

	<b>AL KOUT INDUSTRIAL PROJECTS Co. K.P.S.C</b>	Doc. No	<b>C-FA-AD-P-010</b>
		Issue No	<b>1</b>
		Rev. No	<b>2</b>
		Rev. Date	<b>10.10.2021</b>
		Pages	<b>1 of 16</b>

## Code of Business Conduct

**REVIEW AND AUTHORIZATION:** Each individual signature confirms this document represents related policies and procedures and will adhere to their respective responsibility in ensuring the content of this document is carried out effectively and efficiently.

**Copy Right Notice:** The information in this document contains confidential and proprietary information of Al Kout Industrial Projects Co. K.P.S.C (Al Kout), and subsidiaries. Herein, after called AIP Group. As a result, this document should not be disclosed, used or duplicated – in whole or in part – for any purpose other than for day-to-day use of AIP Group. No employee of AIP Group will duplicate and use this document in whole or in part thereof without the explicit authorization of the authorized management. In the unlikely event of any unclaimed copies being found, the same shall be returned to any member of the management

<b>Prepared by:</b>	<b>Department and Designation:</b>	<b>Signature &amp; Date</b>
Mary Ann Khalil	Sr. Head Business Performance Improvement	Not required as it is only annual reviewed
<b>Reviewed by:</b>		<b>Signature &amp; Date</b>
Yaqoub AlKandari	HR- leader	<i>Yaqoub</i>
<b>Approved by :</b>		<b>Signature &amp; Date</b>
Faisal Malallah	CEO	<i>Faisal</i>

 al kout industrial projects الكوت للمشاريع الصناعية	<b>AL KOUT INDUSTRIAL PROJECTS Co. K.P.S.C</b>	Doc. No	<b>C-FA-AD-P-010</b>
		Issue No	1
		Rev. No	<b>2</b>
		Rev. Date	<b>10.10.2021</b>
		Pages	<b>Page 2 of 16</b>

## REVISION HISTORY:

A record of additions and omissions are summarized below in each revision release.

Rev	Revision Date	Brief description of change
1	05.03.2019	Complete re-write; addition of appendixes
2	10.10.2021	annual basis reviewed and update the email address
<b>Table of Contents</b>		
No	Content	Page Number
	Review and Authorization, and Copyright Notice	1
	Revision History	1
	Purpose, Scope, Responsibility, Policy Revisions	4
<b>Policy:</b>		
<b>1.0</b>	<b>Our Commitment to the Code</b>	<b>5</b>
1.1	How to Report a Concern or Code Violation	5
1.2	Handling Reports and Investigations	5
1.3	Cooperation and Confidentiality	5
1.4	No Retaliation	5
1.5	Compliance with Applicable Laws and Ethical Standards	6
1.6	Enforcement	6
<b>2.0</b>	<b>Our Commitment to Ethics and the Law</b>	<b>6</b>
2.1	Anti-Bribery and Anti-Corruption	6
2.2	Gifts and Hospitality	6
2.3	Use of Third-Party Intermediaries	7
2.4	Insider Information and Trading	7
2.5	Competition, Anti-Trust and Fair Trade	7
<b>3.0</b>	<b>Our Commitment to Our Workplace</b>	<b>7</b>
3.1	Health, Safety and Environment	7
3.2	Employment Practices	8
3.2.1	Equal Opportunity	8
3.2.2	Harassment Prevention	8
3.3	Workplace Violence	8
3.4	Substance Abuse (Drugs and Alcohol)	8
<b>4.0</b>	<b>Our Commitment to Our Company</b>	<b>8</b>
4.1	Conflicts of Interest	8
4.2	Financial Integrity, Reporting and Internal Controls	9

	<b>AL KOUT INDUSTRIAL PROJECTS Co. K.P.S.C</b>	Doc. No	<b>C-FA-AD-P-010</b>
		Issue No	1
		Rev. No	<b>2</b>
		Rev. Date	<b>10.10.2021</b>
		Pages	<b>Page 3 of 16</b>

