



CODE OF ETHICS

PERFORMANCE WITH INTEGRITY

Ref. No: CQDPR05
Rev. No: 02-021621

ALHAMRANI UNIVERSAL CODE OF ETHICS: STATEMENT OF INTEGRITY



As one of the largest distributors and service providers of technology and payments solutions in the Middle East, we are now a Company with over 900 employees working in the GCC. Alhamrani Universal Company ("AU") performance aligned with the strongest integrity and values. It is the foundation upon which AU is built and the foundation on which we will continue to grow to reach our goals. Ultimately, our good reputation is our most valuable asset.

The AU Code of Ethics represents a core and essential framework for achieving our goals, in every circumstance, by every company representative, the highest levels of ethical behaviour, in terms of our company culture and values, and as per the laws and regulations of Saudi Arabia.

I empower every representative to be a responsible leader of this Code of Ethics and to be fully accountable for not only their own actions, but also those of others through supporting culture, and ethos, in full compliance with this Code of Ethics.

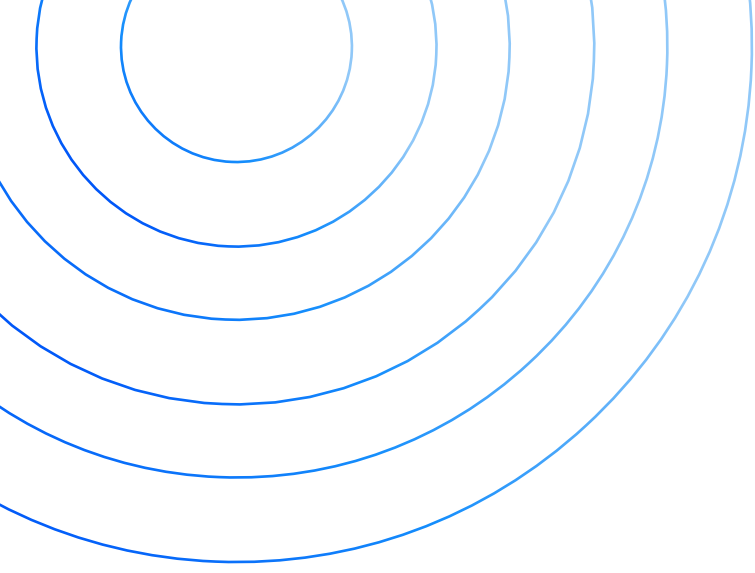
If, beyond the contents of the AU Code of Ethics you require any clarity about what proper conduct is, for you or anyone else, please immediately raise this with your direct manager or "Speak Up" officers.

In support of this, I request that every company representative, whether employee, executive member, Board member, or Board Committee member, or other partners, make a personal commitment to follow and ensure compliance with, the AU Code of Ethics.

All representatives are responsible to "Speak Up" against any behaviours not aligned with this Code of Ethics, or contradict AU culture, ethos or values, and I personally will ensure that any representative who does "Speak Up" shall be protected from any retaliation or inappropriate behaviour of any member of staff.

Sincerely
Wael Abdulmoty
Chief Executive Officer

A handwritten signature in Arabic script, written in blue ink. The signature is stylized and appears to read 'Wael Abdulmoty'. It is positioned below the printed name and title.



WE ARE CONSISTENTLY COMMITTED TO:

Safeguarding Assets:

- We work to high professional standards.
- We declare conflicts.
- We manage risks.

Act Ethically:

- We put our customers first.
- We represent AU.
- We act ethically.
- We protect information.
- We know our suppliers.

Thriving Through Regulatory Excellence:

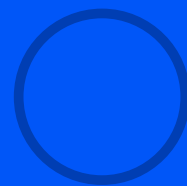
- We comply.
- We respect Saudi law and regulations.

Speak Up:

- We speak up.



**WE ARE CONSISTENTLY
COMMITTED TO
SAFEGUARDING ASSETS**



WE WORK TO HIGH PROFESSIONAL STANDARDS:

To give the best quality care we need great people. So we make sure that our knowledge, qualifications, skills and experience meet our customers' needs and the standards of our profession.

Alhamrani Universal achieved ISO 9001\2015 certification for Quality Management System, ISO 22301:2012 certification for Business Continuity Management and certification for ISO 27001 Information Security Management System. These certificates represent that we have established a level of competence in our business acumen and that we as a company always support policies and procedures.

