



Abdulrehman Alghosaibi G.T.C.

Code of Business Ethics and Conduct

Serving the Medical Field



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Introduction

We, at Abdulrehman Alghosaibi G.T.C. (hereinafter referred to as “Alghosaibi”), are committed to creating a work environment that is safe and transparent that requires our employees to act and think in a way that complies with our values.

Purpose

The Code of Conduct and Business Ethics (hereinafter referred to as the “Code”) acknowledges Alghosaibi’s business, environmental and social responsibilities and serves as a guide to ethical decision making by establishing best business practices.

Code Applicability

This Code applies to all full and part-time Alghosaibi employees and all temporary staff under Alghosaibi. In addition, the Code sets out the principles and standards with which we expect our third parties to comply with, when they conduct business for us or on our behalf, or in collaboration with us.

It is each individual’s responsibility to understand and comply with the standards set out in this Code. However, employees must still exercise their good judgment in addressing different situations as they may not all fall under this Code. Supervisors and managers must support their team in understanding this Code and answering any questions relating to its application. In instances where this is not possible, questions may be addressed to the Compliance Officer or senior management.



Overarching Values

Our values guide our decisions and our overall conduct as employees of Algozaibi

1. Building Trust and Credibility
2. Respecting All Individuals
3. Creating a Culture of Open and Honest Communication
4. Management Leading by Example
5. Upholding the Law
6. Practicing Fair Competition
7. Protecting Proprietary Information
8. Communicating Diligently and Accurately
9. Ensuring Health and Safety
10. Avoiding Conflict of Interest
11. Embedding loyalty





1. Building Trust and Credibility

The success of our business is dependent on the trust and confidence we earn from our principals, employees, customers and shareholders. We gain credibility by adhering to our commitments, displaying honesty, integrity and by reaching company goals solely through honorable conduct. Ultimately, we will be judged by the actions we take.

When considering any action, it is wise to ask:

- Will this build trust and credibility for Algozaibi?
- Will it help create a working environment in which Algozaibi can succeed over the long term?
- Is the commitment I am making one I can follow through with?

The only way we will maximize trust and credibility is by answering “yes” to those questions and by working every day to build our trust and credibility.

2. Respecting All Individuals

We all deserve to work in an environment with dignity and respect. Algozaibi is committed to creating such an environment because it brings out the full potential in each one of us. This in turn contributes directly to our business success. Algozaibi is committed to utilizing each individual’s talent and to providing a workplace that is free of discrimination and all types of abusive, offensive or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to his or her direct supervisor or senior management.

3. Creating a Culture of Open and Honest Communication

At Algozaibi, everyone should feel comfortable to speak his or her mind, particularly with respect to ethical concerns. Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions. We all benefit tremendously when employees exercise their judgment to prevent mistakes or wrongdoing by asking the right question at the right time.

Algozaibi will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the company will take appropriate action. We will not tolerate retaliation against employees who raise genuine ethics concerns in good faith.



Employees are encouraged, in the first instance, to address such issues with their direct supervisors, as most problems can be resolved swiftly.

What happens when mistakes happen?

At Alghosaibi, we foster a culture that allows us to grow and learn from our mistakes. We encourage employees to deal openly with mistakes to prevent them from recurring. It is important that we build trust amongst ourselves.

4. Management Leading by Example

Management has the added responsibility for demonstrating, through their actions, the importance of this Code and leading by example. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example. Ultimately, the action we take is what matters.

To effectively implement our Code, supervisors and managers must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Managers should not consider employees' concerns on ethics as threats or challenges to their authority, but rather as another encouraged form of business communication. At Alghosaibi, we thrive to have the ethics dialogue a natural part of daily work.

Our supervisors and managers must aim to lead by example...



5. Upholding the Law

Alghosaibi's commitment to integrity begins with complying with laws, rules and regulations where applicable, at all times. If we are unsure of whether a contemplated action is permitted by law or Alghosaibi's policy, we should seek the advice from senior management. We are responsible for preventing violations of law and for speaking up if we see possible violations.



What happens when a violation of the code of business ethics and conduct occurs?



Even if the violation does not involve you personally, you are still responsible for reporting it. Timely reporting can greatly minimize and even avoid negative consequences from affecting Algosaiibi.