4.2.1	Financial Integrity	9
4.2.2	Maintaining Accurate Books and Records	9
4.2.3	IT Systems and Applications	9
4.2.4	Preventing and Detecting Fraud	10
4.3	Protection of Property, Assets and Information	10
4.3.1	Confidential Information	10
4.3.2	Company Property and Assets	10
4.3.3	Intellectual Property	10
4.4	Communication with the Public	10
<b>5.0</b>	<b>Our Commitment to Our Community</b>	<b>11</b>
5.1	Labor and Human Rights	11
5.2.1	Corporate Social Responsibility	11
<b>Appendices:</b>		
App1	Appendix 1: Our Pledge to the Code	12
App2	Appendix 2: Code of Business Conduct Compliance Statement	13
App3	Appendix 3: Conflicts of Interest Disclosure Statement	14
App4	Appendix 4: Gifts and Hospitality Register	15
App5	Appendix 5: Whistleblower Incidence Log	16

	<b>AL KOUT INDUSTRIAL PROJECTS Co. K.P.S.C</b>	Doc. No	<b>C-FA-AD-P-010</b>
		Issue No	1
		Rev. No	<b>2</b>
		Rev. Date	<b>10.10.2021</b>
		Pages	<b>Page 4 of 16</b>

## PURPOSE:

To establish the policy for the Code of Business Conduct (referred as “the Code” or “CBC”), including assigned responsibility, templates and reporting requirements.

## SCOPE:

This policy will be uniformly applied for Al Kout Industrial Project (AIP) Group, including all its subsidiaries. Going forward, all companies will also be referenced inclusively as “the Company”.

## Responsibility:

The Ethics Committee is responsible for the implementation and enforcement of the Code. The Company’s senior management is also responsible for ensuring adherence to the Code. All employees, including the Board of Directors, and anyone else who represents the Company must comply with the Code. This includes all interactions with co-workers and oversight of any subordinates or third parties acting on behalf of the Company.

## POLICY REVISIONS:

On an annual basis, this policy will be formally reviewed to ensure any revisions will be updated accordingly and as per authorized individuals as outlined on the Review and Authorization page.

	<b>AL KOUT INDUSTRIAL PROJECTS Co. K.P.S.C</b>	Doc. No	<b>C-FA-AD-P-010</b>
		Issue No	1
		Rev. No	2
		Rev. Date	<b>10.10.2021</b>
		Pages	<b>Page 5 of 16</b>

## POLICY:

# 1.0 Our Commitment to the Code

The Code for AIP Group is intended to provide clarity in respect of the Company's expectations of how its employees and third-parties acting on behalf of the Company should conduct business. It is also intended to help individuals avoid unintentionally being in conflict or wrongdoing.

## 1.1 How to Report a Concern or Code Violation

Employees, customers, subcontractors, vendors and other stakeholders can report concerns of suspected or actual violations of the Code. Raising such concerns protect our Company, our employees and other stakeholders. We want to ensure that our conduct is in line with our Code, and we can only do that if people have the commitment to report suspected wrongdoing. The Company has established several reporting channels:

1. Ethics Committee Member
2. Post Box: ATTN: Ethics Committee
3. COBC@alkoutprojects.com
4. Company Website

P.O. Box: 10277, Shuaiba-65453, Kuwait

## 1.2 Handling Reports and Investigations

We are committed to review and respond to all matters that may violate the Code or any laws and regulations.

A fair and thorough investigation will be conducted and appropriate remedial steps, as warranted, will be taken to sustainably address any violations. To address any concerns or complaints, relevant details (name, position, location, dates, information related to the concern or complaint and any evidence) will be helpful. Insufficient information will make it challenging and difficult to investigate and resolve such concerns or complaints.

## 1.3 Cooperation and Confidentiality

Full cooperation is expected in Company investigations, including providing clear, truthful and complete information during an investigation. All reports will be treated confidentially to the fullest extent possible.

