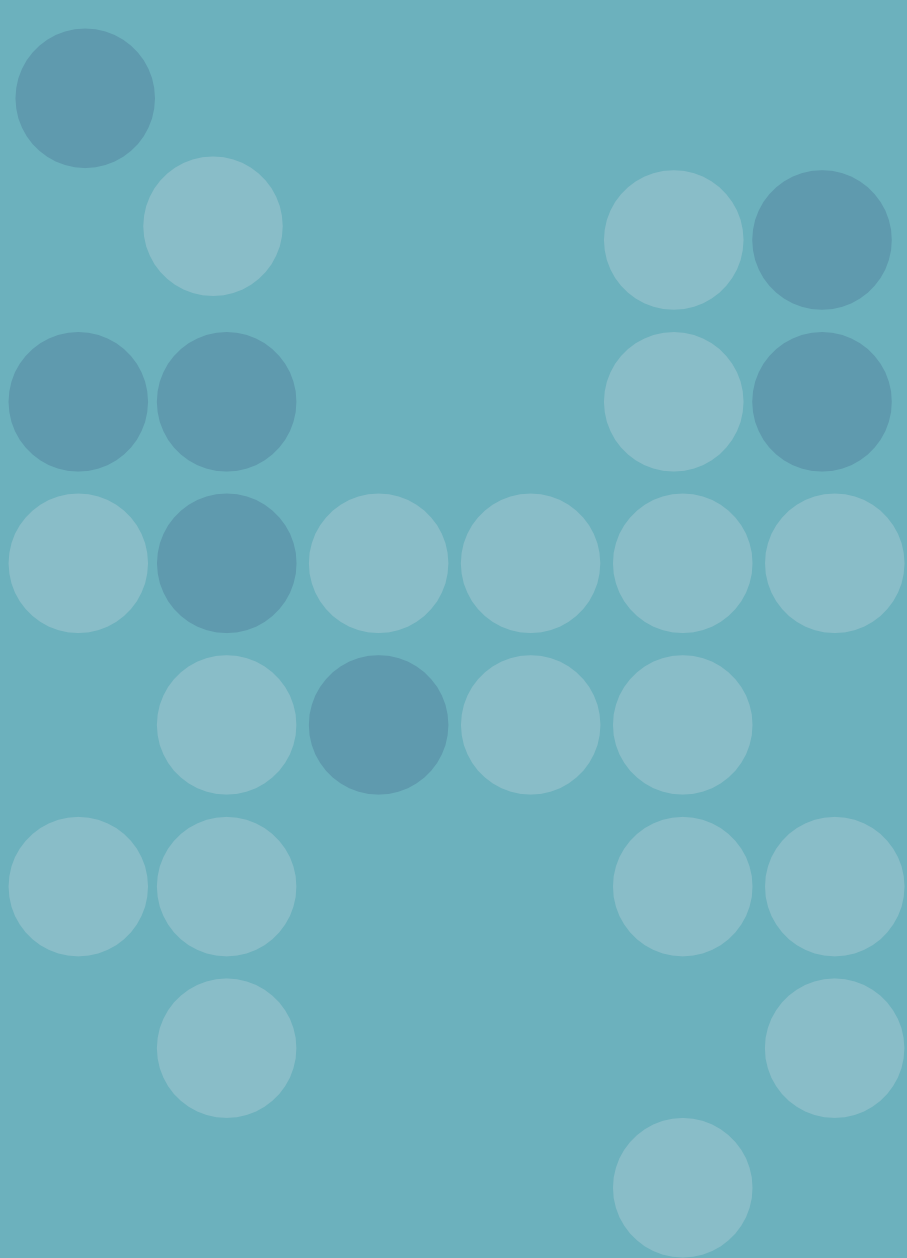


# CODE OF ETHICS AND BUSINESS CONDUCT

Hiwa Rauf Investment & Development Co. Ltd (HRID)

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## 1. Introduction

### 1.1 Purpose

- Demonstrate the company's commitment to the highest standards of ethical behavior.
- Encourage proper ethical conduct and sanction misconduct within the company.
- Develop an ethical culture based on such standards and conduct, led by the company's shareholders, directors, and management, and followed by all employees.

