



HAYEL SAEED ANAM & CO
YEMEN REGION

Code of Conduct and Ethics

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Letter from
Yemen Region
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Please read this document carefully and use it as a point of reference for your day-to-day work at, and on behalf of, HSA. It serves as a benchmark for all employees and should be reviewed regularly.

NABIL HAYEL SAEED

Dear Colleagues,

Since its foundation in 1938, HSA has always had a clear vision and an ethical message based on our authentic legacy and our founding values of doing well by doing good and bringing happiness to the lives of those we touch. Through a consistent commitment to these values, Hayel Saeed Anam name has always merited trust.

Through serving communities, we have built trusted brands and grown our operations to span the length and breadth of Yemen, acting as a force for progress for our group at the center of global trade networks – across Asia, Africa, and the Middle East and Europe.

As our business grows, governing adherence to our founding values became crucial to maintain a firm commitment to our employees, customers, and the broader community and enhance HSA's Corporate compliance with relevant laws, including human rights global standards.

To this end, we have issued this crucial Code of Conduct & Ethics to guide our actions and form the basis of our approach based on our inherited values and core principles, considering all stakeholders.

As a corporate reference, this Code will govern Group policies and procedures guiding employees to act by our values to create a work environment that reflects our identity, culture, and beliefs. This document will cement HSA image as a global citizen who operates by international rules and standards and supports the principles stipulated in international frameworks on anti-terrorism, anti-money laundry, anti-corruption, social responsibility, and human rights.

Therefore, I would like to underline the importance of this Code, expecting everyone to read, understand and comply with it as our reputation, as an organization, depends on activating it showing unwavering commitment to our values at all levels which

Each individual is fully accountable for safeguarding HSA's brand image by serving as model representatives, embodying our core values, and ensuring that what he does every day maintains Hayel Saeed Anam's merit in trust and quality.

Yours sincerely,

Nabil Hayel Saeed
Managing Director
HSA Group, Yemen



2 Scope of this Code of Conduct and Ethics

This Code of Conduct and Ethics (hereinafter referred to as “the Code”) is applicable to all employees of Hayel Saeed Anam & Co. Group – Yemen Region (hereinafter referred to as “HSA Group” or “The Group”) and any of its subsidiary companies as well as anyone who acts on its behalf or represents it in interactions with third parties.

All these parties must comply with this Code, regardless of the location of their workplace, the nature of their role, or their employment level, including but not limited to:



The executives, officers, directors, employees, and others that may represent HSA Group.



Employees of all subsidiaries in which HSA Group has a controlling share, or voting rights, or which HSA Group has the right to control or manage.



All agents with agency contracts, consultants, contractors, and any other party who represents or acts on behalf of HSA Group.



3 Our Responsibilities

HSA Group supports and encourages its members to perform their role to the best of their ability, in accordance with global best practice and professional standards of behaviour.

All our employees are expected to:

- Read, gain a good understanding and commit to the standards of behaviour outlined in this Code.
- Perform your role and responsibilities to the best of your abilities.
- Act with transparency and integrity.
- Take responsibility for your actions.
- Apply this Code on a day-to-day basis so that it becomes normal behaviour and practice.

In addition, our leaders and managers are expected to:

- Set an example and inspire ethical conduct and compliance from others.
- Make sure that your team members are aware of and understand this Code.
- Hold your team members accountable for complying with our Code.
- Create a work environment in which your team members feel comfortable expressing opinions with confidence.
- Detect and prevent any non-compliance or violation of company policies, this Code or any applicable law or regulation.
- Protect the identity of whistleblowers or complainants.
- Respond to any potential or actual violation of the company policies including this Code or any applicable law or regulation once it is raised.
- Ask for help to resolve any issues or concerns and escalate them when necessary.



4 General Guidelines

This Code is designed to support everyone at HSA Group, partners and employees alike, to comply with all applicable laws, rules and regulations as well as HSA Group's policies and standards. Because no code can address every situation, these guiding principles have been developed to aid decision making and shape behaviour across the Group.

We are one Group: What one of us does impacts all of us. We must act with integrity in all our dealings, everywhere, every day.

