



شركة دوبا للتجارة والصناعة
Dopa Co. For Trading & Industry

CODE OF CONDUCT

Dear Valued Supplier,

Dopa Co. for Trading & Industry has a strong and long-term commitment to social responsibility. It is also proud to be committed to the highest ethical and legal standards in the conduct of its business.

The Code aims to ensure the effective enforcement of applicable laws and regulations, including in particular those pertaining to protecting Integrity and combating corruption, As well as to encourage the proper fulfilment of social and environmental best practices. Our second main goal is to work through a transparent and responsible business partnership. Dopa Co. is strongly committed to work with suppliers and partners who comply with these standards.

We invite you to read, acknowledge and comply with the Code. We also request you to actively communicate and convey this Code to your employees and to ensure that it is enforced and complied in a proper manner by all.

We are confident that your commitment to the social responsibilities, corporate values of integrity, commitment to environmental responsibility, fair practices and ethical conduct will enable you to successfully fulfil these fundamental expectations.

We look forward to your feedback and to continue a sustainable and prosperous relationship with you.

With kindest regards,
Dopa Co.

GUIDELINE STATEMENT

Dopa Co. for Trading & Industry (Dopa Co.) is proud of its commitment to always conduct business with the highest degree of integrity and in full compliance with applicable laws and regulations. This commitment to integrity and high ethical standards extends to Dopa's dealings with all of its vendors, suppliers, and contractors (collectively, "Suppliers"). It is through this commitment we seek to ensure that we conduct our business in a responsible manner. We expect our Suppliers to have a similar commitment. It is the Supplier's responsibility to achieve and maintain the minimum standards outlined in this Supplier Code of Conduct (Code), and train employees and contracted parties on their consequential rights and responsibilities.

Dopa Co. will assess its Suppliers' compliance with this Code, and any violations of this Code may jeopardize the Supplier's business relationships with Dopa Co., up to and including termination. This Code applies to Dopa Co. business partners, suppliers and their subsidiaries, affiliates, and subcontractors (each a "Supplier") providing goods or services to Dopa Co.



COMPLIANCE WITH LAWS, CODES, AND REGULATIONS

Dopa Co. suppliers must abide by this Code and its principles, and comply with the laws, rules, and regulations of the Kingdom of Saudi Arabia and the locations in which they operate as well as all applicable treaties and international standards.

They are expected to be familiar with the business practices of their business partners, suppliers and subcontractors, and ensure they also cooperate in accordance with the standards found in this Code.

ENVIRONMENT, HEALTH, AND SAFETY

It is the responsibility of the supplier to ensure that its facilities are designed and safely operated in compliance with the established government and industry environmental protection policies and that they do not present unnecessary risks to the environment or public. Dopa Co. suppliers shall provide safe, sanitary, and healthy living quarters with reasonable personal space for all their employees.

ETHICAL BUSINESS PRACTICES

Dopa Co. and its suppliers shall conduct their businesses in accordance with the highest standards of ethical behavior. This includes complying with the US Foreign Corrupt Practices Act (FCPA) and other applicable international anti-corruption conventions. Suppliers are expected to conform to these requirements in each of the following areas:

FAIR TRADE PRACTICES

Suppliers shall not engage in collusive bidding, price discrimination, anti-competitive, antitrust, or other unfair trade practices.

ETHICAL SOURCING

Suppliers shall source goods or services from third parties that meet, as a minimum, country of origin standards for health and safety, working hours, pay, employment conditions and environment protection.

RELATIONSHIPS AND COMMUNICATIONS

Dopa Co. Business Ethics Policy requires that all transactions are to be conducted fairly, honestly, and with integrity, according to the highest ethical standards. Suppliers and their personnel shall avoid even the appearance of unethical or compromising practices in relationships, actions, or communications with regard to existing or proposed business relationships with Dopa Co.

Dopa Co. views it as conflict of interest and improper business practice for current or former Dopa Co. employees to utilize any confidential or proprietary business, technical, or other information obtained while in the service in Dopa Co. to influence Dopa's existing or proposed commercial transactions for the purpose of gaining a personal commercial advantage, or benefitting any third party, or to otherwise damage Dopa Co, whether during or after leaving employment by Dopa Co.



Suppliers shall not encourage or utilize current or former Dopa Co. employees in any manner which would cause them to disclose or provide any confidential, proprietary, or other restricted information obtained while employed by Dopa Co. to influence Dopa's existing or proposed commercial transactions for the purpose of gaining a commercial advantage.

Suppliers shall not hire, employ, engage as a consultant, procure the service, or allow acquisition of any ownership interest of the Supplier, except through a permitted passive investment, by any current Dopa Co. employee. The restriction shall also apply to any former employee who has held a position within Dopa Co. The restriction pertaining to former employees shall be valid for a period of two (2) years following the time that such individual is no longer an employee of Dopa Co.

Suppliers may seek exceptions to these restrictions from Dopa Co. Request for such exceptions should be submitted to the Dopa Co. Management. Dopa Co. will take appropriate measures to detect any such improper business practices and will take appropriate action against current or former employees and Suppliers who violate these restrictions. Suppliers are expected to cooperate with Dopa Co. investigations and to provide assistance as requested.