	<b>AL KOUT INDUSTRIAL PROJECTS Co. K.P.S.C</b>	Doc. No	<b>C-FA-AD-P-010</b>
		Issue No	1
		Rev. No	<b>2</b>
		Rev. Date	<b>10.10.2021</b>
		Pages	<b>Page 6 of 16</b>

## 1.4 No Retaliation

Threats or retaliation will not be tolerated against any individual asking a question, raising a concern, reporting a violation or cooperating in an investigation, in good faith. Threats or retaliation should be reported immediately.

## 1.5. Compliance with Applicable Laws and Ethical Standards

We comply with Kuwait and the local applicable laws, rules and regulations. Each person is expected to understand and comply with the laws, rules, regulations and policies applicable to their job responsibilities.

## 1.6 Enforcement

Individuals who violate the Code, misuse their position of authority, has knowledge of a violation and does not act promptly to report and correct it; refuse to cooperate during an investigation, make a knowingly false complaint or retaliate against someone for reporting a concern may be subject to disciplinary action, including dismissal.

## 1.7 Waiver

The Ethics Committee must approve any waiver of any matters related to provisions of the Code. All waivers shall be documented.

# 2.0 Our Commitment to Ethics and the Law

## 2.1 Anti-Bribery and Anti-Corruption

You may not solicit, accept, offer or provide kickbacks, illegal payments or similar favors. **Bribery** or **Corruption** is where **anything of value** in the form of a bribe, kick-back or payment received or made directly or indirectly in exchange for an improper advantage, preferential treatment, to influence a decision or to obtain or retain business.

There are criminal and civil penalties that may be applicable to the employee or representative and the Company for engaging in any form of corruption.

## 2.2 Gifts and Hospitality

The Company expects the use of good judgment and moderation when giving or accepting **gifts** or **hospitality** in respect of business activities. **Gifts and hospitality** and anything of value (which include meals, hotels, lodging, travel and

	<b>AL KOUT INDUSTRIAL PROJECTS Co. K.P.S.C</b>	Doc. No	<b>C-FA-AD-P-010</b>
		Issue No	1
		Rev. No	<b>2</b>
		Rev. Date	<b>10.10.2021</b>
		Pages	<b>Page 7 of 16</b>

entertainment). No gift or hospitality should be accepted or given if it obligates, or appears to obligate, the recipient, or if it might be perceived as an attempt to influence in exchange for an improper advantage, can be construed as a bribe or kickback, not consistent with local customs, or violates local laws.

Cash, gift vouchers, or loans, in any amount, are strictly prohibited. Gifts or hospitality from any person seeking to do business with, or is a competitor of the Company, is prohibited. Offering or receiving Gifts or hospitality in excess of 100 KWD or equivalent value must report it to the Ethics Committee. The employee or representative may be required by the Ethics Committee to return or dispose of gifts that do not comply with the Code.

### 2.3 Use of Third-Party Intermediaries

Promises, offers or payments for the purposes of corruption or bribery made through third-party intermediaries are prohibited. An intermediary is a third-party hired on behalf of the Company to carry out unethical and illegal activities.

### 2.4 Insider Information and Trading

Through our employment, we may learn material, nonpublic information (or “inside” information) about our Company or another Company with which we do business. It is illegal to trade stock on the basis of non-public information or “tip off” such material non-public information to another person that would help them make a profit or prevent a loss.

Penalties for violation of insider trading laws can be severe for both the individuals involved and our Company.

### 2.5 Competition, Anti-Trust and Fair Trade

We are committed to conducting business freely, fairly, open competition and in accordance to Kuwait’s Anti-Trust and Anti-Trade laws. This includes formal or informal agreements with competitors. Violations of anti-trust and anti-trade laws, intentionally or unintentionally, can result in penalties and reputational risk for the Company.

## 3.0 Our Commitment to Our Workplace

### 3.1 Health, Safety and Environment

Keeping our workforce healthy, safe and protecting the environment are key to the Company in achieving its Vision.

