



Code of Conduct



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1.0 Group CEO Message

Welcome to our Code of Conduct. This Code applies to all employees at OQ and sets out the principles and standards of behavior we follow as a company and which should guide all our actions and decisions.

Our ambition at OQ is to compete at the highest level globally, and this can only be achieved if all our business interactions are not only legal but also ethical and in accordance with the values laid out in this Code. The Code of Conduct therefore provides OQ with a solid foundation for a sustainable future.

Each and every one of you is responsible to be familiar with our Code of Conduct and to uphold our values in day-to-day activities. Compliance with the Code of Conduct is mandatory, and any breach of laws and regulations could lead to disciplinary actions. Should you suspect a violation of the rules set out in our Code of Conduct, please contact the Ethics and Business Integrity team and your concerns will be addressed with strictest confidentiality.

I count on your individual and collective engagement and appreciate your commitment to upholding and complying with our ethical standards.

A handwritten signature in black ink, appearing to read 'Talal Hamid Al Awfi'.

Talal Hamid Al Awfi

Group Chief Executive Officer



2.0 About our Code of Conduct

2.1 Who does it apply to?

This Code of Conduct applies to all employees, officers and executive staff of OQ worldwide, as well as any agent or person working under contract that occupies a permanent or temporary position within OQ, such as seconded staff or staff sourced from manpower contractors.

We will also strive for our independent contractors, consultants, and suppliers to be aware of and to comply with these standards. Accordingly, OQ sets regulations for all distributors and agents, and significant third party vendors, suppliers and partners that have business relationships with OQ (Third Party Code of Conduct).

2.2 What are the effects of different legal regulations in different countries?

OQ is active worldwide. This means that we may be subject to the laws and regulations of different countries. The Code establishes a set of principles of business conduct that apply regardless of the location of the Personnel. Wherever local customs, standards, laws, or regulations differ from these principles, we must comply with either the Code or local regulations, whichever are stricter.

2.3 What is expected of everyone?

Comply with the Code and the law

Read and understand the Code. Comply with the Code and the laws, rules, and regulations applicable to OQ wherever you are. Use good judgment when representing OQ and avoid the appearance of improper behaviour. Speak up if you believe that our Code has been breached (see Article 12.0).

Consider your actions

If ever in doubt about a course of conduct, ask yourself:

- Is it consistent with the Code?
- Is it legal?
- Is it ethical?
- Have I understood the potential risks?
- Will it reflect well on OQ and me?
- Would I want to read about it in the newspaper?

If the answer is “no” to any of these questions, don’t do it. If in doubt, seek guidance from the Ethics and Business Integrity team.

Ask for guidance

If you are still uncertain, ask for guidance. The Code tries to cover many situations that you will encounter but cannot address every circumstance. You can seek help from your direct superior, your relevant business function Compliance Ambassador, the Ethics and Business Integrity team or your usual legal focal point.

For advice and support, contact ethicalconduct@oq.com.

3.0 Administration of the Code

This Code is designed to ensure consistency in how we conduct ourselves within and outside of OQ. The procedures for handling approvals and any potential violations of the Code have been developed to ensure consistency in the process. The Code does not exhaust the topics addressed herein and OQ will issue from time to time new or revised policies to complement and regulate such topics in further detail.



3.1 Responsibility

To uphold OQ's reputation as a responsible company, all Personnel must be aware of these principles and take them to heart in their daily work. For this reason, we are all requested to:

- verify that we have read and understood the Code of Conduct;
- adhere to all laws and requirements that are applicable to our working area at OQ, and do not conduct any activities which we know or should know would violate any laws or internal guidelines;
- avoid situations that could lead to a conflict between personal interests and the interests of OQ and take no action that could be potentially damaging to the company;
- adhere to socially accepted ethical principles in the workplace pertaining to ethical and moral human behaviour in various situations;
- complete all assigned compliance trainings, compliance acknowledgments and declarations in a timely manner;
- report any and every possible breach of the Code of Conduct;
- consult the Ethics and Business Integrity team or the legal department in case Personnel or OQ could come into conflict with the principles established in this Code of Conduct; and
- consult your relevant business function Compliance Ambassador or the Ethics and Business Integrity team in case of uncertainty on how to handle a situation.

