

# **Malia Group**

## **Code of Ethics**

### **Short Version For Publication**

**This is the Short Version of the Code of Ethics and Conduct of Malia Group.  
The Ethics Principles have been retained in this version for publication purposes.**

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## 1- Definition of the Code of Ethics

The Code of Ethics defines the Ethical Principles adopted at Malia Group that shall rule the conduct of stakeholders.

The Ethical Principles stemming from the Group's key values are as follows:

- Safeguarding the Group's assets
- Promoting Sustainability and Growth
- Adopting Fair Practices and Consumer Protection requirements
- Complying with laws, regulations, standards and obligations.

Additionally, Malia Group is a participant to the United Nations Global Compact initiative and voluntarily complies with and promotes its 10 principles, which are derived from the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption. They are as follows:

### Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and  
Principle 2: make sure that they are not complicit in human rights abuses.

### Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;  
Principle 4: the elimination of all forms of forced and compulsory labour;  
Principle 5: the effective abolition of child labour; and  
Principle 6: the elimination of discrimination in respect of employment and occupation.

### Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;  
Principle 8: undertake initiatives to promote greater environmental responsibility; and  
Principle 9: encourage the development and diffusion of environmentally friendly technologies.

### Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

## 2- Scope of Application of the Standards

As a general principle, the Ethics rules apply to the following:

- 1- All members of the Group. None is authorized to violate them
- 2- All members of affiliates with non-controlling interest, to the extent possible
- 3- Other Stakeholders, to the extent possible

## 3- General Rules of Compliance and Application

The Code of Ethics shall be observed at the workplace.

### Reporting/Cooperation

- All violations shall be reported to the competent authorities
- Full cooperation in any investigation shall be carried out
- It is strictly forbidden to cover up any violation

## Manager-Specific Rules

Managers shall:

- Notify their subordinates of the laws and the Code of Ethics applicable to their line of work.
- Take serious action towards preventing any violation of the law or Code of Ethics, covering remedy and reporting employee security

## Penalties of Non-Compliance

In general, breaches, non-compliance and information withholding subject employees to penalties that may reach up to termination of employment. Other Penalties may include criminal and/or civil sanctions

## Reporting Procedure

Violations may be reported to direct and indirect managers and officers from finance, accounting, internal monitoring, human resources, security, in addition to Group lawyers, Chief Officers, the Corporate Secretary and the mediator.

## Exemptions from the Code of Ethics

Authorized exemptions are possible where the laws or the interests of the Group permit.

# 4- General Ethical Rules for Business Conduct

When always striving to act according to the best accepted rules of behavior and complying with all applicable principles described in this Code, one should always consider the following before making any decision:

- Is the action I am about to carry out the right thing to do?
- Will I feel comfortable if the action I am about to carry out were announced publicly?
- Will the action I am about to carry out preserve the Group's reputation?
- Will I still be trustworthy and will my attitude reflect my honesty?

# 5- Ethics Principles

## A- Performance Quality

<b>Topic</b>	<b>Compliance with laws</b>
<b>Principle</b>	Employees shall comply with applicable laws in the performance of their duties.

<b>Topic</b>	<b>Books and Records</b>
<b>Principle</b>	Books and records shall be accurate, up-to-date and complete. No deliberately inaccurate information is permitted, otherwise may expose authors to sanctions. This applies to employee forms, operations, financials, filings, publications and any documents containing information about the Group.

<b>Topic</b>	<b>Reporting and Disclosure</b>
<b>Principle</b>	Reporting is the act of relaying information to the competent authority. Disclosure is the act of making information known to a specific audience. The governing principle is to report and disclose in a manner to promote and safeguard the Group's interest and enable the receiver of the information to act upon it properly.

<b>Topic</b>	<b>Compliance to Quality Management</b>
<b>Principle</b>	Employees shall perform their duties in full compliance with quality management systems. This covers compliance to policies, procedures and processes on the execution of operations efficiently and the safeguard of the Group's assets.

## B- Conduct at the Workplace

<b>Topic</b>	<b>Non-acceptable behavior: Harassment / Discrimination / Violence</b>
<b>Principle</b>	Nothing in the behavior, policies, procedures or any aspect of the Group shall be interpreted as an exception to the principle of prohibition of discrimination, harassment and violence.  Any incident involving discrimination, harassment or violence shall be reported. Corrective measures shall be taken and non-retaliation shall be ensured.

<b>Topic</b>	<b>Respect</b>
<b>Principle</b>	Mutual respect among employees is one of the key principles adopted at the Group. The Group shall not allow any employee to treat others rudely or engage in behavior bespeaking disrespect.

<b>Topic</b>	<b>Hygiene</b>
<b>Principle</b>	The Group considers hygiene as a priority. Hygienic conditions and practices help maintain health and prevent the spread of diseases. It affects as well the reputation of the Group.

