



Dahra Business Code of Conduct

DAHRA ENGINEERING & SECURITY SERVICES LLC

Code of Conduct



Dear Colleague:

Business Conduct with Ethics is one of Dahra's core values. It is the foundation upon which we built this company and governs how we conduct business. Our commitment to integrity, accountability, respect and excellence has made us one of the top Omani Local companies in Defense, Security, and Aerospace.

Dahra is dedicated to providing an ethical, safe, productive workplace, free from discrimination and harassment. To achieve this goal, we have a shared responsibility to conduct ourselves ethically in our interactions with co-workers, customers, suppliers and competitors, as well as in the communities where we live and work. Dahra supervisors and managers have a special obligation to model ethical behavior and promote an environment that complies with our standards.

This Code of Ethics and Business Conduct provides principles and guidelines that apply to everyone at Dahra, regardless of position or level of responsibility, as well as those who act on our behalf. I urge you to read this document carefully and become thoroughly familiar with its contents.

Dahra is known for our dedicated people, outstanding performance and ethical business practices. Your continued commitment to value-based ethical behavior will ensure that we maintain our reputation as a company of integrity and a premier provider of services and solutions for our customers.

Thank you,

Khamis Al Ajmi
Chief Executive Officer



Dahra Business Code of Conduct

AIM

To establish a policy containing standards for appropriate business conduct for all Dahra employees.

Objective

The objective is to establish appropriate business conduct in all aspects of our day to day business activities. We are guided by our four Core Values:

- *Quality*
- *Integrity*
- *Service*
- *Innovation.*

The guide lines set hereafter are guidelines for all Dahra employees' for day to day business. Dahra is a focused company that believes in creativity and competitiveness as long as our efforts remain within the Omani business and commercial legal frame work, and within international laws and regulations. Every employee, officer of the Company must comply with this Policy. It is not possible to address in this Policy every possible situation that may arise in the conduct of our business. If you have any doubts or concerns or encounter a situation not covered in this Policy, ask the company CEO directly for guidance.

Our Values

Dahra is committed to doing the right thing and remembering who we work for. For this reason, we believe that it is important to comply with both the letter and the spirit of the laws and regulations that govern our business.

Setting the Standard-You are expected to perform all of your duties on behalf of Dahra in compliance with all laws, regulations and company policies and procedures. This is a minimum expectation.



Dahra Business Code of Conduct

Employee responsibilities

Each of us must take personal responsibility for acting according to our company values and this Code, even when this means making difficult choices. We must be committed to living our values and using our Code as a guide for interactions with our stakeholders, including fellow employees, customers, business partners, suppliers, third parties, government agencies, and communities. Accordingly, we have the responsibility to:

- Live our company values and abide by the Code, company policies, and the laws and regulations that pertain to an individual's particular job responsibilities.
- Report concerns about possible violations of the Code, company policy, or laws and regulations.
- Complete all required employee training in a timely manner and remain up-to-date on current standards and expectations.

It is important to note that violations of the Code, company policies, or country's Business laws and regulations may result in disciplinary action up to and including termination, or legal proceedings and penalties including, in some circumstances, civil or criminal prosecution for both the individual involved and Dahra.

Supervisor and manager responsibilities

Leaders, supervisors and managers have the following additional responsibilities:

- Lead by example and model the highest standards of ethical business conduct and our company values.
- Take the time to ensure your employees know how to use the Code and how to seek additional help.
- Help create a work environment that focuses on building relationships, recognizes effort, and values mutual respect and open communication.
- Be proactive. Look for opportunities to discuss and address ethics and challenging situations with others.
- Create an environment where everyone feels comfortable asking questions and reporting known or potential violations of the Code, policies, or the law.
- Strictly avoid acts of retaliation or behavior that may be perceived by others as retaliation, against those who report concerns.
- Respond in a timely and effective manner to concerns which are brought to your attention, but do not feel you must give an immediate response.



Dahra Business Code of Conduct

- Reflect, seek advice and respond later, if needed.
- Never ask or pressure anyone to do something that you would be prohibited from doing yourself.
- Hold employees accountable for completing all training requirements.

Build Trust and Credibility

The success of our business is dependent on the trust and confidence we earn from our employees, customers and shareholders. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honorable conduct. It is easy to say what we must do, but the proof is in our actions. Ultimately, we will be judged on what we do.

When considering any action, it is wise to ask to build trust and credibility for Dahra Will it help create a working environment in which Dahra can succeed over the long term? Is the commitment I am making one I can follow through with? The only way we will maximize trust and credibility is by answering “yes” to those questions and by working every day to build our trust and credibility.

Respect for the Individual

We all deserve to work in an environment where we are treated with dignity and respect. Dahra is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success. We cannot afford to let anyone’s talents go to waste.

Dahra is an equal employment/affirmative action employer and is committed to providing a workplace that is free of discrimination of all types from abusive, offensive or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to his or her manager or to human resources.