TO DO	TO AVOID	NEED TO KNOW
<ul style="list-style-type: none">- Keep up with any competence based training that's needed for your role.- Meet and maintain the required responsibilities for your role.- Meet, maintain and improve the standards of your role.- Understand and follow all ISO policies and procedures.- Raise your concerns to your direct manager regarding the role you are performing.- "Speak Up" confidentially using the speak up channels if you can't speak to your direct manager.	<ul style="list-style-type: none">- Breach your professional standards in requirements, policies, procedures and the Code of Ethics.- Fail to disclose information when required to do so.	<ul style="list-style-type: none">- Failing to disclose information that could affect your suitability for your role may put your employment, safety of customers or AU reputation at risk.- If you don't stay up to date with professional accreditations and trainings, you could put AU customers and your job at risk.

WE DECLARE CONFLICT:

To avoid situations where the personal interests, loyalties and relationships could affect AU and the customers.

Alhamrani Universal builds good relations with customers and partners based on trust. We go out of our way to avoid the appearance of conflicts. And if conflict arises, we declare it on the "Conflicts of Interest" declaration form (CQDFM10).

TO DO	TO AVOID	NEED TO KNOW
<ul style="list-style-type: none">- Put your loyalty to AU above your family and friends business situations.- Treat and respect decisions based on the best quality outcome for the customer, not the cost.- Understand and follow the Conflicts of Interest Policy (CQDPRO4).- Raise your concerns to your direct manager regarding the role you are performing.- "Speak Up" confidentially using the speak up channels if you can't speak to your direct manager.	<ul style="list-style-type: none">- Get involved in the hiring, supervising, management or career planning of any relative or partner.- Let your personal relationships influence, or be influenced in your decisions at work.	<ul style="list-style-type: none">- A conflict of interest is a situation where your personal, family or financial interest conflicts with AU or our customers' interests.- If you are not sure whether you have a conflict of interest, ask yourself: Does it affect the choices you make in your job?<ul style="list-style-type: none">• Would people question your ability to do your job if they knew about it?• Would it embarrass you if other people knew about it?• How would your manager feel if it was reported internally?

WE MANAGE RISKS:

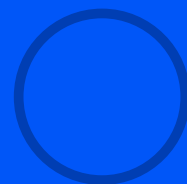
To identify, assess and control threats to AU's capital and earnings. These threats, or risks, could stem from a wide variety of sources, including financial uncertainty, legal liabilities, strategic management errors, accidents and natural disasters.

Alhamrani Universal issued policies and procedures in order to protect customers, partners, suppliers and staff. So we have to understand and follow these policies and procedures to prevent and control things from going wrong.

TO DO	TO AVOID	NEED TO KNOW
<ul style="list-style-type: none">- Think about what might go wrong and harm customers, partners, suppliers or staff.- Develop and apply the right procedures and controls.- Save accurate records to prove that you are doing the right things.- Understand and follow Risk Assessment and Treatment Procedure (ISPRES21).- Raise your concerns to your direct manager regarding the role you are performing.- "Speak Up" confidentially using the speak up channels if you can't speak to your direct manager.	<ul style="list-style-type: none">- Delete any records unless you have a written permission to do so.- Ignore any risk or threat to the business.	<ul style="list-style-type: none">- The role of the Compliance and Quality Department.



**WE ARE CONSISTENTLY
COMMITTED TO ACT
ETHICALLY**



WE PUT OUR CUSTOMER FIRST:

To put the needs and requirements of a customer ahead of anything and everything else. Also, to build healthy relationships with customers by identifying their needs and providing the best-possible experience to customers.

Any company including Alhamrani Universal that puts the customer first is commonly referred to as customer-oriented, customer-driven or customer-focused businesses. A is oriented towards serving the client's needs, and measures customer-satisfaction levels in order to determine the success of its business.

TO DO	TO AVOID	NEED TO KNOW
<ul style="list-style-type: none">- Ask yourself if what you are doing will help customers and have a great experience.-Treat customers with respect.- Always be in touch with the customers.- Deliver to customers what you promise.- Solve customers' problems and complaints.- Sell products and services which meet the customers' needs.- Raise your concerns to your direct manager regarding the role you are performing.- "Speak Up" confidentially using the speak up channels if you can't speak to your direct manager.	<ul style="list-style-type: none">- Ignore customers feedback and complaints.- Tell anyone about confidential information about AU's customers.	<ul style="list-style-type: none">- AU's products and services in order to meet the needs of the customers.

WE REPRESENT ALHAMRANI UNIVERSAL:

To care about the brand and reputation of AU which shown in what we do, how we act and the way we present ourselves.

Alhamrani Universal's brand and reputation have to be protected by everyone. So we behave, act and dress in a professional matter. We understand that whether we are inside or outside work, we still represent AU.

