

Code of Conduct and Ethics



Table of Contents

- 1. Introduction**
- 2. Objective**
- 3. Scope of Application**
- 4. Definitions**
- 5. Professional and Ethical Behavior Standards**
- 6. General Policies**



1. Introduction

Kuwait Telecommunication Company "VIVA" (the company) is committed to apply code of conduct and ethics standards in all its activities and business.

All company employees are required to comply with the highest ethical and professional standards regardless the place and condition.

2. The Objective

This document aims at determining Code of Conduct and Ethics which all Board members, executive management and employees are required to comply with in all their tasks regardless the workplace and conditions.

3. Scope of Application

This policy shall apply to all board members, executive management and all company employees in general. Any exceptions contained herein are approved by the board members. Any employee who violates this code of conduct shall be subject to the disciplinary procedures contained in the company's adopted list of penalties. The penalties may include work dismissal with the possibility of applying civil or criminal prosecution to the employee.

VIVA²



4. Definitions

Term	Definition
The policy	Code of Conduct and Ethics.
The company	Kuwait Telecom Company "VIVA".
Professional behavior	Each behavior in line with the company policies and the applicable laws.
Standards	Main principles regulating VIVA business.
Trading partners	All parties which the company is dealing with in its business activities.

5. Code of Conduct and Ethics

Our commitment to the highest professional and ethical standards in all our deeds and words helps us to take the right decision and represents our values and main principles Code of Conduct and Ethics. Our values are based on the following principles:

RESPECT	Means our respect to society and our work environment, our commitment to laws and legislations in the countries we are operating in. We should comply with the highest ethical and professional standards in our transactions with others including the company customers, suppliers, trading partners or any third parties.
HONESTY AND INTEGRITY	Means that we commit to keep the records reflecting the company assets, commitments, revenues and expenses accurately and clearly taking into account the decisions and financial obligations according to the delegation policy and written attorneys to delegation.
Diversity and Equal Opportunities	Means that we are interested in encouraging the culture of mutual respect for different opinions. We encourage the work environment to attract the individuals with efficiency and diversity in different skills with our commitment to consider equality and equity between all persons without any discrimination or prejudice.
Health and Safety	We ensure providing safe work environment for our employees and our society, free of causes of accidents, injuries, diseases or factors may lead to damage people in terms of public health and safety.



6. General policies

- 6-1 Every company employee shall assume responsibility for the commitment to the code of conduct.
- 6-2 Board members and executive management shall comply with all laws and instructions and shall represent all shareholders in all decisions to be taken in order to achieve the interest of company, shareholders and other stakeholders not only the interest of any specific group.
- 6-3 Not to exploit the assets of company's resources in achieving personal interests and working on using these assets optimally in order to achieve the company targets.
- 6-4 Employees and all stakeholders are responsible for reporting violations without exception in case of noting incorrect, unsafe, and non-ethical or which probably causes any damage. Employees and stockholders shall inquire immediately on the probability of violating ethical and professional behavior standards, violations and penalties in this respect.
- 6-5 The company believes that respect is a natural right for all individuals and that company employees are the source of value, so the treatment method reflecting the encouragement and evaluation towards different individuals, opinions, abilities and talents of the company is one of main principles to deal inside the company including the views of others.
- 6-6 All employees shall be in the appropriate professional appearance during the official working hours through maintaining the accepted standards of care about personal appearance and appear in the



appropriate professional appearance at all times. All managers shall be responsible for monitoring and maintaining the appropriate appearance in their departments. The department of labor relations in the human resources department should be noted for all violations related to appropriate appearance in work.

6-7 The conflict of interests is one of the matters that violates company's integrity so all board members, executive management and company employees shall comply with the policy of conflict of interests, related laws and legislations.

This includes the company's responsibility for carrying out its works ethically with all customers, shareholders, suppliers, competitors and organizers.

6-8 The company is committed to perform its works with all customers, shareholders, suppliers and competitors ethically. The company shall select products and services on the basis of price, quality and benefit. On contrary, the company expects that all its customers shall follow the same standards when purchasing its products and services taking into account the neutrality and objectivity away from its external effects in all business dealings. Symbolic gifts, services and entertainment may be used to strength the commercial relations, media and advertisements however it is prohibited to accept or submit gifts in the following cases:

- A gift, service or entertainment may not be accepted or given if it was seemed to obligate the recipient to accept a certain matter or may be considered as an attempt to affect the good judgment.
- Employees of company are prohibited to present or accept any cash amounts or its equivalent when it is related to trade transaction. Also they are prohibited to submit promises, loans or



investments of any kind without compliance to delegation policy and its related requirements for keeping records.

