



Code of Ethics & Business Conduct

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Introduction

United Group is a distinctive leader in the business community, leveraging its scale and global presence to drive innovation and embrace calculated risks in the markets we serve.

By actively listening and learning, we anticipate challenges and respond with solutions that exceed customer expectations while building lasting partnerships.

Rooted in the foundational values of Saudi society, **We Uphold:**



▶ Ethics



▶ Accountability



▶ Commitment



▶ Proactive Behavior



▶ Ambition

- ▶ These principles guide how we operate, fostering trust and long-term success.
- ▶ Our Code of Conduct provides clear guidelines for ensuring that employees, directors, and contractors act with integrity and align with our values.

Introduction



We encourage all team members to embody these principles daily and to refer to this Code as a practical guide. If you have concerns or suspect a violation, your voice matters. Speak up confidently, even anonymously, knowing your input strengthens our shared commitment to excellence.

Together, with unwavering ethical standards, we aim not just to lead our industry but to do so with integrity, reflecting the values of the Kingdom and its vision for progress.

At Our Core



Putting Our Trust in Our People



Taking Responsibility for What We Do

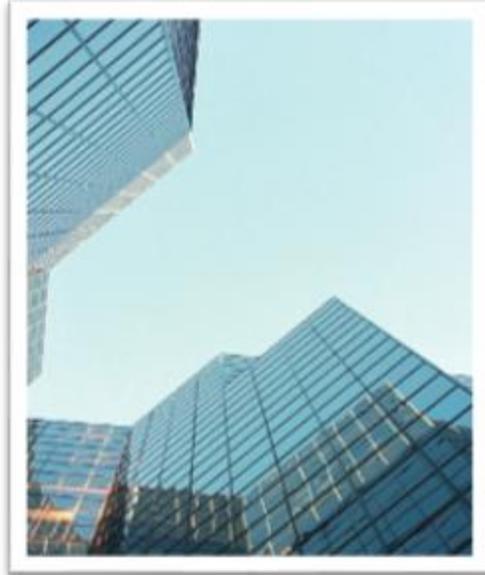


Living Our Values



Speaking Up When Something Isn't Right

At Our Core



In our ever-changing business environment, it's important that we remain rooted in who we are as United Group. Our Code and our Values guide and inspire us along the way.

At Our Core We Put Our Trust in Our People & Our Code

Our Code is the foundation for all we do. It incorporates our Values and helps inform our everyday actions.



How Do We Put Our Values Into Practice?

If you're reading this, chances are, you've discovered that no two days at United Group are the same, and we are moving at a rapid pace to stay [Ahead Of What's Next](#).

There are hundreds of situations that can come up during a typical workday that we've never dealt with before and require quick responses - some of them involving ethical dilemmas. And because we are a team, every decision one of us makes can impact someone else which in turn can affect our whole company. Consequently, it's important that we get things right.

How Do We Put Our Values Into Practice?

“**Our Code is here** to help and provide you guidance. It gives us the tools we need to **make the right decisions**, regardless of the challenges we might face. It can help us answer common questions like – Is that a kind gesture or a bribe? Should I disclose this? How can I better protect myself and my coworkers? And more...



How Do We Put Our Values Into Practice?

“Although the Code covers many situations that can arise in our workplace, it’s important to keep in mind that it cannot cover every possible scenario. No document could do that. We look to it instead as a guide that provides key takeaways and fact-based examples.

When we pair our knowledge of the Code with good judgment and common sense, **while never being afraid to Speak Up**, we put our Values into practice.



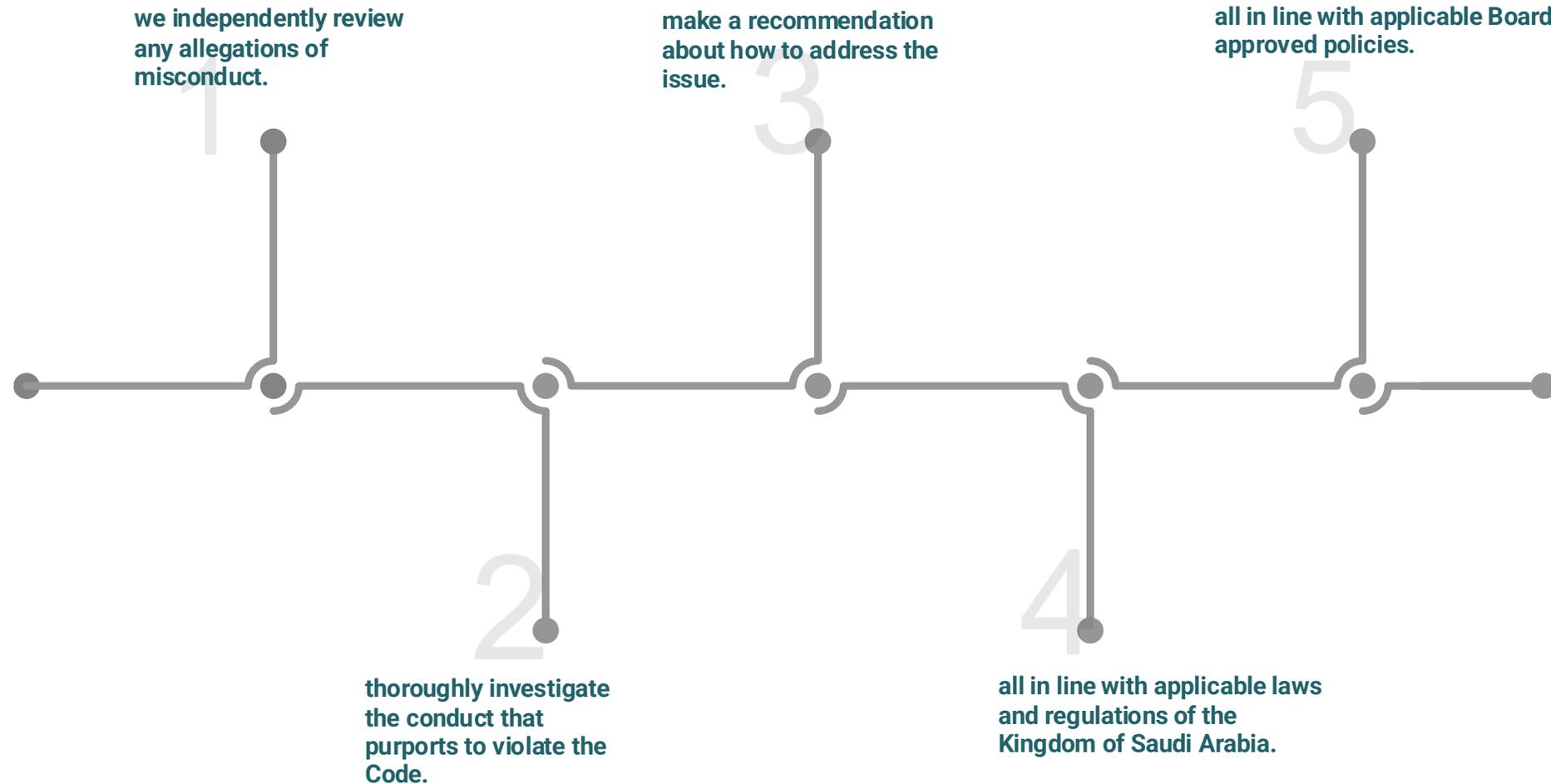
Who Must Follow the Code?

We all do It applies to everyone, at every level of United Group, and to every person, entity, and organization working with us, for us, and on our behalf.



How Do We Respond to Potential Violations of the Code?