### 1.2 Commitment to Ethical Standards

- This code goes beyond the legal and regulatory framework prevalent in Iraq today and embraces both national and internationally recognized principles and practices. By adopting, following, and regularly updating this code, HRID confirms its desire to lead and promote good ethical behavior and corporate governance. HRID ensures adherence to international standards, fostering the confidence of its shareholders, employees, investors, and the general public.
- The company's governing bodies and employees understand this code as their obligation and ensure its spirit and provisions are respected and acted upon throughout the company and its business partners. This code is reviewed and updated annually and published internally in booklet form, company shared folders.
- HRID is committed to maintaining the highest standards of professionalism, honesty, integrity, and fairness, ensuring a workplace free from discrimination and harassment. Employees must not engage in any activity that may be detrimental to the company's interests or bring discredit upon HRID.
- This policy sets out the standards and behaviors that define acceptable business conduct and the actions that may be taken if an employee engages in behavior that is not acceptable to the company. HRID strives to create an environment where honesty and accountability flourish, and compliance is a central focus. We expect our employees to have the courage to make the right decisions based on our ethical principles and to uphold them even under pressure.

### 1.3 Scope

This Code applies to all employees, contractors, suppliers, service providers, and anyone representing or associated with HRID. It encompasses all aspects of business conduct related to or connected with employment at HRID or in connection with company-provided benefits and services.

## 2. Objective

### 2.1 Goals of the Document

- To set clear standards of acceptable conduct.
- To outline the consequences of failing to adhere to these standards.
- To promote an ethical culture based on integrity, respect, and excellence.
- To ensure all business operations are conducted with the highest ethical standards.

## 3. The Company's Values

- **Integrity:** Upholding the highest standards of honesty and ethical behavior.
- **Respect:** Treating everyone with dignity and fostering an inclusive environment.
- **Excellence:** Striving for the highest quality in everything we do.

## 4. Ethical Principles

- **Honesty:** Being truthful and transparent in all interactions.
- **Integrity:** Acting with integrity even in challenging situations.
- **Fairness:** Ensuring fair treatment and opportunities for all.
- **Transparency:** Maintaining openness in our practices and decisions.
- **Respect for the Rule of Law:** Complying with Iraqi laws and respecting human rights.
- **Business Integrity:** Conducting business fairly, avoiding bribery and corruption, and managing gifts and entertainment appropriately.
- **Mutual Benefit:** Building trust and fostering mutually beneficial relationships.
- **Community and Environmental Responsibility:** Respecting the communities we operate in and promoting environmental sustainability

## 5. Standards of Conduct

### 5.1 Employee Conduct

#### A. Professionalism

Employees are expected to maintain a high level of professionalism in all aspects of their work. This includes demonstrating reliability, punctuality, and a strong work ethic. Employees should conduct themselves in a manner that reflects positively on HRID, both within and outside the workplace.

#### B. Confidentiality

Employees must protect the confidentiality of sensitive information. This includes proprietary information, trade secrets, and personal data of employees and customers. Unauthorized disclosure of confidential information is strictly prohibited.



## **B. Fair Pricing and Advertising**

HRID adheres to fair pricing practices and ensures that all advertising is truthful and not misleading. Employees involved in pricing and marketing activities must comply with company policies and relevant laws and regulations.

## **C. Product Safety and Quality**

The company prioritizes the safety and quality of its products. Employees must follow all safety and quality control procedures to ensure that products meet or exceed industry standards and customer expectations.

## **5.3 Business Partner Relations**

### **A. Fair Dealing**

HRID values fairness in all business dealings. Employees are expected to engage with business partners- including suppliers, contractors, and joint venture participants- honestly and respectfully. Fair competition and ethical negotiation practices are fundamental.

### **B. Anti-Corruption and Bribery**

HRID has a zero-tolerance policy towards corruption and bribery. Employees must not offer, give, solicit, or accept any form of bribe or kickback. All interactions with business partners must adhere to anti-corruption laws and company policies.

### **C. Anti-Money Laundering**

- **Compliance with Anti-Money Laundering Laws**

HRID has zero tolerance against money laundering and terrorist financing. Employees must comply with all relevant anti-money laundering (AML) laws and regulations. Any suspicious activities must be reported to the compliance department immediately.

- **Training and Awareness**

The company provides regular training to employees on AML regulations and best practices. This ensures that employees are equipped to recognize and report potential money laundering activities.

