

Code of Conduct

Alkon Contracting Company – Kingdom of Saudi Arabia

Website Display Version (Summary)

This Code of Conduct defines the ethical, professional, safety, and quality standards governing all activities of **Alkon Contracting Company**. It reflects our commitment to Saudi regulations and alignment with **ISO 37001 (Anti-Bribery)**, **ISO 45001 (HSE)**, and **ISO 9001 (Quality)**.

Our Commitments

- Ethical and transparent business practices
- Zero tolerance for bribery and corruption
- Safe and healthy workplaces
- High-quality project delivery
- Legal and regulatory compliance
- Respect for people, communities, and the environment

Detailed Policy Framework

1. Purpose and Scope

This Code of Conduct outlines the ethical standards, professional behavior, and legal compliance requirements expected from all employees, managers, directors, consultants, subcontractors, and business partners of **Alkon Contracting Company** (“Alkon”).

The Code applies to all operations, projects, and business activities conducted within the Kingdom of Saudi Arabia and internationally, where applicable.

2. Core Values

Alkon is committed to conducting its business based on the following core values: -
Integrity and honesty - Compliance with laws and regulations - Health, safety, and environmental responsibility - Professionalism and accountability - Respect for people and communities - Quality, excellence, and sustainability

3. Compliance with Laws and Regulations

All employees and representatives must comply with: - Laws and regulations of the Kingdom of Saudi Arabia - Applicable international laws and standards - Government, client, and contractual requirements - Saudi labor law, commercial law, and anti-corruption regulations

No employee is permitted to engage in activities that violate legal or regulatory requirements.

4. Ethics and Integrity

ISO Alignment Overview

This Code of Conduct is aligned with the requirements and principles of the following international management system standards: - **ISO 37001: Anti-Bribery Management Systems** - **ISO 45001: Occupational Health and Safety Management Systems** - **ISO 9001: Quality Management Systems**

Alkon Contracting Company is committed to implementing controls, procedures, and continuous improvement mechanisms consistent with these standards.

4.1 Honest Business Practices

- Conduct all business dealings fairly, transparently, and ethically
- Prohibit fraud, misrepresentation, or deceptive practices
- Maintain accurate books, records, and reports

4.2 Anti-Bribery and Anti-Corruption

Alkon strictly prohibits: - Bribery, kickbacks, facilitation payments, or improper advantages - Offering or accepting gifts, hospitality, or payments that could influence business decisions - Any form of corruption in dealings with government entities, clients, or suppliers

5. Conflicts of Interest

Employees must avoid situations where personal interests conflict, or appear to conflict, with Alkon's interests. This includes: - Financial interests in suppliers, subcontractors, or competitors - Personal relationships influencing business decisions - Outside employment that interferes with job responsibilities

Any actual or potential conflict must be disclosed to management immediately.

6. Health, Safety, and Environment (HSE) – ISO 45001 Alignment

Alkon operates an Occupational Health and Safety Management System aligned with **ISO 45001** to eliminate hazards, reduce OH&S risks, and provide safe and healthy workplaces.

All employees and contractors must: - Comply with HSE policies, risk assessments, and method statements (RAMS) - Participate in safety inductions, toolbox talks, and HSE training - Use personal protective equipment (PPE) as mandated - Stop work and report unsafe acts, conditions, incidents, and near-misses - Cooperate with incident investigations and corrective actions

Management is responsible for: - Providing safe working conditions and resources - Consulting and involving workers in HSE matters - Ensuring emergency preparedness and response plans are implemented

Safety performance is monitored, audited, and continually improved.

Alkon is committed to providing a safe and healthy work environment.

All employees must: - Follow HSE policies, procedures, and site safety rules - Use personal protective equipment (PPE) as required - Report unsafe conditions, incidents, and near-misses - Protect the environment and minimize environmental impact

Safety is a shared responsibility and a core priority in all projects.