6. Practicing Fair Competition

Algosaiibi is dedicated to ethical, fair and strong competition. We will sell products and services based on their merit, superior quality, functionality and competitive pricing. We will conduct independent pricing and marketing decisions without improper cooperation or coordination with any competitors. We will not offer or solicit improper payments or gratuities in connection with the purchase of goods or services for Algosaiibi or the sales of its products or services.

7. Protecting Proprietary Information

We must respect the property rights of others. We will not acquire or seek to acquire improper means of a competitors' trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property.

8. Communicating Diligently and Accurately

We will not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any material containing information concerning Algosaiibi, its business operations, plans, financial condition, results of operations or any development plan. We should be particularly vigilant when making presentations or proposals to customers to ensure that our presentations do not contain material information except when specifically approved by senior management for the intended business reasons.



9. Ensuring Health and Safety

Algosaiabi is dedicated to maintaining a healthy, safe and secure work environment for its employees. We strive to continually comply and implement the health and safety laws and regulations to ensure the well-being of our employees is maintained. We are committed to educating, training and motivating our staff to work in a safe and environmentally responsible manner. We promote and foster openness, and our employees are encouraged to share any concerns they may have with their direct supervisor or senior management.

The health and safety of our employees at Algosaiabi is a top priority



10. Avoiding Conflict of Interest

We must avoid any relationship or activity that might impair, or appear to impair, our ability to make objective and fair decisions when performing our jobs. We owe Algosaiabi the commitment to always prioritize its legitimate interests when the opportunity to do so arises. We must never use Algosaiabi property or information for personal gain. Here are some other ways in which conflicts of interest could arise:

1. Being employed by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while you are employed with Algosaiabi.
2. Hiring or supervising family members or closely related persons.
3. Serving as a board member for an outside commercial company or organization or any governmental entity.
4. Owning or having a substantial interest in a competitor, supplier or contractor.
5. Having a personal interest, financial interest or potential gain in any of Algosaiabi's transactions.
6. Placing company business with a firm owned or controlled by one of Algosaiabi's employees or their families.
7. Accepting gifts, discounts, favors, services or conducting deals with third parties to achieve personal gain or benefit, unless the opportunity is not targeted to a specific employee and is generally/equally available to all Algosaiabi employees.



All employees should be familiar with AlgoSaibi’s **Conflict of Interest Policy** and refer to it as the first port of call when they encounter a situation that they expect might lead to a conflict. In case there is a need for further clarification or support advice from management should be sought.

To protect AlgoSaibi from possible conflicts of interest or the appearance of a conflict of interest, it is important to think about and ask yourself:



- Is the decision I’m about to make influenced by personal interest?
- How would third parties and the public react to the decision I’m about to make regarding AlgoSaibi?

11. Embedding loyalty

Integral to AlgoSaibi’s business success is our protection of confidential company information, as well as information entrusted to us by employees, customers and other business partners. Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses or information about other companies, including current or potential suppliers and vendors. We will not disclose confidential information without a valid business purpose and proper authorization.

Anti-Bribery and Corruption

AlgoSaibi is committed to the highest possible standards of openness, integrity and accountability in accordance with the Saudi Anti-Bribery and Anti-Corruption laws and regulations. AlgoSaibi recognizes that customers and business partners or principals need to have confidence in their working operations. A fraudulent or corrupt act can impact this confidence and damage the AlgoSaibi’s image and reputation. In addition to other serious legal and criminal consequences. Therefore a “Zero Tolerance Policy” towards bribery and corruption is adopted in all parts of AlgoSaibi’s operations. Further information is available under the **Anti-bribery Policy** in the **Compliance Policies and Procedures Manual**.

AlgoSaibi does not tolerate nor accept any form of bribery or corruption...



It is important to always consider what our actions reflect on AlgoSaibi.



Facilitation Payments

Facilitation payments are modest payments made for the purpose of expediting or facilitating the provision of services or routine non-discretionary government action which a Public Official is normally obliged to perform. Algosaiibi's Policy does not permit under any circumstances the facilitation payments or any offer of payments to Public Officials, potential business partners, etc. in order to obtain a favourable decision. Making facilitation payments of any kind, whether direct or indirect, are not permitted under this Policy, and the Company will take a zero-tolerance approach towards such payments.

If found guilty, perpetrator(s) will be subject to immediate discipline, up to and including dismissal and civil or criminal action.

Employees' Responsibilities

Employees' responsibilities under this clause are summarized as follows:

- You may not, under any circumstances, request or accept or offer a facilitation payment.
- Report suspicious situations regarding inappropriate payments to Algosaiibi's Compliance Officer.