- The company employees, in case of business dealings with representatives, employees, governmental officials, shall firstly understand the applicable laws and also local customs and traditions and not to offer or accept gifts which may violate applicable laws or customs and traditions.
- No employee, any of his relatives, agent or any of his relatives shall not be entitled to offer, accept or receive a gift or entertainment from clients or suppliers if it is:
 - Cash or coupons of gifts to be replaced by cash.
 - Not in line with trading practices.
 - Exaggerated in its value (is to or exceeding KWD 100 or its equivalent).
 - It could be explained as remuneration for the business dealing, bribe or a payment for violating the applicable laws including the bribe of governmental employees.
 - It may cause embarrassment to the company or weaken the confidence in the company in case of revealing it.

6-9 The company takes into account the free, fair and open competition in business. It means the commitment to ethical competition in line with laws supporting commercial competition and fighting monopoly and illegal trade. The company carries on advertisement, promotion and marketing for its products and services in a real and honest transparent manner.

6-10 Each employee shall ensure the absence of any false or intentionally misguided data in the company records whatever its kind (book or electronic records). Intentionally false classification for the transactions of accounts, departments or accounting periods is



considered violating to the law and this conduct. Therefore, all dealings should be supported with accurate documents with its appropriate details and registering them in the correct accounts within the appropriate accounting period.

VIVA[®]



6-11 Board members, executive management and company employees are prohibited to utilize data which they are read in virtue of their positions for their personal interest. Also, disclosure of any data concerning the company is prohibited except for in the cases in which the disclosure is allowed or according to the legal requirements. All company employees and officials should comprehend and follow the controls of data security adopted by the company.

6-12 The protection of individuals and environment is an integral part of company's principles and targets. Therefore, every company official or employee shall ensure that all standards and products shall meet the highest environmental standards specified by the company's governmental laws and regulations whichever is stricter.

6-13 The company is committed to provide a working environment free from prohibited materials in order to ensure the protection of health, safety and security of its employees and also performing its functional tasks and protecting all who are dealing with company's locations and properties. Taking prohibited substances affects negatively on productivity and commitment to work hours and professional safety. It is prohibited to use, own, sell, distribute, hide, transfer and manufacture drugs, alcoholic drinks or narcotic drugs requires a medical recipe or methods of taking drugs in affiliated facilities or vehicles either in the work headquarter or when performing any work concerning the company out of its affiliated locations.

The employee who is proved that he works under the effect of alcohol and drugs or who is unfit to work because of taking prohibited substances shall be subject to disciplinary procedures including work dismissal consistent with the provisions of local laws.

The company reserves its right, as per the provisions of law, in inspecting all personal belongings at any time inside the work



headquarter including but not limited to desks, tables, computers, cars and cabinets and others.

6-14 To keep the safety and security of employees, it is prohibited to bring weapons including firearms, ammunition, explosives, weapons and inflammable tools into its affiliated facilities or its vehicles. Also, the company will not tolerate the hostile actions or threat of violence, including extremist or inappropriate threats, whether verbal, physical intimidation or coercion.

6-15 The company urges all employees to report on any behaviors which may violate professional and ethical behavior conduct referred to herein.

All employees, customers, suppliers and shareholders can give their comments or report on these violations without any fearing from revenge and harassment. At the same time, they can request consultation from the auditing committee in case of any current or possible problems.

The following methods of reporting and inquiry for any violations related to this code of conduct and also expressing proposals are provided for developing this code of conduct.

- Boxes of complaints and suggestions: Such complaints and suggestions are provided in the company locations and its headquarter. Different forms of reports, suggestions and inquiries could be accessed via our webpage.
- E-mail: chairman@viva.com.kw to receive different suggestions, inquiries and reports

Taking into account the privacy and interests of all individuals, the auditing committee shall investigate any conduct that affects the reputation of company or violates the ethical work conduct. All



employees shall cooperate with the committee members mentioned when conducting any procedure.

6-16 The employees of company shall not feel any concern because of their exposure to revenge when reporting ethical or legal violations by others. Also, we should note that making false accusations and defamatory statements - whether verbally, in writing - about those violations are prohibited categorically. The company shall not tolerate dealing with any behavior refers to the desire of revenge or harm anyone intentionally by reporting proved or suspected excesses to this code of conduct. The company shall take disciplinary procedures reaching to work dismissal against any employee who has a role in act of revenge.