We treat everyone fairly and with dignity: At HSA Group, we have embraced diversity, inclusion and equality of opportunity since our founding. There is no place for prejudice, discrimination, bias or abuse in our culture and such behaviours will not be tolerated.

We are competitive, but we compete fairly: We treat all our clients, suppliers, competitors, and any other parties with honesty and integrity and do not engage in anti-competitive behaviour.

We are truthful and transparent: Our word is our bond. We are fully committed to transparency and openness in our dealings with customers, suppliers, partners and each other.

We are responsible for what we do: We are accountable to each other for what we do, for the quality of our products and services, and for the integrity of our decisions and actions.

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We take our professional responsibilities seriously and protect the information entrusted to us: It is our duty to understand and abide by the ethical standards, customs and traditions of societies where we operate. We may be privy to sensitive and confidential information and we must respect these confidences, using technology to protect them where necessary. We absolutely do not act on or share information except in accordance with the agreements or the governing law and regulations.

We do not tolerate corrupt practices: In accordance with our Anti-Bribery and Corruption policy, we don't engage in bribery or permit anyone to do so on our behalf. Our professional conduct is guided by this Code, other company policies or applicable local laws or regulations and we must comply with the more stringent standard at all times.

We don't do business with disreputable characters: We have legal and professional obligations to know our suppliers and customers. We must conduct due diligence before beginning work for a supplier or customer or starting partnership with any external party. We reserve the right to refuse to do business with those involved or suspected to be involved in illegal or corrupt activities or whose source of funding raises suspicion or concern.

We are apolitical in all our activities: We are a strictly apolitical organisation and operate to maintain the supply of much-needed goods and services to communities in Yemen, despite the operational challenges presented by the ongoing conflict in the country. Our day-to-day activities across all operating companies are guided by our principles of impartiality and political neutrality.

We owe a duty of care to the communities we serve: We embrace our obligations as a responsible corporate citizen to use resources wisely and to give back to the communities we serve.

5 Professional Conduct and Ethics

HSA Group's success and leadership in the market are linked to the excellence of its people, and the diversity of ideas, expertise, and distinct experiences that they have. HSA Group trusts in the performance of its employees and their role in maintaining diversity, coexistence, and mutual respect and always encourages them to foster a positive work environment in keeping with the principles of compliance and ethics.

1 Personal Behaviour

HSA Group seeks to maintain an inclusive, positive environment. The company strives to be an attractive workplace for its employees, which values their talents and contribution to the business.

In light of this, those to whom this Code applies should:

- Be honest, act with integrity and strive for excellence.
- Treat your colleagues with respect.
- Contribute to HSA Group's mission and vision.
- Treat external parties with utmost integrity.

2 Protecting Assets

Anything that HSA Group owns or uses to conduct business is considered company property or a company asset.

All employees are obliged to safeguard all such assets and be proactive in preventing loss, damage, theft, waste and improper use of company property or assets.

In light of this, those to whom this Code applies should:

- Never use the company assets for personal use or gain.
- Report any property misuse, theft, damages or any need for repairs or replacement.
- Never sell, lend, or give away anything that belongs to the HSA Group without appropriate written approval.
- Protect patents, copyrights, trademarks, and trade secrets.
- Protect the company's IT system by physically protecting your assigned devices and be cautious when opening links and external emails.
- Never install unlicensed software, applications, or hardware on your computer.
- Protect confidential information.

3 Human Rights, Anti-Discrimination, Anti-Harassment, and Anti-Bullying:

At HSA Group, respect for human rights is one of our fundamental values.

At HSA Group, decisions are made without regard for race, gender, age, religion, nationality or ethnicity.

HSA Group maintains a work environment that is free from discrimination, harassment, bullying and retaliation.

HSA Group does not tolerate harassment, bullying, or any conduct that may interfere with an individual's work performance or creates an intimidating, hostile or offensive work environment. At HSA Group, decisions are made without regard for race, gender, age, religion, nationality or ethnicity.

HSA Group maintains a work environment that is free from discrimination, harassment, bullying and retaliation.

HSA Group does not tolerate harassment, bullying, or any conduct that may interfere with an individual's work performance or creates an intimidating, hostile or offensive work environment.