Create a Culture of Open and Honest Communication

At Dahra everyone should feel comfortable to speak his or her mind, particularly with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions. We all benefit tremendously when employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right time.



Dahra Business Code of Conduct

Dahra will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the company will take appropriate action. We will also not tolerate retaliation against employees who raise genuine ethics concerns in good faith.

Uphold the Law

Dahra's commitment to integrity begins with complying with laws, rules and regulations where we do business. Further, each of us must have an understanding of the company policies, laws, rules and regulations that apply to our specific roles. If we are unsure of whether a contemplated action is permitted by law or Dahra policy, we should seek the advice from the resource expert. We are responsible for preventing violations of law and for speaking up if we see possible violations.

Competition

We are dedicated to ethical, fair and vigorous competition. We will sell Dahra products and services based on their merit, superior quality, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities in connection with the purchase of goods or services for Dahra or the sales of its products or services, nor will we engage or assist in unlawful boycotts of particular customers.

Proprietary Information

It is important that we respect the property rights of others. We will not acquire or seek to acquire improper means of a competitor's trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property.

Selective Disclosure

We will not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any material nonpublic information with respect to Dahra, its securities, business operations, plans, financial condition, results of operations or any development plan. We should be particularly vigilant when making presentations or proposals to customers to ensure that our presentations do not contain material nonpublic information.



Dahra Business Code of Conduct

Health and Safety Policy

Dahra is dedicated in maintaining a healthy environment. We ensure to establish and maintain safe working conditions at all places of work by:

- Developing personal responsibility for safety
- Imparting appropriate training programs.
- Encouraging personnel to adopt the philosophy of safety as line management responsibility

Dahra firmly believes that all objectives are preventable and safety is to be held at equal importance as other business objectives. We fully comply with the local regulations of OMAN in implementing safety at site. The company shall conduct its operations in such a manner so as to cause any determinant to the environment through the control of waste disposal and implementation of the local environment law.

Dahra is committed to providing a safe, healthy, and secure workplace for colleagues and visitors to our facilities and to operating in an environmentally sound manner. DAHRA requires that all employees practice safe work habits and follow all applicable safety, security and health rules and practices.

RELATIONS WITH SUPPLIERS

Dahra employees are expected to be honest and fair in all business interactions with suppliers, which include contractors, consultants and other agents. Dahra's success depends on strong relationships with our suppliers, who help us provide high-quality products and services to our customers.

The choice of suppliers of goods and services must be made based on the best value received by Dahra. In addition, Dahra believes in doing business with those suppliers who demonstrate high standards of ethical behaviour. This is why we expect our suppliers to be aware of and abide by our Code of Conduct. Dahra will not knowingly use suppliers who operate in violation of applicable laws or regulations, including local environmental, employment and safety laws.

Conflicts of Interest

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may be faced with situations where the business actions we take on behalf of Dahra may conflict with



Dahra Business Code of Conduct

our own personal or family interests because of the course of action that is best for us personally may not also be the best course of action for Dahra. We owe a duty to Dahra to advance its legitimate interests when the opportunity to do so arises. We must never use Dahra property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with Dahra

Accountability

Each of us is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about company policy. If we are concerned whether the standards are being met or are aware of violations of the Code, we must contact the HR department. Dahra takes seriously the standards set forth in the Code, and violations are cause for disciplinary action up to and including termination of employment.

Be Loyal

Confidential and Proprietary Information

Integral to Dahra's business success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, customers and other business partners. Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses or nonpublic information about other companies, including current or potential supplier and vendors. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

Quality assurance

We are an ISO 9001:2008 accredited company. Every six months we have an Internal Audits and also External Audits conducted yearly.

We maintain the quality of what we do through constant ongoing review with our clients, of all aims, activities, outcomes and the cost-effectiveness of every activity. We encourage regular review meetings and provide regular progress reports. This company has been accredited under a number of quality assurance schemes.

Use of Company Resources

Company resources, including time, material, equipment and information, are provided for company business use. Nonetheless, occasional personal use is permissible as long as it does not affect job performance or cause a disruption to the workplace. Employees and those who represent Dahra are trusted to behave responsibly and use good judgment to conserve



Dahra Business Code of Conduct

company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, we will not use company equipment such as computers, copiers and fax machines in the conduct of an outside business or in support of any religious, political or other outside daily activity, except for company-requested support to nonprofit organizations. We will not solicit contributions nor distribute non-work related materials during work hours.

In order to protect the interests of the DAHRA network and our fellow employees, DAHRA reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device, the use of the Internet or DAHRA intranet. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate.

STANDARDS OF CONDUCT AND BUSINESS ETHICS

The Internationally recognized Dahra has been holding TRACE certificate and membership for anti-bribery compliance since 2008.

Compliance with Law and Government Regulations

The Company and its employees, officers must adhere to the highest ethical standards in every area of our business and in all of our daily activities and comply with all laws and regulations that apply to the conduct of the Company's business national and worldwide.

