

مدونة قواعد السلوك

Code of ETHICS



بيت الاستثمار
Investment House

Code of Conduct

Dear Employees of Investment House Company,
Greetings,

At Investment House Company, we take great pride in the solid reputation we have built as a trustworthy business partner for our clients and business managers abroad. This esteemed reputation has been earned through our unwavering commitment to honesty and integrity in all our endeavors.

The diligent pursuit of establishing our company's reputation as a trusted entity is not coincidental nor easily achieved. It demands substantial effort, dedication, and individual responsibility from every member across all levels of the organization.

The implementation of our Code of Conduct at Investment House Company is designed to assist us in fulfilling our responsibility towards conducting business in the right manner, adhering to laws and ethical best practices.

Each one of us, whether an employee, an official, or a manager, must not only understand this code, its values but also actively comply with it. While it is impossible for any policy document to cover every challenging situation that may arise, it is essential to be familiar with the available resources should you have questions or concerns. Moreover, it is also crucial to always seek guidance if you witness anything that seems to violate this code, and your concerns will be taken seriously.

We urge you to thoroughly review and contemplate this Code of Conduct, ensuring that your actions align with our commitment to conducting business in the right manner. Let us take pride in the noble behaviors that constitute a fundamental pillar of our business culture.

Thank you,
Sincerely,

Jihed Mehdoui
Chief Executive Officer
(CEO)

Code of conduct



Dear Colleagues and Workplace

We treat our colleagues at work with utmost respect and dignity, as they rightfully deserve. We collaborate as a team to solve problems and accomplish tasks correctly. We acknowledge the unique contributions of each individual and strive together to provide a safe and comfortable working environment where all employees of Investment House Company can thrive.

Our commitment to ethics and compliance

Both our clients and suppliers deserve our commitment to conducting business in the right manner. They consistently expect us to deliver on our promises, maintain our reputation in all our endeavors, demonstrate professionalism, adhere to ethics, be conscious of laws, regulations, and other obligations that govern our operations, and trust that we act rightly.

Our responsibilities towards the company and its stakeholders

Investment House Company and its stakeholders rely on our loyalty and transparency. Without these, informed decisions cannot be made, and their trust in us cannot be assured. It is imperative that we maintain accuracy in our records, the integrity of our practices, protect our resources, and prioritize the company's best interests.

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1. Our Code of Conduct



Code of Conduct – Investment House

Purpose of the Code at Investment House Company:

Our Commitment to Doing What's Right

- We commit to demonstrating our dedication to our clients, business partners, investors, stakeholders, and communities by conducting ourselves with honesty and integrity in all our actions.
- To reaffirm our commitment to this principle, we adhere to the guidelines outlined in this Code.
- This Code serves as a guiding booklet, offering practical advice to help us make informed ethical decisions.
- It stands as one of the crucial tools from which we benefit to fulfill our obligations towards stakeholders and to reinforce our dedication to ethical conduct towards our clients and business partners, both locally and globally.
- Through this Code, you will become acquainted with further guidance and instructions available to assist you in being informed and raising awareness and understanding.
- As you go through this document, consider how your actions contribute to meeting the expectations towards Investment House Company, our clients, and related parties.
- Should you have any queries on how to meet these expectations, feel free to reach out to colleagues within the company for assistance.
- Investment House Company commits to upholding the highest standards of ethical and professional conduct.
- The code of ethics outlines the minimum expected behavior from all employees, managers, and senior management.
- This code is based on relevant policies and procedures that you are expected to read and understand, in addition to understanding the necessity of complying with HR policies regarding employment rights and duties.
- Compliance with local laws and regulations takes precedence when they are stricter than those mentioned in this guide.
- For any inquiries regarding the code of ethics, please consult your direct manager or the company's compliance officer.

Our Values

Each employee is expected to perform their daily work for the company in a manner that reflects our core values, which are:

Customer Priority

- We commit to understanding our customers and fostering long-term relationships with them by ensuring the highest levels of service delivery through:
- Focusing on building relationships with customers from all levels and segments of society.

Code of Conduct – Investment House

- Responding promptly to customers, considering the role of speed in problem-solving and complaint resolution.
- Maintaining continuous and open dialogue to understand customer needs and investment preferences.
- Identifying and providing specially designed services to meet diverse customer needs.

Teamwork

- We work together as one team to provide an outstanding experience for our customers by:
- Strengthening the unity and cohesion of the team within the company.
- Prioritizing customer needs over individual performance-related goals.
- Innovating new ways to perform tasks and making operations more transparent and streamlined.
- Fulfilling all promises made to our customers and colleagues.

Adhering to the Code

All employees at Investment House Company, across all job levels and managerial positions, including company officials and board members (referred to collectively as "employees"), are required to comply with this Code. This means that everyone, irrespective of their title or position, is obligated to adhere to the directives and guidelines outlined in the Code.

Given that we conduct business in diverse locations worldwide, local laws or customs may occasionally conflict with this Code. Therefore, it is essential to follow the most stringent and rigorous standards, ensuring that the Code's directives and guidelines are not violated.