While on the Company’s premises or acting within the scope of your job responsibilities, you must comply with all applicable Health, Safety and Environmental laws, Company policies and procedures and assume responsibility for the protection of yourself, your co-workers and the environment. This includes adhering strictly to the use of Personal Protection Equipment at all times, while on facility premises, as required; adhering to no cellular phone usage in

	<b>AL KOUT INDUSTRIAL PROJECTS Co. K.P.S.C</b>	Doc. No	<b>C-FA-AD-P-010</b>
		Issue No	1
		Rev. No	<b>2</b>
		Rev. Date	<b>10.10.2021</b>
		Pages	<b>Page 8 of 16</b>

restricted areas; and smoking in only designated areas. We are committed to ensure the safety of all our employees, subcontractors and all other individuals on our facility premises. It is our endeavor to eliminate on-the-job injuries, prevent adverse environmental impacts, maintain noise levels, and reduce waste and emissions. This can only be achieved through the cooperation and commitment of each employee.

Non-compliance with the laws, rules and regulations of the Country, including regulatory agencies, even if unintentional, can result in serious penalties including criminal prosecution of persons involved and our Company.

## 3.2 Employment Practices

### 3.2.1 Equal Opportunity

We are committed to providing equal opportunity in all aspects of employment without regard to race, religion, national origin, sect, gender, marital status or age. Our HR policies and practices are administered in a non-discriminatory manner in all aspects of the employment relationship, including recruitment, hiring, job assignment, development, promotion, transfer, discipline, termination, layoff, compensation and benefits.

Employees are not to disclose their salary package, allowances, incentives/bonus and increments with any employee to avoid comparison and conflicts. Doing so, will be subject to disciplinary action including possible termination.

### 3.2.2 Harassment Prevention

We are committed to maintaining a healthy and positive workplace, free from any harassment and discrimination.

It is not acceptable to engage in conduct that is degrading, offensive, humiliating, intimidating or physical conduct. Behaviors that may appear small or innocent may create an environment that may be perceived as offensive to individuals and the overall atmosphere of the Company. No employee shall falsely accuse another or make malicious statements that damage or offend their reputation either orally, in writing, via email or through social media.

## 3.3 Workplace Violence

The Company prohibits violence or threats of violence in the workplace. We expect employees to resolve their differences through discussion and with the intention of understanding and mutual respect. Employees who have been threatened or subjected to violence in or outside of the workplace should report it immediately.

## 3.4 Substance Abuse (Drugs and Alcohol)

The Company is committed to a work environment, free of substance abuse. The use, possession, sale, purchase or

	<b>AL KOUT INDUSTRIAL PROJECTS Co. K.P.S.C</b>	Doc. No	<b>C-FA-AD-P-010</b>
		Issue No	1
		Rev. No	<b>2</b>
		Rev. Date	<b>10.10.2021</b>
		Pages	<b>Page 9 of 16</b>

transfer of alcohol, illegal drugs or drug paraphernalia by employees while on Company property or conducting work on or off Company premises, is prohibited. Working under the influence is subject to disciplinary action, up to and including dismissal of employment. The Company reserves the right to search Company property, as permitted by local law.

## 4.0 Our Commitment to Our Company

### 4.1 Conflicts of Interest

Conflict of interest is where an individual's personal activities or financial interests appear to or actually interfere or influence the individual's ability to act in the best interest of the Company. This includes using information for personal gain or taking advantage of a business opportunity through employment. Employees should avoid any investment, interest, association or activity that may give the appearance or is an actual conflict. Conflicts of Interest can provide an improper personal benefit to relatives, which include a spouse, domestic relationship, children, parents, grandparents, siblings, aunts, uncles, nieces, nephews, cousins, in-laws (brother, sister, father, mother, son and daughter), step-relatives, and any person sharing the same household on a continuous basis.

Potential conflicts of interest can be prevented or remedied by full disclosure. Without prior written consent from the Company, no employee or Board of Director may serve (even without compensation) as a consultant to, or as a Director, Officer, or employee of, a Company that competes with, does business with or seeks to do business with the Company. All potential conflicts must be reported.