### **D. Procurement Practices**

HRID ensures transparent and fair procurement practices. Employees involved in procurement must follow established procedures to ensure that all suppliers and





## 6. Implementation and Compliance

### 6.1 Responsibilities

#### A. Individual Responsibilities

Each employee is responsible for understanding and adhering to the Code of Ethics and Business Conduct. Employees should act with integrity and report any violations or concerns to their supervisors or designated officers.

#### B. Management Responsibilities

Managers are responsible for promoting an ethical culture within their teams. They must ensure their team members understand the code and receive appropriate training. Managers should also handle reports of unethical behavior promptly and fairly.

### 6.2 Reporting and Monitoring

#### A. Reporting Mechanisms

HRID provides a channel for employees to report unethical behavior or violations of the code. These include, and direct contact with supervisors/HR department. The contact email of the HR manager is [ranj.fikrat@hiwarauf.com](mailto:ranj.fikrat@hiwarauf.com) in critical cases employees can directly reach out to the CEO's office.

#### B. Whistleblower Protection

HRID is committed to protecting whistleblowers from retaliation. Employees who report unethical behavior in good faith will not face adverse consequences. The company ensures all reports are investigated thoroughly and impartially.

### 6.3 Training and Awareness

#### A. Induction Programs

HRID provides regular induction programs to ensure employees understand the Code of Ethics and Business Conduct. These programs cover key ethical principles and provide practical examples to help employees apply the code in their daily work.

#### B. Communication of Policies

The company ensures that all employees have access to the Code of Ethics and Business Conduct. Policies are communicated through the intranet, company meetings, and training sessions. Employees are encouraged to ask questions and seek clarification when needed.

## **C. Continuous Improvement**

HRID is committed to continuously improving its ethical standards. Feedback from employees and stakeholders is used to update and enhance the code. Regular reviews ensure that the code remains relevant and effective in addressing emerging ethical challenges.

## **6.4 Enforcement and Discipline**

### **A. Consequences of Violations**

Violations of the Code of Ethics and Business Conduct are taken seriously. Disciplinary actions may include reprimands, suspension, or termination of employment, depending on the severity of the violation, after it is reviewed and approved by the CEO.

### **B. Disciplinary Actions**

HRID has a clear process for investigating and addressing violations of the code. This includes gathering evidence, conducting interviews, and ensuring that disciplinary actions are fair and consistent with company policies, and labour law.

### **C. Appeal Processes**

Employees have the right to appeal disciplinary actions. The company provides a formal process for appeals to ensure that all cases are reviewed impartially and fairly.

## **7. Additional Provisions**

### **7.1 Data Protection and Privacy**

#### **A. Handling Personal Data**

HRID is committed to protecting personal data and ensuring privacy. Employees must handle personal data responsibly and in compliance with data protection laws. Unauthorized access, use, or disclosure of personal data is strictly prohibited.

#### **B. Data Security Measures**

The company implements robust data security measures to protect against data breaches and cyber threats. Employees must follow all security protocols and report any security incidents immediately.



## 8. Review and Updates

### A. Frequency of Review

The Code of Ethics and Business Conduct will be reviewed annually to ensure its relevance and effectiveness. Any necessary revisions will be made to address emerging ethical challenges and changes in laws and regulations.

### B. Employee Acknowledgement

All employees are required to acknowledge their understanding and acceptance of the Code of Ethics and Business Conduct upon joining the company and whenever significant updates are made. This acknowledgement ensures that employees are aware of their ethical obligations and the standards expected by HRID.

## 9. Frequently Asked Questions (FAQ)

### 9.1 Conflict of Interest

**Q: If my friend's company submits a proposal to HRID, is that a conflict of interest?**

**A:** Yes, it can be considered a conflict of interest. You should disclose your relationship with your friend to your supervisor and avoid participating in the decision-making process regarding the proposal.

### 9.2 Gifts and Hospitality

**Q: If I receive a gift from a supplier, what should I do?**

**A:** Report the gift to your line manager and the HR department. They will determine if the gift can be accepted, should be returned, or disposed of in another manner. Accepting gifts of significant value may be considered a conflict of interest.

### 9.3 Confidential Information

**Q: Can I share confidential company information with my family?**

**A:** No, sharing confidential company information with anyone outside of the company, including family members, is prohibited unless authorized.

### 9.4 Reporting Unethical Behavior

**Q: How can I report unethical behavior without facing retaliation?**