BRIBERY, KICKBACK AND FRAUD

No funds, assets, services, privileges, or benefits shall be paid, rendered, loaned, or promised for payment or otherwise dispersed by Suppliers or their representatives as bribes, "kickback", or other payments or inducements designed to influence or compromise the judgment or conduct of Dopa Co. or its representatives.

GIFTS, GRATUITIES AND HOSPITALITY

Suppliers and their personnel shall not offer or provide Dopa Co. or its personnel with gifts, gratuities, or hospitality unless it is unsolicited, involves nominal value and is in line with customary business practices. Nominal gifts are described as a gift of a general nature having a low value, including such items as logo inscribed pens, caps, shirts, and coffee mugs. Customary business practice in terms of hospitality would include the acceptance of reasonable business entertainment and business meals.

Gifts, gratuities, and hospitality offered or extended by Suppliers to Dopa Co. personnel which exceed nominal value or reasonable hospitality are reportable under Dopa Co. policies and regulations. Items which are made available to the general public do not fall under this Policy.

MONITORING AND COMPLIANCE

Suppliers shall be responsible for complying with the standards and requirements of this Supplier Code of Conduct and to monitor their own business activities. Suppliers shall conduct periodic internal review, inspections, and audits to ensure their compliance with this Supplier Code of Conduct and its applicable requirements. Additionally, Suppliers are responsible for ensuring that the standards and requirements of this Code are communicated, and understood by their personnel working or in support of Dopa Co. projects, jobs, contracts, agreements, and orders. Suppliers will be held responsible for the conduct and action of their employees.



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The implementation of this Policy is a shared responsibility between Dopa Co. and its Suppliers. Suppliers are to promptly disclose to Dopa Co., on a confidential basis, all current and potential incidents which give rise to the appearance of conflicts of interest and instances of unethical or fraudulent behavior by any party including Supplier employees or Dopa Co. employees, related to any Dopa Co. procurement and contracts business. Suppliers are to cooperate with Dopa Co. in any inquiries or investigations pertaining to past, current, or potential instances of unethical or fraudulent behavior or conflicts of interest related to any Dopa Co. business activity.

Suppliers are to promptly notify Dopa Co. when they become aware of any actual, or potential violation of this Code of Conduct and to communicate plans to correct and remedy such violation. Additionally, Supplier employees that become aware of violations of this Code are to notify Dopa Co.

Potential or actual violations of this Code of Conduct and other ethical irregularities are to be reported directly to Dopa Co. Management Officer by email, letter, or telephone as follows:

Email: info@dopacompany.com
Phone: +966 504122831

Address: Dopa Co. for Trading & Industry
8442 Othman Bin Affan road, Al Nuzha district,
Unit No 8443
Riyadh 12474 - 3866,
Kingdom of Saudi Arabia

All matters raised in good faith through these reporting lines will be handled in confidential, non-retaliatory manner.

Suppliers shall maintain appropriate records to substantiate compliance with the terms and conditions of this Code of Conduct and provide evidence to Dopa Co. upon request. Dopa Co. or its designated representatives may engage in periodic monitoring activities to confirm Suppliers' compliance with this Code of Conduct. These monitoring activities may include on-site inspections of facilities, use of questionnaires, review of publicly available information, or other measures necessary to assess Supplier compliance with this code of conduct. Such monitoring activities may be performed in addition to any audit rights which may be set forth in an agreement with Dopa Co. A Supplier performance assessment will be used by Dopa Co. as a factor in the selection of bidders, the administration of contracts and procurement or possibly restrict Supplier access to new Dopa Co. business opportunities.

Based on the assessment of information made available to Dopa Co., Dopa Co. reserves the right (in addition to all legal and contractual rights) to disqualify any potential Supplier or terminate any relationship with a current Supplier which Dopa Co. has found to be in violation of this Supplier Code of Conduct, without liability.



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CONFIDENTIALITY

As part of the process of seeking to provide goods, services, business partnerships or personnel (including consultants) to Dopa Co. or in providing such goods, services, or personnel under the terms of an applicable Agreement, Suppliers may gain access to information or material which Dopa Co. deems to be proprietary or confidential. Suppliers, in all instances, shall comply with the obligations of confidentiality which are set forth in the applicable request for proposal, invitation to bid, other solicitation document, or agreement by and between Dopa Co. and the Supplier. Dopa Co. views breaches of confidentiality and unauthorized disclosure or use of proprietary or confidential information very seriously and reserves the right (in addition to all other legal and contractual rights) to disqualify any potential Supplier or to terminate any relationship with a current Supplier Dopa Co. has found to have violated its obligations of confidentiality.

All advertising, press releases, or printed matter that references Dopa Co. or a Supplier's relationship with Dopa Co. must be approved by the Dopa Co. prior to publication or other use.

APPLICATION

The Supplier Code of Conduct is a general statement of Dopa's expectations and requirements with respect to its Suppliers. The Code of Conduct should not be read in lieu of, but in addition to, any Supplier obligations set forth in a) requests for proposals, invitation to bid, or other solicitation documents, or b) agreements by and between Dopa Co. and the Supplier. In the event of a conflict between this Code of Conduct and any Dopa Co. solicitation documents or applicable agreements, the terms of the applicable solicitation documents or agreements shall prevail. The requirements of this Code of Conduct are not subject to waiver. Neither Dopa Co., nor their personnel or representatives are authorized to propose or approve conduct inconsistent with this Code of Conduct.