### 4.2 Financial Integrity, Reporting and Internal Controls

#### 4.2.1 Financial Integrity

Our records must accurately and fairly represent actual Company's assets, liabilities, revenues and expenses, in line with International Financial Reporting Standards (IFRS). Placing integrity at the forefront of the Company's financial reporting demonstrates our commitment to the public and our shareholders.

#### 4.2.2 Maintaining Accurate Books and Records

The Company is expected to maintain its books, records and accounts in reasonable detail, supported, recorded in the proper account and in the proper accounting period, to accurately and fairly reflect the Company's transactions, as well as the purchase or disposal of assets.

Any attempt to conceal or misstate information in the Company's financial records, including intentionally misleading entries, intentional misclassification of transactions, accounts or accounting periods is a violation of the Code. All

	<b>AL KOUT INDUSTRIAL PROJECTS Co. K.P.S.C</b>	Doc. No	<b>C-FA-AD-P-010</b>
		Issue No	1
		Rev. No	<b>2</b>
		Rev. Date	<b>10.10.2021</b>
		Pages	<b>Page 10 of 16</b>

employees are expected to demonstrate financial integrity in processing Business Expense Forms, Payment Authorization Requests, use of Company debit / credit cards and other financial transactions. Cash or other assets must not be maintained in any unrecorded or “off the books” fund for any purpose.

Key records should be maintained in a timely and accurate manner. This protects the Company’s resources and meets the expectations of people who rely on the accuracy of our records to perform their jobs.

We all have a responsibility to manage Company records, whether in paper or electronic form. Any records related to a litigation or investigation, must be preserved to ensure relevant documents are not destroyed or modified in any way.

### 4.2.3 IT Systems and Applications

The Company relies on its employees to use its IT systems and applications in carrying out their work responsibilities. It is essential employees optimally use IT systems and applications responsibly and avoid misuse.

### 4.2.4 Preventing and Detecting Fraud

We rely on our employees, policies and procedures and related processes and internal controls to protect the Company’s assets against damage, theft and unauthorized use. You are responsible for understanding your approval limits and internal controls relevant to your job responsibilities and adhering to the policies and procedures related to those controls. You are responsible for understanding what you are approving and for ensuring the transactions and supporting documentation accurately reflect the nature, timing and value of the event. Company assets should not be taken for personal use, such as taking scrap material or falsifying a travel or business entertainment expense report.

## 4.3 Protection of Property, Assets and Information

### 4.3.1 Confidential Information

Company confidential information should only be shared internally with those who have a business or legal need to know. Each employee is expected to keep confidential and protect proprietary records, files, data and technical information. This also includes confidential and proprietary information relating to past, present or planned business activities that has not been released publicly by the Company. Your obligations regarding respecting confidential or proprietary information continue after your employment or affiliation with the Company ends.

### 4.3.2 Company Property and Assets

Every employee must ensure that Company property and assets are protected and used appropriately. Company

	<b>AL KOUT INDUSTRIAL PROJECTS Co. K.P.S.C</b>	Doc. No	<b>C-FA-AD-P-010</b>
		Issue No	1
		Rev. No	<b>2</b>
		Rev. Date	<b>10.10.2021</b>
		Pages	<b>Page 11 of 16</b>

property, which includes equipment, tools and machinery, offices, data or intellectual property must not be used for personal reasons. Company property should not be removed from Company facilities unless necessary and authorized to carry out such work. Incidental or occasional personal use of Company property or office equipment, such as phones, computer, printer or copy machine may be permitted. However, excessive use of such equipment is unacceptable and may result in disciplinary action.

### 4.3.3 Intellectual Property

In addition to above, Company property also includes intellectual property such as inventions, innovations, discoveries, improvements or ideas conceived, developed or learned during your employment, whether or not eligible for patent, copyright, trademark or other trade protection. Unauthorized disclosure or misuse of intellectual property is prohibited.