3.2 Responsibility of leading personnel

Compliance and the responsibility for the day-to-day implementation in the workplace is the duty of every Personnel and his or her respective supervisor. However, Personnel holding a leading position at OQ are particularly expected to:

- demonstrate commitment to leadership and teamwork;
- lead by example to ensure that all team members understand and adhere to the Code and laws applicable to their areas of responsibility;
- make themselves aware of the risks that exist in their remit and ensure appropriate controls are in place to mitigate those risks;
- promote sensitivity of team members toward situations that could lead to illegal or immoral behaviour or that stand in opposition to the values of OQ;
- contribute to creating an environment of trust and confidence to encourage team members to ask questions or report concerns;
- seek support whenever required through their relevant business function Compliance Ambassador and Ethics and Business Integrity team; and
- promptly escalate reports from team members to the Ethics and Business Integrity team.

3.3 Responsibility of corporate management

Board of Directors

The Board of Directors is responsible for setting the ethical standards and values of OQ and ensuring that they are embedded as part of the organisation's culture.

The Board shall also decide on matters pertaining to the Group CEO and his direct reports.

OQ Group CEO

- Monitors and oversees the implementation of the Code throughout OQ.
- Approves policies and implementation guidelines of the Code.
- Appoints the members of the Ethics Committee and approves the Committee's Terms of Reference.
- Periodically reports to the Audit & Risk Committee on Code matters.



Ethics Committee

- Reviews investigations into cases of violations of the Code brought to its notice through OQ's whistleblowing reporting tools or other means.
- Assesses investigation findings and determines appropriate consequences and corrective actions to be taken in view of investigation outcomes.
- Assigns persons and teams responsible to implement corrective actions.
- Acts as an advisory and recommendatory body on matters relating to the Code including reviewing of procedures and implementation guidelines relating to the Code as proposed by management.
- Oversees OQ's whistleblowing program.
- Assists the OQ Group CEO and the Audit & Risk Committee in their oversight responsibilities of the compliance to the Code by providing periodic and, if applicable, anonymized reports.

3.4 Acknowledgement of the Code

All Personnel must acknowledge and confirm that they have read the Code and agree to follow its provisions. Failure to read the Code or confirm acknowledgement does not excuse from compliance with the Code.

4.0 Personal integrity

We must ensure our personal activities and interests do not conflict with our responsibilities to OQ. It is important that even the appearance of a conflict of interest be avoided.

4.1 Fraudulent and unlawful activities

No person to whom the Code applies shall perpetrate or abet the perpetration of fraud or any unlawful activity.

4.2 Conflicts of interest

As a company owned by the government of the Sultanate of Oman, all Personnel are subject to enhanced legal requirements concerning potential conflicts of interests. Therefore:

- we shall not use our position or work to realise an advantage for ourselves or for others, nor use our influence to facilitate others to obtain a benefit or preferential treatment;
- we shall not act as broker, agent or sponsor to any company or establishment whose activities are related to OQ;
- we shall not combine our position or work with any other work in the private sector that is associated with OQ or operates in direct competition with OQ; and
- we shall not own an interest in any company, establishment or other profit-making business that is directly associated with our work.

It is important that you become familiar with the law relating to conflict of interest applicable to you and/or your Relatives. You may approach the Ethics and Business Integrity team for guidance in this regard.

In addition to the above listed restrictions, this Code sets further limits that address other potential conflict scenarios. A conflict of interest also arises under this Code whenever:

- personal activities or interests are affecting your independent judgment at OQ;
- a situation has the potential to detract from your ability to act or make decisions free from bias and in the best interests of OQ; or
- you or any Relative have a personal interest in an activity being conducted or a decision being made by OQ.



If you encounter a potential conflict of interest scenario, you should immediately disclose all relevant details to your superior or to your usual legal focal point. If the conflicted party is a member of the Board of Directors or an executive, you shall notify the Ethics Committee.

