

Code of Conduct

Policy Objective

Code of Conduct policy outlines company expectations regarding employees' behaviour towards their colleagues, supervisors and overall organization.

Company Management promotes open communication but expect all employees to follow company's code of conduct. Employees should avoid offending, participating in serious disputes and disrupting the workplace. Management also expect them to foster an organized, respectful and collaborative environment.

Policy Scope

This policy applies to all our employees regardless of position, grade or employment type.

Contents:

1. Compliance with law
2. Respect in the workplace
3. Confidentiality Statement
4. Protection of company property
5. Professionalism and Dress code
6. Gift Policy
7. Cyber security and digital devices
8. Conflict of interest
9. Abuse company provided benefits
10. Abuse of Job duties and authority
11. Employment of relatives
12. Health and Safety Policy
13. Eating/Drugs/Alcohol/Smoking Policies
14. Disciplinary procedure

Item No.1: Compliance with law

All employees must protect the company's legality. They should comply with all environmental, health and safety and labour laws. Management expect employees to be ethical and responsible when dealing with our company's finances, products, partnerships and public image.

Item No. 2: Respect in the workplace

All employees should respect their colleagues. Company won't allow any kind of discriminatory behaviour, harassment or victimization. Employees should conform with our code of conduct policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations.

Item No. 3: Confidentiality Statement

The employee represents and warrants that he shall conduct his personal and business affairs in a manner that does not result in the disclosure of confidential or Proprietary Information of the Employer to competitors or the public. The obligation of confidentiality shall survive the expiration or termination of this Contract.

Item No. 4: Protection of Company Property

All employees should treat the company's property, whether material or intangible, with respect and care.

- Employee should not misuse company equipment or use it without care.
- Employee should respect all kinds of incorporeal property. This includes trademarks, copyright, and other property (information, reports etc.)
- Employee should use company properties only to complete his/her job duties especially company cars.

Employees should protect company facilities and other material property including: company cars, equipment, machines, computer, lap tops, copying machines, telephones, etc from damage and vandalism, whenever possible.

Any damage cause to any property of the Company by an employee intentional or by negligence will result in pecuniary penalization along with any other disciplinary action as per Bahrain Labour Law.

All employees shall allow security for personal inspection as per need when entering or exiting the premises, its not allowed to takeout any material with any value out of company premises without an approval from Head of department.

Item No. 5: Professionalism and Dress Code

All employees must show integrity and professionalism in the workplace as follows:

- **Dress code**

All employees must follow company dress code and personal appearance guidelines. All employees are expected to wear appropriate attire for the workplace based on their area of work and dress requirements.

Office employees are required to dress up in formals during working hours. They must dress smartly and in a neat and well-presented manner at all times. A professional appearance is essential to a favourable impression on business associates. Slippers, sandals and cut jeans are not allowed. For meetings with clients and for formal activities when representing the company, formal dress code is a must.

The following clothing is appropriate for the workplace:

- Formal Clothing
- National Dress- for office staff only and cannot be used by Farms or Security staff

Employees working in the farms are provided with suitable number of uniforms including safety shoes as per company internal policy.

If employee fails to meet the standards dress code of the Company, disciplinary action will be taken against the employee.

- **Attendance Policy**

Employees should follow their working hours and weekly off schedules. Generally, Management expect employees to be punctual when coming to and leaving from work.

- The employer shall set the dates of the annual leaves in accordance with the requirements and circumstances of the work. The worker shall take his leave on the date and for the period set by the employer with the obligation to submit the leave request in advance.

- For office staff including: Finance, Purchase and HR & Admin Departments, half an hour flexi timing is allowed, and the late attendance time should be compensated.
- There is no flexi timing for staff working in operations including: Farms, Stores, Maintenance and Security as all the activities are time bound.
- Every employee shall notify his/her supervisor by phone call of an anticipated absence or reason for not attending to work within the first hour of office hours, maximum.
- Sleeping or loafing on the job is prohibited.
- Employee shall not bring any visitor to their workplace or elsewhere on Company premises during the employee's working hours without obtaining prior approval from Company's management when such accompaniment might interfere with the discharge of the employee's duties and responsibilities.
- No employee shall bring any kind of weapons while on Company premises.

Item No. 6: Gift Policy

Management discourage employees from accepting gifts from clients or partners. Management prohibit briberies for the benefit of any external or internal party.

