



Revision Number	Prepared by	Revision date	Description of change	Reviewed by	Approved by
01	HR Manager	12.03.2023	New policy	1. Chief Legal & Governance 2. Head – Internal Audit & Compliance	Owner's delegated Representatives

Code of Ethics

1.1 Overview

- 1) The purpose of this Code is to set down the employees' legal obligations while under the employment of OAPIL and which they are required to comply. This Code also provides guidelines to assist employees in understanding and complying with such legal obligations.
- 2) Employees must comply with all the requirements set out in this Code in addition to the terms and conditions of employment set out in their contracts of employment. If any inconsistency exists, this Code shall prevail. Employees who have any doubt about any provision specified in this Code should consult the Human Resources Department.

1.2 Ethics at work

- 1) Employees must devote to their work with a high degree of dedication, enthusiasm, and professionalism.

It is important that employees:

- 2) Accomplish and discharge their duties and responsibilities prudently and diligently to the best of their professional knowledge, skills, and abilities to meet the time, quality and productivity standards of work
- 3) Engage faithfully only in activities that are consistent with their official responsibilities and authority and which do not damage the business interests of the company
- 4) Utilize time, supplies, equipment, and office facilities with due caution solely for the benefit of the company
- 5) Maintain punctuality and respect the working timings; and
- 6) Behave properly always with integrity and courtesy to upkeep the OAPIL's public image as a respectable high-performance organization; and
- 7) Co-operate with fellow employees and work as a team for the benefit of OAPIL.

1.2.1 Shareholders

OAPIL is committed to guarantee transparency and equal treatment to all classes of shareholders, and to avoid preferential treatment of any class or company. We respect all applicable legislation and regulations and the independent interest of OAPIL as we seek to

create value.

1.2.2 Customers

The excellence of the products and services offered by OAPIL in terms of quality, safety and performance is based on customer care and the readiness to satisfy customer requirements. We therefore seek to assure an immediate, qualified, and competent response to customer needs, through honesty, courtesy, and cooperation.

1.2.3 Communities

OAPIL contributes to the economic welfare and growth of the local communities in Oman by delivering efficient and technologically advanced services. We are established to do business in Oman which makes us citizens of Oman, and like individual citizens we feel we have a responsibility to support the local community. It is our goal to take part in and promote projects to further the welfare of our local communities and thus be a good and contributing citizens.

OAPIL adheres to all applicable laws and regulations and maintain good relations with local, national, and super-national authorities, based on full and active cooperation and transparency.

Consistent with these objectives and with the responsibilities they have assumed towards different stakeholders, OAPIL recognize research and innovation as priority conditions for growth and success.

OAPIL view favorably and, when necessary, support social, cultural and educational initiatives directed at enhancing the individual and improving his/her living conditions.

OAPIL do not disburse contributions, advantages or other conveniences or things of value to government officials (including employees of state-owned or controlled entities or enterprises), political parties, or trade union organizations, nor to their representatives or candidates, except as permitted by applicable laws and by the provisions of this Code and other applicable OAPIL policies.

1.2.4 Suppliers

OAPIL recognizes the key role of suppliers in improving its ability to satisfy customers' needs. Therefore, OAPIL promotes the development of durable relations with suppliers, in a reciprocal approach of lawfulness, transparency, honesty and collaboration, as commonly accepted principles of business ethics.

To ensure that purchasing processes comply with the ethical principles adopted, OAPIL can introduce, for certain supplies, social, health and safety or environmental prerequisites, whose violation can trigger disciplinary actions, including possible termination of business relations. Agreements with suppliers whose operations are in certain countries – categorized as being “at risk” by recognized organizations - can include clauses with reference to specific requirements or the possibility for OAPIL to hold inspections at the offices or plants of the supplier in order to verify that such requirements are being met.

1.2.5 Human Resources

OAPIL recognizes the central role of human resources as an essential factor for success in its business activities. The professional contribution of employees, in a framework of mutual loyalty and trust, is therefore considered as a crucial element for the development of OAPIL's activities.

OAPIL safeguards safety and health in working environments and considers the respect of worker rights fundamental to the carrying out of business activities. OAPIL promotes equal opportunities and enhances the professional development of individuals, forbidding any sort of violence or harassment, either sexual or based on personal, political, and cultural diversity.