Before we hold someone accountable for violations of the Code:

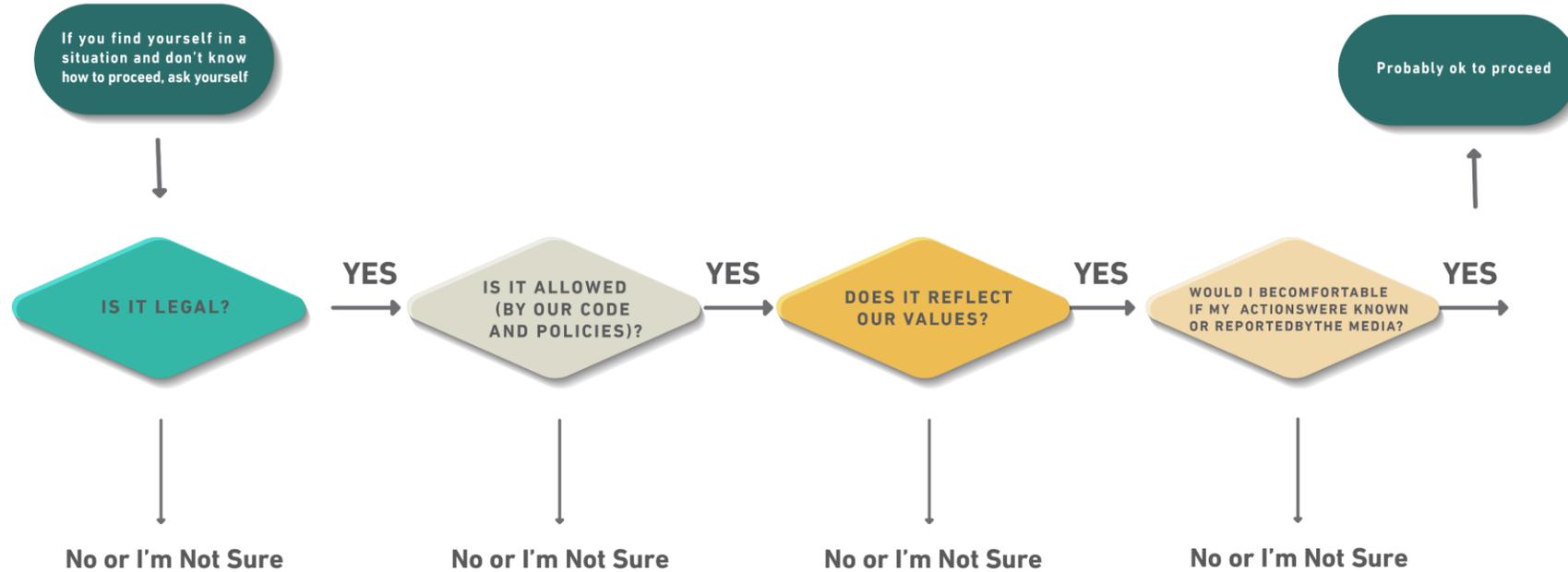


What are the Consequences of Violating the Code?

- Violations reflect poorly on all of us and make it less likely that our customers, our business partners, or our investors will want to do business with us.
- That's why we must take violations very seriously and hold each other accountable. We must send the message that we don't tolerate bad behavior and that bad actors are simply that – individual actors who don't reflect our Values.
- If someone violates the Code, it can result in disciplinary action, representative to the magnitude of the violation including the loss of their job. Depending on how serious the incident is, there can even be criminal consequences. Worse yet, it can instantaneously jeopardize the hard work each one of us does every day to build the reputation of the United Group brand.

How Do I Follow the Code?

Let it guide your decision-making.



STOP ! Speak Up and Ask Someone for Help.

At Our Core **We Live Our Values**



How Do I Follow The Code?

At United Group, it's not just about what we do, it's about how we do it, which is our competitive advantage. We build an integrated and sustainable system that guarantees food security while adapting to continuous changes, maintaining the excellence of our brand and product quality, and earning our customers' trust through commitment, trust, and responsibility.

How Do I Follow The Code

We strive to achieve this while making an ethical impact, guided by our core values of integrity, Quality and Authenticity, Teamwork, building strong relationships, commitment, and promoting a sense of healthy living:



Quality and Authenticity

Quality and Authenticity a constant, uncompromising essence with the passage of time and data differences.



Teamwork

Teamwork the fastest and most successful way to achieve the goal.



Building strong relationships

Building strong relationships, a sail of trust that leads us to the meaning of life.



Integrity

Integrity is the foundation and the bedrock upon which everything else is built.



Commitment

Commitment is the effort, the quality of performance and the fulfillment of the promise.



Promoting a sense of healthy living

Promoting a sense of healthy living the most important principle, purpose and destination.

**At Our Core We Take Responsibility
for What We Do**



We Have a Collective Responsibility to Live Our Values

To help put them into action, let's each find ways to:



Constantly reflect on whether we are working within our Values.



Ensure our day-to-day activities are in line with our Code, our policies and the law.



Apply good judgment and common sense.



Reach out to supervisors or coworkers for advice when needed.



Speak up when we think something isn't right.



Be cooperative, honest and transparent.



Help others when we are confident that we can lead them in the right direction

Supervisors Have Additional Roles and Responsibilities

As supervisors, we are always:



Set the tone – be a leader for the team when it comes to integrity.



Stay current on all ethics-related trainings and ensure our team does as well.



Encourage others to share ideas, questions and concerns and keep an open-door policy.



Guide coworkers to the right resource if we don't know the answer to a question.



Report potential misconduct and escalate reports to the appropriate people when necessary.



Prevent retaliation against anyone who reports a concern in good faith or participates in an investigation.

At Our Core We Speak Up when something isn't right

Violations of our Code, our policies or the law can hurt us individually and as a Group. To protect each other, we speak up whenever we become aware of or suspect that something is wrong. Even if we are unsure, we know that speaking up is always the right thing to do.



How Do I Follow The Code

When we know of or suspect a violation of:



Our Values or Code



Our policies and procedures



Any applicable law or regulation

How Do We Speak Up?

When you have an ethics-related question or concern to report, you can access our independently managed Compliance and Whistleblowing line, **SAWTAK** to report with confidence, and anonymously if you choose, through the different channels provided.

Your communications with the **SAWTAK** hotline can be Anonymous, Confidential or Open, depending on your personal preferences. You can [Reach Out By Accessing The SAWTAK Hotline Channels](#), which include:



We Speak Up When Something Isn't Right



What Happens After We Speak Up?

Your concerns are promptly addressed and investigated, and the information you provide is shared only with the people who need to know in order to help investigate and resolve the issue.



Can We Speak Up Without Fear Of Retaliation?

Absolutely. United Group doesn't allow any form of retaliation against anyone who reports a genuine and bonafide concern, makes a complaint in good faith or cooperates in an investigation.



Our People



Valuing Diversity and Inclusion



Putting Safety First



Respecting Others

Our People



At United GROUP , Our Values matters, and our people always come first.