7. Workplace Conduct and Human Rights

7.1 Respect and Non-Discrimination

Alkon promotes a workplace free from: - Discrimination based on nationality, gender, religion, age, or disability - Harassment, abuse, intimidation, or retaliation

All employees must treat colleagues, clients, and partners with dignity and respect.

7.2 Labor Practices

- No forced labor or child labor is permitted
- Fair wages, working hours, and lawful employment practices must be followed
- Employees' rights under Saudi labor law must be respected

8. Confidentiality and Data Protection

Employees must:

- Protect confidential, proprietary, and sensitive information
- Use company information only for legitimate business purposes
- Comply with data protection and cybersecurity requirements

Confidential obligations continue even after employment ends.

9. Company Assets and Resources

- Company assets must be used responsibly and for authorized business purposes only
- Theft, misuse, or damage to company property is strictly prohibited
- Information systems and digital resources must be used in accordance with IT policies

10. Quality and Professional Standards – ISO 9001 Alignment

Alkon maintains a Quality Management System aligned with **ISO 9001** to ensure consistent delivery of projects that meet customer, statutory, and regulatory requirements.

Employees must:

- Follow approved procedures, work instructions, and inspection test plans (ITPs)
- Ensure quality objectives are understood and achieved
- Identify and report non-conformities
- Support corrective and preventive actions
- Focus on customer satisfaction and continuous improvement

Quality performance is measured through audits, KPIs, client feedback, and management reviews.

Alkon is committed to delivering projects that meet the highest standards of:

- Quality
- Engineering and construction best practices
- Client specifications and contractual obligations

Employees must perform their duties competently and diligently.

11. Reporting Violations and Whistleblowing – ISO 37001 Alignment

In line with **ISO 37001**, Alkon has established confidential and secure reporting mechanisms for concerns related to bribery, corruption, unethical conduct, safety, or quality issues.

Employees and stakeholders are encouraged to report: - Suspected bribery, corruption, or facilitation payments - Violations of this Code or company policies - Legal, safety, environmental, or quality breaches

Reports can be made in good faith without fear of retaliation. Any form of retaliation is strictly prohibited and will result in disciplinary action.

Employees are encouraged to report: - Suspected violations of this Code - Illegal or unethical behavior - Safety, environmental, or compliance concerns

Reports may be made confidentially without fear of retaliation. Retaliation against anyone who raises a concern in good faith is strictly prohibited.

12. Disciplinary Action and Corrective Action

Violations of this Code, ISO-related procedures, or legal requirements may result in: - Disciplinary measures in accordance with Saudi Labor Law - Corrective and preventive actions (CAPA) - Suspension or termination of employment or contracts - Reporting to authorities where legally required

Disciplinary actions are applied consistently and fairly.

Violations of this Code of Conduct may result in disciplinary action, including: - Warnings - Suspension - Termination of employment or contracts - Legal action, where applicable

13. Responsibilities, Leadership, and Continuous Improvement

Leadership Commitment

Top management demonstrates leadership and commitment by: - Promoting ethical behavior and a zero-tolerance approach to bribery - Ensuring adequate resources for HSE, quality, and compliance - Reviewing system performance and improvement opportunities

Employee Responsibilities

All employees and representatives are responsible for: - Understanding and complying with this Code and related management systems - Completing required training and awareness programs - Reporting concerns and improvement opportunities

Acknowledgment

Employees may be required to sign an acknowledgment confirming their understanding of and commitment to this Code of Conduct and Alkon's management systems.



Approved by: Management of Alkon Contracting Company

Effective Date: _____

Version: 1.1 (ISO-Aligned)

All employees and representatives are responsible for: - Understanding and complying with this Code - Seeking guidance when uncertain - Upholding Alkon's reputation and values

Employees may be required to sign an acknowledgment confirming their understanding and commitment to this Code of Conduct.

Approved by: Management of Alkon Contracting Company

Effective Date: _____

Version: 1.0