1.2.6 Environment

OAPIL believes in a global sustainable growth in the common interest of all stakeholders, present and future. All investment and business choices are consequently fashioned to respect the environment and public health.

Without prejudice to compliance with specific enforceable regulations, OAPIL takes environmental issues into consideration when defining their choices, also by adopting – if

operationally and economically feasible – eco-compatible production technologies and methods, with the objective of reducing the environmental impact of their activities.

1.3 Conflict of Interest and Disclosure

- 1) Employees shall avoid any situation that may create or appear to create a conflict between their personal interests and the interests of the Company.
- 2) Employees should make disclosures of any interest(s) of self / close relative in any business which is in competition with any business of the Company. Examples of conflict of interest may be the following:
 - a. Being in a position to employ a close relative
 - b. Disclosing information to any external parties
 - c. Business dealing (financial/non-financial) with related parties/ relative.

1.4 Information – Books and Records

OAPIL is aware of the importance of correct information on its own activities for the investors and the community at large.

Consequently, to the extent compatible with the confidentiality requirements inherent in conducting a business, OAPIL strives for transparency in their relations with all stakeholders. OAPIL communicates with the shareholders/investors according to principles of honesty, clarity, and equal access to information.

OAPIL maintains books, records, and accounts in reasonable detail to reflect all their transactions accurately and fairly, and to retain relevant documentation in accordance with OAPIL's policies concerning record retention.

OAPIL and Covered Parties must never, under any circumstance, engage in inaccurate, false, or misleading record keeping, even if one might reasonably believe the consequences of the inaccuracy would be harmless. This policy of full, fair, accurate and timely recording of information extends to time reports, expense reports and all other similar compulsory corporate documents.

No false or artificial entries shall be made in the books and records of the OAPIL. No undisclosed or unrecorded funds may be established.

“Off the books” payments are prohibited.

No individual shall ever engage in any arrangement that results in a prohibited act.

1.5 Gifts from Suppliers/ Customers

- 1) No employee shall, either directly or indirectly, accept gifts either in cash or in kind from suppliers/customers either in the Sultanate or abroad.
- 2) This will, however, exclude New Year or seasonal gifts [in the form of table items, key chains, diaries, sunscreen for vehicle etc.] of nominal value, but will include provision of free transport, boarding or lodging or any other service or facility to the employee or to his family / relatives / friends, whether specifically requested for or otherwise.
- 3) Acceptance of a gift from a person or a body that might influence or likely to influence the decision of the employees is prohibited.

1.6 Export Controls and Economic Sanctions

It is the policy of the OAPIL to comply with all applicable export control laws. All OAPIL employees must comply with these laws. Under no circumstances are OAPIL’s employees permitted to make a transfer, export, re-export, sale, or dispose of any product, technical data, or service contrary to applicable export control laws.

OAPIL will comply with all economic sanctions against certain entities and countries, including applicable economic sanctions imposed by the UN, the EU, and other jurisdictions in which OAPIL conducts business.

1.7 Prevention of Money-Laundering, Handling of Stolen Goods and Use

OAPIL is aware of the key role that we play in the fight against money-laundering, handling of stolen goods and self-laundering.

Therefore, OAPIL is committed to implementing measures to combat money-laundering. In addition to other duties and responsibilities, it is strictly forbidden to:

- buy, replace or transfer money, goods or other assets if there is knowledge of their criminal origin, or perform any other operations that might lead to concealing their illegal origin
- replace or transfer money, goods or other assets having criminal origin, or perform any

other operations that might lead to concealing their criminal origin

- use money, goods, or other assets for economic or financial activities if there is knowledge of their criminal origin.

1.8 Penalty Regulations

In reference to the Omani Ministry of Labor’s Ministerial Decision Number 129/2005 about the Penalty Code, please go through the following timetable carefully which demonstrates the violations and penalties that may occur:

Type of Violation	Degree of Penalty and Percentage of Deduction from Daily Wage				Remarks
	1 st Time	2 nd Time	3 rd Time	4 th Time	
<u>First: Violation Relating to Working Hours:</u>					

Type of Violation	Degree of Penalty and Percentage of Deduction from Daily Wage				Remarks
	1 st Time	2 nd Time	3 rd Time	4 th Time	
1- To arrive to work up to 15 minutes late without permission or acceptable excuse, if such delay would not disrupt the work of other employees.	Warning Letter	5%	10%	20%	The Employee shall not be held accountable if transportation is arranged by the Company from his/her residence to his/her place of work.