Our People We respect others



We Respect Others



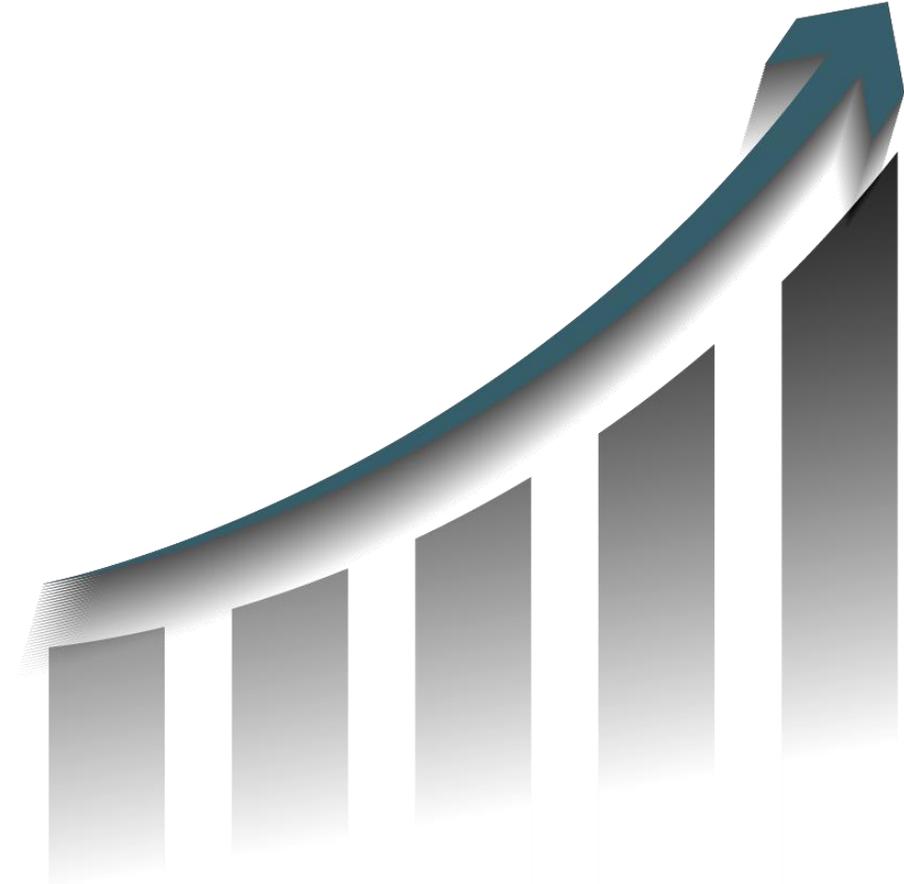
Our Promise

To uphold our values and to continuously foster a welcoming, and nurturing community



Our Process

Our greatness comes from our commitment to our Saudi cultural and our corporate values. And whilst we're fortunate to have a talented team of people with various backgrounds, experiences and skill sets, we don't stop there. We make sure that each of our unique team members feels valued, included and respected. Doing so encourages the productivity we need to best serve our customers and investors and we make our workplace a better and engaging pace for all.



Our Process

- **We focus on what matters.** When making an employment decision, we look at job-related criteria and individual qualifications and fit.
- **We help each other.** We provide reasonable accommodations for candidates and employees with special situations such as disabilities, pregnancy, childbirth and/or related medical conditions. If any of these circumstances make it hard for someone to do their job, we are committed to work with them and make the appropriate changes.
- **We bring out the best in each other.** Bringing out the best in others often requires bringing out the best in ourselves first. That's why we always strive to be honest, fair, constructive and kind. When we treat each team member with respect, we get to benefit from their individual viewpoints, ideas and talents.

Think About it



Question

Based on derogatory comments I overheard from her supervisor; I believe a coworker may have been turned down for a promotion because of her recent announcement that she is getting married ... Should I say something?



Answer

Definitely. Job decisions should be based on a person's abilities. By speaking up, you're not only helping us stay welcoming and inclusive by championing our Values, but you are also making sure we are following the law.



Our People **We value diversity and inclusion**



We Value Diversity and Inclusion



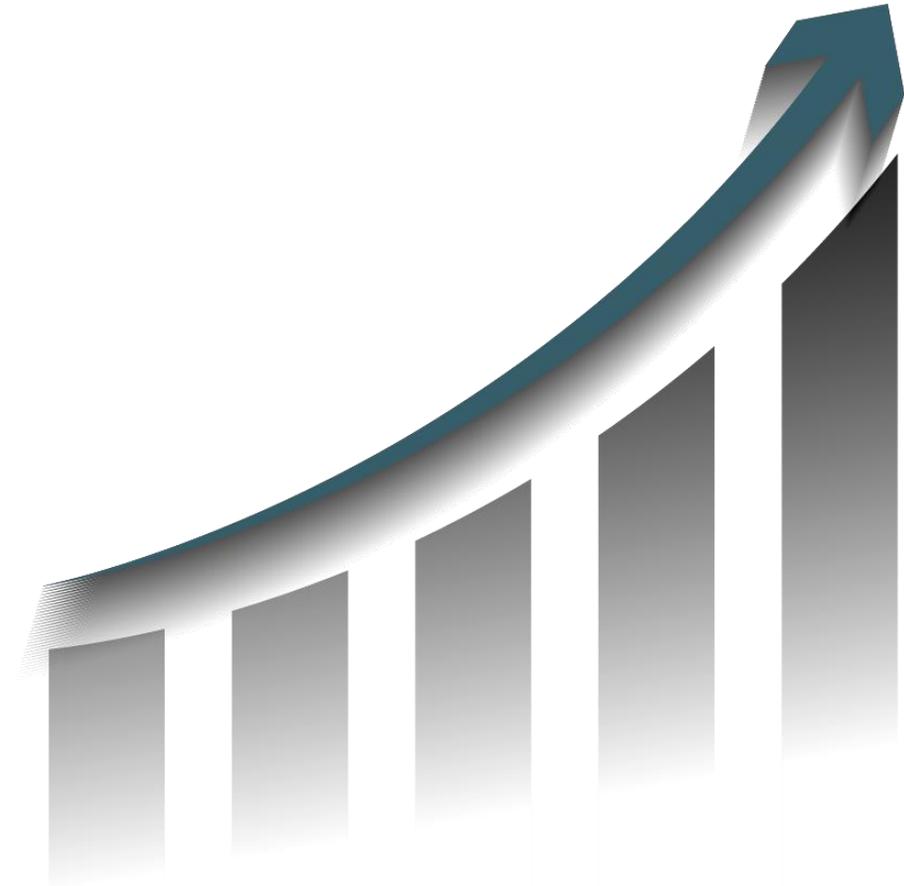
Our Promise

To promote an environment that's free of harassment, bullying and abuse



Our Process

We value you – not just the work you do – so we want to make sure you feel safe and respected. That's why we have a zero-tolerance policy for harassment. By not tolerating bad behavior and speaking up whenever someone is being treated unfairly, we help maintain a positive and productive workplace for everyone, everywhere.



Our Process

We know what harassment looks like. To put a stop to harassment, we must be able to recognize it first. Harassment is considered intimidating, hostile or offensive conduct that:

- Interferes with someone's ability to work, or.
- Creates a hostile work environment.

This is particularly the case if it's based on a characteristic protected by law, like a person's race, age, gender or religion.

We are aware of perceptions. Harassment doesn't have to be intentional to be unacceptable. In other words, saying, "That's not what I meant" won't excuse unacceptable behavior. So be aware of how your words and actions may impact others.

We get involved. We **speak up** if we become aware of harassing or unfair treatment, or if we've experienced it ourselves.



Our Process

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What are Some Examples of Harassment?



Ethnic jokes, slurs or gestures.



Threats or intimidation.



Stalking.



Bullying



Sharing offensive material.