### 4.4 Communication with the Public

In order to ensure communication with the public is accurate and consistent, the VP – Head of Admin and HR and CEO are the only designated individuals to communicate with the media or public can represent the Company. Inquiries from the media, investors or the public regarding the Company or information that is confidential or proprietary should be directed to above mentioned persons. No other employees are allowed to talk to the media, represent the Company to the public, disclose any Company confidential information, or defame the Company on any social media.

## 5.0 Our Commitment to Our Community

### 5.1 Labor and Human Rights

For the communities in which we operate, such commitment includes observing the Kuwait Labor laws and cultural values in which we operate and conducting business as a responsible member of society. This includes the right to a safe work environment, the right to compensation and a workplace free of child / slave labor.

Our commitment also includes promoting respect for ethical conduct and human rights with third parties with whom the Company does business with and we prefer our contractors and suppliers with whom we do business to embrace similar values and standards.

### 5.2 Corporate Social Responsibility

Our Company participates in charitable activities to support our community, which may include sponsoring, funding or supporting various initiatives aimed to have a positive impact in Kuwait. When the Company participates in a charitable activity, it should be made known that it is a Company sponsored activity.

	<b>AL KOUT INDUSTRIAL PROJECTS Co. K.P.S.C</b>	Doc. No	<b>C-FA-AD-P-010</b>
		Issue No	1
		Rev. No	<b>2</b>
		Rev. Date	<b>10.10.2021</b>
		Pages	<b>Page 12 of 16</b>

Where employees undertake personal commitment towards charitable activities, it should be done individually, outside of working hours, with one's own resources and not as a representative of the Company. Unless expressly authorized by the CEO, do not represent or imply representation of the Company in respect of any personal activities.

**Annexure 1:** All employees will be responsible to sign the Pledge.

## OUR PLEDGE TO THE CODE

- ◇ I pledge to comply and promote the Company Code of Conduct (the Code) in all my duties and responsibilities, and engagement with internal and external stakeholders.
- ◇ I pledge to act responsibly, including escalating or reporting concerns or actual violations of the Code through the appropriate reporting channels and handling protocols.
- ◇ I pledge to act ethically and legally, and will not participate or assist anyone inside or outside of our Company in conducting or facilitating unethical or illegal conduct.
- ◇ I pledge to uphold the Health, Safety, and Environmental standards for the wellbeing of our community, our environment and for the upkeep of our facilities and equipment.
- ◇ I pledge to ensure Company property, assets, proprietary information and intellectual property are protected and retained confidentially.
- ◇ I pledge to be responsible to maintain Company records, whether in paper or electronic form, in good order, in reasonable detail, supported and properly filed.
- ◇ I pledge to contribute to fostering a workplace environment of mutual respect, responsibility and team spirit for all colleagues in the workplace. I pledge to respect and promote a safe work environment for all, void from discrimination or harassment and observant of the laws and cultural values in which we operate.

Employee Name:	Department and Designation:	Signature & Date

I hereby acknowledge that I have read and understood the Code and will be responsible for obtaining all future amendments and modifications thereto. I understand my pledge acknowledgment will become a part of my permanent record.

	<b>AL KOUT INDUSTRIAL PROJECTS Co. K.P.S.C</b>	Doc. No	<b>C-FA-AD-P-010</b>
		Issue No	1
		Rev. No	<b>2</b>
		Rev. Date	<b>10.10.2021</b>
		Pages	<b>Page 13 of 16</b>

**Annexure 2:** Board of Directors and Employees in sensitive positions (Sales, Business Development, Supply Chain, Admin, Compliance, Finance, Warehouse Management, Maintenance and Petty Cash administrators), including all employees in grade 8 and above are required to sign. All other employees once every 3 years.

# CODE OF BUSINESS CONDUCT COMPLIANCE STATEMENT

- I. I have read and understand the Code of Conduct (the Code). I will make sure to read and understand all future amendments to the Code. I have had an opportunity to ask questions about it and agree to comply with it.
- II. Except as stated in section III. Disclosure below:
- i) I have not committed any violations of the Code or any laws relating to the Company.
- ii) I know of no acts or omissions committed by anyone which conflict with any sections of the Code or any suspected violations of law related to the Company.