In light of this, those to whom this Code applies should:

- Maintain an inclusive work environment that promotes respect and tolerance amongst all employees.
- Treat others with respect and dignity.
- Never discriminate or treat anyone differently on the basis of personal traits.
- Never engage in harassment or bullying.
- Never tolerate behaviour that may constitute as harassment or discrimination and escalate appropriately.

Employees who allow harassment or bullying to continue, or fail to take appropriate corrective actions upon becoming aware of the harassment, shall be deemed to be a party to the offence, even though they may not have engaged themselves in such behaviour.

4 Confidentiality

HSA Group's employees and affiliates must not disclose non-public information or any information that may be considered confidential or commercially sensitive.

Confidentiality may extend to information about the company's customers, suppliers, other business partners.

HSA Group's confidential information may not be disclosed to third parties without authorisation.

**In light of this,
those to whom this Code applies should:**

- Protect non-public information that you have access to due to your work duties.
- Maintain confidentiality of information related to HSA Group and/or its activities and do not disclose it to any third parties – including strategic plans, salary, compensation and benefits, talent development plan, job succession plan, restructuring, marketing plans, financial performance and other data and information considered confidential or commercially sensitive by the Group.
- Never use confidential information for personal gain.
- Take the necessary steps to protect the company's confidential information while dealing with third parties by asking them to sign Confidentiality & Non-Disclosure Agreements.
- Be cautious when talking with others about your work, either in public places or on social media platforms, as it may put the company's safety at risk, including that of its employees, assets and confidential information.
- Maintain your obligation to protect confidential information even after your employment ends with HSA Group.

5 Receiving and Giving Benefits and Gifts

HSA Group prohibits its employees from asking for gifts, entertainment, favours, and other personal benefits from any party or person the HSA Group deals with.

HSA Group has a strict limit on employees' capacity to accept only token gifts of a total value of (100 USD) and with no resale value.

In light of this, those to whom this Code applies should:

- Always consider the nature of any gift, gesture and courtesy before accepting or offering it, and whether it has an effect on business decisions.
- Never exploit your position at HSA Group to gain business courtesies, and do not ask for gifts or personal favours.
- Do not accept gifts, benefits or free of charge services offered by companies, customers, suppliers, or individuals having business with HSA Group except within company guidelines such as the Gifts Policy or related instructions.
- Refuse any offer that would influence your ability to make objective decisions or would likely damage HSA Group's reputation.

Employees are required to report any offer of a gift, or entertainment, to their line managers, regardless of acceptance.

6 Anti-Bribery

At all times, HSA Group complies with applicable anti-bribery and anti-corruption laws and regulations wherever it operates.

HSA Group never offers or accepts anything of value to get business, keep business or gain an unfair advantage. A bribe is also not limited to cash.

In light of this, those to whom this Code applies should:

- Comply with anti-bribery and anti-corruption laws and regulations.
- Never offer bribes, accept bribes or let others to engage in bribery on your behalf.
- Be accurate and complete in documenting payments and expenses.
- Do not make "Facilitating Payments" unless its within acceptable gifts limits and with same conditions.

7 Conflict of Interest

HSA Group's employees must avoid any activities including taking on positions or carrying out business affairs, which can interfere or even appear to interfere with the employee's duties and responsibilities to HSA Group, or would affect the employee's decision-making in the company's best interest.

A "conflict of Interest" occurs when an employee or a member of their family are involved in business activities that can potentially impact the appropriate performance of their job or business interest.

All HSA Group's employees are required to disclose fully and honestly, and obtain written approval for all affairs, relationships, business transactions that can constitute a conflict of interest.