Management expect employees to avoid any personal, financial or other interests that might affect their capability or willingness to perform their job duties.

Customers/vendors/outside parties may occasionally offer staff gifts. Any cash or items valued at more than BD 50 in addition to gifts valued at 20 and up to 50 BD must be tactfully refused. All gifts and offers must be reported to the HR & Admin Manager and CEO.

Employees may accept unsolicited gifts, other than money, that conform to the reasonable ethical practices of the marketplace, including:

- Flowers, fruit baskets and other modest presents that commemorate a special occasion.
- Gifts of nominal value, such as calendars, pens, mugs, caps and t-shirts (or other novelty, advertising or promotional items).
- For Gifts value less than BD20/-: to be declared to HR by filling a form.

Employees with questions about accepting business courtesies should talk to their managers or the HR & Admin department.

Item No.7: Cyber security and digital devices

This section deals with all things digital at work. Company set some guidelines for using computers, phones, company internet connection and social media to ensure security and protect company assets.

1. Internet usage

Corporate internet connection is primarily for business and it should not be used for personal purposes.

Employees must not use company internet connection to:

- Download or upload obscene, offensive, or illegal material.
- Send confidential information to unauthorized recipients.
- Invade another person's privacy and gain access to sensitive information.
- Visit potentially dangerous websites that can compromise our network and computers' safety.
- Perform unauthorized or illegal actions, like hacking, fraud or buying/selling illegal goods.

2. Cell phone

Use of mobile phones should be very limited during working hours and use of devices should not distract employees from performing their usual duties or disrupt workplace. Employees are requested to follow the following rules:

- Use of mobile phone should be in a manner that benefits employee work (business calls, productivity apps, calendars.)
- Employee should keep personal calls brief and use an empty room or common area so as not to disturb his/her colleagues.
- Employee should avoid playing games on his/her phone or texting excessively.
- Employees should not use his/her phone for any reason while driving a company vehicle.
- Employees are not allowed to use their phone to record confidential information.
- Employees should not download or upload inappropriate, illegal or obscene material using corporate internet connection.

3. Corporate email

Employee should use company email primarily for work.

General expectations

Employee is expect to avoid:

- Signing up for illegal, unreliable, disreputable or suspect websites and services.
- Sending unauthorized marketing content or emails.
- Registering for a competitor's services, unless authorized.
- Sending insulting or discriminatory messages and content.
- Spamming other people's emails, including co-workers.

In general, employee should use strong passwords and be vigilant in catching emails that carry malware or phishing attempts.

4. Social media

The following social media usage guidelines is provided to prevent careless use of social media in the company workplace. Two types of social media use will be addressed:

1. using personal social media at work
2. representing company through social media.

Using personal social media at work

- Employee is expected to act responsibly, according to company policies and ensure that he/she stay productive. Specifically, employee is requested to:
- Avoid getting side-tracked by social platforms.
- Ensure others know that employee personal account or statements do not represent company.
- Avoid sharing intellectual property for example trademarks or confidential information. Ask Management first before sharing company news that is not officially announced.
- Avoid any offensive content. Employee may violate company's policy if he/she direct such content towards colleagues, clients, or partners.

5. Personal Data Protection

All employees must comply with local data protection law and all of its updates. Personal data is defined under the PDPL as any information of any form related to an identifiable individual, or an individual who can be identified, directly or indirectly, particularly through their personal identification number, or one or more of their physical, physiological, intellectual, cultural or economic characteristics or social identity.

Sensitive personal data is a subset of personal data. It is personal data which reveals, directly or indirectly, the individual's race, ethnicity, political or philosophical views, religious beliefs, union affiliation, criminal record or any data related to their health. Sensitive personal data requires more rigorous treatment by data controllers.

Employees are not allowed to

- process sensitive personal data in violation of the PDPL;
- transfers personal data outside Bahrain to a country or region in violation of the PDPL;
- process personal data without notifying the Authority;
- fails to notify the Authority of any change made to the data of which they have notified the Authority;
- process certain personal data without prior authorization from the Authority;
- submit to the Authority or the data subject false or misleading data to the contrary of what is established in the records,
- Misuse data or documents available at their disposal;
- withholds from the Authority any data, information, records, or documents which they should provide to the Authority or
- enable it to review them in order to perform its missions specified under the PDPL;
- causes to hinder or suspend the work of the Authority's inspectors or any investigation which the Authority is going to
- make; and / or discloses any data or information which they are allowed to have access to, due to their job or which they used for their
- own benefit or for the benefit of others unreasonably and in violation of the provisions of the PDPL.