<p>2- To arrive to work up to 15 minutes late without permission or acceptable excuse, if such delay would disrupt the work of other employees.</p>	<p>Warning Letter</p>	<p>15%</p>	<p>25%</p>	<p>50%</p>	<p>In case of violations relating to arriving late to work or leaving work before the end of the working day without permission or acceptable excuse, the employee would be entitled to his/her wage for the worked hours only. Moreover, the employee will be subject to the penalty prescribed for arriving late or leaving work without permission or acceptable excuse.</p>
<p>3- To show up 15 - 30 minutes late for work without permission or acceptable excuse, if such delay would not disrupt the work of other employees.</p>	<p>10%</p>	<p>15%</p>	<p>25%</p>	<p>50%</p>	
<p>4- To show up 15 - 30 minutes late for work without permission or acceptable excuse, if such delay would disrupt the work of other employees.</p>	<p>15%</p>	<p>25%</p>	<p>50%</p>	<p>One Full Day</p>	

Type of Violation	Degree of Penalty and Percentage of Deduction from Daily Wage				Remarks
	1st Time	2nd Time	3rd Time	4th Time	
5- To show up 30 - 60 minutes late for work without permission or acceptable excuse, if such delay would not disrupt the work of other employees.	25%	50%	75%	One Full Day	In case of violations relating to arriving late to work or leaving work before the end of the working day without permission or acceptable excuse, the employee would only be entitled to his wage for the worked hours. Moreover, the employee will be subject to the penalty prescribed for arriving late or leaving work without permission or acceptable excuse.
6- To show up 30 - 60 minutes late for work without permission or acceptable excuse, if such delay would disrupt the work of other employees.	50%	75%	One Full Day	One and a Half Day	
7- To arrive to work more than 60 minutes late without permission or acceptable excuse, whether such delay would disrupt the work of other employees or not.	Such an employee may not be allowed in and shall be considered absent without permission, or he/she may be allowed in, provided that his/her wage for the delay hours shall be forfeited. Moreover, the employee will be subject to the penalty prescribed for absence without excuse for the first time.				

Type of Violation	Degree of Penalty and Percentage of Deduction from Daily Wage				Remarks
	1st Time	2nd Time	3rd Time	4th Time	
8- To be absent without permission or acceptable excuse.	25%	50%	One Full Day	Two Days	Moreover, the employee's wage for days of absence shall be forfeited.
9- To leave work before the end of the working day without permission or acceptable excuse, or to stay at the company or return to it after the end of the working day without justification.	Warning Letter	25%	50%	One Full Day	
<u>Second: Violations Relating to Work System:</u>					
1- To go out from other than the designated exit, if the Company's instructions so require.	25%	50%	One Full Day	Two Days	
2- To receive visitors other than the Company's employees without the management permission.	25%	50%	One Full Day	Two Days	
3- To eat at a place or time other than the designated place and time.	25%	50%	One Full Day	Two Days	
4- To sleep during work in cases not entailing permanent attention.	25%	50%	One Full Day	Two Days	

Type of Violation	Degree of Penalty and Percentage of Deduction from Daily Wage				Remarks
	1st Time	2nd Time	3rd Time	4th Time	
5- To use the Establishment's phone for personal purposes without permission.	25%	50%	One Full Day	Two Days	
6- To be at places other than the employee's place of work during the working hours without justification.	25%	50%	One Full Day	Two Days	
7- To fail to advise/ disclose on the change to the employee's contact details within a week without an acceptable excuse	50%	One Full Day	Two Days	Three Days	
8- To tamper with evidence of his/her attendance and departure.	50%	One Full Day	Two Days	Three Days	
9- To violate or disobey work instructions.	50%	One Full Day	Two Days	Three Days	
10- To fail to follow instructions relating to work.	One Day	Two Days	Three Days	Five Days	Provided that such instructions are in Arabic and English and placed at a conspicuous place at the work premises.
11- To incite breach of written orders and instructions relating to work.	One Day	Two Days	Three Days	Five Days	Provided that such instructions are in Arabic and English and placed at a conspicuous place at the work premises.