In light of this, those to whom this Code applies should:

- Clearly understand the company's policy regarding conflict of interest.
- Acknowledge existing and potential conflicts of interest when engaging in business activities.
- Disclose to your line manager and the compliance department any actual or potential conflicts of interest or even situations that could appear as a conflict.
- Refrain from obtaining any kind of compensation, either for yourself or your immediate family members from competitors, suppliers, contractors, and customers.
- Never accept roles as directors, officers or advisors in other organisations or governmental entities that may interfere with your job duties and affect your commitment to HSA Group.
- Never financially invest or hold more than 5% of issued shares capital in a business enterprise that does business, is seeking to do business, or competes with HSA Group or any of its subsidiaries.
- Never act in business transactions as a broker, finder, go-between, which involve any HSA Group's companies, for financial gain.
- Never hire, supervise, or conduct business with your family members, relatives or someone with whom you have a close personal relationship as part of your work for HSA Group.
- Never use or misuse the HSA Group name or the company's tangible or intellectual property, information and resources without written approval.
- Keep in mind, it's not possible to list every potential conflict of interest situation; if you're not sure if a situation presents a conflict, ask the compliance department.

8 Privacy and Cybersecurity

The safety of our assets, people, and customer information is critical for us in order to ensure a secure digital transformation. Each one of us is responsible and accountable for protecting HSA Group and its customers. The Cyber Code outlines how all employees at HSA Group are expected to behave and work in order to safeguard our cybersecurity.

HSA Group's employees shall respect the privacy of consumers, customers, colleagues, and others with whom HSA Group conducts business.

All employees should collect, handle and process personal information for pre-described parties with care and in accordance with local data protection laws.

"Personal information" is any information that could be used to identify someone, either directly or indirectly. "Personal information" includes information about anyone such as:

- Email addresses.
- Telephone numbers.
- Employee ID number.
- IP-addresses.
- Credit card information.
- Financial information.
- Names of family members.
- Name and government identification number.
- Salary and other financial compensation, talent classification or promotion plan.

In light of this, those to whom this Code applies should:

- Act as a responsible steward of personal information by following the Group's policies regarding the access, transfer and use of such information.
- Use information only for the purposes for which it was obtained.
- Only access the minimum amount of personal information necessary for the task in question.
- Do not share personal information except on a need-to-know basis with authorised people who also need the information for completing their work.
- Never share it with any unauthorised person outside of the Group or anyone in the Group who does not require the use of such information to complete their job.
- Practice good cybersecurity habits by adhering to the Cyber Code following the necessary processes when using the HSA Group's network, systems, computers, programmes, mobiles and other devices.
- Protect the privacy of your co-workers by safeguarding their personal information.

9 Protection of Trademarks and Intellectual Property Rights

HSA Group's intellectual property rights are an invaluable asset built over years of hard work and must be protected at all times.

HSA Group's intellectual property rights also include trademarks, brands, designs, recipes, logos, copyrights, innovations and patents, trade secrets, technological developments, and new products and services.

Intellectual property also includes any work product made by employees as a part of their employment with HSA Group. Any work, idea, invention or a product you create in whole or in part in connection with your duties as an employee of HSA Group or using of the Group's time, resources or information becomes the property of HSA Group.

You must not allow any third party to use our trademarks or other intellectual property rights, without proper authorisation or a licence agreement approved by the Legal Department. Our trademarks should not be used in a derogatory, intimidatory, or offensive manner.

Each of us is responsible for ensuring that our intellectual property rights are managed appropriately and for preventing their unauthorised use. It is equally important that we respect the intellectual property rights of others.

It is a further responsibility that we put in place the correct legal frameworks with our partners and suppliers that support our business objectives and effectively promote and manage risks to our intellectual property.

"HSA" is one of the most valuable brands in the region. We must protect this asset by using it responsibly and with care. You can help protect the HSA Group brand by following our brand guidelines. This will help ensure that our brand is well managed, protected and builds trust, loyalty, and admiration. If you have any questions about the use of the HSA brand, please consult Communications Department.



6 Corporate Compliance

HSA Group's success and leadership in the market are linked to the excellence of its people, and the diversity of ideas, expertise, and distinct experiences that they have. HSA Group trusts in the performance of its employees and their role in maintaining diversity, coexistence, and mutual respect and always encourages them to foster a positive work environment in keeping with the principles of compliance and ethics.

1 Compliance with Local and International Laws and Regulations

The HSA Group operates across a number of national and international markets. As such, we are required to comply with a wide range of laws, legislations, regulations and procedures enforced at all levels: local, regional and international.