TO DO	TO AVOID	NEED TO KNOW
<ul style="list-style-type: none">- Dress appropriately for your role.- Think about how your actions will affect AU reputation.- Raise to the Compliance team about any misuse of AU logo or trademarks.- Understand and follow the Communications Policy (CQDPR22).- Raise your concerns to your direct manager regarding the role you are performing.- "Speak Up" confidentially using the speak up channels if you can't speak to your direct manager.	<ul style="list-style-type: none">- Use AU equipment, tools or other assets for personal gain.- Post anything on social media that could affect AU brand or its customers.	<ul style="list-style-type: none">- AU policies and procedures.

WE ACT ETHICALLY:

To behave according to the moral standards, rules and regulations set by the Kingdom of Saudi Arabia and Alhamrani Universal Company.

Alhamrani Universal is firmly committed to its values, employment principles and Code of Conduct in promoting a positive workplace culture and environment which is free from all forms of inappropriate workplace behaviours.

TO DO	TO AVOID	NEED TO KNOW
<ul style="list-style-type: none">- Ask yourself if what you are doing will put you under investigation.- Treat your work colleagues with respect and fair.- Be aware of the value of gifts and entertainment that will require approval.- Understand and follow the policies and procedures related to:<ul style="list-style-type: none">• CQDPRO: Gifts, Entertainment, & Travel.• CQDPR21: Respect No Gossip.• CQDPRO2: Anti-Bribery and Corruption.- Raise your concerns to your direct manager regarding the role you are performing.- "Speak Up" confidentially using the speak up channels if you can't speak to your direct manager.	<ul style="list-style-type: none">- Being involved in legal problems.- Being involved in gossip, bullying or harassment cases.- Do anything to compromise AU's reputation.- Accept a bribe.	<p>The Saudi law regarding Anti-bribery and Anti-harassment.</p>

WE PROTECT INFORMATION:

To safeguarding data from unauthorized access or modification internally or externally to ensure its availability, confidentiality, and integrity.

Alhamrani Universal works in a professional environment and achieved ISO 27001:2013 "Information Security Management System" certification.

TO DO	TO AVOID	NEED TO KNOW
<ul style="list-style-type: none">- Lock your computer/laptops while you are away from desk.- Think carefully before you share information with others.- Check the identity of people when you are dealing with customers/suppliers.- Make sure you have a complex and not easy to guess password.- Raise your concerns to your direct manager regarding the role you are performing.- "Speak Up" confidentially using the speak up channels if you can't speak to your direct manager.	<ul style="list-style-type: none">- Tell anyone your login details or passwords or lend anyone your ID badge.- Keep your password posted on your desk or any exposed place.- Let yourself fall for scams or phishing emails by clicking on any link that you don't know.- Leave your laptop or mobile device somewhere it could get lost.- Use customer information for anything other than its intended purpose.	<ul style="list-style-type: none">- The 150 27001:2013 "Information Security Management System" Manual (ISMAN01).

WE KNOW OUR SUPPLIERS:

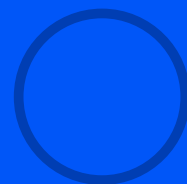
To save the reputation by selecting good suppliers fairly and support achieving the values.

Alhamrani Universal builds good relationships with suppliers who are managed fairly and transparently, keeping the right records and looking after their information carefully.

TO DO	TO AVOID	NEED TO KNOW
<ul style="list-style-type: none">- Put AU first when managing suppliers.- Look after AU's suppliers' confidential information and keep our information confidential too.- Implement due diligence process to know more about AU's suppliers.- Understand and follow the Outsourcing and External Suppliers Policy (ISPRES25).- Raise your concerns to your direct manager regarding the role you are performing.- "Speak Up" confidentially using the speak up channels if you can't speak to your direct manager.	<ul style="list-style-type: none">- Deal with suppliers who break the law.- Commit to any expenditure, whether verbally or in writing, or other purchase order on behalf of AU without proper authorization.- Sign any supplier contract unless you have been authorized.	<ul style="list-style-type: none">- Remember that a contract or agreement does not have to be in writing to be unlawful. It can be expressed or implied, formal or informal, written or verbal.



**WE ARE CONSISTENTLY
COMMITTED TO THRIVING
THROUGH REGULATORY
EXCELLENCE**



WE COMPLY:

Maintaining compliance with laws, rules and regulations is one of the most important factors. Compliance protects the reputation and credibility, protects shareholders and provides safeguards for institutions against legal sanctions.

Alhamrani Universal has a Compliance Department which identifies, assesses and provides advice, monitors and reports on the risks of non-compliance practices which may exposure it to legal and administrative penalties, financial loss, or what may undermine AU's reputation due to its failure.