Type of Violation	Degree of Penalty and Percentage of Deduction from Daily Wage				Remarks
	1 st Time	2 nd Time	3 rd Time	4 th Time	
12- To be negligent at work in such a manner that would adversely affect the health and safety of employees or cause damage to materials and equipment.	One Day	Two Days	Three Days	Five Days	Provided that such instructions are in Arabic and English and placed at a conspicuous place at the work premises.
13- To sleep during working hours in cases entailing permanent attention.	One Day	Three Days	Five Days	Dismissal with end of service benefits	
14- If an employee was found under the influence of alcohol or psychotropic drug during the working hours.	Dismissal without end of service benefits				This penalty is imposed in accordance with Para. (7) of Article (40) of Labour Law No. (35/2003)
15- To smoke at places declared as "No Smoking Areas" at the work premises.	Two Days	Three Days	Five Days	Dismissal with end of service benefits	In order to maintain the safety of employees' workplace.
16- To deliberately decrease production or be negligent resulting in low quality of work.	One Day	Two Days	Three Days	Five Days	

Type of Violation	Degree of Penalty and Percentage of Deduction from Daily Wage				Remarks
	1 st Time	2 nd Time	3 rd Time	4 th Time	
17- To fail to abide by the instructions to be followed for the sake of the safety of employees and workplace.	Warning Letter	Dismissal without end of service benefits			This penalty is imposed in accordance with Para. (3) of Article (40) of Labour Law No. (35/2003). *Provided that such instructions are in Arabic and English and placed at a conspicuous place at the work premises and that the violation thereof would cause a gross damage to the workplace or employees.
<u>Third: Violations Relating to Employees' Conduct:</u>					
1- To bring things not allowed to the workplace or to perform commercial transactions at the workplace.	One Day	Two Days	Three Days	Five Days	
2-To raise subventions or monies without permission.	Warning Letter	25%	50%	One Day	
3- To write statements or phrases or to post announcements without permission.	50%	One Day	Two Days	Three Days	
4-To squander materials without an acceptable excuse.	50%	One Day	Two Days	Three Days	

Type of Violation	Degree of Penalty and Percentage of Deduction from Daily Wage				Remarks
	1 st Time	2 nd Time	3 rd Time	4 th Time	
5- To use materials or machineries for personal purposes.	One Day	Two Days	Three Days	Five Days	
6- To refuse to perform the job assigned to him/her without justification, provided that it does not materially differ from his/her original work.	Warning Letter	To prove such refusal in a report and such employee would be deemed to have resigned.			
7- To make false allegations against superiors or peers resulting in the disruption of work.	50%	One Day	Two Days	Three Days	
8- To breach health stipulations issued by the competent authorities in relation to work.	75%	One Day	Two Days	Three Days	
9- To refuse to be inspected upon leaving work.	One Day	Two Days	Three Days	Five Days	
10- To pretend to be sick.	One Day	Two Days	Three Days	Five Days	
11- To abstain from undergoing medical examination at the request of the Establishment's physician without an acceptable excuse.	One Day	Two Days	Three Days	Five Days	
12- To misbehave or misconduct at the workplace.	Written Warning	50%	One Day	Two Days	

Type of Violation	Degree of Penalty and Percentage of Deduction from Daily Wage				Remarks
	1 st Time	2 nd Time	3 rd Time	4 th Time	
13- To utter words afflicting customs and traditions, indecent or expressing disrespect for others' religion or doctrine during work.	One Day	Two Days	Three Days	Five Days	
14- To quarrel with colleagues and to cause riots at the workplace.	One Day	Two Days	Three Days	Five Days	
15- To commit minor assaults against superiors or against a colleague.	Two Days	Three Days	Four Days	Five Days	
16- Not to deposit the collected cash in the Establishment's account in due course without justification.	Two Days	Three Days	Five Days	Dismissal with end of services benefits	
17- To give money or gifts to any of the Establishment's employees aiming at influencing him/her for the purpose of making benefit of such a conduct in relation to the Establishment's business.	Dismissal with end of service benefits.				
18- To accept money or gifts from any person with a view to enticing the employee into carrying out any work in relation to the Establishment's business.	Dismissal with end of service benefits.				