While this Code covers several workplace scenarios, it may not encompass every possible situation that may arise in the workplace. Similarly, it may not enumerate all our policies and procedures. Therefore, it should be used as a guide for our ethical standards, with responsible authorities available to receive your questions or concerns.

Setting a Good Example

All employees at Investment House Company are expected to conduct themselves transparently, make purposeful and ethical decisions, and collaborate to solve problems. However, if you hold an executive, managerial, or responsible position within the company, additional responsibilities beyond those mentioned above apply. As a leader within the company, you must:

- Serve as a good example, even if you believe you are not under close scrutiny and have significant authority.
- Commit to fostering a culture that promotes ethics, quality, health, safety, security, and environmental preservation.
- Accept personal invitations for training on key topics in this Code and ensure that other employees do the same. Additionally, conduct meetings with employees to address their queries and concerns.

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- Engage in regular discussions with your work teams to identify compliance risks, address and mitigate them.
- Encourage other employees to ask questions and express concerns, handling their reports and inquiries appropriately.
- Take steps to eliminate reported risks, ensure medical care for reported injuries, investigate reported incidents, and mitigate them.
- Remember that decisions made by subordinates reflect the leadership of their superiors; hence, assist them in doing what is right.

Reporting Concerns and Seeking Advice

Do not hesitate to seek guidance or report concerns when you perceive something is going wrong or violating this Code. We assist the company in maintaining its ingrained integrity culture through disclosure when we have questions or witness potentially unethical or illegal behavior.

We are committed to integrity, honesty, and transparency in all our actions.

Sometimes, you may realize that some of your colleagues engage in inappropriate activities that violate our standards, values, and adopted policies.

We strongly encourage you to report any criminal or unethical behavior or any suspicious behavior. All reports are handled confidentially, consistently, fairly, and promptly. When reported in good faith, we will protect you from any potential threat, harm, injury, or loss of work.

You can report suspicions or concerns via the hotline or email:

Hotline: +974 44 200 300

Email: Compliance-AML@invhouse.com

If you do not receive a satisfactory response, you can report your concerns to the company's auditing officer.

If you have any questions or wish to report a potential violation of this code, the company's policies, or the law, you can contact any of the following resources:

- **Your supervisor, manager, or any other trusted manager.**
- **Someone you trust in the Human Resources department.**
- **Legal counsel or a legal advisor.**
- **The internal audit department.**
- **The company's email.**
- **The Compliance Hotline for Investment House anonymously.**

2. Colleagues & Workplace



Code of Conduct – Investment House

Employees' Responsibilities:

We rely on your personal integrity to safeguard the company's interests and reputation.

Your responsibilities regarding the Code of Ethics include:

Understanding and complying with the code.

Acting fairly, honestly, and ethically in all company matters.

Avoiding conflicts of interest.

Compliance with all laws and regulations.

Adherence to our policies and procedures.

Operating within the scope of delegated authority.

Cooperating during any company-related investigations, inquiries, or legal summonses.

Commitment to training related to the code of ethics when necessary.

Reporting any legal or legislative actions involving the employee personally.

Reporting any behavior conflicting with the company's values and professional ethics.

The managers bear greater responsibility, including the following:

- Setting an example for the employees.
- Promoting equality and avoiding favoritism or marginalization of any colleague.
- Assisting employees with any ethical questions or guiding them to someone who can help.
- Encouraging employees to report any unacceptable or suspicious behavior.
- Protecting employees who report suspicious or unacceptable behavior from any adverse reactions resulting from their goodwill.

Since we promote a culture of personal integrity and transparency, it is your responsibility to inform your immediate manager or discuss with them about any incidents or risks, whether they are inevitable or possible. The manager will, in turn, escalate the information to the higher management according to the escalation policy if necessary.

Professionalism and Respect

Professionalism and mutual respect are indispensable in creating a productive workplace that allows us to maintain our enthusiasm and passion. The company strives to foster an inclusive and respectful environment by making relevant employment decisions based solely on qualifications and merit.

Code of Conduct – Investment House

Discrimination and Harassment are Strictly Prohibited

Harassment can take various forms and may appear different in shape and content depending on individuals. In general terms, harassment is defined as any action that creates a threatening, humiliating, or hostile work environment for any employee.

Harassment can be verbal, visual, or even physical. It may involve verbal bullying, false accusations, comments, or humiliating images. Regardless of the form it takes, harassment is both unethical and illegal.

As an integral part of our culture of respect, the company strongly prohibits any discrimination or harassment based on:

- Gender
- Age
- Ethnicity
- Color
- Religion
- Mental or physical disability
- Lineage
- Any other protected status under the law.

Drug and Alcohol Use

Working under the influence of drugs or alcohol can impair our performance at work. These substances can lead to errors and put the health and safety of those around you at risk. Therefore, it is strictly prohibited to engage in work while under the influence of alcohol, illegal drugs, or controlled substances used for non-medical purposes, under any circumstances.

