

Code of Conduct



Preamble

Code of Conduct (the "Code") covers guidelines outlined around legal and ethical standards of conduct that people (the "employees") of Jazal Holding & its subsidiaries (the "Company") are required to adhere to while performing their rules and responsibilities on behalf of Jazal with our vendors, consultants, subcontractors or clients (the "Business Associates"). This Code provides executive management to focus on core values, monitor areas of ethical risks, provide guidance to people on how to handle ethical issues, provide means to report unethical behaviour, and help to develop a culture of transparency and integrity. All employees are expected to get acquainted with this Code and to apply its core principles in the course of their daily actions. All Employees are accountable for adhering to this Code. This Code should also be communicated to and implemented by the Company's business associates. When concerns arise regarding subjects covered in this Code, or any other issues that may jeopardise the Company's or any of its employees' moral values or integrity, such may be brought to the notice of senior management.

Adherence of laws, rules, and regulations

We have a long standing history of running business in accordance with applicable regional laws and regulations in accordance with the best ethics. This commitment ensures our reputation for transparency, accountability and integrity. Company does not own any illegal actions or misappropriation of any kind by an employee not abiding law of the land. Any violations shall be handled legally without any compromise.

Conflicts of Interest

A "conflict of interest" arises by personal interests interfering in any way with Company's interests. It may arise when employee / family member receives improper personal benefits (including personal loans, services or payment) as a result of his or her position / actions in the Company or gains personal enrichment through access to confidential information. Despite one's best efforts, conflicts of interest he/she may encounter situations where protecting best interests of Company turns out to be a dilemma. Employees are encouraged to collect more information on any conflicts of interest and to share their concerns with senior management to make a choice. Any employee aware of Conflicts of Interest, not aligned with the best interest of the company may do necessary reporting.

Gifts and Entertainment

Corporate gifts and leisure passes are designed to promote friendliness and promote relationships between business associates. Employees along with their immediate families are not authorised to accept or offer gifts and donations on behalf of Company. As we practise fair dealings, accepting gifts or entertainment from business associates may compromise on decisions or bias in requirement favouring other party, we follow strict no compromise policy. If you have any doubts or are unsure if any gifts or entertainment offered of insignificant values are appropriate, please contact your

manager with approval from Finance Department to accept or deny. Bribes can take many forms: "anything of value" literally means anything that might have value, including cash, gifts, meals, entertainment, business opportunities, loans or rebates, Company product, offers of employment, and more. There is no monetary threshold: any amount could be considered as a bribe if it is offered in exchange for a favourable decision or treatment. The "thing of value" does not actually have to be given; the promise or offer alone is prohibited. Donations for any political or social purposes are permitted only on personal behalf and not on behalf of Company within the limits of local laws and in complete transparency.

Environment, Health & Safety

Company focuses to provide a safe and healthy workplace for all employees by ensuring personal dignity, globally accepted human and labour rights, protecting employees from physical or mental harassment of any kind and forbidding any conduct that discriminates or hurts a person. We emphasize on protection and wellbeing of employees, communities and all business associates by incorporating safe working culture. We conduct training and communication as a strategy for fostering a shared culture of health and safety, and encourage our leaders to model their management style around safety. Employees are never allowed to work under the influence of drugs (including prescription medicines) or alcohol that may affect handling duties safely. We commit to be sustainable by bridging a balance between economic growth and continuously improving environmental performance and social responsibility.

Confidential Information

Data and information form important intangible assets generated by the company. Transparent and efficient information distribution is vital to our success. Data and information related to Company's operation is confidential or proprietary. Private information comprises all non-public information that, if revealed, might be beneficial to competitors or hurting the Company's business and harmful to clients. Employees are expected to handle sensitive information entrusted to them with alert and maintain confidentiality. Unless necessary management approvals are taken regarding disclosure of any vital information, it is strictly forbidden to transmit any such information. It is also our Company's policy that all employees must regard handle any data or information about our clients, JV partners, and vendors, as confidential. Never assume all employees or business associates can access or be aware of confidential information, it is limited to people meant to be aware. When an employee leaves Company, he/she is still obliged not to disclose any confidential information. We also respect the obligations of employees from ex-employer, and never ask to reveal any confidential information. However their experience and expertise from prior roles shall be utilised for projects of similar scope and scale. As a part of Company, It is the responsibility of each employee to protect intellectual property (IP) developed over time. As securing data, information, IP is crucial in improving transparency and accountability.