TO DO	TO AVOID	NEED TO KNOW
<ul style="list-style-type: none">- Support the Compliance Department in order to maintain the compliance culture.- Understand and follow the compliance policies and procedures.- Meet and maintain the ISO requirements.- Raise your concerns to your direct manager regarding the role you are performing.- "Speak Up" confidentially using the speak up channels if you can't speak to your direct manager.	<ul style="list-style-type: none">- Ignore to follow the policies and procedures which affect AU business.- Ignore and do not maintain the ISO requirements which affect ISO certifications.	<ul style="list-style-type: none">- The role of the Compliance and Quality Department.

WE RESPECT SAUDI LAW & REGULATIONS:

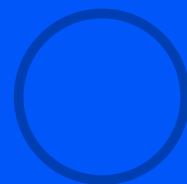
Maintaining our reputation by following the laws, rules and regulations which are implemented in Saudi Arabia.

Alhamrani Universal is committed to the laws, rules and regulations which are implemented in Saudi Arabia such as the competition and antitrust laws and combating financing law.

TO DO	TO AVOID	NEED TO KNOW
<ul style="list-style-type: none">- Understand the basic requirements of the competition and antitrust laws and combating financing law.- Understand and follow the policies and procedures.- Raise your concerns to your direct manager regarding the role you are performing.- "Speak Up" confidentially using the speak up channels if you can't speak to your direct manager	<ul style="list-style-type: none">- Influence a client by stated clearly not to deal with a competitor.- Refuse to deal with a client under normal terms without a valid reason.- Confusing and complicating the customers in products and services.	<ul style="list-style-type: none">- Remember that a contract or agreement does not have to be in writing to be unlawful. It can be expressed or implied, formal or informal, written or verbal.



**WE ARE ALWAYS
COMMITTED TO
SPEAK UP**



WE SPEAK UP:

To raise any concerns, questions or complaints which will be treated confidentially.

Alhamrani Universal is a company where staff are free to question things and are courageous in raising anything concerned about or raising any incident or violation.

What you should speak up about?

You should ask yourself three questions:

- 1- Is it right for our customers?
- 2- Is it right for me and Alhamrani Universal?
- 3- Could I happily explain my decision?

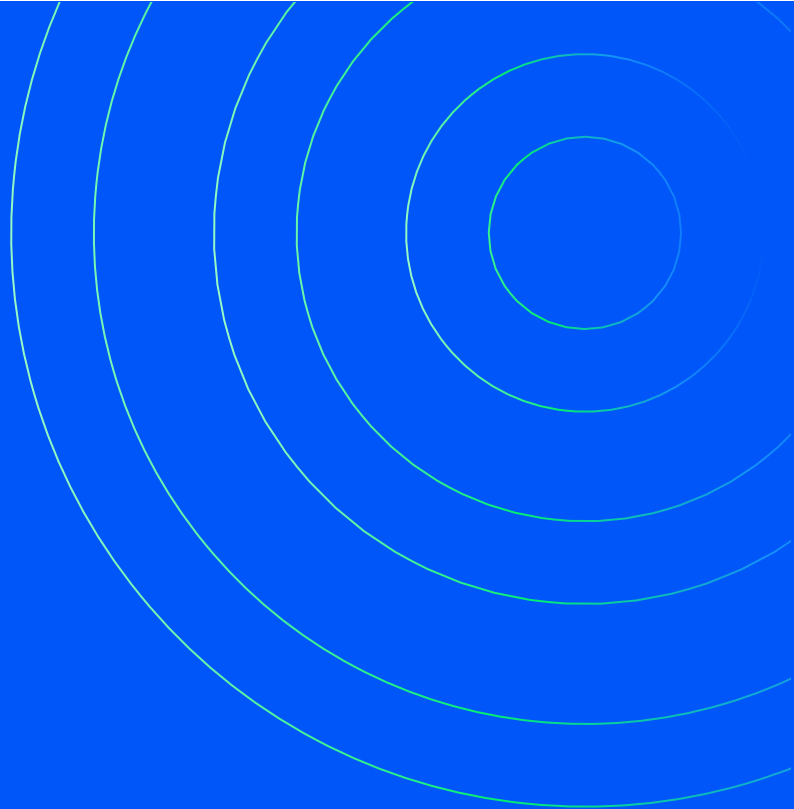
A compliance concern should never be raised for the sole purpose of harming someone's reputation or employment status.

How to speak up?

Be aware of the several channels that you have for raising compliance concerns, which include your manager, Compliance Department or the Compliance Hotline:

STC: 800 844 0102 | Zain/Mobily: 800 850 0402

All cases are raised will be taken seriously and treated confidentially.



CONTACT

FOR QUESTIONS, PLEASE CONTACT

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