Data controllers are prohibited from processing the following personal data types without the prior written authorization of the Authority:

- automatic processing of sensitive personal data of data subjects who cannot provide consent;
- automatic processing of biometric data;
- automatic processing of personal data files that are in the possession of two or more data controllers that are processing

- personal data for different purposes; or processing that consists of visual recording to be used for monitoring purposes.

Item No.8: Conflict of Interest

The Employee shall not be engaged or employed by a third party whether during his leave or holidays or at any other time during the course of his/her contract without the prior written consent of the Employer. When employee is experiencing a conflict of interest, his/her personal goals are no longer aligned with towards company.

Examples:

1. Accepting a bribe
2. Accepting gifts

If employee is aware of such behaviour, he/she will lose his/her job and may face legal issue. For this reason, conflicts of interest are a serious issue for all employees. Management expect employees to be alert to spot circumstances that create conflicts of interest, either to yourself or for your direct reports. Employee should follow company policies and always act in our company's best interests. Whenever possible, employee should not let personal or financial interests get in the way of his/her job. If employee is experiencing an ethical dilemma, he/she talk to line manager or HR.

During the Contract Period and for a period of twelve (12) months following any termination or resignation or cessation of employment for any other reason, the employee covenants with the employer that he/she will not in connection with the carrying on of any business relating to the employer's business activities, either on his/her own behalf or on behalf of any person, employer or company, directly or indirectly:

1. seek to procure instructions from or act on behalf of any person, firm or company for whom the Employee has carried out work in the employment of the Employer during the period of twelve (12) months immediately preceding such termination;
2. solicit or entice or endeavour to solicit or entice away any employee of the Employer whether or not such employee would commit any breach of his contract of employment by reason of leaving the service of the Employer; or
3. employ any person employed by the Employer who was so employed at any time in the twelve (12) month period prior to the termination of the employment under this Contract.

4. For all staff:

- It is not allowed to trade with company product for own interest whether during working hours or outside working hours.
- It is not allowed to trade with competitor companies products as long as employee is on service whether during working hours or after working hours

Item No.9: Abuse company provided benefits

Management expect employees to not abuse their employment benefits. This can refer to time off, insurance, facilities, subscriptions or other benefits our company offers.

Item No. 10: Abuse of Job duties and authority

All employees should fulfil their job duties with integrity and respect toward customers, stakeholders and the community. Supervisors and managers mustn't abuse their authority such as using them to do their personal business or insulting them in any way. Management expect Managers to delegate duties to their team members taking into account their competences and workload. Likewise, Management expect team members to follow team leaders' instructions and complete their duties with skill and in a timely manner.

Management encourage mentoring throughout our company.

Item No.11: Employment of Relatives

Recruitment of relatives is not allowed as per company policy. During recruitment process, application form needs to be completed and declaration need to be signed in case employee has any relatives working in the company. If employee provided any false information or hide existence of relatives working in the company, it will lead to dismissal and denial of access to the job.

Item No. 12: Health and Safety

General Safety Rules

1). **Housekeeping for all around company premises**

- Keeping the work areas clear and free from obstruction.
- Keeping passages and walkways clear and free from obstruction.

- Keeping fire points and emergency exits clear and free from obstruction.
- Ensuring spillages are cleaned up immediately.
- Providing warning markers/cones when cleaning is being carried out and the floors are wet.

2). **Electricity**

- Not attempting to repair or modify any electrical equipment unless specifically authorized to do so.
- Reporting any damaged or unlabelled electrical appliance immediately to the reporting manager.
- Not using socket adapters unless approved by the reporting manager.
- Only using electrical equipment that carries an inspection label.

3). **Fire Safety**

- On hearing the alarm evacuating the premises in a safe and orderly fashion.
- Not stopping to search for or collect personal belongings.
- Not stopping to search for other people.
- Assembling at designated fire points for roll call.
- Do not at any time try to re-enter the building unless told to do so by the fire brigade.