In order to help avoid and monitor potential conflict of interests, you might be required to formally disclose conflicts of interest or potential conflicts of interest at least annually and to update in the event of a change to the Ethics and Business Integrity team.

Examples

Some of the more common conflicts that must be avoided are set out below (consider this list as not exhaustive):

- when a Relative receives improper personal benefits as a result of your position at OQ;
- if you work for or receive payments from any customer, supplier or competitor of OQ;
- any direct or indirect ownership interest in any customer, supplier or competitor of OQ;
- any consulting or employment relationship with any customer, supplier or competitor of OQ;
- being in the position of supervising, reviewing or having any influence on the job evaluation, pay or benefit of any Relative;
- selling anything to OQ or buying anything from OQ or any OQ customer, supplier or competitor, on terms and conditions that are not comparable with terms at which other similarly placed Personnel are permitted to purchase or sell; and
- using corporate property, information, or position to pursue business opportunities for personal gain or competing with OQ for business opportunities.

4.3 Insider trading

Insider trading is the trading of a publicly listed company's stock or other securities (such as bonds, stock options or derivatives) by individuals with access to non-public and price-sensitive information about such company. Applicable laws, rules and regulations that prohibit insider trading (directly or through others) or the sharing of such information must always be followed.

Inside information is any information that is not available in the public domain and is material. Material information is any information that is likely to have an effect on the price of securities or information that is likely to cause a reasonable person to base investment decisions on. For guidance and information on the laws, rules, and regulations concerning insider trading, please consult the legal department.

5.0 Gifts and entertainment

Gifts and entertainment from or for existing or prospective customers, suppliers or partners must support the legitimate business interests of OQ and should be reasonable and appropriate under the circumstances. Always be sensitive to our customers', suppliers' and partners' own rules on gifts and entertainment.

Business Gifts and entertainment can build goodwill and are a part of normal business relationships. However, they can also create a perception of conflict of interest that can undermine the integrity of those relationships and are subject to potential abuse.

Accordingly, OQ sets local limits on the types and value of Gifts and entertainment (see "Anti-Bribery and Corruption Prevention Policy Manual") that you are permitted to accept or give in connection with your work and requires visibility and disclosure regardless of type or value as described below. Suitable Gifts and entertainment must meet all the following requirements:

- they are consistent with customary business practices;
- they are not excessive in value;
- they cannot be construed as a bribe or payoff; and
- they are in compliance with the local laws, rules, and regulations.



5.1 Gifts

A Gift is “anything of value”, either material or immaterial, given or received without the expectation of payment or anything in return. Therefore, if you encounter any situation where you accept or want to give a Gift in connection with your work, you must not:

- accept or give Gifts that could influence, or even appear to influence, a business decision;
- ask or be asked for Gifts from an existing or prospective customer, supplier or partner; or
- accept or give Gifts of cash or cash equivalents, such as vouchers and gift cards.

A suitable Gift to a Relative is considered as a business gift if given as a result of an existing business relationship. Any Gift or invitation that is addressed exclusively to a Relative is considered as an attempt to circumvent the principles and rules of the Code and is therefore prohibited.

5.2 Entertainment

You may accept occasional meals and other forms of entertainment from existing and prospective customers, suppliers and partners only if the event is attended by the customer, supplier or partner, and the meals or other form of entertainment meet all of the requirements set in this Code.

5.3 Refusing gifts and entertainment

If you are offered a Gift or entertainment invitation in contravention of the foregoing principles, politely decline, and explain our rules. If returning a Gift would offend the giver, or the circumstances under which it was given prevent its return, you may accept the Gift, but must promptly notify the Ethics and Business Integrity team. OQ will either donate the item to charity or distribute or raffle the item among a large group of Personnel and inform the giver of its disposition.

6.0 Public officials

It is strictly forbidden to directly or indirectly offer, promise, give, pay, demand, or receive anything of value to influence a discretionary act or decision, or to secure or grant an improper advantage.