Furthermore, distributing illegal or controlled substances, possessing, using, or selling them within the company premises or during working hours is strictly prohibited.

Compliance with the Code of Ethics

Upon hiring and annually thereafter, you are required to acknowledge in writing or electronically that you have read and understood your responsibilities and obligations outlined in the Code of Ethics at work and related policies and procedures, and agree to comply with them.

Code of Conduct – Investment House

In the event of a breach of any provisions of the Code or any related policies, you are immediately required to consult with your immediate supervisor and the Regulatory Compliance Department, who will address and rectify the matter.

In case of any deliberate misconduct or intentional failure to report any breach, it may result in consequences for you or the company, which could include disciplinary actions such as termination of employment or even legal proceedings in some cases.

Making Ethical Decisions

Our Code of Ethics and company policies and procedures may not cover every possible situation an employee might encounter. Therefore, you may use the following questions to assist in making any decisions:

Is this action legal or in line with the spirit of the law?

Does it align with the Code of Ethics at work?

Is the decision based on sufficient information?

Is it necessary to consult others?

Who are the parties or individuals that might be affected by this decision?

Could this decision negatively impact me or the company?

Our Employees

We recognize that our employees are the most critical component of our company and the key to its success and achievement of its goals. Hence, we focus on providing a safe environment based on fair and respectful treatment.

Ability to Work

It is the responsibility of the employee to ensure physical and mental fitness to perform their duties when coming to work.

The use of alcohol, drugs, or any illegal substances within the company premises or during official working hours is prohibited.

Displaying signs of intoxication or using drugs or any illegal substances by employees will lead to disciplinary actions, including termination of employment.

Compliance with Employment and Labor Laws

Our employees are our most important asset. Therefore, all recruitment activities must comply with all applicable laws and regulations, including those related to working hours, wages, equal opportunities, human rights, and working conditions.

Code of Conduct – Investment House

Generally, we should always:

Work safely and ensure the safety of others.

Report all risks and incidents to the immediate manager.

Participate in training sessions and emergency drills.

Attend safety training sessions and apply the knowledge and skills acquired in daily tasks.

Equal Opportunities

We affirm the principle of equal opportunities for all job applicants in the company, as well as for employees. We do not discriminate based on race, religion, color, nationality, ethnic origin, citizenship, gender, marital status, disability, or any other basis.

Performance Management

The company works to develop, support, and instill a culture of good and excellent performance. Professional objectives are identified and reviewed in an environment that values performance exceeding expectations and supports employee development.

Discrimination, harassment, violence, or intimidation of any kind will not be tolerated.

It is the responsibility of every employee to report any behavior that violates this policy, and we take all reports seriously.

Maintaining Safety

At the workplace of Investment House Company, nothing is more important than the health and safety of our employees, our environment, and our communities. Therefore, we adhere to all health and safety laws, regulations, and company policies to maintain safety and security in the workplace.

Safe Working Environment

It is your responsibility to ensure your safety and the safety of others by:

Complying with policies related to fire outbreaks, health, and safety.

Understanding the risks in the daily work environment and taking all reasonable precautions to prevent work-related accidents and injuries.

Immediately reporting any unsafe work conditions, whether serious incidents or imminent accidents, to the immediate manager.

Knowing what to do in emergency situations.

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Participating in company-provided health and safety training.

Participating in building evacuation drills, especially as the company operates in a high-rise building that necessitates evacuation training in emergencies.

Our Customers and the Market

Fair Treatment of Customers:

Treating customers fairly, ethically, and without discrimination throughout our relationship with them is an integral part of our work culture. This helps build constructive and positive relationships with our customers.

Always take care to:

- Ensure communications with customers are clear, fair, and not misleading.
- Sell approved and authorized products and services that meet the customer's needs.
- Handle customer complaints sensitively, professionally, and efficiently.
- Avoid exploiting our customers through manipulation or concealment.
- Misuse of confidential information.
- Distorting material facts and any other unfair practices.