Gifts, Gratuities and Business Courtesies

At Algosaiibi we are committed to competing solely on the merit of our products and services. We should avoid any actions that create a perception that favorable treatment of outside entities by Algosaiibi was sought, received or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom Algosaiibi does or may do business with. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate laws, regulations or policies of Algosaiibi's **Compliance Policies and Procedures Manual** or would reflect negatively on and damage Algosaiibi's reputation.

Accepting Business courtesies

Most business courtesies offered to us during our employment are offered because of our positions at Algosaiibi. We should not feel any entitlement to accept and keep a business courtesy. Although we may not use our position at Algosaiibi to obtain business courtesies, and we must never ask for them, we may accept unsolicited business courtesies that promote successful working relationships and goodwill with the firms that Algosaiibi maintains or may establish a business relationship with. Employees who award contracts or who can influence the allocation of business, who create specifications that result in the placement of business or who participate in the



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negotiation of contracts must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect the Alghosaibi's reputation for impartiality and fair dealing. The prudent course is to refuse a courtesy from a supplier when Alghosaibi is involved in choosing or reconfirming a supplier or under any circumstance that would create an impression that offering courtesies is the way to obtain Alghosaibi business.

Employees may accept unsolicited gifts, other than cash or cash equivalent (e.g. vouchers, paid trips, etc.), that conform to the reasonable ethical practices of the marketplace, including:

- Consumable gifts (e.g. flowers/ confectionary) and other modest gifts that commemorate a special occasion.
- Gifts of nominal value (e.g. calendars/pens/mugs/caps/t-shirts or other novelty, advertising or promotional items).
- Generally, employees may not accept compensation, honoraria or money of any amount from entities with whom Alghosaibi does or may do business. Consumable gifts that have a market value greater than 300 Saudi Riyals may not be accepted unless approval is obtained from their line manager, finance or Compliance Officer.

Employees with questions about accepting business courtesies should talk to their direct supervisors or the Compliance Officer.

Meals, Refreshments and Entertainment

We may accept occasional meals, refreshments, entertainment and similar business courtesies that are shared with the person who has offered to pay for the meal or entertainment, provided that they are in line with the policies outlined in Alghosaibi's **Compliance Policies and Procedures Manual** and that:

- They are not inappropriately lavish or excessive
- The courtesies are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity
- The courtesy does not create the appearance of an attempt to influence business decisions, such as accepting courtesies or entertainment from a supplier whose contract is expiring soon
- The employee accepting the business courtesy would not feel uncomfortable discussing the courtesy with their direct supervisor or co-worker or having the courtesies known by the public

Offering Business Courtesies

Any employee who offers a business courtesy must make sure that they are compliant with the **Gifts Policy** within Alghosaibi's **Compliance Policies and Procedures Manual**. They must ensure that the gift cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise negatively reflect on Alghosaibi's image. An employee may never use personal funds or resources to do something that cannot be done with Alghosaibi resources. Gifts can be offered to Healthcare Professionals in a symbolic form of 50 Saudi Riyals as a maximum without warranting disclosure to the SFDA, provided it is linked to the medical field, has a benefit to



the patients or serves a genuine educational function. For gifts with a value higher than 50 Saudi Riyals, guidance from the **SFDA Transparency and Payment Disclosure section** of the **Compliance Policies and Procedures Manual** should be followed.

Other than to our public or government customers, for whom special rules apply, we may provide non-monetary gifts (i.e. Algosaiibi logo apparel or similar promotional items) to our customers. Where non-monetary gifts are related to any of the Principals, the Principal's guidelines should be followed. Further than this, management may approve other courtesies, including meals, refreshments or entertainment of reasonable value, provided that:

- The business courtesy is compliant with policies set out in Algosaiibi's **Compliance Policies and Procedures Manual**
- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization
- The business courtesy is consistent with industry practice, is infrequent and is not lavish
- The business courtesy is properly reflected on the books and records of Algosaiibi

Make sure that you review the "Compliance Policies and Procedures Manual" in conjunction with this Code



Additional Considerations



Working Hours

At Algosaiibi, reasonable and consistent working hours for employees are set with the aim of balancing the demands of delivering a healthy working environment at an organizational and industry level.