The global nature of our business often requires that we interact with public officials of various governments around the world. Transactions with governments and government-controlled entities are covered by special legal rules and are not the same as conducting business with private parties. The provision of gifts and entertainment to public officials is often constrained or prohibited by applicable laws, rules, and regulations.

6.1 Who are public officials?

Public officials may include:

- domestic and foreign government employees and representatives;
- the staff of any public organisation or government-controlled entity;
- a community leader or other person in a position of public trust; and
- the staff of public international organisations, such as the United Nations.

As a staff member of an ultimately government-controlled entity you are a public official under Omani law and may also be regarded as such under foreign law as well. It is your responsibility to understand whether someone you deal with is also a public official. Consult the legal department to be certain that you are aware of, understand and follow applicable laws, rules, and regulations.

6.2 Corruption and bribery

A bribe is directly or indirectly offering, promising, giving or paying anything of value to a public official to influence a discretionary act or decision, or to secure an improper advantage. In our own capacity as public officials, a



bribe in turn is demanding or receiving anything of value from a third party to influence a discretionary act or decision of any Personnel, or to grant an improper advantage.

Examples of bribes include payments or other pecuniary benefit to encourage a decision to award, retain or direct business relations; to influence the outcome of a government audit or inspection; or to secure an improper advantage. Other payments to public officials may also constitute bribes in some jurisdictions. Company representatives should consult the legal department regarding locally applicable anti-bribery and anti-corruption laws.

6.3 Facilitation payments

Certain countries allow what are known as “facilitation payments” as an exception that is permitted under the local law; however, OQ prohibits making such facilitation payments. If you are in doubt about the legitimacy of a payment that you have been requested to make, including facilitation payments, seek the advice of the Ethics and Business Integrity team or legal department.

OQ may be held liable for bribes paid by a third-party agent, consultant, finder, intermediary, broker or other contractor acting on behalf of OQ. Take particular care when evaluating or contracting with a third party who might interact with the authorities on behalf of OQ. You must not engage a third party if there is reason to believe that such third party may attempt to offer or pay bribes.

7.0 Business integrity

OQ’s external relationships are critical to our success. We must deal fairly and lawfully with everyone we encounter.

7.1 Relations with customers, suppliers, and partners

OQ values its partnerships with customers, suppliers, and partners. Treat them in the same manner we expect to be treated with fairness, honesty, and respect.

- Do not engage in unfair, deceptive, or misleading practices.
- Always represent OQ in an honest and forthright manner.

7.2 Market intelligence

Personnel are encouraged to collect, share, and use market information, but to do so only in a legal and ethical manner. Just as OQ values and protects its own non-public information, we respect the non-public information of other companies.

7.3 Acceptable intelligence gathering

It is acceptable to collect market intelligence through publicly available information or ethical inquiries. For example, you may gather and use information from sources such as:

- publicly available filings with government agencies;
- public speeches of company executives;
- annual reports; and
- news and trade journal articles and publications.

You may also accept market intelligence offered by a third party, as long as there is no reason to believe that the third party is under contractual or legal obligation not to reveal such information.



7.4 Prohibited activities

The following basic restrictions apply to our ability to gather market intelligence:

- do not engage in any illegal or illicit activity to obtain market information. This includes theft, trespassing, eavesdropping, wiretapping, computer hacking, invasion of privacy, bribery, misrepresentation, coercion, espionage, or threats;
- do not accept, disclose, or use market information that you know or have reason to believe was disclosed to you in breach of a confidentiality agreement; and
- do not disclose or use market information that is, or you believe should have been, marked “proprietary” or “confidential” without consulting the legal department.

7.5 Trade restrictions and sanctions

OQ must comply with all trade restrictions and sanction controls applicable in the jurisdictions where it operates. Such restrictions may prohibit us from importing or exporting certain items (goods, software, and technology) from / to certain countries or for certain uses and from engaging in certain business activities in specified countries, and with specified individuals and entities.

These restrictions include, for example, prohibitions to do business with natural or legal persons that support sanctioned regimes or to export certain chemicals if there is suspicion that they could be used for chemical weapons. Sanctions for non-compliance can be severe; including fines and imprisonment for responsible individuals, and OQ may be prohibited from further participation in certain trade. Consult the legal department to be certain that you are aware of, understand and follow any applicable trade restrictions and sanction controls.