It is important to keep in mind that the laws or regulations of some countries may apply, even when you conduct business outside its geographical scope and its sovereignty. Therefore, it is important to be familiar with all applicable laws, regulations and general procedures related to our business activities at home and abroad, and fully comply with them.

2 Anti-Money Laundering and Terrorist Financing

At all times, HSA Group complies with all applicable laws and regulations regarding anti-money laundering and anti-terrorism. As a result, HSA Group conducts business only with reputable customers and suppliers who are involved in legitimate business activities and who use funds derived from legitimate sources.

HSA Group performs “know your customer/ suppliers” due diligence procedures with existing and potential customers and suppliers. HSA Group examines transactions and the Global Sanction lists to discover suspicious activities. Should any potential risk be discovered, HSA Group immediately investigates the activity and stops the engagement with that party immediately.

There are robust protocols in place to identify the risks of money laundering through financial transactions with third parties and/or the relationships with trading partners and prevent such activities.

3 Compliance with Sanctions and International Trade Controls

At all times, HSA Group complies with global, regional and national sanctions laws and regulations. Many of these sanctions are based on international (e.g. United Nations), regional or national commitments that apply across the areas in which we operate. These laws prevent HSA Group from dealing with certain people, companies, countries, and in certain regions.

It is important to note that there are further requirements if you are a US citizen, dealing in US dollars, or interacting with a US product or service as US sanctions legislation applies to wherever US people, products or currency are involved.

HSA Group employees should always consult the Legal and Compliance Department for appropriate advice and guidance in this regard.

4 Accuracy of Commercial & Financial Records

Clear, complete, and accurate records and recordkeeping are the fundamental basis for a successful business, providing an honest assessment of the company's financial health.

HSA Group employees are required to accurately record and report information in business records and reports with the upmost care and attention. **As such, all employees should:**

1. Comply with regulations and internal policies regarding record keeping.
2. Keep records related to your job properly maintained.
3. Provide accurate and honest information to all business reports and records.
4. Follow the correct process to ensure that records and accounts reflect the company's transactions and financial statuses.
5. Never mislead or misinform others.
6. Never mischaracterise accounts and transactions, forge, misreport or release undisclosed or commercially sensitive information.

5 Employment Standards

All employees, contractors and suppliers must comply with all international and local laws, regulations, and legislation related to labour rights and employment standards.

All employees, contractors and suppliers are responsible to ensure that all workers must be of the legal age that allows them to work as stated in local laws and international charters.

All employees, contractors and suppliers are also prohibited from engaging in any practices classified as human trafficking, including employing persons to do their jobs using violence, fraud, or coercion. Moreover, responsible employees and suppliers/service providers must also protect workers from being subjected to abuse and/or exploitation.

The duty to comply with these standards applies to suppliers/service providers in their own business practices as well as their dealings with sub-contractors/sub-providers.

6 Corporate and Social Responsibility

Since the foundation of Hayel Saeed Anam Group in 1938, HSA Group has adopted a values-led approach to doing business, driven by the philosophy set by its founders of doing well by doing good. The Group's values prize and reward compassion, care for others and a community spirit. HSA Group is committed to supporting the Yemeni people and understands the importance of carrying out charitable works in all its forms. By remaining apolitical, HSA Group has been able to focus its efforts on living out this philosophy set by its founders and serve the communities of Yemen in their time of need.

Through being open and honest, and by respecting local cultures and traditions, HSA Group aims to gain the trust and support of its local communities.

We aim to deliver products and services that bring happiness to the lives we touch and contribute to more sustainable living by empowering individuals, contributing to wider development goals, and reducing our environmental impact. To do this, HSA Group must operate responsibly wherever we do business to maintain the trust of society.

This Code is compatible with the principles of social responsibility of HSA Group. This Code confirms and applies the principles of social responsibility, the most important of which are: transparency, governance, the respect of law, contribution to social and economic development and support for local initiatives that are compatible with the sustainable development standards and strategies for HSA Group.

7 Health & Safety Standards

Employees, suppliers and all parties dealing with the company must comply with all laws, regulations, legislation, and policies related to occupational Health & Safety of the HSA Group and the country in which we operate, or to which we will supply or provide products or services.