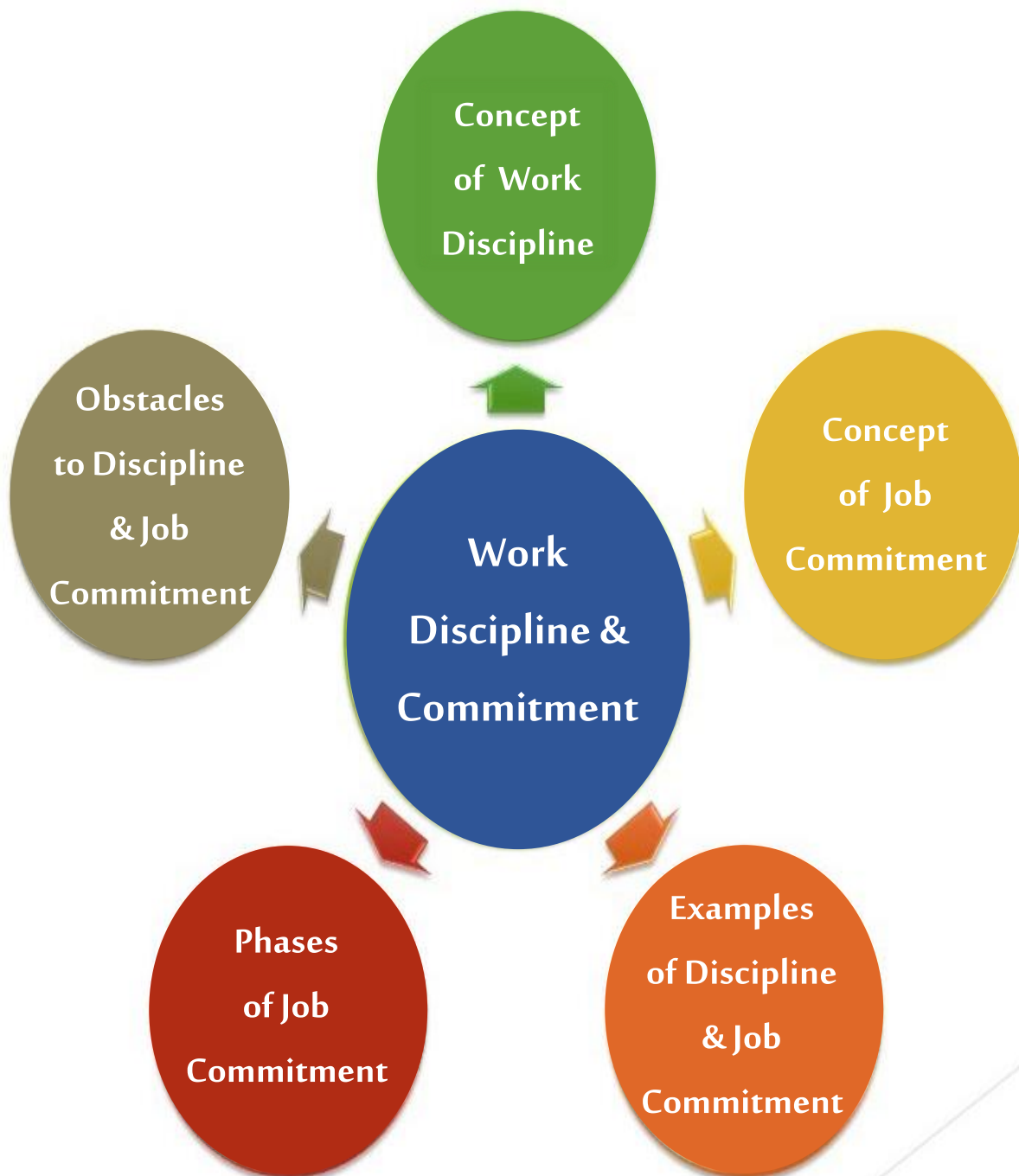
Confidentiality

Complete confidentiality must be maintained regarding all information obtained during work unless the owner of this information has provided written consent to the contrary.

Disclosure of information related to the company, customers, or other parties is prohibited unless authorized or required by law. This commitment applies even after leaving employment with the company.

Information obtained during employment at the company should only be used to perform your duties in the company. It is not permissible to use information from institutions or companies where you previously worked.

3. Commitment to Ethics & Compliance



Code of Conduct – Investment House

Financial Crimes

We are committed to upholding the highest ethical and professional standards and strive to prevent the use of the company as a tool for committing financial crimes, whether intentionally or unintentionally.

We comply with all laws, legislations, international standards, regulations, and guidelines related to combating financial crimes issued by Qatar Central Bank and local regulatory authorities in the State of Qatar.

We also adhere to the recommendations of the Financial Action Task Force (FATF).

Financial crimes include:

Money laundering, financing terrorist organizations, and proliferation financing of weapons of mass destruction. Sanctions violations.

Fraud.

Bribery and corruption.

Forgery.

Conducting Business Free from Corruption and Bribery Practices

When we work with our clients and business partners, we must do so with honesty, respect, and objectivity. We never seek to gain an unfair or improper advantage through dishonest, deceptive, or corrupt practices, such as bribery, kickbacks, or other improper payments, nor do we allow others to do so on behalf of the company.

Bribery can take many forms, including money, gifts, favors, or lavish entertainment offers. In short, bribery is any offer, promise, or permission to provide anything of value with the intent to improperly influence the actions or decisions of a client, business partner, or government official to obtain, retain, or gain an advantage, regardless of its nature, in an improper manner.



Code of Conduct – Investment House

Dealing with External Parties

The company may be at risk of violating anti-corruption laws due to actions taken by external parties acting on behalf of the company. This applies whether we are aware or unaware, and whether we permit or do not permit any improper payments made by these individuals. For this reason, we must take all reasonable precautions to ensure that external parties acting on our behalf are aware of our code of conduct, policies, and the law and adhere to them.

Before allowing representatives of external parties to act on our behalf, we must ensure our adherence to the specified procedures in the anti-corruption policy.