7.6 Antitrust / Competition Law

Any restrictive agreement or concerted practice involving OQ and a third party which unduly restricts competition is prohibited. Violation of antitrust or competition law may have serious consequences for OQ and involved Personnel, including fines and imprisonment for responsible individuals, and OQ may be prohibited from further market conduct. Beyond that, OQ may have to pay damages to third parties.

Anti-competitive practices concern the exchange of sensitive information with competitors active in the same market that may restrict competition. Therefore, in all contacts with competitors, including social settings, Personnel should not discuss pricing policy, terms and conditions of sale or credit, costs, inventories, marketing and product plans, market surveys and studies, production plans and capacity utilization, allocation or division of territories, customers or products, boycotts, or any other sensitive information.

Antitrust or competition law also regulates OQ’s relationship with our customers, distributors, and suppliers, e.g. in relation to the validity of exclusivity or non-compete clauses. More detailed rules are outlined in the “[Antitrust and Competition Law Policy Manual](#)”.

If you are in doubt about the legitimacy of a proposed business contract or practice, seek the advice of the legal department.

7.7 Know your counterparty

Knowing your counterparty (KYC) is an essential aspect to ensuring that the business is conducted with integrity and in accordance with applicable laws, rules, and regulations. Dealing with counterparties engaged in improper, illegal, or simply questionable business activities can have undesirable consequences for OQ ranging from diminishing OQ’s reputation to legal sanctions. Appropriate care must be exercised in order to be adequately acquainted with all counterparties involved in any material transaction.

7.8 Anti-money laundering

OQ does not support nor facilitate money laundering in any form. To ensure that the risk of money laundering is minimized, and to ensure compliance with the law, we will:

- comply with all anti-money laundering regulations applicable in each of the jurisdictions in which we operate;



- implement appropriate policies, procedures, and internal controls to minimize the risk of money laundering in all our transactions;
- undertake appropriate and reasonable risk-based due diligence on third parties before contracting with them; and
- report any suspicious activity to our supervisor and, if deemed appropriate to the legal department, to report such activity to the relevant authorities.

8.0 Company information

Safeguard OQ's non-public information, which includes everything from contracts and pricing information to marketing plans, technical specifications, and employee information.

8.1 Confidentiality

We shall maintain the confidentiality of information entrusted to us by OQ, except when disclosure is authorized or legally mandated. We shall not use confidential information for personal benefit or to benefit persons or entities outside of OQ. Confidential information includes all non-public information relating to OQ that comes to our knowledge, in written or oral form, irrespective of the media in which it was obtained from.

8.2 Non-public information

Do not disclose non-public information to anyone outside of OQ, including to family and friends, except when disclosure is required for business purposes. Even then, take appropriate steps, such as execution of a confidentiality agreement, to prevent misuse of the information.

Do not disclose non-public information to others inside of OQ unless they have a legal or business reason to know.

We are obliged to protect OQ's confidential information at all times, even after our service to the company ends. If there is any uncertainty over confidentiality issues, the legal department can provide assistance.

Retain or discard company records in accordance with OQ's record retention policies. The legal department may occasionally issue notices regarding retention of records in the case of actual or threatened litigation or government investigation. You must follow the direction contained in these notices, as failure to do so could subject both you and OQ to serious legal risks.

8.3 Business and financial records

Ensure the accuracy of OQ's business and financial records that you are aware of within the framework of your professional duties. These include not only financial accounts, but other records such as quality reports, time records, expense reports and submissions such as benefits claim forms.

Ensuring accurate and complete business and financial records is everyone's responsibility, not just a role for accounting and finance personnel. Accurate recordkeeping and reporting reflect on OQ's reputation and credibility and ensures that we meet our legal and regulatory obligations.