All employees, contractors and suppliers must act in a safe and responsible manner at all times and prioritise the Health & Safety of all parties when planning for activities or carrying out any tasks or work.

This includes but is not limited to:

1. Immediately reporting accidents, risks, near misses and unsafe situations to the line manager or the Health & Safety department.
2. Following the safe work instructions specified for each task or job in accordance with the standards set by the Health & Safety Department.
3. Group leadership is responsible to enable all employees to do business safely and protect the health and safety of everyone in HSA Group and the community for which we work, by providing all necessary resources to achieve this.
4. Leaders and managers at all levels are expected to continuously review safety performance, appreciate and acknowledge good performance at all times, and hold themselves accountable for the standard of performance to raise the level of awareness and safety culture across the group.

8 Protecting the environment

HSA Group is committed to protecting the environment in the communities and countries in which we operate.

Employees at all levels will participate, each according to their position, to minimise activities and use of resources that are harmful to the environment and to reduce any negative impact of our operations on the environment.

This includes but is not limited to:

1. Identifying and evaluating the environmental impacts associated with all activities and operations, whether existing or future, and planning to reduce them according to local or international stand-ards.
2. Providing awareness training to all employees on the environmental impact, the importance of good environmental practices, what these practices are and how to ensure their implementation.
3. Reporting environmental accidents and violations as soon as they occur to the Environmental Com-pliance Department and taking the necessary measures to prevent their recurrence.
4. Committing to reducing emissions and waste resulting from all operations using different methods such as removal, recycling, reuse, or sustainable reduction.
5. Investing in resource and energy efficiency measures and using clean energy in all our future pro-jects and existing operations whenever possible.
6. HSA Group leadership team is committed to providing all the resources and capabilities necessary to ensure compliance with the environmental standards established in the planning stage of new operations, making sure they apply to each stage of operation and implementation.
7. HSA Group leadership team is responsible to review environmental compliance performance on an ongoing basis and plan for improvement in order to reach global levels of performance in the field of environmental protection.



Group Relations



HSA Group is committed to managing its relations with partners, customers, consumers and other stakeholders in a positive, fair and transparent manner. We are also committed to building long-term partnerships that are based on shared values and strong commitment to responsible conduct.

1 Government Relations

HSA Group and its leadership and executives are apolitical and not affiliated with any administration in the country that could represent a conflict of interest. Our operations span the length and breadth of Yemen and we maintain transparent channels of communication with all relevant authorities.

HSA Group does not allow the use of political affiliation or the use of Group resources to support a particular political direction, nor must political affiliation affect an employee's job duties and the employee must not use the workplace to support any political direction.

All HSA Group members, when dealing with government officials, should exhibit the highest levels of professional behaviours and wisdom in accordance with this Code and the Group's values, and should abide by and be aware of all applicable regulations, rules and regulations in this regard.

HSA Group follows the highest ethical and legal standards in engaging with government agencies. HSA Group should remain fully committed to complying with all contractual terms, provisions, laws and regulations. We must keep accurate records related to communications with those governmental authorities, and submit the necessary documents if requested by the relevant authorities and bodies, without prejudice to the confidentiality provisions with those dealing with us.

2 Customer Relations

HSA Group continuously works to maintain the good reputation that we have built over decades operating in a range of markets. Our relationship with our customers must be characterised by credibility, justice, respect and professionalism in all instances. To maintain this, we apply the highest standards and global practices in our customer service.

Our partnership with customers is essential for our products to reach our consumers. Accordingly, we must treat our customers ethically and fairly and earn their business through the excellence of our products, customer service and competitive pricing, and we must never engage in unfair or deceptive practices.

3 Global Suppliers Relations

HSA Group deals with suppliers from all over the world. It is imperative that we make sure that our dealings are with reliable and reputable suppliers, and that our relationships with external suppliers must be based on respect and mutual trust.

It is the intention of HSA Group that all our suppliers commit to the same standards of integrity that we comply with, and accordingly, the HSA Group strives to create long-term partnerships with the best global organisations known to follow the same compliance standards.