Trying to force someone to do something

Our People We put safety first



We Put Safety First



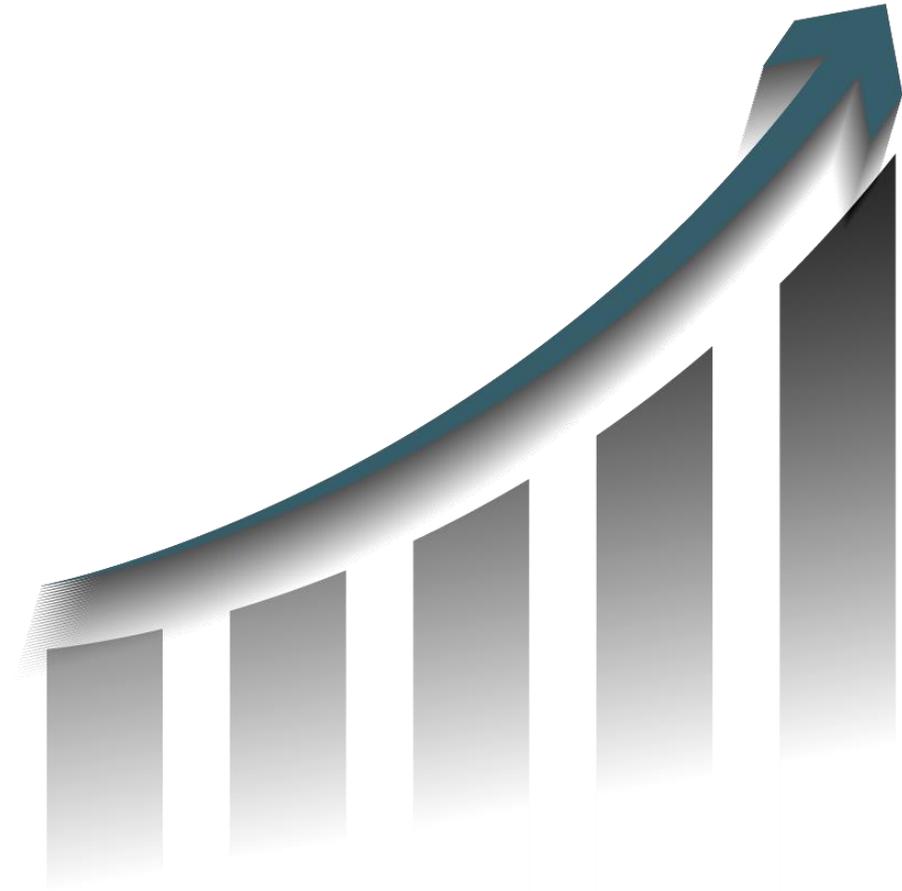
Our Promise

To help ensure each of us ends our workday at the United Group site ready to spend quality time with our loved ones.



Our Process

We never lose sight of what matters most – each other. That's why we put safety first by staying alert, following safety procedures and protocol and looking out for each other in all that we do.



Our Process

- ❑ **We bring our best to work.** Apart from being a serious violation of our cultural values and local regulations, the abuse of alcohol, drugs (illegal or legal) or other substances in and outside of the workplace can impair performance and is a serious threat to health and safety.
- ❑ **We are fully committed** to ensure that all our workplaces are completely “Alcohol and Drugs Free”. This includes the requirement for employees to be free from any side-effects of legal or illegal drugs or controlled substances that could prevent you from carrying out your work safely.
- ❑ **We strive to maintain working conditions** which are safe, healthy and in compliance with applicable laws for our employees and visitors in our premises.
- ❑ **We watch out for signs of workplace violence.** It’s important for us to remember that workplace safety goes beyond avoiding hazards – it’s about paying attention to our coworkers’ behavior as well. Ways we prevent workplace violence include:
 - Speaking up immediately if we see any threats or warning signs of workplace violence
 - Preventing unauthorized access into our facilities
 - Never carrying prohibited weapons into our facilities

We protect each other

Each of us has a part to play in maintaining a safe workplace, including:



Watching out for hazards



Taking the appropriate trainings



Only taking on tasks for which we are trained



Complying with Health & Safety Policies



Following posted warning signs and restrictions



Wearing any necessary personal protective equipment



Reporting unsafe conditions or injuries right away

Think About it



Question

A new maintenance technician wants to access the roof of one of our buildings because of a big wind storm the night before. They haven't yet received the appropriate safety training but just want to take a quick look. No big deal, right?



Answer

Wrong. Following all workplace safety rules, no matter how big or small, is critically important. Allowing any violation undermines our promise to help ensure each of us ends our workday at the GROUP armed so we can spend time with our loved ones.



What are some warning signs of workplace violence?



Mood swings



Paranoid or erratic behavior



Pacing, yelling or screaming



Verbal abuse or threats



Persistent complaints about being treated unfairly



Poor relationships with coworkers or management

Our Group



Keeping accurate records



Protecting what's ours

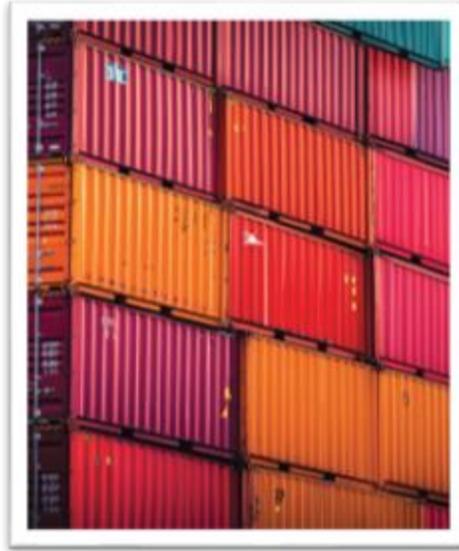
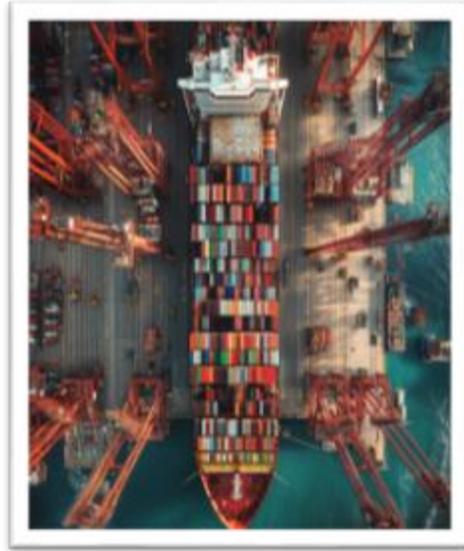


Keeping private information private



Avoiding conflicts of interest

Our Group



Our Group's success is based on our Values— nothing more, nothing less. At United GROUP, we work ethically and maintain high standards to stay **Ahead of What's Next.**

**Our Group We keep accurate
records**



We Keep Accurate Records



Our Promise

To make sure that our books and records accurately reflect our business.



Our Process

With numerous assets, investments, customers and employees, and more importantly a hardly built reputation, we have a lot to keep up with. So, it's crucial that we maintain good records in accordance with applicable standards and documents retention policies. Doing so is at the heart of our business. When we record details in a timely and accurate way, we make smart financial decisions and stay on the right side of the law.



We protect each other



Watching out for hazards



Taking the appropriate trainings



Only taking on tasks for which we are trained



Complying with Health & Safety Policies



Following posted warning signs and restrictions



Wearing any necessary personal protective equipment



Reporting unsafe conditions or injuries right away

We record carefully

To keep our business records as accurate as possible, we:



- ▶ Record carefully, completely, honestly and in ways that are easy to understand.



- ▶ Keep everything that supports what we record.



- ▶ Never let anyone pressure us into recording something that's not true.



- ▶ Report any suspicions of fraud or other wrongdoing right away.