Accurate reporting and Business integrity

All financial statements, books, records, and accounts of the Company must accurately reflect transactions and must correspond to both relevant statutory standards and accounting principles, as well as the Company's internal auditing system. It is the responsibility of every employee to ensure that no fraudulent or deliberately misleading entries are made in the Company's accounting records by you or anyone reporting to you. Employees handling administration must accurately prepare all business records (including, for example, accounting entries, invoices, expense reports, payroll, and financial reports) and record all financial transactions in a timely manner. All Company officials and employees who are responsible for financial or accounting affairs must also guarantee complete, fair, accurate, timely, and comprehensive disclosure in all necessary periodic reports.

Fair Dealing

We believe healthy Competition promotes best trade practices and organisations to grow, as a policy we promote all fair dealings that give opportunity to compete compliance with all applicable antitrust, competition and fair dealing laws in all regions where we operate. We have transparent and excellent operating procedures, never taking unfair advantage of others. Every employee must try their best to treat customers, vendors, competitors, and other employees fairly. We never encourage our employees from gaining any unfair competitive advantage by manipulating, hiding or utilising any confidential information or misrepresenting details by indulging in any other unethical business activities. Antitrust laws must be followed by everyone and are designed to safeguard a competitive economy and promote fair and robust competition. Employees responsible for business development and procurement and contracts have an obligation to ensure that they understand our standards and are informed about applicable competition laws.

Company Assets

Employees entrusted to handle company assets shall ensure their efficient and safe use. All employees are equally responsible for protecting and ensuring appropriate and efficient use of the Company's assets from being lost, vandalised, misused, stolen, misappropriated, or damaged. Any such incidents or actions should be reported to custodians. All assets should be utilised only for legitimate business purposes and misuse of any kinds are forbidden.

Outside Activities

Employees engaged in any business activities out of the interests of the Company, potentially could impact their contribution or chances of conflict of interest may arise. Employees may indulge in freelance/ part time engagement or operate business, unless specifically approved by management. We encourage our employees to volunteer in local communities and participate in charity initiatives, and we applaud their efforts in this area. It is their responsibility to ensure that all such initiatives do not create a conflict of interest.

Employee Rights

The Company is committed to create a workplace that values employee diversity. All HR policies and activities aim to establish a peaceful work environment in which every employee contributes to his or her full potential. Discrimination, harassment, and bullying are toxic practices that can undermine performance, increase attrition rates. We are committed to offer equal employment opportunities and will not tolerate any type of illegal discrimination or harassment. Offensive comments based on gender, age, ethnicity, national origin, religion, disability, sexual orientation, genetic information, social and civil status or any action that intimidates, offends, degrades or humiliates another person, including by means of email, blogs and social networking sites shall not be tolerated. We make best effort to eliminate any kind of racial or religious discrimination and harassments. Any action of sexual harassment by unwanted advances, touching, comments or other behaviour that the recipient finds inappropriate shall be dealt legally. Encourage, celebrate, and learn from our people's cultural diversity; and ensure that all our HR decisions are made without any discriminatory factors but based on merit and promote fair treatment.

Data Privacy

The Company handles data collected from employees and business associates shall comply with all applicable data protection laws and regulations. It is prohibited to use photographic, or other video recording of another person, unless all persons being recorded are aware of the recording and consent to it.

Public Communications

We alert all employees to be careful while using social media and connecting with the general public. In your personal social media, other online postings, or public interactions, you must never divulge sensitive information about the Company or business associates. Employees are not permitted to speak or comment on behalf of the Company unless specifically authorised to do so. If you are requested to speak publicly on behalf of the company, necessary approval and review shall be done on the communication from senior management.

Breach of Code of Conduct

No Code can cover all possible circumstances. It is all employee's obligation to apply the principles outlined in this Code responsibly, using common sense and judiciously. In a situation of dilemma, we advise to take guidance from management before responding. Any serious breach of code of conduct impacting company's business by any nature may result in disciplinary action including termination, as well as legal actions if required.

Cooperation and honest involvement are expected from employees in any investigation of misconduct. Regardless of whether you're an employee, contractor, vendor, or other business associate, you are urged to report any misconduct through the website or directly through the Compliance officer. In general, if you have any questions or issues concerning compliance with this Code, please contact audit@jazalec.com

Acknowledgement Form

The Acknowledgement to Jazal's Code of Conduct must be signed by employees. By acceptance we mean employees or business associates had received a copy, read and agreed with the code.

Company _____
Name Name _____
Signature _____
Date _____