4 Local Suppliers & Services Providers Relations

HSA Group shall manage its relationships with local suppliers and service providers by dealing only with entities and persons who comply with local laws and who follow policies similar to HSA Group.



The Media

1 Social Media

When active online or on social media, employees should adhere to the following principles:

1. Refrain from referring to HSA Group or expressing opinions on behalf of HSA Group. You should only express the opinion of or affiliate yourself with HSA Group if you are a designated spokesperson for the organisation.
2. Clearly state that all views are your own and not a reflection of HSA Group.
3. Do not enter discussions related to HSA Group as a result of your participation in any posts.
4. Do not use an HSA Group email address on social media sites for personal use.
5. Do not participate in discussions to defend HSA Group or the company status on social media, as your comments defending or clarifying the company's position could be misunderstood and misinterpreted.
6. Avoid making positive or negative business-related posts and comments about current or former employees of HSA Group, or even with HSA Group customers and suppliers on social media.
7. Avoid displaying or promoting HSA Group products or brands

2 Media Engagement

HSA Group has identified specific persons who are permitted to engage with the media on behalf of the Group and serve as a spokesperson on behalf of the Group. Individuals that have not been selected as a spokesperson for HSA Group do not have the authority to engage with or provide comment to media representatives on behalf of the Group.

It is not permissible for any employee of HSA Group to make any statements or share any information relating to the Group's activities with representatives of any media outlets on behalf of HSA Group, unless they are officially mandated to do so by the Group.



1 Whistleblowing & complaints

HSA Group encourages and empowers its employees to report violations or potential violations of this Code or any internal policies so that the company can take appropriate action and remedy the situation.

There are several different channels of reporting available, depending on the issue, including:

1. Your Line Manager.
2. HSA Group whistleblowing site.
3. Legal Affairs & Compliance Department.
4. Human Resources Department.
5. The responsible manager and specialist at your location.

2 Violation Penalties

A violation of any of the rules set out in this Code , or any HSA Group policies and regulations can cause disciplinary action corresponding to the nature and circumstances of the violation. This may include:

1. Investigation of the violation by the Compliance Department or the Legal Affairs Sector.
2. Deduction from the salary in accordance with the approved penalties list.
3. Suspension without pay and/ or loss of benefits or bonuses.
4. Termination of employment.



Commitment
to our Code
of Conduct

3 Ethical Decision-Making

Doing what is right is our goal. When you face some situations in which HSA Group does not have a related policy or set of standards, or you are unsure if a certain policy should be applied to the circumstances faced, or the right situation or action is not clear enough, you should ask all the questions below to help you make the right and ethical decision.

Ask yourself:

1. **Is it legal?**
2. **It is consistent with the HSA Group Code of Conduct?**
3. **How would this decision look to others within HSA Group and externally?**
4. **Could this decision cause any harm to HSA Group or affect its reputation?**
5. **Will I be satisfied with the announcement of my actions?**
6. **Would I be embarrassed if colleagues, friends, or family knew what I did?**

If you answer “no” to all these questions, it is likely to be no reason for concern. If the answer is “yes” or “not sure” to any of them, you should stop, and seek advice or consult the Compliance Department.

3 Enquiries & Reporting

HSA Group encourages positive communication between its members and recommends requesting more clarification on how to behave properly in different situations should there be any confusion.

Who to contact regarding this Code:

Any employee, current or potential supplier/service provider, or third party may report any breach, misconduct, or unprofessional/unethical act that constitutes a conflict with this Code, and that is related to any HSA Group employees, to the Legal and Compliance Department, through the following avenues:

1. **Send an email to:**
 - Compliance@HSA.com.ye
 - whistleblowing@hsa.com.ye
2. **File a report using the following web links to report compliance violations on the independent site powered by Navex Global (separate whistleblowing tool):**
 - Desktop: hsa-yemen.ethicspoint.com
 - Mobile: hsa-mobile.ethicspoint.com

Contact us

For Enquiries & Consultancy

Compliance@hsa.com.ye

For Reporting Concerns and Doubts & Whistleblowing of Violations

whistleblowing@hsa.com.ye

هائل سعيد انعم وشركاه
RAYEL SAIED ANAM & CO.