- ▶ **We keep the law in mind.** It's important that we all have a good idea of what's legally required in our industry and area of operation.



What are some examples of business records?

There are lots of different types of business records, including:



Sales orders and contracts



Financial Statements



Expense reports



Payroll records



Purchase orders



Sales data



Think About it



Question

Our sales representative has secured a large order from a new customer. The customer has requested an expedited production schedule to meet their urgent needs. Should we always try to accommodate our customer?



Answer

Yes, we should always strive to accommodate our customers. However, it is crucial that our records accurately reflect our actions. In this case, the sales representative should collaborate with the Production and Quality Teams to adjust the production schedule and ensure that all necessary contractual and safety provisions are in place.



Our Group We Protect What's Ours



We Protect What's Ours



Our Promise

To take good care of what's ours.



Our Process

When thinking of our Company assets, our buildings may come to mind first, but they cover much more than that. From the chair you may be sitting in right now to the laptop you use every day to our Silos and Manufacturing plants – our assets include every single thing we own or use to do business, and it's our job to protect them and use them with diligent care.



Our Process

- ❑ **We handle physical assets with care.** We work to protect physical assets from damage, loss, misuse and theft. And we only borrow, lend, sell or give away items if we have authorization to do so.
- ❑ **We secure data.** In a world where our business is becoming more data-driven and data analytics drive value, we want to make sure we preserve our rights to keep what data is ours and obtain the appropriate permissions to collect data that impacts our buildings
- ❑ **We use common sense.** United GROUP and its subsidiaries have a responsibility to monitor Group systems and devices (such as computers and phones) for certain content to protect coworkers and customers. For this reason, although occasional personal emails or phone calls are permitted, it's important to remember that anything we write, download, store or transmit on Group equipment may be monitored or reviewed in accordance with applicable Group policies and laws.
- ❑ **We secure all electronics.** We take the appropriate measures to keep our technology assets safe, such as:
 - ▶ Following Company guidelines
 - ▶ Protecting user IDs and passwords
 - ▶ Never opening suspicious emails
 - ▶ Never installing unauthorized software

What are some examples of assets?

There are a few different types we should protect, including, for example:



Physical assets, such as buildings, company vehicles and office furniture



Technology assets, such as phones, computers and office equipment



Financial assets, such as cash and bank accounts



Informational assets, such as emails and corporate records



Intellectual property such as logos and trademarks

**Our Group We Keep Private
Information Private**



We Keep Private Information Private



Our Promise

To respect and protect personal and confidential information.

Our Process



The information in our care is part of our Company's strong foundation. With it, we can cater better to our customers, hire ideal candidates and maintain our competitive edge. That's why safeguarding it is so important.



Our Process

❑ **We protect informational assets.** We never share personal or confidential information with unauthorized people, including anyone within our Company who doesn't need it to do their job. When we do need to share it, we seek appropriate approval first. Personal and confidential information includes such matters as:

- ▶ Private information, like someone's employment, medical, financial or education history.
- ▶ Intellectual property, like ideas, creative work, formulations, production schedules, know-how and trade secrets, etc.
- ▶ Proprietary information, like business plans, marketing strategies and customer & suppliers lists.
- ▶ Financial information, like budgets, forecasts and quarterly results.

❑ **We follow the rules.** We comply with all records management policies when labeling, handling, storing and disposing of personal and confidential information.

Our Process

- ❑ **We remain diligent.** We know that information can leak in many ways – intentionally and non-intentionally – so we don't discuss anything private in a public setting, and we don't leave personal or confidential information in a place where someone else could access it.
- ❑ **We respect the information of others.** We use the same standard of care when handling the personal and confidential information of others as we would our own. We also only acquire such information in appropriate ways and with the proper authorization in accordance with applicable laws.
- ❑ **We remain loyal.** The responsibility to protect personal and confidential information doesn't end if our employment does. That's why we never share United GROUP personal and confidential information with other employers if we leave. We also never ask or expect new United GROUP employees to share the personal or confidential information of former employers with us

Think About it



Question

One of my coworkers is home on maternity leave. A supplier asked me for her personal phone number to discuss a business matter and send a card. That would be a nice thing to do—right?



Answer

Although well-intentioned, you shouldn't share a colleague's personal phone number or home address with anyone without consent. A better approach would be to suggest that the supplier send an email and forward the card to the office. She will appreciate the thoughtfulness just as much.



Our Group We avoid Conflicts of Interest



We Avoid Conflicts of Interest



Our Promise

To promote loyalty and our shared success.

Our Process



We all have interests, activities and relationships outside of United Group. However, there are times when these personal interests can create—or appear to create—a conflict of interest with our Company. This can damage the trust of those who invest and believe in us. As a result, we each have an obligation to act in the best interest of United Group.



Our Process

❑ **We practice prevention.** We do all that we can to know and avoid the kinds of situations where conflicts of interest often occur. Examples of conflicts include:

- ▶ Hiring a company owned or controlled by United Group director, employee or any of their family members
- ▶ Owning, or having a substantial interest in, a customer, competitor or supplier to United Group
- ▶ Working for or with United Group competitor, supplier, vendor or agent
- ▶ Receiving improper personal benefits because of your position with United Group

❑ **We speak up.** Most conflicts can be avoided or mitigated if they are disclosed. Whenever we may have an actual, potential or perceived conflict of interest, we know the best next step is to disclose it to our supervisor, or the Governance Department right away.

- Supervising or making employment decisions about a loved one, family member or spouse
- Conducting outside work with a business partner, competitor or any other organization that does (or seeks to do) business with United Group.

What is a “conflict of interest”?



