Not use their positions in the Company for the purpose of achieving personal goals for themself or others.
- d. Perform their tasks and duties with responsibility and efficiency in accordance with the best practices within a prescribed time limit andthrough the working hours honestly, accurately, and professionally, while following the relevant laws, regulations, charters, policies, and work procedures, with continual improvement as a key objective.
- e. Devote their time and effort to their official and assigned duties and they shall not indulge in any activities not related to their roles and responsibilities, unless after obtaining a written authorization from a competent authority.

- f. Perform tasks or duties to the best of their abilities outside the official working hours in case of extraordinary circumstances where it is deemed necessary by the employer without contravening the Labor Law and its regulations.
- g. Cooperate and help with any investigation and inspection undertaken by any competent authorities, in every possible way, including but not limited to, providing information, answering questions, and cooperating with the investigators and inspectors according to the work regulations and policies.
- h. Not disclose any technical, commercial, and industrial confidential information for the products and/or services he/she provided or helped directly or indirectly in providing, in addition to any other confidential information related to the work or the Company.
- i. Take diligent care of the machines and tools and resources owned by the Company and placed under their responsibility and care and return unused materials to the Company.
- j. Refrain from any activity that violates the general ethics and behavioral standards, or any behaviors or activities that contradict Islamic Sharia, including offending or incitement against any religious beliefs of others inside the workplace or outside.
- k. Have respect for one another and consider each other's opinions while collaborating to complete tasks efficiently and through expertise sharing.
- l. Adhere to Islamic teachings in accordance with the laws of the Kingdom of Bahrain without exception when dealing and communicating with other employees and respect traditions and cultures.
- m. Refrain from any unethical, negative, and harmful activities, including but not limited to, exploitation, blackmail, physical and emotional violence, sexual harassment.
- n. Refrain from the exploitation of any information of the employees' personal lives with the intent to harm them.
- o. Behave with decency and honesty and refrain from harmful arguments, curses, envy, scandals, gossips, and other acts of similar nature.
- p. Abstain from rumors and cursing and shall not publish negative messages or any that harm the employee's reputation as well as the Company's.
- q. Refrain from provoking employees or agitating them or inciting the employees or clients against the interest of the Company. Issues shall be resolved in a professional manner by following the Company's policies.
- r. Refrain from using social media to discuss the Company's daily tasks and workflow or disrepute the Company or its employees. Any relevant improvement or remedial and suggestions shall be made through the available means of communications within the Company in a professional manner.
- s. Report cases that violate the Company's charters and policies promptly through available channels within the Company.

6.14 Contractors and Suppliers and their representatives shall:

- a. Never disclose any of the Company's technical, commercial, and industrial confidential information (directly or indirectly), as well as any of the professional confidential information related to work or the Company.
- b. Adhere to the Company's regulations, charters, policies and purchasing procedures.
- c. Commit to supplying the Company when needed while maintaining the agreed levels of quality, trust, price, service, time, and any other commercial terms or specifications.
- d. Refrain from presenting gifts, tips or extending invitations to meals or entertainment events whether directly or indirectly for work provided, or the promise for a service or any promise of preferential treatment.
- e. Maintain the Company's reputation.
- f. Report through the available channels about conflict-of-interest cases or any other cases that need disclosures.
- g. Comply with all relevant laws and regulations whilst maintaining highest ethical standards.

6.2 Work Environment and Ethics:

The Company shall provide a safe and healthy work environment that comply with the relevant laws and regulations as well as with the Islamic Sharia and safeguards the career and contractual rights of employees according to their employment contracts. The Company shall also promote and ensure professional behaviors in order to help provide a safe, creative, and healthy work environment that encourages mutual respect and maintains the Company's interests and reputation. To achieve this the employees must commit to the following:

6.2.1 Respect:

Everyone deserves respect and a fair treatment. The Company requires its employees to exhibit respectful behavior when dealing with one another and not to undermine, insult, or disturb others physically or verbally.

6.2.2 Privacy:

The Company shall respect the privacy of its clients and every person that works for the Company and it sets rules and policies that prohibits unauthorized individuals to access personal information.

6.2.3 Human Rights:

The Company shall honor and respect all its employees and let them work by their own freewill without force. The Company shall support and maintain all approved human rights policies and regulations sanctioned by the Kingdom of Bahrain.

6.2.4 General Appearance:

The employees shall consider the following:

- a. Stay well dressed in an appropriate and professional appearance.
- b. Take care of general cleanliness.
- c. Wear the official uniform required by the nature of the work and according to the instructions issued by the Company.

6.2.5 Women's Work Environment:

The Company shall provide a suitable work environment for women according to the related rules from the competent authorities and in line with Islamic Sharia pursuant to the laws and regulations of the Kingdom of Bahrain.

6.2.6 Company's Resources and Properties:

Care must be taken to protect the Company's resources and properties, including, but not limited to:

- a. Use of the Company's resources should be optimized to achieve the Company's goals.
- b. The Company's safety regulations are to be abided by concerning the handling of Company resources and properties to avoid exposure to dangers such as fire or damage.
- c. The protection of computers and the prohibition of unauthorized use must be ensured.
- d. The Company's name, identity, and brand are prohibited to be used for personal purposes.
- e. The Company's equipment and office tools should be used for the work of the Company only.
- f. Working hours shall be utilized to achieve the Company's goals.
- g. Company's assets must be protected from theft or destruction. Any observed incidences must be reported to management without undue delay.

6.2.7 Selling products and Providing Services:

Employees are instructed to showcase Company's products and services in a professional manner while also fully disclosing the facts related to the services and selling terms and conditions to ensure clients are not misled.

6.2.8 Selecting Suppliers:

The Company's employees shall abide by the applicable laws, regulations, policies, and procedures that regulate such activities as mentioned in the Procurement Policy.

6.2.9 Transparency:

The Company and all its employees shall commit to the following:

- a. Follow policies and procedures for suitable disclosure that enables shareholders and stakeholder to review the Company's information.
- b. Ensure that the Company's website includes all required disclosures as stated in the relevant laws and regulations.
- c. All disclosures shall be accurate and timely as required by the applicable rules and regulations, or whenever needed.
- d. Facilitate an environment of free communication among employees and encourage them to share all information related to their work with the Company and as required with their colleagues whilst maintaining confidentiality. This shall be governed by the Company's policies.
- e. Setting suitable procedures that limit the effect of rumors to prevent misunderstandings.

6.2.10 Effective Listening:

The Company and all its Employees shall:

- a. Find effective channels for communication between employees and management to facilitate effective and efficient conflict and issue resolution.

Provide opportunities for employees to ask questions and to express their opinions without fear of repercussions. Encourage the employees to provide operational and capital cost saving suggestions to ascertain better ways of performing their jobs.

7. Penalties

In the case of non-compliance with this policy the Company has the right to impose the approved punishments and penalties according to the Company's regulations, charters, and policies, without prejudice to the Company's right and potentially obligation to resort to the appropriate governmental authorities if such violation is considered a criminal offense. In addition, the penalties imposed by the Company should not prevent the injured party to appeal to governmental authorities, nor does it prevent the imposition of an additional penalty.