If you have any questions regarding dealings with external parties or notice any signs of risk in your interactions with company representatives, please contact the appropriate management for guidance.

Indirect Payments

Indirect payments refer to cash bribes, travel, accommodation, gifts, entertainment favors, or payments for something at an exorbitant price made through an external party. We cannot use someone to do what we can do ourselves, so we must ensure that all external parties acting on our behalf meet our ethical standards and behave properly at all times.

Ignoring signs that suggest the possibility of an external party making improper payments or avoiding taking action to detect such payments is a violation of anti-corruption laws. Therefore, exercise caution when making any payments and consult the compliance management or the appropriate management if you have any questions.

Supplier Relationships

Ensuring that all suppliers and service providers contracted are treated fairly and selected based on the price and quality of service should be prioritized, and there should be no preferential or personal treatment.

Policies and procedures related to procurement and hiring external sources for services from suppliers must be followed.

Expenses (Costs)

Expense reports must be accurately prepared and submitted in a timely manner. All expenses must be business-related and approved according to the expense policies. Furthermore, the official employee credit card must not be used for any business-related expense purposes.

Exchange of Gifts, Meals, and Entertainment Courtesies in Business

The way we engage with others shapes our business conduct, and maintaining positive relationships is essential for business continuity. Regarding fostering business relationships with our clients and suppliers, it may be appropriate to offer or receive certain business courtesies. A common part of business involves offering reasonable-cost meals and entertainment courtesies, as well as exchanging symbolic gifts with others. However, it is imperative that these gifts and courtesies are never offered with the intention of inducing the recipient to misuse their position.

As the value of the gift or entertainment courtesy increases or the frequency of such gestures rises, it becomes more likely to pose a conflict of interest or sometimes be perceived as a bribe. To ensure appropriateness, entertainment courtesies must align with prevailing business practices and never be overly lavish or inherently valuable. They should be offered in the regular course of business, occur in an appropriate setting, and not be based on a client's or supplier's request.

There are specific limits and guiding principles regarding gifts and entertainment courtesies, including considerations and policies related to dealing with government officials in anti-corruption policies, international travel policy, and entertainment. If you have any questions about the suitability of a specific business courtesy, speak to your manager or the appropriate management.

Finally, before accepting any gift or entertainment courtesy that you are not allowed to provide under the company's policy, you must first seek approval from your manager. If you are offered or receive a gift or entertainment courtesy that could influence your business decisions or be perceived as having an impact, seek legal advice.



Code of Conduct – Investment House

Employee Responsibilities Regarding Financial Crimes and all employees should:

- Exercise extreme caution and meticulously carry out work procedures within your job scope to prevent the company from being exposed to financial crimes.
- Understand and comply with the company's policies and procedures regarding money laundering, terrorist financing, fraud, financial crimes, and all related laws and legislation.
- Know how to recognize critical indicators that suggest a customer may be attempting to engage in transactions for illegal purposes or using proceeds from unlawful activities.
- Ensure the necessary investigations are conducted regarding both new and existing clients in accordance with company policies and guidelines.
- Attend any training related to combating money laundering, terrorist financing, fraud, and financial crimes as required by job specifications and the required proficiency levels.
- Understand, follow, and comply with the legally mandated penalties and the company's policy in this regard.
- Report any suspicious activity to the company's Money Laundering Reporting Officer (MLRO).

Prevention of Money Laundering

Our commitment to doing what is right requires us to be cautious about potential money laundering activities. Money laundering is the process through which an individual or entity attempts to conceal illegally acquired funds or give these funds a legitimate appearance. We can identify potential money laundering schemes through specific warning signs, such as:

- Unusual payments, including cash transactions or transactions that seem suspicious.
- Unusual secrecy regarding transactions or client identities or account owners.
- Payments deposited into personal accounts instead of business accounts.
- Unusual money transfers to or from unrelated countries or entities.



If you detect any of these warning signs, you must report the situation to the relevant management immediately.

Code of Conduct – Investment House

Charities and Non-Profit Organizations

When dealing with charities or non-profit organizations, consider the following:

Ensure that it does not conflict with the instructions and policies of regulatory authorities (Qatar Central Bank's instructions, taking into account Circular No. (2)/2022 issued in June 2022 regarding instructions for dealing with non-profit organizations).

Do not encourage customers, suppliers, or other employees to contribute to or participate in such activities.

Sometimes, customers or suppliers may request the company to contribute to a charity or non-profit organization. In such cases, all contributions must be approved by the compliance officer after ensuring compliance with the rules and laws governing these activities.

Dealing with Competitors and Fair Competition

Any information about the market or our competitors must be obtained through legal and ethical channels.

Employees should not incite our competitors' staff to obtain information belonging to competitors.

External Communication

Issuing statements on behalf of the company is only allowed for authorized company representatives, and the media policy should be reviewed for further guidance and information.

We excel in business through our employees' professionalism and the quality of our work, avoiding deception or illegal practices. We always adhere to antitrust laws and competition laws, whether dealing with our customers, business partners, or even competitors. We always conduct ourselves with integrity, ethics, and honesty. We avoid making false or misleading claims about our business or competitors.