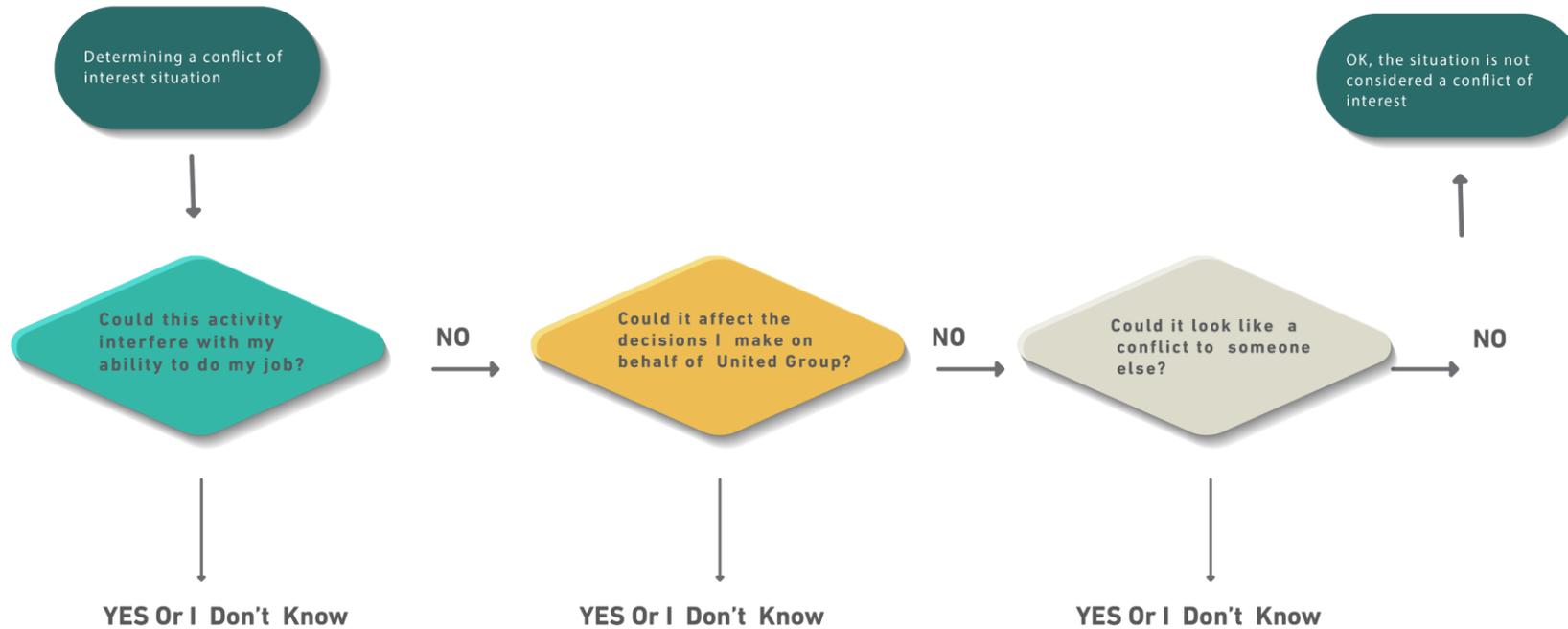
Answer

A **conflict of interest** occurs when our personal interests (or the interests of a family member) work against – or even appear to work against – the interests of United Group.



We Avoid Conflicts of Interest

We ask the right questions. Spotting a conflict of interest is not always easy. That's why it helps to ask:



there may be a potential conflict. We should seek guidance from our supervisor Human Resources or the Ethics Committee before proceeding..

Think About it



Question

One of our third-party vendors tells me that my supervisor is on the board of directors for their company. When I ask my supervisor about it, he says that it's nothing to worry about. What should I do?



Answer

Speak Up Inform Human Resource. We each have a responsibility to not only disclose our own potential conflicts, but to speak up if we suspect that others have conflicts as well.



Our Customers



Marketing honestly



Protecting our reputation



Using social media responsibly

Our Customers

Where others measure success in transactions, we invest in relationships and work tirelessly to help our customers stay **Ahead of What's Next.**

Our Customers

Marketing honestly



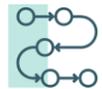
Marketing honestly



Our Promise

To build our reputation and our brand.

Our Process



We do everything with integrity – and that includes marketing and advertising our offerings and services. To us, integrity in advertising means providing accurate, fair and balanced information that highlights the benefits and risks of our offerings. Only by marketing honestly can we build trusted lifelong partnerships with our customers.



Our Process

- ▶ **We say what we mean.** Our advertisements offer a great opportunity to tell our story – and we do so honestly, fairly and responsibly. We avoid any messaging that could be misleading and never promise something we can't deliver. We offer an excellent value proposition, so there is never a need to overstate our services or products.
- ▶ **We know what's required.** We market accurately, fairly and honestly not just because it's required by law, but because it is in the core of our Values. If we are unsure of any matter, we know to consult with the Legal Team or Compliance Team.
- ▶ **We take the time to double-check.** Our Marketing Team makes sure to get proper approval for every advertisement and double-check every statement or promise.

What are some examples of bad marketing?

Some things we never do include:



Using scare tactics



Bad mouthing our
competition



Exaggerating our abilities



Leaving out something
material



**Our Customers We Protect Our
Reputation**



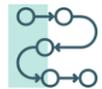
We Protect Our Reputation



Our Promise

To ensure our messaging is clear, accurate and consistent.

Our Process



We've spent decades building our reputation, but we know it can be damaged in moments with a careless word or communication. That's why we have a team of individuals who specialize in sharing information about our Group of Companies and responding to inquiries from the media, government, investors and general public.



Our Process

- ▶ **We rely on the experts.** Unless designated as an official company spokesperson, we don't speak on COMPANY/GROUP s' behalf. Instead, we direct inquiries to the proper resource.
- ▶ **We use our voice responsibly.** We seek approval before participating in any speaking engagements and before publishing any articles on behalf of our Company.
- ▶ **We protect our reputation, while protecting employee rights.** We follow the laws that govern public speaking about matters of public concern and to engage in activities related to the terms and conditions of employment. Nothing in our Code or our policies is intended or should be construed to interfere with or limit legal rights in that regard..

Who are the designated spokespeople in our Company?

For Questions:

From The
Media

contact Corporate
Communications

From The
Government

Contact Corporate
Communications

About Financial
Matters

contact Investor
Relations

About public
speaking &
events

contact Corporate
Communications

About charitable
donations

Contact The
Compliance Team

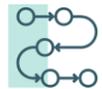
We use social media responsibly



Our Promise

To promote honest and ethical online communications.

Our Process



We believe that social media offers a great way to build relationships, exchange ideas and share information about our Company. However, we must do so responsibly. When posting, we use good judgment and act in ways that are consistent with our Values, our policies and the law.



Our Process

- ▶ **We take responsibility for what we post.** When re-sharing company-related content to our personal social media profiles, we make it clear that we are speaking for ourselves and not on behalf United Group.
- ▶ **We communicate with respect.** We have zero tolerance for cyberbullying and the use of social media to intimidate, harass or discriminate against fellow employees or members of our community. We don't use ethnic slurs, personal insults, obscenity or engage in any conduct that would not be acceptable in the workplace or our local community.
- ▶ **We protect confidential information.** We know never to share confidential or other proprietary information about United Group or a customer, partner, investor or supplier. We never discuss sensitive topics like our business performance, Group's plans or financial information publicly unless appropriate prior approval is obtained.
- ▶ **We respect copyright.** We do not post content that does not belong to us. Before posting anyone else's work, we check with the owner in order to get permission first.

How do we “take responsibility for what we post”?



Answer

It's often as simple as adding a disclaimer that says, “The statements on this site are my own and do not reflect United Group's positions, strategies or opinions.”



Our Business Partners



competing fairly



good business partners



**cooperating with government agencies
and complying with their requirements**

Our Business Partners

We take the time to get to know our partners —we understand their needs, recognize their aspirations and operate in ways that make them proud to do business with us.

Our Business Partners **We compete**
fairly



We compete fairly



Our Promise

To earn business based on the quality of our offerings and services, not unfair practices.



Our Process

We stay ahead of the game by generating fresh ideas and finding new ways to do business, not by working unethically to push others out of the market. That way, not only do we keep our customers – we keep them happy.



What do we mean by “agree”?

An “agreement” with a competitor, customer or business partner could come in many forms, including something:



Stated or implied



Oral or in writing



Direct or indirect



Our Process

❑ **We avoid improper agreements.** We are careful in conversations with competitors, customers or business partners and never agree to:

- ▶ Fix prices (by raising, setting or lowering them)
- ▶ Illegally split up markets, territories or customers
- ▶ Inappropriately prevent another company from entering the market
- ▶ Improperly influence the outcome of a competitive bid
- ▶ Unfairly restrict production, sales or output

▪ **We work lawfully.** To earn business the right way, we make sure to comply with all antitrust and competition laws. They can be complicated, so when in doubt, we ask questions about what's appropriate (and what isn't) to avoid even the appearance of something improper.

Our Business Partners **We are good
business partners**



We are good business partners



Our Promise

To successfully cooperate and collaborate with our business partners.

Our Process



Working with responsible, reliable business partners allows us to tap into goods, services and information we wouldn't have otherwise. That's why we foster good relationships by choosing our partners carefully and always interacting with integrity.