- Always record and classify transactions in the proper accounting period and in the appropriate account and function. Do not delay or accelerate the recording of revenue or expenses to meet budgetary goals.
- Estimates and accruals must be supported by appropriate documentation and be based on your best judgment.
- Ensure that all reports to regulatory authorities are full, fair, accurate, timely and understandable.
- Never falsify any document.
- Do not distort the true nature of any transaction.
- Never enable another person's efforts to evade taxes or subvert local currency laws. For this reason, payments to vendors should generally be made only to the person or firm that actually provided the goods or services.



8.4 Strive for accuracy

All Personnel must strive to be accurate when preparing or conveying any information for OQ. Intentional efforts to misrepresent or improperly record transactions, or otherwise to falsify a company business record, are Code violations.

8.5 Media communication

We must maintain the confidentiality of all information that is entrusted to us except when the information is publicly available.

Inquiries from the press, other media organizations or the public regarding OQ may only be answered by Personnel duly authorized to respond to such inquiries.

8.6 Social media

Our professional activities on social media platforms must be consistent with our Code of Conduct principles. This includes (but is not limited to) the avoidance of any behaviour that would be unacceptable or unlawful in the office at OQ, such as defamatory or libellous contents, the disclosure of confidential company information or conversations which could damage the reputation of OQ.

We must be vigilant while commenting on social media platforms, especially if it is apparent that the individual is an employee of OQ. Statements made on social media can impact the reputation of OQ, even if made in a personal capacity or in what might appear to be a non-public forum.

9.0 Company assets

Protect OQ's assets and use those assets for company business in the manner intended.

Do not use company assets for your personal benefit or the benefit of anyone other than OQ. Always:

- use common sense. The incidental or occasional personal use of company equipment, such as phones, computers or copy machines at your workplace is acceptable. However, excessive personal calls, e-mail or photocopies is a misuse of those assets;
- limit personal use. OQ's policy may allow additional personal use of certain assets, such as a company car or wireless communication device. Always check relevant policies to ensure that you are using company assets as intended; and
- seek permission. Company assets should not be taken out of OQ facilities unless necessary and authorized (as per OQ Delegation of Authority) in connection with company work (i.e. company laptops, phones, or company cars) and be handled with a general duty of care.

Theft of company assets - whether physical theft such as unauthorized removal of product, equipment, or information of OQ, or theft through embezzlement or intentional misreporting of time or expenses - is a basis for disciplinary action, according to the law and company policies. OQ treats workplace theft of assets belonging to other Personnel the same way it treats theft of company assets.

9.1 Use of time, equipment, and other assets

The use of company assets outside of your employment responsibilities - such as using your company work product in an outside venture or using company materials or equipment to support personal interests - requires prior written approval.

- Your time is a company asset during work hours. Do not engage in personal activities during such time that interfere with or prevent you from fulfilling your job responsibilities.
- Do not use company computers and equipment for purpose that could promote violent or criminal activity, or for other purposes that are contrary to the generally accepted ethical principles of our society.



Examples

Some of the more common examples of company assets are set out below (consider this list as not exhaustive).

- Company money;
- Company product;
- The result of your work;
- Computer systems and software;
- Telephones and wireless communication devices;
- Photocopiers, printers, scanners;
- Office consumables;
- Company vehicles;
- Proprietary information; and
- OQ trademarks.

10.0 Health, safety, and environmental protection

We are committed to protecting health and wellbeing. We are committed to an incident and injury free workplace. We are committed to preserving and protecting our environment for ourselves and future generations.

Our Health, Safety and Environment framework requires us to focus on hazard identification, risk analysis and risk management, including identifying low likelihood events that if they happened, could have major consequences.

10.1 Health

OQ recognizes that a healthy workforce is essential to our success and we are committed to preventing occupational illness. Our target is to achieve a significant reduction in new cases year on year through the identification, evaluation and control of workplace exposure and the implementation of health and well-being programmes. For available programmes please consult your focal point at People, Technology & Culture.

10.2 Safety

OQ sets high safety standards for its production facilities to follow all relevant laws and regulations.