Item No. 13: Eating/Drugs/Alcohol/Smoking Policies

Food as well as drinks is allowed to take in the pantry only.

Smoking is strictly not permitted in the office premises and around the farm.

The Company emphasizes that it is illegal to drive or work under the influence of alcohol in Bahrain. In the event of an accident where an employee is found guilty of driving under such influence, the employee and not the Company will be held responsible for any accident-related costs arising from employee's actions. Employees are therefore strongly encouraged to make use of taxis or public transport and not to drive a vehicle whilst under alcohol influence.

The misuse of alcohol and drugs can put the health, safety and welfare of employees at risk. It can result in poor performance at work, reduced efficiency and poor decision making. Being under the influence of alcohol or narcotic drugs whilst on Company's business can lead to disciplinary action which may include summary dismissal.

Item No. 14: Disciplinary actions

Our company may have to take disciplinary action against employees who repeatedly or intentionally fail to follow our code of conduct. Disciplinary actions will vary depending on the violation. Company follow disciplinary procedure as per Labour law (pls. refer to attached table)

Any complain has to be addressed to the Head of department, the head of department should take an immediate action to forward this complain to the HR department

Possible consequences include:

- Verbal or written warnings
- Demotion.
- Suspension or termination for more serious offenses.
- Detraction of benefits for a definite or indefinite time.
- Management may take legal action in cases of corruption, theft, embezzlement or other unlawful behaviour.
- Written warning letters will impact the employee's annual/biannual appraisal as per the following table:

#	Subject of Warning/Disciplinary action	Severity	Weight
1	Attendance: Late attendance/ early leaving/ absenteeism	Low : (if no impact on overtime rate) Medium: if impacts overtime rate High: if repeated over 2 months or more	1 2 3
2	Not following HSE measures including safety shoes	High	3
3	Not following instructions of Line Manager related to work flow (verbal or written instructions)	High	3
4	Smoking or drinking in company premises	High	3
5	Sleeping in company premises	High	3
6	Misusing company owned equipment, tools, materials Using company owned equipment, tools, materials for personal use	High	3
7	Fighting with co-workers or line Managers or Management members	High	3
8	Refusal to work OT	High	3
9	Not wearing uniform	Occasionally: Medium Frequently: High	2 3
10	Stealing or embezzlement	High	3

11	Other violations	To deal with it case to case	Based on nature of violation
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Guide to Warning Weight

Weight	Impact
1	Low
2	Medium
3	High

Guide to Impact on Employee Appraisal Score

Weight	Impact on Appraisal Score
1	≤ 25%
2	≤ 50%
3	≤ 75%

(Disciplinary action table is attached)

Type of Contravention	Disciplinary Action (Percentage of Penalty to be deducted from the daily wage)				
	First Time	Second Time	Third Time	Fourth Time	Notices
First: Contraventions related to the business hours.					
1. Arriving up to 15 minutes late without permission or acceptable excuse if such lateness does not delay the work of other workers.	Verbal notice	Written warning	5%	10%	
2. Arriving up to 15 minutes late without permission or acceptable excuse if such lateness delays the work of other workers.	Verbal notice	Written warning	25%	50%	
3. Arriving more than 15 minutes but not more than 30 minutes late without permission or acceptable excuse if such lateness does not delay the work of other workers.	Written warning	15%	25%	50%	
4. Arriving more than 15 minutes but not more than 30 minutes late without permission or acceptable excuse if such lateness delays the work of other workers.	Written warning	50%	75%	1 Day	
5. Arriving more than 15 minutes but not more than 60 minutes late without permission or acceptable excuse if such lateness does not delay the work of other workers.	25%	50%	75%	1 Day	
6. Arriving more than 15 minutes but not more than 60 minutes late without permission or acceptable excuse if such lateness delays the work of other workers.	30%	50%	75%	2 Days	
7. Arriving more than one hour late without permission or acceptable excuse, whether such lateness does not delay the work of other workers.	Written warning	1 Day	2 Days	3 Days	In addition to deducting the hours of lateness
8. Leaving work early without permission or accepted excuse by no more than 15 minutes.	Written warning	10%	25%	1 Day	
9. Leaving work early without permission or accepted excuse by more than 15 minutes.	Written warning	10%	25%	1 Day	In addition to deducting the time of early leaving
10. Staying in the workplace or returning to it after working hours without justifiable reason.	Written warning	10%	25%	1 Day	