Anti-bribery Laws

We will not offer, promise, authorize or give a bribe in order to gain a competitive advantage, influence the recipient's conduct, reward improper conduct, or cause another not to act in good faith, impartially or in accordance with a position of trust. We will not request, agree to receive, or accept a bribe. Business courtesies provided to others must be in conformance with all applicable laws and Dahra policy. The following rules must adhere to by all:



Dahra Business Code of Conduct

A BRIBE is the payment of anything of value - such as cash, gifts, services, contributions, internships or vacations – made for the purpose of improperly obtaining or retaining business.

A kickback is the return of a sum already paid or due to be paid as a part of a legal contract, as a reward for making or fostering business arrangements.

FACILITATION OR EXPEDITING PAYMENTS *Sometimes known as “grease payments,” facilitation or expediting payments are modest amounts of money paid as an unofficial fee to low level government employees to speed or initiate the performance of routine and expected government services to which Dahra is entitled.*

- Dahra Employees understands and acknowledge that they will not offer, nor tolerate or authorize bribery, or any other corrupt activities, in connection with conduct of business and subject to the Oman commercial Law.
- Dahra Employees will not whether directly or indirectly, offer, promised or given a financial or other advantages (including without limitation any money, contribution, gifts, bribe, rebate, payoff, influence payment, kickback, advantages or anything of value including any benefits of any kind) and shall not, whether directly or indirectly authorize, offer, promise or give such financial or other advantage:
 - To another person with the intention to include a person to perform improperly a relevant function or activity (including any function of a public nature, any activity connected with business, any activity performed in the course of a person’s employment or any activity performed by or on behalf of a body of persons (whether corporate or unincorporated));
 - to another person with the intention to reward a person for the improper performance of such a function or activity;
 - to another person with the knowledge or belief that the acceptance of the advantage would itself constitute the improper performance of such a function or activity;
 - to a government official (or his representative) any political party or party official, any candidate for political office, with the intention of influencing such official, party or candidate in its or his official capacity to do or omit an act in violation of the lawful duty of such party, official, or candidate and with the intention of obtaining or retaining business, or to secure any improper advantage;
- to another person , while knowing or being aware of the high probability that all or a portion of such money or



Dahra Business Code of Conduct

MONEY LAUNDERING occurs when companies or individuals attempt to convert, disguise or hide proceeds of illegal activity by moving illegally obtained funds, or hiding the source so the funds are made to appear legitimate.

- thing of value will be offered, given, or promised, directly or indirectly, as a bribe or kickback;
- To a foreign public official or any person for the benefit of a foreign public official (a) as consideration for an act or omission by the official in connection with performance of the official's duties or functions; or (b) to include the official to use his or her position to influence any acts or decisions of the foreign state of public international organization for which the official performs duties or functions.

Dealings with Governments and Other Public Bodies and Their Employees

Illegal Payments

We do not provide any financial or other advantage or anything else of value, directly or indirectly (for example, through a third party), as a bribe or kickback, or for any illegal purpose, to or for the benefit of any government official, representative or employee, any government entity of any other country or any Oman or foreign government-owned company. The term government official should be interpreted broadly, to include any government employee or representative, as well as candidates for political office, political parties and party officials, and employees of public international organizations.

CONFIDENTIAL INFORMATION

Non-public, confidential and proprietary company information is a valuable asset that relates to present or planned business, including its suppliers, vendors, competitors, and customers ("Confidential Information"). "Trade secrets" and "know-how" are types of Confidential Information, but the general category is broader. Confidential Information includes, but is not limited to:

- Computer software, systems, databases, documentation and all data therein;
- Financial data (including investments, profits, pricing, costs, and accounting);
- Procurement plans, vendor lists or purchase prices;
- Technical information relating to processes and techniques;
- Marketing, advertising and sales programs and strategies;
- Information relating to acquisition or divestiture activity;



Dahra Business Code of Conduct

- Personnel information (including compensation, recruiting and training);
- Strategic business plans;
- Customer and supplier lists;
- Systems, programs, or procedures; and
- Non-public information that might be of use to competitors, or harmful to Dahra or its Partners and/or customers, if disclosed.

Officers and employees must maintain and protect the confidentiality of all Confidential Information, whether obtained from or relating to Dahra and/or its suppliers, vendors, customers or other third parties having a confidentiality agreement with Dahra, except when disclosure is authorized by the Chief Executive Officer. Employees should not disclose or use any Confidential Information for any purpose other than on a “need to know” basis within the Company. Similarly, employees should not attempt to obtain or learn Confidential Information that they do not need to know to perform their own employment duties. This obligation lasts during the entire term of one’s employment with Dahra and at all times thereafter.

If an Employee believes it is appropriate for business reasons, or required by law or regulation, to disclose or use Confidential Information outside the Company, the CEO must be contacted before the disclosure or use to discuss the proper protective measures.

All companies regard their confidential information as extremely valuable. Employees should not attempt to obtain confidential information from any third parties – suppliers, vendors, customers or competitors – without contacting the office of the CEO in advance.