III. Disclosure:

The following information discloses circumstances which may possibly be a violation of the Code or the law:

---



---



---



---

I will immediately report, as appropriate, any suspected violations of the Code or law, as they arise during the course of my employment. I understand that my failure to comply with the Code, is a violation and may result in disciplinary action up to, and including, termination and/or legal proceedings.

 al kout industrial projects الكوت للمشاريع الصناعية	<b>AL KOUT INDUSTRIAL PROJECTS Co. K.P.S.C</b>	Doc. No	<b>C-FA-AD-P-010</b>
		Issue No	1
		Rev. No	<b>2</b>
		Rev. Date	<b>10.10.2021</b>
		Pages	<b>Page 14 of 16</b>

**Annexure 3:** Board of Directors and Employees in sensitive positions (Sales, Business Development, Supply Chain, Admin, Compliance, Finance, Warehouse Management, Maintenance and Petty Cash administrators), including all employees in grade 8 and above are required to sign. All other employees once every 3 years.

## CONFLICT OF INTEREST

Employee Name:	Department and Designation:	Signature & Date

## DISCLOSURE STATEMENT

**Relatives** defined as spouse, domestic relationships, children, parents, grandparents, siblings, aunts, uncles, nieces, nephews, cousins, in-laws (brother, sister, father, mother, son and daughter), step-relatives or any person sharing the same household on a continuous basis.

III. Financial Interests: Do you or any of your relatives hold a position as officer, director, board member, key employee or own a material financial interest (5% or more of stock) or receive profits from a business that:

- |   |                              |  |                             |
|---|------------------------------|--|-----------------------------|
| i. Provides goods or services to AIP Group    | Yes <input type="checkbox"/> |  | No <input type="checkbox"/> |
| ii. Receives goods or services from AIP Group | Yes <input type="checkbox"/> |  | No <input type="checkbox"/> |
| iii. Competes with AIP Group                  | Yes <input type="checkbox"/> |  | No <input type="checkbox"/> |

II. Activities: Do you or any of your relatives provide managerial, consulting services or actively participate in decision making for any Company doing business with or competing, with AIP Group? Any other activities that may be perceived as an actual or perceived conflict of interest?

III. Gifts: Have you or any of your relatives accepted gifts, gratuities, entertainment, services or other favors from any person or Company doing business with AIP Group?

If you have marked "yes" to any of the above, please explain with as much detail as necessary to provide full disclosure of all possible conflicts of interest:

---

 <b>KOUT</b> al kout industrial projects الكوت للمشاريع الصناعية	<b>AL KOUT INDUSTRIAL PROJECTS Co. K.P.S.C</b>	Doc. No	<b>C-FA-AD-P-010</b>
		Issue No	1
		Rev. No	2
		Rev. Date	10.10.2021
		Pages	Page 15 of 16

**Annexure 4:** Ethics Committee approval must be obtained and recorded for all gifts and hospitality offered, given or received, which are valued at KWD 100 or above (or equivalent in value). Advance approval should be obtained prior to offering or giving gifts and hospitality.

## Gifts and Hospitality Register

Employee Name:		Department and Designation:		Signature & Date	
Reference Number		Date:			
Employee Name		Grade Employee #			
Employee Title		Department			
Gift/Hospitality offered to:  Yes <input type="checkbox"/> No <input type="checkbox"/>	Full Name:		Gift/Hospitality offered by:  Yes <input type="checkbox"/> No <input type="checkbox"/>	Full Name:	
	Title:			Title:	
	Company:			Company:	
Gift/Hospitality accepted?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Actual / Estimated Value		KWD	
Gift/Hospitality description:  *for Hospitality, include name and title of attendees					
Gift retained by Ethics Committee?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Final disposition of Gift retained by Ethics Committee:			
Ethics Committee Member Approver Name:	Ethics Committee Member Approver Signature & Date:				

