

Alhamadah Almutahida

Commercial Registration No. 412256



Code of Business Conduct and Ethics

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Revision: 1.0

Process Owner: Chief Executive Officer

Intended Users: Alhamadah Almutahida. All employees and business associates.

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CONTENTS

1. PURPOSE
2. SCOPE
3. COMMITMENTS
4. IMPLEMENTATION
5. RESPONSIBILITIES AND REPORTING
6. EFFECTIVE DATE

1. PURPOSE

- 1.1. This code sets out how we expect everyone working for Alhamadah Almutahida to behave, and what a client, a supplier or an employee is entitled to expect from us in return.

2. SCOPE

- 2.1. This policy applies to every director and employee of Alhamadah Almutahida, and to our business associates, including agents, suppliers, subcontractors, hauliers and any other party performing services for or on behalf of the company.
- 2.2. It applies at our yard, at our office, and at any client site our people or our vehicles enter. Where a client operates a stricter standard, the client's standard applies.

3. COMMITMENTS

- 3.1. A scrap transaction rests on trust in a description and a number. We protect that rather than exploit it.
- 3.2. We give effect to these commitments through the following, which include but are not limited to:
- a) **Honest Description**
We describe material as it is. Grade, weight and condition are stated accurately, including when doing so is not to our advantage.
 - b) **Honouring Agreements**
The price quoted is the price settled, unless the material itself turns out to differ from what was described, in which case it is re-quoted openly rather than adjusted quietly.
 - c) **Confidentiality**
Client information, including volumes, prices and site details, is treated as confidential and is not passed to another party.
 - d) **Conflicts of Interest**
Conflicts of interest are declared rather than managed quietly. Anyone with a personal interest in a transaction says so before it proceeds.
 - e) **Trade Compliance**
We observe the export controls, sanctions and trade restrictions that apply to the material and to its destination.
 - f) **Company Property**
Material, equipment and funds belonging to the company or to a client are not taken, used privately or disposed of for personal gain.
 - g) **Business Associates**
We expect the same standard of our suppliers and subcontractors, and we will stop working with those who do not meet it.

4. IMPLEMENTATION

- 4.1. This code is given to every employee when they join, and forms part of the terms on which they are engaged.

- 4.2.** A breach is grounds for disciplinary action up to and including dismissal, and where the law has been broken, for referral to the authorities.

5. RESPONSIBILITIES AND REPORTING

- 5.1.** Responsibility for observing this policy rests with every person it covers. Oversight rests with the Chief Executive Officer, and day to day implementation with management.
- 5.2.** Anyone, whether employed by the company or not, may report a breach. A person who reports in good faith is given confidentiality and is protected from any adverse consequence for having reported.
- 5.3.** Reports may be made to the Chief Executive Officer directly, using the telephone number printed at the foot of this document.

6. EFFECTIVE DATE

- 6.1.** This policy was approved by the Chief Executive Officer and is effective from the date shown below. It is reviewed at least once a year, and whenever the work, the law or a client requirement changes.

Effective from **31 August 2026**

Mohammed Sajid

Chief Executive Officer
Alhamadah Almutahida

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