Global antitrust laws and other competition laws prohibit us from entering into agreements with our competitors that limit competition, such as illegal price fixing, allocation, or targeting the same markets and businesses, or engaging in behavior aimed at monopolization or maintaining a monopoly.

If a competitor or business partner attempts to discuss these issues or any other anti-competitive matters, make it clear that you will not engage in such discussions. Then promptly report this dialogue to the relevant management. Be especially careful not to share sensitive trade information with competitors when attending industry conferences or trade shows. If you find yourself engaged in a conversation that could lead to sharing trade information, it is best to excuse yourself or terminate the conversation immediately.

<u>Anti-Trust and Prohibited Dialogues</u>

Code of Conduct – Investment House

Certain competitive topics tend to form unsound agreements or appear as such. Even regular dialogues can be seen by others as an agreement or a partnership offer. Therefore, the following topics should never be discussed with the company's competitors:

- The prices offered to our customers.
- Market division or customer allocation.
- Boycotting specific suppliers or customers.
- Manipulation in competitive bidding, tenders, or deals.
- Hiring plans or strategies, or employee wage levels.

Compliance with Commercial Laws and Sanctions

As an investment firm with clients and external investment operations subject to laws governing international trade, we collectively bear the responsibility to remain aware and comprehend all applied commercial laws and regulations. Non-compliance with international trade laws and regulations could lead to business losses and expose our company and employees to criminal charges.

International trade laws and their regulations subject some countries and individuals to penalties or economic embargo processes. These regulations can limit our transactions with certain countries, individuals, or associated entities or even entirely prohibit them. It is crucial always to seek legal advice before engaging with a country or individual if there is a possibility that working with them might invoke sanctions laws or regulations. Sanctions laws and regulations change continuously, so you must ensure that you are up-to-date with the latest developments and seek legal guidance if you have any doubts or questions.



4. Our Responsibilities towards the Company & its Stakeholders



Code of Conduct – Investment House

Record Keeping

The integrity of a company's business records is crucial for investors, stakeholders, and the company as a whole. It is imperative that these records are always complete and accurate. This aids in precisely assessing the company's performance, devising informed and sound plans for its future, and ensuring compliance with legal requirements by providing a clear picture of our operations to our investors through the presentation of accurate statements.

When establishing business records, it is essential always to include all necessary information.

Ensure adherence to internal control procedures, such as providing receipts or supporting documents.

Never create off-the-books accounts or retain falsified or incomplete records.

Should you notice an entry or form that does not appear entirely accurate, if you suspect any fraudulent activity, or if you feel uneasy about the preparation, modification, concealment, or destruction of documents in a manner that violates company policy, promptly report your concerns to your manager or the internal audit compliance department.

- You are responsible for maintaining accurate and complete records in accordance with relevant laws and regulations.

Information Security

Information and information systems are fundamental to the company's operations and processes. Incidents involving breaches of confidentiality, integrity, or availability of information can have costly and detrimental effects on our reputation.

Data generated, stored, transmitted, or received on our systems may be monitored, reviewed, and disclosed by employees. Therefore, there should be no expectation of personal privacy when using the company's systems or infrastructure.

Protecting information and data involves compliance with data protection laws and applicable information protection principles.

Consider the following regarding personal data retention:

- Collect and use it fairly and lawfully.
- Ensure accuracy, relevance, and currency.
- Securely store it as required by laws, regulations, and pertinent contractual terms.
- Disclose it only to authorized parties.
- Retain it for no longer than necessary.

Code of Conduct – Investment House

Respect individuals' rights regarding their personal information, including:

Compliance with information security and protection policies, especially in:

- Avoiding sending sensitive information outside our network without encryption or approved security measures.
- Refraining from sending confidential information to personal email accounts.
- Abiding by software licensing agreements and respecting intellectual property rights.
- Abstaining from using company computers and networks for illegal activities or activities that may compromise the company's reputation or interests.
- Safeguarding passwords and refraining from sharing them with others or retaining another person's password.
- Abstaining from unauthorized attempts to access systems, shared files, or network areas and refraining from attempting to transfer information from them.
- Avoiding unauthorized alterations to electronic assets' functions, tasks, or organizational structure under employee management or surveillance.
- Preventing sensitive information from being left unattended, including laptops and portable devices.
- Avoiding the disclosure or discussion of sensitive, private, or confidential matters in public spaces, including the internet (e.g., public email, social media, etc.).

Compliance with Audits

Compliance with accounting audits, summonses, and investigative procedures necessitates full cooperation with both internal and external auditors, regulatory oversight bodies, and legislative authorities in the country. Immediate responsiveness is expected, requiring the timely provision of accurate and precise information to these parties.

Under no circumstances should documents be concealed, modified, or impede audits and investigations.

We must refrain from inappropriately influencing any auditor or investigator and avoid encouraging others to do so to ensure proper response to audit-related requests or inquiries.

