

## Scope

This is an internal corporate compliance policy document, covering all INDEVCO Group Affiliates, Employees, Consultants and Advisors working at the headquarters and at INDEVCO service units departments, manufacturing plants, and commercial companies worldwide, who are obliged due to their work or other to use the fundamentals of ethical trading in accordance with this policy.

This Policy is considered as guideline for the internal Bylaws related to each affiliate member of INDEVCO Group.

## Purpose

In line with INDEVCO Group philosophy, we are committed to achieve the highest standards of ethical trading through our comprehensive supply chain and business operation units. Consequently, our Ethical Trading Policy is based on a fundamental review of the compliance of our business with ethical values and principles in accordance with national laws in the countries where we operate. This policy expresses the purposes that uphold safe and fair working conditions for employees and confirms as well that our Management is socially & environmentally responsible within the company and all the supply chain of the business.

## Policy Statement

INDEVCO Group recognizes that its commercial and industrial operation has potential to impact employees, suppliers, local community and customers. Therefore, and as far as is reasonably practicable, we ensure that our affiliates, their employees, suppliers and their sub-contractors, comply with the below fundamentals:

### **1. Employment is freely chosen**

There is no forced, bonded or involuntary labor. Workers are free to leave the companies after a reasonable notice as per national laws.

### **2. Working Conditions Are Safe and Hygienic**

A safe and hygienic working environment shall be provided. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with or occurring in the course of work. Workers shall receive appropriate health and safety training, and such training shall be repeated for new or reassigned workers. Accommodation, where provided, shall be clean, safe and meet the basic needs of the workers.

### **3. Child Labor Shall not be Used**

There shall be no use of child labor which shall be exploitative or shall jeopardize the health, safety, educational development or morals of any child. No person below the age of 16 is employed by our affiliates. If the local legal minimum age for work is higher than 16, we employ no one younger than the legal minimum age.

### **4. Living Wages Are Paid**

**Over 50 years of Industrial Development & Management Services**

Wages and benefits are paid in line with national laws and shall always meet or exceed the minimum wage. All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

**5. Working hours are not excessive**

Working hours comply with national laws and known benchmark industry standards and shall not be excessive. Working overtime hours is rewarded as per national laws.

**6. No Discrimination Is Practiced**

There shall be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, or political affiliation. We believe in equal opportunities for our employees without any kind of discrimination and all employees shall be treated equally.

**7. No Harsh Or Inhumane Treatment Is Allowed**

Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be expressly prohibited.

**8. No bribery or corruption is permitted**

No bribes shall be paid or accepted to give or receive business. No corruption, blackmailing or bullying is permitted.

**9. Follow good environmental practice**

We aim to meet relevant national and international environmental laws and regulations and to continuously improve environmental practice.

**10. Products manufactured**

We ensure that products manufactured and sourced by INDEVCO Group affiliates are produced under working conditions that are hygienic and safe.

**11. Employment Agencies**

This Ethical and Trading Policy applies to all affiliates in all operational divisions of INDEVCO Group in addition to the Staff directly employed by the affiliates, on temporary or permanent contracts, or employed by the contractors or Employment Agencies who shall demonstrate commitment to and application of the requirements of this Policy.

Employment Agencies contracted to supply temporary staff shall ensure that all staff supplied to INDEVCO Group affiliates are eligible to work as per the national laws in each country.

## Reporting

Should there be any doubts or uncertainties about ethical trading issues, you can contact, in the first instance, the Department Manager, or the Human Resources Department for guidance and assistance. For any clarification about Ethical Trading related questions pertaining to legal use, employees may e-mail INDEVCO Group Legal Department: [roger.tanios@indevcogroup.com](mailto:roger.tanios@indevcogroup.com) or call +961-9-230130 Ext. 2306.

## Discipline & Consequences

As per the internal company by-laws and related disciplinary policies, the violation of this Policy is subject to formal reprimand, disciplinary action, depending on the seriousness of the violation and as per the administration sole discretion.