Everyone's behaviour contributes to an incident and injury free workplace. Full and consistent implementation of OQ's safety standards, systems and procedures is required wherever we operate. OQ supports the initiatives of its Personnel to continuously improve the safety of its plants.

Our goal is zero harm. We aim to build a sustainable safety culture that requires visible and committed leadership, a high level of participation from Personnel and contractors, the development of learning, and safety in the workplace.

10.3 Environment

As with Safety and Health, we put the environment first. We strive to continuously improve our environmental management programmes and follow or exceed the regulations designed to minimize the environment impact from our business activities.

10.4 Sustainable development

As a responsible corporate citizen, OQ is dedicated to contributing to a robust economy through investing and advancing local communities. Social commitment is a key element of OQ's strategy to develop targeted sustainable programmes to elevate the quality of people's lives. This is achieved through, among other things, the responsible and ethical conduct of business, as well as voluntary outreach, bringing direct and tangible benefits to the communities where we operate (see also our "[Life Saving Rules Corporate Procedure](#)")



11.0 Workplace practices and human rights

We respect the rights and dignity of employees throughout our own operations and those of our business partners.

11.1 Employment

Respect is central to a harmonious workplace, where the rights of individuals are upheld and where their dignity is affirmed, free of intimidation, discrimination, or coercion of any kind.

Therefore, we:

- prohibit discrimination on the basis of ethnic origin, gender, religion, age, politics, or on the basis of any other personal characteristic protected by law;
- value diversity highly, and welcome employees from a wide range of cultures and races, as well as treat genders equally;
- forbid verbal abuse, such as threats, insults or defamatory statements in the workplace;
- do not allow coercion or intimidation in the workplace. Workplace harassment includes threats, bullying, and subjecting individuals to ridicule or exclusion;
- comply with OQ's employment policies including policies relating to official working hours, payroll and other compensation, leave and dress code;
- work to improve employment skills and competencies by regular performance reviews and undertaking education, training and coaching as appropriate; and
- do not tolerate sexual harassment. This may include unwanted attention, sexual jokes, subtle or overt pressure for sexual favours, sexual innuendo, or offensive propositions.

More detailed rules are set out in our "[Disciplinary Code](#)" for the Oman-based office.

11.2 Human rights

We provide high-quality working conditions in compliance with internationally recognized principles on labour and human rights. We:

- do not employ any children under legally eligible age of employment. If local law stipulates a higher minimum working age or mandatory schooling until a certain age, such higher age shall prevail;
- strictly oppose any forced or compulsory labour in all forms;
- are committed to providing a safe and healthy working environment; and
- respect trade unions and the right of workers to organize and bargain collectively; trade union representatives will not be discriminated against.

11.3 Drugs and alcohol impairment

We must not possess or consume illegal drugs or be impaired by alcohol or (illegal or prescription) drugs while working on company premises. For the safety, wellbeing, and productivity of our Personnel, it is essential that we make the best decisions. Therefore, our judgment must be clear and unimpaired by (illegal or prescription) drugs or alcohol at all times.

11.4 Data protection and information management

At OQ, we process personal data responsibly and in compliance with all applicable data protection rules, and regulations. Personnel that handle the personal data of others must:

- obtain consent and act in accordance with such laws, rules and regulations;
- respect privacy and process data with any relevant contractual obligations;
- collect, use, process and transfer information only for legitimate business purposes;



- limit access to data or information by appropriate organizational and technical means to those who have a legitimate business purpose for using the information; and
- take care to prevent unauthorized use and disclosure.

In many countries, laws exist for the protection and secure storage of personal data. Some countries permit the transfer of personal data across their border only if the recipient has committed to (and actually implements) procedural safeguards to ensure an equivalent level of data protection and data security.

If any uncertainty arises as to whether or not information may be collected, processed, used, stored or transferred, seek the advice of the OQ Group Data Protection Officer.

More detailed rules are set out in our [“Data Protection and Information Management Policy Manual”](#).

12.0 Whistleblowing

12.1 Raising concerns

OQ is committed to providing a workplace conducive to open discussion of its business practices. It is OQ’s policy to comply with all applicable laws, rules, regulations and standards that protect its Personnel against discrimination or retaliation as a result of their lawfully reporting information regarding, or their participating in, investigations involving potential violations of the Code.