For appropriate handling of requests or inquiries concerning audit procedures, you must promptly contact the relevant management to receive appropriate guidance.

If there are questions regarding the appropriateness of a request from the auditor or if you believe someone has provided misleading, incomplete, or inaccurate information, you should promptly contact your manager or compliance management.

Code of Conduct – Investment House

Relationships with Legislative Authorities and Auditors

We aim for excellence in compliance by meeting all relevant legislative and regulatory requirements. Maintaining a robust and positive relationship with legislative bodies and other governmental authorities is crucial to sustain our business success.

Employees are expected to be forthright, cooperative, and prompt in their responses to regulatory and internal and external auditors, fully informing them of matters they should be aware of.

It is imperative for everyone to:

Refer all inquiries from regulatory bodies to the compliance officer and then to the CEO.

Avoid contacting regulatory bodies unless authorized by the compliance officer, CEO, or board chairman.

Conflicts of Interest

It is important to avoid situations or appearances where personal interests conflict with those of the company or our clients.

Conflict of interest arises or appears when personal circumstances affect professional judgment or the ability to act in the best interest of the company or our clients.

We are all expected to act in ways that benefit Investment House and exercise prudence at all times. Thus, we are all obligated to perform our duties without any actual or potential conflict of interest.

Conflict of interest encompasses any activity, investment, interest, connection, or relationship that conflicts with the company's interests and objectives or seems to do so. The mere appearance of a conflict of interest can damage your reputation and the company's reputation.

It is crucial to avoid situations or appearances where personal interests conflict with those of the company or our clients. Conflict of interest arises or appears when personal circumstances affect professional judgment or the ability to act in the best interest of the company or our clients.

Avoidance of Conflicts Interest

It is challenging to identify all circumstances that might lead to actual or perceived conflicts of interest. Hence, exercising good judgment and seeking advice from the compliance officer when unsure of the best course of action is essential in these situations.

Examples of situations that may lead to a conflict of interest include:

- Personal interests in external affairs.
- Employment or working with relatives or closely associated individuals.
- Using personal accounts or leveraging your position in the company to gain unfair advantage or access to internal information not available to the ordinary person.

Code of Conduct – Investment House

- Taking actions on behalf of the company in transactions where the employee or any of their relatives or acquaintances have financial interests or personal relationships.
- You are responsible for identifying and disclosing any conflict or potential conflict of interest to your department head, the HR manager, and the compliance officer.

Personal Finances

Handling your personal financial affairs responsibly and ethically in compliance with the law is necessary to avoid situations that could negatively impact the company.

In general, it is not permissible to:

Engage in personal financial transactions with colleagues, clients, or suppliers, including involvement in investment activities (unless it is part of an investment plan managed by the company).

Borrow from or lend to clients or suppliers.

Conflict of interest is not a violation in itself of the code of conduct, but failure to disclose it or potential conflicts constitutes a violation.

If you suspect a conflict of interest, speak immediately to your manager or compliance management.

We contribute by disclosing existing or potential conflicts, fostering a culture of honesty, and allowing the company to explore solutions.

Protection of Company Assets

It is the responsibility of the employee to safeguard the company's assets against theft, loss, waste, or misuse.

These assets should be used solely for legitimate company activities.

Company assets include:

- Office furniture, equipment, and supplies.
- Software, information systems, and support systems.
- Documents and data (both printed and electronic).
- Cash and securities.
- Intellectual property.
- Customer relationships.

Without access to assets and specific information, our ability to innovate and improve will be hindered.

Physical assets, confidential information, and intellectual property play a crucial role in our competitiveness and ability to deliver more.

Code of Conduct – Investment House

Physical assets, such as machinery, equipment, technologies, facilities, and any other tangible assets we use in our work, have obvious benefits. We all use these resources daily and share the responsibility to protect them from damage, theft, loss, or misuse. Non-physical assets are no less important than physical ones.

Confidential information and intellectual property guide our operations, give us a competitive edge, and are not disclosed to the public to prevent damage to our company or benefit to our competitors.

Confidential information includes but is not limited to:

- Business strategies.
- Acquisition strategies and goals.
- Technical data and operations.
- Information about customers, suppliers, and prices.
- Sales strategies and forecasts.
- Strategic plans.
- Budgets and other financial information.

Regardless of the form of such information, confidential information must be protected, avoiding discussion or access in public places where others can see or hear it.

Never leave confidential information or devices containing such information unattended, even for a short period. Safeguarding our devices with passwords prevents this information from falling into the wrong hands.

If you suspect an actual data breach or an attempt, you must report it immediately. Additionally, we should avoid sharing confidential information with external parties or even with our fellow employees who do not need to know for business purposes.

Intellectual Property Rights

We own all intellectual property rights that any employee develops during their work with the company. Intellectual property rights cover strategic proposals, business plans, internal policies, guidelines, procedures, improvements, ideas, and other operations related to the company.