Our Process

❑ **We select wisely.** When we choose a vendor, supplier or other business partner, we exercise due diligence and only consider objective criteria such as their:

- ▶ Values
- ▶ Quality
- ▶ Cost
- ▶ Experience & Qualifications
- ▶ Reputation
- ▶ Availability

❑ **We work collaboratively.** We consider every business partner an extension of ourselves. That's why we monitor them closely – to ensure they're following the law and exhibiting our Values.

❑ **We set the standard.** We can't expect our business partners to take our Code seriously if we don't. That's why we review our Code; our policies and the law regularly and always treat business partners fairly. More specifically, we:

- Honor their policies as well as ours
- Watch for inappropriate gifts or other favors
- Protect their personal and confidential information

What are some examples of assets?

There are a few different types we should protect, including, for example:



▶ Checking business registrations



▶ Checking public documents



▶ Verifying trade accreditations



▶ Speaking to previous customers



▶ Asking for product samples



▶ Searching the internet



▶ Reading news articles

Think About it



Question

One of our contractors accidentally sent me confidential information. I find it interesting enough to share with a coworker over lunch. That should be fine since I'm just telling someone else at United Group, right?



Answer

No, that's not OK. Our contractors trust us with their information. If you receive something by accident, delete it immediately and let the sender know of their mistake. This will send the message that we always maintain confidentiality and that we expect them to do the same.



**Our Business Partners We cooperate
with government agencies and comply with
their requirements**



We cooperate with government agencies and comply with their requirements



Our Promise

To comply with all requests from the government.

Our Process



We honor our duty to always cooperate and provide honest information to governmental bodies and regulatory agencies. Whenever questioned as part of an audit or investigation, we respond appropriately and interact in ways that are open and transparent.



Our Process

- ❑ **We direct requests to the proper resource.** To ensure the most appropriate response, whenever we receive an inquiry from the government, we promptly contact our Legal Team for assistance.
- ❑ **We cooperate fully.** When we have been authorized to respond to a government request, we make sure to:
 - Always provide truthful, accurate and complete information.
 - Never impede, obstruct or improperly influence the audit or investigation.
 - Never lie or make false or misleading statements – verbally or in writing.
 - Never attempt to persuade someone else to provide false or misleading information.

Our Industry



Fighting crime and corruption



Following the rules when it comes to gifts and courtesies



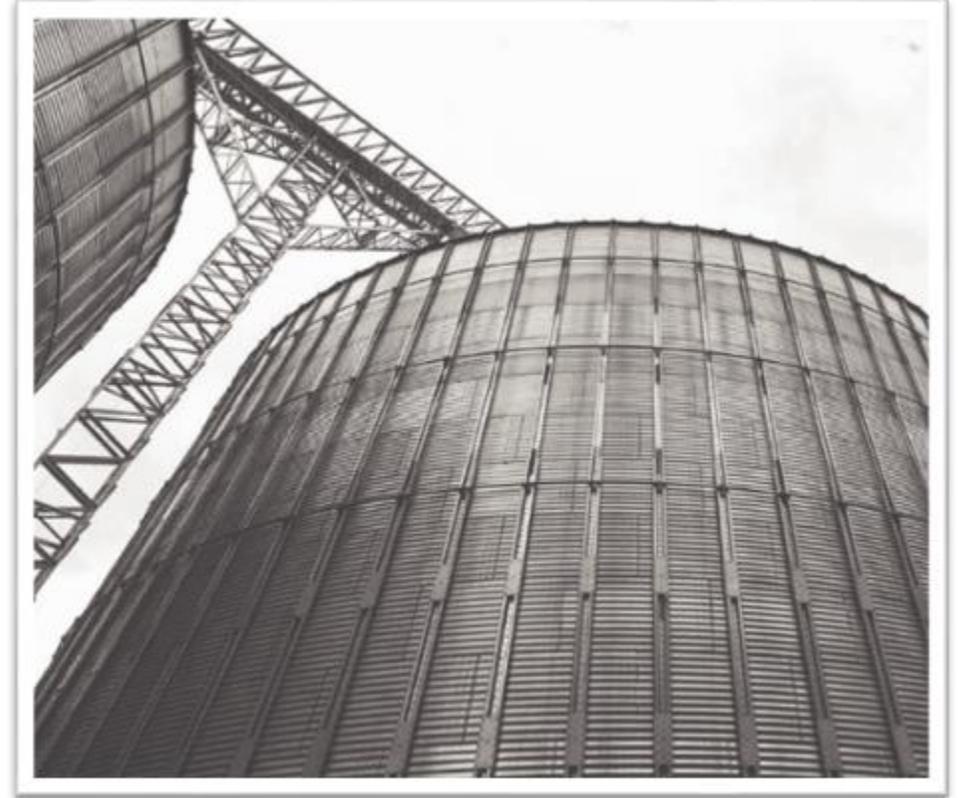
Following the laws, everywhere we operate



Playing fair when buying or selling stock

Our Industry

We hold each other, and ourselves, accountable. We do our part by conducting business with integrity.



**Our Industry We fight crime and
corruption**



We fight crime and corruption



Our Promise

We conduct business with a high degree of ethics and do not engage in suspicious or corruptive activity.



Our Process

We believe that the quality of our offerings and services, not illegal business practices, should bring us success. That's why we don't tolerate any acts of corruption, bribery or money laundering.



Our Process

- ❑ **We never bribe.** Although the laws on bribery and corruption can be complicated, doing the right thing is simple: We don't bribe. That means we never offer or accept anything of value to win business, gain an unfair advantage or influence a business decision.
- ❑ **We keep accurate records.** Of course, it's important to never bribe—but it's also important to avoid anything that even looks like a bribe. We make sure that our books and records accurately reflect our business so that we can easily explain the appropriate reason something was given and received.
- ❑ **We work with those who share our Values.** We understand that we can be held responsible for the things our business partners do. That's why we choose them carefully, then watch them closely.
- ❑ **We stay alert to money laundering.** Money laundering happens when funds are generated through criminal acts, like drug trafficking or terrorist activities, and then hidden (or "laundered") by being run through legitimate businesses. It's a way for criminals to disguise the profits of their criminal conduct. We stay alert for this activity and work to keep these funds from entering the Company.

What is “anything of value”?

It really can mean “anything.” Some examples include:



Cash or cash equivalents like gift cards



Special favors



Inappropriate gifts or entertainment



Discounts unavailable to the public



Charitable donations or political contributions



Payment of travel expenses

We fight crime and corruption

- ❑ **We watch our interactions with government and public officials.** We keep in mind that the rules about what we can give to government and public officials are strict. We don't send anything to or accept anything from a government official without speaking to the Legal Team or Governance Team first.
- ❑ **Government and public officials are more than just people elected or appointed to public office. They are also:**
 - Customs and tax officials
 - Regulatory agency officials
 - Military personnel
 - Employees of state-owned businesses

**Our Industry we follow the rules
when it comes to gifts a courtesies**



We follow the rules when it comes to gifts a courtesies



Our Promise

To foster healthy business relationships with the appropriate exchange of gifts
hospitality and courtesies



Our Process

An occasional gift or other courtesy can be a normal part of doing business, but
an offer that's lavish or extended too frequently can create a conflict of interest
and erode the trust that people associate with the United Group name.