We all have an obligation to uphold the ethical standards of OQ. If you observe behaviour that represents a violation of the Code, you are expected to raise the issue promptly. Doing so will afford OQ an opportunity to deal with the issue and take corrective action, ideally before it becomes a violation of law or a risk to health, security, or the reputation of OQ.

More detailed rules are set out in our [“Whistleblowing Policy Manual”](#).

12.2 Resources

For raising issues and concerns, your primary point of contact is any member of the Ethics and Business Integrity team who are individually bound to keep your identity secure and confidential. If for any reason you prefer to raise any issues or concerns through an external channel, you have the option to turn to OQ’s anonymous whistleblowing system.

OQ will consider all raised issues and concerns and launch an investigation when so warranted to establish their validity and ensure that appropriate action is taken where necessary. Some concerns may be resolved without the need for investigation. If urgent action is required, this may be taken before an investigation is conducted.

All investigations and their progress are treated confidentially.

12.3 No retaliation

OQ values the help of individuals who identify potential problems that OQ needs to address. Such concerns will be treated in confidence. The identity of individuals reporting an alleged violation will be held in confidence unless otherwise required by law.

Personnel who report non-compliance under this Code shall not be adversely treated because of the making of the report. Any attempt to prevent Personnel from fulfilling their duty to supply information will be considered a breach of the employment contract.

If you work with someone who has honestly raised an issue or concern, you are expected to continue to treat the person with courtesy and respect. If you believe someone has retaliated against you, report the matter to the Ethics and Business Integrity team.

12.4 Making imprudent or false accusations

OQ will protect any person who honestly raises an issue or concern, but it is a violation of the Code to make claims without a credible basis or to knowingly make a false accusation. Honest reporting does not mean that you have to be right when you raise an issue; but the issue must be sensible, and you have to reasonably believe that the information you are providing is accurate.



Definitions

- **Company assets:** All resources, both tangible and non-tangible, including data and intellectual property, that are owned by OQ.
- **Company information:** All non-public information relating to OQ, in written or oral form, irrespective of the media in which it is stored or derived from.
- **Conflicts of Interests:** When an individual or corporation has the opportunity – real or perceived – to exploit their position for personal or corporate benefit.
- **Gift:** Anything of value, including - but not limited to - meal vouchers, lodging, loans, cash, favourable terms or discounts on any product or service, services, equipment, prizes, products, transportation, use of vehicles, vacation or other facilities, stocks or other securities, home improvements, tickets, gift certificates, gift cards, discount cards, memberships and employment or consulting relationships.
- **Money laundering:** Process of concealing the real origin of money generated from illegal activities to make it appear as if it was derived from legitimate sources.
- **OQ:** Any company in which OQ S.A.O.C. has a direct or indirect controlling interest.
- **Personnel:** Any employee, officer and executive staff employed with or appointed to OQ, as well as any agent or person working under contract that occupies a permanent or temporary position within OQ, such as seconded staff or staff sourced from manpower contractors.
- **Relative:** With respect to any Personnel, the spouse, children, siblings (whether by the whole or half-blood including adopted children and step siblings), lineal descendants and ancestors (e. g. parents, grandparents, grandchildren) and in-law's, cousins, sibling's lineal descendants (e.g., nieces or nephews) and parent's siblings (uncles, aunts).

RELATED POLICY DOCUMENTS AND SUPPORTING DOCUMENTS

Policy	Code of Conduct
Policy manuals	Anti-Bribery and Corruption Prevention Policy Manual Antitrust and Competition Law Policy Manual Data Protection Policy Manual Whistleblowing Policy Manual
Process	Manage Gifts and Entertainment Process
Procedures	Not Applicable
Related documents and forms	Acknowledgment of Compliance with the Code of Conduct Gifts and Entertainment Declaration Form Gifts and Entertainment Request Form Conflicts of Interest Declaration Forms Other Work (Outside Employment) Declaration and Approval Form