The normal working hours shall be in accordance with the announcements made in this regard from time to time, which will conform with the Law. Working hours will be at least 45 hours per week excluding the weekend (Friday and Saturday). Employees are expected to report to work on time daily and to remain on the job throughout regular work hours. Employees are expected to maintain a punctual and regular attendance record. Being repeatedly late for work or absent from work without good reason is a ground for disciplinary action. In addition, and equally important, it is expected that management-level employees may be required to work more than 45 hours per week, and, for the avoidance of doubt, overtime shall not apply in accordance with the Saudi Arabian Labor Law.

Working hours during Ramadan will be in accordance with announcements made in this regard from time to time.



Personal Appearance

Employees should always use good judgment regarding their appearance. Employees are expected to dress formally and appropriately, to be neat, to wear clean clothing and to be careful of personal hygiene. Deliberate violations of commonly accepted standards of cleanliness or dress may be the cause for disciplinary action.



Public affairs and Government Interactions

At Algozaibi, all public affair activities must be conducted ethically and must align with the relevant local Saudi Arabia anti-bribery laws and the standards outlined in the **Compliance Policies and Procedures Manual**, with reference to the policy on **Interactions with HCPs that are Public Officials**.



Corporate Recordkeeping

We create, retain and dispose of our company records as part of our normal course of business in compliance with all Algozaibi policies and guidelines, as well as all regulatory and legal requirements. All corporate records must be true, accurate and complete, and company data must be promptly and accurately entered in our books following Algozaibi and other applicable accounting principles.



Environment

Employees should consider environment-friendly activities when printing papers or disposing of recyclable items. Algozaibi shall continuously seek to participate in activities that support preserving the environment.



Smoking

Smoking shall be prohibited inside all Algozaibi facilities. Smoking should be exercised outside Algozaibi facilities or in the pre-assigned designated smoking areas. Smoking violations will not be tolerated by any means, and the employee will be subject to disciplinary action up to and including termination.



Use of Company Resources

Company resources, including time, material, equipment and information, are provided for company business use. Nonetheless, occasional personal use is permissible if it does not affect job performance or cause a disruption to the workplace. Employees and those who represent Algozaibi are trusted to behave responsibly and use good



judgment to conserve company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, we will not use company equipment such as computers, copiers and fax machines in the conduct of an outside business or support of any religious, political or other outside daily activity. We will not solicit contributions nor distribute non-work-related materials during work hours.

Questions about the proper use of company resources should be directed to your direct supervisor.

Accountability

Each of us is responsible for knowing and adhering to the values and standards outlined in this Code and for raising questions if we are uncertain about company policies. If we are concerned whether the standards are being met or are aware of violations of the Code, we must contact the Compliance Officer. AlgoSaibi takes the standards outlined in the Code seriously, and violations are cause for disciplinary action up to and including termination of employment.

Disclaimer

AlgoSaibi reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device, the use of the internet or AlgoSaibi's intranet. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, explicit or otherwise offensive or inappropriate.

AlgoSaibi will continue to train its employees on the principles and standards set out in this Code, and the policies and procedures that underpin its operation.

Speaking Up

AlgoSaibi encourages all its employees to speak up in an open environment on any issues or concerns they may have. AlgoSaibi is committed to operating with an open-door policy.

As part of each employee's commitment to this code, you have a duty to report any possible or suspected violations to this code, the applicable laws and regulations as soon as you become aware of them. Employees may raise their concerns in accordance with the **Whistleblowing Policy**.

It is a violation of AlgoSaibi's code for any employee or staff member to subject any person to harassment during any company related activity. Actions constitute harassment if they substantially interfere with another's



employment opportunities, peaceful enjoyment of residence and physical security. Employees are encouraged to speak up to their direct supervisor or senior management if they face any harassment in the work environment.

Non-compliance with this Code or any of its supporting policies, including a failure to report a suspected or known breach, can represent serious misconduct and may result in disciplinary action being taken.

Remember, we at Algosaihi operate with an open-door policy...



Quick Reference Guide

Please find the below policies and procedures available for your reference to be used in conjunction with this Code:

1. Anti-Fraud Policy
2. Compliance Policies and Procedures Manual; Includes Anti-bribery and Corruption, Gifts, Interactions with HCPs who are Public Officials.
3. Conflict of Interest Policy
4. Whistleblowing Policy

Note

Algosaihi will strive to continually ensure its employees act in accordance with and are trained on the values and standards set out in this Code.

This Code, and the policies and procedures supporting it, are the responsibility of the Compliance Officer who always welcomes and appreciates employee feedback.