Type of Contravention	Disciplinary Action (Percentage of Penalty to be deducted from the daily wage)				
	First Time	Second Time	Third Time	Fourth Time	Notices
Secondly: Contraventions related to the work organization.					
1. Exiting from non-designated exit.	Verbal notice	Written warning	15%	25%	
2. Receiving outside visitors at the workplace without permission from the management.	Verbal notice	Written warning	15%	25%	
3. Eating at non-designated areas or at non-designated hours.	Verbal notice	Written warning	15%	25%	
4. Sleeping during the working hours.	Verbal notice	Written warning	25%	50%	
5. Using the workplace telephone for personal purposes without permission	Verbal notice	Written warning	25%	50%	
6. Rambling or not being available at the work location during work hours.	10%	25%	50%	1 Day	
7. Fraud in proving attendance	25%	50%	1 Day	2 Days	
8. Disobedience of the instructions received from the superior	25%	50%	1 Day	2 Days	
9. Failure to implement work regulations provided that such regulations are clearly displayed at the workplace.	25%	50%	1 Day	2 Days	
10. Sleeping in such a situation that requires constant vigilance.	50%	1 Day	2 Days	3 Days	
11. Inciting others to breach orders and instructions.	2 Days	3 Days	5 Days	Termination from Service	
12. Negligence and laxity in performance that may lead to harm the safety of workers or health or cause damage to the materials or equipment of the company.	2 Days	3 Days	5 Days	Termination from Service	
13. Smoking in non-smoking areas or having alcoholic drinks at the workplace.	2 Days	3 Days	5 Days	Termination from Service	Termination may be applied if a serious damage was caused

Type of Contravention	Disciplinary Action (Percentage of Penalty to be deducted from the daily wage)				
	First Time	Second Time	Third Time	Fourth Time	Notices
Thirdly: Contraventions related to the worker's behavior:					
1. Collecting donations or money without permission.	Verbal notice	10%	25%	50%	
2. Writing or posting ads on the walls or defacing the walls of the workplace.	Verbal notice	Written warning	25%	50%	
3. Excessive use of raw materials without justification.	Written warning	50%	1 Day	2 Days	
4. False claim against superiors/colleagues or ganging up against the company that leads to the disruption of work.	25%	50%	1 Day	2 Days	
5. Refusal of the leave-check.	25%	50%	1 Day	2 Days	
6. Violating the health instructions at the workplaces.	50%	1 Day	2 Days	5 Days	
7. Using the work machine, tools, or materials for personal purposes or for non-assigned purposes.	1 Day	2 Days	3 Days	5 Days	
8. Quarreling with colleagues and cause disturbance at the workplace.	1 Day	2 Days	3 Days	5 Days	
9. Malinger.	1 Day	2 Days	3 Days	5 Days	
10. Refusal to undergo the physical check-up required by the company's doctor.	1 Day	2 Days	3 Days	5 Days	
11. Non-delivery of the money collected for the company on time without justification.	2 Days	3 Days	5 Days	Termination from Service	
12. Violation of the local work instructions.	2 Days	3 Days	5 Days	Termination from Service	
13. Non-wearing the uniform.	Verbal notice	Written warning	10%	25%	
14. Failure to accomplish the training & development program.	Written warning	10%	25%	50%	
15. Refusal to attend the overtime working hours.	Verbal notice	Written warning	25%	50%	
16. Concluding bargains, selling, buying, or promoting goods at the workplace.	Written warning	10%	25%	50%	

17. Leaving important information on desk unattended.	Verbal notice	Written warning	25%	50%	
18. Leaving important information on the printer or the fax machine unattended.	Verbal notice	Written warning	25%	50%	
19. Destroying the back-up copies of data without permission.	Written warning	10%	25%	50%	
20. Not reporting the incident of theft of computers and its accessories.	Written warning	10%	25%	50%	
21. Not exiting from the network and closing the computer while going outside the office, unless otherwise required.	Verbal notice	Written warning	25%	50%	
22. Misusing the office email.	Verbal notice	Written warning	25%	50%	
23. Insulting superiors/officials and mudslinging them through whatsoever mean.	Written warning	10%	25%	50%	

Employee Name: _____

Staff No.: _____

Employee Signature: _____

Date: _____