Our Process

- ❑ **We must avoid** crossing any ethical lines. Any gift that creates, or appears to create, a sense of obligation or compromises your professional judgment is always inappropriate.
- ❑ **We give with caution.** Whenever we give or accept any gift, offer of hospitality or business courtesy, we make sure what's offered:
- ❑ **Is reasonable under** the circumstances – never excessive, extravagant or lavish. While not determinative in every situation, a **SAR 300** limit is a good guidepost in the absence of a specific approval by the Legal Team or Governance Team, whilst observing the following also:
 - Complies with local law, applicable business policies and customs
 - Is made on behalf of COMPANY/GROUP and not the individual
 - Is not cash or a cash equivalent (e.g., a gift card)
 - Is done openly and in a way that avoids even the appearance of anything improper

Our Process

- ❑ **We pay attention to travel.** Additional restrictions apply to expenses for travel, meals and lodging, so we're always sure to:
 - Pay vendors directly whenever possible.
 - Comply with all applicable laws and policies.
 - Only cover business-related expenses.
 - Avoid paying travel expenses along with a per diem.

- ❑ **We record accurately.** We document any exchange accurately and completely in our books and records.

Think About it



Question

A potential customer wants to meet at one of our buildings. We have agreed to cover the necessary travel and lodging. However, they would like to stay in the area for an extra night to do some sightseeing. Would it be OK to cover the additional associated costs?



Answer

No. We only pay for costs directly related to our business or the performance of a contract. The best thing would be to let the potential customer know we would be happy to provide travel to and from the meeting and reasonable accommodations for the duration of their business trip. Any additional accommodations would be inappropriate.



**Our Industry We follow the law,
everywhere we operate**



We follow the law, everywhere we operate



Our Promise

To respect the laws that apply to our business everywhere we operate.

Our Process



We recognize that our ability to reach customers beyond our local market is a privilege and not a right. To protect that privilege, we follow the law everywhere we work. Let's all do our part to stay on top of what's required so we can continue to be a world leader in our industry.



Our Process

We respect international regulations.

Conducting business around the world can get complicated, especially when we have multiple sets of regulations, customs and practices to comply with. Whenever a conflict between laws arise, we make sure to contact our Legal Team or Governance Team with questions.

We evaluate all business opportunities.

Certain countries we engage with may periodically be subject to trade embargoes or economic sanctions. Consequently, we carefully evaluate such opportunities in accordance with applicable regulations and restrictions. Additionally, we refrain from conducting business with any individuals or organizations that may pose significant risks to compliance or reputation.

**Our Industry We play fair when
buying or selling stock**



We play fair when buying or selling stock



Our Promise

To never use or share inside information to gain an unfair advantage.

Our Process



There may be times when we learn information about our Group, or the companies we work with, that isn't known to the public. If that non-public information is significant enough that it could affect the price of a stock (or other type of security) then it is considered inside information. We never use inside information to our advantage, and we never pass along inside information so that others may do so.



Our Process

- ❑ **We know how to identify inside information.** Inside information is both:
 - Material, meaning it could influence an investor to buy or sell stock
 - Non-public, meaning it hasn't been released to the public

- ❑ **We respect inside information.** When we have inside information, we don't buy or sell stock or other securities ("trade"), and we don't pass it along to others ("tip"). We only share it with coworkers and business partners on a need-to-know basis.

Our Process

- ❑ **We pay attention to blackout periods.** Depending on our jobs, some of us may at times be subject to additional trading restrictions—meaning we can't buy or sell Company stock regardless of what we know. It's important that we learn the rules before we trade.
- ❑ **We follow our fair disclosure obligations.** If we as a company do disclose material, nonpublic information, whether intentional or non-intentional, we always do it in accordance with legal requirements and we do so publicly. This way, we can be sure that the investing public as a whole has the same information.

Think About it



Question

I am part of the broader team that is in the process of helping United Group acquire one of our competitors by merger. The proposed merger has not yet been publicly announced. I know I can't share the inside information I have learned, but would it be OK if I just bought stock in the company at current stock market prices?



Answer

No, It's against Group policy to purchase or sell shares in the company that United Group seeks to acquire by merger while you have insider information. Even though you're not actually sharing the information, you would still be gaining an unfair advantage.



What are some examples of “inside information”?

It could be non-public information about:



Mergers or acquisitions



New products & services



Strategic business plans



Changes in leadership



Projected earnings or losses



Pending lawsuits



Our Community



Protecting human rights



Caring for the environment

Our Community

We strive to be an exemplary corporate citizen, to minimize our environmental impacts and to maximize beneficial outcomes for our communities and stakeholders.

**Our community We protect human
rights**



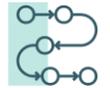
We protect human rights



Our Promise

To promote human rights, human dignity and fair employment practices

Our Process



We are fortunate to work with and for our people and communities, and we want to make a positive impact. That's why we respect individual human rights in all our business operations and at every level of our supply chain. And we only work with business partners who strive to do the same.



Our Process

- ❑ **We take care of each other.** Every member of our team invests valuable amounts of time and energy in our Company. So, it's only right that we make sure everyone is compensated fairly and protected. That's why United Group:
 - Follows all laws dealing with pay, benefits and working conditions.
 - Promotes the long-term health, safety and wellness of all employees.

- ❑ **We only work with the best.** We never knowingly do business with any company that violates human rights laws or engages in human rights abuses. As a result, we watch our business partners closely and do what we can to make sure they watch their business partners as well.

- ❑ **We say something.** As employees, we often see firsthand how our co-workers and business partners are treated. So, we stay alert and, if we ever see anything that breaks our commitment to human rights, we **Speak Up**.

**Our community We care for the
environment**



We care for the environment



Our Promise

To reduce our environmental impact and promote sustainable business practices.



Our Process

We're committed to being good stewards and limiting our environmental impact. We do this by pursuing sustainable practices in our business, through operating cleanly and efficiently and conserving natural resources. We also inspire others to do the same.



Our Process

- ❑ **We practice environmental stewardship.** We find ways to recycle, re-use and conserve materials like cardboard, plastic, glass, metal and whenever possible. We also follow all applicable environmental laws and regulations as well as our procedures for sustainability in procurement, proper disposal of waste and proper disposal, handling and storing of hazardous materials.
- ❑ **We save energy and water.** Sometimes it's the little things that make a big difference. That's why we always take time to:
 - Turn off electronics and lights when not in use.
 - Use energy-efficient alternatives whenever possible.
 - Turn faucets on a low flow, then turn them off when finished.
- ❑ **We stay alert.** We look out for and report any actual or potential environmental hazards right away.

Think About it



Question

I have some ideas for how to use less paper in our offices. We're not violating any laws, but I do think we could do better. Who should I talk to



Answer

We welcome any ideas for lessening our environmental impact. Explore your ideas with our HSE representative at United Groups to see if they can be implemented.



Our final thoughts

As leaders in the Saudi Arabia in importing, manufacturing and trading, we understand that our employees are the key to our success.

We depend on you. We depend on your talent, your passion and your dedication to our Values to set us apart. Help us stay true to our culture by working with impact and demonstrating our Values in all what you do.

Start with understanding and following our Code but know that the guidance and support we provide doesn't end there. We have policies with additional details as well as resources dedicated to addressing any remaining questions or concerns you may have.

We take pride in the work we do, but our singular focus will always be you. We owe you our best and we are here to invest in you as you do for us every day. Thank you for all that you do. Your commitment to our Values is how we stay Ahead of What's Next.

Help us protect our business, our assets and most importantly our reputation, if you know, or are suspicious about something, don't hesitate to *Speak Up* through the **SAWTAK** Helpline which is administered through a global compliance company NAVEX that guarantees anonymity and confidentiality.

SAWTAK Hotline

By using the SAWTAK Hotline, all communications will be anonymous unless You choose to provide identifying information.

There are several ways to access the **SAWTAK Hotline**:



▶ Dialing **800-XXX-XXX**



▶ Making A Web-based Report



▶ Scanning Our QR Code
And Filing Through The
Mobile App