Intellectual property (among other important non-material assets) includes:

- | | |
|-----------------|-----------------|
| - Copyrights | - Patents |
| - Trademarks | - Trade secrets |
| - Design rights | - Innovations |
| - Systems | - Processes |
| - Logos | - Brand names |

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Intellectual property is protected by law, similar to tangible assets. If you use or create intellectual property during your employment, you are responsible for keeping it secure. All intellectual property rights created using company materials or during company work, on the company's dime, or within the scope of our duties, belong to the company. If you wish to use intellectual property for another entity, you can only do so within the limits permitted by law or if you have permission from the information owner.

Importance of Maintaining Secure Workplaces

Maintaining secure workplaces is essential to ensure the company's operations and its employees work in a safe environment, preserving our intellectual property, personal data, sensitive business information related to our customers, suppliers, and other crucial materials.

Furthermore, maintaining a secure work environment allows us to create a more flexible workplace with fewer physical constraints, improving employee efficiency by reducing factors that distract attention.

Ensuring Data Privacy

The company is committed to respecting personal privacy and adheres to applicable data privacy laws. Therefore, strict adherence to laws when collecting and storing personally identifiable information related to employees, contractors, managers, shareholders, clients, and any other involved parties in business operations is essential. Personal identifiable information includes sensitive data that can be used to identify an individual, such as:

- **Government-issued identification numbers.**
- **Addresses, phone numbers, and other contact information.**
- **Medical, educational, financial, employment, or criminal history.**
- **Marital or social status.**
- **Performance evaluations.**

Access to this kind of information is limited to those who have a clear and legitimate need to know, such as human resources personnel or accountants for performing their duties. Sharing, accessing, modifying, or transferring this information should not occur unless there is a clear, legitimate, and authorized work-related need in compliance with the company's policy, privacy laws, and applicable regulations. If there is a suspected actual breach of data privacy regulations or an attempt to do so, it should be reported immediately.

Responsible Use of Technology and Social Media (Tangible and Intangible Assets)

Technological means within the company encompass mobile phones and systems. Our work requires the use of these technological means provided by the company, which may include the following assets (computers, company systems, internet connectivity, and company-provided mobile devices). Like other assets in the company, we are expected to use these technological means to perform our work tasks. Occasionally, limited personal use of these technological means is acceptable as long as it is legal, ethical, and does not conflict with our daily work.



Compliance in Communication

When communicating with others online or via email, we need to maintain a professional manner. Electronic communications are easily retrievable and can be altered or forwarded without our knowledge. Therefore, never compose anything that could potentially embarrass you or the company if made public. This means that emails, instant messages, and other communications crafted using company technological means should not contain offensive, defamatory, or vulgar language, even if intended humorously. Under no circumstances is it appropriate to download or send materials that could be deemed discriminatory, harassing, illegal, or unethical.

Social Media

Social media can include social networking sites, blogs, broadcast media, Wiki websites, personal websites, image and video-sharing sites, forums, and various other internet tools. If you are not an official spokesperson for the company, refrain from discussing company matters online, including commenting on your work or other employees' work. Always avoid disclosing any confidential, proprietary, or trade secret information of the company.

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Speaking About Our Company

Authorized Official Spokespersons

Transparency and honesty with the public are essential to maintain our reputation as a trusted institution. We owe it to our investors and all stakeholders to communicate our business objectives, and there should be an authorized official spokesperson representing our company.

If you are not an official company spokesperson, any requests for information should be referred to the company's marketing department or investor relations department for communication with the media, analysts, or others in the community. Only authorized official company spokespersons are allowed to make statements on behalf of the company.

Never attempt to answer these questions yourself or speak on behalf of the company.



Code of Conduct – Investment House

Acknowledgment and Commitment

I acknowledge by signing below that I have received a copy of the Code of Conduct for Investment House Company (referred to as "the Code"). I am aware that I am responsible for familiarizing myself with the principles, guidelines, and instructions outlined in this document and am committed to following and applying them to the fullest extent.

I acknowledge that I have not only read the Code thoroughly but understand it, and I will abide by its directives. I understand that I have a significant and ongoing obligation to voice my concerns when I suspect a violation of this Code, company policy, or the law or if I have any questions about any matter.

I have been asked in this document to disclose any conflicts of interest. In accordance with this request, I hereby declare (select one):

☐ I have nothing to disclose

☐ I wish to make the following disclosures. Please provide a brief explanation below. Even if disclosed previously

.....

.....

.....

I understand and agree that from now on, I must report any new or additional situations I encounter that may lead to a conflict and that I will disclose them promptly to the appropriate individuals.

Finally, I acknowledge that failure to comply with the Code or policies may result in disciplinary actions, including termination of employment.

Name:

Signature:

Date:

Code of Conduct – Investment House

Document's Name	Date of Issue	Version No.	Classification	Document	Notes
Code of Conduct	15/03/2023	02 nd	Internal Company Regulations, Policies, and Procedures.	General	

It has been prepared by / Compliance Officer

Reviewed and overseen by Mr. / Chief Executive Officer.

Approved by Mr. / Chairman of the Board and Managing Director.