<b>Topic</b>	<b>Substance Abuse</b>
<b>Principle</b>	The Group shall not be lenient with any employee proven to abuse alcohol or drugs in a way that may affect his performance or the reputation of the Group.

<b>Topic</b>	<b>Interviews</b>
<b>Principle</b>	Interviews shall be conducted professionally and suitably.

<b>Topic</b>	<b>Property of the Group</b>
<b>Principle</b>	The property of the Group shall be preserved and properly handled.

<b>Topic</b>	<b>Computer and Internet Access and Security</b>
<b>Principle</b>	Any person accessing the Group's computers and internet shall do so for professional purposes and in a secure manner. Permissions to access the internet are set in the related policy. The governing principle is the professional, legal, ethical and secure use.

## C- Bribery and Illegal Business Dealings

<b>Topic</b>	<b>Bribery</b>
<b>Principle</b>	Bribery is strictly forbidden.  Bribery is the act of giving Group clients or suppliers (or their representatives) any personal payment, bribe or commission, or receiving the same based on the belief that this will induce more profitable business conditions or opportunities than usual.

<b>Topic</b>	<b>Illegal Payments to Civil Servants/Politically Exposed Persons/Political Parties</b>
<b>Principle</b>	The Group prohibits all illegal payments to civil servants/Politically Exposed Persons/Political Parties, direct or indirect, in cash or any other form of valuables, made for profit, facilitation, favors, and others.

<b>Topic</b>	<b>Money Laundering and Distribution Line Deviation</b>
<b>Principle</b>	Money Laundering and Distribution Line Deviation are prohibited by the Group.

	<p>Money laundering is the process of taking the proceeds of criminal activity and making them appear legal.</p> <p>Product distribution line deviation is the act of selling products on markets or to clients other than those originally specified, violating contractual, legal or regulatory provisions.</p>
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## D- Confidentiality

<b>Topic</b>	<b>Confidentiality of information</b>
<b>Principle</b>	<p>Employees commit to safeguarding the confidentiality of all information of a sensitive nature. It is understood that by sensitive nature, information the disclosure of which may materially expose the company to risks of any type, notably financial, strategic and reputational. Confidentiality of information survives the employment until public disclosure by the Employer of said information.</p> <p>The Group shall not pressure employees to disclose confidential information they possess from previous employment.</p>

## E- Conflict of Interest

<b>Topic</b>	<b>Business, Financial and Personal Relationships</b>
<b>Principle</b>	<p>Employees represent and warrant that they have no business, professional, personal, or other interest, including, but not limited to, the representation of other clients, that would conflict in any manner with the performance of their obligations with the Group.</p>

## F- Consumer Protection and Honest Dealing

<b>Topic</b>	<b>Consumer Protection: Quality</b>
<b>Principle</b>	<p>Consumer Protection is at the heart of Malia Group's concerns. The Group engages to provide products of the highest quality free from hidden defects.</p>

<b>Topic</b>	<b>Consumer Protection: Advertising</b>
<b>Principle</b>	<p>Consumer Protection is at the heart of Malia Group's concerns. The Group prohibits deceptive information on products and services by advertising fairly and transparently.</p>

<b>Topic</b>	<b>Dealing with Clients</b>
<b>Principle</b>	<p>The Group does not discriminate clients based on the size or type of their transactions with the Group, or the business channel or strategy.</p>

<b>Topic</b>	<b>Dealing with Suppliers</b>
<b>Principle</b>	<p>The Group allows suppliers to compete for its business based on the overall value offered to the Group by the supplier.</p>

## G- Endorsement

<b>Topic</b>	<b>Political Endorsement</b>
<b>Principle</b>	<p>The Group does not make contributions of any type to politically exposed persons in view of acquiring or maintaining business.</p> <p>The Group, being a market leader, may lobby for public policy and legislation that improves the business environment, and consequently the Group's growth.</p>

## H- Privacy

<b>Topic</b>	<b>Privacy</b>
<b>Principle</b>	Employees, in addition to complying with legal rules on privacy, shall endeavor to protect the personal data of individuals acquired while conducting business. This covers personal data from consumers, suppliers, clients, employees, applicants, and others.

## I- Health, Safety and Environment

<b>Principle</b>	<b>Product Safety</b>
<b>Definition</b>	<p>Safety is a priority.</p> <p>It shall be ensured in containers and products for consumer use and in operations for employees, neighbors and the environment.</p> <p>Group products shall meet or exceed laws and regulations on safety</p> <p>The Group shall disclose truthfully the information regarding the safety of the product and containers.</p>

<b>Principle</b>	<b>Employees Safety</b>
<b>Definition</b>	The Group endeavors to create a healthy and safe environment for its employees. No reason justifies disregarding practices ensuring the safety of employees, even emergency operational needs.

<b>Principle</b>	<b>Environment Quality</b>
<b>Definition</b>	The Group works continuously on enhancing the quality of the environment by abiding to related laws and standards.